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London Luton Airport Expansion

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**8.119 Applicant's Response to Issue Specific Hearing 4
Action 26 - Sustainable Transport Fund**

Infrastructure Planning (Examination Procedure) Rules 2010

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The Infrastructure Planning (Examination Procedure) Rules 2010

**London Luton Airport Expansion Development Consent
Order 202x**

**8.119 APPLICANT'S RESPONSE TO ISSUE SPECIFIC HEARING 4
ACTION 26 - SUSTAINABLE TRANSPORT FUND**

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1 INTRODUCTION

1.1 The Proposed Development

1.1.1 This document has been prepared to support the proposed expansion of London Luton Airport ('the Proposed Development'), proposed by Luton Rising (the Applicant). The Applicant is a business and social enterprise owned by a sole shareholder, Luton Borough Council, for community benefit.

1.1.2 The Proposed Development builds on the current operational airport with the construction of a new passenger terminal and additional aircraft stands. This will take the overall passenger capacity to 32 million passengers per annum (mppa). The existing infrastructure and supporting facilities at the airport, including transport infrastructure, will be improved to support the increase in demand.

1.2 Purpose and audience of this document

1.2.1 The primary purpose of this document is to set out the framework for the Proposed Development's future Sustainable Transport Fund (STF) and its governance, source, size and scope. It responds to Issue Specific Hearing 4 Action 26, which is to *"Provide an update on sustainable transport fund including indicative costs and how it would be secured"* [EV9-007].

1.2.2 This document outlines the existing approach to funding sustainable transport to/from the airport and why an STF is beneficial.

1.2.3 A summary of the content of this paper has been presented to the relevant planning authorities to inform the development of a Section 106 agreement (s106 agreement). Two engagement sessions took place during the w/c 18 September 2023:

- a. 19 September 2023: Transport Related Impacts Mitigation and Monitoring Approach (TRIMMA) and STF presentation and discussion with Central Bedfordshire Council, Luton Borough Council, North Hertfordshire Council, Hertfordshire County Council, Dacorum Borough Council (no attendee present) and National Highways.
- b. 21 September 2023: TRIMMA and STF presentation and discussion with Buckinghamshire Council.

2 THE NEED FOR A SUSTAINABLE TRANSPORT FUND

2.1 What is a Sustainable Transport Fund?

2.1.1 An STF is a defined pot of money used to fund improvements to sustainable transport options including services and infrastructure related to public transport, and cycling and walking. A number of UK airports with commercial passenger flights have an STF, including Stansted and Gatwick. These have been secured through s106 agreements.

2.2 Why is a Sustainable Transport Fund needed for London Luton Airport?

2.2.1 The key rationale for an STF for London Luton Airport (the airport) includes:

- a. Comparisons to other UK airports show that STFs have become a standardised approach to funding of sustainable transport improvements linked to expansion proposals.
- b. To demonstrate that funding will be available to support the delivery of interventions that will ultimately contribute towards the achievement of surface access targets, to be set, monitored and reviewed in future Travel Plans.
- c. In response to feedback from stakeholders citing an absence of clarity around how sustainable transport interventions contained in the **Framework Travel Plan [REP4-044]** would be funded. This was raised in Written Representations (WRs), Principal Areas of Disagreement Summary Statements (PADSS), Local Impact Reports (LIRs) and Statements of Common Ground (SOCGs) by authorities, for example:

“Insufficient detail is provided on the level of investment and responsibility for providing support for additional public transport services, this is mentioned in the application material but there is no commitment towards implementation... Details of who is the responsible party for securing, providing and funding additional public transport from the east of the airport. Expected programme for their introduction and where the funding will come from” (Statements of Common Ground with North Hertfordshire Council, Dacorum Borough Council and Hertfordshire County Council [REP2-022 – REP2-024]).

