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Your Ref: TR020001
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Date: 4 April 2022

By Email Only

2022consultation@lutonrising.org.uk

Dear Mr Aldridge

Re: Application by Luton Rising for an Order granting Development Consent for the Expansion of London Luton Airport: Second Statutory Consultation Feb-April 2022

Thank you for the opportunity to comment on the above consultation.

Together with the other host authorities (Hertfordshire County Council (HCC) Central Bedfordshire Council (CBC), and Luton Borough Council (LBC)) North Hertfordshire Council has been engaging technically with you on your emerging scheme, both prior to and since the first statutory consultation. Under the terms of the Planning Performance Agreement the host authorities engaged specialist consultancy services to review your first statutory consultation material in 2019 and the outputs of that review informed our collective and individual responses to the consultation. The review has also informed the engagement we have had since then and influenced the scheme as it has evolved since.

Once again, under the provisions of the PPA, the host authorities have commissioned the same consultancy services to assist in responding to the second statutory consultation. Copies of which you will have received.

- Responses to Secondary Statutory consultation on Behalf of Host Authorities – HHC, NHDC, CBC and LBC – prepared by Vincent + Gorbing
- London Luton Airport Expansion: Review of Statutory Consultation Documents – prepared by WSP and SUONO on behalf of the Host Authorities HCC, NHDC, CBC and LBC.

This North Hertfordshire response is separate and in addition to the collective response of the four host authorities. We would like to take this opportunity to raise specific points and to reinforce a number of the outputs and comments made in the collective response as there are some topics which are of concern to us where there is still more information to be provided, clarity is sought, and further discussion would be needed and welcomed prior to the DCO application being submitted.

These include:

- Draft Green Controlled Growth
- Climate Change and GHG emissions
- Air Quality
- Noise and Vibration
- Landscape and visual effects including ecology and the future management of Wigmore Valley Park which we understand the replacement open space falls within the North Herts boundary
- Draft Employment and Training Strategy
- Community First Fund
- Surface Access

Our detailed comments and recommendations are set out in the appendix attached to this letter.

Yours sincerely,



Ian Fullstone

Strategic Director - Regulatory

North Hertfordshire Council

Appendix to letter ref TR020001

North Herts Council's detailed response to the Second Statutory Consultation (Feb-April 2022) on the application by Luton Rising for an Order granting Development Consent for the Expansion of London Luton Airport.

1 Abbreviations used

- ACP: Airspace Change Proposal
- AQMA: Air Quality Management Area
- CAA: Civil Aviation Authority
- DCO: Development Consent Order
- DETS: Draft Employment and Training Strategy
- DfT: Department for Transport
- DRT: Demand Responsive Transport (e.g. HertsLynx)
- EEH: England's Economic Heartland, the Sub-National Transport Body that includes Hertfordshire
- EIA: Environmental Impact Assessment
- ETS: LR Consultation document *Getting to and from the airport – our emerging transport strategy*
- DGCG: Draft Green Controlled Growth – a legally binding framework proposed to ensure environmental limits are observed as the airport grows
- GHG: greenhouse gas (notably carbon dioxide, methane, nitrous oxide and ozone)
- HCC: Hertfordshire County Council
- LBC: Luton Borough Council
- LCWIP: Local Cycling and Walking Infrastructure Plan
- LLA: London Luton Airport
- LTN1/20: [Local Transport Note 1/20](#): Cycling Infrastructure Design
- LTP4: Hertfordshire Local Transport Plan 4
- LR: Luton Rising, the trading name of London Luton Airport Ltd
- LVIA: Landscape and Visual Impact Assessment
- MRN: Major Road Network, which includes the A505
- LLM: Large Local Majors – nationally or regionally significant road schemes requiring more than £50m of DfT funding
- mppa: million passengers per annum, a measure of airport throughput
- NHC: North Herts Council
- NHDC: North Hertfordshire District Council (also known as North Herts Council)
- NHTS: [North Hertfordshire District Council Transport Strategy](#) (October 2017)
- PEIR: Preliminary Environmental Information Report. Postfixed numbers related to the volume and chapter of the report.
- SLMP: Strategic Landscape Masterplan
- SMFR: Strategic Modelling Forecasting Report for Luton Rising DCO (January 2022)
- STB: Sub-national Transport Body, responsible for setting long-term transport strategy for a region
- TSM: [Traffic Signs Manual](#). Note that TSM chapter 6 supersedes LTN 1/95: *The assessment of pedestrian crossings*.
- UFP: Ultrafine Particle – sub 0.1 microns in diameter.

2 Draft Green Controlled Growth

- 2.1 NHC is strongly supportive of the principle of having a GCG framework.
- 2.2 THE GCG framework proposes an ascending sequence of two Thresholds, followed by a Limit on four environmental “topics”:
 - Noise
 - Air quality
 - GHG emissions
 - Surface access
- 2.3 If the first Threshold is met, LR must produce a Level 1 Plan to ensure further expansion will not lead to a limit threshold being reached.
- 2.4 If the second Threshold is met, LR must stop increasing airport capacity until it has prepared a Level 2 Plan to ensure further expansion will not lead to a limit threshold being reached.
- 2.5 If the Limit (effectively the third Threshold) is met, LR must prepare a Mitigation Plan to bring the relevant environmental metric below the Limit.
- 2.6 The plan effectively makes the second Threshold a target, which would render the first Threshold meaningless.
- 2.7 Environmental metrics will follow utilised capacity, not available capacity. There will be a time lag between additional capacity being made available at the airport and that capacity being fully utilised. Environmental limits could therefore be exceeded sometime after additional airport capacity has been made available.
- 2.8 If a Mitigation Plan fails, environmental Limits could be exceeded indefinitely with no direct consequences for LR beyond not being able to expand airport capacity further.

2.9 Surface access

- 2.9.1 The Thresholds for Surface Access are set in terms of modal shares for public transport for passengers and ‘sustainable transport’ for employees. It would be more transparent if the targets were set in terms of the absolute number of car trips.
- 2.9.2 It is implied that the recorded mode will be the mode of arrival. It therefore needs to be established whether this will be a reliable metric if large numbers of people kiss-and-ride from the DART terminus or taking a park-and-ride bus from Butterfield Business Park. In both cases, the main trip mode is car.

2.10 Recommendations

- 2.10.1 On the DGCG framework, NHC asks LR to:
 - ♦ Refine the plan to provide greater certainty that environmental metrics will not be exceeded.
 - ♦ Explicitly set the first Threshold as the target, to create an adequate safety margin to allow for hysteresis (time lags between drivers and outcomes) and uncertainty about the effectiveness of mitigatory actions (which will, for the most part, be untested).
 - ♦ Add an additional step that, should a Mitigation Plan fail to achieve its objective within an agreed period of time, airport capacity must be ratcheted down until environmental targets are no longer exceeded.

- ◆ Agree with local authorities the capacity increment sizes and minimum time intervals between increases. The aim would be to ensure that the full environmental impacts are observed before capacity is increased further.
- ◆ Add a financial penalty for any breach of an environmental Limit threshold. Agree with local authorities an appropriate formula, based on the degree and duration of the exceedance for each environmental topic, and to whom it would be payable (e.g. the affected local authorities or the Communities First Fund – see **§Error! Reference source not found.**).

2.11 On surface access, NHC asks LR to:

- ◆ Convert the modal share targets to *absolute* numbers of car trips.
- ◆ Consider setting an ambitious target of *no net increase* in the absolute number of car trips.
- ◆ Consider a stretch target of *reducing* the absolute number of car trips over time.
- ◆ Consider replacing some or all of the currently proposed schemes to increase road capacity with interventions to increase rail and bus capacity to ensure that they can accommodate growing demand comfortably.
- ◆ If applicable, count park-and-ride bus trips separately to trips by local and intercity bus services, and count these as half-car-trips.
- ◆ Monitor how many people who arrive by DART drove, or were driven, to the DART terminus or a local railway station, and count these as car trips.

3 Climate Change and GHG emissions

3.1 LR make a distinction between *Net Zero* and *Carbon Neutral*, for instance in DGCG §1.1.2(i):

Further infrastructure enhancements and initiatives to support our goal of a net zero airport operation by 2040, with interventions to support carbon neutrality being delivered sooner including facilities for greater public transport usage, improved thermal efficiency, electric vehicle charging, on-site energy generation and storage, new aircraft fuel pipeline connection and storage facilities and sustainable surface and foul water management installations.

3.2 This distinction is not supported by definitions given by relevant established bodies (including the Carbon Trust and the IPCC). The terms are typically used synonymously in public discourse too.

3.3 Elsewhere in the DGCG, ‘carbon neutrality’ applies only to surface access and ‘net zero’ to ground operations.

3.4 Although LR have outlined a plan to achieve net zero, they have not provided evidence that the measures will be sufficient to achieve net zero for surface access or ground operations.

3.5 PEIR2 §12.2.16 mentions the Climate Change Act’s (amended) target of Net Zero by 2050. However, the government has also set milestones for decarbonisation, relative to 1990 levels:

- [68% by 2030](#) (UK’s Nationally Determined Contribution)
- [78% by 2035](#) (statutory)

- 3.6 In 2019, emissions were 43.8% down.¹ That means that, to meet the 2030 target, emissions must fall a further 24.2 percentage points, or 43% relative to 2019 levels (from 56.2% to 32%).
- 3.7 If aviation² is to be treated as an exception and permitted to contribute a smaller reduction in GHG emissions than required for the country as a whole, then the government (as the co-ordinator of sector decarbonisation plans) will need to identify which other sector(s) will decarbonise faster in order to offset the shortfall in aviation. There can of course be no double-counting of sectors.

3.8 Recommendations

- 3.8.1 NHC asks LR to:
- ◆ Use either 'net zero' or 'carbon neutral' consistently.
 - ◆ Be consistent and clear about what generators of emissions are included in any statements relating to achieving net-zero.
 - ◆ Set out how, and by how much, each action in the decarbonisation plan will contribute to achieving net-zero for surface access and ground operations.
 - ◆ Demonstrate how airport expansion will be consistent with the statutory decarbonisation milestones.

