PROOF OF EVIDENCE

Transport

On behalf of

LUTON BOROUGH COUNCIL

Town and Country Planning (Inquiries Procedure) (England) Rules 2000

Antony Swift (BA Hons) MSc

APPLICANT: London Luton Airport Operations Limited

APPLICATION SITE: London Luton Airport, Airport Way, Luton

DESCRIPTION OF DEVELOPMENT: 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) for the dualling of airport way/airport approach road and associated junction improvements, extensions and alterations to the terminal buildings, erection of new departures/arrivals pier and walkway, erection of a pedestrian link building from the short-stay car park to the terminal, extensions and alterations to the mid-term and long-term car parks, construction of a new parallel taxiway, extensions to the existing taxiway parallel to the runway, extensions to existing aircraft parking aprons, improvements to ancillary infrastructure including access and drainage, and demolition of existing structures and enabling works and for the construction of multi-storey car park and pedestrian link building.

PINS REF: APP/B0230/V/22/3296455

LPA REF: 21/00031/VARCON

CONTENTS

1.   Introduction

1.1   This proof of evidence has been prepared by Antony James Swift, Principal Transport Planner, Sustainable Development at Luton Borough Council. I hold an MSc in Transport Planning and Management and have over 10 years' experience of transport planning in Local Government.

1.2   This document has been prepared on behalf of the Council (Luton Borough Council) in respect of the Secretary of State's decision for Call-In for Application: Luton Borough Council – 21/00031/VARCON by London Luton Airport Limited.

1.3   The application relates to a development proposal 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 contours at London Luton Airport – Airport Way.

1.4   This proof of evidence relates to the suitability of the application from a transport policy perspective, both national and local. My evidence has been prepared with reference to the Travel Plan submitted with this application. I have reviewed the policy, targets and measures set out in the Travel Plan document and considered these against their effect on sustainable transport objectives.

1.5   I confirm that the facts expressed in this proof of evidence are true to the best of my knowledge and belief, and that the opinions expressed in this proof of evidence represent my professional view.

2. Key National Policy

2.1 Jet Zero Strategy - Delivering net zero aviation by 2050: The UK Government is committed to achieving net zero UK aviation emissions by 2050, with domestic flights at net zero by 2040. The Strategy encourages airports to improve surface access strategies to ensure passengers, increase the use of public transport and minimise congestion, emissions and other local impacts. The details of its application in relation to surface access are to be found in Mark Hinnell's evidence on carbon emissions.

2.2 DfT's Aviation strategy: making best use of existing runways, published in 2018, recognises that updated aviation forecasts reflect the accelerated passenger growth experienced in recent years that has put pressure on existing infrastructure, despite significant financial investments by airports. The document refers to the government agreement with the Airports Commission's recommendation to be supportive of all airports who wish to make best use of their existing runways, including those in the South East, subject to environmental issues being addressed.

2.3 DfT's Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (2018) provides the primary basis for decision-making for an expanded Heathrow airport. Whilst its surface access targets do not apply to Luton's expansion (18mppa-19mppa), its description of the Government's objective for surface access (in relation to an expanded Heathrow) is valuable in guiding the approach to developing surface access policy: "to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, freight operators and airport workers who use transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of transport maximised as much as possible. This should be delivered in a way that minimises congestion and environmental impacts, for example on air quality and climate change."

2.4 Decarbonising Transport: Setting the Challenge (2020). This document sets out the Government's ambitious plan to accelerate the decarbonisation of transport. The Plan recognises that Aviation, at present, is a relatively small contributor to UK GHG emissions but its proportional contribution is expected to increase significantly as other sectors decarbonise. It supports airport expansion as a core part of boosting global connectivity and levelling up across the UK.

2.5 A comprehensive list of relevant national policy, including how the application is consistent with this policy, is included in Appendix A.

3. Key Local Policy

3.1 Luton's 2040 Vision sets the shared ambition for Luton over the next 20 years. The Council has an ambition to make Luton a carbon neutral town by 2040, 10 years ahead of the national target. It recognises Luton airport as a strategic asset and has an ambition to make Luton airport the most sustainable airport in the UK.

3.2 The Council is required by the Transport Act 2000 as amended by The Transport Act 2008 to produce a Local Transport Plan. Luton's Local Transport Plan 4 (2020-40), adopted in 2021 provides a policy framework from which decisions on investment in the local transport system are taken. The Plan sets out 23 policies which are driven by the need to reduce carbon emissions, poverty and improve inclusion. The plan places significant importance on expanding airport operations sustainably, achieved partly by increasing the number of passengers/employees accessing the airport by public transport.

