

**From:** [REDACTED]  
**To:** ["developmentcontrol@luton.gov.uk"](mailto:developmentcontrol@luton.gov.uk)  
**Cc:** [Planning EE](#)  
**Subject:** Planning applications 16/01400/OUTEIA Power Court, Luton and 16/01401/OUTEIALand Adjacent Junction 10 to 10A M1, Newlands Road - Luton  
**Date:** 13 September 2016 09:04:30  
**Attachments:** [Scanned document.msg](#)

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For the attention of [REDACTED]

Dear [REDACTED]

Please find Highways England response to the above planning applications. Highways England has been in pre-application discussions with PBA the developers consultant to determine development traffic on M1 junction 10 and identify mitigation where applicable. Highways England require additional time to complete this work and recommend Luton Borough Council do not grant planning permission before 31 December 2016.

Regards

[REDACTED]

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

**Tel:** + [REDACTED]

**Web:** <http://www.highways.gov.uk>

**GTN:** [REDACTED]



## Developments Affecting Trunk Roads and Special Roads

### Highways England Planning Response (HEPR 16-01)

### Formal Recommendation to an Application for Planning Permission

From: Martin Fellows  
Operations (East)  
[planningee@highwaysengland.co.uk](mailto:planningee@highwaysengland.co.uk)

To: Luton Borough Council FOA – [REDACTED]

CC: [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: 16/01401/OUTEIA

Referring to the planning application referenced above, dated 9 September 2016, Outline planning permission with all matters reserved except for access, for mixed use development comprising: office floor space (use class B1), retail floorspace (use class A1), food and beverage – Land Adjacent Junction 10 to 10A, M1, Newlands Road, Luton, notice is hereby given that Highways England's formal recommendation is that we:

- ~~a) offer no objection;~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is / is not relevant to this application.<sup>1</sup>

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk).

<b>Signature:</b> [REDACTED]	<b>Date:</b> 13 September 2016
<b>Name:</b> [REDACTED]	<b>Position:</b> Assistant Asset Manager
<b>Highways England:</b> Woodlands, Manton Lane Bedford MK41 7LW	
[REDACTED]	

**Annex A**      **Highways England recommended further assessment required**

HIGHWAYS ENGLAND ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application 16/01401/OUTEIA and has been prepared by [REDACTED]

Highways England has been collaborating with the developer on pre-application discussions regarding development traffic impact on the Strategic Road Network, M1 junction 10. Highways England will require to review and assess the Transport Assessment supporting the application to determine if there is sufficient capacity for the junction to operate safely or identify mitigation required.

In order for this work to be completed Highways England recommend Luton Borough Council do not grant planning permission before 31 December 2016. Should this work be completed before Highways England will replace this recommendation with one seeking conditions where applicable that will apply in the event of the planning authority granting planning consent.

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Newlands Park development  
**Date:** 21 September 2016 15:35:42

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[REDACTED]  
[REDACTED] at Highways England has asked AECOM to undertake a review of the Transport Assessment associated with the Newlands Park development application and he has passed across your contact details. In order to complete the review fully we need to get hold of the M1 Junction 10 LinSig models and the (old) Junction 10a ARCADY models. Is this something you can send through to me?

Regards,

[REDACTED]  
[REDACTED]  
Senior Consultant, Transportation  
[REDACTED]  
[REDACTED]

**AECOM**

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Newlands Park TA Review  
**Date:** 25 October 2016 10:24:27  
**Attachments:** [TN\\_Newlands\\_Park\\_TA\\_Review\\_v8.docx](#)  
[TN\\_Newlands\\_Park\\_TA\\_Review\\_v8.pdf](#)

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[REDACTED]  
Following our conversation yesterday please find attached AECOM's review of the TA associated with Newlands Park in Luton. We have made a number of recommendations throughout the note so please let me know if you have any questions.

As requested yesterday I have also included a Word version of the document.

Regards,

[REDACTED]  
[REDACTED]  
Senior Consultant, Transportation

[REDACTED]  
[REDACTED]

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Project: **Highways England Spatial Planning Arrangement** Job No: **60506522 DL005.004**

Subject: **Newlands Park (M1 J10) Transport Assessment Review**

Prepared by: [Redacted] Date: 14<sup>th</sup> October 2016

Checked by: [Redacted] Date: 19<sup>th</sup> October 2016

Verified and Approved by: [Redacted] Date: 24<sup>th</sup> October 2016

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## 1 Introduction

- 1.1.1 Peter Brett Associates LLP (PBA) have been commissioned by the Newlands Park developers, 2020 Developments, to provide transportation advice in support of proposals for a mixed use scheme near M1 Junction 10 adjacent to the M1 and A1081 Airport Way.
- 1.1.2 This Technical Note (TN) has been prepared by AECOM, on behalf of Highways England (HE), in response to a Transport Assessment (TA) prepared by PBA relating to Newlands Park. The TA is dated August 2016 and Referenced 32444, Rev 2. The TA has been prepared in support of a planning application made to Luton Borough Council Reference 16/01401/OUTEIA. PBA previously partially detailed their proposed approach for the TA, which AECOM reviewed within a number of TNs, dated March, June and July 2016.
- 1.1.3 The purpose of this TN is to confirm whether or not the previous aspects of AECOM's responses have been addressed and to conduct a full review of the relevant sections of the TA and associated documents to determine whether the TA reasonably assesses the potential impact of the proposed development on the strategic road network (SRN). This includes a review of trip generation, distribution and assignment, as well as junction capacity assessments for the M1 J10 gyratory and A1081/London Road roundabouts.
- 1.1.4 HE are responsible for the monitoring, management and maintenance of the strategic road network (SRN). M1 Junction 10 is located approximately 250m away from the proposed development site and the site's potential impact on the junction will be the primary focus of this TN.
- 1.1.5 The proposed land use mix for the site as listed within the TA is shown in Table 1 below. It should be noted that the proposed development quantum is not listed within the application form. It is recommended that checks be undertaken to confirm that the TA is representative of the actual development proposed before considering whether it is appropriate for planning permission to be granted.

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**Table 1: Final estimated development land use mix.**

Land Use	Final estimated size (sqm)
Office	42,000
Retail	37,300
Leisure	16,000
Food and Drink	8,500
Hotel	350 beds

## 2 Existing Conditions – Accident Data

### 2.1 PBA Findings

- 2.1.1 The TA makes reference to existing accident data at M1 Junction 10. It is stated that the most recent data was not available and therefore high level accident data has been sourced from the website ‘[crashmap.co.uk](http://crashmap.co.uk)’. It is recommended that if the most recent detailed data becomes available then this is analysed.
- 2.1.2 Appendix C of the TA includes the high level accident data, although the full details of these accidents are missing from the document provided. However, the information provided suggests that the M1 Junction 10 gyratory has experienced a significant number of slight accidents over the last few years (the time period over which the data was collected is unclear. The M1 mainline has experienced a number of slight and serious accidents.

## 3 Trip Generation Methodology

### 3.1 Introduction

- 3.1.1 This section of the report will review PBA’s approach to the trip generation methodology and confirm whether AECOM’s previous recommendations made within earlier technical notes have been taken into account and addressed.
- 3.1.2 PBA state that TRICS (7.3.1) was used to establish person and multi modal trip generation for weekday and weekends. TRICS outputs are included in the appendices. Whilst AECOM had previously reviewed the trip generation methodology proposed by PBA and broadly agreed with the approach applied for the various land uses, there were still some outstanding concerns raised. How these have been addressed will be considered below, to determine whether the trip generation outlined within the TA is considered reasonable.

### 3.2 Office

- 3.2.1 PBA obtained office person trip rates for the weekday peaks from TRICS.
- 3.2.2 When checked AECOM found some small differences in the TRICS output for offices between the TA trip rates and those calculated by AECOM using TRICS. However, the TA trip rates are broadly similar and are considered robust when compared with the AECOM rates. Therefore the TA person trip rates are considered to be acceptable.



## 3.3 Hotel

- 3.3.1 PBA has obtained hotel person trip rates for the weekday peaks directly from TRICS, using hotel sites not close to commercial airports. This was justified due to airport hotels having an earlier AM Peak period compared to the normal network peak and was previously agreed with AECOM.
- 3.3.2 PBA stated that they were unable to obtain survey data for hotels near LLA. Instead, a passenger check-in and exit time profile of the airport was provided from a previous TA produced in November 2012. This indicated that the number of airport departures is significantly higher earlier in the AM peak than in the traditional network AM peak. Therefore, AECOM considered that making use of the weekday and weekend TRICS outputs from hotels not located near an airport, where the highest rates in the AM peak are between 08:00 and 09:00, to be robust. AECOM have therefore accepted this methodology and consider their person trip outputs from TRICS to be reasonable.

## 3.4 Leisure

- 3.4.1 PBA stated that person trip rates for the weekday and weekend peaks were obtained directly from TRICS, for each separate subcategory (gym, cinema, general leisure, and bowling). AECOM consider that this approach is reasonable and accept the trips generated.

## 3.5 Retail

- 3.5.1 PBA previously stated that due to the limited number of TRICS weekday retail surveys, previous experience was used to determine a weekday: weekend retail ratio, in order to calculate weekday trip rates based on those from the weekend. AECOM previously agreed the sites used within TRICS were comparable with the proposed development, however there were concerns regarding PBA's methodology. PBA indicate that the methodology was based on previous experience, however no evidence to support this experience has been provided. It is recommended that this evidence is provided to determine whether the approach taken by PBA is reasonable.
- 3.5.2 PBA previously proposed a trendline approach in order to calculate the weekend retail trip rates due to no appropriate Retail Parks similar to the proposed development being available in TRICS. AECOM understood this method had been employed to justify use of a lower trip rate per 100 sqm GFA than that given by an average of sites within TRICS.
- 3.5.3 Within AECOM's previous review (TN\_Land at M1 J10\_Trip Rates Revision\_issued) it was stated that whilst:
 

*'utilising a trendline may be a reasonable methodology to adopt, the trendline produced was an extrapolation (not an interpolation) and well outside of the values used, with a high risk that this extrapolation could be incorrect. The resultant equivalent vehicle trip rates were significantly lower than the trip rates recorded for any sites included within TRICS. There is therefore a risk that actual vehicle trip numbers could be significantly higher than calculated within the TA. The implications with respect to the operation of the Strategic Road Network (SRN) of a potentially significantly higher trip numbers should be understood.'*
- 3.5.4 AECOM therefore recommended that a comparison was undertaken of the resultant vehicle trip numbers and those that would be derived directly utilising vehicle trip rates available from TRICS based on recorded information, rather than extrapolated trip rates. In the event of significant differences being identified, consideration should have been given to the presentation of sensitivity tests which assess the impact to the operation of the SRN should these higher trip numbers occur.
- 3.5.5 These sensitivity tests have not been undertaken by PBA; therefore AECOM still questions this methodology. AECOM recommend that these sensitivity tests are undertaken by PBA in order to

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assess the potential impact of the retail development on the SRN should the higher trip numbers occur.

## 3.6 Food & Beverage

3.6.1 PBA stated that the Food and Beverage (F&B) trips, weekday and weekend, were taken directly from TRICS. AECOM previously indicated that there were likely to be no issues with the use of these trip rates and AECOM can confirm that the trip rates are considered reasonable.

## 3.7 Trip adjustments

3.7.1 PBA indicated that calculations have been undertaken to take into account trips that may be linked with other on-site uses. The TA indicated that 5% of trips to food and beverage were there solely for the purpose of eating and therefore that 95% of food and beverage trips were linked with other uses on the site. Furthermore, a 20% reduction has been applied to leisure trips as PBA consider that only 80% of leisure trips will use the site for leisure purposes alone. AECOM previously agreed with this approach within their latest review of the trip rates scoping information.

3.7.2 No further trip adjustments have been made with respect to the internalisation of other uses on the site, which AECOM consider to be a reasonable approach.

# 4 Mode Share

## 4.1 Introduction

4.1.1 In order to convert the person trip generation to vehicle trip generation the mode share for each land use was determine by PBA through a combination of TRICS and 2011 Census data. AECOM will review the methodology used for each land use in the sections below.

## 4.2 Office

4.2.1 PBA has used Census JTW car driver mode share data for the weekdays, with no trips at the weekend. AECOM previously raised concerns about the MSOA that was used to establish the car driver mode share and that it represented a more 'town centre' location than the proposed development site and that pedestrian and cycling trips may be more prevalent within the assessed MSOA than may be generated by the proposed development. However, AECOM has undertaken an assessment of similar sites within TRICS, as well as an alternative, potentially more representative MSOA, and consider that the car driver mode share used within the TA is reasonable.