4 Air quality

- 4.1 Evidence is growing about the damage to health caused by particulate matter, nitrous oxides, ozone and volatile organic compounds.³
- 4.2 Urban populations' long-term exposure to harmful levels of air pollutants is responsible for between 28,000 and 36,000 premature deaths a year in the UK.
- 4.3 The World Health Organisation recommends much more stringent limit values for some key pollutants than those required by law. Growing interest in the health damage from particulate matter in particular suggests that it may be time to look again at the assumption that aircraft emissions at higher altitudes can be disregarded when assessing aviation's air quality impact.
- 4.4 In terms of population exposure, the EU Environment Agency has identified that significant proportions of EU urban populations are exposed to harmful levels of air pollutants in relation to WHO guidelines as follows:
- PM2.5: 74-85% of WHO Guideline
 - PM10: 42-52%
 - Ozone: 95-98%
 - NO₂: 7-8%
 - BaP: 85-90%
 - SO₂: 21-38%

¹ See [2019 UK Greenhouse Gas Emissions, Final Figures \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

² International aviation (and shipping) are excluded from the Nationally Determined Contributions, but included in the [Sixth Carbon Budget](#). Details will be confirmed in the upcoming Jet Zero Strategy.

³ See [Air pollution: applying All Our Health - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

- 4.5 PEIR2 chapter 7 acknowledges the existence of AQMAs in Hitchin, but provides no detail on the modelled impacts of additional traffic generated by the airport expansion.
- 4.6 PEIR2 chapter 7 does not cover ultrafine particles (UFPs).
- 4.7 The Air Quality Expert Group (Defra) produced a paper on UFPs in 2018. In summary:
- Current monitoring for UFPs is inadequate, and additional measurements are required in relation to poorly understood UFP emission sources such as airports. The group recommend establishment of UFP monitoring in the vicinity of a major airport, in order to understand the chemical composition of UFP in the atmosphere.
 - These particles are typically less than 0.1µm. They are usually quantified by their number concentration. Hence these particles are not addressed with current UK or EU Air Quality Regulations, and do not feature within the NAEI, National Emissions Inventory.
 - UFP penetrate deep into the respiratory system, allowing interactions with lung tissue and potential translocation into the blood stream. This, together with the hypothesis that the toxicity of particulate matter is governed by the surface area of the particles rather than their mass, has led to suggestions that ultrafine particles may be particularly harmful to health (HEI, 2013).
- 4.8 The European Airport Regions Conference in 2017 concluded that, “Supporting the reduction of Ultrafine particles (UFPs) to the minimum is crucial to preserve a comfortable and healthy lifestyle for residents living in airport regions.”
- 4.9 The Aviation Environment Forum (AEF) has made summary recommendations in relation to environmental policy challenges in relation to the Aviation Strategy.

4.10 Recommendations

4.10.1 NHC asks LR to:

- ◆ Identify the locations of all existing air quality monitoring stations.
- ◆ Agree with NHC the number and locations of new stations to monitor the impact of airport expansion on existing and future settlements (including the Local Plan site allocation EL1, EL2 & EL3 to the east of Luton, identified in Policy SP19).
- ◆ Provide a mobile monitoring station to identify any new areas of concern.
- ◆ Agree with NHC an annual review of air quality monitoring.
- ◆ Undertake to add new monitoring stations if and where air quality problems are identified in new locations (e.g. using the mobile monitoring station).
- ◆ Provide calibrated baseline air quality metrics for each air quality monitoring site.
- ◆ Provide detailed analysis of forecast impacts on air quality in Hitchin, including the two AQMAs.
- ◆ Agree with NHC and HCC a mitigation plan for any forecast or observed increase in air pollution in the Hitchin AQMAs.
- ◆ Work with DEFRA to establish a permanent site, monitoring particle number concentration and size distribution (including UFPs) in the vicinity of LLA; and to include UFPs in air quality modelling.
- ◆ Start monitoring levels and health impacts of UFPs before the airport expansion programme commences to provide a reliable baseline.

5 Noise and Vibration

- 5.1 The PEIR is designed to report on the preliminary conclusions of the Environmental Impact Assessment for the proposed development.
- 5.2 The current proposal is based on a planned expansion of airport capacity from 18mppa to 32mppa in 3 phases from 2025 to 2041, with full capacity of 32mppa reached in 2043.
- 5.3 Luton Airport will be subject to redesign of airspace, which will impact on future flight arrival patterns.
- 5.4 The Airspace Change Proposal (ACP) has been approved by the Civil Aviation Authority (CAA) in November 2021.
- 5.5 The Environmental Assessment of the ACP has considered combined impacts of the ACP and current Development Control Order proposals.
- 5.6 Noise modelling has shown the SAIP AD6 Proposal would result in decreases in population exposure to the daytime LOAEL of 51dB (LAeq 16h), and increases in the population exposed above the nighttime LOAEL of 45dB (LAeq 8h).
- 5.7 The overflight contours, which portray the pattern and dispersion of aircraft below 7,000 ft, show a reduction in the number of people overflown by less than 20 flights per day, an increase in the number of people overflown by 50 - 100 flights per day and a reduction in the number of people overflown by over 100 flights per day.
- 5.8 It is recognized that the ACP will change flight approaches, and therefore change the populations exposed. It is important that future changes to flight approach patterns are considered within future assessments and accounted for within baseline measurements.
- 5.9 The final details of the ACP for Luton cannot be known until neighbouring airports in the South East have also reevaluated their future airspace changes.
- 5.10 This leaves a significant degree of uncertainty in relation to future flight patterns and noise impacts. The CAA do not agree with the PEIR statement in para 16.1.4 that assumes the ACP will only result in noise benefits and suggest there could be some negative impacts.
- 5.11 This raises further questions in relation to the robustness of the current noise modelling carried out in support of the PEIR, unless modelling can be based on the outcome of decisions yet to be made for ACP proposals in the SE region.
- 5.12 The current Noise Control Scheme for Luton Airport has been recently revised following an application to vary condition 10 (Noise Contours) to Planning Permission 15/00950/VARCON in November 2021. (Subject to approval by the Local Planning Authority)
- 5.13 The amendment to Condition 10 has extended the areas allowed within the approved noise contours for both daytime and nighttime noise, thus relaxing the current condition within the Noise Action Plan.
- 5.14 The Noise Action Plan contour population results are published for 2006-2016, the next results due for 2021. These results all show increases in the number of dwellings and population exposed at noise levels for Lden, Lday, Leve, LAeq 16h, Lnight., and show that the airport exceeds the current noise contour limits.

- 5.15 Comments have already been made in relation to the incomplete baseline noise surveys, used as a basis for establishing a baseline for predicting future noise contours. The current planning condition 10, relating to the day and night-time contour limits (in terms of LAeq,16hour and LAeq,8hour, respectively) was exceeded for both day and night in 2019. The night-time noise contour limit was also exceeded in 2017 and 2018.
- 5.16 Noise contour plots will be used for future assessment of annoyance to health detriment and claims to Local Authorities for payments in relation to noise insulation. Therefore, the establishment of comprehensive baseline data is vital to the reliability of future contour modelling. As contour limits were exceeded in 2019, there is a question whether 2019 can be used as an acceptable baseline year.
- 5.17 The Lowest Observable Effect Level (LOAEL) of 51dBALeq, 16h, and 45 dBALeq, 8h, are key metrics within the Action Plan and hence referenced by modelled noise contours.
- 5.18 The noise contours for future assessments within the PEIR documents start at 51dB for daytime assessments, and 45dB for nighttime assessments, and are based on 3dB intervals.
- 5.19 Details from WebTAG suggest that where greater precision is required noise contours at 1dB intervals should be considered.
- 5.20 The TAG noise workbook (DfT 2017) quotes, “For each one decibel change in average noise level, a monetary value is assigned for the change in the following health impacts: amenity (annoyance), acute myocardial infarction, dementia, stroke, and sleep disturbance. These values are based on the latest evidence from the World Health Organisation.”
- 5.21 The following text (21-27) is copied from Transport for London paper, *Monetisation of aviation noise impacts* (May 2016).
- 5.22 The World Health Organisation (WHO) in the 2011 report, “Burden of disease from environmental noise” concluded that:
- “There is sufficient evidence from large-scale epidemiological studies linking the population’s exposure to environmental noise with adverse health effects. Therefore, environmental noise should be considered not only as a cause of nuisance but also a concern for public health and environmental health.”*
- 5.23 The WHO identifies health impacts including: cardiovascular disease, cognitive impairment, sleep disturbance and tinnitus as well as annoyance; further explanation of these health impacts is provided in the appendices.
- 5.24 Following the WHO report, the UK Department for Environment, Food and Rural Affairs (DEFRA) produced guidance in 2013 on assessing impacts of transport-related noise using a monetary approach covering a range of impacts on; annoyance, sleep disturbance and health impacts including acute myocardial infarction (AMI) – i.e. heart-attack – hypertension – i.e. high blood pressure – stroke and dementia.
- 5.25 In December 2015 the Department for Transport (DfT) published *Transport Analysis Guidance (TAG) on the analysis of environmental impacts in transport appraisals* as an update to the same document from 2014.
- 5.26 The significant change in the updated TAG noise impact appraisal is the inclusion of DEFRA’s guidance on the valuation of transport-related noise.

