

27 June 2023

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Your Ref: TR020001

Dear Jo Dowling,

Planning Act 2008 (as amended) - Section 89

The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 9

Application by London Luton Airport Limited for an Order Granting Development Consent for the London Luton Airport Expansion project

Procedural Decision made under Section 89(3)

Thank you for your letter of 13 June 2023, which included additional Procedural Decisions requesting further information from Luton Rising (a trading name of London Luton Airport Limited) ('the Applicant') in addition to the earlier request for information contained in your Procedural Decision letter of 16 May 2023.

This letter provides a consolidated response to both of the Examining Authority's ("ExA's") Procedural Decision letters as agreed with the Planning Inspectorate Case Manager (Sian Evans) on 16 June 2023, as confirmed in the paragraphs below.

- A response to the request for additional noise information in the Procedural Decision letter dated 16 May 2023 see Table 1 below.
- Further information, additional submissions and amendments requested by the ExA in Annex B of your letter of 16 May 2023 – see Table 2 below.
- Additional information and detail on a review of transport modelling in light of new
 Department for Transport advice, noise and scheme design are provided, as
 requested by the ExA in your letter of 13 June 2023 see Table 3 below. Table 3
 also includes a response to the ExA's request (by 9 August 2023) for additional

information on the Landscape and Visual Assessment and for a Glint and Glare Assessment.

 As part of this response, the Applicant has also independently identified a limited number of consequential amendments to the submitted documentation which were not identified in the ExA's letter of 16 May 2023 – see Table 4 below.



Table 1 - The Applicant's response to the Rule 9 Procedural Decision dated 16 May 2023

Ref.	Rule 9 request for further	The Applicant's response to the
	information	request
1a	To ensure clear understanding of the	The requested information has been
	noise survey and data compilation	provided in Ambient noise monitoring
	approach, the ExA has made a	data and survey sheets
	procedural decision to request	[TR020001/APP/5.11]. The document
	BS7445 survey datasheets/	contains the survey data sheets for each
	monitoring reports (or equivalent) for	of the attended and unattended ambient
	each of the attended noise monitoring	noise monitoring locations as well as the
	locations, showing full details of	meteorological data used to exclude
	location and set up information. The	adverse weather periods from the
	information provided should include	ambient noise monitoring.
	the meteorological data used to	
	exclude adverse weather periods	Please note that two versions of this
	from the baseline datasets.	document has been submitted; one
		confidential version which includes
		monitoring site addresses / site staff
		names and another redacted version for
		public consumption.
1b	To provide a clear comparison of the	The requested information has been
	Applicant's proposed noise controls	provided in Comparison of consented
	with the airport's existing operational	and proposed operational noise
	controls, the ExA has made a	controls document
	Procedural Decision to request a	TR020001/APP/5.12]. This document
	summary table setting out the current	contains a brief description of the current
	consented operational noise controls;	consented noise controls, how these are
	the proposed operational noise	proposed to be amended in the
	controls under application reference	15/00031/VARCON¹ proposals and how
	15/00950/VARCON and the current	an entirely new and enhanced noise
	application for Development Consent.	control process is proposed in the
	This should summarise matters	Development Consent Order (DCO).
	including, but not limited to, day time	
	and night time operational noise	Summary tables are provided setting out
	contours and any future contour	the current consented operational noise
	reductions, air traffic movement	controls; the proposed operational noise
	limits, quota count limits, operational	controls under application reference
	restrictions (including engine testing)	15/00031/VARCON and the current
	and any noise penalties.	application for Development Consent.

¹ The planning application reference stated in the ExA letter of 16 May 2023 was 15/00950/VARCON, however, the ExA has confirmed in subsequent communications that the intended planning application reference was 15/00031/VARCON



Table 2 - Annex B amendments as requested in Rule 9 Procedural Decision dated 16 May 2023

Amendment	Exam	Document	PINS Comments	Applicant's Response to the Rule 9 Annex B
Ref.	Library Reference			amendments
1a	APP-032	ES Chapter 5	Paragraph 5.4.9 refers to the Design Principles Document reference as TR020001/APP/7.10. The correct document reference is TR020001/APP/7.09.	Reference has been corrected.
1b	APP-032	ES Chapter 5	Inset 5.1 (document page 29) background mapping is illegible. Provide a replacement figure, with OS 1:50,000 base mapping, or improve legibility of current figure.	The image provided as Inset 5.1 is taken directly from the publicly available airspace change document referenced in the heading. It is provided to give an illustrative indication of the change to flightpaths for consideration in a qualitative sensitivity test only. Due to the current level of advancement of air space change discussions, a higher resolution image is not available at this stage.
2	APP-034	ES Chapter 7	Table 7.2 is titled 'Air quality standards from the Regulations 2020'. Confirm whether this this should be reference to The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020.	The heading for Table 7.2 has been amended to The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020 as suggested. Appropriate amendments have also been made to Table 7.1 where relevant.
3a	APP-036	ES Chapter 10	It is assumed criterion g. on document page 2 should state 'Section 10.9'. Please correct.	The cross reference in criterion 'h' had an incomplete link which has now been corrected to 10.9. It is assumed that this was the correction required rather than criterion 'g' quoted.



3b	APP-036	ES Chapter 10	In Table 10.6 on document page 20, it is stated under the column 'Meeting name and date' in Table 10.6 "14 December 2021. A Teams meeting with officers from Historic England to discuss results of 2022 PEIR". Please review if these dates are correct.	The dates are correct. The meeting was to discuss the results of the draft PEIR. The year has been replaced with 'draft' in Table 10.6 to avoid confusion.
3c	APP-036	ES Chapter 10	 There appears to be errors in the assessment of effects in respect of references to proposed works and the phases they would be developed in, when read against the details in the submitted Scheme Layout Plans (AS-010) and Proposed Development Figures (AS-042). For example: Paragraph 10.9.16 refers to the potential for piling that may be required during assessment phase 1 for the new decked car park P9 (work number 4o(02)). However, the submitted plans proposes reconfiguring the existing surface car park in phase 1 (work number 4o(01)) and the provision of the new decked car park in phase 2a. Paragraph 10.9.20 refers to the Surface Movement Radar (SMR) tower (work number 2a(02)) proposed during assessment phase 2a. However, the submitted plans identifies this in Phase 1. Paragraph 10.9.23 refers to works to the SMR and Car Park 3 taking place in phase 2a, 	That is, decked car park moved to assessment Phase 2a, Surface Movement Radar and car park moved to assessment Phase 1. Subsequent dependent text has also been updated to reflect changes.



