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**Comments on behalf of Holiday Extras Ltd in Response to the decision taken
by the Secretary of State on 13th October 2023 to allow a called-in application
in respect of Reference No. 21/00031/VARCON made by
London Luton Airport Operations Ltd**

PINS Ref No. TR020001

Deadline 4

Registration Identification No. 20039891

1.00 INTRODUCTION

- 1.01 Certain considerations set out in the Report prepared by the Panel of Inspectors into the public inquiry relating to the called-in application Reference No. 21/00031/VARCON have already been referred to in earlier representations made on behalf of Holiday Extras Limited to the current DCO application, **[REP1-073; REP2-060; REP3-118]** and hence do not need to be repeated.
- 1.02 There are nevertheless a number of points which my clients feel should be highlighted arising from the resultant Report of the Panel of Inspectors, where it is directed at airport related passenger car parking, which are relevant in considerations relating to the current DCO application.

2.00 FIRST ISSUE

- 2.01 The case advanced on behalf of LLAOL at paragraph 8.77 of the Inspectors' Report (IR8.77) mentions that since 2019 public car parking capacity had increased by 22.3% and that there would be sufficient capacity to accommodate the additional 1m passengers sought by the application. This increase in on-airport car parking capacity since 2019 when the passenger throughput at London Luton Airport was 18mppa, is required to be compared with a proposed increase of 6,100 on-airport car parking spaces for all forms of on-airport car parking product over a 21-year period from 2022 to 2043, during which time passenger throughput is expected to increase by at least 13mppa.
- 2.02 These figures raise concerns as to whether on-airport passenger car parking provision comprising part of the DCO application will be sufficient, and what contingency plans exist to remedy any shortfall should the number of on-airport car parking spaces be found to be deficient in the future.
- 2.03 This raises similar issues to those highlighted in my client's representations at Deadline 3 **[REP3-118]**, namely, what methodology has been adopted by Luton Rising in arriving at the figures relating to the proposed short, mid and long term on-airport passenger car parking spaces over the three phases of the DCO application, and importantly how have they been devised.

3.00 SECOND ISSUE

- 3.01 In the case of the proposed development allowed by the Secretary of State on 13th October 2023, the Local Planning Authority, Luton Borough Council refers to the Car Parking Management Plan (hereinafter referred to as CPMP) forming an important instrument in managing on-airport passenger car parking provision through pricing, ensuring an appropriate balance between supply and demand (IR9.37).
- 3.02 The current DCO application relies on a number of instruments through which on-airport passenger car parking provision is to be managed, namely through targets set out in the Airport Surface Access Strategy (ASAS); Framework Travel Plan (FTP) and related five year Travel Plans (TPs) and Thresholds and Limits set out in the Green Controlled Growth Framework (GCG). In the light of these circumstances, it appears to my clients that the price of future airport related parking products still remains an important determining factor in controlling on-airport related passenger car parking demand, with the Applicant continuing to have little control over the price of alternative means of access to the airport by public transport.

4.00 THIRD ISSUE

- 4.01 The Panel of Inspectors in their conclusions at IR15.119 state that a change in behaviour was also needed to achieve wider environmental objectives and safeguard the amenities of the surrounding area, at the same time referring to what was confirmed by the LPA's planning witness at the public inquiry, that surface access considerations was one of the reasons for the imposition of a passenger cap through Condition 8.
- 4.02 It is acknowledged that in the case of the current DCO application, the Applicant has introduced targets expected to be reached through the ASAS, TPs and GCG. The issue which my clients raise is whether these instruments are sufficient to result in a change in passenger behaviour to meet environmental objectives, and in particular safeguard the amenities of surrounding residential areas, especially through fly-parking. In short, to what extent does there remain a requirement for the imposition of passenger caps relating to the three phases of the DCO application?

5.00 FOURTH ISSUE

- 5.01 Table 9 entitled "*Key Travel Plan Targets and Performance (missed targets shown in bold)*" is incorporated into the conclusions drawn by the Panel of Inspectors in their Report at

IR15.125. This table sets out under the title “*Objective 1: Reducing Non-Electric Car Use*”, a target figure of 39% being a reduction in the number of passengers relying on non-electric car use during the period 2016 through to 2028. To what extent is this figure of passengers relying on non-electric cars considered to be appropriate in the current DCO application, or has it changed, since this will have implications in achieving wider environmental objectives? Furthermore, the same topic has implications in terms of fly-parking, particularly where passengers have an electric car and where access to charging points is limited.

- 5.02 In the case of “*Objective 2: Increasing the Use of Sustainable Modes*” forming part of Table 9 introduced at IR15.125, reference is made to a target figure of 47% of passengers accessing the airport by sustainable modes by 2024, which will be maintained through to 2028. These figures do not appear to relate to those figures set out in Table 9.5 Passenger Mode Split (person trips) taken from Document 7.02 Transport Assessment – Part 3 of 4 (Chapters 9-10) [APP-205].