3.3 Luton's Local Plan 2011-2031 seeks to encourage the use of sustainable transport measures in accordance with the airport's surface access strategy, updated periodically. Policy LLP6, states that proposals for expansion of airport operations or development, will only be supported where certain criteria are met. Of relevance, are sub-policies iv, which places a condition on the airport operator to assess the impacts of any increase in air transport movements on surrounding occupiers and/or local environment and identify appropriate forms of mitigation in the event significant adverse effects are identified. Further, sub-policy vii

stipulates that proposals, will, over time, result in a significant diminution and betterment of the effects of aircraft operating on the amenity of local residents. Finally, sub-policy viii, requires expansion proposals to incorporate sustainable transportation and surface access measures that, in particular, minimise the use of the private car, maximise the use of sustainable transport modes and seek to meet modal shift targets, all in accordance with the London Luton Airport Surface Access Strategy.

3.4   Luton's Emerging Net Zero Roadmap reaffirms its commitment to work in partnership with the airport to ensure its operations are both sustainable and resilient to climate change. It identifies a number of actions to reduce the carbon intensity of airport surface access. This includes encouraging the use of low/zero emission vehicles, the provision of EV charging infrastructure and promoting the number of trips to the airport by sustainable transport.

3.5   A comprehensive list of local policy, and how the application is consistent with this policy, is included in Appendix A.

4.   Main considerations

4.1   The policies, plans and strategies referred to in the Travel Plan are generally up-to-date and provide a sound context from which the Travel Plan has been developed. Where some policies have been superseded, as a result of time elapsing since the Travel Plan was produced, new policy developments do not compromise the suitability of this application, conversely, they support the measures set out within the Travel Plan.

4.2   The Travel Plan has been prepared in accordance with the London Luton Airport Surface Access Strategy, as per the requirements of the Council's Local Plan. Travel targets are stretching but achievable. They build on the airport's track record of delivering sustainably targets, identified in the Airport Surface Access Strategy ahead of 2022 and significant increases in public transport usage (passenger and employee travel) observed between 2016-2019.

4.3   The Travel Plan recognises that levels of active travel (cycling and walking) have not experienced the same rates of growth as other sustainable modes of transport, despite the fact c.30% of employees live within 5km of the airport. In response, the Travel Plan is supportive of including future infrastructure additions to the cycle network and will set out a series of cycle infrastructure improvements. The Council is committed to working with the airport to develop new active travel infrastructure set out in our Local Cycling and Walking Infrastructure Plan.

4.4   The Council considers that the methodology and sources of data applied to develop future travel targets is robust and appropriate.

4.5   Modally specific targets to increase sustainable travel are underpinned by promoting and monitoring sustainable travel behaviour. For example, by increasing the numbers of staff participating in the staff travel survey, widening the number of organisations attending the Airport Travel Forum and increased awareness of the Staff Travelcard. These initiatives are consistent with behavioural change interventions set out in the Council's Local Transport Plan.

4.6   The objectives of the Travel Plan align with the ambitions of Luton's Local Transport Plan 4, emerging Local Cycling and Walking Infrastructure Plan and EV Chargepoint Strategy.

4.7   The marketing and promotion strategy and use of Travel Plan coordinator is complementary of the approach the Council is taking to engage with schools, businesses and other organisations to promote the benefits of sustainable travel.

4.8   The Travel Plan Measures are far-reaching and conducive to achieving the prescribed travel targets. They reflect national, local and regional transport priorities. Responsible owners have been assigned and the monitoring and evaluation framework and action plan is fit-for-purpose.

4.9 It is recognised that the benefits of the Direct Air Rail Transit (DART) were not properly quantified in the Transport Assessment or Travel Plan. It is accepted that the introduction of the DART will only accelerate the rate at which modal shift targets will be achieved.

5. Optional Measures

5.1 The Council recognises that since the S73 application was submitted in January 2021 and the subsequent decision to grant planning permission in December 2021, the issue of decarbonisation of the transport network has increased in importance.

5.2 Figure 5.1 of the Environmental Statement Addendum (July 2022) shows that relative to the baseline (2019), Green House Gas (GHG) emissions arising as a result of the development decrease in all future scenarios to 2050. This is due to improved public transport targets, anticipated market trends regarding uptake of electric vehicles and efficiency improvements in transport modes that have been embedded into the GHG assessment. By 2050, surface access GHG emissions in the 'with development' case are lower than compared to the 2019 baseline in all future improvement emissions scenarios, falling by 79.6% in the central scenario. This is consistent with local policy.

5.3 The Environmental Statement Addendum (July 2022) assumes that the modally specific targets originally forecast for 2024 can be achieved by 2025 with travel patterns returning to their pre-COVID levels. The Council agrees with this assumption.

5.4 Notwithstanding, when comparing the 'with development' against the 'without development' scenario, modelling has shown an increase in GHG emissions related to surface access, particularly for the period from 2025 to 2031. Consequently, London Luton Airport's Outline Carbon Reduction Plan has been prepared to confirm the mitigation measures the applicant will take to achieve carbon neutrality by 2026 and deliver net zero carbon for London Luton Airport's direct operational emissions by 2040 (Table 4.1 and Table 4.2).