			which the submitted plane propose in phase	
			which the submitted plans propose in phase	
			1.	
			Please review section.	
3d	APP-036	ES Chapter 10	Garden' being located approximately 2.5km south east of the Main Application Site but paragraph 10.7.42 refers to it being located approximately 1.5km south west of Luton Town Centre. Rectify this discrepancy.	This discrepancy has been corrected to make clear that the 'Improvement Garden' is located approximately 2.5km south west of the Main Application Site, not south east.
4a	APP-039	ES Chapter 13	reads "A sensitivity has of the quantitative assessment using these updated ERFs has been undertaken as agreed whas HAS/OHID." Confirm correct wording.	The sentence has been updated to read "A sensitivity test of the quantitative assessment using these updated ERFs has been undertaken as agreed with HSA/OHID."
4b	APP- 039 and APP- 151	ES Chapter 13 and ES Figure 13.	Paragraph 13.7.6 on document pages 48 and 49 refers to Figure 13.2 and lists a number of footpaths adjacent to the airport but only some are labelled in the figure. Provide an updated Figure 13.2 with labels for all footpaths referenced in paragraph 13.7.6 (e.g. FP29/38 or BW28/37).	Figure 13.2 has been updated to include labels for relevant footpaths and bridleways. The start and end point for each footpath and bridleway shown has also been added. Note that Chapter 13 and Chapter 14 incorrectly referred to FP38 instead of FP39 – this has now been corrected in the chapters and relevant appendices 14.4 and 14.5 and Revision 1 provided. FP39 is shown on Figure 13.2.
4c	APP-039	ES Chapter 13	Lack of clarity as to where some information provided in summary Table 13.20 is addressed. Update Table 13.20 to provide cross reference to where each of the effects summarised in the table is assessed in the ES text.	Where appropriate, for potentially significant effects, section and paragraph cross references have been added to the final column 'Residual Effect' of Table 13.20, referring to where further detail on the assessment is provided in Chapter 13 of the ES.



5	APP-040	ES Chapter 14	Paragraphs 14.5.14 and 14.5.18 refer to Tables 1.1, 1.2, 1.3, 1.6, 1.7 and 1.8 in Appendix 14.1 of the ES (AS-036) although these do not exist. It appears that this should instead refer to Tables contained in Chapters 5 and 6 of ES Appendix 14.1 covering both landscape and visual receptors. Please confirm if this is the case and correct references.	The paragraphs identified have been updated with correct cross references to the appropriate tables in Appendix 4.1.
6a	APP-042	ES Chapter 16	Paragraph 16.9.153 references four schools but only lists two. Reference remaining schools or amend quantity as appropriate.	The identified typo has been corrected in ES Chapter 16. It now correctly refers to two schools.
6b	APP-042	ES Chapter 16	State time interval (T) applied in Table 16.30 on document page 90.	A footnote has been added to Table 16.30 (and equivalent tables for the other assessment phases – 16.32 and 16.33) to clarify the time interval.
6c	APP-042	ES Chapter 16	Paragraph 16.9.219 reports on numbers of households affected as set out in Table 16.70 but appears to understate the number of buildings predicted to experience an increase in daytime road traffic noise. Confirm whether paragraph should read approximately 27,704 rather than 27,400	The identified typo has been corrected in ES Chapter 16. It now correctly refers to approximately 27,704 residential buildings.



7	APP-048	Appendix H on	Inconsistency between figures reported in Appendix H and Tables within main text: • Phase 1 Earthworks granular imported – 72,000m3, Table 4.3 identifies 43,000m³ • Phase 2a imported 240,000m3, Table 5.2 identifies 289,000m³ • Phase 2b 179,000 import, Table 6.2 identifies 211,000m³ Amend tables as relevant. Provide updates to any assessments, that depend on this data, where necessary (e.g. transport, air quality, noise).	Figures in Appendix H have been aligned with tables within the main text within ES Appendix 4.1 Construction Method Statement and Programme Report: - Phase 1: imported granular fill is 43,000m3 - Phase 2a: imported granular fill is 289,000m3 - Phase 2b; imported granular fill is 211,000m3 The total imported granular in Appendix H has also been amended to 543,000m3 to be consistent. A review of other ES chapters dependent on these figures has been undertaken. Tables 19.37, 19.38, 19.39, 19.40, 19.41 19.42, 19.43, 19.45, 19.51, 19.52, 19.53 of ES Chapter 19 Waste and Resources and Tables 4.1, 4.2, 4.3, 4.4, 4.5 and paragraphs 4.3.1 and 4.3.3 of ES Appendix 19.1 have been amended and Revision 1 issued to align with amended ES Appendix 4.1 figures. For the materials assessment this change would lead to a slight increase in % of national and regional material demand, however this does not constitute sufficient to change the significance determined. For the waste assessment there is no change in % landfill capacity, therefore no change to the significance determined.
				ES Chapter 7 Air Quality, 12 Greenhouse Gases, 16 Noise and Vibration and 18 Traffic and



				Transportation have been reviewed and this correction does not represent a material change, therefore no revision is required. No other ES chapters were affected by the amended figures.
8	APP-076	ES Appendix 10.5 Archaeologic al Trail Trench Evaluation Report Cotswold 2019	Contains a solid black horizontal line at the bottom of every page of the main report, covering lines of text. Submit revised document removing rectifying this.	The PDF document issued from the issue record copy does not contain this black line. The document has been recompiled, pdf'd and Revision 1 provided.
9	APP-087	ES Appendix 13.5	Footnote 4 on document page 2 is incomplete. Provide full wording.	Rather than complete the sentence, the incomplete sentence text in the footnote has been deleted as it was not required.
10	APP-090	ES Appendix 14.3 Arboricultural Impact Assessment	The third bullet point within the Executive Summary (electronic page 6) identifies a total of 575 tree features proposed for removal (356 + 219) although the subsequent breakdown of trees per category adds up to 574. Similarly, Table 2 on electronic page 11 identifies a total of 570 tree features proposed for removal although	The document has been reviewed and where relevant, numbers have been amended to be consistent, including those identified in the comment.



