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18<sup>th</sup> February 2020

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## **LUTON AIRPORT EXPANSION – STATUTORY CONSULTATION**

England's Economic Heartland (EEH) Strategic Transport Forum is the Sub-national Transport Body for the Heartland region. Membership of the Forum covers the area from Swindon, through Oxfordshire, Milton Keynes and across to Cambridgeshire, and from Northamptonshire across to Luton and Hertfordshire.

As the Sub-national Transport Body, EEH is responsible for setting the strategic vision for the transport system, supported by a long term strategy for realising that vision.

The Heartland includes the Oxford – Cambridge Arc – a region identified by the Government as being an economic priority for the UK. In March 2019 the UK Government set out its strategic ambition for the region as being to realise its economic potential whilst achieving net environmental gain.

EEH provides leadership on connectivity issues for the Oxford – Cambridge Arc and works closely with the other work streams: productivity, place-making and the environment to ensure that matters relating to transport infrastructure are considered in the wider policy context.

The proposal to expand Luton Airport should be viewed through the lens of the strategic ambition for the region, as well as within the context of national targets, including those in relation to de-carbonisation of the transport system.

### *Outline Transport Strategy*

In July 2019 EEH published its Outline Transport Strategy. The Strategy is consistent with the overarching strategic ambition for the region. In so doing it sets out how realising that ambition will require an approach that is not 'business as usual'.

The Outline Transport Strategy acknowledges the reality that realising economic potential will require investment in transport infrastructure and services. However it also sets out how innovation, together with the introduction of new business models – consistent with the Government's Industrial Strategy – provide the opportunity to use economic growth as a catalyst for achieving net environmental benefit.



EEH is committed to developing the draft Transport Strategy for publication in summer 2020. This will set out the policies and proposals that will be required in order for the transport system to make its contribution to the overall strategic ambition for the region.

Given this evolving policy framework, EEH would particularly welcome the opportunity for an on-going dialogue with London Luton Airport Limited as the detail of its proposal is developed further.

### *Basis of our Response*

An initial (draft) response to the consultation was provided by the EEH Programme Director on 16<sup>th</sup> December 2019. It was made clear that the Strategic Transport Forum would not be able to consider its formal position until its meeting on 24<sup>th</sup> January 2020: due to the consultation period coinciding with the UK General Election. This response represents the formal view of the Strategic Transport Forum.

### *Response*

EEH recognises the economic significance of the United Kingdom's aviation network.

The ability to connect regions economically has enabled trade links to be established both domestically and internationally. Such linkages support economic activity across the region and beyond, and bring significant benefits to our businesses and residents.

Luton Airport's growth in recent years has benefited the local economy directly in terms of employment opportunities and the funding generated for investment in locally provided services.

The proposed expansion of the airport will create opportunities to build on those foundations and thereby generate further benefits for the local economy and residents. In addition, increased capacity at Luton Airport will offer additional opportunities for residents and businesses in the region to use their local airport, thereby providing relief to other parts of the wider South East airport system.

However, the implications of the proposed expansion, including its environmental implications need to be carefully considered and appropriate measures put in place to ensure that the proposal is consistent with the wider strategic ambition for the region.

Overall, EEH is supportive of the principle of expanding Luton Airport, but that support is conditional upon London Luton Airport Limited being able to demonstrate that the package of supporting measures is sufficiently robust and deliverable, as well as being consistent with the policy framework of the draft Transport Strategy.

### *Surface Access Requirements*

The promoter must be able to demonstrate that the proposed surface access strategy is underpinned by the following principles:

- Investment in the delivery of measures that improve local connectivity between the airport and the immediate surrounding area – those measures to be supported by proposals that actively engage airport employees (both existing and future) and encourage them to use active travel modes
- Investment in the delivery of public transport infrastructure and services so as to provide an enhanced travel option for those accessing the airport.



Whilst the provision of public transport infrastructure and services largely rests in the hands of third parties, the promoter needs to work actively with those third parties to develop proposals that ensure that the share of public transport is increased so as to achieve the targeted modal split. In particular the promoter should identify the levels of service/capacity required to support the proposal. It should then work with the infrastructure and service providers to develop the business case for the required level of investment to be delivered through the appropriate delivery mechanisms.

