

Date

**30<sup>th</sup> August 2022**

**TOWN AND COUNTRY PLANNING ACT 1990, SECTION 77**

**TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000**

**APPLICATION BY LONDON LUTON AIRPORT OPERATIONS LIMITED**

**FOR VARIATION OF CONDITIONS 8 (PASSENGER THROUGHPUT CAP), 10 (NOISE CONTOURS), 22 (CAR**

**PARKING MANAGEMENT), 24 (TRAVEL PLAN), AND 28 (APPROVED PLANS AND DOCUMENTS)**

**TO PLANNING PERMISSION 15/00950/VARCON (DATED 13 OCTOBER 2017)**

**LPA REFERENCE NUMBER 21/00031/VARCON**

**PINS REFERENCE NUMBER: APP/B0230/V/22/3296455**

**SUMMARY PROOF OF EVIDENCE – TRANSPORT**

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## 1. QUALIFICATIONS/EXPERIENCE

- 1.1 My name is Johnny Ojeil, a Director at Ramboll UK and leader of the UK Transport Planning Business and previously a Director of Arup responsible for leading the transportation planning group in the Midlands.
- 1.2 I am a Fellow of the Chartered Institution of Highways and Transportation (CIHT) and a member of the Chartered Institute of Logistics and Transportation.
- 1.3 I am an Advisory Board Member, School of Civil Engineering at the University of Birmingham and am also a visiting lecturer.
- 1.4 I have 35 years' experience and have led on numerous projects that include for example: production of HS2 Transport Assessment Guidance, HS2 Phase 2b, Tesco Stores Ltd, London Luton Airport projects including the masterplan related to the 12–18 million passengers per annum and the rail link to Luton Parkway Station - DART, Birmingham Airport Runway Extension and Birmingham ASAS 2017-2022.

## 2. THE ASSESSMENT OF THE PROPOSALS

### Transport Assessment

- 2.1 In preparing the Transport Assessment (TA)<sup>1</sup>, several local and national policy documents were reviewed. The approach adopted was agreed with LBC and National Highways.
- 2.2 Details of how the proposed scheme complies with local and national policy is presented in Table 4.1 in section 4 of my main proof.
- 2.3 **Table 3.1** in my main proof presents a summary of the forecast traffic flows for the AM and PM peaks and shows the net increases in flows due to the increase in passenger numbers up to 19 mppa.
- 2.4 When comparing the total combined trips (AM Peak) for passengers and staff between 2019 and 2024, the results show an increase of 120 (82+38) two-way vehicle trips for passengers and staff, which amounts to an overall increase of 3.7%.
- 2.5 When comparing the estimated total combined PM Peak trips for passengers and staff between 2019 and 2024, the results show an increase of 92 (57+35) two-way vehicle trips for passengers and staff, which amounts to an overall increase of 3.2%.
- 2.6 To help mitigate these small increases in traffic flows, the Travel Plan<sup>2</sup> sets out targets to increase public transport patronage which will help offset the forecast increases in trips to/from the airport.
- 2.7 The mode share targets set out in the 2018-2022 Luton Airport Surface Access Strategy (ASAS) were broadly achieved when reviewed in 2019. More detail is provided in my main evidence.
- 2.8 No new parking spaces are proposed for the 19 mppa planning application.
- 2.9 The TA concludes that the increase in passengers from 18 mppa to 19 mppa is unlikely to have a significant impact on the operation of the existing transport network, due to a very modest increase in traffic flows generated by the proposed expansion.

<sup>1</sup> CD Ref 1.12

<sup>2</sup> CD Ref 1.13

## Travel Plan

2.10 The Travel Plan contains a number of targets which are summarised below.

### 2.11 Target 1: Reduce single-occupancy vehicle (SOV), non-electric private car travel:

- **1a. Reduce employee SOV, non-electric private car travel:** The 2022 target of a 64% SOV mode share *has already been achieved* with a reduction from 68% to 59% from 2016 to 2019. Therefore, a new 2024 target of 56% SOV mode share for employees has been set.
- **1b. Reduce passenger non-electric private car travel:** The 2022 target of a 43% private car travel *has already been achieved* with a reduction from 51% to 40% from 2016 to 2019. Therefore, a 2024 target of retaining the 40% achieved has been set, this is already 3% below the original target set for 2022. Once DART begins operations (in 2022), the shift is expected to happen mainly from taxi users, which are excluded from this target.
- **Car Sharing KPI:** Target of 50% awareness of the car sharing network for Staff by 2024. Awareness of the car sharing network has reduced from 27% to 22% between 2016 and 2019. The future target of 50% awareness will remain with specific measures put in place in to achieve this. The target of increasing the number of employees car sharing year-on-year (2018, 2020 and 2022) will remain.