- 5.27 This approach to monetizing health impacts has been sanctioned by DEFRA where dose response functions have been created for these specific health impacts.
- 5.28 For instance, DEFRA 2014 report (Environmental Noise: Valuing impacts on: sleep disturbance, annoyance, hypertension, productivity and quiet) quotes the following (24).
- 5.29 The DEFRA report recommends, (i) It is recommended that the impacts of environmental noise on sleep disturbance are monetised and reflected in appraisal where it is proportionate to do so. (ii) The use of Disability-Adjusted Life Years (DALYs) to reflect the value of impacts on public annoyance from environmental noise. (iii) Where a decision is expected to alter the level of environmental noise, the impacts on hypertension—and consequently on dementia and stroke—should be considered and where proportionate quantified and valued.
- 5.30 The impacts of environmental noise on sleep disturbance are also already being considered for inclusion in some decision making. For example, in January 2013 the consultation on the night flying restrictions at Heathrow, Gatwick and Stansted proposed an appraisal approach which included the monetised impact of sleep disturbance. This consultation was informed by a Civil Aviation Authority (CAA) review to investigate the adverse effects of night-time aviation noise.
- 5.31 In relation to use of noise contours, the TAG workbook further states, “The TAG noise workbook input matrix gives the option to users to make inputs in either 1dB or 3dB intervals. Our preference is for the 1dB option to be used wherever possible in the context of assessing the impacts of airspace changes as it produces a more accurate calculation of the monetised value of the impact. This is because the monetary values provided by DEFRA and used in the TAG workbook are for 1dB changes in the level of noise. When inputs are made at 3dB intervals, the implicit assumption made is that all inputs are in the middle of the 3dB band and any change in bands represents a 3dB change”.
- 5.32 Thus there is a strong argument that the PEIR noise assessment should do more than consider annoyance from noise exposures, but conduct the assessment to quantify monetary values for the costs to health.
- 5.33 TAG now evaluates noise impacts as health impacts rather than purely as annoyance.
- 5.34 In the latest guidance they are now derived from estimates of noise impact on individuals’ health, sleep disturbance and annoyance. Monetised outputs are generated for sleep disturbance, Amenity, AMI, Stroke, and Dementia. Non-monetised outputs are based on total number of households with increased or decreased daytime or nighttime noise.
- 5.35 The Independent Commission on Civil Aviation Noise have recommended that additional noise metrics, such as N70, N65 and N60 are used in conjunction with LAeq measurements, which can also be used in conjunction with parameters as Noise Violation Limits NVLs, used within the noise control scheme.
- 5.36 These N values are the number of aircraft events overflights (CAA, 2017) at a location in each time period where the maximum sound level of the event is at least 70 dB(A), 65 dB(A) and 60 dB(A) respectively.
- 5.37 Overall, there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EIA, so that there is a consistency of approach for considering metrics that are used within Planning Permissions, Noise Control Scheme, Noise Action Plans, and Compensation Policies and measures.

- 5.38 It is of concern the baseline noise measurements have not all been conducted within recommended periods.
- 5.39 Overall, in terms of noise assessment there is a heavy reliance on the results of noise contour modelling, which currently use 2019 year as a baseline where contour limits were exceeded, this must be addressed.

5.40 Recommendations

5.40.1 NHC asks LR to:

- ◆ Provide detail of the metrics used within the PEIR and Environmental Statement, so that there is a consistency of approach with Planning Permissions, Noise Control Schemes, Noise Action Plans, and Compensation Policies and measures.
- ◆ Undertake to take all baseline noise measurements for the EIA within recommended periods.
- ◆ Confirm that the baseline used for contour modelling makes allowance for any exceedance of contour limits.
- ◆ Consider adding baseline noise monitoring sites to represent potential sensitive sites, such as schools, care homes, hospitals etc., including in areas that may be negatively affected by changes in future flight paths.
- ◆ Continue to monitor noise levels in the future in order to validate (or adjust and re-calibrate) noise contour models and monitoring sites.

6 Landscape and Visual Effects (these include comments by HCC Landscape Team supported by NHC)

6.1 Development structures

- 6.1.1 The consultation material confirms that the proposals would 'introduce built form that may be prominent in views from several locations,' and goes on to say 'new buildings will be similar in scale and character to the existing airport buildings. Subtle architectural surface finishes will be used to minimise visual impacts.'
- 6.1.2 There is concern for the intervisibility between the proposed development and the Hertfordshire Area, particularly North Hertfordshire.
- 6.1.3 It is proposed to locate a fuel line and connection facility of approximately 460 m² with an associated single hardcore access track for maintenance purposes near the point of connection, and an infiltration basin, within the North Hertfordshire boundary that is designated Green Belt. In addition, it is proposed to locate a fuel storage tank along adjacent to the County boundary in a relatively sensitive rural edge location.

6.2 Strategic Landscape Masterplan

- 6.2.1 It is advised that a Strategic Landscape Masterplan (SLMP) is required to, include a landscape masterplan, and set out the vision, key landscape features, qualities and characteristics that inform the development of a cohesive, beautiful, multifunctional, and resilient place for people and wildlife. This should be produced in collaboration with all key stakeholders. The proposals to date focus on the delivery of mitigation, however, there also needs to be a focus on placemaking and stewardship to ensure that the open space associated with Wigmore Valley Park is successful and ultimately delivers quality over quantity.

- 6.2.2 This approach is in line with the more detailed design and specifications for the replacement open space that was shared with the Landscape Stakeholders Group in 2020 and included the evolution of the replacement open space layout and design to reflect local parkland character within North Hertfordshire, alongside strategies for mitigation and enhancement, access and circulation, animal management, security, furniture, art, and hard and soft landscape. This information should be compiled within the SLMP and should serve to establish the vision and key design principles for the open space and landscape to ensure that the development proposals, and any future incremental change, are fully coordinated and continue to make a positive contribution to the area as a whole.
- 6.2.3 It is understood that Luton Rising have already secured planning permission to provide enhanced facilities, including an improved skate park and play facilities, an improved Wigmore Pavilion, and better surfaced footpaths. These early interventions are welcomed, however there needs to be consideration for how these proposals knit with the layout and design of the wider strategic landscape masterplan area.

6.3 Advanced Planting

- 6.3.1 It is understood from the submitted phasing plans that it is proposed to deliver the majority of the replacement open space and landscape mitigation at Phase 1, with the exception of the land parcels that accommodate the fuel line and connection facility and the infiltration basin that will be delivered in later phases. However, it is also stated within the consultation material that there will be advanced planting and that some early seeding has already taken place – however the location of this is not confirmed.
- 6.3.2 As discussed above, any early interventions need to be coordinated as part of an overarching strategic landscape masterplan. There does not appear to be any reference to advanced planting within the LVIA.

6.4 Stewardship and Draft Landscape & Biodiversity Management Plan

- 6.4.1 The proposals refer to 'Engaging with local stakeholders on the potential for future community stewardship of a new park, overseen by a new Community Trust.'
- 6.4.2 Of particular concern to North Hertfordshire is the long-term stewardship of the replacement open space which falls within the North Herts boundary and the lack of certainty over future management and funding of future management beyond 50 years as specified in the Draft Landscape and Biodiversity Management Plan. There is a need for further clarity over the scale and duration of mitigation schemes and aftercare.
- 6.4.3 Decisions could have a fundamental impact upon the strategic landscape masterplan and management strategies. LR need to be able to demonstrate that safeguards are in place to ensure the successful future management of the extended park delivers on the mitigation it is designed to address (including recreational impact and biodiversity enhancement).
- 6.4.4 For example, the Landscape and Biodiversity Management Plan suggests management will be implemented by a Landscape and Maintenance contractor. This will need to demonstrate that appropriate management will be delivered – such as extensive grazing for the ecologically enhanced grasslands to the east within North Hertfordshire.
- 6.4.5 It is understood that the responsibility for delivering and maintaining areas will depend on individual land considerations. The SLMP should sit alongside the BMP and would assist in providing individuals an understanding of how their areas contribute to the area as a whole.

- 6.4.6 The Draft Landscape and Biodiversity Management Plan (LBMP) will continue throughout a period of fifty years. As stated above, there is concern that any benefits accrued by the end of this period should not be lost.

6.5 Recommendations

6.5.1 HCC and NHC asks LR to:

- ◆ Provide (or signpost) plans and cross-sections that clearly show the relative heights of the existing and proposed built development and features, and details with regards to the approach to visually recessive architectural detailing and materials.
- ◆ Meet with HCC and NHC to discuss the LVIA in more detail.
- ◆ Provide further information with regards to the options and parameters informing the location, appearance and detailed design of the fuel line and storage tank. This should address any direct impacts, including visual amenity, on the Green Belt as part of any landscape and visual mitigation strategy.
- ◆ Meet with HCC and NHC at the earliest opportunity to discuss the replacement open space, its functionality in respect of public amenity and potential impacts on its ecological potential and the wider landscape elements.
- ◆ Provide more clarity on the future management and funding of future management on the replacement open space, particularly within North Hertfordshire.
- ◆ Provide more detail on how the proposed structures on Wigmore Valley Park fit with the SLMP.
- ◆ Engage with HCC and NHC on specifying the Landscape and Maintenance contract.
- ◆ Set a 'trigger point' before the end of the LBMP period when arrangements will be agreed with HCC and NHC for the provision of ongoing management and maintenance.

7 Biodiversity Net Gain

- 7.1 There is limited reference to Biodiversity Net Gain in the documentation. This will soon be planning law, which will apply to this development.
- 7.2 A minimum of 10% net gain will be required; there is no reference to any further ambition to exceed this.
- 7.3 The proper accounting for existing site value and future compensation and enhancement will require sufficient supporting evidence.

7.4 Recommendations

7.4.1 NHC asks LR to:

- ◆ Undertake to deliver more than 10% biodiversity net gain, and provide sufficient supporting evidence for how this will be achieved.

8 Draft Employment and Training Strategy

- 8.1 The ETS looks to address inequalities and lack of opportunity within deprived communities and minorities. Although the study area covers Hitchin, Letchworth and Stevenage, most of the detailed study has been confined to Luton and it appears to be 'averaged out' by considering Hertfordshire as a whole as a comparator rather than reflecting the patchwork nature of deprivation within each district in the areas relatively close to the Airport.

- 8.2 The ETS could do more to ensure a positive and pro-active approach in providing training opportunities such that the airport operator and other airport employers providing direct training opportunities rather than simply relying on existing institutions.
- 8.3 Greater consideration could also be given to pump-priming and subsidising sustainable travel to the airport in order to widen the geographic area in which people can travel to work sustainably and affordably.
- 8.4 Supporting sustainable travel options and reducing dependency on car ownership is an essential policy component of 'levelling up', as well as responding to the climate emergency.
- 8.5 Recent and expected increases in fuel and energy prices will push more people into poverty, exacerbating social divisions and reducing people's ability to access work.

8.6 Recommendations

- 8.6.1 NHC asks LR to:
- ◆ Use travel time, not distance, to determine accessibility of jobs.
 - ◆ Identify the most deprived communities within each district/borough.
 - ◆ Provide detail on how those communities in particular will benefit from new employment opportunities created by the airport expansion.
 - ◆ See also recommendations in §11 to §20 on Surface Access.

