Date
30th August 2022

SUMMARY PROOF OF EVIDENCE – TRANSPORT – JOHNNY OJEIL FCIHT, MCILT

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

PROOF OF EVIDENCE – TRANSPORT

JOHNNY OJEIL MSC (ENG) FCIHT, MCILT

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1. QUALIFICATIONS AND EXPERIENCE

Table of Definitions

The Airport	London Luton Airport
APF	Aviation Policy Framework
ASAS	Luton Airport Surface Access Strategy
CAA	Civil Aviation Authority
CBLTP	Central Bedfordshire Local Transport Plan 3 (2011–2026)
CPMP	Car Parking Management Plan
DART	Direct Air Rail Link
DfT	Department for Transport
DOZ	Drop Off Zone
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESA	Environmental Statement Addendum
ESA1	July 2015 ES Addendum in relation to section 73 application dated 25 June 2015 with ref. 15/00950/VARCON
ESA2	January 2021 ES Addendum in relation to section 73 application 21 January 2021 with ref. 21/00031/VARCON
ESA3	May 2021 ES Addendum in response to a Regulation 25 request for clarifications on the noise assessment
ESA4	July 2022 ES Addendum to update the ES in relation to some changes to the description of the proposed wording of Condition 10 and also due to the passage of time since the original application
GHG	Greenhouse gases
HLTP	Hertfordshire Local Transport Plan 4 (2018–2031)
HS2	High Speed Rail 2
LADACAN	Luton and District Association for the Control of Airport Noise
LBC	Luton Borough Council

LBCCAP	Luton Borough Council's Climate Action Plan
LDF	Local Development Framework
LLAOL	London Luton Airport Operations Limited
LTP	Local Transport Plan
mppa	Million Passengers Per Annum
NPPF	National Planning Policy Framework
S73 Application	The application dated 8 January 2021 under section 73 of the Town and County Planning Act 1990 by LLAOL to vary Conditions 8 (Passenger Throughput Cap), 10 (Noise Contours), 22 (Car Parking Management), 24 (Travel Plan) and 28 (Approved Plans and Specifications) to planning permission 15/00950/VARCON granted by LBC on 13 October 2017 to accommodate 19 million passengers per annum and to amend the day and night noise contours (with ref. 21/00031/VARCON)
SOV	single-occupancy vehicle
TA	Transport Assessment
TP	Travel Plan

Introduction

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 Ove Arup and Partners Ltd responsible for leading the transportation planning group in the Midlands. My responsibilities included delivering projects for both the private and public sector including multi-disciplinary projects.

1.2   I have 35 years of experience and have been involved in numerous matters as an expert witness which includes appearing at planning appeals, in the High Court and at Select Committee (HS2).

1.3   I am a graduate of the University of Birmingham with an MSC (Eng) in Traffic and Transport Planning and hold a postgraduate Diploma in Traffic and Transport Engineering from the City of Birmingham University.

Affiliations

1.4   I am a Fellow of the Chartered Institution of Highways and Transportation (CIHT) and a member of the Chartered Institute of Logistics and Transportation. I am an ex-Chair and Committee Member of the Chartered Institution of Highways and Transportation - Midlands Region.

1.5   I am an elected member of the Council for the Association of European Transport (AET) and am the Aviation Chair for the European Transport Conference (ETC) that is held annually.

1.6   I am an Advisory Board Member, School of Civil Engineering at the University of Birmingham and am also a visiting lecturer responsible for the delivery of the Transport Planning module as part of a Master's programme at the School of Civil Engineering.

Experience

1.7 I have extensive experience in the field of transport planning and in assisting on obtaining development consents as an expert transport planner.

1.8 I have worked and led on numerous projects that include for example: production of HS2 Transport Assessment Guidance for all consultants to adopt, HS2 Interchange Station by Birmingham Airport and Curzon Street in Birmingham City Centre, HS2 Phase 2b to Crewe, Tesco Stores Ltd across the UK, London Luton Airport projects including the masterplan related to the planning application 12–18 million passengers per annum (mppa) and the rail link to Luton Parkway Station known as DART, Reading Football Club, Bull Ring Redevelopment, Birmingham Airport Runway Extension, Birmingham Airport Surface Access Strategy 2017-2022, UK Central, Sky Headquarters in Hounslow, East Midlands Airport various transport commissions and The Commonwealth Games 2022, Birmingham.

1.9 Until recently, as a result of change of employment, I was the discipline lead on transport for the DCO application which is being worked up and is led by London Luton Airport Limited, known as Luton Rising, which aims to seek permission for an increase in passenger numbers to up to 32 mppa.

1.10 I also led a separate study in the East of Luton area that entailed building a traffic model and carrying out junction and link assessments that led to proposed highway improvements being promoted. This study was carried out on behalf of Luton Borough Council. Another commission that I led on was carrying out a high-level review role of Luton's Local Transport Plan document.

1.11 I have also worked on a wide variety of other transport sector projects in the United Kingdom which includes motorway related improvements to existing motorway infrastructure such as the M42, M6 and M1 and have audited on behalf of DfT submissions for major scheme funding applications.

1.12 I have also provided evidence to the High Court related to transport matters on behalf of LLAOL dealing with public transport and bus and coach travel to and from the Airport. I also have experience in supporting Hybrid Bill applications mainly related to parliamentary approved Royal Consent procedures for major infrastructure projects for two sections of High Speed 2.

1.13 I have been advising LLAOL on traffic and transport matters related to their planning application seeking an increase in passenger throughput to 19 mppa per annum. My input was related to producing information for submission to National Highways which included being involved in producing airport related forecast flows.

1.14 The evidence which I prepared in this proof is true and has been prepared and given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

2. INTRODUCTION

Planning Application

2.1   On 11 January 2021 London Luton Airport Operations Limited ('LLAOL') made an application under section 73 of the Town and Country Planning Act 1990 ('the 1990 Act') to Luton Borough Council for the following:

'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 13th October 2017) to accommodate 19 mppa and to amend the day and night noise contours.' The S73 Application seeks the variation of certain conditions attached to the existing planning permission for Luton Airport ("the Airport") dated 13 October 2017 with reference number 15/00950/VARCON ("the Variation Permission"). The Variation Permission dated 13 October 2017 is described as such as it was itself a variation of a planning permission granted in June 2014 for the expansion of the Airport involving, inter alia, the dualling of Airport Way, extensions to the terminal, a new pier and walkway, extensions to taxiways, enlargement of car parks and the construction of a multi-storey car park (ref: 12/01400/FUL) ("the 2014 Permission").

2.2   The section 73 application proposes amendments to five conditions. In summary:

a)   the proposed variation of condition 8 is to increase the passenger cap by 1 million passengers per annum ('mppa') from 18 mppa to 19 mppa.
b)   the amendments to condition 10 are temporary amendments to the summer day and night-time noise contours.
c)   the proposed variation of condition 22 provides for an update to the approved car parking management plan which is required as a result of the increase in passenger numbers.
d)   the proposed variation of condition 24 provides for an update to the passenger travel plan which is also a result of the increase in passenger numbers.
e)   the proposed variation of condition 28 is required to reflect the variations of the car parking management plan and the passenger travel plan.

Planning History and Environmental Statement Information

2.3   A summary of the Airport's planning history and environmental statement information relevant to this S73 Application is as follows:

a)   In December 2012 LLAOL submitted a planning application (12/01400/FUL) accompanied by an Environmental Statement (dated November 2012) ("the 2012 ES"). This was for the expansion of the Airport involving inter alia the dualling of Airport Way, extensions to the terminal, a new pier and walkway, extensions to taxiways, enlargement of car parks and the construction of a multi-storey car park.
b)   On 23 June 2014 the Council granted planning permission 12/01400/FUL.
c)   On 25 June 2015 LLAOL made a section 73 Application (15/00950/VARCON) for the variation of condition 11(i) relating to nighttime noise levels. This was accompanied by an ES Addendum dated July 2015 ("ESA1").
d)   On 13 October 2017 the Council granted planning permission 15/00950/VARCON, the Variation Permission.
e)   On 8 January 2021 LLAOL made this S73 Application 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 13th October 2017) to accommodate 19 million passengers per annum and to amend the day and night noise contours. (21/00031/VARCON)'

2.4 This application was accompanied by an ES Addendum dated January 2021 ("ESA2"):

a) In May 2021 LLAOL produced a further ES Addendum ("ESA3") in response to a Regulation 25 request for clarifications on the noise assessment.

b) After considering the S73 Application over two evenings on 30 November 2021 and 1 December 2021, the Development Management Committee of LBC agreed with officers, and resolved to grant planning permission for the Development, subject to the Applicant and LBC entering into a section 106 agreement.

c) On 6 April 2022, the Secretary of State for Levelling Up, Housing and Communities called-in the Application for his own determination and directed that it should be referred to him instead of being dealt with by LBC.

d) On 11 May 2022, the Secretary of State for Transport made a direction under section 266(1A) of the Town and Country Planning Act 1990 for a joint determination of the Application.

e) In July 2022 LLAOL produced a further ES Addendum in support of its application. The purpose of this addendum was to update the ES in relation to some changes to the description of the proposed wording of Condition 10 and also due to the passage of time since the original application ("ESA4").

Secretary of State Call In

2.5 Following a direction of the Secretary of State for Levelling Up, Housing and Communities in April 2022 to call in the planning application submitted by LLAOL, (Application number: 21/0031/VARCON) and the notification of co-determination by the Secretary of State for Transport, I was engaged to act on LLAOL's behalf as the traffic and transport witness at the forthcoming public inquiry commencing 27th September 2022.

