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**Comments in Response to Action Point 15 Arising from the Issue Specific Hearing
on Traffic and Transport (ISH4) on behalf of Holiday Extras Ltd Concerning
Fly Parking and Off-Site Parking**

PINS Ref No. TR020001

Deadline 3

Registration Identification No. 20039891

1.00 PRELIMINARY CONSIDERATIONS

- 1.01 My clients, Holiday Extras Ltd, are grateful to the Examining Authority for affording them the opportunity to provide additional information on fly parking along with issues surrounding long term off-airport related passenger car parking relating to LLA.
- 1.02 Three important issues arise from the Issue Specific Hearing on traffic and transport (ISH4) which need to be brought to the Examining Authority's attention. Firstly, it was stated by the Applicant and recorded as such in Part 2 of the Transcript of Recording of Issue Specific Hearing 4 (hereinafter referred to as Document EV9-006) that the Airport Transport Forum has membership *"including Airparks which are a subsidiary of Holiday Extras, so they're already represented on the current ATF."*
- 1.03 That comment is incorrect and requires correction. It is not only contrary to paragraph 1.05 of the representations raised by Holiday Extras Ltd at Deadline 2 (Document REP2-060), but at no time has my company or I am reliably informed has my clients received any notification in the form of invites to meetings, minutes or agendas concerning the Airport Transport Forum. Holiday Extras Ltd are in regular discussions with those responsible for the everyday management of their off-airport car parking facility at Slip End, and any notification of meetings of the Airport Transport Forum would have been brought to their attention.
- 1.04 It is my client's wish to be part of the Airport Transport Forum so that they can contribute to discussions on parking provision associated with LLA, particularly given the acceptance by the Applicant that long term off-airport car parking makes an important contribution to airport related car parking generally both now and into the future. In this way, Holiday Extras Ltd through their subsidiary company Airparks clearly have a role to play as a long established business concerning aspects on which the Airport Transport Forum are expected to be an important contributor, namely the Framework Travel Plan, thresholds and limits relating to Green Controlled Growth and issues generally surrounding the Airport's Surface Access Strategy. In this respect the Applicant made the important comment at the ISH4 on traffic and transport that *"Holiday Extras are clearly a really important partner at the airport"*.
- 1.05 Long term off-airport car parking offers the passenger choice, consistent with those consumer principles used in devising CAA's Consumer Strategy published as recently as

29th September 2023. Of particular importance in using the consumer principles in the context of aviation it is said:

*“One of the CAA’s purposes is to support consumers in relation to **choice, value and fair treatment**. The consumer principles can help provide a framework to enable this.*

Access

Consumers should be able to access services at a price and quality that sits their needs. Barriers to access should be identified and addressed. Barriers could include price or difficulty finding relevant information for example.

Choice

Where consumers have choice, they should be able to affect the way goods and services are provided through the choices they make in the marketplace. In order to exercise choice, consumers need to be able to find meaningful information, at the right time, and in a format that makes it easy to compare. To be able to exercise choice confidently consumers also need a strong regulatory framework to protect them if things go wrong.” (highlighting as per original document)

- 1.06 Secondly, I raised the specific point at the ISH4 on traffic and transport that a reading of all the documents associated with the Transport Assessment reveals no explanation in terms of the methodology employed, or indeed any signposting, of how the proposed levels of mid and long term on airport passenger car parking provision in the various phases of the DCO application had been derived. This is a matter which can be verified by the recording of Issue Specific Hearing 4 (ISH4 - Part 1 - 28 September 2023 (Document EV9-003).
- 1.07 The response provided by Mr Matthew Rhodes on behalf of the Applicant, which can be confirmed from the same recording (Document EV9-003), did not address the question raised. In response, Mr Matthew Rhodes did not consider what his colleague had requested, namely matters relating to off-site car parking. Instead, the Examining Authority was directed to Document AS-123 and in particular to Chapter 8 and paragraphs 8.3.37 to 8.3.51. My clients are conversant with the provisions of short, mid and long term on-airport car parking spaces, as the Examining Authority will have noted from the representations raised by Holiday Extras Limited at Deadline 1 (Document REP1-073). That part of Chapter 8 of Document AS-123 referred to by Mr Matthew Rhodes is directed at types of car parking proposed on-airport, including numbers over the three phases of the DCO application. No information is provided detailing the methodology used to arrive at the figures for mid and long term on-airport passenger car

parking at Phases 1, 2A and 2B, the only comment of relevance being in paragraph 8.3.40 of Document AS-123:-