9 Community First Fund

- 9.1 Up to £13million/year will be made available to registered charities, community groups, and parish and town councils in areas affected by the airport's activities, including North Hertfordshire.
- 9.2 The fund will finance local decarbonisation projects, with a focus on areas of high deprivation.
- 9.3 The fund is intended to compensate for, not mitigate, the impacts of the airport.
- 9.4 The fund parameters appear to rule out investment in low-carbon transport, even though this could be highly beneficial, environmentally and socially, to rural communities and towns, including Luton and Hitchin. This is on two counts: firstly, transport infrastructure and services need to be planned and delivered at a higher level of organisation than individual communities; and, secondly, that transport infrastructure and services fall under the umbrella of mitigations, rather than compensation.

9.5 Recommendations

- 9.5.1 NHC asks LR to:
- Engage with LAs, parish councils and community groups, perhaps using workshops, to gather and test ideas for how this fund should be used (i.e. what schemes should qualify) and disbursed (i.e. how applications will be assessed and monitored).
 - Consider broadening the parameters of the fund to permit investment in sustainable transport, potentially including to:
 - ◆ Support bus services
 - ◆ Maintain active travel infrastructure
 - ◆ Integrate information and ticketing systems (which carries a cost overhead)
 - ◆ Market sustainable travel options

- ◆ Offer personalised travel planning
- ◆ Provide Bikeability and similar training

Surface Access

10 Transport policy context

- 10.1 Local and national policy and guidance prioritise reducing travel demand and mode-shifting trips from solo-occupancy driving to active travel, public and shared transport.
- 10.2 Two key policies from LTP4 are Policy 1 (Transport User Hierarchy) and Policy 4 (Demand Management):

Policy 1: Transport User Hierarchy

To support the creation of built environments that encourage greater and safer use of sustainable transport modes, the county council will in the design of any scheme and development of any transport strategy consider in the following order:

- Opportunities to reduce travel demand and the need to travel
- Vulnerable road user needs (such as pedestrians and cyclists)
- Passenger transport user needs
- Powered two wheeler (mopeds and motorbikes) user needs
- Other motor vehicle user needs

Policy 4: Demand Management

The county council considers greater traffic demand management to be essential in the county's urban areas in the next five years to achieve modal shift and improve sustainable travel provision. This can only currently be achieved efficiently and effectively through parking restrictions and charging applied to on-street, off-street and potentially at workplace parking. The county council will work with the district and borough councils and other key stakeholders to develop locally appropriate strategies.

- 10.3 The NHTS §5.14 sets out the following principles (most relevant points emphasised):
- Ensuring that the new developments have sustainable transport 'built-in';
 - Adoption of a transport user hierarchy;
 - Deliver a step change in cycling and improved walking within the main urban centres through travel behaviour change and better facilities;
 - Deliver an improvement in bus-based public transport in the main urban centres, including better bus interchange and journey times;
 - A 'Sustainable Spine' corridor along the A505 with a focus on enhanced public transport and cycling connectivity between the towns.
 - A **traffic management plan** for each main urban town, which focuses on managing traffic to improve air quality, reduce congestion and severance issues, **rather than increasing traffic volumes through the towns**.
 - Rural management and improvement measures aimed at resolving particular traffic issues or **taking opportunities to better link villages** to each other or the main urban towns, and;
 - Review, provide for and utilise technology improvements through the strategy.
- 10.3.1 In relation to the 'Sustainable Spine' corridor along the A505, NHTS §5.25 states (most relevant points emphasised):

- The corridor should be reconsidered in relation to its ‘people movement’ function, rather than as a highway link only.... This will mean considering:
- **More and better crossing points** for walking/cycling to key destinations;
- Technology to provide traveller information;
- Bus passenger infrastructure and bus priority;
- Enhanced bus services, with a frequency of a minimum of 4 buses per hour during the daytime Weekday and Saturday on the corridor;
- Consideration of how rail travel between the towns could be improved, perhaps with cheaper/more integrated ticketing;
- Cycling links on the corridor; and
- Speed of traffic and road space allocation.

10.4 *Gear Change: A bold vision for cycling and walking*⁴ sets a target (also referred to in *Decarbonising Transport: a Better, Greener Britain*) for “half of all journeys in towns and cities [to be] cycled or walked.”

In particular, there are many shorter journeys that could be shifted from cars, to walking, or cycling.

We want to see a future where half of all journeys in towns and cities are cycled or walked. 58% of car journeys in 2018 were under 5 miles¹⁶. And in urban areas, more than 40% of journeys were under 2 miles in 2017–18¹⁷. For many people, these journeys are perfectly suited to cycling and walking.

- 10.5 *Manual for Streets 1 & 2*, LTN1/20 and TSM (in particular chapter 6) set out practical guidance on design for cycling and walking.
- 10.6 Although road capacity is normally reported in terms of vehicles-per-hour, the true capacity is measured in people-per-hour (and tonnes-per-hour for freight).
- 10.7 It is therefore possible to increase true road capacity by enabling and encouraging modal shift from driving to more space-efficient alternatives:
- Travelling at 30mph, a bus carrying 60 people replaces around 1.2km of car traffic (each car carrying, on average, 1.2 people, which is a typical peak-time occupancy rate).
 - If people walk or cycle short trips rather than driving, that releases road capacity for traffic making longer trips (which accounts for the vast majority of traffic to/from LLA).
- 10.8 Transport accounted for 27% of the UK’s domestic carbon emissions in 2019.
- 10.9 A number of studies, including the *Sixth Carbon Budget*⁵ by the Climate Change Committee, have concluded that reducing vehicle-miles is an essential part of the strategy to decarbonise road transport:

⁴ See page 11 of [Cycling and walking plan for England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/681111/cycling-and-walking-plan-for-england.pdf)

⁵ See page 97 of [The Sixth Carbon Budget: The UK’s path to Net Zero - Climate Change Committee \(theccc.org.uk\)](https://theccc.org.uk/wp-content/uploads/2021/06/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero-Climate-Change-Committee.pdf)

The Balanced Pathway covers low-cost, low-regret options as well as more challenging and/or more expensive measures needed to meet Net Zero (Table 3.1.a). The key elements of this are:

- **Reduction in car travel.** Our demand scenarios are based on modelling by the UK Centre for Research into Energy Demand Solutions (CREDS), along with other literature and evidence across UK cities and in other countries. Compared to baseline growth, we assume that approximately 9% of car miles can be reduced (e.g. through increased home-working) or shifted to lower-carbon modes (such as walking, cycling and public transport) by 2035, increasing to 17% by 2050. The opportunities presented to lock-in positive behaviours seen during the COVID-19 pandemic and societal and technological changes to reduce demand (e.g. shared mobility and focus on broadband rather than road-building) are key enablers.

10.10 The emerging NHC Local Plan contains the following commentary on policies relating to Hitchin:

13.143 Our transport modelling identifies that a number of junction improvement schemes will be required in Hitchin by 2031:

- A505 Cambridge Road / Willian Road / Woolgrove Road
- A505 Upper Tilehouse Street / B655 Pirton Road
- A505 & A602 Paynes Park
- A602 / B656 / Gosmore Road
- Cadwell Lane / Wilbury Way / Woolgrove Road

13.144 A number of these highway mitigation schemes are on the routes of the A505 and A602 as they pass through the town. It is notable from the transport work that the majority of these schemes would be required even if no further development was being proposed through this Plan.

13.145 All schemes in Hitchin will be required to make reasonable contributions towards the funding of these works and to walking and cycling schemes in Hitchin which aim to influence mode share and free up capacity for new development. In some cases, existing traffic or background growth may result in junction capacity issues, and new development will further increase these problems. However any additional capacity developed to resolve existing or background growth issues will also be taken up by new development, and appropriate contributions are therefore likely to be required.

13.146 Any highway mitigation scheme at the A602 / B656 / Gosmore Road roundabout will need to consider the effects upon the Air Quality Management Area which has been declared on the approach to this junction.

11 A505/A602

11.1 PEIR2 chapter 18 acknowledges the status of the A505 and A602 described in LTP4:

... [LTP4] notes that the primary connections within this strategic movement corridor are the A505 and A602. These routes provide the strategic link between Luton, the airport, the A1(M) and Stevenage, as well as serving the towns of

Hitchin, Letchworth and Baldock. In addition to these towns, the airport generates a significant amount of traffic on the corridor. Traffic flows are generally localised between the towns along the corridor. It is noted that there are a number of lower category parallel routes also serve the corridor with some traffic using these to avoid congestion at Luton or Hitchin.

- 11.2 Nevertheless, the PEIR and ETS contain no detail on the impacts of airport expansion on traffic on the A505, A602 and connected roads, in particular in Hitchin. Nor does it make reference to the emerging NHC Local Plan (see §10.1010.10) or Transport Strategy (see §10.3).
- 11.3 There is also no explanation or justification provided for the highway interventions proposed for Hitchin. Nor is there any discussion of the wider impacts of those interventions on active travel, buses, and displacing congestion to other junctions in Hitchin. See also §**Error! Reference source not found.**

11.4 Recommendations

11.4.1 NHC asks LR to:

- ◆ Share with NHC detailed forecasts of traffic flows in the Do Nothing and Do Something scenarios at each junction of the A505 east of Luton to A1 Junction 9, and of the A602 to A1 Junction 8.
- ◆ Meet with NHC and HCC to discuss the modelling and rationale for proposed interventions in Hitchin.

