

PROOF OF EVIDENCE**Highways**

On behalf of

LUTON BOROUGH COUNCIL

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

Chris Godden FIHE

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

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1. Introduction

- 1.1 This proof of evidence has been prepared by Christopher Godden, Highway Development Control Manager (Planning) at Luton Borough Council. I am a Fellow of the Institute of Highway Engineers. I have over 30 years' experience in Highway matters in Local Government and in private practice in Bedfordshire and Hertfordshire, working as an Engineer in highways, drainage and potable water supply.
- 1.2 This document has been prepared on behalf of the Council (Luton Borough Council) in respect of the planning application by London Luton Airport (Application Reference 21/000131/VARCON)
- 1.3 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 Scope of Evidence

- 2.1 On the 11th January 2021 Luton Council received application ref 21/00031/VARCON, as a variation of conditions to a previous approved application 15/00950/VARCON, to increase the cap on passengers from 18mppa to 19mppa and to amend the day and night noise contours. The application consisted of a suite of documents in support. In my role as Highway Development Control Manager I was consulted and asked to comment on the proposals with regard to highway matters. In this respect two documents, the Transport Assessment and the Travel Plan are particularly pertinent.
- 2.2 The Transport assessment dated December 2020 was prepared by Wood Environment and Infrastructure Solutions UK Ltd. It was prepared to a scope agreed by my predecessor at Luton Council and Highways England (now National Highways). The assessment set out the development proposals, national and local policy, existing sustainable transport networks and outlined road safety considerations. Subsequently the report went on to evaluate current and future travel demand. 2019 traffic flows for the 18 mppa scenario and 2024 forecast traffic flows for the 19 mppa scenario were established by ARUP using their approved forecasting model. The 2019 18 mppa traffic flows were established based on factual data supplied by York Aviation. The 2024 19 mppa traffic flows were established based on the 19 mppa aircraft flow forecast supplied by York Aviation.
- 2.3 The Travel Plan dated December 2020 was prepared by Wood Environment and Infrastructure Solutions UK Ltd. The Travel Plan set out objectives and targets with a series of measures on the promotion of sustainable modes (use of public transport, walking and cycling) and reducing single car occupancy for both passengers and staff. The targets were updated following a review of the London Luton Airport (LLA) Airport Surface Access Strategy (ASAS) 2018 – 2022 against the latest passenger and staff travel figures from the latest Civil Aviation Authority (CAA) statistics and 2019 LLA Staff Travel Survey. The Travel Plan set out the planning application proposals, up-to-date and relevant

national and local policy context, and existing sustainable transport networks. A section on future public transport networks highlighted the construction of the Luton Direct Air Rail Transit (DART) which at the time of writing the Travel Plan was due for completion in Autumn 2021. The DART will have a moderate positive impact on local traffic congestion and emissions to the airport as well as boost rail modal share for both passengers and staff. The Travel Plan document included an assessment of current site travel patterns for both passengers and staff as well as an assessment of existing targets as set out in the ASAS 2018 – 2022. Finally, objectives and more stretching targets were set with a series of measures based on the latest results from CAA and the staff travel survey. An action plan then set out each of the measures against timescales for completion and the body responsible for actioning them.

- 2.4 The Car Parking Management Plan was submitted as appendix A to the Travel Plan document.