### 2.12 Target 2: Increasing Sustainable:

- **2a. Increase employee travel by sustainable modes of transport:** The 2022 target of a minimum of 28% sustainable transport mode share for employees *has already been achieved* with an increase from 24% to 31% from 2016 to 2019. Therefore, a new 2024 target of 33% sustainable transport mode share for employees has been set.
- **2b. Increase passenger travel by sustainable modes of transport:** Passenger sustainable transport has increased from 32% to 43% between 2016 and 2019; *achieving the target of 34% set out in 2019*, as well as the previously established 36% 2022 target. A new 2024 target has been set to increase to 47% (Section 7 details specific measures for achieving this).
- **Bus and Coach KPI: Increase employee travel by bus and coach from 9% to 17% (+170 employees).** The 2022 target of a minimum of 11% bus/coach mode share for employees *has already been achieved* with an increase from 9% to 16% from 2016 to 2019. Therefore, a new 2024 target of 17% bus/coach mode share for employees has been set. Increase passenger travel by bus and coach from 16% to 17% (+150k passengers). Passenger bus/coach travel has increased from 16% to 22% between 2016 and 2019. A 2024 target of retaining this 22% has been set.
- **Rail KPI: Increase employee travel by rail from 7% to 10% (+170 employees).** Employee rail travel has increased from 7% to 8% between 2016 and 2019. A new 2024 target of increasing to 10% has been set. Increase passenger travel by rail from 16% to 25% (+1.12m passengers). Passenger rail travel has increased from 16% to 21% between 2016 and 2019. A new 2024 target of increasing to 25% has been set, as the opening of the DART is likely to have a positive impact on passenger rail travel.
- **Walking and Cycling KPI: Increase awareness of Cycle-to-Work scheme from 71% to 80% by 2024.** Awareness of the Cycle-to-Work scheme has reduced from 71% to 46% between 2016 and 2019. A 2024 target of 80% has been set to be achieved with specific measures put in place in Section 7. Increase employee travel by cycle from 1.6% to 3%. From 2016 to 2019, the percentage of staff arriving to the airport by cycle reduced from 2.4% to 1.7%. With the implementation of a set of measures detailed in Section 7, a new target has been set for 2024 of increasing the mode share of staff cycling to work to 3%.

### 2.13 Target 3: Promoting and Monitoring Sustainable Travel:

- **3a. Secure 12% participation in the staff travel survey by 2024 (1,020 employees):** Participation in the staff travel survey has increased from 10% to 12% between 2016 and 2019. A target of retaining 12% has been set for 2024.

- **3b. Increase the number of organisations attending the Airport Travel Forum:** Organisation participation in the Airport Travel Forum has increased from 8 organisations to 10 organisations between 2016 and 2019. A future 2024 target of increasing to 15 organisations has been set.
- **Promotion KPI: Deliver at least 4 promotional travel events per year throughout the ASAS period, one per quarter.** In 2019 LLA delivered 2 promotional travel events; a new target to double to 4 events per year has been set for 2024. Awareness of the Staff Travelcard has increased from 55% to 60% between 2016 and 2019. The future target of 65% will remain the same.

2.14 A summary of how the TP targets comply with local and national policy is presented in Section 4 of my main proof.

### **Car Parking Management Plan**

- 2.15 This section summarises the key components of the car parking management plan<sup>3</sup> which was submitted as part of the application submission documents.
- 2.16 No new car parking spaces are proposed as part of this application.
- 2.17 Condition 24 for the 18 mppa application required a Car Parking Management Plan (CPMP) to be produced which was subsequently approved in January 2016 (ref: 15/0065/DOC) by LBC.
- 2.18 This 18 mppa related CPMP has been revised to explain how the car parks would be managed if the airport was to expand up to 19 mppa.
- 2.19 Staff car parking is limited. The pricing regime for staff ensures that rail travel is an attractive alternative.
- 2.20 Staff incentives include:
- 50% discount on rail season tickets via Luton Parkway.
  - 15 to 30% discounts on bus travel.
- 2.21 The pricing regime in place encourages public transport usage by passengers.
- 2.22 The investment in DART will make rail travel attractive.
- 2.23 Car parking at London Luton airport has a low ratio of supply per passenger in comparison with most UK airports.

