

Local Transport Plan

Consultation report

December 2020

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A. Responses to the on-line questionnaire

1 Introduction

Between 18th September and 16th November 2020, the Council undertook a community and stakeholder consultation on its draft Local Transport Plan (LTP) covering the period 2020-2040; the LTP and supporting documents were available to download on the Councils consultation site. In planning this consultation, it was considered inappropriate to undertake public exhibitions and meetings, so an offer was made to hold on-line meetings with stakeholders and 'hard to reach' residents such as young and elderly people and people with disabilities.

Articles about the draft LTP were included in e-Luton, a digital update of local and council news that goes out to over 32,000 subscribers every month and in the Councils Voluntary and Community Services weekly newsletter circulated to charities and disability groups. Other interested local stakeholders were emailed a link to the consultation documents, together with use of various Social Media channels.

This report summarises the responses to the consultation. The responses can broadly be grouped into three categories:

- i) Responses submitted via the on-line questionnaire
- ii) Written responses about the Local Transport Plan
- iii) Written responses about the Strategic Environmental Assessment of the Local Transport Plan

The next three chapters of this report summarise the responses received to each of the above forms of consultation. Full details of the responses received are included in the Appendices.

In addition to this one-off consultation on the LTP, since 2014 Luton, along with 112 other Councils, has subscribed to the National Highways and Transport (NHT) survey. This is a 21 question survey undertaken with local residents to determine public satisfaction with transport and transport services in the local area, including:

- Walking and cycling;
- Public transport;
- Congestion;
- Road safety; and
- Highway maintenance.

Luton's 2019 results of public satisfaction with these services, trends from the previous year and the results for its 'peer' group of council areas with similar characteristics were summarised in the Evidence Base report, one of the LTP supporting documents. The annual NHT survey results are used as an indicator of which of the aforementioned service areas need improving most in Luton and which service areas have most potential to improve. The results include comparisons by local authority type and geographical area. This information can, therefore, provide a very customer focused driven approach to transport improvements. The Key Benchmark Indicators (KBIs) provide overall headline results from the NHT surveys by theme and for highways and transport as a whole (both locally and nationally)..

Luton also subscribes to the NHT's CQC Efficiency Network, (Customer Quality Cost) where the three performance legs are inextricably linked and place competing demands on one another. It is only by considering the interaction of all three together that optimum decisions for the future can be made on a measurable and demonstrable basis.

2 Responses to the on-line questionnaire

2.1 Background

The on-line questionnaire principally asked a series of questions about the strategic priorities set out in Chapter 7 of the draft LTP. Given the draft LTP recognised that the onset of Covid19 in the UK in March 2020 could present a longer term opportunity for changing the way people travel, the questionnaire also included a number of questions about how the local community travelled for different types of journey both pre-Covid19, during the first Lockdown period in spring 2020 and since restrictions were lifted in June/July.

2.2 Strategic transport priorities

The on-line questionnaire principally asked a series of questions about the strategic priorities set out in Chapter 7 of the LTP. Analysis of responses to all of the questions is included in Appendix A, but the main points can be summarised as follows:

- More than 2/3 of respondents agreed with our approach to encourage cycling and walking.
- In terms of reducing carbon emissions, actions to encourage more active travel and public transport use together with measures to reduce traffic around schools received greatest support, and discouraging cars from the town centre and promoting the benefits of shared transport got least support.
- In terms of other benefits of encouraging active travel, greatest support was for people feeling safer/more relaxed and improved air quality and less noise.
- In terms of improving public transport, providing bus services to key employment sites received the highest levels of support, with improved timetable/fare information and integrated ticketing with other forms of transport only receiving moderate support.
- Using the Workplace Parking Levy to fund bus service improvements got least support.
- In terms of the 'shared facilities' associated with mobility hubs, proximity to a bus stop and nearby parking for cycles/electric scooters received greatest levels of support, and priority parking for car club or car share services receiving least support.

2.3 How people travel

The following Tables compare the changes that took place during for different types of journey both pre-Covid19, during the first Lockdown period in spring 2020 and since restrictions were lifted in June/July. This can be used to predict the extent of return to a pre-covid norm, considering mode of travel together with the length and frequency of trip. Note that the figures below exclude the number of people who did not respond to these questions, but those numbers were generally low (between 2 and 4 of the 105 respondents) although the number not responding did double in lockdown/post-lockdown periods.