12 Highway interventions in Hitchin

- 12.1 ETS Table 6-1 describes the following measure to mitigate the expected increase in traffic generated by the expansion of LLA:
- Highway improvements to make the network perform better for longer.
- 12.2 ETS Table 8-1 lists interventions for three junctions in Hitchin (on the A505 and A602), for which detailed drawings are included in ETS Appendix D:
- **Work no. 6o**, A602 Park Way / A505 Upper Tilehouse Street: Minor widening is proposed to the roundabout entries, to provide increased lengths of two lane entry. The widening on Park Way will be contained within an existing grass verge / landscape area, with the proposed realignment of Upper Tilehouse Street potentially requiring amendments to an existing retaining structure and vehicle restraint system.
 - **Work no. 6p**, A505 Moormead Hill / B655 Pirton Rd / Upper Tilehouse Street: Minor widening and realignment of Upper Tilehouse Street entry is proposed, to provide an increased length of two lane entry to the existing mini-roundabout. All of the Work would be contained within the existing highway boundary.
 - **Work no. 6q**, A602 Park Way / Stevenage Road: Minor widening of carriageway and realignment of various kerblines is proposed on A505 Park Way, Hitchin Hill and A602 Stevenage Road to provide increased lengths of two lane entry to the roundabout. These Work are restricted verge and landscaping areas, within the highway boundary.
- 12.3 These interventions are intended to be delivered in Phase 2a of the airport expansion plan, once airport patronage has reached 27 mppa. This is expected to be around the year 2039.

12.4 Hitchin Hill roundabout (see Figure 1)

- 12.4.1 There is currently no provision for cycling at this junction.
- 12.4.2 There is no footway along Park Way (A602) west of the junction.
- 12.4.3 There is no provision for people to cross Hitchin Hill (B656) or London Road (B656).
- 12.4.4 There is minimal provision (just dropped kerbs) for people to cross the eastern A602 arm of the junction.
- 12.4.5 Stevenage Road (A602) is in an Air Quality Management Area.⁶

12.5 A602–A505 roundabout (see Figure 2)

- 12.5.1 This junction is in the middle of a residential area, less than 250m from Market Place.
- 12.5.2 It is in a designated Air Quality Management Area.⁶
- 12.5.3 There is currently no provision for cycling at this junction.
- 12.5.4 There is a single pedestrian crossing of the gyratory to reach the town's public library.
- 12.5.5 There is no pavement on either side of Park Way.
- 12.5.6 There is no provision for walking across the Upper Tilehouse Street or Paynes Park arms of the junction.
- 12.5.7 The pedestrian crossing of Old Park Road is set back 32m from the junction.

12.6 A505–B655 mini roundabout (see Figure 3)

- 12.6.1 There is currently no provision for cycling at this junction.
- 12.6.2 There are no dropped kerbs on the southern side of Pirton Road nor the northern side of Offley Road.
- 12.6.3 There is minimal provision (just dropped kerbs) for walking across the other junction arms.

12.7 General objection

- 12.7.1 The PEIR and ETS provide no explanation nor justification for these highway interventions.
- 12.7.2 The proposed interventions:
 - ◆ Are in locations where provision for cycling is non-existent and provision for walking is minimal.
 - ◆ Take space away that could and, in probably all cases, should be allocated to walking and cycling.
 - ◆ Increase general traffic flows along the A505, which will likely increase congestion in the town centre, notably around the pinch point where the A505 passes under the East Coast Mainline.
 - ◆ Significantly increase the difficulty and danger for people walking and cycling to cross the junction arms that are being widened to accommodate additional filter lanes.
 - ◆ Increase traffic speeds on the roundabouts in question, which will increase the risk to life and injury in the event of a collision with a person walking or cycling.
- 12.7.3 These outcomes are inconsistent with LTP4 and NHTS, in particular the policies highlighted in §10.2, 10.3 and 10.3.1.
- 12.7.4 Any intervention in the urban road network should seek to improve compliance with Manual for Streets and LTN1/20. The proposed interventions would achieve the opposite.

⁶ Decision to review not expected before 2023 (see [2021 Air Quality Annual Status Report](#))

- 12.7.5 Furthermore, to achieve active travel targets in Hitchin, it will be necessary to *reduce* road capacity in the town in order to create space and signal time for active travel. That is incompatible with increasing vehicle traffic flows into the town centre.
- 12.7.6 In short, the proposed interventions are contrary to local and national policies and guidance.

12.8 Recommendations

12.8.1 NHC asks LR to propose interventions that will:

- ◆ Increase transport capacity in terms of people-per-hour (rather than vehicles-per-hour).
- ◆ Decrease carbon emissions associated with trips to/from LLA.
- ◆ Improve air quality in Hitchin (see §10.1010.10).

12.8.2 This may be achieved in three ways:

- ◆ Modal shift from car to bus for medium and longer distance travel, including to and from the airport;
- ◆ Modal shift from car to active travel for short trips within Hitchin, which will release road capacity for longer-distance traffic;
- ◆ Increased car occupancy rates.

12.8.3 Measures that could be considered are set out in §15.3, §16.6, §17.6 and §18.4.

13 Willow Lane

13.1 Willow Lane, on the southern edge of Hitchin, is a commonly used and, at peak times, highly congested shortcut between the A505 and A602 (see Figure 4). The status of this road was noted in the NHTS:⁷

Use of unsuitable roads by through traffic

3.44 As with most urban areas, there is some evidence that motorists are using unsuitable roads to avoid delays on congested routes. There are many locations where traffic volumes are probably unsuitable for the nature of the road, but the more 'strategic' routes noted in the modelling include:

- Routes through Great Wymondley, by which traffic can bypass delays on the A602 between Hitchin and Stevenage;
- The B197 through Graveley between Letchworth and Stevenage;
- Willow Lane in Hitchin, which can be used by east/west traffic to bypass delays on the A505/A602 route; and
- Stevenage Road, which can be used to bypass congestion on the A602 between Hitchin and Stevenage.

13.2 Any increase in traffic between LLA and the A1 via the A505 and 602 will increase traffic on Willow Lane.

⁷ See ED14 in the [NHC Local Plan Examination Documents](#)

13.3 This could have safety implications on the A505 if the queue of traffic waiting to turn right into Willow Lane extends beyond the length of the filter lane. The speed limit at this point is 60mph. The back of the filter lane is only 130m beyond the end of the dual carriageway.

13.4 It is unclear if Willow Lane has been included in traffic modelling.

13.5 Recommendations

13.5.1 NHC asks LR to:

- ◆ Check that Willow Lane has been included in traffic modelling.
- ◆ Propose options for mitigation in case there are safety, air pollution or noise impacts from more traffic trying to use Willow Lane.

14 Traffic calming on diversionary routes

14.1 ETS Paragraph 8.7.4 states:

A series of areas have been identified for potential traffic calming measures, within the rural areas to the north east of the airport. These include Breachwood Green, Whitwell and Great Offley, amongst others. These measures would be provided to dissuade traffic from accessing the airport via existing rural roads, which may be unsuitable for increased volumes of traffic. These are shown within Appendix D – Highway Mitigation Proposals.

14.1.1 The areas of interest are marked (see Figure 5), but no detail is provided on what options will be offered or considered.

14.1.2 The justification for traffic calming measures in villages also applies to towns, where residential streets are liable to be used as rat-runs when main routes become congested.

14.1.3 Stevenage Road through Titmore Green is identified in the North Herts Transport Strategy (2017) as being used to bypass congestion on the A602.⁸

14.2 The SMFR states in §5.3.20 and §5.3.21:

5.3.20 Considering the forecast flow increases on rural routes to the east of Luton Airport, Figure 5.5 shows the forecast routeing of traffic to / from Luton Airport for the existing terminal and the proposed Terminal 2 (in 2039 and 2043). These show that traffic accessing the existing terminal from the east is forecast to use Vauxhall Way and the A505; however, traffic accessing the proposed Terminal 2 is forecast to use more minor routes to the south of the A505. Although this additional traffic is forecast to change some of the routing for the background traffic, via some of the Local roads to the east of Luton such as Lilley Bottom Road, Kings Walden Road and Darley Rd.

5.3.21 With the introduction of Phase 1 of the AAR, a link is provided between the proposed location of Terminal 2 and Eaton Green Road near the junction with Wigmore Lane. This additional access point to the east of Luton is forecast to make rural routes through Tea Green, King's Walden and Preston more attractive than routeing through eastern Luton to access the A505.

⁸ See 3.44 of [Transport Strategy \(north-herts.gov.uk\)](https://www.north-herts.gov.uk/transport-strategy)

- 14.2.1 NHC is concerned about these findings. They seem not to be reflected fully in the map identifying rural areas of concern, which identifies Tea Green but not King's Walden and Preston (see Figure 5 below).

14.3 Recommendations

14.3.1 NHC asks LR to:

- ◆ Include King's Walden, Preston and all other villages on forecast diversionary routes in scope for traffic calming measures.
- ◆ Provide a forecast for net changes to flows for both Terminals 1 and 2 combined, so that the full impact can be understood more easily.
- ◆ Provide absolute figures for current and forecast traffic levels through villages that will see a significant (> 5%) increase in traffic volumes (daily or peak) owing to LA expansion.
- ◆ Provide more detail about what "traffic calming measures" are being considered for the identified villages.
- ◆ Expand the geographical scope for identifying where traffic calming measures may be required, to include Hitchin and south-east of Hitchin.
- ◆ Outline how local residents, councillors (parish, district and county), schools and businesses will be proactively engaged (e.g. through workshops) to consider options, locations and designs.

15 Bus priority

- 15.1 The ETS makes no mention of bus priority as a means of increasing road capacity (in terms of people moved per hour).
- 15.2 The A505 Corridor Study has looked at infrastructure options to support BRT (in reality, that means express bus services) between Luton, Stevenage, Hitchin, Letchworth Garden City, Baldock, Royston. Options included new link roads (town centre bypasses) and junction capacity increases.
- 15.3 However, the study concludes that such interventions would be unlikely to guarantee significant advantage to bus services in the long term and would, counterproductively, induce demand to travel in private vehicles.

15.4 Recommendations

- 15.4.1 NHC asks LR to fund researching, modelling, consulting on, trialling and implementing any measures that are deemed effective and proportionate to restraining increased demand to travel by car to/from LLA.
- 15.4.2 Potential options to reduce congestion by reducing traffic volumes (in line with LTP4 Policy 4) include:
- reallocating lanes to bus-only use;
 - creating new bus lanes and bus gates;
 - employing smart traffic flow control;
 - designating some lanes as multi-occupancy vehicle lanes;
 - reducing road capacity where it could relieve downstream congestion;
 - building travel hubs;
 - increasing parking charges;
 - reducing parking availability;

- emission zone charging;
- congestion charging;
- targeted subsidies for public transport;
- grants or interest-free loans to help people purchase cycles (in particular, e-bikes, cargo-bikes and other relatively expensive models);
- personalised travel planning.