### **EIA Addendum – ESA2/ESA4**

- 2.24 Chapter 10 of the 2021 Addendum, ESA2<sup>4</sup>, concluded based on the assessment of potential impact as a direct result of the increase in passenger and employee numbers that the highway network including local roads are not likely to be subject to any significant impacts on the operation of the network. This was agreed with Luton Borough Council and National Highways.
- 2.25 Since Application submission in January 2021 and due to Covid the assessment years have changed and the 19 mppa is now anticipated to be reached by 2025. Thus, an ES Addendum was produced - ESA4<sup>5</sup>. The airport aircraft schedules have not changed between 2024 and 2025 so the traffic related forecasts remain valid in terms of net additional flows on the network as applied in the TA.
- 2.26 The net increase predicted on the highway network during the morning peak hour is 121 and 93 vehicles for the AM and PM peak hour respectively. These increases are not significant.

<sup>3</sup> included in CD Ref 1.12 Appendix B

<sup>4</sup> CD Ref 1.09

<sup>5</sup> CD Ref. 1.16

### 3. RELEVANT POLICY AND COMPLIANCE

#### Policy Compliance

- 3.1 Table 4.1 in my main proof summarises how the proposals comply with the relevant local and national transport policies.
- 3.2 The proposals comply with the transport policies set out in the local policy documents (Luton Local Plan (2011-2031), Luton Local Transport Plan 3 (2011-2031), Hertfordshire Local Transport Plan 4 (2018-2031)) through the development of a Travel Plan which details a document of measures aimed at improving sustainable accessibility to from and from the Airport. Along with the production of the Travel Plan, the Airport continues to invest in sustainable transport infrastructure and services which will support the objectives of the main transport policies and will help the Airport become more accessible thus supporting the economic growth of the Airport whilst reducing the impact of the Airport on the local transport network. A Car Park Management Plan has also been produced to help the airport manage its car parks strategically by encouraging passengers to travel more sustainably through the management of pricing and capacity through all the Airports car parks.
- 3.3 The proposals comply with the main transport policies set out in the national policy documents through the production of a Transport Assessment, Travel Plan and Car Park Management Plan. The Transport Assessment shows that the proposals accord with NPPF policy by demonstrating that the increase in passenger throughput is unlikely to have a significant impact on the operation of the transport network.
- 3.4 The Travel Plan and Car Park Management Plan have been produced to help support other national transport policies listed in Table 4.1 by facilitating a modal shift in travel to and from the Airport aimed at encouraging and promoting an increase in walking, cycling and public transport. This is achieved through detailed Travel Plan measures, improvements in public transport infrastructure and services and through the management of car parking and car trips to the Airport.

### 4. LUTON BOROUGH COUNCIL AND NATIONAL HIGHWAYS POSITION

- 4.1 Discussions took place throughout the consultation and planning process and the TA, TP and CPMP were reviewed and accepted by officers at Luton Borough Council.
- 4.2 This is reflected in the Statement of Common Ground (SoCG) agreed with Luton Borough Council dated 23<sup>rd</sup> May 2022.
- 4.3 National Highways have been fully engaged throughout the pre-application and application process.
- 4.4 Jacobs as technical advisors concluded:  
*"Based on the assessment work presented to us, we have concluded that the likely impact of the proposed scheme of the SRN is not likely to be significant.  
As such, if an application for an increase to 19 mppa is submitted, we would recommend that Highways England respond with a no objection in this case".*
- 4.5 I conclude that National Highways are fully satisfied.