## 4.3 Hotel

4.3.1 AECOM had previously raised some concerns regarding the mode share used for the hotel land use proposed for the site. PBA had established the weekday mode share directly from TRICS, and the weekend trips from the AM peak hour TRICs data. AECOM were concerned that the car driver mode share was too low for a site located on the edge of a town centre and near to a strategic road network junction. However, AECOM consider that a car driver mode share of between 75% and 80%, as outlined within the TA, is reasonable.

## 4.4 Leisure

- 4.4.1 As part of the scoping review, AECOM previously confirmed that the Leisure mode shares proposed for use within the TA were reasonable. AECOM can confirm that those used within the TA are consistent with those agreed previously.

## 4.5 Food & Beverage

- 4.5.1 PBA stated that the food and beverage mode shares, weekday and weekend, were taken directly from TRICS. AECOM consider this to be a reasonable.

## 4.6 Retail

- 4.6.1 The modal split for the retail land use was taken directly from weekend TRICS data for both the weekday and weekend modal split, due to a lack of suitable weekday retail sites available within TRICS. This approach is considered to be reasonable.

- 4.6.2 It should be noted that within the trip generation calculations in the TA it appears that the retail trip rates for the PM Peak have been multiplied by the AM Peak mode share instead of the PM peak mode share, which results in the TA significantly underestimating the total number of PM peak retail trips.

## 4.7 Vehicular Trip Types

- 4.7.1 PBA indicate that not all traffic anticipated to use a mixed use development of the scale proposed will be 'new' trips to the locality. PBA has therefore taken into account the potential for 'pass-by' and 'diverted' trips associated with the various land uses at the proposed development. AECOM agree with this approach in principle.

- 4.7.2 PBA has presented evidence from TRICS Research Report 95/2, which provides details of the percentage of pass-by and diverted trips associated with food superstores. These percentages are for food retail and PBA indicate that they are a good proxy for the proposed retail development. However, AECOM question the basis for this conclusion as there may be potential for food retail to experience a higher proportion of pass-by trips than non-food retail. Evidence to suggest that food and non-food retail pass-by proportions are similar has not been provided by PBA and it is recommended that this evidence is supplied to support the use of pass-by/diverted/transferred trips.

- 4.7.3 The TA indicates that to take account of pass-by and diverted trips, 27%, 38% and 21% of the weekday AM, weekday PM and Saturday peak retail trips respectively have been removed from the network. In addition to the concern raised above AECOM do not consider that all diverted trips should be removed from the network as some diverted/transferred trips can follow a different route to the existing trip on the network and could be new to this part of the network. AECOM recommend that the potential impact of diverted/transferred trips on the network is considered in more detail within the TA.

## 4.8 Travel Plan – Modal Shift

- 4.8.1 Section 8.1.2 of the TA indicates that a 5% shift from car to sustainable based office trips has been taken into account as part of the impact assessment within this chapter. DfT Circular 02/2013 indicates that the overall forecast demand that should be assessed within the junction capacity assessments should be comprised of *'existing flow plus traffic likely to be generated by development already committed, plus traffic likely to be generated by the development under consideration, less any reduction arising from any travel plan or demand management measures that are being proposed.'*

- 4.8.2 Based on the above extract from the DfT Circular 02/2013 AECOM consider that the 5% reduction in office trips in order to take into account an increase in sustainable measures as a result of the potential impact of travel plan measures is reasonable. It should be noted that it is important that the travel plan measures associated with the site should be sufficient to achieve this 5% reduction in car trips, otherwise the highway assessments may be underestimating the impact of the proposed development on the network.

## 5 Trip Distribution and Assignment

### 5.1 Office

- 5.1.1 PBA indicated within previous documents provided that a census-based gravity model as well as Census data, would be used to distribute office trips, although the methodology was not fully clear. The TA indicates that 2011 Census Journey to Work data has been used to determine the residential locations of the people who could work at the proposed development. AECOM consider that this approach is reasonable.
- 5.1.2 Following checks on the 2011 Census data AECOM broadly agreed with the distribution outlined within the TA, although AECOM consider that there is likely to be a slightly higher proportion of trips using the SRN than predicted within the TA.

### 5.2 Hotel

- 5.2.1 AECOM previously agreed a weighting of 80% of hotel trips (60%/20% Motorway/Airport Way split) using the SRN. This weighting has been utilised within the TA, which AECOM therefore consider to be reasonable.

### 5.3 Retail

- 5.3.1 PBA created a Retail Gravity Model to distribute retail trips; this was based on population, travel time and knowledge of existing retail outlets.
- 5.3.2 Luton Borough Council's Retail Study Update Report (July 2015) has been used to determine where other competing retail centres are located. A reduction factor was then applied to these competing zones (established through the Gravity Model). Whilst this approach seems broadly logical, it should be noted however, that it is not fully clear how these reduction factors were calculated. This reduction factor was then applied to the population and travel time of each trip origin zone (population \* travel time \* reduction factor) to establish the distribution proportions from each of these zones. Whilst AECOM has been able to access the Retail Study outlined above, it is not clear how the reduction factor calculations have been derived. It is recommended that further details of how these reduction factors have been calculated, and the evidence used within this process, should be provided.
- 5.3.3 The result of the retail distribution calculations demonstrates that 60% of trips are predicted to route via the SRN at M1 Junction 10. Whilst this seems like a relatively robust proportion, it is recommended that the evidence to support this proportion be provided.

### 5.4 Leisure and Food & Beverage

- 5.4.1 PBA used the retail mode share to distribute leisure and food and beverage trips, which AECOM considers to be reasonable.

## 6 Parking

### 6.1 Parking Accumulation

- 6.1.1 PBA have calculated the potential retail parking accumulation based on a 2-3 hour dwell time, which it is indicated is broadly consistent with other similar retail destinations elsewhere in the UK, supported by data provided within section 5.2.18 of the TA. AECOM generally agree with this approach.
- 6.1.2 The potential parking accumulation for the leisure use of the site has been based on trip rates from TRICS, which is considered reasonable. The proposed number of parking spaces for the retail, leisure and food and beverage land uses is 1,900. The parking accumulation for the three land uses on a Saturday (expected to be the greatest use of the site) is predicted within the TA to be approximately 1,500. PBA consider that this provides some leeway should the dwell time be longer than anticipated. AECOM consider that the site should have sufficient parking spaces for those making use of the retail, leisure and food and beverage land uses and that vehicles should not overspill onto the highway network.
- 6.1.3 PBA have calculated office parking provisions based on TRICS data, which AECOM consider to be a reasonable approach. The maximum parking accumulation is predicted to be 1,271 spaces, while the proposed number of spaces for office and hotel uses is 1,700. This leaves approximately 400 spaces for hotel use, which AECOM consider should be sufficient for a 350 bed hotel.
- 6.1.4 Within the previous reviews AECOM understood that the development car park could be used on Luton Town Football Club (LTFC) match days, as a park and ride facility and that the TA should consider what (if any) traffic generation implications this could have on M1 Junction 10. The TA does not indicate that a park and ride site will be provided on the site, however this should be confirmed by PBA.

## 7 Highway Impact Assessment

### 7.1 Scope of the Assessment

- 7.1.1 The TA outlines the scope of assessment proposed within section 8.2.2, including M1 Junction 10 and the A1081/London Road junction (formally M1 Junction 10a). Whilst AECOM agree that M1 Junction 10 will experience the greatest impact on the SRN as a result of the development, the high trip generation associated with the proposed development could result in a material impact to the SRN further afield than Junction 10. AECOM consider that a significant number of trips could route via M1 Junction 11 and that consideration should be given by PBA to assessing this junction.

### 7.2 Assessment Scenarios

- 7.2.1 PBA have provided details of the assessments peaks that are to be assessed within the TA. These have been previously agreed by AECOM. These are summarised below:
- Weekday AM Peak (07:30 – 08:30);
  - Weekday PM Peak (17:00 – 18:00); and

- Saturday Peak hour (13:00 – 14:00).

7.2.2 The assessment years proposed within the TA are outlined below:

- 2016 base;
- 2021 opening year;
- 2026 future year; and
- 2031 future year.

7.2.3 DfT Circular 02/2013 states that an opening year assessment should be undertaken (including full development) and any mitigation measures that are identified for the SRN should be based on this opening year assessment. An opening year assessment has been included within the TA.

7.2.4 The DfT Circular 02/2013 also indicates that a future year assessment should be undertaken (10 years after the planning application is submitted or at the end of the Local Plan period, whichever is later). AECOM consider that the future year assessment that should be included within the TA is 2031. However, whilst the year is identified for assessment within the TA, PBA indicate that this will just estimate traffic flows on the network rather than include any capacity analysis. AECOM recommend that this capacity analysis is undertaken to provide HE with details of the potential operation of their network in 2031 following development.

## 7.3 Committed Developments & Background Growth

7.3.1 PBA state that background growth has been calculated by applying growth factors taken from TEMPRO v6.2 and adding committed development trips from Napier Park and Land off Newlands Road. Whilst the current version of TEMPRO is now v7, however AECOM recognise that this TA was likely to have been prepared before v7 was released and that v6.2 growth factors are broadly higher than those in v7, therefore the use of v6.2 factors is considered to be robust.

7.3.2 AECOM have not been able to locate the documentation of TEMPRO growth factors used within the TA the main document or the appendices and therefore it has not been possible to check whether these have been derived or applied correctly.

7.3.3 Furthermore, AECOM has not been provided with a full set of traffic flows that will enable a check of the application of growth factors and committed development flows at M1 Junction 10, to determine whether they have been applied accurately and reasonably reflect the 'without development' flow scenario in relevant forecast years. AECOM has scrutinised the TAs for the relevant committed developments and for Newlands Road the flow diagrams do not include M1 Junction 10. Therefore it is unclear how these have been established for the proposed development TA.

7.3.4 It is recommended that full details of the build-up of flows at the M1 Junction 10 is provided so that AECOM can fully check the flows included within the models.

7.3.5 AECOM accept the addition of committed development flows associated with the Napier Park and Land off Newlands Road developments in principle. Furthermore, it is noted that PBA indicate that alternative assumptions have not been applied within TEMPRO to remove the Napier Park and Land off Newlands Road trips from the growth factor. As they have not been removed it is likely they have been double counted within the growth factors, which AECOM consider to be robust. It is reiterated however that a more detailed breakdown of the build-up of flows across M1 Junction 10 should be provided by PBA for AECOM to review.

7.3.6 The TA states that the proposed Luton Airport expansion has not been taken into account within the traffic forecasts as it is claimed that the development would have the greatest impact outside

of the peak periods being assessed as part of the TA. Furthermore it is claimed that the TEMPRO background traffic growth already takes into account the anticipated blanket growth within the area.

- 7.3.7 Whilst it is unclear what aspect of the proposed Airport expansion is included within TEMPRO v6.2, HE should be aware that as the Airport expansion does come forward this could have a significant impact on the operation of the SRN. Whilst the morning peak in passenger occurs before the traditional AM peak hour there is still the potential for an increase in trips in the PM peak. It is recommended that reference is made to the TA prepared in support of the Airport Expansion Planning Application and an assessment undertaken to determine if the application of TEMPro growth factors is sufficient to incorporate the anticipated increase in trips due to the planned airport expansion.

## 7.4 Proposed development highway impact

- 7.4.1 AECOM has attempted to replicate the PBA trip generation and distribution calculations to determine how many development trips are predicted to route via M1 Junction 10 and check the numbers outlined within table 8.2 of the TA. However, it has not been possible to replicate these numbers using the information provided within the TA. It is therefore requested that a detailed breakdown of how the totals in table 8.2 have been generated from the trip generation and distribution assumptions presented within the TA have been derived.

## 7.5 Junction capacity assessments

- 7.5.1 HE's primary concern, should the proposed development be implemented, is the operation of M1 Junction 10 in the forecast years and whether any measures are required to mitigate the impact of the Newlands Park development. There is also an interest in the operation of the A1081/London Road junction as there could be potential for queues developing on the A1081 northbound offslip could reach back and impact the operation of Junction 10.
- 7.5.2 The existing M1 Junction 10 is partially signalised and therefore PBA has used LinSig software to model the operation of the junction following the implementation of the proposed development. AECOM has undertaken a review of the proposed model to determine whether it is representative of the junction layout and required flow inputs and how the model predicts the junction will operate in the future following development. The following sections summarise AECOM's review of the model inputs and outputs.

