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**Comments on Submissions received by Deadline 1 on behalf of
Holiday Extras Ltd Concerning Airport Surface Access with Particular
Reference to Long Term Passenger related Car Parking Provision**

PINS Ref No. TR020001

Deadline 2

Registration Identification No. 20039891

1.00 PRELIMINARY CONSIDERATIONS

- 1.01 There have been no attempts made by the Applicant to engage with Holiday Extras Ltd on surface access considerations as part of the DCO application, despite earlier discussions which took place between mid-November 2019 and the end of February 2020 over the provision of a new satellite off-airport car parking facility to be run jointly by both parties, to meet the needs of those passengers seeking airport related car parking. This is a consideration which has not disputed by the Applicant.
- 1.02 My clients have responded to all the earlier consultation exercises pending the submission of the current DCO application. They have played an important role in providing airport related passenger car parking for a period in excess of 20 years from their current site at Slip End, where they continue to provide a long term off-airport car parking facility equivalent to 84% of that provided on-airport in 2043. An impartial observer could not be faulted for suggesting that the Applicant has sought to deliberately exclude my clients from any involvement in surface access considerations surrounding the DCO project.
- 1.03 This situation is considered to represent a missed opportunity in which constructive discussions could have taken place on reasonable alternatives with the Applicant, as part of an integrated approach to surface access, regardless of any role Holiday Extras Limited may play in the future. These events are happening at a time when the Applicant has decided to no longer pursue its interest in renting a site for airport related car parking outside the Operational Area Boundary of LLA, on land outside the DCO application. This is despite outlining in response to my client's Relevant Representations: *"It is considered inappropriate in the context of the mode share limits which have been set, and the sustainable travel aspirations underpinned by the GCG, to propose a significant uplift to the base condition parking spaces with the intention of increasing the parking stock above the levels that are currently proposed"* [8.31 Applicant's response to Relevant Representations – Part 2B of 4 (Members of the Public) p.30]
- 1.04 Holiday Extras Limited's absence in any discussions on surface access has an impact on whether the Green Controlled Growth Framework and Framework Travel Plan represents the most appropriate balance between enabling sustainable growth at LLA to deliver the significant socio-economic benefits associated with the proposed development, at the same time protecting the local community and managing the

resultant environmental consequences of the proposed expansion, of which indiscriminate on-street car parking, referred to as “fly parking” remains a prominent issue.

- 1.05 Holiday Extras Limited through their subsidiary company Airparks, has not been invited to join the Airport Transport Forum, which is of no benefit to any party. The role of the Airport Surface Forum should be to provide a collaborative environment for key stakeholders in which a long-term approach to transport planning can provide direction and guidance to the Framework Travel Plan and LLA’s Surface Access Strategy. My clients are not only an established part of the Slip End local community, but any strategy devised in making journeys to the airport by improved sustainable modes including meeting targets and Limits, are more likely to be achieved with their assistance than without it. It is noted that in its response to Holiday Extras Limited’s Relevant Representations, Luton Rising state: *“The future form of the ATF is under discussion and the comments provided (by the writer on their behalf) are noted.”* [8.31 Applicant’s Response to Relevant Representations – Part 2B of 4 (Members of the Public) p.17]

2.00 SIGNIFICANT FACTORS ARISING FROM LUTON RISING’S RESPONSES TO THE RELEVANT REPRESENTATIONS 1

A. Increased Car Journeys and Parking Spaces

- 2.01 The Applicant’s response to Relevant Representations accepts that the DCO application will result in additional journeys made by car to LLA and these effects will arise despite measures to increase public transport patronage, including tripling the number of coach and bus bays as part of later phases of the application, and extending the Luton DART to Terminal 2.

- 2.02 In this regard the following responses are provided by Luton Rising:-

“Despite measures to increase the proportion of journeys to the airport by public transport there will be additional journeys made by car due to the growth in passengers as a result of the Proposed Development. The proposed strategy aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods.” [8.31 Applicant’s Response to Relevant Representations – Part 1 of 4 p.181]

“The Applicant has taken a pragmatic view on mode share targets given the airport’s location, staff and passenger catchments. Whilst the Applicant is supportive of sustainable transport, including tripling the number of coach and

bus bays as part of the expansion and extending the Luton DART to Terminal 2 it is not realistic to assume there would be no additional car travel.” [8.31 Applicant’s Response to Relevant Representations – Part 2D of 4 (Other Statutory Organisations) p.15]

