



Tim North
& Associates
Limited

Chartered Town Planning
& Development Consultants

Maple Gate
Brampton Abbots
Ross-on-Wye
Herefordshire HR9 7JD

T: [REDACTED]

E: [REDACTED]

**Comments on behalf of Holiday Extras Ltd in Response to Any Further
Information/Submission received by Deadline 4**

PINS Ref No. TR020001

Deadline 5

Registration Identification No. 20039891

- 1.01 Representations were raised on behalf of my client, Holiday Extras Ltd, to the current DCO application prior to the Deadline 3 stage, as a direct consequence of Action Point 15 arising from Issue Specific Hearing on Traffic and Transport (ISH4) held on Thursday 28th September 2023. The resultant representations were accepted and incorporated in the Examining Library at **Document REP3-118**.
- 1.02 The resultant representations (**Document REP3-118**) raised a number of important points which emerged from the ISH4 held on Thursday 28th September 2023. It was stated by the Applicant and recorded as such in Part 2 of the Transcript of Recording of Issue Specific Hearing 4 [**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.” That comment is patently incorrect and requires correction, having been elaborated on in paragraphs 1.03 and 1.04 of **Document REP3-118**.
- 1.03 I raised in the same representations [**Document REP3-118**] at the ISH4 meeting held on Thursday 28th September 2023 that a reading of all the submissions associated with the Transport Assessment revealed 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 devised. This is a matter which can be verified by the recording of Part 1 of ISH4 comprising **Document EV9-003**.
- 1.04 As indicated on behalf of Holiday Extras Limited in paragraph 1.08 of **Document REP3-118**, the Examining Authority have not been provided with any information on the methodology adopted in arriving at the figures relating to the 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. In contrast, I referred to **Document AS-125** in which the needs assessment methodology had been explained, but any comparison methodology appears conspicuous by its absence in any transport related document concerning future on-airport passenger car parking.
- 1.05 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. The kind of factors involved in individual methodologies relating to future provision of on-airport passenger car parking was highlighted in paragraph 1.09 of **Document REP3-118**.

- 1.06 As part of the same representations [**Document REP3-118**] emanating from the ISH4 held on Thursday 28th September 2023, reference was made to a response provided by Mr Matthew Rhodes on behalf of the Applicant which did not address the question raised, being concerned with matters of off-site car parking. Instead, the Examining Authority were directed to **Document AS-123** and in particular to Chapter 8 and paragraphs 8.3.37 to 8.3.51. My clients as well as the Examining Authority are fully conversant with the provisions of these paragraphs. 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. What is omitted from the Applicant's response was any information 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.
- 1.07 In cases where questions are raised by the Examining Authority, or where representations have been directed to certain specific matters concerning future on-airport passenger car parking figures, it is only reasonable that Interested Parties who have an obvious interest in on-airport related passenger car parking provision, are afforded the courtesy of a clear answer to the particular question raised. In this respect, and as the Examining Authority will appreciate, the resultant figures for short, mid and long stay on-airport passenger car parking at the three phases of the DCO application must have sound legitimate basis. Put simply, how have they been devised?
- 1.08 I have been looking for a response from the Applicant in its Deadline 4 submission to the points raised by my clients at the Deadline 3 stage, in accordance with Action Point 15 set out by the Examining Authority. A careful search of the Document revealed no response at all to the issues raised in Document **REP3-118**. The only response I have managed to locate amongst the 220 individual submissions is that found on page 30 of the Document entitled "**Volume 8 Additional Submissions (Examination) - 8.84 Applicant's Response to Deadline 4 Hearing Actions**" in which it is stated under the title "*Description of Action Point 15*" "*Mr North did not submit a response at Deadline 3*"

- 1.09 That is also patently incorrect, to the extent of bringing the process into disrepute.
- 1.10 I should therefore be grateful if the Examining Authority could request from the Applicant a clear and transparent response to the issues raised in these representations, which were originally set out in **Document REP3-118**.