### ***LinSig Model Review (M1 Junction 10)***

- 7.5.3 AECOM have undertaken a review of the M1 Junction 10 LinSig model to determine whether it is a reasonable reflection of the existing junction layout. It should be noted that a drawing of the junction has not been provided against which to compare the model and therefore the checks have been made using Google Maps.
- 7.5.4 AECOM consider that a number of aspects of the model have been reasonably coded, including lane widths and signal timings, based on the mapping available. However AECOM do have some concerns regarding the model that it is recommended are addressed by PBA. These are summarised below:
- Some arms within the model have not been allocated radius values. These values are used to model the impact the turn a vehicle makes can have on the saturation flow associated with the arm. A smaller radius (i.e. a tighter turn) results in a lower saturation flow. As appropriate radii have not been allocated to some arms AECOM are concerned that the model may be over-estimating capacity within the model.

- Lane 2 of Arm 3 (M1 southbound offslip) should be coded as a flare rather than a full lane. However due to the minimal number of vehicles that use this lane it is not anticipated that this will have a significant impact on the operation of the model.
- Lane 1 of Arm 4 (A1081 Airport Way) should be coded as a flare rather than a full lane.
- AECOM consider that the intercept and slope values for the Arm 4 give way approaches should ideally be taken from an ARCADY model of the junction. However if this is not available then they should fall in line with JCT guidelines. For roundabout approaches AECOM consider that values representing a 'Give Way Controlled Left Turn' should be used rather than 'Right turn at Signals'. These preferred values are an Intercept of 715 and a slope of 0.22 per lane. These values have not been used within the model and it is recommended that they are changed.
- The lane connector between Arm 4 lane 3 and Arm 2 lane 1 (southern circulatory) should be removed as this would involve vehicles merging from two lanes to one, which would be unlikely to occur in reality for safety reasons.
- A number of the times allocated to connectors would result in unrealistically high link speeds. Alternatively, if speeds were allocated to the connectors the circulatory link lengths would need to be revised to accurately reflect their link, rather than using the default LinSig value of 345m.
- Some connectors do not have a time or speed allocated to them.
- Notwithstanding the concerns raised earlier within this note regarding the lack of clarity over the build-up of future year traffic flows and uncertainty regarding how the development flows at the junction have been calculated, which AECOM have been unable to check due to a lack of information, AECOM consider that the additional development trips have not been included within the model accurately. The total development flows within the model are not consistent with those outlined in table 8.2 of the TA and have not been represented on the flow diagrams provided in Appendix I accurately.
- Some queue length information is provided within the appendices of the TA, however not all the time periods that are modelled are included within the data. The reasons for this are unclear. It is recommended that a calibration/validation of the base model is undertaken using queue length data by PBA to determine whether the model is reasonably reflecting observed traffic conditions.

7.5.5 Despite concerns regarding the model raised above the following table presents the results from the model at face value. It should be noted that these results could change notably following the changes recommended above.

7.5.6 The tables below demonstrate that the model operates over-capacity in the 2021 and 2026 AM, PM and Saturday peaks following development, with unacceptable queue lengths predicted to occur on the M1 northbound off-slip and corresponding southern circulatory. Furthermore, these queues are a significant increase when compared to the 'without development' scenarios.



**Table 2: M1 Junction 10 AM Peak PBA LinSig model outputs**

Arm	Arm Description	2021				2026			
		Without Dev.		With Dev.		Without Dev.		With Dev.	
		DoS (%)	MMQ	DoS (%)	MMQ	DoS (%)	MMQ	DoS (%)	MMQ
1	M1 northbound off-slip	83.5	27	90.3	33	86.5	30	94.6	40
3	M1 southbound off-slip	78.6	6	91.6	9	88.0	9	96.7	11
4	Airport Way	73.8	1	75.2	2	79.4	2	98.4	15
2	Southern Circulatory	83.3	14	93.6	19	97.2	22	98.0	25

**Table 3: M1 Junction 10 PM Peak PBA LinSig model outputs**

Arm	Arm Description	2021				2026			
		Without Dev.		With Dev.		Without Dev.		With Dev.	
		DoS (%)	MMQ	DoS (%)	MMQ	DoS (%)	MMQ	DoS (%)	MMQ
1	M1 northbound off-slip	96.4	36	102.0	55	101.8	54	111.9	106
3	M1 southbound off-slip	53.0	1	61.0	1	55.7	1	63.6	1
4	Airport Way	88.6	4	98.1	15	91.6	5	97.8	13
2	Southern Circulatory	94.6	28	118.1	117	107.3	62	122.3	132

**Table 3: M1 Junction 10 Saturday Peak PBA LinSig model outputs**

Arm	Arm Description	2021				2026			
		Without Dev.		With Dev.		Without Dev.		With Dev.	
		DoS (%)	MMQ	DoS (%)	MMQ	DoS (%)	MMQ	DoS (%)	MMQ
1	M1 northbound off-slip	67.9	15	60.2	14	53.2	11	61.3	14
3	M1 southbound off-slip	34.4	0	44.0	0	36.4	0	46.1	0
4	Airport Way	49.3	1	59.6	1	57.3	1	63.7	1
2	Southern Circulatory	67.7	15	66.2	11	56.5	9	63.5	11

7.5.7 It should also be noted that the southern circulatory links within the model experiences very high DoS values and queue lengths, particularly in the PM peak scenarios. In reality, in order to protect the operation of the roundabout circulatory this link would be operating with a DoS value below 80%, which would require considerably more green time than is currently allocated, taking green time away from the M1 northbound off-slip approach.

7.5.8 AECOM has undertaken a quick test using the LinSig model, to understand the implications for the M1 northbound off-slip in 2021 following development if the circulatory DoS is restricted to under 80%. In the 2021 PM peak this protection of the circulatory operation would result in a DoS on the M1 northbound off-slip approach of 165.8%, with MMQ lengths of 267 PCUs. In the ‘without development scenario the equivalent outputs are 114.7% and 101 PCUs. This demonstrates that whilst the approach could operate significantly over-capacity in 2021 without the additional Newlands Park development traffic, the addition of this traffic would drastically increase the queuing on the off-slip, which could stretch back to the mainline carriageway.

7.5.9 It should be noted that these conclusions should be re-considered once the model is revised based on AECOM’s comments above.

7.5.10 In addition to the above an assessment of the merge/diverge and slip road capacity requirements should be presented for review. In addition to slip road, merge and diverge assessments related to connections to the M1, this assessment should include an assessment of the dedicated left turn and merge with the M1 Southbound Onslip, with consideration given to the maximum flow that could be accommodated within the single lane currently available.

**ARCADY Model Review (A1081/London Road)**

7.5.11 PBA has also built ARCADY models of the A1081/London Road roundabouts. AECOM has been unable to review the models in detail due to a lack of a junction drawing or Google Images of the relatively new junction. Furthermore, due to AECOM’s concerns regarding the flow composition in the M1 Junction 10 model, it is recommended that the flows within the A1081/London Road models are checked following this review.

7.5.12 Regardless of these concerns, there are model results presented within the TA for the junction. Taken at face value these results suggest that the New Airport Way Northbound Offslip (of primary

concern to HE) will broadly operate within capacity in 2021 and 2026 and therefore queues generated may not affect the SRN. It is recommended that this is reconsidered following checks by PBA.

## 7.6 Mitigation

7.6.1 PBA provide some details regarding potential mitigation that could be provided at M1 Junction 10 in order to mitigate the possible issues that are predicted to arise as a result of the proposed Newlands Park development. These suggestions are summarised below:

- An additional lane to be added to the southern circulatory and M1 northbound onslip.
- An alternative sustainable transport strategy.

7.6.2 The impact of these proposals has not yet been assessed by PBA and therefore the potential impact they could have is not yet understood. However, following on from the recommended changes to the LinSig modelling it is recommended that some mitigation measures are identified and modelled by PBA to determine whether they are feasible and sufficient to ensure the junction operates within capacity following development.

7.6.3 It should be noted that AECOM acknowledge that any mitigation measures provided at a junction to support a development should be proportional to that development and within the gift of the developer. The impact of the Newlands Park development at M1 Junction 10 is predicted to be significant and therefore the required mitigation measures may need to be extensive.

7.6.4 AECOM are also aware of other developments that are coming forward within the vicinity of M1 Junction 10, which could have an impact on the operation of the junction. Consideration could be given to undertaking a cumulative assessment of the impact of the relevant developments to determine the overall operation of the junction, what mitigation measures need to be provided to support development coming forward within the vicinity of the junction and how the funding could be provided for this.

## 8 Conclusion

### 8.1 Summary and Conclusion

8.1.1 This technical note has been prepared by AECOM on behalf of Highways England to document a review of a Transport Assessment associated with proposed mixed use development at Newlands Park, Luton. AECOM has raised a number of concerns and recommendations throughout this note, which are underlined for ease of reference. It is recommended that these are addressed by PBA and a revised TA is prepared to fully assess the impact of the proposed development on the operation of the strategic road network.

---

*This document has been prepared by AECOM Limited for the sole use of our clients ("Highways England") and in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM Limited and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM Limited, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM Limited.*

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Planning Application 16/01401/FULEIA - land Adjacent Junction 10 to 10A - M1 - Newlands Road - Luton  
**Date:** 25 October 2016 16:00:51  
**Attachments:** [TN\\_Newlands Park TA Review v8.pdf](#)

---

Dear [REDACTED]

Please find AECOM Technical Note dated 24 October 2016 for your consideration.

Can you please address issues raised. Can I ask you liaise directly with [REDACTED]

[REDACTED] at AECOM on technical issues and copy me in.

I spoke with [REDACTED] earlier this afternoon advising him I would forward the TN to the LPA (confidential) to keep them informed on progress.

Please do not hesitate to contact me should you wish to discuss.

Regards

[REDACTED]  
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

**Tel:** [REDACTED]

**Web:** <http://www.highways.gov.uk>

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Planning application 16/01401/FULEIA - Land Adjacent Junction 10 to 10A - M1 - Newlands Road - Luton,  
**Date:** 25 October 2016 16:11:32  
**Attachments:** [TN\\_Newlands\\_Park\\_TA\\_Review\\_v8.pdf](#)  
[Planning\\_Application\\_Responses.msg](#)

---

CONFIDENTIAL

Dear [REDACTED],

Please find AECOM Technical Note dated 24 October 2016. I have this afternoon forwarded it to PBA for their consideration.

[REDACTED],

I am going home now. I would like to meet or talk over the phone regarding the planning applications referred to in [REDACTED] email and LBC submission to the Planning Inspector in advance of the Hearings commencing in December.

I am in the office soon after 7 AM on Monday so could be at your offices late morning or afternoon if you feel a meeting would be preferable.

Regards

[REDACTED]

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

**Tel:** [REDACTED]

**Web:** <http://www.highways.gov.uk>

**GTN:** [REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Planning Application Responses  
**Date:** 24 October 2016 16:12:06

---

**THIS EMAIL ADDRESS IS NOT SECURE FOR THE TRANSMISSION OF UNENCRYPTED SENSITIVE DATA**

Hi [REDACTED]

I just wanted to check that you're available tomorrow afternoon for a telephone call regarding responses to major planning applications in Luton. If so, [REDACTED] and I would like to discuss progress on the following matters:

- Power Court TA
- Newlands Park TA
- Napier Park TA
- Local Plan – review of modelling following the EIP

Let me know if there are any other matters you'd like to discuss.

Best regards,

[REDACTED]

[REDACTED]

Highway Development & Sustainable Travel Manager

Place & Infrastructure

Luton Borough Council

Town Hall

Luton LU1 2BQ

Email [REDACTED]

Tel: [REDACTED]

LutonLogo



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Like us on Facebook: Luton Council

**From:** [REDACTED]  
**To:** ["developmentcontrol@luton.gov.uk"](mailto:developmentcontrol@luton.gov.uk)  
**Cc:** [REDACTED]  
**Subject:** Planning applications 16/01400/OUTEIA Power Court, Luton and 16/01401/OUTEIALand Adjacent Junction 10 to 10A M1, Newlands Road - Luton  
**Date:** 13 December 2016 15:29:09  
**Attachments:** [Scanned document.msg](#)

---

For the attention of [REDACTED]

Dear [REDACTED]

I refer to previous Highways England response to the above planning applications. Highways England had a meeting with the applicant and his consultants on 12 December 2016 when agreement was reached on outstanding issues. In order for this work to be completed Highways England recommend Luton Borough Council do not grant planning permission before 31 January 2017. Should this work be completed before Highways England will replace this recommendation with one seeking conditions where applicable that will apply in the event of the planning authority granting planning consent.