Mode of Travel for different trips

	Pre-Covid 19				During Lockdown				After restrictions			
	<u>work</u>	<u>food</u> <u>shop</u>	<u>other</u> <u>shop</u>	<u>social</u>	<u>work</u>	<u>food</u> <u>shop</u>	<u>other</u> <u>shop</u>	<u>social</u>	<u>work</u>	<u>food</u> <u>shop</u>	<u>other</u> <u>shop</u>	<u>social</u>
Car	45	75	59	60	40	66	39	34	35	71	48	49
Carshare	1	1	2	3	1	1	1	2	2	1	2	3
Train	11	1	3	13	2	0	2	3	7	0	3	4
Bus	12	6	14	9	1	0	2	1	2	1	4	1
Taxi	1	3	0	1	0	2	0	1	0	3	1	1
Cycle	4	0	3	2	5	2	1	2	2	1	2	2
Walk	5	2	15	10	4	18	17	21	5	15	17	17
Other	6	1	2	2	5	3	5	2	4	3	4	4
Didn't travel	17	0	5	3	44	11	36	36	45	8	22	22

The key messages that can be drawn from these tables, that are likely to influence the way we travel, certainly in the short term, can be summarised as follows:

- More than doubling of the number of people that did not travel for work during the lockdown, which was largely sustained once restrictions were eased.
- The greatest impacts in terms of travel to work by different modes during lockdown were reductions in those who travelled by train or bus; however both train and bus travel have only partially recovered to pre-covid levels. We acknowledge that bus travel particularly will take longer to recover.
- Little difference in the number of people travelling for essential shopping (food/medicine) or their mode of travel pre-covid, during lockdown, or once restrictions were eased.
- A significant reduction in non-essential shopping and leisure/social trips during lockdown compared to pre-covid levels with the greatest impact on car travel, with an equivalent significant increase in those that did not travel; however once restrictions were eased levels of trip making increased to about half of the pre-covid norm.

Length of trip

	Pre-Covid 19				During Lockdown				After restrictions			
	<u>work</u>	<u>food shop</u>	<u>other shop</u>	<u>social</u>	<u>work</u>	<u>food shop</u>	<u>other shop</u>	<u>social</u>	<u>work</u>	<u>food shop</u>	<u>other shop</u>	<u>social</u>
< 2 miles	16	52	26	25	44	58	55	51	39	55	38	48
2-5 miles	29	38	36	32	12	32	19	15	13	36	26	21
5-10 miles	8	8	16	12	6	7	9	10	5	7	12	12
>10 miles	37	5	22	33	22	4	10	19	29	3	19	24

The key messages that can be drawn from these tables, that are likely to influence the way we travel, certainly in the short term, can be summarised as follows:

- The length of journeys to work significantly reduced during lockdown and largely remained at this level once restrictions were eased.
- There was little difference in the length of journeys for essential shopping during lockdown or once restrictions were eased when compared with pre-covid levels.
- There was a doubling in the number of short (or no) journeys for non-essential shopping and leisure/social trips during lockdown; this recovered once restrictions were eased to about two-thirds of pre-covid levels.

Frequency of Trip

	Pre-Covid 19				During Lockdown				After restrictions			
	<u>work</u>	<u>food shop</u>	<u>other shop</u>	<u>social</u>	<u>work</u>	<u>food shop</u>	<u>other shop</u>	<u>social</u>	<u>work</u>	<u>food shop</u>	<u>other shop</u>	<u>social</u>
>Once/week	73	30	8	35	36	15	4	13	46	26	9	22
Once/week	2	62	13	21	4	52	3	12	6	52	6	26
Once/fortnight	1	5	22	14	1	13	6	4	3	10	19	5
Less often	18	5	58	33	53	21	85	71	38	15	69	47

The Key messages that can be drawn from these tables, that are likely to influence the way we travel, certainly in the short term, can be summarised as follows:

- Half the people travelled to work less than once a fortnight, and only increased marginally once restrictions were eased.
- The frequency people travelled for essential shopping approximately halved during lockdown, with those who shopped a few times a week only doing so once a week, and those who shopped once a week only shopping once a fortnight or less. Once restrictions were lifted they reverted to pre-covid19 levels.