2.6 Matters which the Inspectors wish to be informed about includes:

• The implications of the proposal for meeting the challenge of climate change.
• The effect of noise associated with the proposal on health, quality of life, and the character of the area.
• The effect of the proposal on air quality.
• The effect of the proposal on sustainable transport objectives and transport infrastructure.
• The socio- economic implications of the proposed scheme.
• Whether the proposed scheme would be consistent with the Development Plan and other relevant policies.
• The effect of other considerations on the overall planning balance.

2.7 In broad terms, I address transport matters in relation to two different areas: a) transport policy and sustainability and b) the operation of the highway network.

2.8 The location of the Airport and its surrounding network is shown in **Figure 2-1 (JO Figure A)**.

Figure 2-1 (JO Figure A): Surrounding Network
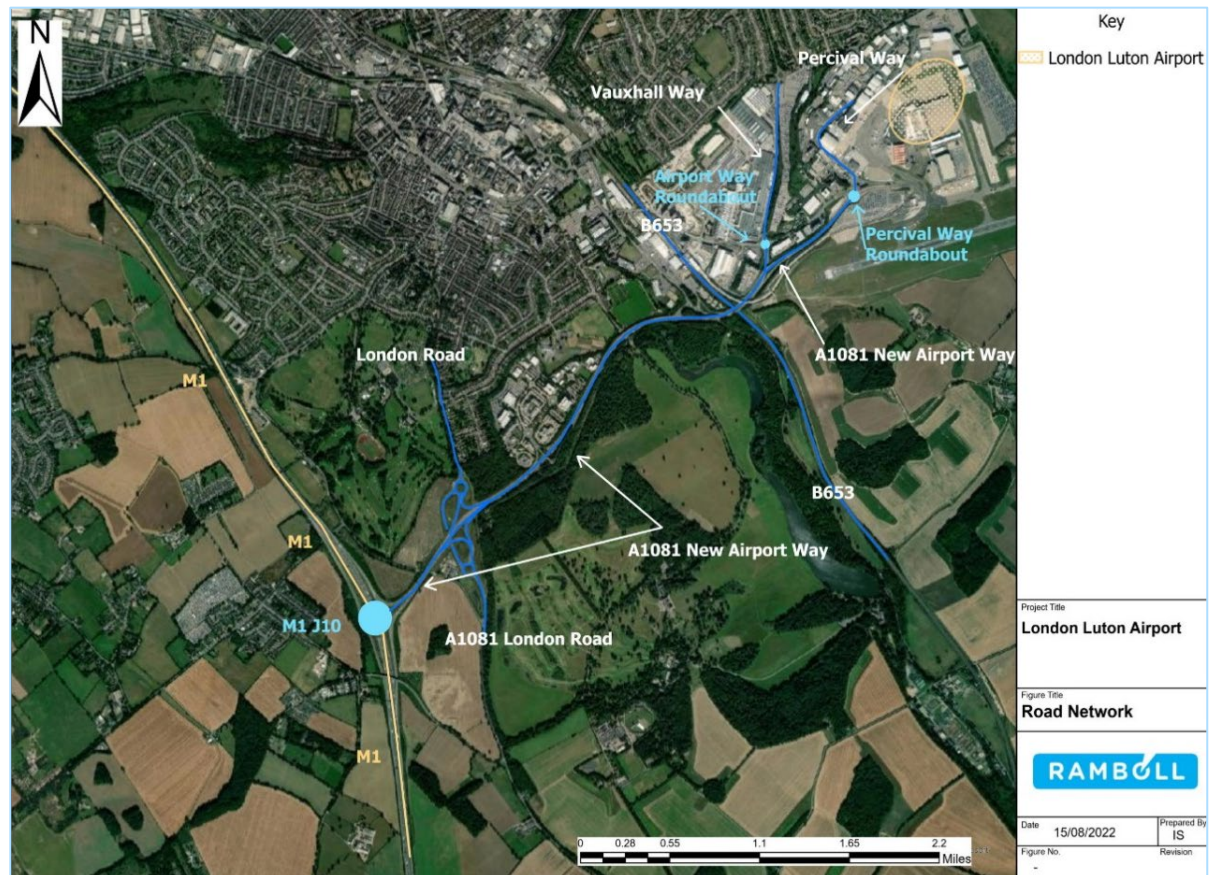
Scope of this Proof of Evidence

2.9   My evidence covers:

a) Assessment of the transport related aspects of the proposals submitted as part of the planning application which includes the Transport Assessment, Travel Plan, Car Parking Management Plan and the Transport Section of the ES as updated.

b) Relevant policy considerations related to transport.

c) Liaison and agreements reached to date with relevant authorities (mainly being National Highways and Luton Borough Council) related to highway network operations and sustainable transport.

d) Matters raised by third parties and other relevant representations.

e) Conclusions.

3. THE ASSESSMENT OF THE PROPOSALS

Supporting Documents - Transport

3.1 As part of supporting the S73 Planning Application the following key documents were submitted in relation to transport. Each document is summarised in this section of my proof.

3.2 A- Transport Assessment – Wood dated December 2020 – CD Ref 1.12.

3.3 B- Travel Plan – Wood dated December 2020 – CD Ref 1.13.

3.4 C- Car Parking Management Plan – Wood dated December 2020 - (included in CD Ref 1.12 Appendix B).

3.5 D- Following discussions and further liaison with various parties Wood issued a Transport note addressing questions raised by the Council in March 2021,

3.6 E- The transport section of ESA2 CD 1.09.

3.7 F- The transport section of ESA4, CD Ref 1.16.

3.8 The following summarises the key elements of each of the documents listed above.

Transport Assessment – Summary

3.9 This section summarises the Transport Assessment document ("TA") and brings together the key findings and conclusions. It covers policy matters and addresses modes of transport including sustainable modes for both passengers and staff.

Policy Background

3.10 In preparing the TA, several local and national policy documents were reviewed to assess the proposed passenger expansion's compliance with national and local policy. The approach adopted in this TA was agreed with officers of LBC and with National Highways.

3.11 The **local policy** documents reviewed included:

- Luton Borough Council's Climate Action Plan Support (January 2020)
- London Luton Airport Surface Access Strategy: 2018–2022 (Reissue 2019)
- Hertfordshire Local Transport Plan 4: 2018–2031 (May 2018)
- Luton Local Plan: 2011-2031 (November 2017)
- Central Bedfordshire Local Transport Plan 3: 2011–2026 (April 2011)
- Luton Local Transport Plan 3: 2011–2026 (March 2011)

3.12 The **national policy** documents reviewed included:

- The Transport Decarbonisation Plan (TDP) - Decarbonising Transport: Setting the Challenge (2020)
- Aviation 2050 — the future of UK aviation (Consultation Response Document 2019)
- National Planning Policy Framework - Ministry of Housing, Communities and Local Government (February 2019)
- Aviation 2050: The Future of UK Aviation (December 2018)
- Airports National Policy Statement (ANPS) (2018)
- Beyond the Horizon – the future of UK aviation: Making best use of existing runways (2018)
- National Planning Policy Framework - Ministry of Housing, Communities and Local Government (2014)
- Aviation Policy Framework (APF) (Department for Transport, March 2013).

3.13 Details of how the proposed scheme complies with local and national policy is presented in Table 4.1 in section 4 of my proof. The TA identifies the following.

Existing Sustainable Transport Network

3.14 The Airport is well served by sustainable travel options providing a good local and regional multi-model offering. The public transport hub located within the Central Terminal Area (CTA) provides frequent shuttle services to the nearby Luton Parkway Rail Station as well as bus and coach services to a range of major cities and airports across the UK.

3.15 Access to the Airport on foot can be gained by footpaths and crossing facilities along the Airport Approach Road, Airport Way and Percival Way. Passengers are less likely to cycle to the Airport; however, cycling is an option for nearby staff. For cyclists, dedicated facilities are not provided into the CTA, however, shared foot/cycle ways along parts of the A505 and on-road facilities provided along the A1081 all benefit local cyclists.

Road Access and Car Parking Facilities

3.16 The Airport has very good direct connections to the existing strategic highway network. The A1081 provides direct access with Junction 10 of the M1 which is where most of the Airport traffic arrives from. The A505 additionally extends to the east and into Luton Town Centre and beyond to the M1 J11.

3.17 The CTA is situated within the centre of the site and provides vehicular and pedestrian access to the terminal building via Airport Approach Road. Key facilities and services that can be accessed from the CTA include Public Transport Hub, Taxi rank, Priority Parking Area, Chargeable drop-off and pick-up zone, Short Term Car Parking including a Multi-Storey facility and Employee Parking.

3.18 The Airport currently has six car parks in operation consisting of one drop-off car park (DOZ), 2 x staff car parks (Car Park B & NHCP), 2 x any length car parks (TCP1 & TCP2), 1 x mid-stay (MSCP) and 1 long-stay car park (LSCP). No further parking provision is proposed as part of the 19 mppa planning application.

Existing Road Demand

3.19 An agreed high-level assessment of the current network performance in the study area was undertaken using Google Maps Traffic for a typical weekday AM peak at 08:15 (midway between 07:45-08:45hrs) and PM peak at 17:30hrs (midway between (17:00-18:00hrs) at nine links and junctions within the study area. The extent of study area was deemed appropriate by Luton Borough Council and National Highways.

3.20 Some junctions along this route exhibit existing queues and delays and, as such, if there were to be any impact in additional potential queue and delays as a result of additional airport traffic from proposals these were considered to be of relevance for assessment purposes.