5.5 In accordance with the London Luton Airport's Outline Carbon Reduction Plan, the Council's policy to be a net zero Borough by 2040 and the Government's policies for carbon reduction including Jet Zero, measures can be taken by the Airport to address the short-term forecast increase in GHG emissions generated by surface access to ensure that the effects of surface access emissions are never worse than the base year. Such measures could include those to accelerate modal shift in favour of sustainable transport and/or bring forward the delivery of interventions prioritised in the medium or long-term.

6. Conclusions

6.1 The Council considers the proposal to have a strong strategic fit with national and local transport policy. The targets, measures and mechanism for monitoring GHG emissions associated with the development is proportionate but could go further by introducing additional measures to reduce net GHG emissions generated by surface access traffic. New evidence in the form of an Environmental Statement Addendum has demonstrated that despite changes to the forecast year from 2024 to 2025 and updated assessments, the conclusions of the original proposal remain valid.

Appendix A: Key National and Local Policy/Guidance

National/Local Policy	Wording	Met by
Jet Zero Strategy: Delivering net zero aviation by 2050 (CD 11.19)	**3.60** Will encourage airports to work with airlines, local authorities and local transport providers to consider how they can develop integrated service offerings with surface transport providers. **KPI:** Encourage airports to improve their surface access strategies to ensure easy and reliable access for staff and passengers, increase the use of public transport and minimise congestion, emissions and other local impacts.	The development of the Travel Plan and Transport Assessment required extensive liaison with the local authority, both prior to and post submission. The implementation of the Travel Plan includes integrated transport solutions such as enforcement of app based car-clubs and ride-sharing schemes. Targets set out in the Travel Plan have been updated following a review of the London Luton Airport Surface Access Strategy 2018-2022.
Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (ANPS) (2018) (CD 8.04)	**1.12** The Airports National Policy Statement provides the primary basis for decision-making on development consent applications for a Northwest Runway at Heathrow Airport and will be an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England. **5.5.** The Government's objective for surface access is to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, freight operators and airport workers who use	The Travel Plan is consistent with the ANPS objective for surface access to provide high quality, efficient, reliable access for passengers and airport workers by providing a range of measures that increase the provision of sustainable transport. It could go further by introducing additional measures to reduce net GHG emissions generated by surface access traffic.

	transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of transport maximised as much as possible. This should be delivered in a way that minimises congestion and environmental impacts, for example on air quality.	
Decarbonising transport: setting the challenge (2020) (CD 11.08)	**2.47** Aviation, at present, is a relatively small contributor to UK GHG emissions but its proportional contribution is expected to increase significantly as other sectors decarbonise more quickly. **2.49** Airport expansion is a core part of boosting global connectivity and levelling up across the UK.	The application seeks to increase airport throughput, which will increase the country's international competitiveness and contribute to levelling up Luton.
Decarbonising Transport – A better greener Britain (2021) (CD 11.11)	**P.121** Government will consult on a target for UK domestic aviation to reach net zero by 2040 **P.121** Government will consult on a target for decarbonising emissions form airport operations in England by 2040.	The Transport Assessment and Travel Plan have identified a range of targets and actions to achieve carbon 'net betterment' compared with a 2019 baseline.
Aviation 2050: The future of UK aviation (Consultation) (2018) (CD 10.14)	**3.67** It is important to have good surface access links with airports. All proposed airport developments need to 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 and minimise congestion,	The Transport Assessment and Travel Plan act as a clear strategy to manage surface access. Sustainable travel targets are set as is a mechanism for monitoring. The applicant has a well-established Airport Travel Forum and intends to increase its membership.

	emissions and other local impacts **4.34** Existing government policy states that airports are recommended to produce and keep updated master plans and airport surface access strategies. Airports with more than 1,000 passenger air transport movements a year are also advised to hold airport transport forums which develop and oversee implementation of plans for future surface transport provision.	
National Planning Policy Framework (2021) (CD 09.05)	**104.** Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: (a) the potential impacts of development on transport networks can be addressed; (b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; (c) opportunities to promote walking, cycling and public transport use are identified and pursued;	A Transport Assessment and Travel Plan have been submitted, the development of these documents required extensive liaison with the applicants both prior to and post the submission of the application. The Transport Assessment has determined that the residual effect on the highway network was minor and there was no likely discernible effect on highway safety. The Transport Assessment and Travel Plan are comprehensive and encourage a shift to sustainable forms of surface access.

	(d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and (e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. **111.** 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. **112.** Within this context, applications for development should: (a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate	

| | facilities that encourage public transport use;

(b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

(c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

(d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

(e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

113. All developments that will 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. | |
| Planning Practice Guidance: Travel Plans, | **Para 002** Travel Plans, Transport Assessments and Statements are all | The application is supported by a Travel |

| Transport Assessments and Statements (2014) (CD.12.12) | ways of assessing and mitigating the negative transport impacts of development in order to promote sustainable development. They are required for all developments which generate significant amounts of movements.