- The frequency people made non-essential shopping trips and leisure/social trips reduced to less than once a fortnight during Lockdown but has not fully recovered to pre-Covid19 levels. However there was a tendency for non-essential shopping trips to recover more than that for leisure and social trips.

Travel to school

Of the 105 respondents, only 15 had school-aged children, and of these 6 walked and 5 were driven to school; the remainder used public transport of some form. However only two respondents said their child continued to go to school during lockdown.

2.4 Other questions

Respondents were also asked for their journeys overall, whether they agreed or disagreed with a number of statements about use of public transport, of which:

- About 43% disagreed satisfactory measures were in place to protect bus/train users whereas about a third agreed with this statement
- About 46% disagreed they felt safe using public transport whereas just over a third agreed with this statement, and almost two thirds said they would only use public transport if further safety measures were introduced
- 80% agreed that hand sanitiser should be available on public transport and at stations/bus stops.

Finally the questionnaire asked a number of standard demographic questions, details of which are included in Appendix A.

3 Written responses

In addition to the on-line questionnaire, officers emailed a link to the LTP and supporting documents to key stakeholders with an interest in transport as follows:

- National transport bodies, including Highways England and Network Rail;
- Local public transport providers including Arriva The Shires, Centrebus and Grant Palmer, together with Govia Thameslink Railway and East Midlands Railways;
- London Luton Airport Limited and the airport operator;
- England's Economic Heartland and neighbouring local Councils;
- SEMLEP and the local Chamber of Commerce who support local businesses; and
- Charities and Voluntary Groups, including Luton Visually Impaired People group.

Written responses were received from England's Economic Heartland (EEH), Hertfordshire County Council (HCC) and North Hertfordshire District Council (NHDC). Many of these responses agreed with the Councils strategic transport priorities, although they did make some points where they felt the document needed clarification or could be improved, including the need to collaborate with neighbouring Councils to improve connections into their areas. In the context of collaborative working:

- EEH stated they would continue to share best practice on decarbonising transport and effective deployment of active travel and will continue to support their partners views of continuing to stop longer distance inter-city trains at Luton or Luton Airport Parkway station.
- HCC stated that their Enhanced Quality Partnership with bus operators could form a useful starting point for improving bus service in Luton and also that they are keen to share details of their Hertfordshire Living Lab project, which uses a range of technologies to provide experimental services to real customers and communities, to accelerate learning towards a vision for smart towns and cities.
- NHDC mentioned that their emerging Transport Strategy also supports proposals for a 'Sustainable Spine' with a focus on enhanced public transport connectivity between Luton, Hitchin, Letchworth, Baldock and Stevenage and that they are also developing an LCWIP that could improve cycling connectivity between Luton and Hitchin.

The Council also offered to arrange a webinar that these stakeholders could attend or to provide a presentation to meetings of these individual organisations. Presentations were given to the Central Bedfordshire and Luton Joint Local Access Forum (JLAF) on 20th October and to a local forum of rail users on 27th October. The JLAF subsequently submitted their comments by email and the Bedfordshire and Hertfordshire branch of Railfuture submitted a written response.

The Tables in the remainder of this chapter summarise these comments and propose how the document should be amended to address the points raised in those responses.