Network Road Safety Record

3.21 Personal Injury Accident data was obtained from Luton Borough Council and Central Bedfordshire Council from April 2016 to February 2019 and January 2016 to March 2019 respectively. Following a detailed analysis of the data for the latest three-year period within the study area, it was identified that there are no inherent design flaws or accident black spots identified on the local highway network and thus no further assessment was required.

Proposed Infrastructure Improvements

3.22 Two key infrastructure projects underway are the DART rail link system and the M1-A6 link road which are currently progressing within the Luton and wider area.

3.23 The DART system will provide an improved public transport connection for passengers and airport staff between Luton Airport Parkway Station and the terminal. The new link will provide quick access to the terminal from Luton Airport Parkway in under four minutes and will remove the element of delays and traffic congestion the current bus shuttle service experiences. The service is due to open in 2022 and aims to allow passengers to reach the terminal from London St. Pancras within 30 minutes, providing an improved rail link between the airport and a major London railway station.

3.24 The new M1-A6 strategic link road will provide a new 4.4km long highway link and will act as a northern by-pass around Luton's northern quarter aimed at reducing rat-running through local villages and to make the area more attractive to businesses through easy connections to the M1 and A6. The application for the link road was granted in January 2020 and construction is expected to take approximately some 2 years to complete.

2019 Airport Travel Demand

3.25 The Airport continued to grow in passenger numbers between 2015 and 2019, showing the highest growth in annual aircraft movements against other major London Airports. INSERT FOOTNOTE: "Using CAA data which includes data for infants who are not paying customers or allocated seats" In 2019, the Airport's highest demand was between May and October with over 414 flights per day on average.

3.26 The Civil Aviation Authority (CAA) Passenger Survey Report (published in 2019) – section 9 .1 of the TA - identified that the greatest proportion of passengers travelling to Luton Airport in 2019 were from the South-East (53.6%), followed by the East of England (32.8%), with the remaining 13.6% made up of other regions. Of these trips, 39.8% of passengers used private cars/rental cars as their main travel mode, 16.4% used taxi/minibuses, 22.3% used bus/coaches, 21.2% used rail and 0.1% used other modes.

3.27 A Staff Travel Survey conducted by Systra on behalf of LLAOL in 2019 – section 9.2 of the TA - showed that 59.4% of staff drive alone as their main form of transport to work, followed by 23.6% by public transport, 7.9% by multi-occupancy car trips and 7.5% by active modes such as walking and cycling.

3.28 Capacity and occupancy estimates were gathered from LLAOL for July 2019 for rail patronage to the Airport. The estimates identified a maximum demand of 15,840 daily passengers (21.2% of model share) using the bus shuttle from Luton Parkway Rail Station and it was assumed that nearly all these passengers on this shuttle will have alighted from other rail services.

3.29 Capacity and occupancy estimates were also gathered for bus and coach patronage to the Airport and the estimates identified that the car park shuttle buses had an average daily spare capacity of over 80%, scheduled bus/coach services and the Luton Parkway shuttle service had an average daily spare capacity of approx. 50% and ad hoc bus/coach services (of which there were 2505 in 2019) had an average space capacity of 20%. These results identify there is room for increased patronage on most of the bus-based services.

2024 Future Airport Travel Demand

3.30 When the S73 Planning Application was submitted, the Airport expected passenger volumes to return to 2019 levels (18 mppa) by 2023 and expected passenger numbers to increase to 19 mppa (if permitted) by 2024 (a year later as shown in ESA3). Given the significant uncertainties in the travel market, it was determined that using the maximum passenger and flight volume increase would be the most robust approach to the assessment, which assumed

that the Airport would continue to grow with the forecasted growth and as such, the future demand was analysed based on 19 mppa by 2024.

3.31 In order to estimate future airport demand at the Airport, a 2019 18 mppa scenario was developed by ARUP based on 18 mppa aircraft schedules supplied by York Aviation. Flight estimates were based on a typical October average weekday aircraft movement, avoiding half terms and weekends when background road traffic could be expected to be lower. The average load factor used was 90% (like the summer peak to ensure we have a robust set of figures) to ensure any individual peaks and troughs in the day were not underestimated.

3.32 ARUP carried out a traffic flow comparison by generating forecast flows for a 2024 scenario for 19 mppa to establish increases in flows between the 18 mppa scenario and 19 mppa forecast scenario. This analysis did not consider the beneficial impact of DART. This means that the modal share for this forecasting that has been applied is conservative and the assessment of impacts is robust. If more passengers and staff use DART once it is introduced, the traffic flows to the Airport will be lower.

3.33 **Table 3.1** 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 19mppa.

Table 3-1: AM/PM Peak Passenger & Staff Traffic Flow Comparison (18 mppa v 19 mppa)

	AM Peak				PM Peak			
	2019 18 mppa	2024 19 mppa	Diff. 18v19	Diff. %	2019 18 mppa	2024 19 mppa	Diff. 18v19	Diff. %
Staff Numbers								
Total No. of Staff	10,935	11,285	**350**	**3.2%**	10,935	11,285	**350**	**3.2%**
Non-Shift Staff	765	790	**25**	**3.3%**	765	790	**25**	**3.3%**
Total Staff Numbers	**11,700**	**12,075**	**375**	**3.2%**	**11,700**	**12,075**	**375**	**3.2%**
Staff Trips								
Inbound Trips	1,115	1,147	**32**	**2.9%**	263	270	**7**	**2.7%**
Outbound Trips	240	246	**6**	**2.5%**	983	1011	**28**	**2.8%**
Total Staff Trips	**1,355**	**1,393**	**38**	**2.8%**	**1,246**	**1,281**	**35**	**2.8%**
Passenger Trips								
Bus/Coach	140	146	**6**	**4.3%**	140	146	**6**	**4.3%**
Taxi/Mini	466	487	**21**	**4.5%**	405	418	**13**	**3.2%**
Private Car	1264	1319	**55**	**4.4%**	1097	1134	**37**	**3.4%**
Inbound Trips	860	897	**37**	**4.3%**	860	889	**29**	**3.4%**
Outbound Trips	1,010	1,055	**45**	**4.5%**	781	809	**28**	**3.6%**
Total Passenger Trips	**1,870**	**1,952**	**82**	**4.4%**	**1,641**	**1,698**	**57**	**3.5%**
Total Trips (Passenger + Staff)	**3,225**	**3,345**	**120**	**3.7%**	**2,887**	**2,979**	**92**	**3.2%**

3.34 **Table 3.1** shows there is forecast to be an increase in the number of staff of 3.2% (375 staff) due to the proposed airport expansion, which results in an extra 350 staff of which 25 are non-shift staff per day.

3.35 During the AM peak the results show there will be a small increase in passenger trips of 4.4% at the Airport between 2019 and 2024 and a small increase of 2.8% in staff vehicle movements (38 vehicles), with the highest increase in inbound trips of 32 vehicles. When comparing the estimated total combined trips 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%.

3.36 During the PM peak the results show there will be a small increase in passenger trips of 3.4% at the Airport between 2019 and 2024 and a small increase of 2.8% in staff vehicle movements (35 vehicles), with the highest increase in inbound trips of 28 vehicles. When comparing the estimated total combined 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%.

3.37 To help mitigate these small increases in forecast traffic flows, the Travel Plan sets out targets to increase public transport patronage which will help offset the forecast increases in trips to/from the Airport. It should also be noted that CAA data shows a continuous increase in public transport modal share and as such the volumes of car borne traffic are likely to be significantly less going forward. This is further supported by the construction of the DART system which has not been included in ARUP's forecast and is very likely to cause a further reduction in the number of staff and passengers using private car as their mode of travel.

3.38 The assessments presented in the TA therefore represent a robust assessment of the potential increase in traffic flows between 18 mppa and 19 mppa. Based on this, and after consultation with National Highways and Luton Borough Council, it was considered that the net increase in traffic flows is unlikely to have a significant impact on the operation of the highway network and it was agreed that no further detailed transport modelling was required.

3.39 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 paragraphs 3.52 to 3.54 of my evidence below. For example, key targets such as the reduction of single occupancy vehicle travel for staff and passengers were met and, in many cases, exceeded. Given this positive history of sustainable mode shift, more ambitious sustainable mode share targets have been set in agreement with the local authority, as set out in the Travel Plan.

3.40 No new parking spaces are proposed for the 19 mppa planning application. The existing 18 mppa Car Parking Management Strategy has been deemed appropriate for the 19 mppa scenario in combination with controlled capacity and pricing, monitored through the ASAS and latest Travel Plan.

3.41 The TA was prepared in line with the scope agreed by LBC and Highways England. It is a robust assessment. It 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. The mitigation measures such as the Travel Plan and DART system will only help reduce the effects of any minor increase in traffic flows further.

Travel Plan - Summary

3.42 This section summarises the Travel Plan ("TP") which was submitted as part of the application documents.

3.43 As a lot of targets (part of the Airport Surface Access Strategy 2018-2022) have been met in 2019 rather than 2022, it was deemed in consultation with LBC that more ambitious targets should be set in the TP.

3.44 In preparing the TP, several local and national policy documents were reviewed to understand whether the proposed passenger expansion complied with national and local policy. Details of how the TP complies with local and national policy is presented in Table 4.1 in section 4.

3.45 The Airport is well served by sustainable travel options. The public transport hub located within the Central Terminal Area (CTA) provides frequent shuttle services to the nearby Luton Parkway Rail Station as well as bus and coach services to a range of major cities and airports across the UK.