Regards

[REDACTED]  
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

**Tel:** [REDACTED]

**Web:** <http://www.highways.gov.uk>

[REDACTED]



## Developments Affecting Trunk Roads and Special Roads

### Highways England Planning Response (HEPR 16-01)

### Formal Recommendation to an Application for Planning Permission

From: Martin Fellows  
Operations (East)  
[planningee@highwaysengland.co.uk](mailto:planningee@highwaysengland.co.uk)

To: Luton Borough Council FOA – [REDACTED]

CC: [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: 16/01401/OUTEIA

Referring to the planning application referenced above, dated 9 September 2016, Outline planning permission with all matters reserved except for access, for mixed use development comprising: office floor space (use class B1), retail floorspace (use class A1), food and beverage – Land Adjacent Junction 10 to 10A, M1, Newlands Road, Luton, notice is hereby given that Highways England's formal recommendation is that we:

- a) ~~offer no objection;~~
- b) ~~recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- d) ~~recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is / is not relevant to this application.<sup>1</sup>

---

<sup>1</sup> Where relevant, further information will be provided within Annex A.



This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk).

<b>Signature:</b> [REDACTED]	<b>Date:</b> 13 December 2016
<b>Name:</b> [REDACTED]	<b>Position:</b> Assistant Asset Manager
<b>Highways England:</b> Woodlands, Manton Lane Bedford MK41 7LW	
[REDACTED]	

**Annex A**      **Highways England recommended further assessment required**

HIGHWAYS ENGLAND ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application 16/01401/OUTEIA and has been prepared by [REDACTED]

Highways England has been collaborating with the developer on pre-application discussions regarding development traffic impact on the Strategic Road Network, M1 junction 10. Highways England will require to review and assess the Transport Assessment supporting the application to determine if there is sufficient capacity for the junction to operate safely or identify mitigation required.

Highways England had a meeting with the applicant and his consultants on 12 December 2016 when agreement was reached on outstanding issues. In order for this work to be completed Highways England recommend Luton Borough Council do not grant planning permission before 31 January 2017. Should this work be completed before Highways England will replace this recommendation with one seeking conditions where applicable that will apply in the event of the planning authority granting planning consent.

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Newlands Park - additional material  
**Date:** 16 January 2017 10:14:39  
**Attachments:** [image007.png](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

---

Good morning [REDACTED]




Following our discussion this morning, please find below email exchange (for your records) had on Friday, which I don't believe you were copied in on.

Kind regards,

[REDACTED]

Principal Transport Planner

For and on behalf of Peter Brett Associates LLP - [Cambridge](#)

  t [REDACTED]  
m [REDACTED]  
 e [REDACTED]  
w [peterbrett.com](http://peterbrett.com)



---

**From:** [REDACTED]

**Sent:** 13 January 2017 16:16

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: Newlands Park - additional material

Dear [REDACTED]

My understanding was the appendices you refer to below were included within the zip file previously sent by simplesend. Apologies if not.

I have set up a simplesend below with the data you request. Points third and fourth points relate to data within the Appendix C/D files.

<http://SimpleSend.it/d/91742b39e37a42caa9cbf99e8d98eb9a823005bcaf4840>

Apologies to those who have already received my email. I received a bounce back email from [REDACTED] so thought it best to send on again with correct distribution list.

Kind regards,

[REDACTED]

Principal Transport Planner

For and on behalf of Peter Brett Associates LLP - [Cambridge](#)

  t [REDACTED]



m [REDACTED]  
e [REDACTED]  
w [peterbrett.com](http://peterbrett.com)



---

**From:** [REDACTED]  
**Sent:** 13 January 2017 11:07  
**To:** [REDACTED]  
**Subject:** FW: Newlands Park - additional material  
FYI

---

**From:** [REDACTED]  
**Sent:** 13 January 2017 10:40  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** Newlands Park - additional material

Dear [REDACTED]

I am contacting you on behalf of Highways England regarding the proposed Newlands Park development in Luton (Planning Application Reference: (16/01401/OUTEIA). AECOM is being commissioned by Highways England to review the associated Transport Assessment Addendum Report, dated 21<sup>st</sup> December 2016. To ensure our review is as complete as possible, would it be possible for you to provide copies of the following?

- Traffic Flows Spreadsheet (Appendix C)
- LinSig model files (Appendix D)
- Retail trip rate spreadsheet & capacity modelling (mentioned in Section 4.1)
- Retail gravity model spreadsheet (mentioned in Section 6.1)

I look forward to your reply.

Kind regards,

[REDACTED]  
Consultant, Transport Planning

[REDACTED]  
[REDACTED]

**AECOM**

AECOM House  
63-77 Victoria Street  
St Albans, Hertfordshire, AL1 3ER  
T +01727-535000  
[aecom.com](http://aecom.com)

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**From:** [REDACTED]  
**To:** ["developmentcontrol@luton.gov.uk"](mailto:developmentcontrol@luton.gov.uk)  
**Cc:** [REDACTED]  
**Subject:** Planning applications 16/01400/OUTEIA and 16/01401/OUTEIA  
**Date:** 30 January 2017 10:03:04  
**Attachments:** [Scanned document.msg](#)  
[image003.jpg](#)

---

For the attention of [REDACTED]

Dear [REDACTED]

I refer to previous Highways England response dated 13 December 2016 to the above planning applications.

The applicant provided Highways England on 21 December 2016 with a Transport Assessment Addendum Reports relating to Highways England queries and clarifications sought on the original Transport Assessments for Newlands park and Power Court. Highways England consultants are currently reviewing the Reports and will be providing comments no later than 3 February 2017.

To enable the applicants consultant to complete these outstanding works Highways England recommend Luton Borough Council do not determine the planning application before 31 March 2017.

Regards

[REDACTED]  
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

**Tel:** [REDACTED]

**Web:** <http://www.highways.gov.uk>

**GTN:** [REDACTED]

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Customer Contact Centre is available 24/7 on 0300 123 5000 or [info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)



**Developments Affecting Trunk Roads and Special Roads**  
**Highways England Planning Response (HEPR 16-01)**  
**Formal Recommendation to an Application for Planning Permission**

**From:** Martin Fellows  
Operations (East)  
[planningee@highwaysengland.co.uk](mailto:planningee@highwaysengland.co.uk)

**To:** Luton Borough Council FOA – [REDACTED]

**CC:** [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

**Council's Reference:** 16/01401/OUTEIA

Referring to the planning application referenced above, dated 9 September 2016, Outline planning permission with all matters reserved except for access, for mixed use development comprising: office floor space (use class B1), retail floorspace (use class A1), food and beverage – Land Adjacent Junction 10 to 10A, M1, Newlands Road, Luton, notice is hereby given that Highways England's formal recommendation is that we:

- a) ~~offer no objection;~~
- b) ~~recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- d) ~~recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is / is not relevant to this application.<sup>1</sup>

---

<sup>1</sup> Where relevant, further information will be provided within Annex A.

This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk).

Signature: [REDACTED]	Date: 30 January 2017
Name: [REDACTED]	Position: Assistant Asset Manager
Highways England: Woodlands, Manton Lane Bedford MK41 7LW	
[REDACTED]	

**Annex A     Highways England recommended further assessment required**

HIGHWAYS ENGLAND ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application 16/01401/OUTEIA and has been prepared by [REDACTED]

Highways England has been collaborating with the developer on pre-application discussions regarding development traffic impact on the Strategic Road Network, M1 junction 10. Highways England will require to review and assess the Transport Assessment supporting the application to determine if there is sufficient capacity for the junction to operate safely or identify mitigation required.

The applicant has provided Highways England with a Transport Assessment Addendum Reports relating to Highways England queries and clarifications sought on the original Transport Assessments for Newlands park and Power Court. Highways England consultants are currently reviewing the Reports and will be providing a response on 3 February 2017.

The applicant has provided Highways England with a Transport Assessment Addendum Reports relating to Highways England queries and clarifications sought on the original Transport Assessments for Newlands Park and Power Court. Highways England consultants are currently reviewing the Reports and will be providing a response on 3 February 2017.

In order for this work to be completed Highways England recommend Luton Borough Council do not grant planning permission before 31 March 2017. Should this work be completed before Highways England will replace this recommendation with one seeking conditions where applicable that will apply in the event of the planning authority granting planning consent.



**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED], [REDACTED], [REDACTED], [REDACTED]  
**Subject:** Newlands Park TA Addendum Review  
**Date:** 02 February 2017 20:17:58  
**Attachments:** [TN\\_Newlands\\_Park\\_TA\\_Addendum\\_Review\\_v6.docx](#)  
[TN\\_Newlands\\_Park\\_TA\\_Addendum\\_Review\\_v6.pdf](#)

---

[REDACTED]  
As you previously requested that I send the Newlands Park and Power Court reviews back to you as you are now back in the office, please find attached the review of the Newlands Park TA Addendum (Power Court is due next week).

I have attached the PDF and Word versions as you requested and copied [REDACTED] in for completeness.

Please let me know if you have any questions.

Regards,

[REDACTED]  
[REDACTED]  
Principal Consultant, Transportation

D [REDACTED]  
[REDACTED]

**AECOM**

AECOM House  
63-77 Victoria Street  
St Albans, Herts, AL1 3ER, United Kingdom  
T +44-01727-535000  
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Project: **Highways England Spatial Planning Arrangement** Job No: **60506522 DL005.005**

Subject: **Newlands Park (M1 J10) TA Addendum Response**

Prepared by: [REDACTED] Date: 17<sup>th</sup> January 2017

Checked by: [REDACTED] Date: 27<sup>th</sup> January 2017

Verified & Approved by: [REDACTED] Date: 2<sup>nd</sup> February 2017

## 1 Introduction

- 1.1.1 Peter Brett Associates LLP (PBA) have been commissioned by the Newlands Park developers, 2020 Developments, to provide transportation advice in support of proposals for a mixed use scheme near M1 Junction 10 adjacent to the M1 and A1081 Airport Way.
- 1.1.2 This Technical Note (TN) has been prepared by AECOM, on behalf of Highways England (HE), in response to a Transport Assessment Addendum (TAA) prepared by PBA relating to Newlands Park. The TAA is dated December 2016 and follows on from a TA dated August 2016. The TA was prepared in support of a planning application made to Luton Borough Council (reference 16/01401/OUTEIA). PBA previously partially detailed their proposed approach for the TA, which AECOM reviewed within a number of TNs, dated March, June and July 2016.
- 1.1.3 The purpose of this TN is to confirm whether or not the previous aspects of AECOM's responses in a review of the TA dated October 2016 have been addressed and to conduct a full review of the relevant sections of the TAA and associated documents to determine whether the potential impact of the proposed development on the strategic road network (SRN) has been reasonably assessed. This includes a review of trip generation, distribution and assignment, as well as junction capacity assessments for the M1 J10 gyratory.
- 1.1.4 HE is responsible for the monitoring, management and maintenance of the strategic road network (SRN). M1 Junction 10 is located approximately 250m away from the proposed development site and the site's potential impact on the junction has been the primary focus of previous reviews.
- 1.1.5 AECOM previously requested confirmation of the proposed land use mix for the site. PBA have confirmed the development mix as the following:
  - Up to 42,000sqm of office floor space (Use Class B1(a));
  - Up to 37,000sqm of comparison retail floor space (Use Class A1);
  - Up to 300sqm of convenience retail floor space (Use Class A1);
  - Up to 8,500sqm of food and beverage floor space (Use Classes A3-A6)
  - Up to 16,000sqm of leisure floor space (Use Class D2);
  - Up to 8,500sqm of retail/leisure servicing and ancillary floor space;
  - A hotel (Use Class C1) of up to 350 bedrooms (up to 13,000sqm); and

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- Between 3,000 – 3,600 car parking spaces.
- 1.1.6 The TAA states that the above quantum of floor area represents a maximum scale of development and that the TA assumes these maximum values and therefore provides a robust assessment of the proposed development mix and scale.
- 1.1.7 Ignoring the servicing and ancillary floor space the above development quantum's match those assessed within the TA and the TA should therefore result in a reasonable reflection of the potential land use quantum. Should actual floor areas be less than assessed then there is potential for TA to be a robust assessment of the actual development.