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	Key point in response letter	Proposed amendments to Local Transport Plan
Central Bedfordshire and Luton Joint Local Access Forum (JLAF)	It was noted that in most areas of the town there were low levels of walking apart from the River Lea Valley and the low density housing/population areas in the east of the town. Much of the walking in the east appeared to relate to the good network of paths going out into the Hertfordshire countryside.	No amendments required.
	It is crucial that previous work to improve access north of Luton to and from the M1 and A6 link road is maintained and other areas of the town draw on this essential link between town and countryside.	Add the following sentence to the supporting text to Policy 3 (Public Rights of Way) in section 10.2, after last para in LH col on p66: “In this context we will seek to improve connectivity between other areas of Luton and the surrounding countryside.”
	It was noted that, in common with most LTPs, there is a strong emphasis on walking and cycling but little mention of horse riding. There are horse riders based in Luton and improvements in the network both within Luton and providing links to the network outside the town are required.	Add the following sentence to the supporting text to Policy 3 (Public Rights of Way) in section 10.2, after first para in RH col on p66: “As there are stables and horse riders based in Luton, particularly in the north of the town, we will seek to improve connections to Bridleway and other routes on the periphery of Luton.”
England's Economic Heartland (EEH)	Luton's high access to superfast broadband means it is well placed to benefit from a change in working trends and subsequently more focus on the opportunities for homeworking could be emphasised in Policy 5.	Amend the user needs prioritisation in section 7.2.1 to read as follows: 1. Pedestrians and vulnerable street users 2. Bicycle and scooter users (including shared use) 3. Public Transport 4.Reducing single occupancy car use through Travel Demand Management (e.g working from home or encourage Active Travel) 5. Car and other private motorised vehicle users
	EEH recommend the revised Local Transport Plan could refer in Policy 4 to the priority to develop mobility hubs to support sustainable urban transport.	Strengthen Policy 4 and supporting text in section 10.3 to refer to the opportunities of mobility hubs to support sustainable transport.
	The Draft LTP does not currently have in it a suite of Performance Indicators on which to measure impact and delivery of the Plan's priorities and policies.	The desired outcomes and data sources associated with each Policy (or in some cases groups of these) are summarised at the very end of each policy. However we suggest these are also summarised in an Appendix.
	It is clear from the Strategy that land use patterns in Luton have evolved in such way that industrial premises and associated freight activity largely occur in out of town locations. It would be useful to understand Luton Borough Council's views on the proposed Sundon Rail Freight Interchange adjacent to the Midland Main Line and M1.	Add the following sentence at end of the first para in the LH col on p78: “Central Bedfordshire Councils emerging Local Plan includes proposals to extend the employment areas in the vicinity of M1 Junction 11a and Sundon Park Road, including a Rail Freight Interchange at Sundon. If approved, these proposals will further expand the employment opportunities in the north west of the town, with good access to the

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Hertfordshire County Council (HCC)		Strategic Road Network and to rail.”
	With regard to improving access to Luton station the provision of a train access ramp for wheelchair/scooter use is included in any plans for step-free-access.	Amend third bullet point in Policy 22 on page 94 to read as follows: “Working with Network Rail and train operators to ensure Luton and Leagrave stations become fully accessible”. Also amend end of last sentence of first paragraph in LH col on p95: “...will enable wheelchair and mobility scooter users to access all platforms, which is anticipated will be completed by 2024.”
	Many policies and schemes identified are likely to be costly to deliver. More detail on how these would be prioritised would be helpful; in Hertfordshire’s LTP4 we have developed a transport user hierarchy to help us with scheme prioritisation.	The amended Transport User hierarchy is set out on the previous page. Notwithstanding that we will discuss HCC how they use their user hierarchy to prioritise schemes to determine if a similar approach could be adopted in Luton.
	The LTP does not identify the significant opportunity offered by working from home in particular the revised working arrangements brought about as part of the response to COVID.	The amended Transport User hierarchy set out on the previous page refers to ‘working from home’. Indeed the Luton LTP questionnaire results (see section 2.3 of this report) highlight that this will provide significant opportunities. EEH are currently carrying out some further work on opportunities of ‘working from home’ to reduce travel demand, which we will also refer to in section 7.1 if that is published in time.
	There appears too little recognition that in order to prioritise active and sustainable modes as an alternative to private car use, there is likely to be a requirement for reallocation of available highway capacity away from the private car and towards active and sustainable modes. For example, for the Park and Ride site identified on the A505 at Butterfield, to be successful high-quality bus priority measures will be required along this corridor to ensure bus journey times are competitive with the car along with parking restraint in the Luton town centre. It is not clear how the bus priority fits with the proposed dualling of Vauxhall Way and the junction improvement schemes along it.	With regard to the Park and Ride site, Figure 8.1 on page 51 shows the bus route as using the northern section of Vauxhall Way; the dualling of this section could accommodate priority lanes for buses and car sharing.
	It isn’t clear how the Healthy Streets approach (p 37) is going to be applied. There is significant scope for weaving the opportunity across the whole of the LTP to inform how all highway schemes are developed; a similar approach has been adopted by HCC with its Place and Movement approach being used to inform the types of solutions that should be being sought in line with the different P&M classifications.	As noted in section 7.2.4, the last para in the LH col on page 37 refers to Luton’s emerging Streetscape design guide being based on the Place & Movement approach. We will consider how this can be incorporated into the other strategic transport priorities in section 7.2.