			paragraph 3.1.2 states 575 tree features are proposed for removal. Confirm correct numbers.	
11	APP-098	ES Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 33- 41	APP-152 Figure 14.8 identifies VP35A – Footpath (Kings Walden 005) but this has not been included in APP-098. Please submit this viewpoint.	Viewpoint 35A has been added and ES Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 33- 41 Revision 1 issued.
12	APP-099	ES Appendix 14.6 Winter and Summer Photography Viewpoints 42- 50	The location of Viewpoint 43 shown on the Location Plan inset is incorrect and shows the location of Viewpoint 2. Please rectify and also carry out a review of all other inset maps accompanying the viewpoints to ensure the correct locations are identified.	The location of Viewpoint 43 has been corrected in the inset map. All other Viewpoints have been reviewed and minor amendments made where corrections or clarifications were deemed appropriate, such as realigning the viewing cone slightly or clarifying description of direction in the text. A full set of Viewpoints in Appendix 14.6 has been issued as Revision 1.
13	APP-110	ES Appendix 16.1	Table 7.5 highlights the AR2 day time DS result in red suggesting that it exceeds SOAEL but the value is below the 63dB Laeq,16h threshold. Provide amended table with corrected colour or value.	Appendix 16.1 has been updated with the corrected colour coding.



			 Similar issue in Table 7.6 for receptors AR2 and AR13. Table 8.3 GR1 colour incorrect for night. Table 8.4 issues with colours for GR1 (night), GR2/3 (day and night), GR4/5 (night), GR7/8 (night). Table 12.20 AR2 colour incorrect (day) unless rounding, AR12 (night). Table 12.29 AR2 (day). 	
14	APP-147 to 149, and APP- 154 to 159	Chapter 7 Air quality figures and Chapter 16 Noise and vibration figures	For ease of navigation, provide new figures with a hyperlinked figure list at the start of each pdf.	The Chapter 7 and 16 Figures updated in response to comments have been repackaged to account for file size and a hyperlinked figure list provided at the start of each figure package.
15a	APP- 147 and APP- 148	ES Chapter 7 Air Quality Figures 7.1- 7.3a and ES Chapter 7 Air Quality Figures 7.3b- 7.26	Air Quality Management Areas (AQMA) are listed in the key but not visible in Figure 7.3a due to overlay of layered information. Amend figure to also show AQMA extents. The same issue applies in Figure 7.3b page 1 of 11, page 4 of 11 in West Hitchin, page 5 of 11 extent of Dunstable AQMA and Figure 7.3e.	In response to further comment below, Figure 7.3a has now been expanded over 23 sheets/pages to allow modelled human receptor to be individually labeled. Page 1 provides an overview of features in the study area. The AQMA's are still difficult to see on this first page but have been labelled, and are clearly visible on the larger scale pages 2 to 23.
				The AQMA's have also been labelled on 7.3b pages 4 and 5 and clearer blue shading with a bold boundary provided. Figure 7.3e has been expanded over 7 pages, with the AQMAs labelled on the Page 1 overview, and clearly shown and labelled on pages 2 to 7, as well as the modelled



				compliance receptors and PCM links, at a larger scale.
15b	APP- 147 and APP- 148	ES Chapter 7 Air Quality Figures 7.1- 7.3a and ES Chapter 7 Air Quality Figures 7.3b- 7.26	Each of the Figures 7.3a and 7.3d should be provided as one or more plans on OS 1:25,000 base that show the receptor numbers to allow ease of cross reference with tabulated data.	Figure 7.3a and 7.3d have now been expanded over 23 sheets/pages and use the OS 1:25,000 (Explorer) base map and AQMA's labelled. However, the greyscale setting has been used for the base maps to allow the information for which the figure has been designed to show to stand out, rather than be lost in the multicolored standard OS symbology. In Figure 7.3a each modelled human receptor is individually labelled and can be readily cross referenced with the tabulated data provided in the ES. However, Figure 7.3d shows every human receptor within 200m of the Affected Road Network ARN for statistical use in the Health Impact Assessment reported in Chapter 13 of the ES [APP-039] and are therefore not individually numbered. A note has been added under the legend above
16	APP-148	ES Chapter 7 Air Quality Figures 7.3b-	Query whether extent of coloured area in Figures 7.25 and Figure 7.26 is correct. Amend where relevant.	the revision history explaining this. The incorrect take off direction in Figure 7.25 and Figure 2.26 have been deleted leaving only the correct one.



		7.26		
17a	APP-149	ES Chapter 7: Air Quality Figures 7.27- 7.43	Dark orange colouring in Figure 7.27 is not present in the key. Provide a replacement figure with updated key or figure content where relevant.	The apparent darker orange was a result of colours overlapping rather than an omission. The locations at different assessment phases have been changed to coloured hatching to allow colour differentiation and overlaps to be seen clearly.
17b	APP-149	ES Chapter 7: Air Quality Figures 7.27- 7.43	Contour plots provided for 2027 case in Figures 7.41-7.43 should also be provided for assessment phases 2a and 2b with OS 1:25,000 base mapping. The location of any AQMAs should be clearly shown on these plans.	The following figures have been prepared and added to the revised air quality figure file now titled '5.03 Environmental Statement Chapter 7 Air Quality Figures 7.27 – 7.49: Figure 7.44 Assessment Phase 2a Core (2039): Annual mean Nitrogen Dioxide (NO ₂) contour plot; Figure 7.45 Assessment Phase 2a Core (2039): Annual mean PM ₁₀ contour plot; Figure 7.46 Assessment Phase 2a Core (2039): Annual mean PM _{2.5} contour plot; Figure 7.47 Assessment Phase 2b Core (2043): Annual mean Nitrogen Dioxide (NO ₂) contour plot; Figure 7.48 Assessment Phase 2b Core (2043): Annual mean PM ₁₀ contour plot; and Figure 7.49 Assessment Phase 2b Core (2043): Annual mean PM _{2.5} contour plot. All contour plots have been updated with the OS 1:25,000 mapping product, scaled appropriately, and in greyscale so that coloured contours do



