LUTON BOROUGH COUNCIL LOCAL PLAN 2011-2031
INDEPENDENT EXAMINATION – STAGE 3 HEARING
WRITTEN REPRESENTATION REGARDING MATTERS 19, 21, 25 AND 26
LONDON LUTON AIRPORT OPERATIONS LIMITED
NOVEMBER 2016

Issue / revision | Final
Reference | 158607S/1
This document is issued for
[ ] Information | [ ] Approval
[ ] Comment | [ x ] Submission

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1.0 Introduction

1.1 This written statement is submitted on behalf of London Luton Airport Operations Limited (LLAOL) and addresses points raised within matters 19, 21, 25 and 26 of the Luton Borough Council Local Plan 2011-2031 (Local Plan) stage 3 hearing.

1.2 London Luton Airport plays a significant role in the national and regional economy, and is the largest centre of employment in Luton. Section 5 of this written statement summarises the significant existing and predicted future economic impact of the airport. Along with the M1 and local railway connections, the airport provides accessibility for people and businesses alike. This accessibility improves business performance and helps to create jobs across all sectors.

1.3 The strategic significance of the airport is further reflected in the confirmation of the Luton Airport Enterprise Zone (25 November 2015), which covers around 395 acres and consists of three linked sites surrounding the airport.

1.4 Furthermore, the Aviation Policy Framework was published in March 2013 and sets out the government’s objectives for aviation. Paragraphs 1.1–1.3 state:

“The UK has always been an outward-looking nation – an island economy that for centuries has owed its prosperity to the transport and trade routes linking it with the rest of the world. With the increasing globalisation of our economy and society, the future of the UK will undoubtedly continue to be shaped by the effectiveness of its international transport networks.

We believe that aviation infrastructure plays an important role in contributing to economic growth through the connectivity it helps deliver. For example, it provides better access to markets, enhances communications and business interactions, facilitates trade and investment and improves business efficiency through time savings, reduced costs and improved reliability for business travellers and air freight operations.

There is broad agreement that aviation benefits the UK economy, both at a national and a regional level. While views differ on the exact value of this benefit, depending on the assumptions and definitions used, responses to both the scoping document and the consultation demonstrated that the economic benefits are significant, particularly those benefits resulting from the connectivity provided by aviation. In addition we believe there to be social and cultural benefits from aviation…”

1.5 In this context, it is essential that the strategic importance of London Luton Airport is appropriately reflected within the Local Plan for it to be considered sound. LLAOL submitted representations to the previous Regulation 18 and 19 consultations dated 14 August 2014 and 7 December 2015 respectively, as well as a written statement as part of the stage 2 hearing process, which took place during September 2016. Specifically, the stage 2 written statement responded to matters 2, 3, 4, 11 and 14.

1.6 Within the previous submissions LLAOL outlined the significant importance of the airport and its continued growth to Luton, the wider sub-region and national economy. This was done within the context of ongoing concerns, both from a
strategic and policy-related position, whereby the plan in its current form has the potential to restrict the future sustainable growth of the airport beyond its permitted levels (equating to 18 million passengers per annum (mppa)). It is also important to highlight that the current permitted growth and airport master plan will be delivered before the expiry of the proposed Local Plan period. The plan and its policies therefore need to provide for the airport’s continued sustainable growth beyond that currently permitted.

1.7 In general LLAOL wishes to outline its support of the emerging plan, and appreciates that a number of the concerns raised previously have been reflected in revised drafts. However, LLAOL believes that some issues remain regarding certain policies, which continue to have the potential to restrict the future sustainable growth of the airport to the significant detriment of the local, regional and national economy, not to mention the potential social and environmental benefits that sustainable airport expansion could deliver. To that end, we respond to the questions raised by the Planning Inspector in respect of matters 19, 21, 25 and 26.

Test of soundness

1.8 As the plan is in the final stage of its independent assessment, it is important to assess the policies against the tests of soundness established within paragraph 182 of the National Planning Policy Framework (NPPF) which states that:

“A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

1.9 To that end, in response to the matters and questions raised by the independent Inspector, LLAOL will take into account these tests of soundness.
2.0  Matter 19 – Presumption in favour of sustainable development (policy LP1)

Question 1: Is it the intention of LP1A that planning permission will only be granted where applications contribute to economic, social and environmental objectives? If so, is that justified?