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	There is a risk that the opportunities for improving sustainable travel for the First Mile and Last Mile of longer journeys could lead to investment being pushed towards the more affable areas. Technology represents a real opportunity; however, there is a need to consider whether certain technology is simply reinforcing existing unsustainable behaviours, such as increased access to ride hailing may lead to an increase in single occupancy journeys.	Add the following sentence at end of the first para in the LH col on p36: “However in some cases ride hailing may lead to an increase in single occupancy vehicle journeys.”
	For Mobility Hubs to be successful they have to be more than just transport interchanges, but also thought of in terms of how they might be able to support regeneration and provide a wider function so that they might even be considered destinations in their own right. For example, including cafes, flexible workspace, appealing public realm and public open space and retail/ parcel pickup.	Add the following text at end first bullet point in the last para in the RH col on page 43: “ ... which could include cafes, flexible workspace, and public realm/open space”.
	Car sharing is only beneficial if it can be proved to remove another trip from the network. School-related car sharing can be misunderstood i.e. taking a child to school in a car isn’t removing a trip from the network as the child cannot drive, if you are taking multiple children from different families to a school which would have otherwise been driven separately there is more of an argument. However, the priority for this type of trip should always be as an active or sustainable trip rather than a car share trip.	Add the following sentence to after the last sentence in RH col on p33: “In relation to shared car use, it should be noted that school-related car share only applies when children from different families are driven to a school which would have otherwise been driven separately. “
	The focus of the draft LTP is inward-facing and this is reflected in few references or links to other areas (except Dunstable and Houghton Regis). Figure 6.1 shows the importance of the Maylands Business Park in Hemel Hempstead, the Hatfield Business Park and St Albans centre as important work destinations for Luton residents, but there is nothing in the LTP referencing the importance of sustainable transport links to these areas or how these can be supported/improved.	Add the following after the last paragraph in RH col on p29: “Figure 6.1 shows that after the Luton-Dunstable conurbation, the areas around Brogborough and Cranfield near M1 Junction 13, together with St Albans and the business parks in Hatfield and Hemel Hempstead are important work destinations for Luton residents. St Albans is only 15 minutes by train from Luton, from where there are bus services to both Hatfield and Hemel Hempstead. We will work with Hertfordshire to promote more sustainable travel to Luton residents working in these areas.”
	Likewise, there is no reference to supporting a wider A505 corridor study and longer distance East-West transport aspirations. We would ask that these opportunities are included	Add the following paragraph to the end of the section about Luton Northern Bypass sentence. “Given that the A505 is part of the DfT’s Major Road Network, Luton

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	with the LTP.	Councils is collaborating with Central Bedfordshire Council, Hertfordshire County Council and North Hertfordshire District Council in a study of the section of the A505 between Leighton Linlade and Royston that is examining the opportunity for further travel improvements in this corridor."
	We would be interested in understanding what sort of technology/app/call centre is in place in Luton to support DRT.	No amendments required; this would be a consideration in bringing forward detailed proposals for DRT schemes.
Historic England	Suggest Vision specifically mentions the need to 'preserve and enhance our built, natural and historic environment'.	Amend the Vision in Chapter 5 to specifically refer to the 'natural and built environment.
	We welcome the reference to in the fourth objective to 'an attractive environment but there is no mention of the historic environment. We suggest that conserving and enhancing the historic environment should also be mentioned in this paragraph.	Given that the objectives flow from the Vision, amend the fourth objective to refer to preserving and enhancing the built, natural and historic environment.
	We welcome improvements to walking and cycling from these developments into Luton and out to the countryside beyond. In terms of the historic environment, the cluster of listed buildings and manorial complex at Sundon will require sensitive treatment. Similarly, the Drays Ditches scheduled monument at the eastern end of the site requires careful consideration.	Add the following sentence to the supporting text to Policy 3 (Public Rights of Way) in section 10.2, after last para in RH col on p66: "However, improving connectivity between Luton and the surrounding countryside would require sensitive treatment in the vicinity of historic assets such as Drays Ditches."
	Luton Railway station is located between two conservation areas; High Town and Plaiters Lea, both of which are on the Heritage at Risk Register. Careful design and management in relation to railway station improvements is needed that both conserves and enhances these nearby conservation areas and their associated listed buildings. We see this as an important opportunity to enhance the heritage in the area.	No amendments required; however this comment should be noted in the context of the emerging Luton Town Centre Strategy.
	Over a number of years Historic England has expressed concerns regarding the Luton Northern bypass. Whilst we note that LBC would like to see a link to the A505, we re-iterate our concerns regarding the potential impact of a road in this area on the historic environment We are particularly concerned about the potential impact upon Drays Ditches and the strip lynchets on Stopsley Common, both of which are scheduled monuments.	Noted; however the section about Luton Northern Bypass in chapter 8 (page 53) does not specifically refer to the A6-A505 section of the bypass. Should proposals come forward in the future they will need to take into consideration environmental concerns and if necessary mitigate any impacts.
	Chapters 10 and 11 list a number of key policies for the Plan but there is no mention of the historic environment. We therefore	Add a specific policy on environment (and supporting text) to include reference to these aspects of the historic environment (see Annex C to