Para 009: In determining whether a Travel Plan will be needed for a proposed development the local planning authorities should take into account the following considerations:

• the Travel Plan policies (if any) of the Local Plan;

• the scale of the proposed development and its potential for additional trip generation (smaller applications with limited impacts may not need a Travel Plan);

• existing intensity of transport use and the availability of public transport;

• proximity to nearby environmental designations or sensitive areas;

• impact on other priorities/ strategies (such as promoting walking and cycling);

• the cumulative impacts of multiple developments within a particular area; | Plan and Transport Assessment. |

	• whether there are particular types of impacts around which to focus the Travel Plan (eg minimising traffic generated at peak times); and	
	• relevant national policies, including the decision to abolish maximum parking standards for both residential and non-residential development	
	Para 013 In determining whether a Transport Assessment or Statement will be needed for a proposed development local planning authorities should take into account the following considerations:	
	• the Transport Assessment and Statement policies (if any) of the Local Plan;	
	• the scale of the proposed development and its potential for additional trip generation (smaller applications with limited impacts may not need a Transport Assessment or Statement);	
	• existing intensity of transport use and the availability of public transport;	
	• proximity to nearby environmental designations or sensitive areas;	

	• impact on other priorities/strategies (such as promoting walking and cycling); • the cumulative impacts of multiple developments within a particular area; and • whether there are particular types of impacts around which to focus the Transport Assessment or Statement (eg assessing traffic generated at peak times)	
Luton Local Plan 2011-2031 (2017) (CD 09.07)	Luton's Local Plan 2011-2031 seeks to encourage the use of sustainable transport measures in accordance with the airport's surface access strategy, updated periodically. **Policy LLP6** The London Luton Airport Strategic Allocation (approximately 325 hectares) includes land within the airport boundary, Century Park and Wigmore Valley Park (as identified on the Policies Map). The allocation serves the strategic role of London Luton Airport and associated growth of business and industry, including aviation engineering, distribution and service sectors that are important for Luton, the sub-regional economy, and for regenerating the wider conurbation.	The Transport Assessment and Travel Plan prioritise and promote modal shift to more sustainable modes of transport It could go further by introducing additional measures to reduce net GHG emissions generated by surface access traffic The Transport Assessment determined that the impact on the highway network is negligible. Consequently the existing highway infrastructure is suitable and improvements are not necessary for an 18-19mppa increase. The Travel Plan included a parking assessment, which concluded extra parking is not required and may further encourage use of private cars. No additional parking provision is included.

	Airport Safeguarding **A.** Development that would adversely affect the operational integrity or safety of London Luton Airport will not be permitted. With respect to operational and national security considerations, this includes (but is not limited to) concerns over the height of buildings, lighting, bird activity, and proximity to Public Safety Zones. Refer to Policy LLP34 for the Local Plan policy for the Public Safety Zones. Airport Expansion **B.** Proposals for expansion of the airport and its operation, together with any associated surface access improvements, will be assessed against the Local Plan policies as a whole taking account of the wider sub-regional impact of the airport. Proposals for development will only be supported where the following criteria are met, where applicable/ appropriate having regard to the nature and scale of such proposals: **i.** they are directly related to airport use of development; **ii**. they contribute to achieving national aviation policies; **iii.** are in accordance with an up-to-date Airport Master Plan published by the operators of London	The provision of the bus/coach terminal acts as a connection to the busway and cross boundary bus services. The Travel Plan and Transport Assessment expand upon the terminal facilities and promote the use of bus and coach services. The Travel Plan and Transport Assessment encourage modal shift, thereby reducing congestion and risk to safety. The Travel Plan encourages modal shift. Deterioration in highway safety and convenience not expected as a result of this application.

	Luton Airport and adopted by the Borough Council; **iv.** they fully assess the impacts of any increase in Air Transport Movements on surrounding occupiers and/or local environment (in terms of noise, disturbance, air quality and climate change impacts), and identify appropriate forms of mitigation in the event significant adverse effects are identified; **v.** achieve further noise reduction or no material increase in day or night time noise or otherwise cause excessive noise including ground noise at any time of the day or night and in accordance with the airport's most recent Airport Noise Action Plan; **vi.** include an effective noise control, monitoring and management scheme that ensures that current and future operations at the airport are fully in accordance with the policies of this Plan and any planning permission which has been granted; **vii.** include proposals that will, over time, result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents, occupiers and users of sensitive premises in the area, through measures to be taken to secure fleet modernisation or otherwise;	