18	APP-152	EC Chantar 14	Figure 14.2 does not show the Order limits	not clash with OS colours. At the scale these plots are shown there are no AQMAs located in the figure frames.
10	APP-102	ES Chapter 14 Landscape and Visual Figures 14.1- 14.17	Figure 14.2 does not show the Order limits identified in the Legend.	The Order Limits have been added and the figure re-issued.
19a	APP-154	ES Chapter 16 Noise and Vibration Figures 16.1- 16.20	Figure 16.1 shows Noise Important Areas in green. The scale of the plan and low resolution base mapping makes it difficult to understand the overlap between the proposed development and these areas. Provide updated Surface Access noise contour maps showing Noise Important Areas on 1:50,000 base mapping.	Figure 16.1 has been updated with an OS 1:50,000 base map and the colour coding of the Noise Important Areas has been updated for clarity. All Surface Access figures have been updated with an OS 1:25,000 base mapping (which has been chosen for clarity as it provides higher resolution for the smaller scale Surface Access figures) and the Noise Important Areas have been added to these figures.
19b	APP-154	ES Chapter 16 Noise and Vibration Figures 16.1- 16.20	Unable to clearly make out map based information below contours information. Unable to accurately locate monitoring locations in Figure 16.3. Unable to clearly see extent of Noise Important Areas with respect to proposed works locations. Reproduce figures with OS 1:50,000 base maps.	1:50,000 base map. It has also been split into a greater number of sheets to allow the scale to be



20	APP-194	Planning Statement	It is assumed, based on the figures quoted in the two subsequent paragraphs, that the word 'people' should follow the figure of 3,800 in the last sentence of Paragraph 8.6.19. Confirm if this is the case.	Text corrected. The word 'people' has now been added to follow the figure of 3,800 in Paragraph 8.6.19.
21	APP-204	Transport Assessment Part 2 of 4	Paragraph 8.4.5 onwards to the end of the document (including Table 8.4) duplicates that from paragraph 9.5.26 of part 3 of 4 of the Transport assessment (APP-205). Please clarify if the section from paragraph 8.4.5 onwards to the end of the document is correct.	Paragraph 8.4.5 onwards (including Table 8.4) to the end of the document is a duplication of content in the Transport Assessment Part 3 of 4 and has therefore been deleted (in part 2 of 4).
22	APP-208	Design and Access Statement Volume II	Figure 5.5 labels airport taxiways but appears to omit Taxiway I. Add label for Taxiway I to figure.	Taxiway I is not required and the label within the key has been removed from figure.
23	APP-213	Need Case	Figure 6.28 on document page 94 refers to the runways as 08 and 26 respectively. All other references appear to be 07/25. Provide updated documents addressing the discrepancy.	The original Figure 6.28 pre-dates the change in runway magnetic bearing due to changes in the earth's magnetic field. The text reflected the up to date runway bearing and Figure 6.28 has now been updated to reflect the same. There are no other changes to the figure.
24	APP-227	Equality Impact Assessment	An updated and track changed version of APP- 227 Equality Impact Assessment should be provided to address a number of minor discrepancies, as follows: • Employment section numbering from page 27 restarts at 4.4.1, repeating numbering from page 19. A renumbered version with any cross references updated should be provided.	These discrepancies have been corrected and both track-changed and clean versions of Revision 1 have been provided.



 Paragraph 7.2.6 states that four schools will exceed noise level criteria in Phase 2b but then lists two schools (Surrey St Primary and the Avenue Centre for Education). Summary Table 10.1 identifies a beneficial effect for accessibility and severed footpaths in relation to the characteristic "Age – children under 16", "Age – children 16-24", "Pregnancy and maternity" however the text at paragraphs 7.2.14, 7.2.15, 7.3.3 and 7.7.6 only identifies neutral or adverse effects.
Summary Table 10.1 identifies a beneficial effect for accessibility in relation to the characteristic "Age – older people aged 65 and over", however the text at paragraph 7.4.10 suggests no differential effects.
Summary Table 10.1 identifies adverse construction effects on ProW accessibility in relation to the characteristic "Disability", whereas paragraph 7.5.1 states that no adverse differential or disproportionate effects on those with disabilities have been identified.
Summary Table 10.1 states that effects on the characteristic "Gender Reassignment" are neutral with mitigation, however the text in paragraphs 7.6.1 and 7.6.2 state that they are beneficial.



25	APP-229	Framework Travel Plan	Figure 6.2 appears to be missing two tables of data for Targets 3A and 3B.	There are no tables missing from Figure 6.2. Tables are not presented for Targets 3A and 3B because the reissued ASAS (2019) did not report yearly results for these two targets. Text has been added to Paragraph 6.2.4 to say 'Yearly results were not reported for Targets 3A and 3B'
26	AS-005	Draft Development Consent Order and Consents	 Contains the following typographical errors: R2(3) 'approval sought is would not give rise'. R6 table entry for Luton DART final column should read 'and excludes development'. R20(7) 'The bodies invited to nominate technical representative.' should read 'a technical representative' or 'technical representatives'. R20(9) should either read 'Each Technical Panel' or 'their terms'. R24(4)(b) should read 'received the Mitigation Plan' R24(5) should read 'A mitigation Plan' R28 should read 'with the fixed plant' R37(14) should read 'the Department for Levelling Up, Housing and Communities and the Ministry for Housing' 	The typographical errors have been corrected.



27a	AS-007	Explanatory Memorandum	Paragraph 4.25 reads in the second sentence – 'an exceedance of an air quality it is considered'. Confirm whether this should read air quality 'threshold or limit' it is considered	The Explanatory Memorandum has been updated to include the wording 'Threshold or Limit' in paragraph 4.25.
27b	AS-007	Explanatory Memorandum	Paragraph 4.38 typographical error – 'and a processes to vary'.	This typographical error has been corrected.
28	AS-008	Statement of Reasons	Paragraph numbering restarts/repeats after paragraph 12.1.7.	The paragraph numbering has been corrected.
29	AS-010	Scheme Layout Plans	Assessment Phase 2a – Two stockpile areas proposed to west of Winch Hill Road annotated as 'F' instead of 'G'.	These discrepancies have been corrected.
30a	AS-050	Draft Compensatio n Policies, Measures and Community First	New Figure 9.2 (Community First Zone) should be Figure 9.1. PDF title is 'Compensation Policies and Measures Final at 12 Jan', given that the Issue 1 was dated February 2023 this title seems at odds with the revision history. Retitle.	Figure 9.2 has been relabeled as Figure 9.1. The updated document is dated June 2023 and is titled Draft Compensation Policies, Measures and Community First.
30b	AS-050	Draft Compensatio n Policies, Measures and Community First	Appendix A contains an Indicative Noise Contour plan. Provide a copy of the plan at A3 with a 1:50,000 Ordnance Survey Landranger background for each assessment phase and provide a second set of plans with the current eligibility contours overlaid on the new contours in a different colour.	Figures have been added to the document with a 1:50,000 OS base map as requested. Figures A1.1 to A1.3 are provided in Appendix A Part 1 and present indicative plans representing the potential extent of the proposed noise insulation schemes using the forecast noise contours from Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01].
				A second set of indicative plans (Figures A1.4 to