16 Public transport

16.1 The ETS includes a number of measures to support increased bus patronage, notably (from Table 6-1):

- Engaging with bus operators to create new and extended routes, better connecting the airport to more places in particular urban areas and transport hubs.
- Explore bus enhancements, including subsidies for east west routes to improve service provision and passenger experience.
- Work with operators to open up new connections and destinations.
- Work with operators to strengthen existing services.

16.2 Funding to pump-prime and support an expansion of bus services is critical to achieve the sustainable travel targets for LR, and provide benefit to residents in north-west Hertfordshire, who will be most negatively affected by the airport expansion.

16.3 Demand Responsive Transport (DRT)

16.3.1 The HertsLynx DRT has proven to be successful at gaining patronage where previously there was no or minimal scheduled service provision.

16.3.2 Note that demand for runs to/from the airport could be high because DRT would compete on price with taxis. As long as this complements, and does not undermine, the service to other destinations, this could, with effective marketing, be a revenue generator, offsetting some or all of the costs of supporting the service across the wider network.

16.4 Express bus services

16.4.1 The Arriva 100 bus service between Stevenage and Luton via Hitchin⁹ does not call at Hitchin railway station. The walk between the station and Queen St stops is just over 1km.

16.4.2 The journey time for the 100 service is unattractive, taking over an hour at peak times to travel from Stevenage bus station to LLA (and another ten minutes to reach the Luton Station Interchange).

16.4.3 Alternative routes and service patterns will be needed if bus services are to compete with driving, for airport workers and passengers.

16.5 Travel hubs

16.5.1 Critical to achieving an attractive public transport alternative to driving is integrating services to provide wide coverage and comparable journey times.

16.5.2 This cannot be achieved with traditional bus routes, which are designed to provide wide coverage at the expense of journey times.

16.5.3 Part of the solution is to design bus services around travel hubs (also referred to as 'mobility hubs'), where people can interchange between fast longer-distance services (rail or express

⁹ See [100 - Luton - Stevenage – Arriva Herts and Essex – bustimes.org](https://www.bustimes.org/route/100-luton-stevenage-arriva-herts-essex)

bus) and first/last mile connections (walking, cycling, local and demand-responsive bus services, taxis, kiss-and-ride and, where appropriate, park-and-ride).

16.6 Informal park-and-ride

- 16.6.1 There is a concern that the cost of access and parking at LLA will stimulate demand for informal park-and-ride, where a land owner provides parking and a private shuttle bus service. This happens now at Slip End, to the south of Luton. Other sites could pop up elsewhere, including in North Hertfordshire, around the A505.
- 16.6.2 Companies like JustPark broker rental of driveways and other private land close to railway stations and bus routes. This could grow to account for a significant number of trips to the airport.

16.7 Recommendations

- 16.7.1 NHC asks LR to propose and fund measures to mode-shift trips from car to bus for:
- ◆ Trips to/from LLA (the primary focus of the existing proposals)
 - ◆ Other trips in the Luton–Hitchin–Stevenage area, on the basis that mode-shifting those trips releases road capacity for new car trips that are more difficult to mode-shift.
- 16.7.2 With respect to DRT, NHC asks LR to fund:
- ◆ Demand modelling to forecast the required resources (vehicles, drivers, back-office, etc), capital investment and revenue support to expand the HertsLynx service zone west to Luton.
 - ◆ Capital costs of the expansion of HertsLynx.
 - ◆ Any required revenue support for the western expansion of HertsLynx for long enough to minimise the risk of a cliff-edge reduction in services when that funding ceases.
- 16.7.3 With respect to express bus services, NHC asks LR to fund:
- ◆ Traffic and route modelling to design new express bus service routes between Luton and Stevenage and Luton and Baldock, via Hitchin station and Letchworth. The latter service will cater to people travelling by train from the north and East Anglia, avoiding the delay of travelling to Stevenage to interchange, or walking 1km through central Hitchin.
 - ◆ Demand modelling to determine appropriate service frequencies and operating hours for express bus services.
 - ◆ The development of an Enhanced Partnership Agreement covering the new express bus services.
 - ◆ Pump-priming the new services for long enough to minimise the risk of a cliff-edge reduction in services when that funding ceases.
 - ◆ Long-term support for unprofitable service times (e.g. early morning and late night), perhaps drawing from the proposed airport road user charge (ETS §7).
- 16.7.4 With respect to travel hubs, NHC asks LR to fund:
- ◆ Research to identify suitable locations for travel hubs to facilitate access by public transport to LLA.
 - ◆ Scoping, survey, consultation and design work for travel hubs at any locations identified as suitable.
 - ◆ A contribution towards the delivery of any travel hubs adopted in local authority plans, in proportion to the number of public transport trips they will facilitate along the A505/A602 corridor.

16.7.5 With respect to informal park-and-rides, NHC asks LR to:

- ◆ Monitor and work with planning authorities to manage informal park-and-rides.
- ◆ Make an appropriate correction to the number of DART, bus and taxi passenger arrivals where the main travel mode was by private car.

17 Active Travel

17.1 The ETS includes a number of measures to support increased active travel, notably from Table 6-1):

- Contributions towards North Herts Walking and Cycling Infrastructure plan for schemes that improve access to the airport.

17.2 North Herts' LCWIP focuses on the towns and one inter-urban route, between Stevenage and Hitchin. Luton's LCWIP will necessarily end at the borough border. As a result, there is little in the way of evidence or policy to support investment in cycling and walking infrastructure in north-west Hertfordshire.

17.3 If there were safe and attractive cycling infrastructure available to residents of villages between Luton and Stevenage and Hitchin, it would remove some vehicles from the A505 and A602 that are making local trips. This would free up capacity for longer-distance trips, which are the vast majority of those to LLA.

17.4 If there were cycling highways between Luton and Hitchin, and between Luton and Stevenage, these would:

- Support a small volume of inter-urban cycle trips (the 8-mile distance is manageable on an e-bike).
- Enable residents of villages between Luton, Hitchin and Stevenage to cycle into their nearest town.
- Enable those residents to cycle between villages to access local amenities and make social visits.
- Enable residents of the towns to access the villages and countryside. This would bring money into rural pubs, tea rooms, B&Bs, farm shops, etc.

17.5 There would be a large net benefit to the rural area most affected by the airport expansion.

17.6 Recommendations

17.6.1 NHC asks LR to fund:

- ◆ Scoping, survey, consultation and design work to develop plans for two cycling highways, one between Luton and Hitchin, and one between Luton and Stevenage.
- ◆ A contribution towards delivery of any cycling highways adopted in local authority plans, in proportion to the number of trips they will remove from the A505 and A602.

18 Ride-sharing

18.1 Ride-sharing is the simplest and quickest way to reduce car traffic.

18.2 ETS §6.3.4 states:

The airport has also teamed with liftshare.com to encourage air passengers and employees to save money by sharing fuel and parking costs through car sharing.

18.3 Table 2-2 includes the following statement (our emphasis):

The airport has a few initiatives for employee travel, including liftshare.com accounts, public transport discounts and a Cycle to Work scheme. Recent survey results suggest that these initiatives could be better promoted to employees.

18.4 The London Luton Airport Carshare community was closed as of 14 March 2022, possibly because the subscription to Liftshare lapsed during the COVID pandemic.¹⁰

18.5 Recommendations

18.5.1 NHC asks LR to confirm how it will fund, incentivise, market and monitor lift-sharing programmes for airport staff and passengers long-term to maximise the take-up of ride-sharing.

19 Route monitoring

19.1 ETS Table 6-1 describes the following measure:

Monitor routes to airport to pick up unintended impacts on local communities.

19.2 Recommendations

19.2.1 NHC asks LR to:

- Agree with NHC and HCC the locations and types of all traffic and air quality monitoring equipment to be deployed in North Herts, including at relevant sites allocated in the emerging and future Local Plans, such as East of Luton (Policy SP19).
- Consider making available a mobile monitoring station to monitor sites of potential concern identified at a later date.
- Agree with NHC a process for reviewing the deployment of monitoring stations to ensure that all affected settlements, now and in the future, are adequately monitored.
- Provide calibrated baseline traffic counts for each traffic monitor, broken out by (at a minimum): car, LGV, MGV, HGV and motorcycle.
- Undertake to manage and maintain all deployed monitoring equipment until at least five years after LLA patronage first reaches 32 mppa, or whatever maximum is agreed as part of the DCO process.
- Re-establish a ride-sharing service, and promote it consistently and effectively to staff and passengers.
- See also recommendations in §4.10.

20 Interventions in Luton

20.1 A505 road schemes

20.1.1 Two major road schemes are proposed in Luton that relate to the A505, for which Strategic Outline Business Cases are being prepared:

- Vauxhall Way Improvements
- Century Park Access Road

¹⁰ See <https://liftshare.com/uk/community/londonluton>

- 20.1.2 The DfT wrote to all STBs, including EEH, on 18 January 2022, asking them to re-consider their bids for MRN/LLM funding in the current Spending Review period (to 2025). EEH confirmed on 18 February 2022 that the above two schemes remain a priority.
- 20.1.3 However, DfT indicated in its letter that it is reviewing all schemes in the current MRN/LLM programme that have not already received approval at the Outline Business Case stage (which neither of the above two schemes has). That means there is now some uncertainty about whether the above two schemes will receive central government funding before 2025.
- 20.1.4 This therefore challenges the statement in ETS §3.9.3, that this scheme is “committed”:
- When considering the transport impacts of the DCO application, the schemes listed above are considered to be committed schemes. In other words, they are assumed to be in place by 2027 whether the airport expansion proposals proceed or not.*
- 20.1.5 DfT indicated that a key factor in reassessing schemes is the increased priority to decarbonise road transport, reflected in the increased costs of carbon now used in Value for Money appraisal.
- 20.1.6 Increasing road capacity will, all else equal, accommodate and induce more road traffic, leading to an increase in carbon emissions.