	viii. incorporate sustainable transportation and surface access measures that, in particular, minimise use of the private car, maximise the use of sustainable transport modes and seek to meet modal shift targets, all in accordance with the London Luton Airport Surface Access Strategy; **ix**. incorporate suitable road access for vehicles including any necessary improvements required as a result of the development. Airport-related Car Parking **C.** Proposals for airport-related car parking should be located within the Airport Strategic Allocation, as shown on the proposals plan (excluding Century Park and Wigmore Valley Park) and will need to demonstrate that the proposals: meet an objectively assessed need; do not adversely affect the adjoining highway network; and will not lead to the detriment of the amenity of the area and neighbouring occupiers. Proposals for airport-related car parking outside this area will only be permitted where: there is demonstrated to be a long-term car parking need that cannot be met at the airport; they accord with the sustainable development principles as	

	defined by the plan as a whole; they relate well to the strategic road network and do not exacerbate traffic congestion; they do not have an adverse impact on amenity; and are in accordance with the most recently approved London Luton Airport Surface Access Strategy. Century Park **D.** Development of Century Park will be supported where proposals make provision for office, manufacturing and distribution employment. Particular support will be given and provision made for engineering and manufacturing for both aerospace and automotive purposes that demonstrate a need to locate close to the airport. In addition, a range of accommodation types, including small scale affordable B2 units to facilitate the expansion and relocation of existing Luton-based businesses, new business start-ups as well as significant inward investments, will be allowed provided that it does not generate bad neighbour issues. Warehousing-only developments must demonstrate a need to co-locate near the airport. Small scale retail, related services and leisure (as defined in Use Classes A1 to A3 and D2) will be permitted in order to	

	serve the needs, primarily, of employees in the area, as well as a hotel (Use Class C1). The Council will require proposals to be subject to a comprehensive development brief or Master Plan, which shall set out the proportion and phases of development and which shall include the following: **i.** details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percival Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency; and **ii.** secure opportunities to link site access via walking, cycling and bridleways to the wider network of routes via Wigmore Valley Park and access to the countryside to the east and south. Wigmore Valley Park **E.** Wigmore Valley Park is integral to the London Luton Airport Strategic Allocation. In delivering development and access under clause D (i.e. Century Park) above, including any	

	reconfiguration of the land uses that may be necessary, the following criteria will need to be satisfied: **i.** provision will be made to ensure that the scale and quality of open space and landscaping in the area is maintained and, if feasible, ensure that there is a net increase in open space provision; **ii.** bio-diversity will be enhanced and improved within the Borough; **iii**. that the new open space to replace Wigmore Valley Park offers facilities of at least 4 . Spatial Strategy Luton Local Plan (2011-2031) November 2017 33 equal quality and is available and accessible before any development takes place on the existing Wigmore Valley Park; **iv.** the long term management of open space, landscaping and bio-diversity interest is compatible with that for safe airport operations and will be of a high quality and secured though a legal agreement establishing long term funding. Design and Drainage **F.** Development proposals for the London Luton Airport Strategic Allocation will ensure: **i**. appropriate strategic landscaping to be provided both on and off-site, which shall have regard to the potential for	

significant visual prominence within the wider area of built development at Century Park and which does not increase risk to aviation operations arising from structures, lighting, bird strike or open water and having regard to operational and national security considerations;

ii. the height and design of buildings will reflect the site's rural fringe setting, its high visibility from surrounding countryside and its proximity to London Luton Airport;

iii. provision is made for sustainable drainage and the disposal of surface water in order to ensure protection of the underlying aquifer and prevent any harm occurring to neighbouring and lower land; and

iv. that development proposals, where applicable / appropriate will fully assess the impacts upon heritage assets and their setting, and should be designed to avoid harm to the setting of any heritage assets. Proposals will be considered in line with Policy LLP30 (historic environment).

Policy LLP31 – Sustainable Transport Strategy.
The strategy for sustainable transport in Luton is based on the vision for the Local Transport Plan 2011-

	2026, which is to ensure that an integrated, safe, accessible, and more sustainable transport system supports the economic regeneration and prosperity of the town. **A.** The Council will work with its partners, agencies and developers to deliver: **i.** reduced congestion around the town centre and key strategic routes including seeking to deliver targeted road and junction improvements needed to accommodate Luton's growth including strategic and local improvements to address cross boundary growth while promoting sustainable modes of transport; **ii.** sustainable connections via the Luton Dunstable busway serving the conurbation with potential links to neighbouring authorities and key developments in Luton; **iii.** improved accessibility and connectivity for a more pedestrian friendly town centre environment for all users; **iv.** controlled parking within the town centre, district, and neighbourhood centres to support sustainable local service delivery, housing, and jobs, linked trips and accessible destinations; and **v.** controlled freight traffic and facilities by using traffic management on	