Passenger Travel

3.46 Based on CAA data the Airport has seen a 13.6% increase in the use of public transport between 2016 (30%) and 2019 (43.6%), with a 7.3% in bus/coach travel and a 6.2% increase in rail travel. This has coincided with a reduction in private car and taxi/minibus use of 10.8% (10.2% car & 0.6% Taxi/minibus) between 2016 (67%) and 2019 (56.2%).

Staff Travel

3.47 The latest Staff Travel Plan travel survey results shows Single Occupancy car travel amongst staff has reduced by just over 8% from 2016 to 2019. Bus travel increased by nearly 7% owing to the improvements in service provision, service frequency and staff discounts since the last Framework Employee Travel Plan was produced in 2012.

3.48 Public Transport use amongst staff has increased from 16.6% to 23.6% in 2019, however active travel modes (walking and cycling) have remained broadly the same (7.6% to 7.5% in 2019). Despite the small increase in walking mode share, cycling mode share has reduced by 0.7% to 1.7% in 2019.

3.49 Results from the survey identified that 30% of respondents live within a 5km commute of the Airport which equates to a 20-minute cycle ride, showing that there is a large proportion of staff that are potentially capable of changing their travel behavioural if the right measures are put in place to promote cycling.

Existing Targets of the Travel Plan

3.50 Targets set in the 2018-2022 ASAS were compared to the 2019 CAA data and analysis of the ASAS targets against current data has helped derive future 2024 targets. The following sources were employed to obtain target data:

- pre-existing targets for 2016, 2019 and 2022 for staff and passengers have been obtained from the 2018-2022 ASAS;
- actual target results for 2016 for staff and passengers have been obtained from the 2018-2022 ASAS.
- actual target results for staff in 2019 have been obtained from a Staff Travel Survey conducted by Systra in 2019; and
- actual target results for passengers in 2019 have been obtained from 2019 CAA Passenger Survey Report.

3.51 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.

3.52 **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. Increasing in the number of employees car sharing year-on-year (2018, 2020 and 2022) will remain.

3.53 Target 2: Increasing Sustainable Travel to and from the Airport:

- **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, with Section 7 detailing specific measures for achieving this.

- **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%.

3.54 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.

3.55 A summary of how the TP targets comply with local and national policy is presented in Section 4.

<u>Travel Plan Measures</u>

3.56 Table 4.1 in section 4 presents the key measures to be implemented at the site to help facilitate, promote and encourage sustainable transport choices through smarter travel choices to/from the Airport for passengers and staff.

<u>Monitoring and Evaluation</u>

3.57 The TP will be monitored regularly by the TP Co-Ordinator and Luton Borough Council to make sure specific target targets, schemes and level of participation of events are on track and working.

3.58 A monitoring report will be produced and summited within 3 months of surveys and any proposed changes will be discussed with Luton Borough Council and implemented by the site travel plan coordinator accordingly.

3.59 Review of the TP will be undertaken based on results of monitoring surveys and identified targets. If TP targets are not met, further monitoring will be required, and remedial measures introduced to help meet the targets of the Travel Plan.

<u>Action Plan</u>

3.60 The Action Plan (shown in Table 3.2) has been produced to summarise how the elements of the TP will be implemented and the responsible parties. This will ensure that targets are met. Timescales are defined as short term (0-1 years), medium term (1 -3 years) and long term (3–5 years).

Table 3-2: Travel Plan Action Plan

Measure	Timescale (Short / Medium / Long)
W1: Encourage walking to work if the staff member lives within a 30-minute walking distance.	Short
W2: Ensure that high quality and appropriate wayfinding is in place to guide pedestrians to transport links and key destinations. Ensure walkways are well-lit at night to ensure safe movement throughout the site	Short
C1: Promote safe cycling, including sale of discounted locks and safety equipment (helmets and bike lights) through local bike shops for staff.	Short
C2: Promote the Cycle+ salary sacrifice scheme for staff (offering tax-free cycle purchases)	Short
C3: Provide an ongoing delivery of cycle events, initiatives and training, and support national events where appropriate	Short
C4: Incorporate secure cycle parking facilities within the design of all buildings within the site. Ensure cycle storage facilities are well lit, secure and offer protection from the weather.	Medium
C5: Ensure adequate provision of shower and changing facilities for staff commuting by bicycle	Medium
C6: Quarterly cycle maintenance event for staff	Short
C7: Identifying suitable commuter cycling corridors and routes to be improved in order to encourage staff to cycle to work.	Medium
PT1: Continue to promote local bus and coach travel and build upon previous attempts to promote the Luton Dunstable Busway	Short
PT2: Continue to promote the Staff Discount Travel Card	Short
PT3: Ensure clear signage and wayfinding guides public transport users to nearby bus stops and rail services and that it is of a high standard.	Short
PT5: Ensuring the provision of live travel information and timetables for staff and passengers for bus stops and train times.	Short
PT6: Explore procurement options for a change from diesel/petrol to electric/hybrid shuttle vehicles on-site	Medium
PT7: Promotion and marketing of DART upon launch	Short / Medium / Long
MV1: Provide and enforce Priority Parking areas for car-clubs and car-sharing opportunities	Short
MV2: Explore procurement options for a change from diesel/petrol to electric/hybrid service vehicles on-site	Short

Measure	Timescale (Short / Medium / Long)
MV3: Introduce controls and enforcement to prevent vehicles from idling while delivering or visiting the site.	Short
MV4: Promote taxi or ride-sharing opportunities through the use of ride-share schemes, car clubs and app-based travel	Medium
MV5: Personalised travel planning sessions for staff to explore sustainable travel options	Short
MV6: New starters travel information packs on sustainable travel options, discounts and promotion	Short
MV7: Review current provision and potential installation of additional electric charging points for passengers.	Short
EV1: Monitor usage of existing charging points for electric vehicles (currently 10 charging points available)	Short
EV2: Promote the use of electric vehicle facilities	Short
EV3: Review the potential installation of additional electric vehicle charging points depending on increasing demand	Short
EV4: The introduction of pricing incentives (such as the "electric vehicle drop-off tariff") for EVs where appropriate without compromising the uptake of public transport and active travel.	Short

Car Parking Management Plan – Summary

3.61 This section summarises the key components of the car parking management plan which was submitted as part of the application submission documents.

3.62 No new car parking spaces are proposed as part of this application.

3.63 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.

3.64 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. It also shows what car parking supply is available.

3.65 **Figure 3-1 (JO Figure B)** shows the various car parking locations. In addition to the drop off zone there are, for passengers, within walking distances, two multi storey car parks known as TCP1 and TCP2. In addition, 2 surface car parks are available known as Mid Stay (MSCP) and Long Stay (LSCP).

3.66 Two staff car parking locations are also provided at Car Park B and at Navigation House (NHCP).

Figure 3-1 (JO Figure B): Car Park Locations

Passengers - Drop Off Zone (DOZ)

3.67   The Drop Off Zone (DOZ) shown in pink has capacity for around 120 vehicles and is controlled by number plate recognition. The DOZ is intended to be used as a drop off only and the charge goes up sharply after 10 minutes to reflect this policy.

Passengers - Terminal Car Park 1 (TCP1)

3.68   This multi storey car park (TCP1) shown in pink is barrier controlled and accommodates any length of stay and is the nearest to the Terminal. The pricing regime in place does however encourage it to act as a short stay car park. This car park also includes an electric vehicle drop off tariff which allows access for 30 minutes at a reduced rate of £2 which is aimed at encouraging electric vehicles.

3.69   The capacity of this car park is around 1,699 and accommodates any length of stay.

Passengers - Terminal Car Park 2 (TCP2)

3.70   TCP2 is a multi storey car park shown in orange located adjacent to TCP1. The capacity of this car park is around 1,924 and accommodates any length of stay.

Passengers - Mid-Stay Car Park (MSCP)

3.71   This surface car park (MSCP) shown in blue, has both a barrier facility and ANPR for pre-booked customers, is a 5-minute drive away from the terminal building and is accessed via free bus services. The pricing regime encourages cars to park over 4 hours. The capacity of this car park is around 1,281 spaces.

Passengers - Long Stay Car Park (LSCP)

3.72   The Long Stay Car Park (LSCP) shown in green, surface only barrier controlled, is a 10-minute free bus ride from the Terminal and accommodates around 4,151 spaces.

3.73   For all passenger car parking online pre booked pricing can lead to savings of between 5 to 80% lower than gate prices.

Staff Parking - Car Park B (CPB)

3.74   Car Park B shown in red has a free bus service is available for the 10-minute journey to the Terminal. The capacity is 612 vehicles with 20 allocated for car sharing (3%).

3.75   A yearly charge is in place for staff and this charge is reduced considerably for car sharers, from £775 to £365.

Navigation House Car Park (NHCP)

3.76   The Navigation House Car Park (NHCP) shown in yellow is located in front of Navigation House and close to the Terminal with a capacity of 94 and 10 motorcycle spaces. A shed is also provided for some 20 bicycles.

3.77   Barrier controlled pricing is at £2,315 per year with a reduction to £1,095 for car sharers.

Priority Parking Services

3.78   A meet and greet service is provide at MSCP1 and the pricing of this service varies based on demand, seasonality and availability of airport owned car parking spaces.

Summary

3.79   It is evident that staff car parking is limited considering that staff that work at the Airport are around 10,000. This encourages sustainable modes of transport to be considered. The pricing regime in place for staff ensures that rail travel is an attractive alternative.

3.80   Staff incentives are provided which include:

- 50% discount on rail season tickets via Luton Parkway Station
- 15 to 30% discounts on bus travel destinations.

3.81   Passengers will be encouraged to use alternative modes of travel other than by the private car as the Airport is not increasing its current stock.