3 Conclusions drawn

- 3.1 My comments on the original application stated: "It is accepted that the increase in from 18mppa to 19 mppa will not result in a significant impact on the existing transport network.
It is unfortunate that no cycling improvements are to be made as a result of this submission given the reduction in use of cycles as a means of staff travel to work reported and the statement in the report that there is a large proportion of staff that are potentially capable of travel behavioural change if the right measures are put in place to promote cycling. The highway authority would encourage that proposals be put forward to promote and encourage the use of cycles as a means to travel to work."
- 3.2 I accepted the assertion made in the Transport Assessment that a worst case scenario of a rise to 19mppa throughput of passengers could be expected by 2024 given that the Covid situation made predicting recovery difficult, particularly at the time of application the airport operators were best placed to determine this. Subsequently 19mppa is now expected to be reached in year 2025.
- 3.3 The approved Arup traffic forecasting model demonstrates that the effect on traffic in the a.m. and p.m. peak periods is minor and will not have a significant effect on the surrounding road network. The model was also run without the benefits of the Direct Air Rail Transit (DART) being included, the opening of the DART, expected Autumn 2022, is likely to encourage rail use by airport users further reducing the effect on traffic, albeit moderate positive.
- 3.4 The transport model also did not include for the benefits of methods to be introduced in the Travel Plan, further to that the airport is developing a new Surface Access Strategy that will further encourage the use of sustainable means to access the airport. These matters were considered as part of my assessment of the planning application and gave further confidence that the effect of the proposal on the road network would be minimal.
- 3.5 The model was originally developed by Arup specifically for the airport expansion, although it was based on the base year trip matrices for the Central Beds and Luton Transport Model developed by Aecom in 2016/17 updated

using traffic counts undertaken by Arup in Autumn 2017 and Spring 2018. The model was approved by my predecessor John Maple who had 20 plus years' experience working in highway development control in Luton.

- 3.6 The method used to assess collision data was considered acceptable and followed the approach used nationally, based on collision cluster sites.
- 3.7 The assertion made by the applicant that limiting car parking encourages a shift to public transport is largely correct. Some car parking will migrate to surrounding areas, however. Luton Council is considering an expansion of the controlled parking zone in the airport area and will introduce this if justified.
- 3.8 The applicant demonstrated that by the time of application was submitted, it had met the key surface access targets on sustainable transport for 2022 for both staff and passengers. As a result, more ambitious targets were set in the Travel Plan submitted with the application.
- 3.9 My assessment concluded that the application as submitted did not have an unacceptable impact on highway safety and the residual cumulative impacts on the road network were not severe. As refusal of the application on highway grounds would not meet the requirements of paragraph 111 of the NPPF.
- 3.10 My assessment concluded that consideration was given to the promotion of sustainable transport modes via the Transport assessment and the continued development of the airport's Travel Plan and Surface Access Strategy in accordance with paragraphs 104, 111, 112 and 113 of the NPPF.
- 3.11 It was noted that there was a particular lack of facilities for staff cycling to the airport and given the reduction in cycle use as a means of travel to work improvements to cycle infrastructure were requested as part of any planning approval.
- 3.12 The application was found to meet the national and Luton policies as detailed in the table in Appendix A.

Appendix A: Key National and Local Policy/Guidance

National/Local Policy	Wording	Met by
<p>Jet Zero Strategy: Delivering net zero aviation by 2050 (CD 11.19)</p>	<p>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.</p> <p>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.</p>	<p>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.</p> <p>Targets set out in the Travel Plan have been updated following a review of the London Luton Airport Surface Access Strategy 2018-2022.</p>
<p>Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (ANPS) (2018) (CD 8.04)</p>	<p>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.</p> <p>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</p>	<p>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.</p>

	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.	
Decarbonising transport: setting the challenge (2020) (CD 11.08)	<p>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.</p> <p>2.49 Airport expansion is a core part of boosting global connectivity and levelling up across the UK.</p>	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>P.121 Government will consult on a target for UK domestic aviation to reach net zero by 2040</p> <p>P.121 Government will consult on a target for decarbonising emissions from airport operations in England by 2040.</p>	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	<p>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.</p> <p>The applicant has a well-established Airport Travel</p>

	<p>the use of public transport and minimise congestion, emissions and other local impacts</p> <p>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.</p>	<p>Forum and intends to increase its membership.</p>
<p>National Planning Policy Framework (2021) (CD 09.05)</p>	<p>104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <p>(a) the potential impacts of development on transport networks can be addressed;</p> <p>(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;</p> <p>(c) opportunities to promote walking, cycling and public transport use</p>	<p>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.</p> <p>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.</p> <p>The Transport Assessment and Travel Plan are comprehensive and encourage a shift to sustainable forms of surface access.</p>