	key corridors and routes into Luton and potential development sites on its borders. **B.** Planning Permission will be granted for proposed developments that meet the criteria below, where these are relevant to the proposal: **i.** minimises the need to travel; **ii.** provides a sustainable transport choice with priority for buses, pedestrians, and cyclists; **iii.** reduces road congestion particularly at peak times; **iv**. reduces the safety risk to motor vehicles, non-motorised, and vulnerable users; **v.** provides cycle parking / storage; and **vi.** ensures the quality of the local environment is not compromised. **C.** Transport Assessments, Transport Statements, and Travel Plans should be provided for developments (as set out in Appendix 7) and should conform to the stated requirements. London Luton Airport **D.** Support for the continued economic success of London Luton Airport as a transport hub (policy LLP6) will be delivered through: measures to ensure there is capacity at strategically important junctions; and continued enhancement of	

	sustainable modes of transport via the Airport Surface Access Strategy. Improvements Needed and Safeguarded Land **E.** The following strategic infrastructure schemes are needed to support proposed development and land is safeguarded for this purpose where needed as shown on the Policies Map: Luton Airport Parkway Railway Station North Entrance - dedicated tunnel to accommodate a feasible and viable public transport based solution linking to the airport Century Park Link - Access road to Century Park East Luton Circular Road (North including the Weybourne Link)* Luton Railway Station improvements **F.** In addition to the above new sections of road, the following junctions on the priority traffic network in Luton will require improving to cater for increased travel generated, in particular by strategic allocations both within Luton and neighbouring areas, some of which may require additional land to be safeguarded as shown on the Policies Map: New Bedford Road / Austin Road / Kingsdown Avenue signals - widening of New Bedford Road approaches. Chapel Viaduct / Castle Street	

| | roundabout - conversion to signal control or grade separation. Hatters Way / Chaul End Lane roundabout - additional approach lanes on Hatters Way (sign cyclists via underpass/ busway route). Vauxhall Way / Crawley Green Road - additional/longer approach lanes on Vauxhall Way. Vauxhall Way / Stopsley Way / Hitchin Road - additional approach lanes on Stopsley Way & Vauxhall Way (includes dedicated slip for this left turn movement). Vauxhall Way / Eaton Green Road - additional approach lanes. Kimpton Road / Vauxhall Way roundabout - replace roundabout with signals. Hitchin Road / Stopsley Way / Ashcroft Road – improvements to existing roundabout. Old Bedford Road / Barnfield Avenue signals - additional approach lanes on Barnfield Avenue. Eaton Green Road / Lalleford Road roundabout - additional approach lanes on Eaton Green Road. Old Bedford Road / Stockingstone Road signals - additional approach lanes on Old Bedford Road (south)

Footnote: * The East Luton Circular Road is a safeguarded route option and is not currently a formal transport proposal. Any road proposal will be considered against | |

	national policy and guidance, local plan policy, and legislative requirements relating to heritage, biodiversity, and landscape. **Policy LLP32** - Parking Parking provision in Luton will be managed to ensure that a proportionate number of spaces are available to support the growth of the town centre. **A.** Proposals for reducing on-street parking in and around the town centre and for car free development may be supported in areas of high public transport accessibility including when linked to park and ride facilities, provided that: **i.** there is no adverse impact on occupier amenity in other areas through displaced on street parking; **ii**. they are supported with a travel plan that promotes car clubs where feasible; and **iii.** the impact on short-term parking is minimised. Parking provision will be stringently controlled at London Luton Airport (in line with Policy LLP6C). Parking provision at the Luton & Dunstable Hospital will be stringently controlled to ensure that on site provision is prioritised.	

	B. Development will be permitted providing that: **i.** car parking provision should not exceed the maximum standards set out in Appendix 2 in order to promote modal shift, however within those standards, sufficient parking should be provided to help ensure that adverse effects on highway safety and the convenience of nearby residents and users are avoided; **ii.** minimum cycle parking standards set out in Appendix 2 is provided for non-residential developments; **iii.** cycle storage of an appropriate standard is provided for residential developments; and **iv.** parking standards shown in Appendix 2 are minimised in identified areas demonstrated to be of high accessibility.	
Luton Local Transport Plan 3 (2011-2026) (CD12.08)	Luton's Local Transport Plan 3, now superseded, sets the policy framework from which decisions related to transport are taken. Relevant policies include: **Policy 1:** Congestion Priorities. In managing congestion, priority will be given to delivering measures along those corridors where the highest levels of congestion occur, including: • the corridor between Luton and Dunstable/Houghton Regis; • routes between	The Transport Assessment identifies no significant increase in traffic. The Travel Plan sets out varies improvements to passenger transport services. The application has a minimal effect on the highway network when considered alongside other modal shift improvements, hence additional highway improvements not being considered necessary.

	Luton town centre and residential areas in the north and east of the town. Prioritisation of spending/measures will also be linked to their economic impacts, so that those measures offering the greatest economic benefits are prioritised.