3.82   The pricing regime in place also encourages public transport usage by passengers.

3.83   The investment in DART will further make rail travel more attractive.

3.84   In terms of car parking London Luton airport has a low ratio of car parking supply per passenger in comparison with most UK airports. London Luton Airport has broadly one space per 1,965 passengers compared to Gatwick (970), Stansted (804), East Midlands (334), Birmingham (1045), Edinburgh (1165) and Manchester (1,336).

EIA Addendum – ESA2 and ESA4

3.85   In Chapter 10 of the 2021 ES Addendum, ESA2, submitted as part of the application it was concluded, based on the assessment of potential impact as a direct result of the increase in passenger and employee numbers to cater for a 19 mppa airport, 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.

3.86 Since the Application was submitted in January 2021 and as a result of the Covid pandemic the assessment years have changed and the 19 mppa is now anticipated to be reached by 2025 rather than 2024. Thus, an ES Addendum was produced in the form of ESA4. However, 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.

3.87 The table below shows the Airport flows for both the 18 mppa and 19 mppa scenarios for the key AM and PM peak hours. From a highway operational point, the key critical hours are the AM and PM peak hours as this is the time period when background traffic is at its highest and thus for capacity, queue and delay these hours are selected for assessment. This approach is standard industry practice.

3.88 The 18 mppa at 2019 was estimated by ARUP based on near actual 18 mppa aircraft schedules supplied by York Aviation.

Table 3-3: AM PEAK Comparison 2019 18 mppa and 2024 and 2025 19 mppa – Airport related flows

Mode	2019 AM (18 mppa)	ESA3 - 2024 AM (19mppa)	ESA4 - 2025 AM (19 mppa)	Difference in flows
Bus/ Coach	140	146	146	6
Minicab	466	487	487	21
Private Vehicles	1264	1319	1319	55
Staff	1355	1393	1393	38
Total	**3225**	**3345**	**3345**	**121**

Table 3-4: PM PEAK Comparison 2019 18 mppa and 2024 and 2025 19 mppa – Airport related flows

Mode	2019 PM (18 mppa)	ESA3 - 2024 PM (19mppa)	ESA4 - 2025 PM (19 mppa)	Difference in flows
Bus/ Coach	140	146	146	6
Minicab	405	418	418	13
Private Vehicles	1097	1134	1134	37
Staff	1246	1281	1281	35
Total	**2888**	**2979**	**2979**	**93**

3.89 As can be seen from the tables above 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 for this network.

3.90 It is also relevant to point out that around 85% of all airport traffic will travel up and down the M1 via Airport Way (A1081) to and from the Airport. This means that traffic on local roads will be very low during the key AM and PM peak hours.

Airport Forecast flows – 19 mppa at 2025

3.91 The forecast produced in ESA2, 2021, remains valid for ESA4 as the traffic flows do not change as aircraft schedules have not changed. Thus, the net increase in flows due to the increase to 19mmpa during both the AM and PM peak hours remain the same for 2024 and 2025.

Assessment year Impact 2024 to 2025

3.92 As background non airport related traffic will increase slightly from 2024 to 2025 the additional net airport traffic impact associated with the 19 mppa will reduce further.

3.93   This is the case due to no changes in aircraft schedules and an additional year of background traffic growth prevailing that would give rise to a slight increase in background traffic occurring. This change has no impact on operational matters such as junction capacities, queues and delays as background traffic increases will be small in magnitude.

Conclusions on ES Addenda - Transport

3.94   From the analysis carried out it is clear that no changes in airport related flows occur between the design forecast years of 2024 and 2025. The net increase in flows is thus the same in both ES Addenda ESA3 and ESA4.

3.95   Thus, I am very confident from the assessments that have been done and agreed by the relevant highway authorities that there will be no significant impacts and this conclusion remains robust as dealt with in the latest ES Addendum ESA4– with the assessment year moving from to 2024 from 2025 as a result of as slight delay in achieving 19 mppa.

4. RELEVANT POLICY AND POLICY COMPLIANCE

4.1 This section of my proof presents a summary of the local and national policy documents which are relevant to the proposals. Following the policy review, Table 4.1 presents a summary of how the proposals and Airport complies with the relevant policies and policy documents through the application of TP measures and Airport strategies.

Policy Review

Local Policy/Documents

Luton Local Plan: 2011-2031 (November 2017):

4.2 The Luton Local Plan (LLP) sets out policies, development allocations and actions for the area up to 2031.

4.3 The LLP sets out a series of 11 Strategic Objectives. Most notably, within the context of this development is the objective: 'To retain and enhance Luton's important sub-regional role as a place for economic growth and opportunity including the safeguarding of London Luton Airport's existing operations and to support its sustainable growth over the Plan period based on its strategic importance.'

4.4 As part of the spatial strategy, policy LLP6 sets out the 'London Luton Airport Strategic Allocation'. This gives policy and guidance on airport safeguarding, airport expansion, airport-related car parking, and design and drainage.

4.5 As part of the sustainable transport strategy, policy LLP31 sets out the strategy for sustainable transport in Luton which is based on the vision for the Local Transport Plan 2011-2026, which aims to *'ensure that an integrated, safe, accessible, and more sustainable transport system supports the economic regeneration and prosperity of the town.'*

Luton Borough Council's Climate Action Plan Support (January 2020):

4.6 Section 6 of Luton Borough Council's Climate Action Plan (LBCCAP) addresses the London Luton Airport Emissions. This document was published in January 2020 and aims to provide an evidence base to inform the Luton Borough Council's (LBC) Climate Action Plan.

4.7 Its objectives are to better understand:

- the borough's carbon footprint using a location-based accounting approach;
- use this information to determine the proportion of emissions that can be influenced locally without the action of regional or national actors; and
- gaps in data where further work is needed.

4.8 To aid LBC in the following areas:

- providing a more informed evidence base for future action plan development which also serves to inform and direct existing local projects;
- to encourage confidence in the mandate for climate action, thus facilitating the establishment of a robust local strategy which can deliver objectives over a long-term cycle.

4.9 In terms of transport, the LBCCAP states that in order to reduce emissions from surface transport, it will be imperative that passengers have access to affordable, regular public transport options to shift away from current high levels of private vehicle use. It is anticipated that the opening of the Luton DART will help to reduce the number of passengers arriving

and leaving the Airport by private vehicle, however a strong community engagement plan will be needed to support this to encourage more uptake of public transport by airport staff and passengers. Infrastructure capacity improvements to support the growth in electric vehicles will also be a key enabler for emissions reduction.

Hertfordshire Local Transport Plan 4: 2018–2031 (May 2018)

4.10   The Hertfordshire Local Transport Plan 4 (2018–2031) ("the HLTP") was published last year and sets out Hertfordshire's future vision for the county up until 2031. The HLTP highlights a transition away from car-based investment and capacity optimisation due to financial, environmental and societal costs. It also highlights a strong move towards technology focused travel, specifically focusing on the challenges and opportunities technological development can play in the future of transport planning.

4.11   The HLTP aims to deliver 'nine transport objectives which contribute strongly to the Place, Prosperity and People.' These objectives subsequently relate to a series of more specific policies and schemes.

4.12   Within the context of this proposal, policy 11 addresses access to airports as follows:

'The county council, working in partnership with neighbouring local authorities and airport operators, will seek improvements to surface access to Luton and Stansted Airports, and promote and where possible facilitate a modal shift of both airport passengers and employees towards sustainable modes of transport.'

4.13   Specifically, in relation Luton Airport, it states:

'The county council will work with relevant stakeholders as part of the Thameslink programme. This is a key element of plans to increase rail travel to London Luton Airport from Hertfordshire and beyond, in conjunction with the airport light rail link proposal. This includes lobbying for longer trains on the Midland Main Line and more frequent, faster services to Luton Airport Parkway, as well as improved and easier ticketing arrangements.'

Central Bedfordshire Local Transport Plan 3: 2011–2026 (April 2011):

4.14   The vision of the Central Bedfordshire Local Transport Plan 3 (2011–2026) ("CBLTP") is to:

'Globally connect, delivering sustainable growth to ensure a green, prosperous and ambitious place for the benefit of all by creating an integrated transport system that is safe, sustainable and accessible'

4.15   The CBLTP identifies 'areas of intervention' that the local authority will seek to deliver. These areas are small-scale schemes with relatively easy implementation plans. Areas include:
- Land use planning e.g., embedded sustainable transport provision;
- Smarter choices e.g., integrated electronic ticketing;
- Infrastructure and service provision e.g., pedestrian and bus stop improvements;
- Network management e.g., signage, ITS; and
- Demand management e.g., park and ride, freight terminals

4.16   The CBLTP also addresses major schemes that are to be delivered as part of the Core Strategy. One of the relevant schemes is the M1 junction 10a improvements which aims to:

'Construct a grade separated junction at M1 Junction 10A will improve access to Luton, Luton London Airport and surrounding villages, it is being promoted jointly by Luton Borough Council (LBC) and Central Bedfordshire Council with LBC as lead authority.'

Luton Local Transport Plan 3: 2011–2026 (March 2011)

4.17 The Luton Local Transport Plan 3 (LLTP3) (2011–2026) was produced in March 2011 and states the following:

'Our new transport strategy will help us to address local priorities, such as helping to improve the economic, social and environmental well-being of the local community and helping to improve health and reduce inequalities. It updates the policies contained within the Luton, Dunstable and Houghton Regis Local Transport Plan 2006-2011 published jointly by the Borough Council and the then Bedfordshire County Council and South Bedfordshire District Council, which were respectively the highway and planning authorities for Dunstable and Houghton Regis.