A1.9) are provided in Appendix A Part 2, showing the potential extent of the proposed noise insulation schemes overlaid with the extent of the current noise insulation schemes. Due to the number of different schemes (current and proposed), this second set of plans has been separated by daytime and night-time.
As these plans are for indicative purposes only, and are based on forecast noise contours, inclusion within the boundary of the plans does not definitively mean that a property would be eligible for noise insulation under the proposed scheme. Similarly, being outside of the boundary of the plan does not definitely mean that a property would not be eligible.

Table 3 - The Applicant's response to the Rule 9 Procedural Decision dated 13 June 2023

Ref	Request for additional information	The Applicant's response to the request
Accountin	g for COVID-19 in transport modelling	
1	The Applicant provided a high-level indicative programme	Response provided in Appendix A of this cover letter.
	[AS-051] in response to our previous Procedural Decision.	
	The ExA requests that detail be added to the timetable	
	provided. This should describe each stage of the process in	
	sufficient depth to allow the ExA to understand how the	
	requirements of the guidance will be addressed, including	



	how any significant changes would be accommodated in the work programme and when the appropriate stakeholders will be engaged.	
Contour P	lots	
2	It would be beneficial for ground noise contour plots to be re-provided for all phases with solid colour rather than contour lines for clarity. Colour overlays should be sufficiently transparent to enable basemap detail to remain legible.	All ground noise figures have been updated with solid colour contours rather than lines. The overlays have been made transparent so that the updated OS 1:25,000 base map is visible and legible underneath.
Additiona	l drawings	
3	The ExA requests that elevation and arrangement drawings for proposed car parks P1 (Work 4g) and P2 (Work 4h) are submitted.	Three additional indicative general arrangement drawings have been prepared showing the elevation and car port arrangements for proposed car parks P1 and P2. Drawing numbers: LLADCO-3C-ACM-INF-MSC-DR-AR-0002, 0003 and LLADCO-3C-CAP-STR-PRK-DR-AR-1294. The description of Work No. 4h in Chapter 4 of the ES has been corrected from 3.85m to 5m allowance for solar panels and Revision 1 issued. This was a typo and is now consistent with other descriptions and considered correctly in the ES.
Landscap	e and visual	
4	Existing Representative Viewpoints [AS-037 to AS-041] should be annotated with Works Nos., and descriptions where possible, in a similar way to the baseline photographs in ES Appendix 14.6 [APP-093 to APP-100]. This is	Existing Representative Viewpoints [AS-037 to AS-041] will be updated to include annotations of existing buildings and features and work nos. in a similar way to the baseline photographs in ES



		A 1: 44.0 [ADD 000 ADD 400] T' ' ' ' ' '
	notwithstanding that the text accompanying the Assessment	Appendix 14.6 [APP-093 to APP-100]. These viewpoints will be
	Viewpoints includes reference to the Work Nos. that may be	provided by the requested deadline of 9 August 2023.
	seen at each viewpoint. Trees and hedges to be retained,	
	removed and replanted should be indicated using circled	Circled coloured lines will be used to indicate where removal and/or
	coloured lines in each Representative Viewpoint.	replanting of trees and hedges would be visible. It is not proposed
		to use circled coloured lines to show retained trees and hedges in
		order to ensure that the Representative Viewpoints are as legible
		as possible. A note will be added to the Representative Viewpoints
		to explain that trees and hedgerows not annotated will be retained.
		It is also not proposed to update Existing Representative
		Viewpoints where there won't be any changes through replanting or
		removal of trees or where all trees in any viewpoints are to be
		retained.
5	The ExA also requests that the following Assessment	Assessment Viewpoints 20, 36 and 53 will be developed as
	Viewpoints are developed as Representative Viewpoints.	Representative Viewpoints to include the 'Rochdale Envelope' of
	This should include: the 'Rochdale Envelope' extent of all proposed built form; a written annotation of Works Nos.,	the proposed development and a written annotation of Works Nos.
	with descriptions where possible; and trees and hedges to	with descriptions will be added where appropriate. Where trees are
	be retained, removed and replanted indicated using circled	proposed to be removed and replanted, this will be indicated using
	coloured lines in each Representative Viewpoint.	circled coloured lines.
	TELEBRICE MISS III SUCH TEPPOSONIALITO TIOMPONIA	
	 Assessment Viewpoint 20 [APP-096]; 	The location of the New AAR will be shown in Assessment/
	Assessment Viewpoint 36 [APP-098]: This should	Representative Viewpoint 36. The proposed changes to the
	also include the location of the New Airport Access	vegetation at operation year (2043) and at design year (2056) for
	Road on Dairyborn Escarpment and changes to the	VP36 will be provided in illustrative form as the detailed landscape
	vegetation. A separate visual showing landscape	·
	restoration (Work Number 5a) would also be	design is not available at this stage but is a Requirement included
	beneficial; and	in Schedule 2 to the draft DCO.