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	<p>strongly suggest that the Plan includes a specific policy for the historic environment. The wording should include 'Conserving and enhancing our built and historic environments' in line with the wording in the NPPF.</p> <p>All designated heritage assets should be referenced in the policy as well as non- designated heritage assets together with the potential for unknown archaeology. Mention should also be made of the importance of the setting of these assets. The NPPF makes it clear that the significance of heritage assets may be harmed by development (which can include transport schemes) in the setting of heritage assets.</p> <p>The policy should take account of how highways design and the historic environment can be successfully incorporated. We would expect to see schemes assess their impacts upon townscape, historic landscape and heritage assets and design accordingly. New roads, cycle paths and associated infrastructure, including signage and hard standings for example, will result in impacts on landscape and townscape.</p> <p>As such Historic England would want to be reassured that matters of siting, location and design will conserve the historic environment of the area.</p>	<p>Policy Group report). However it is felt inappropriate to specifically reference all designated/non-designated heritage assets in the LTP; this is more appropriate for the Local Plan.</p>
North Hertfordshire District Council (NHDC)	<p>Concerns that new Park & Ride site located at Butterfield Park adjacent to the A505 could induce additional traffic along an already busy corridor as well as increasing rat running through local villages.</p>	<p>Add the following sentence to end of the second paragraph of Chapter 9 (page 57): "We will work with NHDC and HCC to ensure a consistent approach on scheme design and implementation."</p>
	<p>NHDC's emerging Transport Strategy supports proposals for a 'Sustainable Spine' with a focus on enhanced public transport and cycling connectivity between Luton, Hitchin, Letchworth, Baldock and Stevenage.</p>	<p>This LTP is also focussed on sustainable travel and therefore we support this approach. Add the following sentence to end of the second paragraph of Chapter 9 (page 57): "We will work with NHDC and HCC to ensure a consistent approach on scheme design and implementation."</p>
	<p>NHDC's are also developing an LCWIP that could improve cycling connectivity between Luton, Hitchin, Letchworth, Baldock and</p>	<p>Noted; this is covered by the above proposed amendments.</p>