Government guidance recommends that Local Transport Plans demonstrate the relationship with the wider local policy context, in particular spatial planning elements defined through the LDF and those wider community aspirations detailed within the Sustainable Community Strategy.'

4.18 LLTP3 has been influenced by these wider local priorities and will show how transport will play a role in their achievement. In particular, transport can:

- Support economic growth by improving transport connections and journey reliability, making Luton more attractive for businesses;
- Protect the environment by promoting less environmentally damaging ways of travelling;
- Help make communities safer by reducing the number and severity of road traffic casualties;
- Promote health by enabling people to walk or cycle more, and by reducing air pollution; and
- Support vulnerable people and reduce inequalities by improving and ensuring equitable access to key services.

National Policy

National Planning Policy Framework (NPPF) (July 2021):

4.19 The NPPF is a material consideration and in particular paragraph 111 requires that development should be refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

4.20 In addition, paragraph 113 requires development proposals that generate significant additional traffic to include a transport assessment and a sustainable travel plan in order to reduce vehicle trips.

4.21 The rest of Chapter 9 details how new development should promote sustainable transport and that transport issues should be considered from the earliest stages of planning. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

The Transport Decarbonisation Plan (TDP) - Decarbonising Transport: Setting the Challenge (2020):

4.22 This document sets out the Government's plan to accelerate the decarbonisation of transport via policies which are addressed in the evidence of Matt Osund-Ireland. These include:

- **Policy 2.47:** Aviation, at present, is a relatively small contributor to domestic UK GHG emissions. Its proportional contribution is expected to increase significantly as other sectors decarbonise more quickly.
- **Policy 2.49:** Airport expansion is a core part of boosting our global connectivity and levelling up across the UK. The Government takes seriously its commitments on the

environment and the expansion of any airport must always be within the UK's environmental obligations.

Aviation Policy Framework (APF) (Department for Transport, March 2013):

4.23 The APF was published in March 2013 and outlines objectives and principles to guide plans and decisions on airport developments. The APF states that the "Government wants to see the best use of existing airport capacity" and that in the short-term, a key priority for Government is to continue to work with the aviation industry and other stakeholders to make better use of existing runways at all UK airports to improve performance, resilience and the passenger experience.

4.24 Section 5 (planning) sets out that all proposals for airport development must be accompanied by clear surface access proposals which demonstrate how the Airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the Airport, and minimise congestion and other local impacts. Our submission clearly demonstrates the above points as shown in the submitted transport documents that include the TA, TP and CPMP.

London Luton Airport Surface Access Strategy: 2018–2022 (Reissue 2019):

4.25 The London Luton Airport Surface Access Strategy (ASAS) is a compliance document aimed at ensuring that the Airport will comply with current local and national policies. The purpose of the ASAS is:

'To efficiently manage surface access to and from the airport in order to help minimise adverse impacts on the local community and environment, to promote and encourage sustainable surface transport and to help improve access to and from the airport for passengers, employees and service providers.'

4.26 The ASAS sets out an Action Plan which aims to reduce Single Occupancy Vehicle (SOV) car use through improvements to sustainable travel modes. The objectives on the Action Plan are:

- To promote and encourage sustainable transport options for employees and passengers;
- To reduce the impact of surface access to the Airport on the local community.

Summary of Policy Compliance

4.27 Table 4.1 summarises how the proposals will comply with the relevant local and national transport policies as reviewed above. The table shows the relevant policy document, followed by the relevant policy requirement summary and how the proposals comply with the policies. The final column identifies which Travel Plan measures (detailed in the Travel Plan) are being applied to comply with reviewed policies.

Table 4-1: Policy Compliance

Policy Document		Policy Requirement (Summary)	Proposed Scheme Policy Compliance	Travel Plan Measures
Luton Local Plan: 2011-2031 (November 2017)	**Policy LLP6:** London Luton Airport Strategic Allocation	This policy and guidance relates to airport safeguarding, airport expansion, airport-related car parking, and design and drainage.	The principle of the development is supported by this policy. The Car Park Management Plan was produced to help manage car parking at the Airport. Appropriate public transport facilities have also been incorporated into the detailed development proposals to help facilitate a modal shift from car to more sustainable transport modes aimed at reducing the impact of Airport traffic on the highway network.	**TP Measures PT1 to PT6, MV1 to MV7** within the Travel Plan help the development comply with this policy.
	Policy LLP31: Sustainable Transport Strategy	This policy sets out the strategy for sustainable transport in Luton which is based on the vision for the Local Transport Plan 2011-2026, which aims to ensure that an integrated, safe, accessible, and more sustainable transport system supports the economic regeneration and prosperity of the Airport town.	A Travel Plan and Car Park Management Plan were produced to help facilitate a modal shift from car to more sustainable transport modes aimed at reducing the impact of Airport traffic on the highway network. Continued enhancement of sustainable modes of transport and transport facilities at the Airport via the Airport Surface Access Strategy.	**TP Measures PT1 to PT6, MV1 to MV7, EV2** within the Travel Plan help the development comply with this policy.
London Luton Airport Surface Access Strategy: 2018–2022	**Page 7:** Point A	Promote and encourage sustainable transport options for employees and passengers.	The Travel Plan contains a number of measures aimed at promoting and encouraging sustainable transport options for employees and staff.	**TP Measures C6, PT6, MV7** within the Travel Plan help the development comply with this policy.
	Page 7: Point B	Reduce the impact of surface access to the airport on the local community.	The Travel Plan contains a number of measures aimed at reducing single occupancy vehicle and private car journeys to and from LLA for all passengers and staff through promoting sustainable transport modes and increasing modal share. These measures will be complimented with improvements to transport infrastructure and services.	**TP Measures PT1 to PT6, MV1 to MV7** within the Travel Plan help the development comply with this policy.
Luton Local Transport Plan 3: 2011-2031 (November 2017)	**Chapter 4.1:** Local Policy Context	This policy aims to protect the environment by promoting less environmentally damaging ways of travelling.	The Travel Plan contains a number of Travel Plan measures aimed and promoting and encouraging sustainable transport options for employees and staff to and from Airport.	**TP Measures PT6, MV7, EV2, W1, C1** within the Travel Plan help the development comply with this policy.
		This policy aims to promote health by enabling people to walk or cycle more, and by reducing air pollution.		

Policy Document		Policy Requirement (Summary)	Proposed Scheme Policy Compliance	Travel Plan Measures
	Policy 6: Smarter Choices	This policy focuses on managing congestion and reduce greenhouse gas emissions through application of Smarter Choices measures to encourage a modal shift away from single occupancy car use and towards sustainable transport choices, particularly through travel planning processes.	The Travel Plan will be promoted to encourage more passengers and staff to use bus and rail services, along with walking and cycling to travel to and from the Airport.	**TP Measures PT1 to PT6, MV1 to MV7, EV2** within the Travel Plan help the development comply with this policy.
	Policy 12: Network Management	As part of its Network Management Duty the county council will seek to manage, and where feasible reduce traffic congestion.	A Transport Assessment was produced to assess the impact of the proposals on the highway network which concluded that the increase in passenger throughout would not have a significant impact on the highway network. A Travel Plan has been produced to help facilitate a modal shift from the car to more sustainable transport modes with an aim of reducing traffic congestion in and around the Airport.	**TP Measures PT1 to PT6, MV1 to MV7** within the Travel Plan help the development comply with this policy.
Hertfordshire Local Transport Plan 4: 2018–2031	**Policy 3**: Travel Plans and Behaviour Change	The county council will encourage the widespread adoption of travel plans through working in partnership with large employers, businesses and other organisations to develop travel plans and implement Smarter Choices measures.	A Travel Plan was prepared and submitted to Luton Borough Council aimed at promoting and offering guidance for sustainable travel to and from the Airport through the implementation of Smarter Choices measures which are a range of measures that can encourage reduced car use.	**TP Measures PT1 to PT6, W1 to W2, C1 to C7** within the Travel Plan help the development comply with this policy.
	Policy 11: Airports	This policy aims to improve surface access to Luton and Stansted Airports and promote where possible a modal shift of both airport passengers and employees towards sustainable modes of transport.	A Travel Plan and Car Park Management Plan were produced to help facilitate a modal shift from car to more sustainable transport modes aimed at reducing the impact of Airport traffic on the highway network. Continued enhancement of sustainable modes of transport and transport facilities at the Airport via the Airport Surface Access Strategy.	

Policy Document		Policy Requirement (Summary)	Proposed Scheme Policy Compliance	Travel Plan Measures
National Planning Policy Framework	**Chapter 9:** Promoting Sustainable Transport	Paragraph 111 states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."	The Transport Assessment demonstrated that the proposals are 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. The Travel Plan will support the findings of the Transport Assessment by helping to reduce the impact of any increase in trips to the Airport by promoting other more sustainable modes and monitoring through agreed Travel Plan targets and monitoring.	**TP Measures PT1 to PT6, W1 to W2, C1 to C7** within the Travel Plan help the development comply with this policy.
		Paragraph 113 details that all developments that generate significant amounts of movement should be required to provide a Travel Plan, and the application should be supported by a Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed.	Transport Assessment and Travel Plan prepared to support the planning application.	
		Paragraph 104 states that opportunities to promote walking, cycling and public transport use are identified and pursued.	Travel Plan measures have been used to promote walking, cycling and public transport to increase sustainable travel to and from the Airport.	
		Paragraph 104 states that opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised.	Travel Plan measures have been put in place whereby existing and proposed transport infrastructure such as live travel information and timetables, ride share schemes and pricing incentives are used to help model shift.	
		Paragraph 106 states development should provide high quality walking and cycling networks and supporting facilities such as cycle parking.	The Airport is committed to improving walking and cycling networks through application of Travel Plan measures and initiatives detailed within the Travel Plan.	
		Paragraph 107 states development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.	The Transport Assessment and Travel Plan provide information where electric vehicle parking is located.	