2.1  We believe that the intention of draft policy LP1 is clear. LLAOL believes that it is necessary for the Local Plan to include such a policy that aligns with the fundamental principle of the NPPF. With regard to the three dimensions of sustainable development, paragraphs 151 and 152 of the NPPF are clear, as they state:

"Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.

Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impacts should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate."

2.2  It is apparent from these paragraphs that development proposals do not necessarily need to deliver all three strands of sustainable development in order for them to be considered acceptable. LLAOL believes that this is adequately reflected within policy LP1 section A. The wording states that the council will require development proposals to demonstrate positive contributions towards the economic, social and environmental objectives of sustainable development ‘unless material considerations indicate otherwise’. We believe that this form of wording provides the caveat to allow for development to come forward that does not contribute to all three dimensions of sustainable development.

2.3  LLAOL concludes that the intention of policy LP1 A is not to only grant planning permission where all the dimensions of sustainable development are met, and that this section of the policy is justified and sound.

Question 3: Is it reasonable to require that all development proposals will meet all criteria C to L? Or should it be ‘where applicable/appropriate to the particular proposal’? (Council’s proposed MOD6)

2.4  We believe the current wording of criteria C to L has the potential to restrict and prevent sustainable development coming forward within Luton borough over the lifetime of the plan. As such we consider that this section of policy LP1 is not sound, when tested against NPPF paragraph 182.

2.5  However, we note the council’s proposed modification (MOD6), which seeks to include ‘where applicable / appropriate to the particular proposal’ to criteria C to L
of policy LP1. LLAOL fully supports this proposed modification as it will add clarity to the policy and ensure the policy does not become restrictive to development. LLAOL considers the addition of this minor modification will make the policy sound.

**Question 4: Do the various policy criteria provide a clear indication of how a decision maker should react to a development proposal? What is the relationship between the policy criteria here and the more detailed policies later in the plan covering the same matters?**

2.6 We believe that the council’s intention for policy criteria C to L is to set out its overarching requirements for sustainable development within Luton borough, whilst the more detailed policies set out the requirements for specific sites and detailed subject matters.

2.7 However, because the plan contains such detailed allocation and development management policies, notwithstanding our comments in paragraph 2.5 above, we do not believe criteria C to L of policy LP1 are necessary to make the policy sound, and would suggest that an equally sound policy covering the principles of sustainable development would simply include sections A and B.
3.0 Matter 21 – Green belt (policy LP4 B)

Main issue: Is Policy LP4B consistent with national policy and guidance?

3.1 In line with our stage 2 written statement, we do not believe that policy LP4 B is consistent with national policy and guidance. In summary our stage 2 written statement identified that an area of operational airport land, within LLAOL’s control, is designated as green belt and an area of great/local landscape value. This same area of land is also designated under draft policy LP6, and LLAOL considers this to be a conflict.

3.2 LLAOL considers that this area of land does not serve any of the green belt purposes established within NPPF paragraph 80. LLAOL does not believe it is a sound approach for this land to have such conflicting allocations within the Local Plan, and therefore respectfully requests that the green belt and landscape allocations are removed from this area.

3.3 LLAOL also does not believe it is sound for the Local Plan to seek to apply secondary purposes to the green belt within Luton borough, as set out within Local Plan paragraph 4.37, above those established through the NPPF. We therefore respectfully suggest that these secondary purposes be removed from the plan, in order for policy LP4 to be found sound.
4.0 Matter 25 – Transport, communications & climate change (policy LP32 and policy LP38)

Policy LP32 (Parking)

Question 2: The policy states that parking at London Luton Airport will be stringently controlled. Is the plan sufficiently clear about what ‘stringent control’ means and how does it relate to Policy LP6 which states that airport related car parking should be located within the Airport Strategic Allocation?

4.1 LLAOL is fully supportive of the wording of policy LP32, and the associated section of policy LP6, with respect to airport-related car parking.