*“8.3.40 Future passenger car parking requirements have been determined from the baseline of 10,550 car parking spaces which is the level of car parking required at the point where the airport reached its permitted capacity of 18mppa. The future car parking takes account of the growth in passengers and the assumed reduction in car parking mode share (see Section **Error! Reference source not found**)”*

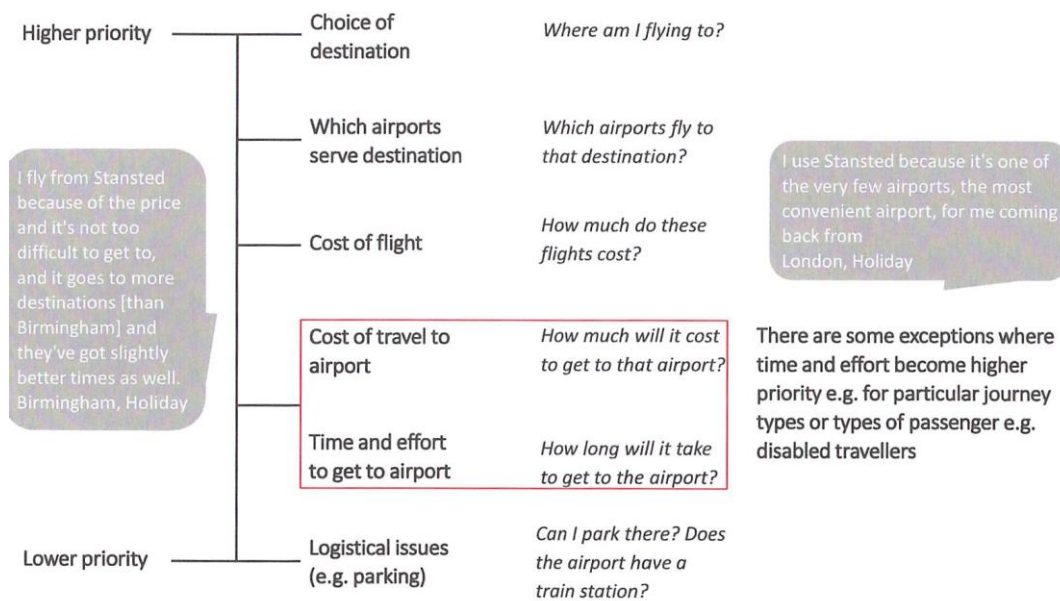
- 1.08 In short, the Examining Authority have not been provided with any information on the methodology adopted in arriving at the figures relating to proposed short, mid and long term on-airport passenger car parking over the three phases of the DCO application, and importantly how they have been devised. This is in contrast to the needs case referred to in Document AS-125 where the approach to future passenger forecasts has been carefully explained.
- 1.09 In my client’s view, this represents a serious omission in the evidence base comprising part of the DCO application, in contrast to applications seeking an expansion of infrastructure at other airports where additional airport related car parking provision is being sought. In these cases, individual methodologies are set out, taking into account daily and peak hour traffic flows; airport surface access peak hour traffic flows; peak network demand relying on busy hour; car occupancy factors; origin/destination of passenger trips and passenger profiling considerations, amongst other parameters to explain and justify on-airport passenger forecast parking demand.
- 1.10 This omission clearly has implications in respect of the Airport Surface Access Strategy, the Framework Travel Plan, and the Limits and Thresholds set out in the Green Controlled Growth. Importantly, it has an impact on issues of fly parking and other less sustainable modes of access to the airport, particularly when as confirmed by Mr Matthew Rhodes on behalf of the Applicant, the level of long term off-airport car parking is expected in the foreseeable future to remain at the same percentage level as is the case at present (5% - Document APP-205 Table 9.5).
- 1.11 Thirdly, I note from Document EV9-007 that action point 17 requires the Applicant by Deadline 3 to provide the terms of reference for the Airport Transport Forum to be shared with the local authorities. I should be grateful if the Examining Authority could

request that the Applicant provide the same information to my clients, given the representations raised on behalf of Holiday Extras Ltd in Document (Document REP1-073), along with the comments made by the writer at ISH4 on traffic and transport. Justification in seeking this request stems from the Applicant who has highlighted the relevance of collaboration between Luton Rising and other stakeholders, including the important contribution made by my clients to airport related passenger car parking provision.