## 2 Existing Conditions – Accident Data

### 2.1 PBA Findings

- 2.1.1 The TA made reference to existing accident data at M1 Junction 10. It stated at the time that the most recent data was not available and therefore high level accident data was sourced from the website 'crashmap.co.uk'. AECOM recommended that if the most recent detailed data became available then it should be analysed.
- 2.1.2 PBA have responded with the provision of details of additional accident data from Luton Borough Council (LBC) and Central Bedfordshire Council (CBC).
- 2.1.3 The analysis shows that 14 accidents were recorded at or in the vicinity of M1 Junction 10 between 2011 and 2016. There has not been an accident at this location since November 2014. Of the 14 accidents, 11 were slight, 2 were serious and 1 was fatal. None of the accidents involved cyclists or pedestrians. It should be noted that the analysis only includes the gyratory and immediate approaches and does not include the M1, or M1 Junction 10 slip roads, or merge/diverge areas.
- 2.1.4 Based on the information provided by PBA, AECOM consider that for the six year period considered the M1 Junction 10 gyratory is not considered to suffer an exceptionally high number of accidents historically and that further investigation into the potential impact of the additional development traffic based on these statistics is not required. It should be noted that if any changes in layout are proposed to the junction to support the proposed development then these should be subjected to the usual design check reviews, including review against best practice and identification of departures from standards, together with NMU and Road Safety Audits in accordance with the DMRB.

## 3 Trip Generation Methodology

### 3.1 Introduction

- 3.1.1 This section of the report reviews PBA's approach to the trip generation methodology and confirms whether AECOM's previous recommendations made within the TA review have been taken into account and addressed.
- 3.1.2 AECOM previously considered PBA's method of trip generation for office, hotel, leisure and food and beverage land uses to be acceptable. Questions were however raised regarding the calculation of retail trip rates.

## 3.2 Retail

- 3.2.1 AECOM previously agreed that the weekend sites used within TRICs were comparable with the proposed development, however there were concerns regarding PBA's methodology. PBA indicated that due to the limited number of TRICS weekday retail surveys, previous experience was used to determine a weekday: weekend retail ratio, in order to calculate weekday trip rates based on those calculated from TRICS for the weekend, however no evidence to support this experience was provided. AECOM then recommended that the evidence was provided to determine whether the approach taken by PBA is reasonable.
- 3.2.2 PBA have indicated that the evidence used to support the approach in the TA was not in the public domain and responded with the results of an investigation into the demand profile of five retail outlets within around an hour's driving distance of Luton to determine a robust ratio between weekend and weekday usage. PBA used Google's 'Popular Times' data outputs which determines the popular times and average visit duration for a retail outlet. The data was used to determine a Weekend peak hour: Friday AM peak hour ratio of approximately 10:1 and a Weekend peak hour: Friday PM peak hour ratio of approximately 4:1.
- 3.2.3 All five of the retail outlets used for this analysis were located within the centre of an urban area with a more central location and likely better public transport links than the proposed site. The demand profile for these outlets could be different when compared against that for the proposed Newlands Park development, which will be located on the edge of the town. The predominately town centre locations used also typically have a varying range of leisure facilities, public houses and restaurants. The range of facilities and their use may have an influence on the perceived weekend: weekday retail trip ratio, with those locations with greater facilities enjoying a higher proportion of weekday trips. AECOM considers that their use may give an indication of the ratio that may be applicable to the Newlands Park development.
- 3.2.4 To calculate the weekend retail trip rates, PBA previously proposed a trendline approach due to a lack of appropriate Retail Parks similar in size to the proposed development being available in TRICS. AECOM understood this method had been employed to justify use of a lower trip rate per 100 sqm GFA than that given by an average of sites within TRICs. The trendline produced was an extrapolation and fell well outside of the values used and the resultant vehicle trip rates were significantly lower than the trip rates recorded for any sites included within TRICS, therefore there was deemed to be a risk of underestimating retail trips. AECOM recommended a comparison of the vehicle trip rates derived from this approach and trip rates available from TRICS. In the event of significant differences being identified, consideration should have been given to the presentation of sensitivity tests which assess the impact to the operation of the SRN should these higher trip numbers occur.
- 3.2.5 PBA state in the TA Addendum that the use of average trip rates from TRICS will generate an unrealistic scenario which does not acknowledge retail demand that confirms a reduction in trip rates as the scale of retail increases. PBA considers a sensitivity test using trip rates from TRICS will provide an overly robust scenario. Justification is based upon academic research from 1985 and 1995 which supports the theory that as retail centres increase in scale, the number of additional trips they attract does not increase at the same rate as the additional floor space beyond a certain scale of development.
- 3.2.6 PBA have conducted a sensitivity test as per AECOM's recommendation. Any analysis conducted in the remainder of this report will take into account trips calculated through both the trendline and average TRICS trip rate methods. Whilst AECOM recognise that the trendline trip rates may be a more realistic representation of those that could be generated by the site, the sensitivity test analysis using the average trip rates is welcomed.

## 4 Mode Share

### 4.1 Introduction

- 4.1.1 AECOM previously considered PBA's mode calculation for office, hotel, leisure and food and beverage land uses to be acceptable.

### 4.2 Retail

- 4.2.1 PBA calculated the modal split for the retail land use directly from weekend TRICS data for both the weekday and weekend modal splits, due to a lack of suitable weekday retail sites available within TRICS. AECOM considered this approach to be reasonable. AECOM noted that within the trip generation calculations in the TA it appeared that the retail trip rates for the PM Peak had been multiplied by an AM Peak mode share instead of a PM peak mode share, contrary to the methodology outlined within the TA.
- 4.2.2 PA have responded by confirming that the mode share split for retail park surveys at the weekend has been used to determine the trip rate per mode as there is a limited number of weekday retail surveys available within TRICS. Therefore AECOM deems this point resolved.

### 4.3 Vehicular Trip Types

- 4.3.1 PBA has presented evidence from TRICS Research Report 95/2, which provides details of the percentage of pass-by and diverted trips associated with food superstores. These percentages are for food retail and PBA indicate that they are a good proxy for the proposed retail development. AECOM questioned the basis for this conclusion as there may be potential for food retail to experience a higher proportion of pass-by trips than non-food retail. Evidence to suggest that food and non-food retail pass-by proportions are similar was not provided by PBA and it was recommended that this was supplied to support the use of pass-by/diverted/transferred trips.
- 4.3.2 PBA have responded, emphasising the importance that diverted trips are properly represented and warn of the risks of double counting, given one of the main aspirations of the proposed development is to *"deliver an uplift in comparison retailing that will fundamentally improve and strengthen Luton's retail offer, enabling it to meet its regional function, compete more effectively with nearby centres and stem some of the significant leakage of retail expenditure"*. PBA consider the trip reductions on the network surrounding the site conservative compared to other assessments.
- 4.3.3 AECOM acknowledges that reducing existing trips to represent pass-by/diverted trips is important in accurately assessing the impact of a development on the surrounding highway network. However, evidence has not been provided to justify using the high pass-by potential of food retail as a proxy for the proposed retail development to reduce trips.
- 4.3.4 The TA indicated reductions of 27%, 38% and 21% from the weekday AM, weekday PM and Saturday peak retail trips respectively were applied to the network. AECOM previously highlighted that not all such trips should be removed from the network as some can follow a different route to the existing trip and be new to certain parts of the network. It was recommended that the impact of diverted and transferred trips is considered in more detail.
- 4.3.5 PBA have responded, stating not all such trips have been taken into account when the manual reductions were made, as the majority of trips will not be new to the network, therefore providing robustness. AECOM consider this to be broadly acceptable going forward. Furthermore PBA also indicate that no reduction has been applied to take into account linked trips on the site, which is also considered to be robust.

## 5 Trip Distribution and Assignment

### 5.1 Retail

- 5.1.1 In order to distribute retail trips, PBA created a Retail Gravity Model based on population, travel time and knowledge of existing retail outlets. LBC's Retail Study Update Report (July 2015) was used to determine the location of other competing retail centres with a reduction factor established through the Gravity Model then applied to these competing zones. AECOM considered this approach reasonable but expressed concern at the lack of evidence on how the reduction factors were calculated. PBA has confirmed that the factor has been calculated through a comparison of the existing retail in the alternative centres and the proposed retail at Newlands Park. Additional information about how the factors have been calculated has been provided in supplementary spreadsheets. Whilst it is still not fully clear how the volume of existing retail in nearby towns was established, AECOM consider that the process used is reasonable.
- 5.1.2 The result of PBA's retail distribution calculations demonstrated that 60% of trips were predicted to route via M1 Junction 10. AECOM consider that this is relatively robust and has been calculated reasonably.

## 6 Parking

### 6.1 Parking Accumulation

- 6.1.1 AECOM previously deemed the level of parking spaces for office, hotel, leisure, food and beverage and retail land uses to be acceptable.
- 6.1.2 AECOM previously highlighted that discussions had previously taken place regarding the potential for the proposed development car park to be used on Luton Town Football Club match days as a park and ride facility which could have implications for M1 Junction 10. Confirmation was requested as the TA did not indicate whether such a facility will be provided as part of the proposed development.
- 6.1.3 PBA mention in their response that LBC are still considering a park and ride site in the vicinity of the proposed development. PBA then state that as measures encouraging public transport will be provided (such as bus stops with real-time information), shoppers intending to travel to central Luton could effectively 'park and ride' using the proposed development.
- 6.1.4 Whilst the commitment to providing high quality public transport links between the proposed development and central Luton is welcomed, AECOM is concerned that people not intending to use the facilities could be attracted to park at the site during the peak hours. These trips have not been accounted for in the trip generation and distribution process and may result in additional impact to the highway network in the vicinity of the development. These additional trips could lead to overloading of the car park, with the potential for vehicles to block back onto the highway network and potentially the SRN. The potential for additional unofficial park and ride trips at M1 Junction 10 has not been accounted for in the TA and therefore has not been assessed in the associated modelling. AECOM recommends that details are provided of the parking controls that would be in place for retail visitors to the Newlands Park site. AECOM also recommends that more information on specific park and ride aspirations for the area is made available as soon as possible, so the impact that these extra trips will have on the SRN is accurately assessed. Details regarding whether there would be a requirement to submit a further planning application for this should also be provided.

## 7 Highway Impact Assessment

### 7.1 Assessment Scope

- 7.1.1 An impact assessment was included in the TA with M1 Junction 10 the only SRN junction assessed. AECOM agreed with their inclusion but recommended that PBA consider assessing M1 Junction 11 as it was considered that the high trip generation associated with the proposed development could result in an impact further afield than Junction 10.
- 7.1.2 PBA state that it was agreed in scoping discussions with LBC and HE that Junction 10 would be the only SRN junctions assessed (which AECOM can confirm was agreed). However PBA have undertaken analysis of the impact on Junction 11 slip roads, in terms of the total number of trips both for Newlands Park alone and cumulatively with Power Court. The total number of additional trips at the Junction 11 associated with the Newlands Park development is predicted to be between 150 and 200 trips in the AM, PM and Saturday Peak.
- 7.1.3 PBA reference the proposed A5-M1 Dunstable Northern Bypass link which is due to be completed in June 2017 and consider that as this will provide an alternative route to access the M1 and therefore could free up capacity at Junction 11, which could be utilised by the Newlands Park traffic. PBA therefore conclude that no further assessment is considered necessary at Junction 11.
- 7.1.4 AECOM considers that the additional traffic volume reported by PBA at Junction 11 is not insignificant and could result in increased congestion. AECOM acknowledges that the M1-A5 link has the potential to attract M1-bound traffic away from Junction 11 by providing additional access at M1 Junction 11a, however the potential for this is not explored further within the TA and therefore it is still unclear whether there would be sufficient capacity at Junction 11 to accommodate the additional Newlands Park development trips.
- 7.1.5 It is acknowledged that a scope of assessment which did not include M1 Junction 11 was previously agreed in an AECOM Scoping Note review, however it is recommended that consideration is given to undertaking this analysis as the impact of the development is now better understood.