4.2 The airport operates a Surface Access Strategy (appended to the stage 2 written statement), which looks to promote access and transport to and from the airport for staff and passengers by sustainable transport modes. This includes promoting greater rail and bus connectivity, with the aim that future sustainable growth of the airport will not lead to significant increases in unsustainable traffic levels.

4.3 Control of parking levels, specifically on speculative sites outside of the airport boundary, is a fundamental part of managing the level of car usage for travelling to and from the airport. The wording within policy LP32 is therefore critical to supporting the delivery of the Surface Access Strategy.

4.4 The reference within LP6C, that airport-related parking should be located within the strategic allocation, simply means that any proposed increases in parking will be able to be fully assessed and tested in line with the Local Plan policies, as well as the airport’s access strategy.

4.5 Speculative parking proposals outside of the allocation boundary, and airport’s control, which could then be used for airport-related purposes, would not be subject to such stringent control and would in turn affect the sustainable transport objectives of the airport.

Policy LP38 (pollution and contamination)

Question 1: The policy states that proposals will be expected to demonstrate that they do not have an adverse effect in relation to pollution of air, land and water from any source. Is the intention that any proposal, regardless of scale and nature, will be refused permission if there is any adverse effect? Is the policy sufficiently clear in terms of how it will be applied?

4.6 Paragraph 1 of policy LP38 states:

“Development proposals will be expected to demonstrate that they do not individually or cumulatively have an adverse impact on either neighbouring development, adjoining land or the wider environment. This policy applies to the pollution of air, land and water from any source. It specifically includes chemical, biological and radiological contamination and the effects of noise, vibration, light, heat, fluid leakage, dust, fumes, smoke, gaseous emissions, odour, explosion, litter and pests.”
4.7 We consider that the wording of this policy is unsound because it is significantly overly restrictive, and believe that it will prove extremely difficult for any development proposal to demonstrate compliance with this policy. The nature of development means that there are always likely to be instances where development will create some adverse impact, either individually or cumulatively.

4.8 If a development is likely to cause an adverse impact on an adjoining site or within the wider environment it is up to those submitting the application to demonstrate how they will mitigate the impact or, if the adverse impact cannot be mitigated, why it cannot be. An application should then justify the merits of development and how these outweigh other material considerations, such as impacts on neighbours and the wider environment.

4.9 To have such a restrictive policy is not a sound approach to adopt. We do not believe this policy is consistent with paragraphs 151 and 152 of the NPPF, which are quoted in full above in response to the questions covering matter 19. As a result, LLAOL does not believe the policy to be sound, and believes it will need to be amended prior to adoption by Luton Borough Council. We suggest the following policy wording to replace the current introductory section of the policy relating to pollution:

Where applicable, development proposals will fully assess their individual and cumulative impact on the pollution of air, land and water, on neighbouring development, adjoining land and wider environment. Where impacts are identified as significant, appropriate mitigation will need to be demonstrated. Where significant impacts cannot be mitigated, it will be necessary to demonstrate that the development benefits significantly outweigh any residual harm. This policy specifically covers chemical, biological and radiological contamination and the effects of noise, vibration, light, heat, fluid leakage, dust, fumes, smoke, gaseous emissions, odour, explosion, litter and pests.
5.0 Matter 26: Strategic allocations (policy LP6)

Luton Airport (LP6)

Question 1: Is the support for the growth and expansion of Luton Airport appropriate and justified, including as expressed in Strategic Objective 1 and Policy LP6?

5.1 Yes. LLAOL believes that it is fundamentally important for the Local Plan, covering the development needs of Luton over the period 2011 to 2031, to support the future potential for the sustainable growth and expansion of London Luton Airport. As we have already outlined within the stage 2 hearing written statement, the airport plays a substantial role in the local, regional and national economy.

5.2 The airport provides vital accessibility, which facilitates improvements to business performance and creates jobs across all sectors. The designation of the Luton Airport Enterprise Zone on 25 November 2015 further outlines the strategic significance of the airport.