Policy 2: Passenger Transport Improvements Strategic journeys between Luton and the surrounding growth areas will be improved through the on-going implementation of the Luton Dunstable Busway and subsequent extensions, together with other bus network improvements focussing on the priority corridors identified in Policy 1, including provision of Park & Ride services in partnership with Central Bedfordshire Council and Hertfordshire County Council. We will build upon the existing Bus Quality partnership with Arriva and develop a Punctuality Improvement Partnership between the Council and bus operators. We will also work in partnership with train operating companies and Network Rail to implement rail station improvements, enhance rail services, develop rail station travel plans and integrate bus and rail services.
Policy 3: Highway Improvements. Luton | The Travel Plan included a parking assessment and concluded that additional parking is not required.

The Travel Plan sets out a range of targets and measures to increase modal shift in favour of sustainable transport.

Travel Plan and Transport assessment provide incentives to move to zero emission vehicles for remaining car journeys.

Use of Real Time Passenger Information and Smart ticketing covered by Travel Plan and Transport Assessment.

The Transport Assessment and Travel Plan identify the need to improve and expand the cycling and walking network. |

	Council will investigate and deliver transport network management and efficiency improvements on congested roads before providing new highway infrastructure. Where modal shift and network management are insufficient to manage congestion on the priority corridors (see Policy 1), the Council will look to support additional highway improvements to reduce congestion and improve journey times. Network capacity improvements, including junction improvements, will be undertaken where their impact benefits the road network as a whole and will be carried out within the existing highway boundaries, where practicable. New road building will only be supported where it facilitates growth and improves access to strategic employment sites. **Policy 4:** Parking Car parking provision in Luton town centre will be managed in such a way that it favours short stay demand and will be limited to the current number of parking spaces. We will look to reduce on-street parking if parking capacity increases at Park & Ride sites on the periphery of Luton. Additional parking provision may be appropriate at rail stations and other public transport	

	interchange locations on Luton's periphery (such as Park & Ride) to encourage the use of rail and bus to access the town centre. Maximum parking standards at new developments will be established through the Luton and southern Central Bedfordshire Local Development Framework. **Policy 6:** Smarter Choices Our main focus for managing congestion and reducing greenhouse gas emissions will be through the intensive 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 priority will be to promote the use of bus services, walking and cycling between people's homes, the town centre, other key employment areas and local hubs/community facilities, with the highest priority being afforded to promoting sustainable travel between Luton and Dunstable/Houghton Regis. **Policy 7:** Improving Energy Efficiency For those car journeys that remain, we will look to encourage people to drive in a more carbon efficient manner through eco-driving and also promote low carbon vehicle and	

	alternative fuel use through the provision of infrastructure for low emission vehicles, such as electric vehicle recharging points and preferential parking. We will also lead by example by examining our corporate use of transport and by exploiting opportunities to both save money and reduce carbon emissions through the minimisation of our own energy use and requirements for transport infrastructure, such as through the use of low energy street and traffic lights. **Policy 18:** Use of the Transport Network by Mobility Impaired People Key priorities will be: • Ensuring that all bus services are fully accessible, be they commercial services, those subject to council tendering arrangements or the council's own fleet of vehicles; • Ensuring people, especially those with mobility problems, are able to use the footway network to access passenger transport services. The further provision of dropped kerbs will be essential, as will improving bus stops by providing raised kerbs to enable "level boarding". The priorities will be dropped kerbs and raised bus stops: • Along all routes served by Luton Dunstable Busway	

	services; o Near nursing or residential homes or sheltered housing; • Near GP surgeries; o Serving local facilities and services; • Serving key bus corridors (see Policy 2) • Serving the town's three rail stations; • Working with rail operators to ensure all three stations become fully accessible by providing step-free access; • Continuing to support Government initiatives on concessionary fares for older people and for those with disabilities; • Ensuring that high quality information about bus services is made available to users, including at the roadside, through electronic media and in printed form. We will in particular continue to roll out the provision of Real Time Passenger Information, especially at the bus stops themselves; • Working with the operators to help facilitate joint ticketing arrangements or the use of smartcard technology. Walking and Cycling We will continue to implement a high quality, direct, convenient and safe Strategic Cycle Network of both on- and off-road routes, with priority in areas where: • Access to key local services by bicycle is above average for Luton in terms of distance but where safe	

	routes are needed to take advantage of this; • The terrain is relatively flat and cycleable; • Efforts are being focused on reducing congestion through modal shift for peak time journeys to work and school, including towards more walking and cycling; • There is evidence to suggest that low levels of physical activity are leading to levels of child obesity that exceed the national average; • There are high levels of deprivation, especially health deprivation, and where the level of car ownership is low; • High levels of housing or employment growth are being planned. 53 54 We will develop a series of short Core Walking Routes that will: • Improve access to the town centre and other concentrations of local facilities and services; • Provide a high quality, safe and attractive walking environment; • Provide a focus for street scene improvements.	
Luton Local Transport Plan 4 (2020-2040) (CD 12.07)	This Local Transport Plan post-dates the application. Luton's Local Transport Plan 4 (2020-40), adopted in 2021 provides a policy framework from which decisions on investment in the local transport system are taken **Policy 1:** Shared Mobility and Mobility as a service.	The Transport Assessment and Travel Plan identify shared mobility as measure to reduce the carbon intensity of surface access. The Travel Plan encourages employee modal shift for passengers and staff