3 LONDON LUTON AIRPORT SUSTAINABLE TRANSPORT FUND

- 3.1.1 This section sets out the approach to be taken in developing the airport's STF, in association with the Proposed Development to expand to 32 mppa. It provides the detail around funding to demonstrate how interventions and measures set out in the **Framework Travel Plan (FTP) [REP4-044]** would be delivered.
- 3.1.2 A review of comparable airports has illustrated that a s106 agreement is the typical route for securing a STF.

3.2 Funding Source

- 3.2.1 The STF sets the framework for how surface access improvements identified in future Travel Plans will be funded. The source of the STF will be a levy on onsite car parking (short, mid and long stay) and passenger drop-off. The fund will be generated from a charge per transaction on passenger vehicles.
- 3.2.2 Currently, there is no charge (or transaction) for *Mid Stay Car Park - Gate* (Under 15 mins) and *Long Stay Car Park - Gate* (under one hour). Between June 2022 and May 2023 684,000 vehicles made use of this free period. The car parks and drop off zones that will contribute a levy to the STF are indicated in Table 3.1.

Table 3.1: Car parks included in the STF

Car Park Type	Inclusion in STF?
TCP 1 (Self-Park) - Gate	Yes
TCP 2 (Self Park) - Gate	Yes
Mid Stay Car Park - Gate	Yes
Long Stay Car Park - Gate	Yes
Drop Off Zone (DOZ)	Yes
TCP 1 (Self-Park) - Pre Book	Yes
TCP 2 (Self Park) - Pre Book	Yes
Mid Stay Car Park - Pre Book	Yes
Long Stay Car Park - Pre Book	Yes
Priority Parking - Pre Book	Yes
Mid Stay Car Park – Gate (Under 15 mins)	No
Priority Parking – Pre Book	No

- 3.2.3 No levy will apply to staff parking, to avoid any potential for fly parking on roads around the airport, adversely affecting local communities.

- 3.2.4 The fund would be collected and administered by the airport operator, as the operator of the onsite parking and drop-off areas.
- 3.2.5 Funds would only start to be collected following the serving of notice to grow under Article 44(1) of the DCO, which triggers the transition from the existing planning requirements to those established under the DCO. This is assumed to occur in 2025 (for the purposes of the fund forecasting only).
- 3.2.6 The funding mechanism for the airport's STF is intended to be secured through a s106 agreement.

3.3 Fund Size

- 3.3.1 The fund has been sized based on the following assumptions and considerations:
- Full year data of parking and drop-off transactions up to May 2023, received from the airport operator, to determine a baseline vehicle demand.
 - Passenger forecasts from the **Need Case [AS-125]** for the Core Planning Case, Faster Growth Case, and Slower Growth Case.
 - The potential fund size has been calculated from the baseline number of transactions and factored up in alignment with the increase in parking supply outlined in Table ES.1 in the **Transport Assessment [APP-203]**, corresponding to each assessment phase. Between assessment phases, growth in revenue has been calculated proportionate to the change in passenger throughput, for each of the three cases. This assumes that the car park occupancy rate will be maintained for the duration of the Proposed Development. Actual fund size may vary if car park occupancy rates change over time.
 - Annual inflation forecasts from the Office for Budget Responsibility have been applied in the levy and revenues discussed in this document. However, it will be the role of the Airport Transport Forum (ATF) Steering Group to confirm levies on a yearly basis to account for actual inflation levels, and to determine the subsequent impact on the forecast fund size and cap.
 - The current (2023) levy has been set at £0.25 per passenger parking transaction and £0.10 per passenger drop-off.
 - No levy has been applied to parking products which currently do not have a charge: Mid Stay Car Park - Gate (Under 15 mins) and Long Stay Car Park - Gate (under 1 hr).
 - Scenarios with and without a maximum cap on the fund size have been explored.
 - The first year the levy would be collected is 2025 on the assumption that this is when airport's notice to grow will be triggered. Levy revenue for 2023 is shown in Table 3.2 to demonstrate what the fund size would be if it was currently being collected, based on the latest available data.
- 3.3.2 Table 3.2 presents existing passenger parking and drop-off transactions at the airport for the year June 2022 to May 2023. The levy defined above is applied to this data for 2023 to demonstrate the size of an STF for this same period.