2.00 FLY PARKING

- 2.01 Fly parking, in the same way as other less sustainable modes of access to the airport, is not a topic which can be isolated from the wider, more holistic consideration of surface access modes generally to LLA. The negative impact of fly parking is magnified by the fact that LLA lies in close proximity to an urban area comprising residential development, open to indiscriminate on-street parking as well as parking on the driveways of houses.
- 2.02 However unpalatable this mode may appear in terms of the aim of current Government policy to increase passenger and staff numbers using public transport to access the airport, fly parking also provides the resident population with the opportunity of generating increased income. This is a factor required to be seen in a wider context, with Luton comprising one of the 20% most deprived districts/unitary authorities in England, with approximately 19% (9,960) children living in low-income families.
- 2.03 It is a matter of public record that in 2017 the Local Highway Authority carried out a consultation exercise following complaints from residents living in the Vauxhall Park area of Luton, extending between Lineham Road and Eaton Green Road encompassing the intervening areas. The response was that one area requested the introduction of parking restrictions, but the wider area did not favour such restrictions. No Traffic Regulation Orders were brought forward at that time, although monitoring remains important in assessing the situation.
- 2.04 Fly parking arises as a consequence of the wide choice of access modes available to the airport, a consideration assessed in a document published in February 2018 by Transport Focus, who in conjunction with Heathrow Airport and the Department of Transport commissioned a programme of research to examine two issues: (i) what drives choice of

airport and how decisions about surface access to airports are made; and (ii) where coach fits into the consideration set for long journeys, what are passengers experiences and perceptions of coach travel. The same document states that consumers intuitively run through a hierarchy of considerations when making a trip abroad, asking a series of questions, being those reproduced below.



2.05 The same publication then proceeds to consider the choice of airport to fly from, at which time the cost of the flight was found to be the priority:

Passengers typically focus far more on the cost of the flight than the cost/ effort of getting to the airport at the time of booking

For some passenger types, cost/ effort of getting to the airport is higher salience

Tendency to focus on the 'here & now' and what is perceived as the 'big ticket' item (i.e. air fare)

Passengers more remote from major airports (e.g. Newcastle) more likely to consider the whole cost/ effort of the journey

Decisions are often habitual

- 'Always' fly from one airport and reluctant to consider others
- Regular trips (e.g. to visit family)
 - May reflect consistently **cheaper prices** from a certain airport, but passengers may default to a particular journey as long as prices not significantly different
- More **frequent/ experienced passengers** will intuitively factor-in mode and cost of getting to the airport at time of booking flight

There are certain things like, is it easy to get the skis to the airport, but it really just depends on price
Nottingham, Holiday

I got the flight from London right. But stupid me, didn't even think that getting down to London would actually be more than the flight!
Newcastle, Holiday

But many only consider non-flight costs later...

- Can leave passengers feeling frustrated with costs and effort involved

I mean it's price, if it's the same price to go to from Gatwick or Stansted then you think about other things
Norwich, Holiday

2.06 Where there is a perceived choice of airport, time and cost of getting to the airport come into play, a matter highlighted in the diagram below:-

Passengers will naturally usually look for airports in their region

If price is reasonable and the airport serves destination, choice is obvious

The decision is often intuitive

- Passengers may instinctively know that an airport is too far for them to travel (e.g. a London airport for those living in the North)
- The exception to this is especially cheap deals

Every time I consider my holiday options, they are often based around flying from a local airport, sometimes I've based it around Norwich Norwich, Holiday

Where there is greater perceived choice many passengers weigh-up...

The distance needed to travel with cost of travel

- *Should I have a more strenuous and less convenient journey to the airport but save money?*
- *Or should I spend more money than is necessary and enjoy a short trip to the airport?*

So if a flight from like East Midlands is £30 more expensive than a flight from like, I don't know, Newcastle, then obviously you'd go from there, so for money and time. Birmingham, Holiday

And there are exceptions, where passengers will prioritise other factors over cost

Where time and effort involved in getting to and from the airport can be a higher priority than cost:

- Business trips – 'not my money'
- Special occasions (e.g. honeymoon) – journey experience more important than cost
- More affluent passengers

If the airport is logistically inaccessible e.g.