*“There is no policy requirement for expansion of the airport to take place with no increase in car trips. The **Transport Assessment [APP-203-APP-206]** sets out the identified transport impacts of the proposed development, including those associated with the increase in car trips, and goes on to set out the proposed mitigation to address those impacts.” [8.31 Applicant’s Response to Relevant Representations – Part 2D of 4 (Other Statutory Organisations) p.34]*

“There is no policy basis requiring the Proposed Development not to result any net increase in vehicle trips and policy recognises the need to balance the socio-economic benefits of growth at the airport with the management of the arising environmental impacts. It would not be possible to deliver the same socio-economic benefits of growth without some increase in traffic, for which suitable mitigation is proposed. [8.31 Applicant’s Response to Relevant Representations – Part 2D of 4 (Other Statutory Organisations) p.37]

“The modal shift aspirations are preferable to the inclusion of significant amounts of long term parking from both an environmental and highway capacity perspective. The ratio of parking spaces per passenger as the airport expands is planned to decrease, although it is acknowledged that the overall number of parking spaces will increase. The potential impact of the increase in passenger numbers all arriving by car would not be significant, and as such there are Limits and measures in place to maximise access to the airport by public transport.” [8.31 Applicant’s Response to Relevant Representations – Part 2D of 4 (Other Statutory Organisations) p.37]

B. Factors Not Affected by Green Controlled Growth

- 2.03 A number of trips in which passengers rely on the private car to access LLA lie outside, or are difficult to calculate through the interventions forming part of either Green Controlled Growth and the Framework Travel Plan. These have been included in the representations raised on behalf of Holiday Extras Ltd submitted prior to Deadline 1, being primarily: i) “drop-off” and “kiss and fly” modes; ii) airport-related car parking at hotels and guest houses; iii) the contribution made by transportation network companies; and iv) technological platforms such as JustPark in which passengers are matched with home owners who rent out their driveways for airport related car parking purposes.
- 2.04 The Applicant has demonstrated in its summary of individual residual environmental effects upon road vehicle users, that the construction of the proposed development is shown to be **not significant**. In the event of the proposed DCO application being allowed, and as a consequence of infrastructure improvements to the existing highway

network, journey times from Terminal 1 to the M1 Motorway and vice versa, during peak periods will be only marginally different from those without the proposed expansion.

2.05 It is the Applicant's and Operator's stated intention to work with local planning authorities to understand the impacts of the airport through on-going monitoring as set out in the Outline Transport Related Impact Monitoring and Mitigation Approach. (OTRIMMA).

2.06 A combination of improvements to both the local highway network and to passenger drop-off and taxi stands¹ along with the provision of a new multi storey car park is equally likely to result in unintended consequences proving attractive to the least sustainable modes of access to LLA, namely "drop-off" and "kiss and fly", involving a doubling of trips to the airport. This factor does not appear to have been assessed, a factor evident from the following responses from Luton Rising to Relevant Representations:-

"The number of parking drop-off spaces has been determined to meet the future demand alongside achievement of the mode share targets. Substantial improvements have been made to the forecourt arrangements including the new multi storey car park (MSCP) which incorporates drop-off on the ground floor with improved connectivity to the existing terminal. The current drop-off arrangements would be improved as part of the proposed development.

A new forecourt area with passenger drop-off, taxi and bus stands will be provided to serve Terminal 2. It has been designed to cater for the airport's busiest hours and cater for drop-offs, taxis regular buses and shuttle buses. The design is based on the principle of private car drop-off activity taking place at ground level, with all private car pick ups taking place within a short stay MSCP located directly above." [8.31 Applicant's Response to Relevant Representations - Part 1 of 4 p.185]

2.07 As part of the initial Relevant Representations raised on behalf of my clients, attention was drawn to the fact that it is counter-intuitive to set up a charging mechanism at the airport's car parks, which on the one hand seek to discourage the "kiss and fly" mode: whilst on the other, simultaneously proposing a steep increase in the number of drop-off and taxi spaces over the three phases of the DCO application, along with an additional

¹ Paragraph 8.3.35 of Document AS-123 states that in addition to the Terminal 1 forecourt improvements, Phase 2b Forecourt and Terminal 2 is to include kerb space for approximately 56 drop-off spaces and 16 taxi spaces, whilst the full assessment Phase 2b build out at ground level forecourt Terminal 2 is to include kerb space for approximately 100 drop off spaces and 49 taxi spaces.

pick-up/drop off area in Car Park 12 in Phase 2b. Luton Rising's response does not challenge these likely outcomes:

"For taxis, minicabs and private hire vehicles, the Framework Travel Plan sets out a number of possible interventions and measures to improve the efficiency of their operations. This includes the possible introduction of new measures which encourage more efficient use of taxi and private hire trips, ensuring where possible vehicles are occupied in both directions, thus reducing the number of empty vehicle trips coming in and out of the airport. [8.31 Applicant's response to Relevant Representations – Part 2B of 4 (Members of the Public) p.13]

2.08 Measures to improve the efficiency of taxis and minicabs will also assist those passengers who choose to park their vehicles on the private driveways of residential properties in the vicinity of LLA, before the passenger takes a taxi from the individual property to LLA, and vice versa. Whilst this intervention would reduce empty vehicle trips in both directions; by the same token it positively encourages one of the least sustainable trips to the airport; a matter which does not seem to have been evaluated.

2.09 The market for private hire vehicles is heavily fragmented consisting of many different companies operating from different geographical catchment areas. This is aside from the fact that minicabs are likely to pick up their passengers from the short stay car parks of airports, and hence would not be subject to waiting for a fare in a kerbside location where the chance of picking up a passenger needing to return to the same geographical area is remote.

2.10 These considerations cannot be divorced from issues raised by third parties relating to the cost of parking and "drop-off" at the airport. Luton Rising's response appears to indicate that the issue of high cost of parking and "drop-off" is a matter left for the Airport Operator. It follows there is no guarantee that the Airport Operator intends to pursue the same priorities as the Applicant.

"Drop-off/parking charges are set by the Airport Operator". [8.31 Applicant's Response to Relevant Representations – Part 1 of 4 p.193]

2.11 Luton Rising in its responses indicate that they appreciate the importance of integrating ticketing/contactless and joint marketing for rail based travel, so as to provide a seamless transfer through the Luton DART services, although they acknowledge that ticketing lies outside the scope of the Development Consent Order application.

“Luton DART provide a dedicated light rail link between Luton Airport Parkway Rail Station and the Airport. Ticketing is outside the scope of this application for development consent. However, the #applicant understands the importance of integrating ticketing/contactless and joint marketing for rail-based travel and all are being developed for the launch of a seamless transfer through Luton DART services.” [8.31 Applicant’s Response to Relevant Representations – Part 1 of 4 p.204]

- 2.12 Central Bedfordshire Council in their written representations refer to the impact of inconsiderate and inappropriate parking by airport passengers who leave their vehicles on local roads. They raise concerns over the robustness of the Framework Travel Plan and the assumptions that feed into the public transport provision for the development. Slip End Parish Council similarly raise issues on an increase in opportunist “flyparking” in the village by the public using the airport.
- 2.13 The response from Luton Rising to residents who raise issues relating to on-street parking in residential areas is vague and unconvincing:

“The Framework Travel Plan [AS-131] sets out measures relating to on-highway parking, in Table 5.1. These include carrying out a feasibility study on restricted parking zones, supporting the expansion of the residents parking zone north of the airport and working with local authorities to develop an approach to prevent airport-related parking being causing a nuisance to people north of the airport.

As part of the proposed development, there will be on-going monitoring of the surface access impacts of the airport. The Applicant will seek to enter into discussions with local authorities with regarding to the potential of providing assistance with parking management schemes in their local residential areas where there is a clear demonstration that there are problems relating to inappropriate airport related parking.

It should be noted ultimately, however, that it is the responsibility of neighbouring authorities to put in place any parking restrictions as appropriate. [8.31 Applicants Response to Relevant Representations – Part 1 of 4).

- 2.14 The response from Luton Rising to Slip End Parish Council on the issue of opportunist “flyparking”, states:

“The Applicant is of the view that local planning authorities have a key role to play in monitoring and managing the impact of off-site car parks, especially in ensuring that a proportionate split between on-site and off-site parking remains and does not result in uncontrolled or unmitigated environmental effects which could undermine the ability of the Applicant to meet Green Controlled Growth (GCG) targets.

The Transport Assessment [APP 203- APP 2-06] and Surface Access Strategy [APP-228] set out the proposed monitoring and mitigation measures associated with future car parking provision. As part of the ongoing review process, the Applicant intends to produce monitoring programmes, assess any impacts and then intervene accordingly if any issues persist.

The Applicant has provided support to local areas where there is a realistic opportunity for people to “flypark” in local streets.