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	Stevenage.	
Raifuture Beds and Herts group	We agree that improved routes for walking & cycling to railway stations is a very important goal. As part of this it is essential to work with the train operator to provide sufficient secure storage at the station.	Add the following sentence at the end of section 7.2.2: “In addition to creating a network of cycle routes to enable residents to safely cycle to neighbourhood facilities and to work, it is important to provide secure cycle parking at the other end of the trip, e.g at rail stations, workplaces and shops.”
	E-bikes allow rail travellers to both come from further away by cycle and, by reducing exertion levels, allow use without a change of clothes. We believe an ability to charge e-bikes at the station is important.	Noted. Potential opportunities to be considered through the emerging Town Centre Framework Plan.
	Tickets that are valid across multiple platforms are essential. It is important that combined tickets: a) do not mean users need to acquire another physical token; the ability to use Smartphones and other operators Smart Cards, such as GTR’s The Key are essential. b) support occasional users on other mediums such as QR Codes Combined tickets should also be easily purchasable for journeys that start on the bus.	Add the following sentence at end of the last paragraph in RH col on page 35: “In moving to a Smartcard for public transport users, where possible use of existing smartcards should be considered.”
	Whilst travel by rail is generally not a natural candidate for journeys within Luton, the possibility of encouraging the option Walk / Cycle to Legrave > Train to Luton Airport Parkway > DART to the Airport [and vice versa] might be encouraged, in view of the speed of the journey across Luton Town centre.	Add the following sentence at end of the last paragraph in LH col on page 36: “In considering the application of First Mile/Last Mile for journeys within Luton, the benefits of using local rail services should be promoted.”
	The possibility of using land immediately adjacent to Luton Airport Parkway station might be contemplated, particularly if it gives access to National and Regional funding through encouraging a switch to rail at that station, as well as reducing traffic in Luton Town Centre.	No amendments required as Luton Airport Parkway station is already signed on the M1 as a Park & Ride site.

4 Strategic Environmental Assessment

4.1 Background to the Strategic Environmental Assessment process

Since July 2004 it has been a requirement under European Directive 2001/42/EC to undertake a Strategic Environmental Assessment (SEA), of such Policy documents. By carrying out an SEA on Luton's LTP4, Luton Borough Council aims to:

- identify alternative strategy options for delivering sustainable transport improvements in Luton
- identify and describe the environmental, social and economic effects of alternative strategy options
- further enhance beneficial environmental effects of the LTP
- reduce and minimise the adverse environmental effects that may result from the LTP

The SEA process includes two stages of consultation:

- A Scoping Report, that must be consulted upon with Statutory stakeholders
- Preparation of a draft Environmental Report that must be consulted upon alongside public consultation on the draft LTP4

Copies of the responses on the draft Environmental Report are included in Appendix B, although for consistency comments about the LTP itself are included in the Tables in Chapter 3. The final section of this chapter therefore only addresses comments in relation to the draft Environment Report.

4.2 SEA Scoping report

An SEA Scoping Report for Luton's LTP4 was circulated to the statutory environment bodies Natural England, Historic England and the Environment Agency in order to seek their views. The Scoping Report provides an environment baseline and identifies the environmental problems in the absence of the LTP.

Objectives for the SEA were developed through an assessment of other relevant plans and programmes at the international, national and local level. Finally, the SEA framework against which the LTP will be assessed was developed.

Overall, Luton Borough Council expects SEA to be influential in informing the development of Luton's LTP by identifying potential environmental effects of the LTP options. This will allow for environmental considerations to be fully integrated into the LTP as it is developed.

Once developed, the LTP4 strategy options will be evaluated in light of their potential effects on the SEA objectives. For all options, matrices will be used to predict and evaluate how the implementation of these options would affect the SEA objectives and the indicators that comprise the environmental baseline.

Once options assessment is complete, preferred options will be selected and incorporated into the LTP4 strategy and an Environmental Report will be prepared in conjunction with the LTP. The Environmental Report will be published and made available alongside Luton's LTP4 consultation document.

4.3 Responses to the draft Environmental Report

Historic England

Their two key concerns are the lack of reference to the historic environment in the LTP (including the lack of a specific policy that addresses the historic environment) and concerns regarding whether the

SEA provides a thorough assessment of potential impacts on the historic environment. Historic England's comments on the LTP are incorporated into the Table in chapter 3.

With regard to the draft Environment Strategy, Historic England welcome the wording and use of the term "setting" within SEA Local Objectives, but advise that this wording is used throughout the document. They added it would be helpful to use the term historic environment as this is wider than just townscape.

Historic England also state that it would be helpful to consider the ability of the emerging LTP to deal with the effects of development proposals on unknown heritage assets. For example, how will the plan deal with development proposals in areas with archaeological potential but with no known designated or non-designated heritage assets and does the Plan outline how this situation is to be addressed by prospective applicants or decision makers.

Finally they note that whilst the assessment makes reference to the potential impact of the Butterfield Park and Ride on Putteridge Bury Registered Park and Gardens, no mention is made of other impacts that Luton Northern bypass on heritage assets. Historic England are therefore concerned that the assessment is not particularly thorough or robust.