Policy Document		Policy Requirement (Summary)	Proposed Scheme Policy Compliance	Travel Plan Measures
		Paragraph 110 states that developments should take appropriate opportunities to promote sustainable transport modes.	The Travel Plan contains a number of measures aimed at promoting and encouraging sustainable transport options for employees and staff.	
		Paragraph 112 details how developments should give priority first to pedestrian and cycle movements.	The Airport will encourage and promote cycling walking for passengers and staff through Travel Plan measures and investment in improved cycling and walking infrastructure.	
Transport Decarbonisation Plan	**2a:** Decarbonising all forms of transport	Page 52: Increase cycling and walking.	The Airport will encourage and promote cycling walking for passengers and staff through Travel Plan measures and investment in improved cycling and walking infrastructure.	**TP Measures PT1 to PT6, W1 to W2, C1 to C7, MV1 to MV7** within the Travel Plan help the development comply with this policy.
		Page 72: Decarbonising our railways.	The Airport will encourage the use of local bus and rail services to shift travel to and from the Airport from road cars to bus and rail.	
		Page 86: A zero emission fleet of cars, vans, motorcycles, and scooters.	A Car Parking Management Plan and Travel Plan have been prepared to help monitor parking and to try and reduce single occupancy car journeys via Travel Plan measures such as car sharing and car clubs.	
	2b: Multi-modal decarbonisation and key enablers	Page 130: Delivering a zero emission freight and logistics sector.	The Travel Plan will help promote use of zero emission vehicles by providing electric charging facilities along with exploring procurement options for fleet vehicles from diesel/petrol to electric/hybrid vehicles for Airport vehicles.	
		Page 172: Maximising the benefits of sustainable low carbon fuels.	The Airport will encourage the use low carbon fuels wherever possible.	
		Page 178: Future transport – more choice, better efficiency.	The Travel Plan will help promote sustainable travel options for all passengers and staff. Travel Plan measures such as Cycle+ salary sacrifice and staff discount travel schemes.	

4.28 Table 4.1 identifies how the proposals comply with relevant local and national transport policies in the reviewed policy documents.

4.29 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 Airport's car parks.

4.30 The proposals comply with the main transport policies set out in the NPPF through the production of a Transport Assessment, Travel Plan and Car Park Management Plan. The Transport Assessment demonstrates that the increase in passenger throughput is unlikely to have a significant impact on the operation of the transport network. It therefore complies with the terms of the NPPF.

4.31 The Travel Plan and Car Park Management Plan support the delivery of 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.

5. LUTON BOROUGH COUNCIL AND NATIONAL HIGHWAYS POSITION

Introduction

5.1 As listed in section 4 key documents were submitted as part of the planning application that formed the basis of reaching agreements with the following highway authorities:

- Luton Borough Council as the planning and highway authority
- National Highways as the authority charged with operating, maintaining and improving England's motorways and major A roads that include the M1.

Luton Borough Council – Highway Authority

5.2 Several 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.

5.3 This is reflected in the Statement of Common Ground agreed with Luton Borough Council dated 23rd May 2022.

5.4 Key areas of agreement include:

- The study area selected, as shown in **Figure 2-1 (JO Figure A)**, in the Transport Assessment was deemed appropriate to test the impact of the additional airport related trips due to expansion to 19 mppa.
- Methodology applied including base data and modal share for the determination and testing of additional airport traffic (passengers and staff) was accepted.
- Forecast traffic flows were not deemed to have a significant impact on the operation of the highway network which is a key NPPF consideration. The AM peak and PM peak hour flows were predicted to increase as a result of the additional airport expansion to 19 mppa by 121 and 93 vehicles two way. This is a small increase in percentage terms (3.7% and 3.2% respectively) and is not deemed to be significant.
- No additional car parking spaces related to this increase in patronage is deemed appropriate and this will assist in more airport users shifting to sustainable modes of transport.
- The proposals meet policy requirements at a national and local level and will be driven by the Travel Plan that has a series of initiatives and actions. LLAOL will be working towards a reduction in private car usage with more emphasis on sustainable travel modes. This in turn will reduce emissions. For example, the DART rail link between the Airport and Luton Parkway station will help with this approach. DART is due to open towards the end of 2022 well in advance of our 19 mppa target of 2025.
- The comprehensive Travel Plan detailed actions are to be followed up as agreed with the local authority and is all geared towards reducing the reliance on the private car and encouraging more sustainable travel choices.
- Monitoring is a key factor moving forward with the Travel plan actions once approval is granted.

National Highways

5.5 National Highways have been fully engaged and consulted throughout the pre-application and application process.

5.6 Jacobs have been acting on behalf of National Highways as their technical advisors and National Highways have no concerns or objections on highway grounds as a result of the expansion of the Airport by 18 mppa up to 19 mppa.

5.7 In Jacobs response – dated 14th April 2020, Section 5 Conclusions and Recommendations they state:

"*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".

5.8 As such I conclude that National Highways are fully satisfied with the submitted application on the grounds of no significant impact will occur on their roads.

5.9 It is also relevant to point out that a large proportion of Airport traffic will use the M1 corridor as shown in the trip distribution **Figure 6-1 (JO Figure C)** in Section 6 of my proof.

6. RULE 6 PARTIES AND OTHER KEY REPRESENTATIONS

Luton And District Association for the Control of Aircraft Noise LADACAN

6.1   In relation to transport matters only one Rule 6 party has raised issues with regards to transport impact – LADCAN.

6.2   In LADACAN's Statement of Case they claim under section 4.4 paragraph 27 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."

6.3   LADACAN has not explained why they consider that the modal shift estimates are 'misplaced'. I have considered LADACAN's comments, and I believe the assumptions are robust.

6.4   Section 3 of my proof covers in detail the various sustainable travel targets set as specified in the TA and the TP which is also supported by the CPMP. These are summarised in Table 6.1 below.

6.5   The contents of the TP, including the modal share assumptions and proposed targets and actions plans were accepted by the relevant highway and planning authority and were also accepted by National Highways. They will be the subject of an ongoing monitoring regime moving forward.

6.6   It is highly relevant that 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 the targets which it has set.

6.7   Table 6.1 summarises the targets set up to 2024 and shows the historical trends covering 2016 and 2019 as a comparator.

Table 6-1: Summary of Targets/ Actuals 2016, 2019 and 2024

Target	Target 2016 (%)	Performance 2016 (%)	Target 2019 (%)	Performance 2019 (%)	Target 2022 (%)	Target 2024 (%)	Impact
Reduce employee single-occupancy, non-electric private car travel	68	68	66	59	64	56	2019 Target met with an additional reduction of 7%, a further reduction of 3% is expected by 2024.
Reduce passenger single-occupancy, non-electric private car travel	51	50	49	40	43	40	2019 target met with a reduction of 9%. A target of retaining the achieved 40% by 2024 has been set.
Increase employee travel by sustainable modes of transport	24	24	26	31	28	33	2019 target met with an additional increase of 5%, a further 2% increase has been set as a 2024 target.
Increase passenger travel by	32	32	34	43*	36	47*	2019 target met with an additional increase of 9%,

Target	Target 2016 (%)	Performance 2016 (%)	Target 2019 (%)	Performance 2019 (%)	Target 2022 (%)	Target 2024 (%)	Impact
sustainable modes of transport						High relative to DCO?	a further increase of 4% has been set as a 2024 target.
Increase employee travel by bus and coach	9	9	N/A	16	11	17	An increase of 1% on the target achieved in 2019 has been set as a target for 2024.
Increase passenger travel by bus and coach	16	16	N/A	22	17	22	A target of retaining the target achieved in 2019 has been set for 2024.
Increase employee travel by rail	7	7	N/A	8	9	10	An increase of 2% on the target achieved in 2019 has been set as a target for 2024.
Increase passenger travel by rail	16	16	N/A	21	24	25	An increase of 4% on the target achieved in 2019 has been set as a target for 2024.
Increase awareness of Cycle-to-Work scheme	71	71	N/A	46	80	80	A target of achieving an 80% of staff awareness of the scheme has been set for 2024.
Increase employee travel by cycle	N/A	2.4	N/A	1.7	N/A	3 Needs to be lower	A target of achieving an increase up to 3% of staff travelling by cycle has been set for 2024.
Increasing Car Sharing Awareness	N/A	27	N/A	22	50	50	A target of achieving 50% of staff awareness of the scheme has been set for 2024.
Secure 12% participation in the staff travel survey	10	10	12	12	12	12	A target of retaining the target achieved in 2019 has been set for 2024.
Increase the number of organisations	8	8	10	10	12	15	An increase of 5 additional organisations has been set for 2024.

| Target	Target 2016 (%)	Perfor mance 2016 (%)	Target 2019 (%)	Perfor mance 2019 (%)	Target 2022 (%)	Target 2024 (%)	Impact
attending the Airport Travel Forum							
Deliver at least 2 promotional travel events per year	2	2	2	2	2	4	An increase to 1 event per quarter, for a total of 4 events per year, has been set for 2024.
Increase in awareness of Staff Travelcard	53	55	60	60	65	65	An increase of 5% on the target achieved in 2019 has been set as a target for 2024.