3.3.3 It is noted that the TCP2 car park fire in October 2023 has affected the supply of passenger parking and drop off facilities at the airport. At the present time, it is difficult to state when the car park will re-open and so the potential value of funds raised by the car parking levy in the first year or two of the STF cannot be confirmed at this time.

Table 3.2: Current car park transactions at London Luton Airport

Paid Transactions	Number of transactions (Jun 22 - May 23)	Proposed levy	Levy revenue
TCP 1 (Self-Park) - Gate	208,000	£0.25	£52,000
TCP 2 (Self Park) - Gate	226,000	£0.25	£57,000
Mid Stay Car Park - Gate	62,000	£0.25	£15,000
Long Stay Car Park - Gate	36,000	£0.25	£9,000
Drop Off Zone (DOZ)	2,847,000	£0.10	£285,000
TCP 1 (Self-Park) - Pre Book	51,000	£0.25	£13,000
TCP 2 (Self Park) - Pre Book	82,000	£0.25	£20,000
Mid Stay Car Park - Pre Book	77,000	£0.25	£19,000
Long Stay Car Park - Pre Book	156,000	£0.25	£39,000
Priority Parking - Pre Book	27,000	£0.25	£7,000
Mid Stay Car Park – Gate (Under 15 mins)	311,000	£0	£0
Long Stay Car Park – Gate (Under 1 hr)	373,000	£0	£0
Total	4,456,000	-	£516,000

3.3.4 The number of current transactions outlined in Table 3.2 have been extrapolated to each of the assessment phases, to inform forecast annual revenue from the levy; the forecast annual revenue is presented in Table 3.3. The table follows the assumptions previously set out in paragraph 3.3.1 and presents annual revenue only for the year of each assessment phase that the passenger capacity is predicted to be reached in the Core Planning Case, explained in paragraph 3.3.5.

Illustrative Growth Scenarios

3.3.5 Table 3.3 lists the forecast annual revenue for the construction completion year for each assessment phase, with forecast transaction numbers based on existing transaction numbers, increased in proportion to the planned increase in parking provision. Figure 3.1 and Appendix A set out forecast total annual revenue for

every year of the expansion through to 2049, based on three future demand forecasts of passenger growth outlined in the **Need Case [AS-125]**:

- a. The **Core Planning Case**, where 32 mppa is reached in 2043; understood to be the most likely scenario.
- b. The **Faster Growth Case**, where 32 mppa is reached in 2042.
- c. The **Slower Growth Case**, where 32 mppa is reached in 2049.

3.3.6 Annual revenue has been mapped to the forecast mppa in these growth scenarios to illustrate how the annual and cumulative revenue may change over time.

3.3.7 Figure 3.1 shows that the final year of the Proposed Development (i.e. the year that the predicted passenger capacity of 32 mppa is reached) for all growth scenarios will see annual revenue of £1,215,926 (based on stated levy); this illustration does not include consideration of a fund cap, which is introduced later in this document. However, as each growth scenario suggests a different final year of growth, the accumulated revenue for this timeframe will vary.