## 5. RULE 6 PARTIES AND OTHER KEY REPRESENTATIONS

- 5.1 One Rule 6 party has raised issues with regards to transport impact – LADCAN.
- 5.2 In LADACAN's Statement of Case they that *"they will demonstrate that the assumptions regarding modal shift between public and public transport are misplaced. This will have an impact in relation to air quality, transport noise and transport assessments."*
- 5.3 LADACAN has not explained why they consider that the modal shift assumptions are 'misplaced'. I believe the assumptions applied are robust.
- 5.4 Section 3 of my proof covers in detail the various sustainable travel targets set as specified in the TA and the TP which is supported by the CPMP.
- 5.5 The TP, including the modal share assumptions and proposed targets and actions plans were accepted by LBC and National Highways. They will be the subject of an ongoing monitoring regime.
- 5.6 LLAOL have met their Surface Access Strategy targets three years before the set date of 2022. LLAOL has a proven track record of meeting and exceeding set targets. Further, the introduction of DART later this year (which has not been taken into account in establishing the mode share targets) gives further confidence that the mode share assumptions are robust. This is because DART is likely to further encourage the use of rail to access the Airport.

### **Other Representations –by non-Rule 6 Parties – North Herts District Council**

- 5.7 Representations made by Vincent Gorbong on behalf of North Herts District Council and in particular paragraph 17 pages 3 and 4 include: *"NHDC raised concerns on other matters including traffic on local roads and air quality. The response provided by the Applicant refers the reader back to the content of the Environmental Statement. Whilst this signposting is welcomed, NHDC's concerns with regard to these matters remain. The absence of significant impacts relies on ambitious targets aimed at increasing Cycling and Public Transport use for staff and passengers, yet connectivity in this regard along the A5905 corridor is poor. Thus, whilst the change may not be significant enough to have meaningful impacts, the NHDC area is likely to experience a disproportionate increase in traffic, particularly around Hitchin and remains a serious concern."*
- 5.8 The airport has met its 2022 modal share targets in most cases by 2019. It was deemed in discussion with officers of LBC to target higher values than those already achieved.
- 5.9 The total two-way traffic as a result of the increase to 19 mppa during the key AM and PM peak hours are 121 and 93 vehicles respectively. Not all of these trips are forecast to be on local roads.
- 5.10 In the AM peak 54% of trips, 65 trips, will be arriving and leaving via the M1 south and 31%, 36 trips, via the M1 north respectively. The total two-way trips on the motorway is 101 out of a total predicted level of 121. Thus only 20 trips are predicted on the local road network.
- 5.11 In the PM peak it is expected that out of 93 trips, 50 will travel along the M1 south and 29 will access and egress the M1 north. This leaves 14 vehicles in total predicted to access local roads during the PM peak hour.
- 5.12 It is predicted that some 9% will be heading to and from the A505 corridor which equates to 11 vehicles during the AM peak hour and 9 vehicles during the PM peak hours.
- 5.13 The above numbers are not significant in terms of any increases in queues, delay or congestion as a result of airport expansion to 19 mppa.

## 6. CONCLUSIONS

- 6.1 Agreement has been reached with the expert highway authorities:
- Luton borough Council.
  - National Highways.
- 6.2 Both highway authorities have concluded that the additional generated traffic from the proposed increase to 19 mppa will not have a significant effect on the performance of the network. Neither has disputed the modal share assumptions applied.
- 6.3 The TA concludes that the increase in passengers from 18 mppa to 19 mppa is unlikely to have a significant impact on the operation of the existing transport network.
- 6.1 No new parking spaces are proposed. The existing 18 mppa Car Parking Management Strategy is appropriate for the 19 mppa scenario in combination with controlled capacity and pricing, monitored through the ASAS and Travel Plan.
- 6.2 The Travel Plan is the basis of promoting sustainable modes of travel and includes measures to help reduce the reliance on the private car. The targets set and agreed with the local authority will require monitoring and reporting on as part of an ongoing action plan.
- 6.3 The airport has exceeded its targets by some 3 years prior to Covid.
- 6.4 Consideration of the Transport section for both ESA2 and ESA4 make clear that the current submitted documents and the agreements reached with various authorities remain valid.
- 6.5 The delay of realising 19 mppa by one year from 2024 to 2025 has no material impact on the work to date.
- 6.6 The low predicted flow increases during the AM/PM peaks attributed to the 19 mppa application shows that no operational issues will occur when compared to the baseline scenario.
- 6.7 The proposed expansion of the airport will be compliant with all applicable local and national transport policies and any additional vehicle trips generated as part of the expansion can be accommodated by the local highway together with a robust Travel Plan.

### **Overall Conclusion**

- 6.8 The transport assessments are robust and there are no valid transport related reasons, including policy, for this application not to be granted.