	 Assessment Viewpoint 53 [APP-100]: This should include illustration of the proposed new bridge over Airport Way. 	The proposed new bridge over Airport Way in Assessment/ Representative Viewpoint 56 will be provided as an illustration only as the detailed design of the bridge is not available at this stage.
6	It is also requested that illustrations showing the proposals at all phases from each of the viewpoints listed below are provided. These should include the 'Rochdale Envelope' extent of all proposed built form annotated with Work Nos. and identification of trees and hedges to be retained, removed and replanted. In addition, it is requested that full, photo-realistic illustrations of the proposed landform platform (Work No. 1a) at each of the three phases and surface car parking areas P10 and P11, including solar panels, is included on each of these viewpoints. • Assessment Viewpoint 28 [APP-097]: The field of view should be extended to include elements of the Proposed Development situated to the right of the existing viewpoint location; • Assessment Viewpoint 56 [APP-100]; • Representative Viewpoint 10B [AS-038]; • Representative Viewpoint 13 [AS-038]; and • Representative Viewpoint 31 [AS-040]: This should include a 500mm viewing distance for Phase 2b.	 Illustrations showing the proposals at each of the three phases from the viewpoints listed below will be provided: Assessment Viewpoint 28 [APP-097]: to include extended field of view to include elements of the Proposed Development situated to the right of the existing viewpoint location; Assessment Viewpoint 56 [APP-100]; Representative Viewpoint 10B [AS-038]; Representative Viewpoint 13 [AS-038]; Representative Viewpoint 31 [AS 040]: to include a 500mm viewing distance for Phase 2b. These illustrations will include the 'Rochdale Envelope' extent of all proposed built form annotated with work nos. and trees and hedges to be removed and replanted indicated using circled coloured lines. Illustrations of the proposed landform platform (Work No. 1a) at each of the three phases and surface car parking areas P10 and P11, including solar panels, can be included on each of these viewpoints, though in simple block form as these elements have not been designed in detail and not included within the DCO application.
7	Assessment Viewpoint 41 [APP-098 and AS-041] is now located in the grounds of a private residential property and	Assessment Viewpoint 41 [APP-098 and AS-041] and accompanying Representative Viewpoint will be relocated onto



	therefore not easily accessible (see Note of Unaccompanied	footpath Kings Walden 010 on the opposite side of Darley Road.
	` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `	1
	Site Inspection of afternoon and evening of 25 May 2023	The visual impact assessment on page 76 of ES Appendix 14.5
	[EV1-005]). The Assessment Viewpoint and accompanying	[APP-092] will be updated to reflect this change.
	Representative Viewpoint should be relocated onto footpath	
	Kings Walden 010 on the opposite side of Darley Road. The	
	visual impact assessment on page 76 of ES Appendix 14.5	
	[APP-092] should be updated to reflect this change.	
Glint and Gl	are Assessment	
8	Note 5 on drawing number LLADCO-3C-ACM-INF-MSC-	The Applicant can confirm that a Glint and Glare Assessment will
	DR-AR-0001 contained in General Arrangement Drawings	be provided by the requested date of 9 August 2023. This will be a
	part 2 of 3 [AS-019] states that a Glint and Glare	desk top assessment will identify locations within the proposed
	Assessment will be required at the detailed design stage.	development suitable for hosting solar panels and provide an
	However, the ExA considers that such an assessment	overview of predicted performance.
	should be provided as part of the application to allow the	·
	assessment of any effects to be subject to	Based on the outcome of this initial assessment, further
	examination.	modelling/analysis may be required for certain some proposed
	Statimation.	
		solar panel locations within the development.
		Please note this further assessment can only be completed after
		the 9 August.

Table 4 Consequential document amendments

Amendment	Document	Amendment made
Ref.		



1	Introduction to the Application	Amendment required to list of SOCGs in para 4.3.11 to include individual host local
		authority SOCGs
2	Consents and Agreements Position	Amendment required to list of SOCGs in para 5.1.3 to include individual host local
	Statement	authority SOCGs
3	Application Document Tracker	Required as a result of all Rule 9 amendments.



I trust this letter is helpful. Please get in touch if you would like to discuss any of the matters detailed above.

Yours sincerely,



Antony Aldridge Head of DCO Programme

Encl. Appendix A - Accounting for COVID-19 in transport modelling (in response to Rule 9 Procedural Decision dated 13 June 2023)



Appendix A - Accounting for COVID-19 in transport modelling (in response to Rule 9 Procedural Decision dated 13 June 2023)

On 16 May 2023 the ExA requested that the Applicant reviews its transport modelling in light of new Department for Transport (DfT) interim advice, dated April 2023, regarding the treatment of the COVID-19 pandemic in transport modelling.

The Applicant's response of 31 May 2023 described how it proposes to address the interim advice and provided an indicative timescale.

On 31 May 2023, the DfT also issued its full advice regarding the treatment of the COVID-19 pandemic in transport modelling as set out in the updated TAG Unit M4: Forecasting and Uncertainty.

In the letter of 13 June, the ExA stated it 'has made a Procedural Decision to request that the Applicant reviews its transport modelling considering the recently published guidance. The ExA also requests that the Applicant engages with stakeholders, including National Highways and the Local Highway Authorities, at the earliest possible opportunity with a view to gaining agreement as to the appropriate methodology if the model is not re-based.' The ExA has further requested that detail be added to the timetable provided in the Applicant's letter of 31 May 2023 to 'describe each stage of the process in sufficient depth to allow the ExA to understand how the requirements of the guidance will be addressed, including how any significant changes would be accommodated in the work programme and when the appropriate stakeholders will be engaged. This should be provided by 27 June 2023.'

The DfT's full advice on accounting for COVID-19 contains the following key statements:

- 'Rebasing of models takes time and resources; the Proportionate Update Process in TAG allows judgments of proportionality to be made when considering to what extent models need to be updated relative to the scope of decisions required and the surrounding risks.' [extract from Para B.3.1]
- 'The summary recommendation is, where model rebasing is judged not to be practical, for analysts to assess the extent of the divergence of travel patterns and volumes from pre-pandemic projections, using the best available data and evidence.' [extract from Para B.3.2]
- 'There are several options as to how appropriate adjustments to transport models may be accomplished. There are examples of possible approaches set out below. It should be noted that other approaches may be acceptable, based on the best judgement and careful consideration of the analyst. Either way, it is important to clearly set out the assumptions and evidence used for any approach.' [extract from Para B.3.4]
- 'A judgment should be made on the most appropriate action relative to the risks to be mitigated.' [Para B.3.5]



The full advice provides three examples as follows:

- 'Create a forecast to the present day by applying adjustments to include a COVID-19 impact, based on observed data. This forecast can be used as a "new base year" as a substitute basis for scheme forecast.'
- 2. 'Apply adjustments to a forecast year model to produce a new scheme opening year forecast, or the first required forecast year, that include a COVID-19 impact to that point. This will be the new pivot off which further forecast years are based.'
- 3. 'Apply the adjustment globally to model results as a post-model adjustment.' [extract from Para B.3.4]

The first example is not considered proportionate, practical and feasible within a reasonable timescale due to the large amounts of required data, the need for validation checks and the time required to do so, which would extend beyond the anticipated period of the DCO examination. The second example would also not be considered proportionate, practical and feasible within a reasonable time scale because it requires adjustment to the National Trip End Model (NTEM) growth projections to take account of COVID-19.