5.3 Appended to LLAOL’s stage 2 statement was the 2015 Oxford Economics report on the economic impact of the airport. The significance of this report means that it is important to re-emphasise the key findings. The report found that in 2013, the airport’s economic activity contributed £1.3 billion to the UK Gross Domestic Product (GDP), with every £1 contributed by the airport creating another £2 within the wider economy.

5.4 It is estimated that the airport sustained 27,100 jobs during 2013 (9,400 direct jobs, 7,700 indirect jobs and 10,000 induced jobs as airport and supply chain employees spent their wages), with every direct job supported by the airport generating a further 1.9 jobs within the national economy. This level of employment meant that the airport contributed £740 million in gross wages, and produced tax receipts of £648 million for the Treasury.

5.5 In terms of the immediate local and sub regional impact, the report concludes that the airport supported a £732 million contribution to GDP and sustained 16,000 jobs within the Three Counties area (comprising Bedfordshire, Buckinghamshire and Hertfordshire) during 2013. Within Luton borough itself, £533 million was contributed to GDP and almost 12,000 jobs were sustained.

5.6 The airport is currently in the process of implementing planning consent 12/01400/FUL to expand to 18 mppa. The Oxford Economics report has forecast the future economic impact of this growth with the proposed infrastructure improvements also implemented.

5.7 It forecasts that the airport’s total GDP contribution in 2030 would be £2.3 billion, and it would support 37,700 jobs. Of these jobs, it is anticipated that the airport may need over 1,100 additional workers in the three highest-skilled occupational groups (including aeronautical engineers, pilots and flight engineers), and over 2,500 workers for lower skilled roles such as customer advisors and baggage handlers. Within the Three Counties sub region the GDP contribution is anticipated to reach £1.4 billion by 2030, supporting 22,600 jobs.
5.8 The Aviation Policy Framework is also explicitly clear on the important role aviation infrastructure plays in supporting the UK economy, and we draw specific attention to paragraphs 1.1 to 1.3 of the framework quoted in paragraph 1.4 of this report.

5.9 The airport is currently operating at 14 mppa and the current master plan period runs up to 2028. In comparison, the emerging Local Plan is proposed to run to 2031. There is clearly a disconnect between these two timeframes, and we do not consider it a sound approach for there to be a policy vacuum beyond the current approved growth strategy.

5.10 The NPPF is clear in its support for economic growth. Paragraphs 19 and 21 state that:

“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

…

Planning policies should recognise and seek to address potential barriers to investment…”

5.11 We therefore conclude that given the economic significance of the airport, and its importance to supporting economic growth over the plan period, combined with the fact that the proposed Local Plan period extends beyond the current approved growth, there is a clear need for planning policies to support any further sustainable expansion of the airport in accordance with bullet points 1 and 4 of NPPF paragraph 157.

Question 2: Are the criteria in B justified and effective? Is it necessary to only permit development where all 9 criteria have been met? It is clear from the policy what expansion and development means (ie what type of potential development proposals within the airport will criterion B. relate to?)

5.12 As outlined in the response to question 1 above, addressing policy LP6, there is a clear need to support the future sustainable growth of London Luton Airport over the plan period. In order to do this, LLAOL accepts that it is necessary for the local planning authority to set out clear criteria against which future proposals can be assessed in order to ensure any potential impacts and proposed mitigation are understood. LLAOL considers that this approach is sound as per paragraph 182 of the NPPF.

5.13 Whilst LLAOL does not object to any of the nine assessment criteria set out within part B of policy LP6, it considers that there is scope for airport-related development to come forward over the plan period which would not necessarily relate to all criteria, and therefore it would not be appropriate or possible in such instances to demonstrate policy compliance. In our view, the current wording of the policy, implying all criteria should be met for all development proposals, could be problematic when applied to the development management process.
5.14 In response to this, LLAOL respectfully suggests that the wording to the policy be amended slightly to include the caveat that the nine criteria apply to the determination of applications "where applicable/appropriate", as per the council’s proposed modification to policy LP1. This is outlined in the proposed amended wording to policy LP6 B set out below.