The Applicant considers the likelihood of an increase in passengers and staff “flyparking” remotely in villages and Parishes surrounding the airport as part of the proposed development very low. If such instances do occur, the Applicant would welcome discussions through the Airport Transport Forum to raise these issues and discuss potential solutions. “

- 2.15 Luton Rising rely on the Framework Travel Plan and a feasibility study on the expansion of restricted residents parking zones north of the airport, which it is said will be worked up with local authorities. The same topic was the subject of a consultation exercise carried out in 2017, the results indicating that there was a considerable level of objection outside the Vauxhall Park area to the introduction of a permit parking scheme with an option of times and days of the week when it could apply. The consultation exercise led to a delay in the introduction of a parking restriction option in the Wigmore area. This was a matter brought to the attention of the Inspector at the time of the public inquiry into the Secretary of State “called-in” appeal concerning an expansion of LLA from 18mppa to 19mppa.
- 2.16 It is unclear whether the issue of parking restrictions in residential streets is intended to be the subject of monitoring in conjunction with local planning authorities, and whether the same authorities are expected, whether in whole or in part, to mitigate and finance any “flyparking”. This situation arises as the Applicant considers that the likelihood of an increase in passenger “flyparking” in villages and Parishes surrounding the airport as part of the proposed development is very low. That view does not seem to accord with the opinion expressed by Slip End Parish Council. A further question which arises is whether any measures to curtail indiscriminate parking in residential streets are to be the subject of monitoring and managing through the Surface Access Strategy or indeed as part of the Framework Travel Plan.
- 2.17 The response from Luton Rising to Slip End Parish Council on the topic of opportunist “flyparking” is that if such circumstances do occur, the Applicant would welcome discussions through the Air Transport Forum on potential solutions. Clearly, Holiday

Extras Ltd being present in Slip End, and if a member of the Air Transport Forum, are in a position to play a central role in any coordinated approach involving Central Bedfordshire Council and Slip End Parish Council to alleviate this issue.

- 2.18 Questions have been raised over whether a Sustainable Transport Fund should be set up to finance sustainable travel solutions in terms of surface access to LLA. No firm decisions have been made concerning this important issue, which is surprising given the commencement of the Examination. This becomes clear from the responses to representations raised by Central Bedfordshire Council and by my client, Holiday Extras Ltd. In this regard, the response from Luton Rising to these two relevant representations is set out below:

"The Applicant and airport operator are currently in discussions around providing greater clarity on the responsible party and the identified funding source for sustainable transport measures set out with the Framework Travel Plan."
[AS-131]; [8.31 Applicant's response to Relevant Representations - Part 1 of 4 p.225]

"The applicant and operator are currently developing a suitable and effective funding mechanism that best responds to the vision and objectives of the Surface Access Strategy, and realising Sustainable Transport Opportunities. Further details will be shared during the course of the Examination, following further consultations with relevant stakeholders on the details of the Sustainable Transport Fund."
[8.31 Applicant's response to Relevant Representations - Part 2B of 4 (Members of the Public) p.15 & 16]

3.00 CONCLUSIONS

- 3.01 In my client's view, any form of integrated transport solution affecting surface access to LLA is required to be carried out in the form of an iterative process as part of an examination of reasonable alternatives. This process involves considerations of demand management in which the central issue is the impact on overall passenger amenity with the propensity for passengers to switch to an alternative mode to the airport. Each scenario has implications on overall traffic demand as well as environmental consequences.
- 3.02 By way of example, attention could be focussed on taxi charges examining the introduction of a levy at varying charge rates in order to assess the extent of the impact on alternative modes of access to LLA; the underlying intention being a reduction in what is one of the least sustainable modes of access to the airport. A similar exercise could be carried out in respect of drop-off zones, which could be assessed in the context

of different numbers of proposed kerbside spaces where the objective is not only to curtail unsustainable travel modes, but to assess whether dependant on varying changes in charge levies, any marked changes to more sustainable means of access to LLA would occur.

- 3.03 It appears to Holiday Extras Ltd that Luton Rising do not attribute any sustainable benefits to an established traditional long term off-airport car parking provider, despite the fact that transporting passengers on a Euro 6 emissions bus with a capacity of 61 people, should be seen in terms of providing benefits to air quality, carbon emissions and congestion on the local highway network, compared with other less sustainable means of access which indirectly are being encouraged by the Applicant. To take no proper account of my client's existing operations or contribution to surface access to LLA is unlikely to produce benefits to any of the mechanisms employed to manage the adverse environmental impacts arising from the proposed expansion of the airport.