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Mr S Berkeley
c/o Louise St John Howe
Programme Officer,
PO Services
PO Box 10965,
Sudbury,
Suffolk CO10 3BF

Hitchin,
Herts
SG5 1UN
26th February 2018

Re; North Hertfordshire Local Plan - Air Quality Hearing Statements

Dear Mr Berkeley,

Hitchin Forum, of which I am Chairman, has drawn attention to the impact of proposed developments at Luton airport in letters which appear in appendices to this letter. Unfortunately, the Forum is unable to make any representation to your Examination as its original submission, prepared with other community groups in 2016, was under the umbrella of the Hitchin Town Action Group. I made an individual submission at that stage, and am therefore able to make a submission.

Following the statement made by Mr Couper at the Examination session on 23rd January, regarding the Sustainability Assessment that CAG produced for NHDC, in which he admitted that ‘...we missed potential cumulative effects of developments ... on Air Quality Management Areas in Hitchin’, I am concerned that NHDC’s Local Plan does not fully take into account the impact of significant developments beyond its borders on Hitchin’s Air Quality Management Areas.

Mr Couper appeared to limit his comments to the impact from residential developments within north Hertfordshire. The developments proposed by Luton airport have the potential to significantly increase traffic on the A505/A602 corridor, which includes both of Hitchin’s AQMAs.

The first of these developments was announced approximately a year ago – that is the intention by London Luton Airport Limited (LLAL) to develop New Century Park as a business park. Hitchin Forum took part in the consultation process about this when it was first announced. A Planning Application for the development was submitted to Luton Borough Council (17/02300/EIA) in December 2017. In April 2017, the Forum’s response to the consultation process was to point out that a consequence of the development would be to significantly increase traffic along the A602/A505 corridor through Hitchin’s AQMAs. We calculated approximate figures for the peak time increases, based on the Airport’s 2012 Transport Assessment¹, submitted to support its then Planning Application for developments to facilitate an increase in passenger numbers to 18million passengers per annum (mppa). In April last year, that assessment was the best information we had. Our calculations were based on estimates of jobs generated by the development (4000, and

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7000) published at various times by LLAL and the likely proportion of the employees who would commute along the corridor. These projections have since been reduced - information in the Planning Application shows that the projected job total is now 3200.

The Forum's letter (which includes details of the calculations in its appendix) is appendix A in this document. The Transport Assessment is no longer available on the airport website, but I can supply a copy on request. These documents were copied to David Carr at NHDC. In August, in response to the publication of NHDC's new draft Air Quality Action Plan, Hitchin Forum sent a further letter to David Carr outlining similar concerns – appendix B. That letter refers to the same Transport Assessment mentioned in the earlier letter.

In December last year, London Luton Airport Operations Ltd (LLAOL) in its **London Luton Airport Vision for Sustainable Growth 2020-2050**² announced its intention to increase passenger numbers to 38mppa by 2050. Assuming similar patterns of journeys to and from the airport, and without significant mitigation involving considerable collaborative working between LBC, LLAL, LLAOL, NHDC and HCC, this would result in an even more serious impact on Hitchin's AQMAs before 2031. Crucially, this announcement was made after NHDC's Transport Strategy³ was produced in October 2017. Not surprisingly, that Strategy fails to take it into account.

In conclusion, I believe that NHDC's SLP does not include policies that are sufficiently robust to 'sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas' in the face of pressures from these two developments. It is essential that NHDC's Local Plan includes a policy to ensure that robust mitigation measures are in place.

Two aspects to such a policy are essential. The first is that there must be a commitment to seeking a strong partnership involving all 3 of the LPAs and the two arms of the airport operation to address ground access issues. The second is that this partnership must have a clear stated commitment to reduce the number of private car journeys through the A602/A505 corridor by employees and customers, particularly by the use of public transport or by restrictions on the use of more polluting vehicles.

Yours sincerely,

Bill Sellicks

References

1. London's Local Airport Planning Application Transport Assessment', prepared by URS Infrastructure and Environment Limited for LLAOL in November 2012 – not currently available on airport internet site - we can supply a copy on request.
2. London Luton Airport Vision for Sustainable Growth 2020-2050
<https://www.llal.org.uk/Documents/vision2020-2050.pdf>
3. Transport Strategy North Hertfordshire District Council, October 2017
<https://www.north-herts.gov.uk/sites/northherts-cms/files/ED14%20NHDC%20Transport%20Strategy%20October%202017..pdf>

Appendix A

Hitchin Forum consultation response to Luton airport's agent GL Hearn.

GL Hearn,
280 High Holborn,
London
WC1V 7EE

7 Bearton Green,
Hitchin,
Herts
SG5 1UN
14th April 2017

Re LLAOL proposals for the development of New Century Park

Dear Sir,

Hitchin Forum wishes to express concern over the impact of the proposed development on congestion and air quality in Hitchin.

If 4000 new jobs are created as a result of the development, we estimate that peak time vehicle movements on the A505 west of Hitchin will be **increased by up to 20%** as a result of the proposed development. That figure rises to about 35% if the most recently published job projection of 7200 is achieved.

Our estimate is based on figures which appear in '**London's Local Airport Planning Application Transport Assessment**', prepared by URS Infrastructure and Environment Limited for LLAOL in November 2012, in advance of the planning submission for changes to increase the capacity of the airport. The appendix to this letter gives details of our calculation and the paragraph numbers from that Assessment which give the data on which it is based.