5.15 LLAOL considers that the use of the terms ‘expansion’ and ‘development’ will apply to any potential future proposals that seeks to expand the airport above that already approved and set out within the current airport master plan. LLAOL does not consider the terminology to pose any uncertainty.

5.16 In principle, LLAOL fully supports draft policy LP6, and its intention to provide a clear and strong policy framework against which future airport growth proposals would be assessed. However, as noted we retain some level of concern regarding the interpretation of the criteria established within section B, which has the potential to negatively impact upon the timely determination of future planning applications. In direct response to this, LLAOL therefore respectively propose the following wording to be applied (bold text indicates suggested amendments):

"Proposals for expansion of the airport and its operation, together with any associated surface access improvements will be assessed against the Local Plan policies as a whole. Proposals for development will be supported where the following criteria are met, where applicable / appropriate to the particular proposal:

i. they are directly related to airport use of development;

ii. they contribute to achieving national aviation policies;

iii. they relate to the latest planning permission and Airport Master Plan published by the airport operators and adopted by the Borough Council;

iv. they fully assess the impacts of any increase in Air Transport Movements on surrounding occupiers and/or local environment (in terms of noise, disturbance, air quality and climate change impacts), and identify appropriate forms of mitigations in the event significant adverse effects are identified;

v. achieve further noise reduction or no significant increase in day or night time noise, or otherwise cause additional excessive noise including ground noise at any time of the day or night in accordance with the latest Airport Noise Action Plan;

vi. include an effective noise control, monitoring and management scheme that ensures that current and future operations at the airport are fully in accordance with the policies of this Plan and any planning permission which has been granted;

vii. include proposals which will over time support in the achievement of a diminution and betterment of the effects of airport operations on the amenity of local residents and occupiers and users of sensitive premises in the area, through measures to be taken to secure fleet modernization or otherwise;

viii. incorporate sustainable transport and surface access measures which minimize use of the private car, maximize the use of sustainable transport modes and seek to meet modal shift targets, all in accordance with the latest London Luton Airport Surface Access Strategy;"
Question 3: Why is it necessary to require that expansion is in accordance with the latest planning permission and the Airport Master Plan (iii)? Is it appropriate for criterion v. to require proposals to accord with ‘any imposed planning condition’ (See Council proposed MOD16) Should the plan provide a starting point for the determination of any planning applications and the preparation of a master plan rather than vice versa?

5.17 LLAOL believes that the intention of LP6 B (iii) is to ensure that any sustainable growth to increase capacity at the airport in the future reflects a strategic vision, such as a master plan or comprehensive planning permission. This section of the policy is simply seeking to retain sufficient control of future proposals and to that end LLAOL fully supports the inclusion of criterion (iii) within policy LP6 in conjunction with the proposed modification to paragraph 4.45 of the plan (MOD16). We believe the proposed amended wording outlined above further clarifies the intention of criterion iii.

5.18 Whilst LLAOL does not have any specific concerns regarding the wording of criterion (v), it believes that the requirement to accord with the most recent Airport Noise Action Plan provides an appropriate level of control for the local planning authority. This is because the action plan will need to relate and respond to any imposed noise conditions, so the policy in its current form is effectively covering the same point twice – which is unnecessary. The proposed amended wording to criterion (v), outlined above therefore removes this. LLAOL however, wishes to outline that should the wording for criterion (v), remain as existing, it would have no strong objection to this.

Question 4: LP6C only permits airport related parking outside the strategic allocation where it can be demonstrated that there is a long-term need that cannot be met at the airport. Is this justified? Is the restriction on airport related parking at Century Park and Wigmore Valley Park justified?

5.19 Yes, the parking restrictions are justified and we fully support its inclusion within LP6 C.

5.20 As responded to under matter 25, the Airport Surface Access Strategy (2012-2017) sets out challenging targets, in respect to increasing the level of sustainable transport to and from the airport. In order to achieve these it is imperative that the airport has control over the offer of airport parking.