	<p>are identified and pursued;</p> <p>(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</p> <p>(e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.</p> <p>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.</p> <p>112. Within this context, applications for development should:</p> <p>(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</p>	
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	<p>other public transport services, and appropriate facilities that encourage public transport use;</p> <p>(b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;</p> <p>(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;</p> <p>(d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and</p> <p>(e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.</p> <p>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.</p>	
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<p>Planning Practice Guidance: Travel Plans, Transport Assessments and Statements (2014) (CD12.12)</p>	<p>Para 002 Travel Plans, Transport Assessments and Statements are all 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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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); 	<p>The application is supported by a Travel Plan and Transport Assessment.</p>
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	<ul style="list-style-type: none"> • the cumulative impacts of multiple developments within a particular area; • 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 <p>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:</p> <ul style="list-style-type: none"> • 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 	
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	<p>availability of public transport;</p> <ul style="list-style-type: none"> • 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)	<p>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.</p> <p>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,</p>	<p>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</p> <p>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.</p>

	<p>including aviation engineering, distribution and service sectors that are important for Luton, the sub-regional economy, and for regenerating the wider conurbation.</p> <p>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.</p> <p>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:</p>	<p>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.</p> <p>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.</p> <p>The Travel Plan and Transport Assessment encourage modal shift, thereby reducing congestion and risk to safety.</p> <p>The Travel Plan encourages modal shift. Deterioration in highway safety and convenience not expected as a result of this application.</p>
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	<p>i. they are directly related to airport use of development;</p> <p>ii. they contribute to achieving national aviation policies;</p> <p>iii. are in accordance with an up-to-date Airport Master Plan published by the operators of London Luton Airport and adopted by the Borough Council;</p> <p>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;</p> <p>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;</p> <p>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;</p> <p>vii. include proposals that will, over time, result in a significant diminution and</p>	
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	<p>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;</p> <p>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;</p> <p>ix. incorporate suitable road access for vehicles including any necessary improvements required as a result of the development.</p> <p>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</p>	
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	<p>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.</p> <p>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</p>	
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	<p>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:</p> <ul style="list-style-type: none"> 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 	
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	<p>Wigmore Valley Park and access to the countryside to the east and south.</p> <p>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:</p> <ul style="list-style-type: none"> 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 	
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	<p>though a legal agreement establishing long term funding.</p> <p>Design and Drainage</p> <p>F. Development</p> <p>proposals for the London Luton Airport Strategic Allocation will ensure:</p> <p>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;</p> <p>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;</p> <p>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</p> <p>iv. that development proposals, where applicable / appropriate will fully assess the impacts upon heritage assets and their setting, and should be designed</p>	
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	<p>to avoid harm to the setting of any heritage assets. Proposals will be considered in line with Policy LLP30 (historic environment).</p> <p>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.</p> <p>A. The Council will work with its partners, agencies and developers to deliver:</p> <ul style="list-style-type: none"> 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; 	
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	<p>iii. improved accessibility and connectivity for a more pedestrian friendly town centre environment for all users;</p> <p>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</p> <p>v. controlled freight traffic and facilities by using traffic management on key corridors and routes into Luton and potential development sites on its borders.</p> <p>B. Planning Permission will be granted for proposed developments that meet the criteria below, where these are relevant to the proposal:</p> <p>i. minimises the need to travel;</p> <p>ii. provides a sustainable transport choice with priority for buses, pedestrians, and cyclists;</p> <p>iii. reduces road congestion particularly at peak times;</p> <p>iv. reduces the safety risk to motor vehicles, non-motorised, and vulnerable users;</p> <p>v. provides cycle parking / storage; and</p> <p>vi. ensures the quality of the local environment is not compromised.</p> <p>C. Transport Assessments, Transport</p>	
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	<p>Statements, and Travel Plans should be provided for developments (as set out in Appendix 7) and should conform to the stated requirements.</p> <p>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.</p> <p>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</p> <p>F. In addition to the above new sections of road, the</p>	
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	<p>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</p>	
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	<p>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)</p> <p>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.</p> <p>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.</p> <p>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:</p> <p>i. there is no adverse impact on occupier</p>	
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	<p>amenity in other areas through displaced on street parking;</p> <p>ii. they are supported with a travel plan that promotes car clubs where feasible; and</p> <p>iii. the impact on short-term parking is minimised.</p> <p>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.</p> <p>B. Development will be permitted providing that:</p> <p>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;</p> <p>ii. minimum cycle parking standards set out in Appendix 2 is provided for non-residential developments;</p> <p>iii. cycle storage of an appropriate standard is provided for residential developments; and</p> <p>iv. parking standards shown in Appendix 2 are minimised in identified</p>	
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	areas demonstrated to be of high accessibility.	
Luton Local Transport Plan 3 (2011-2026) (CD12.08)	<p>Luton's Local Transport Plan 3, now superseded, sets the policy framework from which decisions related to transport are taken. Relevant policies include:</p> <p>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 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.</p> <p>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</p>	<p>The Transport Assessment identifies no significant increase in traffic.</p> <p>The Travel Plan sets out various improvements to passenger transport services.</p> <p>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.</p> <p>The Travel Plan included a parking assessment and concluded that additional parking is not required.</p> <p>The Travel Plan sets out a range of targets and measures to increase modal shift in favour of sustainable transport.</p> <p>Travel Plan and Transport assessment provide incentives to move to zero emission vehicles for remaining car journeys.</p> <p>Use of Real Time Passenger Information and Smart ticketing covered by Travel Plan and Transport Assessment.</p> <p>The Transport Assessment and Travel</p>