- No direct rail route
- Inaccessible for disabled people

But rarely will a passenger will choose a more expensive flight to take their favoured mode of transport to the airport

2.07 Research undertaken by Transport Focus showed that the practical challenges at that airport are not always thought about until shortly before departure:

Passengers identify various practical challenges at different airports, including:

- Lack of, or perceived expensive, parking
- No train station
- Difficulty navigating to/ within airport

Frequent travellers often aware of specific airport 'idiosyncrasies' e.g. parking costs

- Can sometimes impact decision on airport choice *at the margins*

Parking can be a bit far from the actual terminal I find, so sometimes I get the meet and greet Birmingham, Holiday

But while practical difficulties can be challenging, they are not typically top of mind

- If not used airport before, typically unaware of any potential problems

Most passengers do not consider these issues when booking tickets and choosing which airport to fly from

However, these can be a more serious concern for disabled passengers (see later)

2.08 Modal choice is also in part a function of location: the further away from urban centres the origin is, the more limited are perceived choices:

Urban Areas

- Widest perceived public/ private transport choice
- Public transport in urban areas (esp. London) may often be quicker, cheaper and easier than driving or taxi
- Time and effort *to get to* public transport hubs can also be a factor (e.g. walking to tube with luggage may be problematic)

I live in a rural area, with almost no buses, and infrequent trains. Getting to and from public transport stations would still mean having to use a taxi or get a lift from family
Warwickshire, Ethnography

[staying overnight in a hotel] allowed us a stress free journey to Heathrow this morning (where as we'd have left at 6am otherwise)
West Midlands, Ethnography

Suburban Areas

- Journey to the airport often requires more than one mode **unless** driving or taxi
- Can mitigate in favour of private transport

Taxis just drop you outside your door, and you haven't all got to cram into a car and stress.
Birmingham, Holiday

Areas not served/ little served by public transport

- Again journey to the airport often requires more than one mode unless driving or taxi
- In rural/ remote areas journey to public transport hub may necessitate use of private transport
- As such, often default to private transport for entire journey



Long distance travellers may opt for an overnight stay pre-flight to avoid risks inherent in lengthy trip to the airport

2.09 Passengers often feel they have more choice going **from** the airport than **to** the airport:

Passengers may take a cheaper mode of transport home to offset an expensive journey to the airport

- Some feel that journey to the airport is a high-stakes trip, requiring a more 'reliable' mode like train or taxi so they don't miss their flight
- Others felt compelled to take an 'expensive' mode due to their departure time
- The journey home has less risk and may be an opportunity to save money

Others may feel that after the exhaustion of a long plane journey, they need a more comfortable journey for the final stretch

- May spend more money on modes such as taxi or train

We're waiting for a local bus now: it's the afternoon now, we have time. The weather's good...We're all rested, and it's not 3:30 in the morning
Stansted, Intercept

Taxi, because it was four in the morning and there are no buses. It's a crying shame [...] £80 on taxis; not good. [Coach] is cheap; it's £15 instead of £80. It'd be much better if we could have it both ways
Stansted, Intercept

2.10 The analysis of passenger behaviour results in the formulation of a modal choice matrix based on a range of criteria which has been indicated overleaf, from which it can be seen that the private car is the preferred option for passengers, particularly those travelling as a family or wanting to travel autonomously:

When considering which mode to take, passengers have a range of criteria that is important to them (based on a combination of actual experience and perceptions)

Availability

- The extent to which the mode is available to the passenger
- Passengers also consider 24 hour availability

Reliability

- Important for reducing stress and providing passenger confidence that they will arrive on time

Comfort

- How much the passenger will enjoy the journey

Convenience

- Time and effort that is required to make the journey

Value/affordability

- Whether passengers see the option as viable for their budget

		Modal choice					
		Coach	Car	Taxi	Train	Getting a lift	The tube
Criteria	Availability	✓ ?	✓ ?	✓ ✓	✗	✗	✗
	Reliability	✗	✓ ?	✓ ?	✓ ?	✓	✓
	Comfort	✗	✓ ?	✓ ✓	✓	✓ ✓	✗
	Convenience	✗	✓	✓ ✓	✓	✓ ✓	✓
	Value/affordability	✓ ✓	✓ ?	✗	✗	✓ ✓	✓ ✓

2.11 The assumed advantages and drawbacks of travelling by car to the airport are highlighted below to which additional negative factors may be included relating to carbon emissions and air quality:

Assumed benefits of travelling by car to the airport

- Self-reliance: many see the car as 'their bubble', and this 'safe zone' can feel helpful in stressful times
- Often seen as more cost-effective than public transport (esp. if in a group)
- Practicality of carrying luggage/ transporting children
- Flexibility of being able to change route depending on traffic
- Often seen as more cost-effective than public transport (esp. if in a group)
- Getting a lift with family/ friends provides all the benefits with little/ no cost

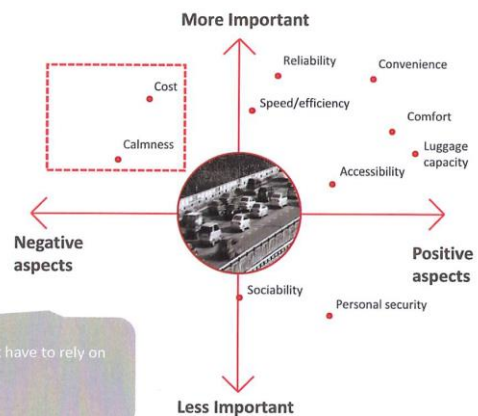
Assumed drawbacks of travelling by car to the airport

- Stressful if any unanticipated issues (e.g. traffic jams)
- Many do not want the 'chore' of driving to the airport and/ or do not want to drive if tired/stressed after return flight
- Leaving car at airport often seen as expensive
- Those relying on a lift do not always like to ask family/friends

Concerns are what happens if I miss my flight? Worse yet what happens if I miss my flight cause the tube is stuck or the train delayed?
London, Ethnography

I'm comfortable in the car and glad I don't have to rely on taxis and public transport
Warwickshire, Ethnography

Positive and negative aspects of car travel, with their relative importance:



2.12 It can be seen that one of the more important negative aspects of car travel is cost which in terms of fly parking, is affected by the price of comparable parking products, with a disproportionately greater impact becoming evident in cases of longer journeys, where the alternative of using public transport modes involve interchanges.

2.13 Price relating to alternative on and off airport car parking products is an important determinant in the extent of passenger fly parking, although less significant in the case of

staff fly parking. Particularly relevant in any consideration of fly parking is the inherent contradiction between the understandable aim of reducing access by private car mode, and the need to maximise the revenue stream of an airport. The latter is important in supporting the Sustainable Transport Fund, with on-airport car parking provision being a significant contributor to airport income.

- 2.14 In this regard, the local community have raised genuine concerns about the high cost of parking on airport which in turn has resulted in inappropriate parking stress in surrounding residential streets. The response from Luton Rising to early comments was set out in the 2019 Statutory Consultation Feedback Report Appendix A Part 2: Response to 2019 Feedback, was as follows:

“Drop off/parking charges will be/are set by the operator, however we are seeking powers to introduce additional charges for road uses accessing the airport in order to encourage sustainable modes of transport. Further information can be found in the SAETS. In the application for development consent, we will develop proposals into a clear framework to govern the setting and varying of charges. This will made clear how decisions will be made and set out the process to be followed before new charges could be imposed or existing charges varied.”

- 2.15 Table 1 below sets out a series of short and long term on airport passenger parking costs at major UK airports as at 20 April 2023.

TABLE 1
Comparable Short and Long Stay Passenger Car Parking Costs at
Major UK Airports 20th April 2023

Airport	Short Stay Costs	Long Stay Costs
Gatwick	£45 per day (if not pre-booked)	£25 first day; £20 thereafter (if not pre-booked)
Heathrow	£77.10 per day	First day £34.70; subsequent days £27.90 (off-peak)
Stansted	£69.99 for eight days in October pre-booked; £368 for eight days in October if not pre-booked	£55.99 for eight days in October if pre-booked; £172 for eight days in October if not pre-booked
Luton	£67.50 per day if not pre-booked	£30.00 per day if not pre-booked
Manchester	£79.99 for eight days in October - pre-booked only	Long stay parking closed
Edinburgh	£44.99 for seven days pre-booked; £2790 for seven days not pre-booked	£28.99 for seven days pre-booked; £154.00 for seven days not pre-booked

- 2.16 A hypothetical exercise was referred to in paragraph 8.26 of the representations raised by Holiday Extras Limited at Deadline 1 (Document REP1-073). An examination of pages 27 and 28 of the same document reveals the availability and cost of a parking space on a

private driveway of individual residential properties lying in close proximity to LLA, required from 0400hrs on 31st August 2023 in order to catch an early morning flight, leaving the vehicle at the same address until 22.30 on 5th September 2023. A comparison between this hypothetical exercise and Table 1 above highlights why in terms of price, reliance placed on technological platforms such as JustPark is seen by certain passengers as an attractive alternative in accessing LLA, irrespective of the negative consequences of increased congestion, carbon emissions and reduced air quality.