5.21 Currently there are a number of off-site car parks, which are not operated by LLAOL. Whilst these car parks provide a service to some airport passengers, they place additional pressure on London Luton Airport facilities and the surrounding road network, particularly as these operators are increasingly offering a premium ‘valet’ service, which involves returning the passenger’s car to them at the airport. Facilities such as these work against the access strategy, making it more difficult to reach the challenging targets that have been set which aim to increase the sustainability of the airport. We therefore wholly believe the parking restrictions outlined within LP6 C are justified, and LLAOL fully supports their inclusion.
Question 5: Is LP6 B v. sufficiently clear and effective? For example, what is meant by ‘excessive noise’?

5.22 Yes. LLAOL considers that ‘excessive noise’ would be considered and defined through the detailed technical studies that would be undertaken as part of any application for a development proposal. It is considered most appropriate for acoustic experts to determine what noise levels would be classified as ‘excessive’, as opposed to planning policy officers.

5.23 It is important that the planning system does not look to overly control the management of pollution control regimes, as per paragraph 122 of the NPPF. Therefore LLAOL believe the wording of the policy to be appropriate, and will allow for all manner of airport-related development proposals to be appropriately assessed in terms of potential noise impact over the duration of the plan period.

5.24 If LP6 B (v) were to specify exact noise parameters it is likely that the policy would become out of date and irrelevant before the end of the plan period, due to changes in noise control, aviation technology and legislation relating to pollution and nuisance.

Question 6: Has the effect of the allocation, including Century Park, on the character and appearance of the surrounding countryside/landscape (including the Chilterns AONB) and any heritage assets been adequately taken into account and will the policy criteria (eg LP6 F) help ensure any adverse effects are satisfactorily mitigated?

5.25 Yes. However, we believe that the local planning authority has taken an overly cautious approach in assessing the possible effects of the allocation on the surrounding countryside/landscape (including the Chilterns AONB) as well as any heritage assets. In LLAOL’s previous consultation submissions and statements, we have highlighted our view that the council has overly negatively scored policy LP6 within its Sustainability Appraisal. Countryside and landscape impacts are assessed within this, with the local planning authority concluding that the allocation would cause a minor negative impact. In comparison LLAOL believes this impact should be scored as neutral. We therefore believe that this assigned scoring represents a worst case scenario, which leads us to conclude that the character and appearance of the surrounding countryside and landscape has more than adequately been taken into account.

5.26 Overall, LLAOL fully supports the inclusion of LP6 F in order to continue to actively promote mitigation of any potential adverse landscape and/or heritage asset impact.

Question 7: Are the likely effects of the allocation, including Century Park on the strategic road network adequately understood and can any adverse effects be mitigated through the application of plan policies?

5.27 The likely effects on the strategic road network are well understood. Within the LP6 allocation there are multiple policies that will help to protect and mitigate any impacts on the strategic road network.
5.28 Relating to any future airport expansion, policy LP6 B (viii) requires the incorporation of further sustainable transport and surface access measures in accordance with the Airport Surface Access Strategy. This document aims to improve links to and from the airport in order to reduce dependence on car use, and will deliver social, economic and environmental benefits. The policy states that the airport must accord with this document. Therefore LLAOL considers that the local plan will mitigate any possible adverse impacts.

5.29 In addition, transport policies within LP6 C outline that walking and cycling facilities should link proposals within the allocation boundary. It also states that access to Century Park should be designed to provide an area solely for cyclists, pedestrians and public transport. This will again help to mitigate any possible adverse impacts on the strategic road network by reducing car use.

5.30 It is also important to highlight that any planning application relating to the allocated area under policy LP6 will need to assess the transport impacts of the proposed development and identify appropriate levels of mitigation, should the assessment demonstrate a significant impact on the road network as a result of the proposal.
6.0 Conclusions

6.1 London Luton Airport plays a vital role in the local, regional and national economy. There is clear potential for its continued sustainable growth over the plan period, and this should be fully supported by a proactive and pro-development Local Plan.

6.2 LLAOL is pleased that the plan is supportive of the airport, acknowledges its strategic significance and the need to support future sustainable growth. We believe that with the minor changes to policy wording suggested, the plan will pass the tests of soundness established within paragraph 182 of the NPPF.