6.8   As shown in Table 6.1 above 2022 targets have been exceeded (highlighted in Green) in 2019 for employee and passenger travel by sustainable modes. Also, reductions in single occupancy vehicles for both employees and passengers have been achieved in 2022 and also exceeded the relevant target.

6.9   The modal shift assumptions have not taken into account the introduction of the rail-based system DART. This is programmed to commence operation in late 2022. This will replace the current bus-based services to provide connectivity between the Airport and Luton Parkway Station. It is expected that this will increase the attractiveness of travelling to the Airport by rail and will encourage further public transport usage.

6.10   I consider that the increases in sustainable modal share agreed with the local authority are consequently modest in magnitude and are achievable based on the historic trends that are provided in this proof and in the key documents mainly being the Transport Assessment and the Travel Plan.

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

6.11   Representations made by Vincent Gorbing 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."*

6.12   The targets set are realistic and achievable and in the past targets set have been met well before the due target date as set out in table 6.1 above.

6.13   As set out above, historically the Airport has met its 2022 modal share targets in most cases by 2019. It was deemed appropriate in discussion with officers of Luton Borough Council to target higher values that those already achieved.

6.14 Table 6.1 above provides a comparator of the targets between the 2018-2022 SASR, 2019 actual and the proposed targets for this 19 mppa application.

6.15 In relation to traffic on local roads I would highlight that the total two-way traffic as a result of the increase to 19 mppa during the key AM and PM peak hours are only 121 and 93 vehicles respectively. Not all of these trips are forecast to be on local roads.

6.16 **Figure 6-1 (JO Figure C)** below shows the trip distribution of these trips which indicates that most of these trips (85%) will be heading to and from the M1 motorway.

Figure 6-1 (JO Figure C): Airport Trip Distribution
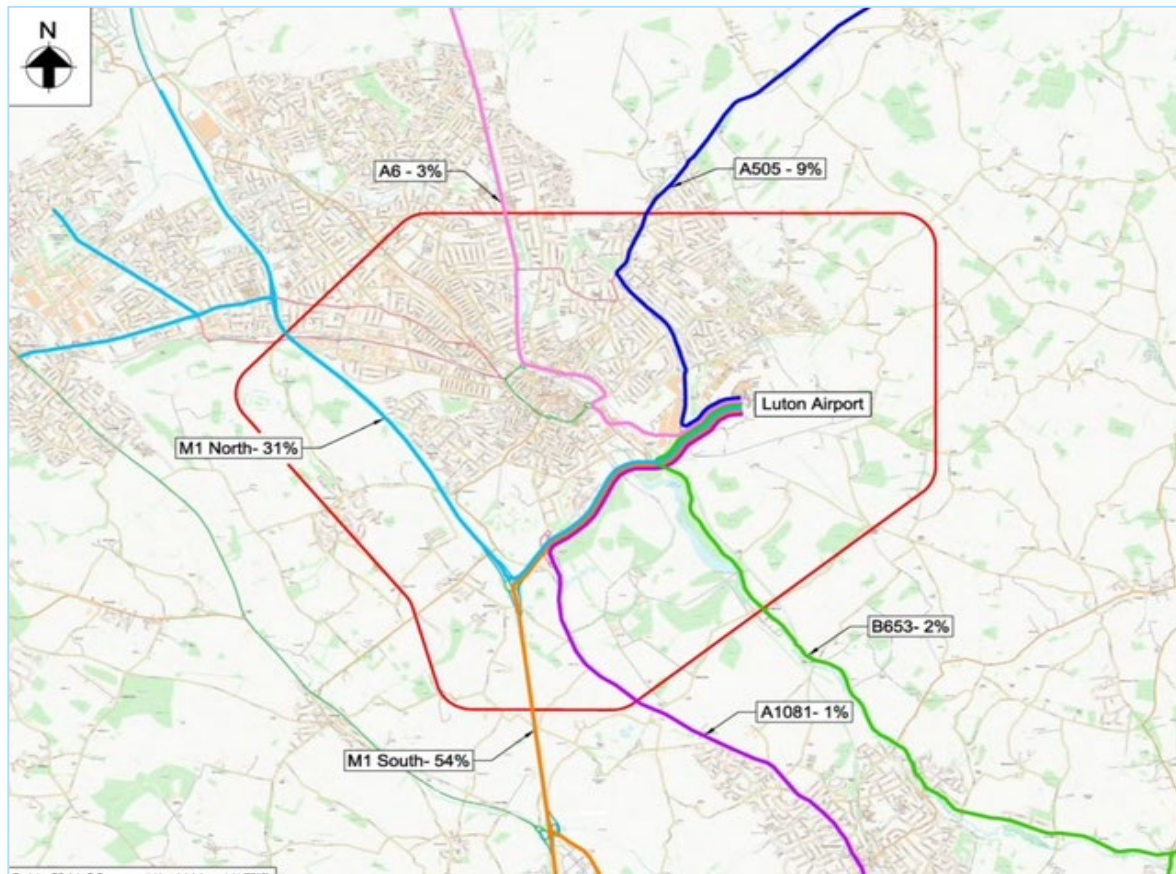
6.17 In the AM peak 54% of trips, 65 trips, will be arriving and leaving via the M1 south and 31%, 36 trips, via the M1 north respectively. The total two-way trips on the motorway is 101 out of a total predicted level of 121. Thus only 20 trips are predicted on the local road network.

6.18 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.

6.19 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.

6.20 The above numbers predicted on the local road network are not significant at all in terms of any increases in queues, delay or congestion as a result of airport expansion to 19 mppa.

6.21 Even if these trips were doubled in magnitude there would be no significant impact on local roads in terms of queues, delay and congestion over and above what is experienced without the expansion to 19 mppa.

6.22 **Table 6.2** below shows the net magnitude of increase on the highway network as a result of Airport expansion to 19 mppa. These include locations along the A1081 New Airport Way, A505, Vauxhall Way and the M1 north and south of junction 10.

6.23 It is clear from **Table 6.2** that on the local roads, including the A505, the increases predicted are very low in scale and therefore have no effect on any operational matters related to the highway network. This is also true for the A1081 New Airport Way and the M1 motorway.

Table 6-2: Net Increases in Flow due to Airport Expansion to 19 mppa

Location	Direction	AM Peak Hour			PM Peak Hour		
		Volume (18,000 person trips)	Net Increase	% Increase	Volume (18,000 person trips)	Net Increase	% Increase
A1081 New Airport Way (east of M1 J10)	EB	2344	59	2.5%	1698	48	2.8%
	WB	1503	43	2.9%	2503	54	2.2%
	Total	3847	102	2.7%	4201	102	2.4%
A505 (north of B653)	NB	761	2	0.3%	990	2	0.2%
	SB	952	2	0.2%	768	2	0.3%
	Total	1713	4	0.2%	1758	4	0.2%
Vauxhall Way (north of Airport Way roundabout)	NB	911	5	0.5%	1399	6	0.4%
	SB	1327	6	0.5%	1195	5	0.4%
	Total	2238	11	0.5%	2594	11	0.4%
A1081 London Road (South)	NB	469	1	0.2%	611	1	0.2%
	SB	826	1	0.1%	553	1	0.2%
	Total	1295	2	0.2%	1164	2	0.2%
North pf M1 J10	NB	5089	16	0.3%	6484	20	0.3%
	SB	5636	21	0.4%	5678	18	0.3%
	Total	10725	37	0.3%	12162	38	0.3%
South of M1 J10	NB	5942	18	0.3%	6494	31	0.5%
	SB	5743	20	0.3%	6396	34	0.5%
	Total	11685	38	0.3%	12890	65	0.5%

7. CONCLUSIONS

Highway Authorities

7.1   Agreement has been reached with the relevant highway authorities:

- Luton borough Council; and
- National Highways.

7.2   Following a thorough review process both 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 in terms of operation, capacity, queues and delays and safety. I agree. Neither highway authority has disputed the modal share assumptions which have been used in the transport assessment.

Transport Assessment

7.3   The TA was prepared in line with the scope agreed by LBC and Highways England and is a robust assessment. It 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. The mitigation measures such as the Travel Plan and DART system will help to reduce any minor increase in traffic flows further.

Car Park Management

7.4   No new parking spaces are proposed for the 19 mppa planning application. It has been considered that the existing 18 mppa Car Parking Management Strategy has been deemed appropriate for the 19 mppa scenario in combination with controlled capacity and pricing, monitored through the ASAS and latest Travel Plan.

Travel Plan

7.5   The submitted Travel Plan will form the basis of promoting sustainable modes of travel and will include 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 plan of action.

7.6   To date the Airport has exceeded its targets by some 3 years prior to the onset of Covid.

ES Addenda

7.7   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.

7.8   The delay of realising 19 mppa by one year from 2024 to 2025 has no material impact on the work to date and indeed a delay of one year may imply that non airport background traffic may grow slightly thus reducing in percentage terms further the overall trips on the network related to the expansion to 19 mppa.

7.9   The predicted net flow increases during the AM and PM peak attributed to the 19 mppa application shows that no operational issues will occur when compared to the baseline scenario. This is due to the low net increases in airport related traffic flows as shown in **Table 6.2** above.

Policy

7.10 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 network through promotion of robust Travel Plan measures and construction of the DART system.

Overall Conclusion

7.11 My overall conclusion based on the documents submitted, extensive detailed work carried out including consultation and the agreements reached, is that the transport assessments are robust and there are no valid transport related reasons, including policy, for this application not to be granted. Indeed, the proposal will deliver better use of the Airport in a sustainable way in transport terms and without any material impact on the highway network.