- Any proposal to increase on-site car parking should only be considered once opportunities to improve local connectivity and public transport infrastructure and services have been fully exploited.
- Where there is a need for investment in improved highway infrastructure this should prioritise improvements that support local connectivity and public transport infrastructure and services.

Based on the evidence to date EEH is not convinced that the proposed surface access arrangements are consistent with these principles.

We do not consider the proposal as currently set out demonstrates that the package of supporting measures is sufficiently robust and deliverable, nor that they will be consistent with the policy framework of the EEH Transport Strategy.

Specific areas of opportunity that EEH considers need further exploration include:

- Midland Main Line – the promoter should discuss with the East Midlands Railway franchisee the level of service required to enable Luton Airport Parkway station to serve as a gateway to the airport: the significance of rail will increase further as a result of the proposed expansion and this must be reflected in the level of service provided. The scheme promoter should therefore identify what changes might be required to the frequency of services calling at Luton Airport Parkway and the destinations served, in order to increase further the rail share.

In this context the promoter should assume that East West Rail will be operational, and in particular identify what additional services might be required in order to offer additional travel opportunities through effective interchange between Midland Main Line services and East West Rail. Where additional services are required to support the proposed expansion of the airport the scheme promoter should identify how they will contribute to their delivery.

- DART – the investment being made in the DART is particularly welcome, representing as it does a step change in terms of connectivity between Luton Airport Parkway station and the airport. Linked to the work to identify opportunities to increase rail share, the scheme promoter should identify whether an increase in the capacity of DART is required in order to enable the proposed expansion meet the surface access requirements identified above. Where an enhancement in the capacity is required the scheme promoter should identify how they will contribute to its delivery.
- Bus and Coach Provision – the proposal to establish a new coach station and a new bus station is welcomed. However there is a need for the promoter to work with service providers to identify the level of services required in order to enable the proposed expansion meet the surface access requirements identified above. Where this requires a broadening in the range of destinations served by buses and coaches the scheme promoter should identify how they will support their delivery.



- Car Parking – it is noted that the current proposal would result in a 48% increase in car parking spaces provided at the airport. The promoter should actively look to realise the potential of the above opportunities before seeking to make the case for any increase in on-site parking. Where a case for increased car parking can be made, every effort should be taken by the promoter to keep it to the absolute minimum.
- Highway Investment – the wider economic benefits realised by the proposed expansion is likely to galvanise New Century Park and require land use reconfiguration within the Enterprise Zone in the form of new offices and light industrial development that are associated with the proposed second terminal.

Proposals for Century Park Access Road and A505 Vauxhall Way were included in the first 5-year Major Road Network Investment Programme submitted to DfT in July 2019. An announcement on the funding for these two schemes is awaited. Whilst it is reasonable to plan on the basis that both schemes are delivered the promoter should set out the implications for their proposal of one or other (or indeed both) not securing funding from DfT.

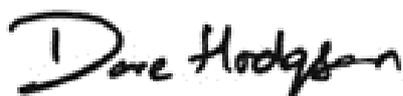
### *Wider Environmental Considerations*

The promoter proposes a range of different mitigation approaches to offset the impact of the airport expansion at surface level on the environment. Whilst these are welcome, there is a need for the promoter to quantify how they will ensure the proposal is consistent with the national targets to bring greenhouse gas emissions to net-zero by 2050. This is pertinent, not only for surface access to the airport but also given the need for the aviation sector to make its own contribution towards achieving the net zero carbon target for the UK by 2050.

In conclusion, whilst supportive of the principle of expanding Luton Airport, that support is conditional upon the scheme promoter being able to demonstrate that the package of supporting measures is sufficiently robust and deliverable.

Based on the evidence to date EEH is not convinced that the current proposal meets this requirement. This response identifies those aspects of the proposal that we consider need further attention. Given the strategic significance of the airport as an international gateway and focus for economic opportunities we would welcome the opportunity for an on-going dialogue with London Luton Airport Limited through which a more appropriate package of supporting measures might be developed and promoted.

**Mayor Dave Hodgson**



**Chair, Strategic Transport Forum  
England's Economic Heartland**