20.2 Park-and-ride

- 20.2.1 The Strategically Important Roads Update report to the EEH Board on 24 September 2021 states, in relation to the Vauxhall Way Improvements:¹¹

The scheme will provide an important bus route link to a proposed park and ride/mobility hub and hence more sustainable transport options for the airport, business expansion and other allocated employment sites in the Local Plan, helping to avoid traffic using less suitable roads in the area.

- 20.2.2 Luton Local Plan policy 11.12 describes the park-and-ride facility thus:

The Local Plan will consider Park and Ride facilities at land south of Stockwood Park adjacent to Junction 10a and at Butterfield to intercept car journeys to employment locations in the East Luton Corridor area as well as to the town centre. Further sites around the periphery of the Luton/Dunstable/Houghton Regis conurbation, but outside the borough boundary, are being considered by adjoining local authorities. To maximise passenger transfer, significant investment will be made in bus priority measures for those corridors served by Park and Ride sites.

- 20.2.3 There appears to be no mention in ETS or PEIR2-18 of any park-and-rides or mobility hubs, at Butterfield Business Park or anywhere else. This appears to be a significant disconnect between the LR Transport Strategy and the Luton Local Plan.
- 20.2.4 In any case, the creation of a park-and-ride car park will not necessarily reduce carbon emissions. Analysis of existing and planned park-and-rides elsewhere shows that they increase carbon emissions, concentrate traffic on approach roads to the park-and-ride, and undermine local bus services by abstracting passengers to park-and-ride services.

¹¹ See page 7 of Agenda Item 6: Strategically Important Roads Update, 24 September 2021 (englandseconomicheartland.com)

20.3 Recommendations

20.3.1 NHC asks LR to:

- ◆ Acknowledge that there is now uncertainty about the delivery of the A505 road interventions in Luton.
- ◆ Acknowledge that increasing capacity on this part of the A505 is likely to induce more trips along the A505 to the east of Luton, potentially impacting traffic in Hitchin.
- ◆ Consider working with LBC to re-specify the Vauxhall Way Improvements schemes to create segregated routes for buses and active travel, rather than increasing road capacity for general traffic.
- ◆ Provide clarity on whether LR has considered park-and-ride to be part of the future transport solution for the airport.
- ◆ Model the demand for use of a park-and-ride at Butterfield Park (with whatever capacity LBC envisages) and impacts on traffic using the A505.