Table 3.3: Forecast transactions and levy revenue for the Core Planning Case growth scenario

Baseline 2023, 18 mppa			
	Annual transactions	Levy	Annual revenue
Car parks	1,609,000	£0.25	£231,000
Drop Off Zone	2,847,000	£0.10	£284,000
Total	4,456,000	-	£515,000
Assessment Phase 1 2027, 21.5 mppa			
	Annual transactions	Levy	Annual revenue
Car parks	1,797,000	£0.27	£282,000
Drop Off Zone	3,193,000	£0.11	£350,000
Total	4,990,000	-	£631,000
Assessment Phase 2a 2039, 27 mppa			
	Annual transactions	Levy	Annual revenue
Car parks	2,085,000	£0.35	£415,000
Drop Off Zone	3,693,000	£0.14	£513,000
Total	5,778,000	-	£928,000
Assessment Phase 2b 2043, 32 mppa			
	Annual transactions	Levy	Annual revenue
Car parks	2,524,000	£0.38	£545,000
Drop Off Zone	4,463,000	£0.15	£671,000
Total	6,987,000		£1,216,000

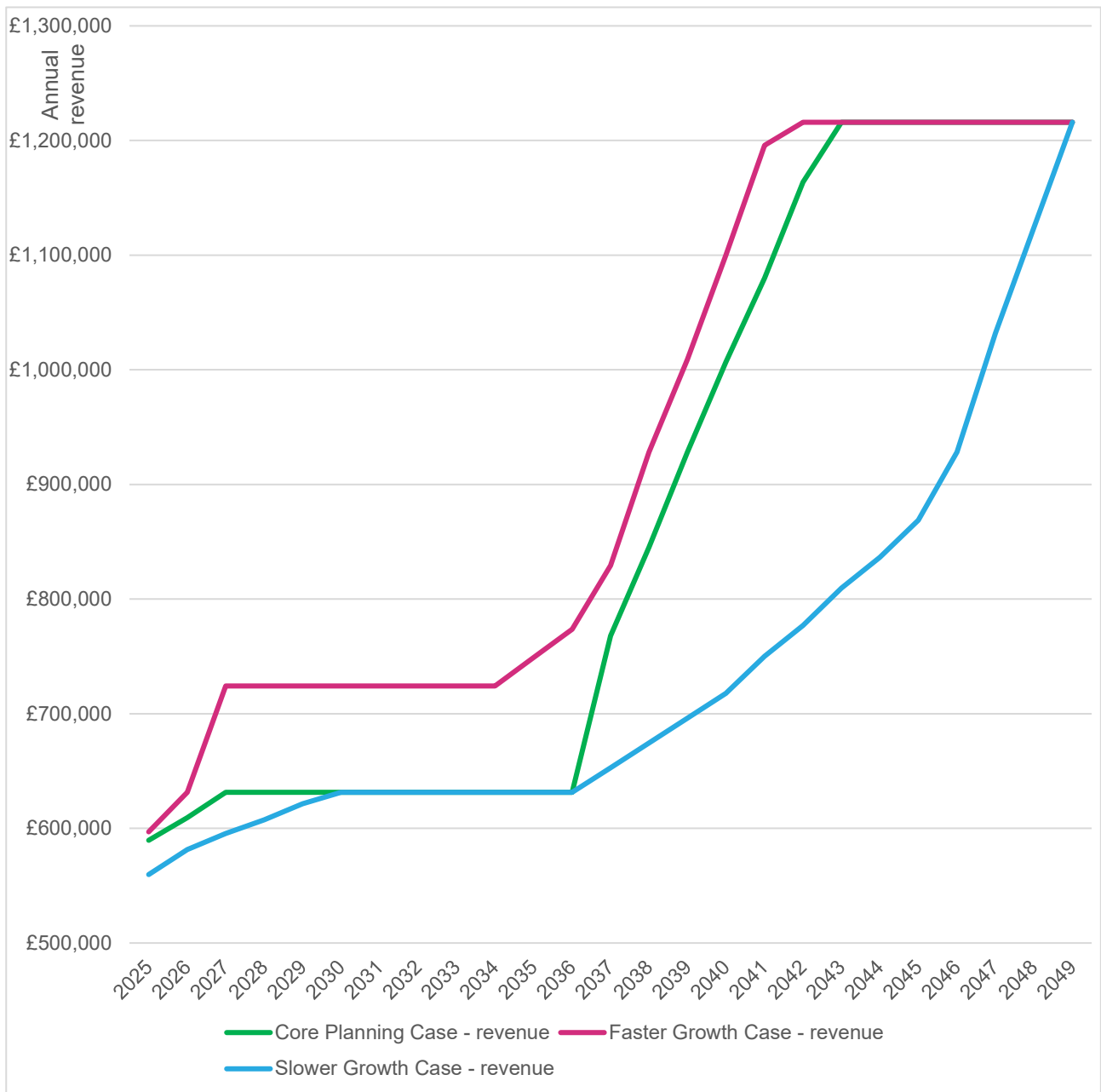


Figure 3.1: Forecast annual revenue across growth scenarios

3.3.8 As demonstrated by Figure 3.1, the passenger forecasts result in variations to the annual levy raised over time. In all cases, the total raised each year would increase until the functional capacity of Terminal 1 is reached (21.5mppa for the Core Planning Case and Slower Growth Case, and 23 mppa for the Faster Growth Case). There would then be a period of time where no further growth occurs whilst Terminal 2 is under construction, and therefore the annual levy would not increase. Finally, the growth in passengers would increase at varying rates up to the new passenger cap of 32 mppa, with the annual levy varying proportionally.

3.3.9 Figure 3.1 therefore highlights considerations when setting the fund size:

- a. Once the functional capacity of Terminal 1 is reached, there will be a prolonged period where no growth occurs, and the need for the STF might be diminished in this period; and
- b. A significant proportion of growth occurs long into the future, so funding must be available not just in the early years, but also in the latter stages of expansion, as the airport reaches its final operating capacity.

3.3.10 Comments received through engagement with relevant highway authorities have raised the need for the fund to be of a sufficient size in the early years to enable investment opportunities in new bus routes (subject to route viability analysis). The feasibility of this approach is under consideration.

3.3.11 Figure 3.2 shows the increases in passenger volumes over the delivery of the Proposed Development, illustrating that there are multiple years where no growth in passenger volumes are forecast to occur.