	We will work with developers and other partners to gradually introduce and actively promote a range of initiatives to encourage shared transport including: Bike and electric scooter share schemes, Demand responsive public transport, car sharing as part of employee and school travel plans, Car clubs in residential areas. **Policy 2:** Walking and Cycling. We will continue to implement a high quality, direct, convenient and safe cycle and pedestrian network of both on and off road routes with priority in areas where: Access to key local services by bicycle is above average for Luton in terms of distance but where safe routes are needed to take advantage of this, the terrain is relatively flat and cycleable, Efforts are being focused on reducing congestion through modal shift for peak time journeys to work and school including towards more walkig and cycling, Evidence states that low levels of physical activity are leading to childhood obesity that exceed the national average, There are high levels of deprivation or high levels of housing or employment growth are being planned. **Policy 4:** Improving public transport. We will	through a reduction in private car use and increases in sustainable transport. The Travel Plan promotes smarter/integrated ticketing, real time passenger information and the provision of electric charge points in cars and promotion of low carbon vehicles via preferential parking and provision of charge points but could go further by introducing additional measures to reduce net GHG emissions generated by surface access traffic The Transport Assessment determined that highway improvements are not required for an increase from 18m to 19mppa.

	undertake a review of the public transport network, building upon the Luton Dunstable busway as a key spine including: Identify locations through the local plan review and in conjunction with neighbouring councils for strategic mobility hubs (including park and ride services) where key radial routes across the fringe of the expanded conurbation with bus priority routes through the urban extensions and on in to the town centres. Require new developments to facilitate good access to public transport, including where appropriate busway extensions. Create local mobility hubs focussed around community facilities in suburban areas. Facilitate better interchange between rail services and local bus services. Develop a range of ticketing initiatives to facilitate better integration between bus services including multi bus operator smartcard ticketing. **Policy 5:** Smarter Choices. Our main focus for managing congestion and reducing greenhouse emissions will be through; the intensive application of smarter choices measures to encourage modal shift away from single occupancy car use and towards sustainable transport choices particularly through the	

workplace or school travel planning processes. Promote the use of bus services walking and cycling between people's homes, the town centre, other key employment areas and the local hubs/community facilities, with the highest priority being afforded to promoting sustainable travel between Luton and Dunstable/Houghton Regis.

Policy 6: Ultra Low Emission and electric vehicles. In order to promote and encourage use of Ultra Low Emission and Electric Vehicles we will; Increase the provision of electric charging points across the borough. Set a requirement for developers to provide one chargepoint per residential parking space and one chargepoint for every ten spaces in non-residential building with more than 20 car parking spaces, with passive provision to provide chargepoints at the remaining spaces.

Policy 7: Improving energy efficiency. For those car journeys that remain we will look to: encourage people to drive in a more carbon efficient manner through eco driving and promote low carbon vehicle and alternative fuel use through the provision of infrastructure for low emission vehicles, such

	as electric charging points and preferential parking. We will also lead by example, examining opportunities to both save money and reduce carbon emissions of our corporate transport and energy use, including transport energy requirements including the use of low-energy traffic signals and street traffic lights. **Policy 9:** Highway Improvements. We will take the following approach to implementing highway improvements; Investigate and deliver transport network management and efficiency improvements on congested roads in the priority travel corridor, including taking account of expected modal shift, before providing new highway infrastructure. Where additional highway improvements are required to manage congestion and improve journey times we will undertake those network capacity improvements, including junction improvements within the existing highway boundary where possible and only then will new road building be undertaken where their impact benefits the road network as a whole and where it facilitates growth and improves access to strategic employment sites.	

Luton Corporate Plan (2021-2023) (CD12.09)	**P.32** London Luton Airport has set out its ambition to be the most sustainable airport in the UK and will develop and deliver its own action plan to achieve this.	The Travel Plan and Transport Assessment sets out ambitious targets and measures to support sustainable travel.
Luton Economic Recovery Plan (2020-2022) (CD12.10)	**P.3** Airport will be at full capacity, providing maximum benefit to jobs and the economy	The application to grow the airport from 18-19mppa is predicated on the economic benefits and increase employment opportunities.
Luton Population Wellbeing Strategy (2019-2024) (CD12.11)	**Appendix A.** Growing the local economy by building on the work of the Luton Investment Framework to secure inward investment and support business start-ups and growth in key sectors including the airport.	The application to grow the airport from 18-19mppa is predicated on the economic benefits and increase employment opportunities.