### 7.2 Assessment Scenarios

- 7.2.1 DfT Circular 02/2013 states that an opening year assessment should be undertaken, from which any mitigation measures required should be established. An opening year of 2021 was included in the TA.
- 7.2.2 DfT Circular 02/2013 indicates that a future year assessment should be undertaken (10 years after the planning application is submitted or at the end of the Local Plan period, whichever is later). AECOM considered that the future year assessment that should be included within the TA is 2031. However, whilst the year was identified for assessment within the TA, PBA indicated that this will just estimate traffic flows on the network rather than include any capacity analysis. AECOM recommended that this capacity analysis was undertaken to provide HE with details of the potential operation of their network in 2031 following development. A full capacity assessment will be carried out for 2026, 10 years after planning submission.
- 7.2.3 PBA state that as the future year of 2031 is 15 years post planning submission, no formal capacity analysis has been undertaken. AECOM recognise that the Local Plan with an end year of 2031 has not yet been adopted and therefore a 2026 forecast year is in line with DfT Circular requirements, however consideration of a 2031 forecast year is welcomed.

### 7.3 Committed Developments & Background Growth

- 7.3.1 PBA calculated background traffic growth by applying TEMPRO v6.2 growth factors, a process AECOM accepted as robust.
- 7.3.2 However, AECOM could not locate the growth factors used within the TA, therefore it was not possible to check these. Furthermore, a full set of traffic flows were not provided, which would have enabled a check on whether they had been applied accurately. AECOM recommended that full details of the build-up flows at M1 Junction 10 were provided so the flows included within the models could be checked.
- 7.3.3 PBA have responded by providing the traffic flow diagram spreadsheet. AECOM can confirm that the TEMPRO 6.2 growth factors listed have been applied correctly, however the factors used within the spreadsheet are not consistent with those calculated by AECOM using TEMPRO. It is recommended that these growth factors are rectified to ensure consistency with TEMPRO.
- 7.3.4 The TA did not take the proposed expansion of Luton Airport into account within the traffic forecasts. It was claimed that the airport expansion would have the greatest impact outside of the peak periods assessed and that the TEMPRO background growth factors would already have taken this into account. AECOM expressed concern that there was a potential for an increase in weekday PM peak trips due to the airport and recommended that an assessment was undertaken to determine whether the anticipated increase in trips due to the airport expansion fell within the predicted growth factor.
- 7.3.5 PBA compared the trip generation presented within the Airport Expansion TA with the TEMPRO growth factors and indicated that the factors used to produce the 2031 scenario were notably higher than the anticipated additional trips due to airport expansion. PBA also indicated that Napier Park committed development trips have been included in the assessment and that it can be assumed that a proportion of the Luton Airport Expansion trip generation has already been realised on the network. AECOM agree that the TEMPRO growth factors adequately cover growth expected from the airport expansion and other development in the forecast years outlined.

### 7.4 Proposed Development Highway Impact

- 7.4.1 AECOM previously attempted replicating PBA's trip generation and distribution calculations to determine the impact of development trips at M1 Junction 10. It was not possible to do so using the information provided within the TA. AECOM then requested a detailed breakdown of how the trip totals were generated and how trip distribution assumptions were derived.
- 7.4.2 PBA have responded by providing the traffic flow diagram spreadsheet. As the process behind the trip generation has slightly changed, the figures presented in Table 8.2 of the TA are no longer current. AECOM has reviewed the spreadsheet provided and accepts the calculations shown.
- 7.4.3 The spreadsheet provided by PBA indicates that the proposed development could result in an additional 598, 819 and 852 PCU trips in the AM, PM and Saturday peaks respectively.

### 7.5 Junction Capacity Assessments - Modelling

- 7.5.1 AECOM previously reviewed a LinSig model of M1 Junction 10 to determine whether it accurately represented the existing layout. A number of concerns were raised which are listed below, along with PBA's response.
  - Some arms were not allocated radius values. A smaller radius (i.e. a tighter turn) results in a lower saturation flow. As appropriate radii were not allocated to some arms AECOM was concerned that the model may have over-estimated capacity on these arms. PBA have resolved this issue which AECOM can confirm.



- AECOM considered that the intercept and slope values for the Arm 4 give way approaches should ideally have been taken from an ARCADY model of the junction or fall in line with JCT guidelines if this was not available. For roundabout approaches AECOM consider that values representing a 'Give Way Controlled Left Turn' should have been used rather than 'Right turn at Signals'. These preferred values are an Intercept of 715 and a slope of 0.22 per lane. These values were not used within the model and it was recommended that they were changed. PBA ran the model with these intercept and slope values with the result of unrealistic queue lengths and unrealistic model behaviour. Therefore these values have not been used in the model re-run.
  - However, there is some confusion as this arm is coded as free flowing rather than give way, while the circulatory should be coded as free flowing rather than a give way approach. AECOM recommend that the coding is revised and revised model outputs are calculated. If the JCT intercept and slope values are not used within the model evidence should be provided to support those that are used (potentially in the form of a comparison between modelled and observed queue lengths).
  - The lane connector between Arm 4 lane 3 and Arm 2 lane 1 (southern circulatory) should be removed as this would involve vehicles merging from two lanes to one, which would be unlikely to occur in reality for safety reasons. PBA have resolved this issue so that traffic now moves from Arm 4 lane 3 to Arm 2 lane 2 only, which AECOM can confirm.
  - A number of the times allocated to connectors would result in unrealistically high link speeds. Alternatively, if speeds were allocated to the connectors the circulatory link lengths would need to be revised to accurately reflect their length, rather than using the default LinSig value of 345m. AECOM can confirm that the link lengths have been updated but a speed of 64kph has been applied to each. AECOM considers that this could be unrealistically high for a junction and recommends that it is reduced or evidence is provided to support its allocation.
  - Some connectors do not have a time or speed allocated to them. PBA have resolved this issue which AECOM can confirm, although reference should be made to the point above.
- 7.5.2 AECOM previously considered that the additional development trips were not included within the model accurately. Based on the flow spreadsheet provided by PBA alongside the TAA, AECOM consider that the flows have been included within the model accurately.
- 7.5.3 AECOM has reviewed the supplied LinSig model files and outputs and has found that the 2016 base model outputs do not match those stated within Table 8.2 of the TAA.
- 7.5.4 Some queue length information was provided within the appendices of the TA, however not all the time periods modelled were included within the data. The reasons for this were unclear. AECOM recommended that a calibration/validation of the base model was undertaken using queue length data by PBA to determine whether the model is reasonably reflecting observed traffic conditions. AECOM considers that this issue has not yet been addressed.
- 7.5.5 PBA have included the results from the updated LinSig model runs with the following commentary, within the TAA.
- *The results show that Junction 10 is anticipated to operate with significant levels of queuing on the northbound off-slip road and southern circulatory in the future years when background growth and committed development traffic are included, which Newlands Park development traffic adds to. However, PBA state that queuing traffic is not expected to reach the M1 mainline in the 2021 opening year.*
  - *The signalised circulatory node of the junction is able to filter traffic turning right to the M1 northbound on slip by using Airport Way as a gated entrance to the M1.*

- *Queuing on Airport Way is not expected to extend beyond Junction 10A or impact on the dedicated left turn lane towards M1 southbound, as Airport Way now includes for three lanes between Junction 10a and J10, one being dedicated to southbound M1 traffic.*
- *Following the 2021 opening of the proposed development, it is anticipated that queues on the northbound off slip are not expected to increase beyond 63 PCUs/lane, approximately 400m, leaving at least 250m of spare slip road before queues reach the mainline. Even with the addition of Power Court the 2021 PM queues only extend to 72 PCUs and the junction is predicted to operate within capacity during a match day Saturday peak hour.*
- *Whilst queuing does not extend back to the mainline or upstream junctions, opportunities available to gate traffic on Airport Way or within the development site through a monitoring programme have not yet been taken into account within the results presented above. There is also potential to prioritise the slip road over the circulatory during peak periods through real time queue monitoring.*
- *The 'with cumulative development' scenarios assume the absolute worst case scenario, being a Friday PM peak hour, where office staff are assumed to leave and leisure visitors arrive at the site. PBA considers that in reality, office users are more likely to leave earlier on a Friday, leisure visitors arrive later and that some office staff will visit the leisure facilities on foot. The Saturday peak scenario assumes a match day at the separate Power Court development in Central Luton.*

7.5.6 Based on these findings, PBA propose to mitigate the impact of additional proposed development traffic through travel demand management and peak spreading measures onsite, as opposed to physical works to any part of M1 Junction 10 or the surrounding mainline.

7.5.7 However, in addition to the remaining concerns regarding the coding of the model, that have been highlighted within this note, AECOM also raised concerns regarding the model outputs, in particular the significant queues predicted on the southern circulatory. In reality, in order to protect the operation of the roundabout circulatory this link would be operating with a Degree of Saturation value below 80%, which would require considerably more green time than is currently allocated, taking green time away from the M1 northbound off-slip approach. AECOM undertook a test using LinSig and found that if the southern circulatory queuing is protected then queuing on the M1 northbound off-slip could significantly increase and stretch back to the mainline carriageway.

7.5.8 An alternative approach to protect the southern circulatory could be to signalise the Airport Way approach to the M1 J10 gyratory. Signal timing priority could be such that queues which develop are on the approach to the junction rather exceeding the circulatory stacking space available. It should be noted that bullet point 2 above makes reference to 'gating the Airport Way approach', however AECOM are unclear how PBA expect the gating to occur on the current un-signalised approach.

7.5.9 This concern has not been addressed within the TAA and therefore it is considered outstanding by AECOM. The LinSig models should be updated to accurately reflect the layout of the junction and ensure that the operation of the southern circulatory is protected, upon which revised outputs should be presented for analysis. Until such time AECOM will not comment further on the model outputs presented within the TAA.

## **7.6 Junction Capacity Assessments – Merge / Diverge Assessment**

7.6.1 AECOM previously requested merge/diverge and slip road capacity assessments which PBA have partially completed.

7.6.2 The TEMPRO growth factors used and stated in Table 8.2 of the Addendum Report do not match those included within the traffic flows spreadsheet and whilst paragraph 8.5.15 of the TAA indicates that they have been taken from version 7.0 of TEMPRO, AECOM has matched the

values presented with those from version 6.2. AECOM requests clarification on this issue regarding TEMPRO factors in both the TAA and associated spreadsheet.

- 7.6.3 Regardless of the previous point, AECOM have checked the cumulative development merge provision assessments provided by PBA. Assessments of the diverge layouts, and slip road link capacities have not been provided. AECOM recommends assessments of the diverge and slip road capacity requirements be provided.
- 7.6.4 The merge assessments provided indicate that following cumulative (Newlands Park and Power Court) development, the existing merge layouts will not be consistent with those required to support the background growth and development proposals in all time periods in the 2021, 2026 or 2031 assessment years. Based on the assessments provided, to meet capacity requirements in the 2021 opening year, Type F merge layouts would be required consisting of 3 lanes upstream, two lane onslip with ghost island and single lane gain merge.

## 7.7 Mitigation

- 7.7.1 Due to AECOM's concerns regarding the model inputs and outputs it was previously recommended that some mitigation measures are identified and modelled by PBA to determine whether they are feasible and sufficient to ensure the junction operates within capacity following development.
- 7.7.2 PBA responded by citing HE's requirement to minimise the level of physical mitigation and assess potential alterations to the local road network as an alternative to making alterations to the SRN. PBA therefore propose to mitigate the impact of the development through travel demand management and peak spreading onsite. It is recommended that further details be provided of the measures envisaged including reassurance that the measures proposed are realistic, effective, can be achieved/enforced and that the measures will be accepted by all stakeholders.
- 7.7.3 AECOM considers that M1 Junction 10 is predicted to be severely congested by 2021, which is predicted to be exacerbated by the proposed Newlands Park development. AECOM would welcome the use of demand management and peak spreading to reduce the impact of the proposed development on the strategic road network at peak times and further information should be provided to demonstrate how this impact will be reduced and how the junction is predicted to operate with development following the implementation of these measures. In event the development is still predicted to result in an adverse impact to SRN consideration should be given additional mitigation measures that may be required to support the development.
- 7.7.4 It is reiterated that AECOM are aware of other developments that are coming forward within the vicinity of M1 Junction 10, which could have an impact on the operation of the junction. AECOM previously suggested that consideration could be given to undertaking a cumulative assessment of the impact of the relevant developments to determine the overall operation of the junction, to determine what mitigation measures may need to be provided to support development coming forward within the vicinity of the junction and consider how the funding could be secured to support the provision of an improvement scheme. Depending on what type of scheme may be required, Newlands Park could potentially make a suitable financial contribution to the scheme.
- 7.7.5 PBA has undertaken cumulative modelling scenarios and some further details regarding how the flow scenarios were established is provided. Paragraph 8.6.3 of the TAA states that TEMPRO version 7.0 growth factors were used, whereas the associated supporting spreadsheet and previous information stated that version 6.2 was used. The approach taken should be clarified by PBA. Furthermore, it is indicated that changes in flows expected from the committed A5-M1 link have been included within the forecast year flow scenarios. It is unclear from the spreadsheets provided what changes have been made to reflect this. It is recommended that this is explained further and justification for the flow changes are provided.