It is understood that in the short-term, the DfT does not intend updating the NTEM to accord with the latest guidance and therefore we would effectively have to 'predict' the impact of COVID-19 on trip making behaviour and apply this to the NTEM data.

The third approach is, however, considered proportionate, practical and can be undertaken within a reasonable timescale.

Having reviewed the full advice including the above key statements and examples, we propose a proportionate approach, based on the third example, to accounting for the COVID-19 pandemic, which takes into account the size and complexity of the multi-modal strategic transport model (as previously described in the letter of 31 May 2023) and the timescale for the DCO examination.

The proposed approach includes the analysis of recent local and national trends in travel demands, updating the future year forecasts using the latest DfT projections Core scenario, assessment of the risks associated with the updated forecasts and determination of any necessary adjustment factors that may arise from the analysis of the recent trends. While the approach does not include rebasing of the strategic model (due to the large amounts of data, substantial costs and timescale over several months needed to reach suitable levels of model calibration / validation), it does include the analysis of recent trends in travel between the 2016 base year and current year, which will be dependent upon what 'historic' data can be collated over this period.

The proposed programme, with indicative timings, is set out on page 33 of this cover letter. The programme shows various technical, stakeholder engagement and reporting tasks set over several weeks, commencing in July and concluding by December 2023.



The proposed approach is:

Task 1: Stakeholder Meetings 1 – Scope. Virtual meetings will be held with each stakeholder to discuss the proposed approach. The meetings will be with National Highways and the local highway authorities (LHA) of Central Bedfordshire Council, Hertfordshire County Council and Luton Borough Council, and will form a continuation of the regular consultation with these organisations that has taken place throughout the preparation of the DCO documents. The proposed approach, which is described below in subsequent tasks, will be discussed and it is therefore possible that the approach may then be refined following these meetings.

Task 2: Collate available 2016 to 2023 Strategic Road Network (SRN) traffic count data and other national travel data (on-line). On-line data will be collated for national trends and the SRN to cover the period from the 2016 base year strategic transport model to the 2023. Specifically, data will be collated for sections of the M1, M25, A1(M) and A5/A5183. The Applicant will draw on several sources which for example may include (amongst others):

- National Highways WebTRIS data https://webtris.highwaysengland.co.uk/
- DfT MCC data https://roadtraffic.dft.gov.uk/#6/55.254/-6.053/basemap-regions-countpoints
- Transport use during the coronavirus (COVID-19) pandemic DfT statistics on transport use by mode since 1st March 2020
- Travel behaviour, attitudes and social impact of COVID-19 a study into the travel behaviour of people during and following the COVID-19 pandemic (also known as 'All Change')
- National Travel Survey (NTS) a household survey that collects information on how, why, when and where people travel as well as factors affecting travel

The data will be sourced and reviewed to identify trends in travel characteristics and volumes that have occurred since the base year strategic models were developed for the year 2016 and the present day (depending on the availability of up-to-date data).

Task 3: Request 2016 to 2023 Local Road Network (LRN) traffic count data from LHAs. The LHAs will be asked to supply traffic count data for key local roads over the 2016 to 2023 period. Ideally these data will largely include sites which are used for monitoring but may by necessity also include some ad hoc 'historic' survey data.

Task 4: Review of DfT Rail COVID-19 Scenarios. The DfT's latest Rail COVID Scenarios v.19.4, sourced from the Latest Earning Networked Nationally Overnight (LENNON) ticketing and revenue database, will be reviewed to assess how adjustments factors may be applied to the rail forecasts.



Task 5: Analyse traffic count, rail patronage and travel characteristics data to determine national and local trends since 2016. In particular, the collated SRN, LRN and rail patronage data will be analysed over the period 2016 to 2023 to assess the broad impact of Covid-19 on volumes. The other national data on travel characteristics will be used to help understand possible changes in trip purpose, mode choice, working-from-home, etc.

Task 6: Technical Note 1 on 2016 to 2023 trends. A technical note will be prepared on the analysis of recent trends in travel characteristics and demands, and how they relate to the strategic transport model.

Task 7: Stakeholder Meetings 2 - Recent trends. The findings of the technical note will be discussed with stakeholders.

Task 8: Update future years (FY) Uncertainty Log (UL) for development and infrastructure. The UL information for future year land use developments and future transport infrastructure will be updated. The UL was last updated in mid-2021 and shared with the stakeholders. Through previous stakeholder meetings, we are already aware of certain developments and infrastructure that have changed, plus new developments/schemes, which need to be taken into account. The update will include a thorough review of planning applications and local plans, and be undertaken in liaison with the stakeholders, as has been done previously.

Task 9: Update FY travel demands for UL, NTEM8 & NRTP22 - 2027, 2039, 2043.

The strategic transport model's travel demands are currently controlled to the DfT's NTEM7.2 and Road Traffic Forecast 2018 growth projections. The forecasts will be updated according to the updated UL and controlled to the DfT's latest NTEM8 for cars and public transport passengers, and National Road Traffic Projections (NRTP) 2022 for LGV and HGV growth projections. Future demands will be produced for the three key airport expansion years of 2027, 2039 and 2043.

Task 10: Produce transport demands for new additional year 2023. The updates of UL and NTEM8/NRTP22 will also be used to prepare transport demands for a new forecast year of 2023. This will be used for comparative purposes with the data collated (in earlier Tasks) over the 2016 to 2023 period.

Task 11: Run highway and public transport models - 2023, 2027, 2039, 2043 (via the Demand Model). The highway and public transport assignment models will be run and checked for the three key airport expansion future forecast years, plus the additional year of 2023. The airport expansion years will be run for both the Do Minimum without expansion and Do Something with expansion, whereas 2023 will be run for the Do Minimum only.

Task 12: Compare 2023 forecasts with 2023 counts and 2016 modelled base year. The 2023 forecasts will be compared with 2023 road traffic and rail patronage count data.



Task 13: Determine future year risks and need (if any) for adjustment factors. The 2023 modelled flows and observed count data will be compared, as will the trends over the 2016 to 2023 period. A view will then be taken into whether there are significant differences, if sufficient trend analysis data has been collated and if any difference may lead to risks in the forecasts in general, the Transport Assessment of the airport expansion, trigger points and levels of mitigation that have been proposed to accommodate the proposed airport expansion.