- 2.17 Fly parking results in the same disbenefits associated with technological platforms, but with the added adverse impact of indiscriminate parking on surrounding residential streets leading to problems of traffic congestion. The key to reducing fly parking lies in removing the incentive on which the passenger relies, being the absence of parking charges, with the obvious deterrent involving the introduction of parking restrictions/residents parking zones, albeit that relying on such instruments is likely to encourage other less sustainable modes of access to LLA, i.e. kiss-and-fly, with implications in respect of modal share targets in travel plans and Thresholds and Limits relating to Green Controlled Growth.
- 2.18 Representations raised at the earlier "*called in*" application seeking an increase in passenger throughput from 18 to 19mppa reveal there was an absence of any unanimity amongst residents over the question of whether parking restrictions/residents parking zones in residential streets close to London Luton Airport, should be imposed. It is considered that in the event of monitoring revealing a need for the imposition of Traffic Regulation Orders, this will result in an increase in other less sustainable modes of access to the airport. In this scenario, passengers will turn to reliance on technological platforms, of which JustPark is one company, with consequential difficulties of enforcement.
- 2.19 This situation in turn is likely to be exacerbated if only as a consequence of the Applicant's acceptance that the DCO application will result in additional journeys made by private car to LLA, in spite of measures to increase public transport patronage. In this regard the number of kerbside spaces available for drop-off purposes is intended to increase from 56 in Phase 2A to 100 in Phase 2b, with kerbside spaces for taxis also increasing from 16 to 49. Over the same period bus bays are to increase by 1 and coach bays are to remain the same over both phases. A combination of these factors, along with

the aim incorporated into the Framework Travel Plan of encouraging the efficient use of taxis and private hire vehicles, coupled with the absence of any controls in the same document concerning the least sustainable means of access to the airport, is likely to lead to unintended consequences in terms of modal share.

2.20 Whilst increased enforcement through traffic regulation orders/residents parking zones may reduce unauthorised on-street car parking, the same activity is dependent on peak departure and arrival profiles of flights operated by low cost carriers, being most prevalent in the early hours of the morning and late at night. In my client's view, at a time when certain aspects of surface access lie outside the current and future control of the airport, the provision of a low cost satellite passenger car parking facility should be considered, whose operation would be organised in a way which would meet the underlying aims in terms of modal share through the Airport Surface Access Strategy, Framework Travel Plan and Green Controlled Growth provisions, whilst at the same time balancing the need to ensure any enforcement of on-street passenger car parking remains effective and is not undermined. This solution has not been considered as a reasonable alternative by the Applicant.



- 2.21 This suggestion has to be seen in context, given that pre-Covid mid and long term on-airport car parking was found by those advising Luton Rising to operate at near capacity between May and September 2019.
- 2.22 In the pre-Covid period, my clients had discussions with members of Slip End Parish Council. Initially these discussions emanated from a concern raised by the Parish Council that passengers were parking their cars on neighbouring residential streets and taking the Airparks bus service direct to the airport. It was pointed out by my clients that this was not the case, a matter supported by available CCTV footage on their site at Slip End which for security and surveillance purposes is regularly monitored.
- 2.23 It was during the same time period that local residents relied on Airparks' buses to transport them on their buses to the airport, as there was no other direct public transport connection from Slip End to LLA. In order for local residents to take advantage of this free service, they were required to produce a utility bill or driving licence indicating their name and address, with regular monitoring of CCTV footage on site to ensure the same facility was not abused by those involved in fly parking on surrounding streets. I am reliably informed that the drivers of Airparks' buses were familiar with those local residents wishing to take advantage of this service.
- 2.24 The contents of page 7 of Part 2 of the Transcript of Recording of Issue Specific Hearing 4 (Document EV9-006) at points 16:50 and 17:12 refer to the Airport Transport Forum being open to the inclusion of other organisations who have a relevant part to play in the delivery of the plan and its implementation. It is circumstances such as those described in the preceding paragraphs which reveal that Holiday Extras Ltd through their subsidiary company Airparks, have a role to play in contributing to surface access objectives, lessening the number of journeys to and from the airport by private car, reducing congestion and carbon emissions and improving local air quality, whilst at the same time providing a public service to local residents.