	<p>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.</p> <p>Policy 3: Highway Improvements. Luton 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,</p>	<p>Plan identify the need to improve and expand the cycling and walking network.</p>
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	<p>where practicable. New road building will only be supported where it facilitates growth and improves access to strategic employment sites.</p> <p>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.</p> <p>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</p>	
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	<p>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.</p> <p>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.</p> <p>Policy 18: Use of the Transport Network by Mobility Impaired People</p>	
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	<p>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</p>	
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	<p>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;</p> <ul style="list-style-type: none"> • Working with the operators to help facilitate joint ticketing arrangements or the use of smartcard technology. <p>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:</p> <ul style="list-style-type: none"> • 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 	
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	<p>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.</p>	
<p>Luton Local Transport Plan 4 (2020-2040) (CD 12.07)</p>	<p>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</p> <p>Policy 1: Shared Mobility and Mobility as a service. 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.</p> <p>Policy 2: Walking and Cycling. We will continue to implement a high quality, direct, convenient and safe cycle and</p>	<p>The Transport Assessment and Travel Plan identify shared mobility as measure to reduce the carbon intensity of surface access.</p> <p>The Travel Plan encourages employee modal shift for passengers and staff through a reduction in private car use and increases in sustainable transport.</p> <p>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</p>

	<p>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 walking 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.</p> <p>Policy 4: Improving public transport. We will 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</p>	<p>generated by surface access traffic</p> <p>The Transport Assessment determined that highway improvements are not required for an increase from 18m to 19m ppa.</p>
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	<p>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.</p> <p>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.</p> <p>Policy 6: Ultra Low Emission and electric vehicles. In order to</p>	
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	<p>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.</p> <p>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.</p> <p>Policy 9: Highway Improvements. We will take the following</p>	
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	<p>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.</p>	
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	The application to grow the airport from 18-19mppa is predicated on the economic benefits

	secure inward investment and support business start-ups and growth in key sectors including the airport.	and increase employment opportunities.
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