The Assessment dismissed the impact of increased vehicle movements on the A505 west of Hitchin due to increased passenger numbers as minimal. It argued that increases would be concentrated between 4 and 6 am and would therefore not impact on morning peak figures (para 14.7.7). In the case of the afternoon peak, the argument was that 'The contact with additional passenger traffic could be further diluted given that once beyond the Luton Boundary other routes are available away from the strategic road network that some drivers may choose for their journey.' (Para 14.7.9)

There was, therefore, no recommendation of any measures to mitigate any effect on Hitchin's roads.

Given the likely use of the units in the proposed development, we believe that the effect in Hitchin of staff commuting to and from the NCP development is more likely to be felt at peak times.

Staff likely to commute from Stevenage, Cambridge or Peterborough will mainly use the A602 Stevenage Road / Parkway / A505 west Hitchin route. Increases in peak time traffic of the proportion we suggest will add to congestion and emissions in the two Air Quality Management Areas in Hitchin. The AQMA in Stevenage Road was declared in 2013, due to levels of NO₂ above the annual mean Air Quality Objective (AQO) of 40µg/m³. Subsequent figures have shown no improvement. Since then, annual mean levels of NO₂ above the AQO led to a further AQMA being declared close to the A505 / A602 junction on Hitchin Parkway in 2016. These local changes have occurred in the national context of the increasing understanding of the impact of NO₂ and particulates on health. A 20% increase in vehicle movements by the time the development is occupied will mean that there will be little prospect that NO₂ levels will improve in the foreseeable future within the existing AQMAs. It could easily mean that NO₂ levels would increase above the AQO elsewhere along the route. A 35% increase would of course cause even greater problems.

LLAOL should accept its responsibility towards the wider environment as well as its impact upon its immediate neighbours. We therefore urge that LLAOL, LBC, NHDC and HCC work together to investigate innovative and sustainable ways to mitigate the effect of the New Century Park development along this route.

Yours sincerely,

Bill Sellicks (Chairman, Hitchin Forum)

Appendix

Estimation of increase in vehicle movements along A602 / A505 corridor

Data source

All figures are taken from **London's Local Airport Planning Application Transport Assessment**, URS Infrastructure and Environment Limited for LLAOL. November 2012

Assumptions from data supplied

- Total jobs at NCP 'up to 4000' at NCP - this figure has rapidly been revised upwards, starting at 3000 in February, rising to 4000 in March at the exhibitions, and now 7200 in the information on the website at <http://www.llal.org.uk/LLAL-NCP.html>
- Staff commuting patterns as for airport in 2010 – i.e. staff commuting from Stevenage, Cambridge and Peterborough make up 12.6% of the staff total at the airport (**para 9.8.3 table 49**)
- Vehicle occupancy - 66% of journeys were undertaken by drivers driving alone (**para 9.8.1, table 48**)
- Most roles at NCP likely to be 'normal' office hours, so commuting time will be at 'normal' peak times¹

Hence

- If 4000 jobs are created, approximately 500 staff are likely to use the A602/A505 route, 330 of which will drive as sole occupants of their vehicles – allowing for car sharing, **estimated 400 extra journeys each way**

Estimate of vehicle movements for A505 west of Hitchin (**para 14.7.9**)

- AM peak period 2054
- PM peak period 1879

Conclusion

The potential impact of 400 extra peak time journeys could therefore be an increase of just under 20% in the morning period, and slightly higher in the afternoon period.

If 7200 jobs are created, the number of extra journeys would be 720 giving peak time increases of approximately 35%.

Note.

1. In this context, the peak periods were not clearly defined within the report, but would appear to be 7.00-9.00am and 4.00-6.00pm.

Appendix B (Consultation response re NHDC's draft AQAP to David Carr)

David Carr
Environmental Protection Officer
North Hertfordshire District Council
Town Lodge
Gernon Road
Letchworth Garden City
SG6 3HN

7 Bearton Green,
Hitchin
SG5 1UN

17th July 2017

Dear Mr Carr,

Hitchin Forum is grateful for the opportunity to comment on the draft AQAP for Stevenage Road and Paynes Park AQMAs, Hitchin.

Although the lack of commitment to address air quality issues by central government limits effective options, we consider that these proposals could be more ambitious, especially in attempting to reduce the use of cars for short journeys within Hitchin. Some measures are insufficiently well-defined in terms of outcomes, especially in terms of the promotion of cycling and walking.

We suggest consideration of the following

- measures to incentivise car-pooling for those working in the town centre, for instance reserved and / or dedicated reduced price car parking spaces in the Lairage car park.
- work with HCC to widen the north Hitchin 20mph zone to make cycling safer throughout the town
- work with HCC to incentivise walking and cycling to school
- definition of a performance indicator and target date for measure 4 on the promotion of cycling and walking
- work with HCC to re-introduce Stevenage Road and B656 crossing proposals with public consultation to encourage 'buy-in' to the idea of facilitating walking and cycling prior to the production of specific proposals
- a greater number of EV charging points than envisaged, especially in the Lairage car park
- appointment of a local 'Green Champion' to work with employers, schools and other bodies to address air quality by publicising initiatives, educating drivers and encouraging and incentivising uptake of sustainable modes of transport

We welcome the intention to '... continue to work with regional and central government on policies and issues beyond North Hertfordshire's direct influence'. However, we are concerned that the proposed development at New Century Park in Luton has not been taken into account. The development will significantly increase traffic along the A602 / A505 corridor – we estimate by up to 35% in the worst case - please see details of our calculations appended. This ignores the effect of the additional traffic which will result from the increase in passenger numbers at the airport to 18mppa. If our estimates are correct, the AQAP should include a commitment to work with Luton Borough Council to mitigate the effect of both developments.

Yours sincerely,

Bill Sellicks (Chairman)

Please note – the appendix to this letter was identical to that for the letter to G L Hearn