3.00 ON-SITE PASSENGER CAR PARKING SEEN IN THE CONTEXT OF LONG TERM OFF-AIRPORT CAR PARKING PROVISION

- 3.01 Table 6.12 set out in Document AS-123 reveals passenger modal split at 2019 at 18mppa taken from detailed CAA passenger survey data. It can be seen that public transport comprising bus/coach and rail/MPT amounts to 38% of modal share with 52.7% of

modal share comprising private car, taxi and mini cab. These figures are required to be analysed in the context of a number of related considerations.

- 3.02 Firstly, pre-Covid use of on-airport car parking data, during the period May to September 2019 confirms that both mid and long stay car parking was operating at or near capacity. At 2043, at a throughput of 32mppa, modal share of long term off-airport car parking provision is expected to remain at 5%, equating to 1.6mppa. Airparks assume 2.5 passengers per car/booking, resulting in 640,000 cars/bookings per annum. Taking an average figure of 150,000 bookings per annum at Airparks Slip End site, reveals a contribution made by my clients towards long term off-airport passenger car parking of only 23% at 2043 at a throughput of 32mppa. Even if one then assumes current provision made by other existing long term off-airport car parking operators, the collective contribution along with Airparks would amount to less than 30% of the required long term off-airport passenger modal share car parking figure of 5% at 2043. This factor reinforces my client's opinion that a satellite long term off-airport car parking facility should have been considered as an alternative as part of the DCO application.
- 3.03 Secondly, only a limited increase in mid and long stay on-airport passenger car parking provision is envisaged between 2022 and 2043 at which time a throughput of 32mppa is expected. An increase of 1300 mid stay on-airport passenger car parking spaces and an additional 2050 long stay on-airport passenger car parking spaces is envisaged during this 21 year period. In short, an additional 3350 spaces are to be provided for these two categories of on-airport passenger car parking. The significance to be attached to my client's site at Slip End in providing for airport related passenger car parking was a matter referred to in comments raised on behalf of Holiday Extras Ltd at the Deadline 2 stage, (Document REP2-060), at which time it was revealed that my client's site at Slip End operating at capacity (5,500 spaces), is commensurate with providing long term off-airport car parking equivalent to 84% of the total long stay on-airport passenger car parking spaces expected in 2043 (6,550 spaces).
- 3.04 Thirdly, there has been much discussion about comparability seen in terms of passenger profiling between London Luton and London Stansted Airports. This has led to London Stansted Airport being identified as a main comparator when assessing levels of public transport mode share which could reasonably be achieved at London Luton Airport.

Public transport provision at both airports cannot be viewed independently from airport related car parking.

- 3.05 It is the figures relating to mid and long term on-airport passenger car parking spaces which are relevant when considering future long term off-airport car parking provision. Interestingly, London Stansted Airport in 2017 accommodated 27,050 spaces, at which time passenger throughput was 27.9mppa. In 2017 car parking spaces for mid and long term passengers at London Stansted Airport equated to 1 space per 1030 passengers. An equivalent figure of 1 space per 1022 passengers at London Stansted Airport arises at a throughput of 43mppa, given that the same airport envisages an increase of between 15,000 and 25,000 car parking spaces to cater for the throughput of 43mppa.
- 3.06 Mid and long term car parking provision at London Luton Airport at 32mppa amounts to 10,200 spaces, resulting in 1 space per every 3,137 passengers. There is a high correlation between estimates of passengers travelling between 2 and 7 days at both airports, with the figure for LLA contributed to 68%, with that at London Stansted Airport comprised 69%, indicating the significance to be attached to mid and long term parking at both airports. [para 4.3.4 of the Document APP-202]
- 3.07 Fourthly, the Applicant in Document REP2-030, refers to one car parking space on airport per 1,706 passengers in 2019, ($18,000,000 \div 10,550$) but this does not take into account the loss of spaces in the mid term car park due to the construction of the DART. The Applicant calculates a figure of one on-airport car parking space per 2,000 passengers ($32,000,000 \div 16,000$) in 2043 at a passenger throughput of 32mppa.
- 3.08 It is my client's view that the one car parking space on-airport per 1,706 passengers is a baseline figure, which is attributable to all forms of on-airport car parking including short stay. In the period between 2019 and 2043, passenger throughput is expected to expand by 14,000,000 or 74% ($14,000,000 \div 19,000,000 \times 100$) above the baseline, during which time mid and long stay on airport passenger car parking is to expand by 3350 spaces, equivalent to 1 space per 4,179 passengers.
- 3.09 Whether one takes the figure of 1 space per 2000 passengers as advocated by the Applicant, which includes short stay car parking; or the figure of 1 space per 4,179 passengers, which is the increase above the baseline of 18mppa in 2019 through to