Task 14: Technical Note 2 Risk Assessment. A technical note on the risk assessment will be prepared setting out the need, if any, to consider adjustment factors to the future year forecasts. In particular, the technical note will pay attention to the TAG Unit M4 statement that 'A judgment should be made on the most appropriate action relative to the risks to be mitigated.' [Para B.3.5]

Task 15: Stakeholder Meetings 3 - Risk Assessment. The finding of the technical note will be discussed with the stakeholders.

Task 16: Produce adjusted FY road and rail forecasts (if required and subject to TN2). If required, a set of adjustments factors will be prepared for subsequent application to the future year model forecasts.

Task 17: Change and risk assessment. The adjustment factors will be applied to the forecasts, if and where appropriate. The adjusted forecasts will then be assessed to see if any previous conclusions and recommendations with the Transport Assessment may be affected by the change.

Task 18: Growth factors for VISSIM micro-simulation model. The updated forecast growth in traffic within the strategic transport model will be extracted for use in the local VISSIM micro-simulation model. The method for deriving growth will be via the production of cordon matrices by vehicle type for the smaller VISSIM area, for the base year and four future years for both the AM and PM peak period models.

Task 19: Traffic data for environmental assessment. Traffic data will be prepared for the airport expansion years of 2027, 2039 and 2043 both without and with airport expansion, using procedures that have already been set up and used for the previous forecasting, Transport Assessment and Environmental Assessment. The primary use of these data is for Air Quality and Noise assessment if determined as necessary by the subject matter experts. The traffic data outputs described above will be reviewed by each specialist assessment team and implications considered and confirmed. At this stage, however, it is anticipated that likely changes would not result in material changes to the overall assessment of significant effects in the ES. If confirmed, a qualitative commentary on the implications for the relevant environmental assessments can be provided in the reporting task below



prepared within the programme described here. The potential implications of this review and new guidance on each of those aspects is summarised as:

- Noise The traffic data used for noise modelling is the annual average weekday traffic (AAWT). The assessment of significant effects due to road traffic noise considers absolute noise levels in the Do Something scenario, as well as the change in noise levels between the Do Minimum and Do Something scenarios. Substantial changes in road traffic noise levels require a relatively large relative changes in traffic volume, for example, an increase in road traffic volume of approximately 25% is required to result in an increase in noise of 1dB (all else being equal). As the potential relative changes in road traffic volume when considering the new guidance are anticipated to be substantially less than this, it is expected that there would be no new or materially different significant effects than those reported in the ES.
- Air quality The traffic data used for the air quality dispersion modelling is annual average daily traffic (AADT) for each link within the affected road network (ARN) (defined in the ES). The Covid-19 impacts may affect the traffic at a link level. However, criteria in relevant guidance can be used to determine if the link level AADT changes, as a result of accounting for Covid-19, can be considered insignificant, without requiring detailed dispersion modelling. It is likely that accounting for Covid-19 will reduce the AADT of non-airport related traffic, which would result in exposure to lower total concentrations of pollutants. Therefore, the assessment in the ES assesses a more conservative scenario. Due to the significance criteria methodology used (as described in the ES), the possible effect to the assessment of significance is that conclusions will remain unchanged, or the effects will be less than those reported in the ES. This will be as a result of reducing total pollutant concentrations. Therefore, it is unlikely that new traffic data accounting for Covid-19 will significantly change the conclusions reported in the ES.
- Traffic and Transport Traffic flow data extracted from traffic modelling is used to
 determine the likely significant environmental effects across a range of traffic and
 transport criteria. It is not considered likely that the change in traffic levels as a result
 of the change in growth assumptions from COVID-19 will change the outcomes
 reported in the ES or the level of mitigation proposed.
- Greenhouse Gasses (GHG) The traffic data used in the GHG assessment only
 considers airport related traffic for Do Minimum and Do Something scenarios, rather
 than the wider background traffic that will be affected by Covid-19 impacts. There
 could be some minor changes in distance travelled due to rerouting of airport related
 traffic, as a result of reduced non-airport related demand elsewhere on the road
 network, however, from evidence to date the variance between model runs has
 always been negligible.



- Health With regards to the air quality related health impacts, similar to the air quality implication, it is likely that accounting for Covid-19 will reduce the AADT of non-airport related traffic, which would result in the population being exposed to lower total concentrations of pollutants than those reported in the ES. Therefore, the assessment in the ES assesses a more conservative scenario. The possible effect to the conclusions will remain unchanged, or the effects will be less than those reported in the ES, as a result of air quality.
- Biodiversity With regards to the air quality related impacts on ecological receptors, similar to the air quality implication, it is likely that accounting for Covid-19 will reduce the AADT of non-airport related traffic, which would result in exposure to lower total concentrations of relevant pollutants. Therefore, the assessment in the ES assesses a more conservative scenario. The possible effect to the conclusions will remain unchanged, or the effects will be less than those reported in the ES, as a result of air quality.

Task 20: Reporting. The outcome of the accounting for COVID-19 in transport modelling work will be documented in a standalone report.

Task 21: Stakeholder Meetings 4 – Reporting. The key findings will be presented and discussed with the stakeholders.

Task 22: Submission to Planning Inspectorate. A final report will be issued to the Planning Inspectorate.

It is possible that should Tasks 14 and 15 conclude the forecasting risks to be small and there is no need to make adjustments, Task 16 may not then be required, and the programme may then be shortened.

Task Activity													Week Bo	eginning												
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26
	12/06/202	3 19/06/2023	26/06/2023	03/07/2023	10/07/2023	17/07/2023	24/07/2023	31/07/2023	07/08/2023 14	4/08/2023	21/08/2023	28/08/2023	04/09/2023	11/09/2023	18/09/2023	25/09/2023	02/10/2023	09/10/2023	16/10/2023	23/10/2023	30/10/2023	06/11/2023	13/11/2023	20/11/2023	7/11/2023	04/12/20
0 Scoping and Responding to 13 June 2023 Letter																										
1 Stakeholder Meetings 1 - Scope																										
2 Collate available 2016 to 2023 SRN traffic count data (on-line)																										
3 Request 2016 to 2023 LRN traffic count data from LHAs																										
4 Review of DfT Rail COVID-19 Scenarios																										
5 Analyse traffic count and patronage data to determine trends since 2016																										
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13 Determine future year risks and need (if any) for adjustment factors																										
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