21 Figures

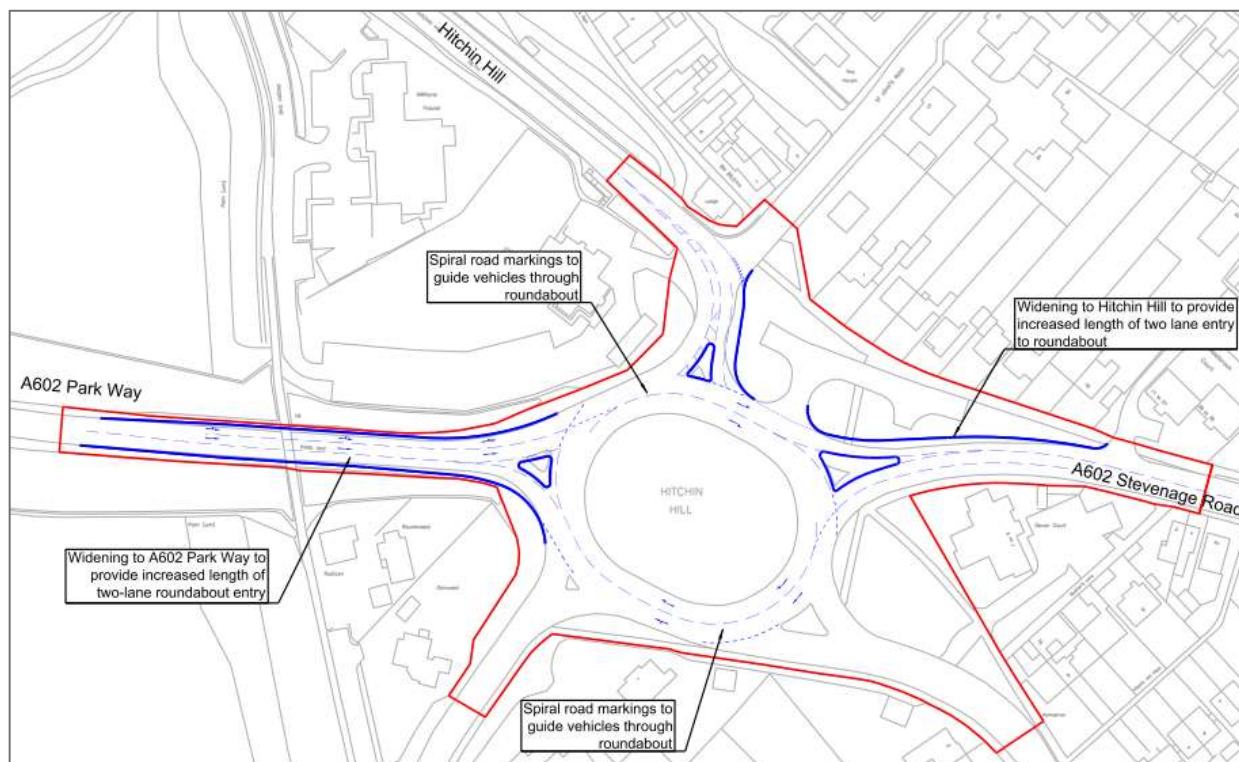


Figure 1: Hitchin Hill roundabout

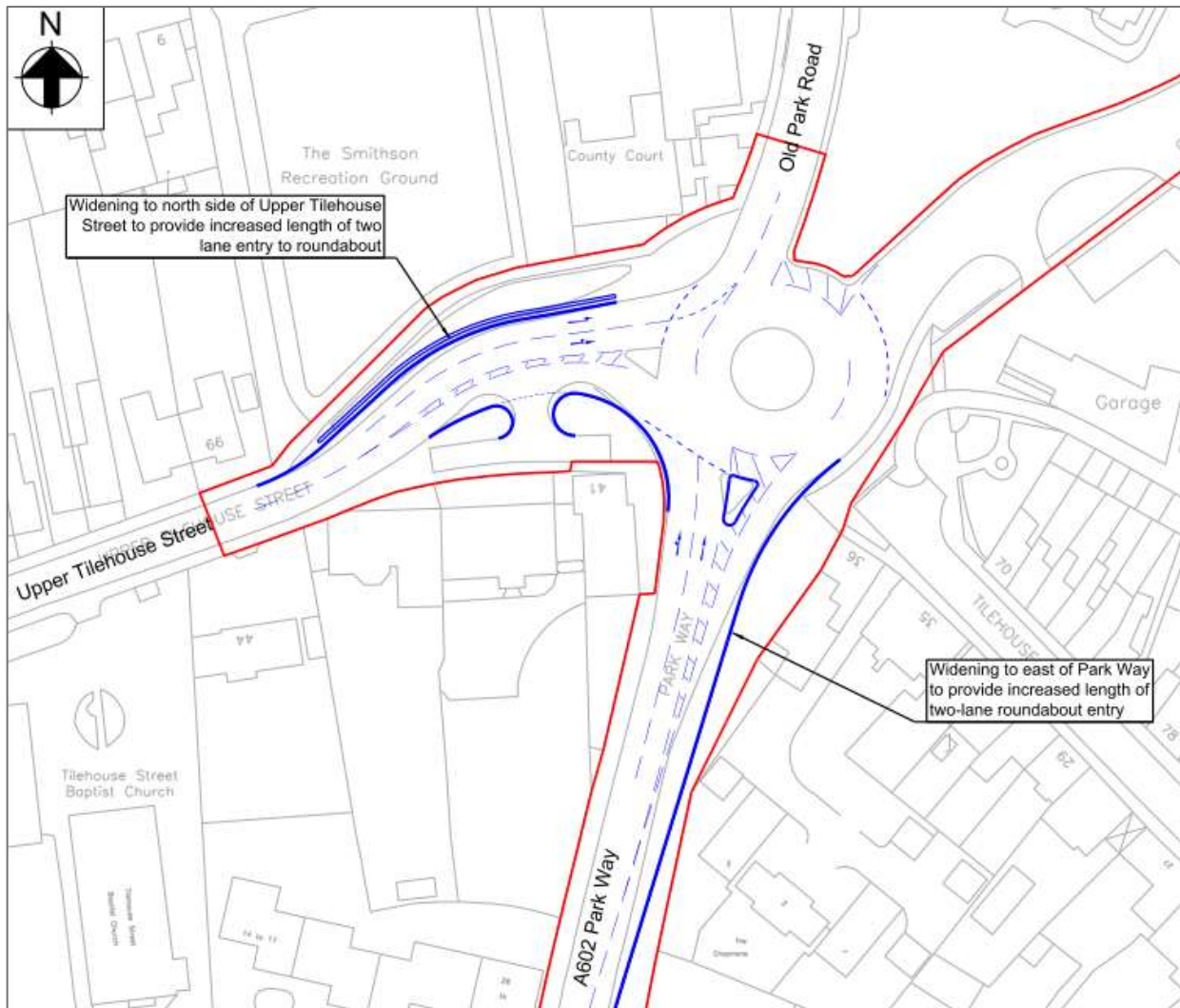


Figure 2: A602-A505 roundabout

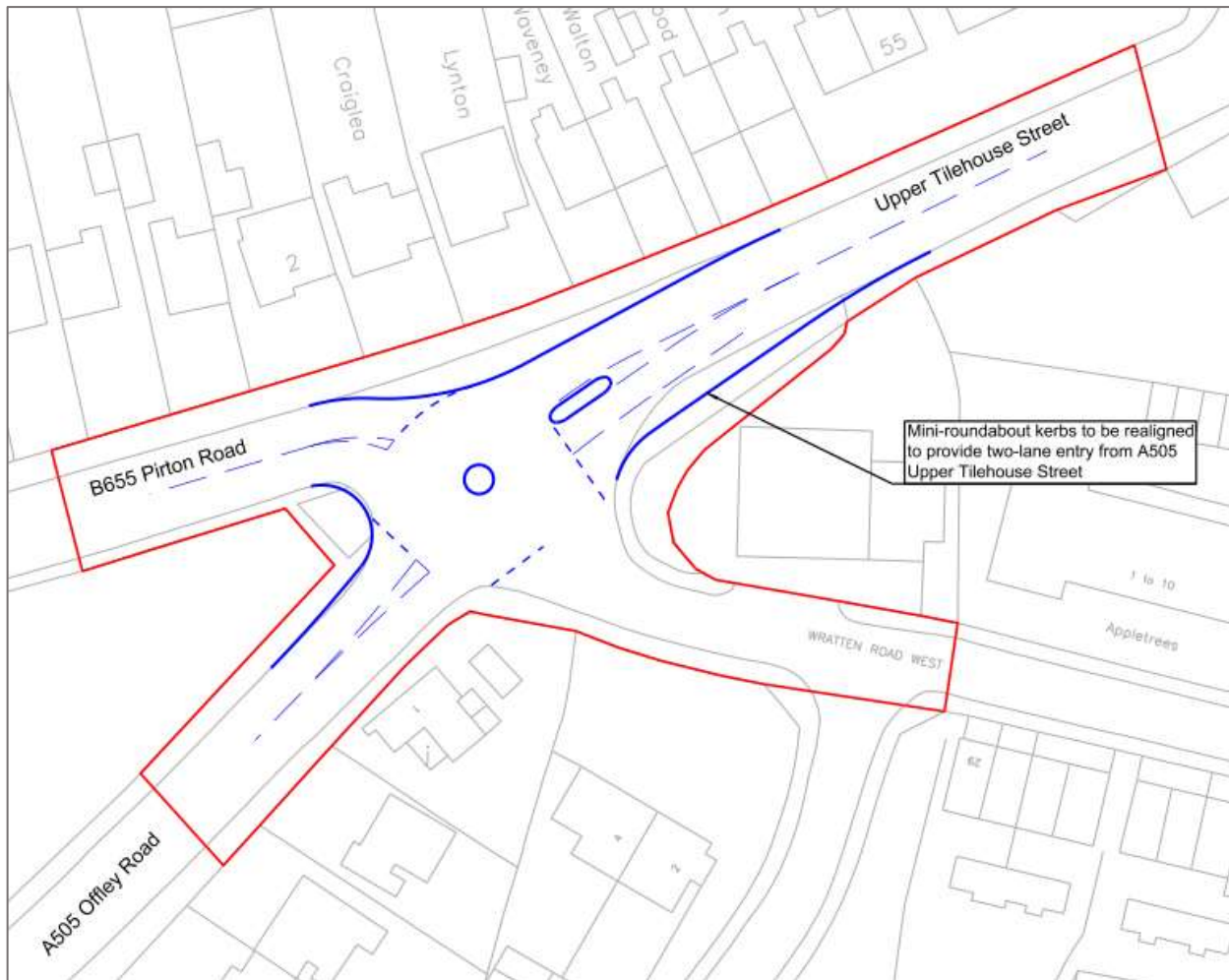


Figure 3: A505–B655 mini roundabout

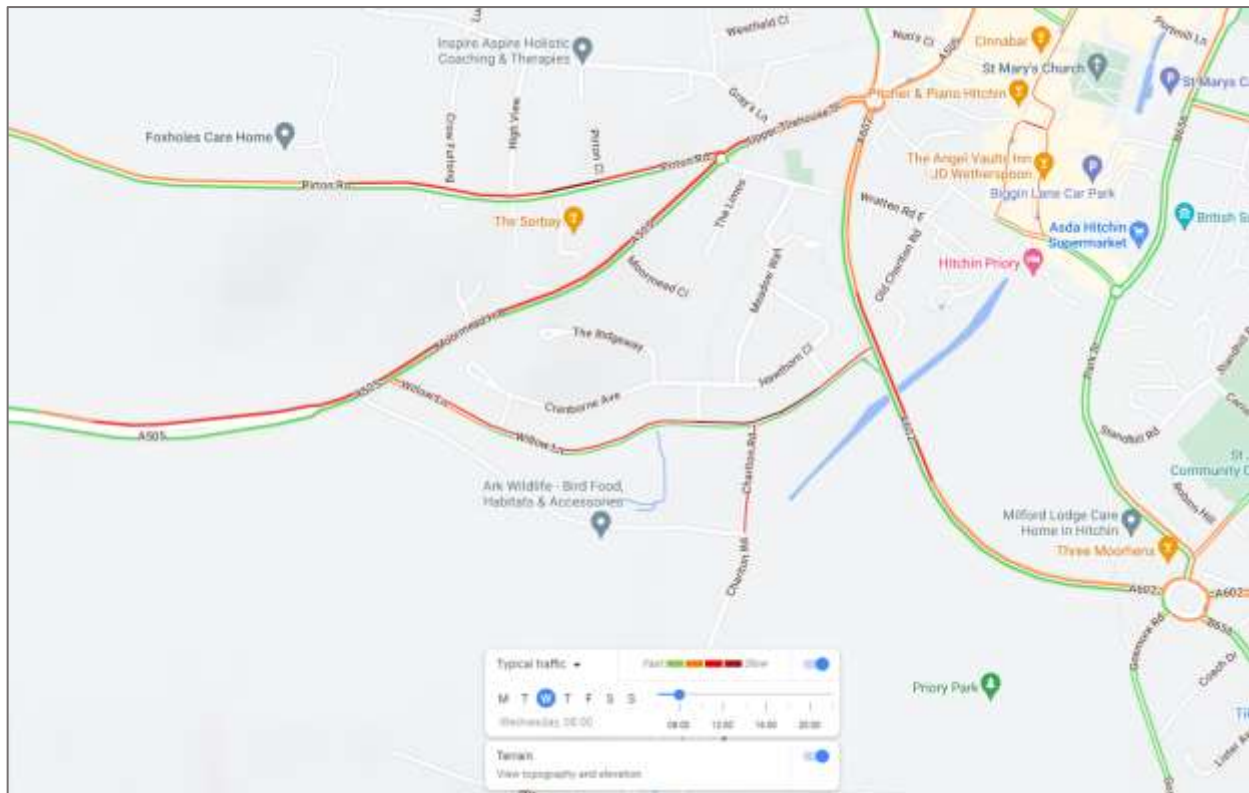


Figure 4: Typical traffic flows at 08:00am on Wednesdays – from Google Maps

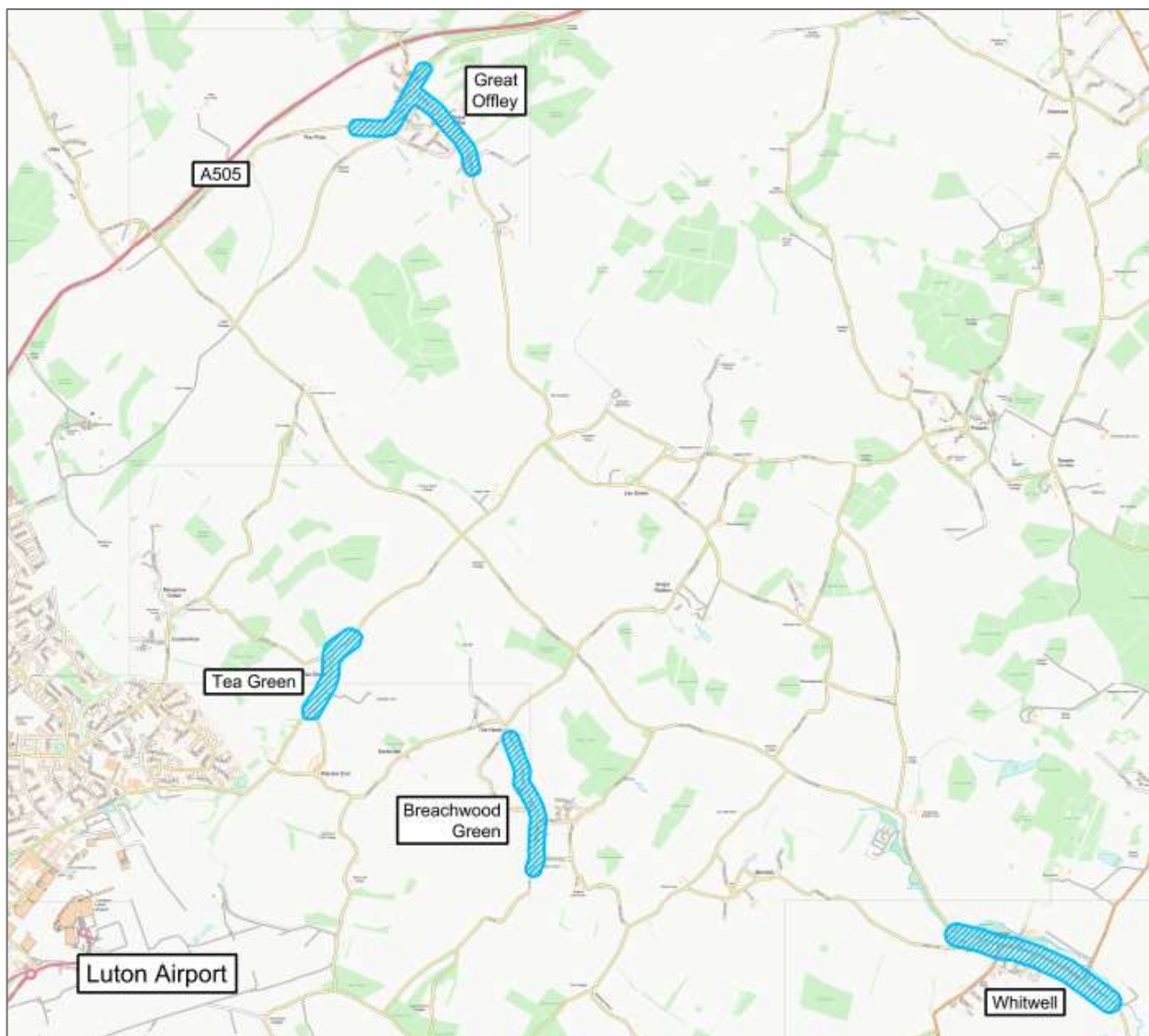


Figure 5: Areas identified in the ETS for traffic calming measures, from Appendix D