## 8 Conclusion

- 8.1.1 This TN has been prepared by AECOM on behalf of HE to document a review of a Transport Assessment Addendum Report, associated with proposed mixed use development at Newlands Park, Luton.
- 8.1.2 Based upon the spreadsheet provided by PBA the proposed development could result in an additional 598, 819 and 852 PCU trips in the AM, PM and Saturday peaks respectively at M1 J10. Additional trips of this magnitude can be expected to have an impact on the operation of the junction. Based upon the capacity assessments presented to date the M1 J10 gyratory is predicted to be over capacity in the 2021 opening year adopted.
- 8.1.3 AECOM has raised a number of concerns and recommendations throughout this note, which are underlined for ease of reference. It is recommended that these are addressed by PBA and a revision is prepared to fully assess the impact of the proposed development on the operation of the SRN.
- 8.1.4 The following bullet points summarise the key issues arising from the TAA review:
- AECOM recommends that details are provided of the parking controls that would be in place for retail visitors to the Newlands Park site in light of the prospect of unofficial park and ride trips utilising the site to travel to Luton Town Centre and potentially Power Court.
  - AECOM recommends that more information on park and ride aspirations for the area is made available as soon as possible, so the impact that these extra trips will have on the SRN is accurately assessed. Details regarding whether there would be a requirement to submit a further planning application for this should also be provided.
  - It is acknowledged that a scope of assessment which did not include M1 Junction 11 was previously agreed in an AECOM Scoping Note review, however it is recommended that consideration is given to undertaking this analysis as the impact of the development is now better understood.
  - There are a number of outstanding concerns regarding the inputs and outputs from the LinSig modelling at M1 Junction 10. AECOM consider that these should be resolved before further comments are made on the modelling outputs and conclusions are drawn.
  - There are discrepancies between the TEMPRO values used throughout the analysis and some confusion as to which version (6.2 or 7.0) has been used. This should be addressed and consistency between the values should be maintained throughout.
  - Only merge assessments have been provided at M1 Junctions 10 and 11, diverge and slip road link capacity assessments should also be provided.
  - PBA propose to mitigate the impact of the development at M1 Junction 10 through demand management and peak spreading measures. Further details should be provided of the measures envisaged including reassurance that the measures proposed are realistic, effective, can be achieved/enforced and that the measures will be accepted by all stakeholders.
  - Further information should be provided to demonstrate how these measures will reduce the impact and how the junction is predicted to operate following the implementation of these measures. In event the development is still predicted to result in an adverse impact to SRN consideration should be given additional mitigation measures that may be required to support the development.

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: Shopping Centre and Office Campus M1 J10, Newlands Park, Luton  
**Date:** 07 February 2017 10:54:19

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[REDACTED]  
Further to our telephone conversation I shall be most grateful if you will review and provide a response to the comments [REDACTED] has tabled.  
Please charge your time to "ad hoc".

Regards

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**From:** [REDACTED]  
**Sent:** 07 February 2017 10:16  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Shopping Centre and Office Campus M1 J10, Newlands Park, Luton

We are very concerned that with a development of the scale of the proposed shopping centre and office campus at M1 J10, Newlands Park, Luton, Highways England are not insisting on the use of the Saturn model that has been produced for this purpose. This is not consistent with Highways England approach on other proposed developments in the area where you have insisted that the model be used and even more surprising given that the evidence for the Luton Local Plan shows capacity issues in future years at J10, J11 and J11a and on the M1.

Our further comments to your email are in red below.

Kind regards

[REDACTED]  
Director  
for Transport Planning Practice Ltd  
tel: [REDACTED]  
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---

**From:** [REDACTED]  
**Sent:** 14 November 2016 11:58  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Shopping Centre and Office Campus M1 J10, Newlands Park, Luton

Dear [REDACTED],

Thank you for your email regarding the development at Newlands Park. Highways England recognise that you have transport concerns regarding the Transport Assessment associated with the development, which you have raised within the email below. I have addressed each of your points in turn, referring to each point number for ease of reference.

1) The planning application has been submitted with a supporting Transport Assessment (TA). Included within the TA is a manual assessment of the potential impact of the proposed development on the highway network. Highways England's role is to assess what is presented to them and determine whether it is sufficient and adequate to assess the impact of the development on the strategic

road network. Highways England considered that the type of assessment presented within the TA in this instance is acceptable. Given that the type of assessment present is considered appropriate making a request to the developer to adopt an alternative approach (for example a SATURN model) this could be considered to be unreasonable, particularly where this could result in additional time and expense.

We are very concerned that with a development of the scale of the shopping centre and office campus at M1 J10, Newlands Park, Luton, Highways England are not insisting on the use of the Saturn model that has been produced for this purpose. This is not consistent with Highways England approach on other proposed developments in the area where you have insisted that the model be used and even more surprising given that the evidence for the Luton Local Plan shows capacity issues in future years at J10, J11 and J11a and on the M1.

2) Traffic re-assigned as a result of the developer's proposals is restricted to the local road network and is not applied to strategic network trips. Therefore Highways England did not consider this further.

We are not sure that this will be the case in practice traffic will reroute around the local area including M1 junction10. This highlights the importance of using the model to properly analyse the impacts of the proposed development.

3) Highways England has commented on the potential impacts of the development at M1 Junction 10 and are awaiting a response from the developer's consultants. This is therefore considered to be unresolved at this stage.

Please could you provide an update on this issue.

4) Unless the operation of a local road network junction could have an adverse impact on the operation of the strategic road network, Highways England do not comment on the operation of these junctions.

Without using the model to analyse the impacts of the development how can Highways England be sure that there will be no rerouting onto the strategic roads as a result of the issues on the local roads.

5 – 9) These points primarily relate to issues for the Local Planning Authority. Highways England would express a preference for development in sustainable locations or locations that can be made sustainable, Highways England also recognise that alternative sustainable locations may not always be available. Highways England also welcome the provision of sustainable modes of transport, and expect this aspect to be addressed in Travel Plans associated with individual developments.

10) The methodology used within the TA to calculate the required parking provision is considered reasonable. It is recommended however that consideration be given to managing the overall parking provision should the actual office accumulation exceed capacity.

The method used within the TA shows that the development has not provided sufficient car parking to meet the estimated demand. Therefore surely Highways England should be objecting on these grounds as well as those outlined above.

I hope this helps to address some of your concerns. Please let me know if you have any further questions.

Unfortunately we still have significant concerns with regard to the proposed development as noted above.

Regards,

[Redacted Signature]

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

Tel: [Redacted]

Web: <http://www.highways.gov.uk>

GTN: [Redacted]

---

**From:** [REDACTED]  
**Sent:** 26 October 2016 11:26  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Shopping Centre and Office Campus M1 J10, Newlands Park, Luton

I have been trying to get in touch with you to discuss our email of 10<sup>th</sup> October to [REDACTED] below. However the switch board were not able to put me through and the direct line I have for you does not seem to be correct. Therefore I would be grateful if you could let me have your current direct line and also give me a call to discuss the email.

Kind regards

[REDACTED]  
Director  
for Transport Planning Practice Ltd  
tel: [REDACTED]  
dir: [REDACTED]  
mob: [REDACTED]  
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---

**From:** [REDACTED]  
**Sent:** 10 October 2016 11:38  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Shopping Centre and Office Campus M1 J10, Newlands Park, Luton

With reference to our telephone conversation regarding the proposed shopping centre and office campus at M1 junction 10, known as the Newlands Park development, we thought that it would be helpful to outline our concerns with regards to the Transport Assessment that has recently been submitted. The proposed development contains approximately.

- Office campus **452,000 sqft** (i.e sufficient space for approximately 3,500 employees).
- Retail shopping centre **401,000 sqft.**
- Leisure (cinemas, bowling alleys etc) **172,000 sqft.**
- Food and beverage (restaurants etc) **91,500sqft.**
- Hotel **350** beds (we do not know if this has associated conference facilities).
- Car parking **3,600** spaces (1,900 proposed for the retail/ leisure and 1,700 spaces for the office/ hotel).
- Total floor area excluding hotel approximately **1,112,000 sqft** i.e. over a million sqft of commercial space.

We understand that the Newlands Park development at M1 junction 10 is being promoted to raise money to fund a new football stadium in Luton town centre adjacent to the conservation area, station and shopping mall.

Our transport concerns are as follows

1. The Transport Assessment has not used the strategic Saturn model that has been developed by both Luton Borough Council and Central Bedfordshire Council specifically to analyse the Local Plans and consider large scale developments in the area. Instead a manual assessment has been undertaken which does not take account of the Local Plan proposals.
2. A manual assessment has also been undertaken for traffic that will be reassigned as a result the development's proposals to change the road network around junction 10 and junction 10a. Again the strategic transport model which has



- been developed for this purpose should have been used.
3. The capacity analysis at junction 10 is unclear and where there are adverse impacts there are no solutions provided or the developers argue that the adverse impacts are acceptable.
  4. There are other impacts on local junctions which they recognise as adverse but again no solutions have been offered.
  5. The site is poorly located with respect to the local public transport network, particularly given the very large scale of the development and the proposed town centre uses.
  6. The site is poorly located with respect to the existing town centre.
  7. The site is poorly located with respect to the existing residential areas.
  8. 5, 6 and 7 above will make it difficult to encourage sustainable modes of transport.
  9. We believe that the current Local Plan which maintains town centre uses in the town centre and locates the football stadium at junction 10 is a far more sensible proposal.
  10. Even though 3,600 car parking spaces are proposed we are concerned that this will not be sufficient. For instance the office can be expected to employ around 3,500 people but there may only be around 1,200 car parking spaces available if 300 of the 350 hotel rooms were to be occupied at any one time. This amounts to just one space per 2.5 employees. Indeed the Transport Assessment predicts a modal split of 70% car driver to the office campus which would amount to 2,450 cars for which here would only be 1,200 spaces.

We would be grateful if you could reassure us that Highways England is aware of all of the above issues with the proposed Shopping Centre and Office Campus development at M1 junction 10 which exceeds one million square feet.

Although this email does not concern the associated football stadium in the town centre it is worth noting that no capacity analysis of the road network has been undertaken with regards to this. The argument that has been put forward is that the football matches and other events at the stadium should be considered as untypical of events. We do not agree with this approach because football matches will take place 40 or 50 times a year and to make proper and economic use of a modern stadium it should also be in regular use for other events.

We understand that Highways England has commissioned consultants to review the Transport Assessment and we would welcome the opportunity to discuss our concerns with both yourselves and your consultants.

Thank you for taking the time to speak to us and we look forward to working with you with regards to the above issues.

Kind regards

[Redacted signature]

Director  
for Transport Planning Practice Ltd

tel: [Redacted]

dir: [Redacted]

mob: [Redacted]

web: [www.tppweb.co.uk](http://www.tppweb.co.uk)

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Shopping Centre and Office Campus M1 J10, Newlands Park, Luton  
**Date:** 20 February 2017 11:24:07

---

Dear [REDACTED]

Thank you for your email and for raising the concerns you have. During the following email I will try and address these from Highways England's point of view, although I think some of the points may require some input from Luton Borough Council. I would also like to note that at this stage the status of the Newlands Park planning application has not been resolved and a number of issues remain unresolved, some of which may relate to some of your concerns.

Your primary concern appears to be the lack of use of a SATURN model to assess the potential impact of the Newlands Park development. As raised within our previous email, if Highways England consider that the assessment presented within a supporting Transport Assessment (TA) to be sufficient and adequate to assess the impact of the development on the strategic road network, then it could be considered unreasonable to request an alternative assessment, particularly where this could result in additional time and expense.