32mppa in 2043 concerning mid and long term on-airport car parking; the provision at LLA is well below its comparator airport London Stansted. This difference has to be considered in the light of the fact that long term off-airport car parking operators are expected to maintain the same percentage passenger modal share in 2043 as they do today.

- 3.10 Fifthly, there is a relationship between the requirement to adhere to threshold and limit values where they concern air passenger non-sustainable mode share; modal share figures set out in the Airport Surface Access Strategy and Travel Plans, and considerations of price relating to the particular passenger car parking product. With this in mind, no assessment has been undertaken of the impact that variations in charges applicable would have on the use of certain non-sustainable passenger modes e.g. kiss and fly/taxi usage, and the extent to which variations in charges impact on targets thresholds and limit values contained in the Airport Surface Access Strategy, Travel Plans and Green Controlled Growth. The relevance of undertaking this exercise is that it effects the Applicant's revenue stream, important in an understanding of the extent of available finance to service the Sustainable Transport Fund.
- 3.11 The extent to which LLA's catchment area both now and into the future would be affected by variations in charges for certain non-sustainable travel modes as part of surface access demand management is also relevant, if only to ascertain whether any relationship can be identified with the need to pump prime any selected public transport provision.
- 3.12 The Examining Authority will have noted from Document REP1-073 prepared by Holiday Extras Limited at the Deadline 1 stage an exercise which looks at UK postcode bookings of passengers arriving at Slip End between 0000hrs and 0900hrs, and those passengers departing the same site between 2200hrs and 0400hrs over the period from 11th August 2023 to 10th August 2023. The same study results in the identification of a number of sub-catchment areas being attractive to those using Airparks' facility.
- 3.13 There is a predominance of passengers whose origins extend northwards along the M1 Motorway towards Nottingham, and north eastwards towards Peterborough. Similarly, a separate catchment area extending westwards towards Oxford and Reading is apparent, with a diverse mix of passengers living in Outer London and Kent, as well as in close

locations, Hemel Hempstead and Stevenage featuring prominently. In a number of cases, it is in those locations where comparisons between journey times by car and by public transport are at their widest, and where the requirement for passenger interchanges are involved which results in passengers choosing to rely on the long term off-airport car parking facility at Slip End. The results are required to be seen in the context of earlier discussions set out in this paper concerning choice, customer behaviour and how decisions surrounding surface access are made.

4.00 CONCLUSION

- 4.01 This document has revealed that the Applicant is not in a position to control a number of aspects of unsustainable modes of transport used by passengers accessing LLA, relying on collaboration with others, including local highway authorities. This brings into play whether the Thresholds and Limit values set out in the Green Controlled Growth Framework, and those targets found in the Airport Surface Access Strategy and in the Framework Travel Plan have been devised so as to reflect the inability to encompass all the unsustainable modes of access to the airport. There is a need for the Applicant to enter into open and transparent dialogue with my clients over airport related car parking, since this is the only mechanism which ensure mutual benefit and understanding.
- 4.02 It appears to the writer there are a number of unintended consequences arising from the details accompanying the DCO application which have not been fully assessed and for which there is an absence of controlling mechanisms. This has an impact on the extent of those beneficial consequences for surface access generally, as well as the expectations of the local community. The extent of available contributions to comprise the Sustainable Transport Fund is unknown.
- 4.03 In a number of cases issues have been left for future consideration through travel plans or through the TRIMMA. To ensure ongoing cooperation between stakeholders and others involved in surface access requires active engagement, opening up attendance at the Airport Transport Forum, along with proper coordination with the Technical Panel relating to surface access where it concerns Green Controlled Growth, if only to allow for the obligations set out in the DCO application to be effectively monitored.