Furthermore, the SATURN model that covers the Luton area, the Central Bedfordshire and Luton Transport Model (CBLTM), is currently undergoing an update to model a revised base year. The updated model is not yet available for use and the old version of the model has a base year of 2009, which may not be considered appropriate for modelling the impact of development in 2017.

Therefore, the absence of a suitable model at this stage reinforced Highways England's belief that the approach taken by the developers of Newland's Park within their TA is reasonable.

By undertaking a spreadsheet model approach to trip distribution Highways England acknowledge that the potential re-assignment of existing trips on the network as a result of proposed development traffic will not be assessed. It is acknowledged that there is the possibility for re-assignment away from congested local roads to the strategic road network, however the lack of consideration of re-assigned trips is still considered to be a robust assessment on the SRN and is therefore considered reasonable by HE and likely to be more onerous on the developer.

HE/AECOM are still in discussion with the developer regarding the impact of the proposed development at M1 Junction 10, which includes some questions about parking provision, with a number of aspects still being unresolved.

I hope this addresses the concerns you raised throughout your email where possible. I hope you recognise that this is an ongoing process between the developers, Luton Borough Council and Highways England.

Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 07 February 2017 10:16  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Shopping Centre and Office Campus M1 J10, Newlands Park, Luton

We are very concerned that with a development of the scale of the proposed shopping centre and office campus at M1 J10, Newlands Park, Luton, Highways England are not insisting on the use of the Saturn model that has been produced for this purpose. This

is not consistent with Highways England approach on other proposed developments in the area where you have insisted that the model be used and even more surprising given that the evidence for the Luton Local Plan shows capacity issues in future years at J10, J11 and J11a and on the M1.

Our further comments to your email are in red below.

Kind regards

[Redacted]

Director  
for Transport Planning Practice Ltd

tel: [Redacted]

dir: [Redacted]

mob: [Redacted]

web: [www.tppweb.co.uk](http://www.tppweb.co.uk)

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---

**From:** [Redacted]

**Sent:** 14 November 2016 11:58

**To:** [Redacted]

**Cc:** [Redacted]

**Subject:** RE: Shopping Centre and Office Campus M1 J10, Newlands Park, Luton

Dear [Redacted],

Thank you for your email regarding the development at Newlands Park. Highways England recognise that you have transport concerns regarding the Transport Assessment associated with the development, which you have raised within the email below. I have addressed each of your points in turn, referring to each point number for ease of reference.

1) The planning application has been submitted with a supporting Transport Assessment (TA). Included within the TA is a manual assessment of the potential impact of the proposed development on the highway network. Highways England's role is to assess what is presented to them and determine whether it is sufficient and adequate to assess the impact of the development on the strategic road network. Highways England considered that the type of assessment presented within the TA in this instance is acceptable. Given that the type of assessment present is considered appropriate making a request to the developer to adopt an alternative approach (for example a SATURN model) this could be considered to be unreasonable, particularly where this could result in additional time and expense.

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2) Traffic re-assigned as a result of the developer's proposals is restricted to the local road network and is not applied to strategic network trips. Therefore Highways England did not consider this further.

We are not sure that this will be the case in practice traffic will reroute around the local area including M1 junction10. This highlights the importance of using the model to properly analyse the impacts of the proposed development.

3) Highways England has commented on the potential impacts of the development

at M1 Junction 10 and are awaiting a response from the developer's consultants. This is therefore considered to be unresolved at this stage.

Please could you provide an update on this issue.

4) Unless the operation of a local road network junction could have an adverse impact on the operation of the strategic road network, Highways England do not comment on the operation of these junctions.

Without using the model to analyse the impacts of the development how can Highways England be sure that there will be no rerouting onto the strategic roads as a result of the issues on the local roads.

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I hope this helps to address some of your concerns. Please let me know if you have any further questions.

Unfortunately we still have significant concerns with regard to the proposed development as noted above.

Regards,

[Redacted]

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

Tel: [Redacted]

Web: <http://www.highways.gov.uk>

GTN: [Redacted]

---

**From:** [Redacted]

**Sent:** 26 October 2016 11:26

**To:** [Redacted]

**Cc:** [Redacted]

**Subject:** RE: Shopping Centre and Office Campus M1 J10, Newlands Park, Luton

[Redacted]

I have been trying to get in touch with you to discuss our email of 10<sup>th</sup> October to [Redacted] below. However the switch board were not able to put me through and the direct line I have for you does not seem to be correct. Therefore I would be grateful if you could let me have your current direct line and also give me a call to discuss the email.

Kind regards

[Redacted]

Director  
for Transport Planning Practice Ltd

tel: [Redacted]

dir: [Redacted]

mob: [Redacted]

web: [www.tppweb.co.uk](http://www.tppweb.co.uk)

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---

**From:** [REDACTED]

**Sent:** 10 October 2016 11:38

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Shopping Centre and Office Campus M1 J10, Newlands Park, Luton

With reference to our telephone conversation regarding the proposed shopping centre and office campus at M1 junction 10, known as the Newlands Park development, we thought that it would be helpful to outline our concerns with regards to the Transport Assessment that has recently been submitted. The proposed development contains approximately.

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We understand that Highways England has commissioned consultants to review the Transport Assessment and we would welcome the opportunity to discuss our concerns with both yourselves and your consultants.

Thank you for taking the time to speak to us and we look forward to working with you with regards to the above issues.

Kind regards

[Redacted]

Director  
for Transport Planning Practice Ltd

tel: [Redacted]

dir: [Redacted]

mob: [Redacted]

web: [www.tppweb.co.uk](http://www.tppweb.co.uk)

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**[england](http://www.gov.uk/government/organisations/highways-england) | [info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)**

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Planning application 16/001401/OUTEIA land Adjacent to Junction 10 - M1 and Planning application 16/01400/OUTEIS - Power Court - Luton  
**Date:** 13 March 2017 08:47:29  
**Attachments:** [RE LTEC Planning Applications - Addendum Reports.msg](#)  
[image001.jpg](#)

---

[REDACTED]  
AECOM were copied in on Technical Notes on both the above planning application. Following our meeting at these offices last Tuesday 7 March I provided hard copy of email communication from [REDACTED] in which he enquired on the progress of the application(s) as Luton Borough Council were keen to see the Football Stadium delivered.

Can you please provide a CTO to review this latest information provided (unless already in hand). Highways England have a recommendation not to determine which expires 31 March 2017. Highways England would wish to complete its work and sign off the application before the expiry date. Can I ask if you can assist in this matter. I am hopeful AECOM/Highways England can meet the delivery date.

Regards

[REDACTED]  
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

**Tel:** [REDACTED]

**Web:** <http://www.highways.gov.uk>

**GTN:** [REDACTED]

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Customer Contact Centre is available 24/7 on 0300 123 5000 or [info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: LTFC Planning Applications - Addendum Reports  
**Date:** 02 March 2017 10:56:47  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Dear [REDACTED]  
Please see a link below which should enable you to download our Transport Assessment Addendum Reports (02) relating to Highways England queries and clarifications sought on PBA's first Addendum Reports for Newlands park and Power Court.

<http://SimpleSend.it/d/f1621049ac6e455f8a1243f1ba0af065f6b5233099114a>

The PBA responses provided are structured in accordance with the order of the comments received for clarity and I hope are self-explanatory. However and as ever, if any more information is required, then please do not hesitate to come back to me. We're very keen to close out the comments ASAP so please come back on individual points as and when necessary, and we will do our utmost to respond promptly by phone in first instance or by email if necessary.

Kind regards,  
[REDACTED]

Principal Transport Planner  
For and on behalf of Peter Brett Associates LLP - [Cambridge](#)

  t [REDACTED]  
m [REDACTED]  
 e [REDACTED]  
w [peterbrett.com](http://peterbrett.com)

---

**From:** [REDACTED]  
**Sent:** 21 December 2016 11:11  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** LTFC Planning Applications - Addendum Reports

Dear all,  
Please see a link below which should enable you to download our Transport Assessment Addendum Reports relating to Highways England queries and clarifications sought on the original Transport Assessments for Newlands park and Power Court.

<http://SimpleSend.it/d/f237b403af384ec1be3e095334095e051c91f80a1b944d>

The PBA responses provided are structured in accordance with the order of the comments received for clarity and I hope are self-explanatory. However and as ever, if any more information is required, then please do not hesitate to come back to me.






Happy Christmas to all.

Kind regards,

[Redacted]

Senior Associate Transport Planner

For and on behalf of Peter Brett Associates LLP - [Cambridge](#)

  t [Redacted]  
m [Redacted]  
 e [Redacted]  
w [peterbrett.com](http://peterbrett.com)



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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Planning Applications Power Court & Newlands Park  
**Date:** 20 March 2017 10:45:29  
**Attachments:** [RE Power Court Newlands Park - Luton.msg](#)  
[image001.jpg](#)

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Good morning [REDACTED]

I trust you had a restful break.

I am replying to [REDACTED] suggesting we defer the meeting till after HE receive comments from [REDACTED] on Power Court. I am recommending to the LPA they do not give permission until 11 April 2017 unless [REDACTED] **suggests extending the date.**

AECOM will be providing a fee proposal to review the latest Addendum on Newlands Park. Can you please give some thought when you expect this application can be signed off as I will be recommending non determination as work is ongoing. Your best judgement on a reasonable date when we can expect to sign off the application would be appreciated. PBA will require to respond to any AECOM comments. That is very much dependant if AECOM are recommending highway improvements which will have to be agreed with the developer and conditioned. Highways England's preference has always been development trips are suppressed at source.

The current recommendations for both applications expires on 31 March 2017. I will wait on you and [REDACTED] to get back to me before I formally respond to [REDACTED] regarding a meeting.

Regards

[REDACTED]

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

**Tel:** + [REDACTED]

**Web:** <http://www.highways.gov.uk>

**GTN:** [REDACTED]

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Customer Contact Centre is available 24/7 on 0300 123 5000 or [info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Power Court & Newlands Park - Luton  
**Date:** 16 March 2017 10:01:23  
**Attachments:** [image001.jpg](#)  
[image004.jpg](#)  
[image005.jpg](#)  
[image006.jpg](#)

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Hi [REDACTED],

Further to your email and our subsequent telephone conversation, as agreed we would like to set up a meeting with you and Aecom to review the latest position and agree a way forward before we finalise our response to the club/PBA. Can you indicate your availability to meet in Luton on the 27<sup>th</sup> or 28<sup>th</sup> March.

In the meantime, please copy me in on any further responses you receive from either PBA and Aecom.

Best regards,

[REDACTED]

[REDACTED]

Highway Development & Sustainable Travel Manager  
Place & Infrastructure  
Luton Borough Council  
Town Hall  
Luton LU1 2BQ  
Email: [REDACTED]  
Tel: [REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 February 2017 11:10  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Power Court & Newlands Park - Luton

Rod,

The Technical Notes were forwarded to PBA – Newlands Park on 6/02/17 and Power Court yesterday 13/02/17. Can I suggest we wait on PBA response and determine what work if any is required before we convene a meeting.

I expect PBA will copy you on their comments which will give an indication on what work is outstanding.

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 February 2017 10:54  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Power Court & Newlands Park - Luton

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Hi [REDACTED]

Thanks for these notes. I will ask [REDACTED] to review them and we'll get back to you with any comments. It might be beneficial for us to meet with you and Aecom at some point to discuss and agree any outstanding issues before we respond formally to the planners.

Can I ask if you've sent the notes to PBA or, if not, when you intend to?

Best regards,

[REDACTED]

[REDACTED]

Highway Development & Sustainable Travel Manager

Place & Infrastructure

Luton Borough Council

Town Hall

Luton LU1 2BQ

Email: [REDACTED]

Tel: [REDACTED]

---

**From** [REDACTED]

**Sent:** 14 February 2017 10:47

**To:** [REDACTED]

**Subject:** Power Court & Newlands Park - Luton

CONFIDENTIAL

[REDACTED]

Please find AECOM Technical notes in response to Transport Assessment Addendum Reports relating to Highways England queries and clarifications sought on the original Transport Assessments for Newlands Park and Power Court copied to you via email from PBA dated 21 December 2016.

Can I ask if you will kindly provide a brief statement regarding Luton Borough Council addressing Parking issues with regard to Newlands Park. HE have commented on parking, however LBC have standards which will apply when assessing this application.

Regards

[REDACTED]

[REDACTED]

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

**Tel:** [REDACTED]

Web: <http://www.highways.gov.uk>

GTN: [REDACTED]

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