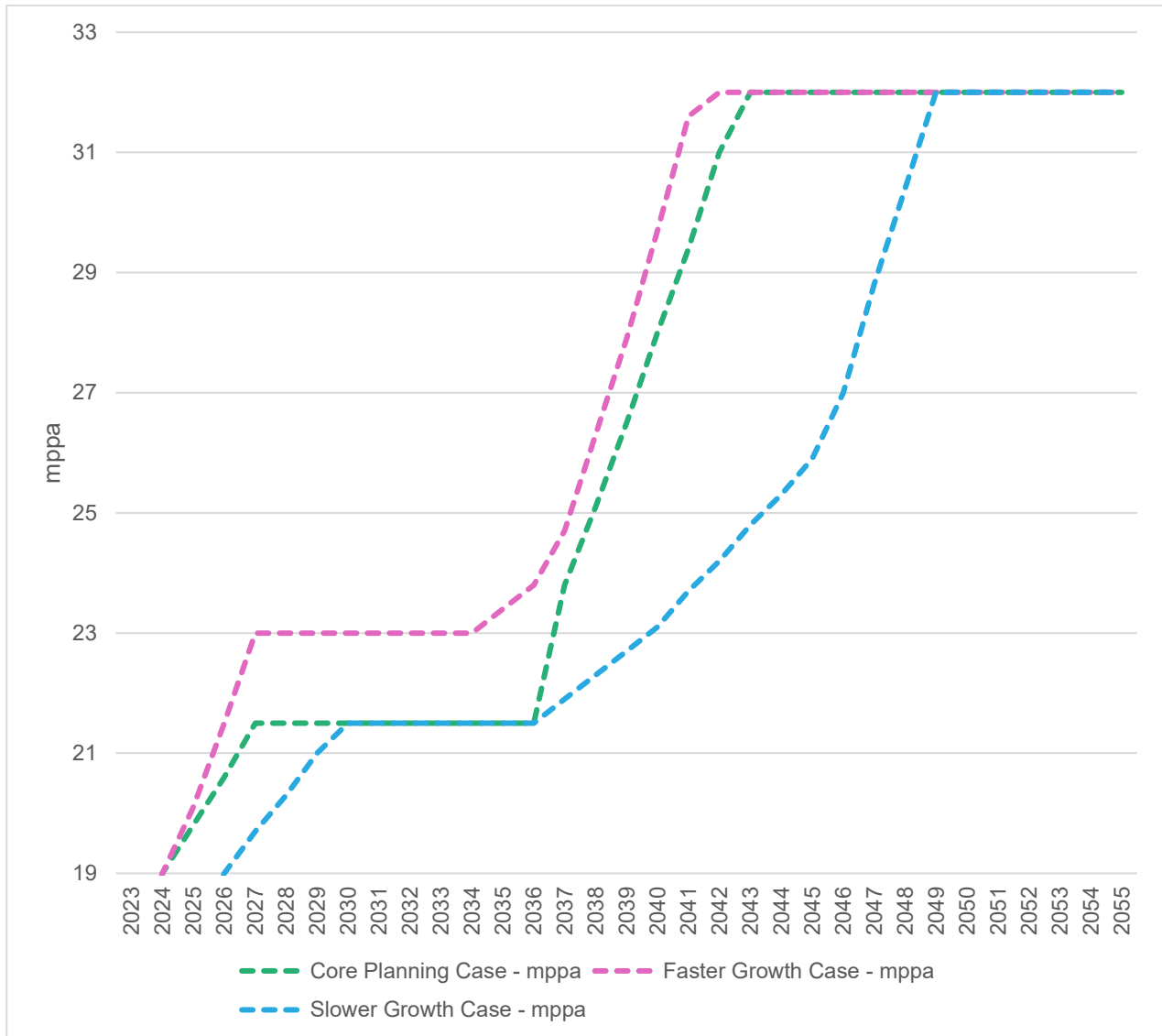


Figure 3.2: Changes in passenger volumes over the duration of the Proposed Development (mppa)

Approach to Capping Fund

3.3.12 The Applicant considers that a cap should apply to the overall fund size and/or duration, in line with approaches taken elsewhere (e.g. Bristol, Stansted etc). A cap provides certainty on levels of available funding to inform investment decisions on sustainable transport interventions, and the proposed mechanism for determining the cap ensures the availability of funding is linked to the operational impacts of the Proposed Development. A cap is also considered reasonable in the context of other ongoing surface access commitments made by the Applicant through the DCO, such as the ongoing need for surface access mode share Limits to be achieved, which applies in perpetuity. The proposed methodology for setting the cap is set out as follows.

3.3.13 It is proposed that the maximum size of the STF is reached when one of the following two scenarios is realised:

- a. Scenario A: the year in which maximum passenger throughput is first within 1 mppa of the DCO permitted cap.
- b. Scenario B: When the size of fund reaches £18.5m (the maximum cumulative forecast fund contributions via any of the growth scenarios), subject to any indexation agreed in accordance with 3.3.15 below.

- 3.3.14 This approach is considered appropriate because it ensures the fund is capped at an appropriate time i.e. when no/minimal investment in sustainable transport is required (because the airport will have reached its maximum capacity; Scenario A) or when the fund has reached the maximum forecast value.
- 3.3.15 For Scenario B, the ATF Steering Group will be responsible for reviewing the cap on a yearly basis; this will be informed by a review of the levies, which will be adjusted based on actual inflation. This approach ensures that a similar level of interventions can be delivered by the maximum size of the fund, despite any potential inflation-induced cost increases. Recommendations from the Steering Group to adjust the cap will be submitted to the operator to consider.
- 3.3.16 At the point that the cap is reached, the operator will review the role of the STF going forwards and how it can support business as usual operations, similar to ongoing STFs at other UK airports.

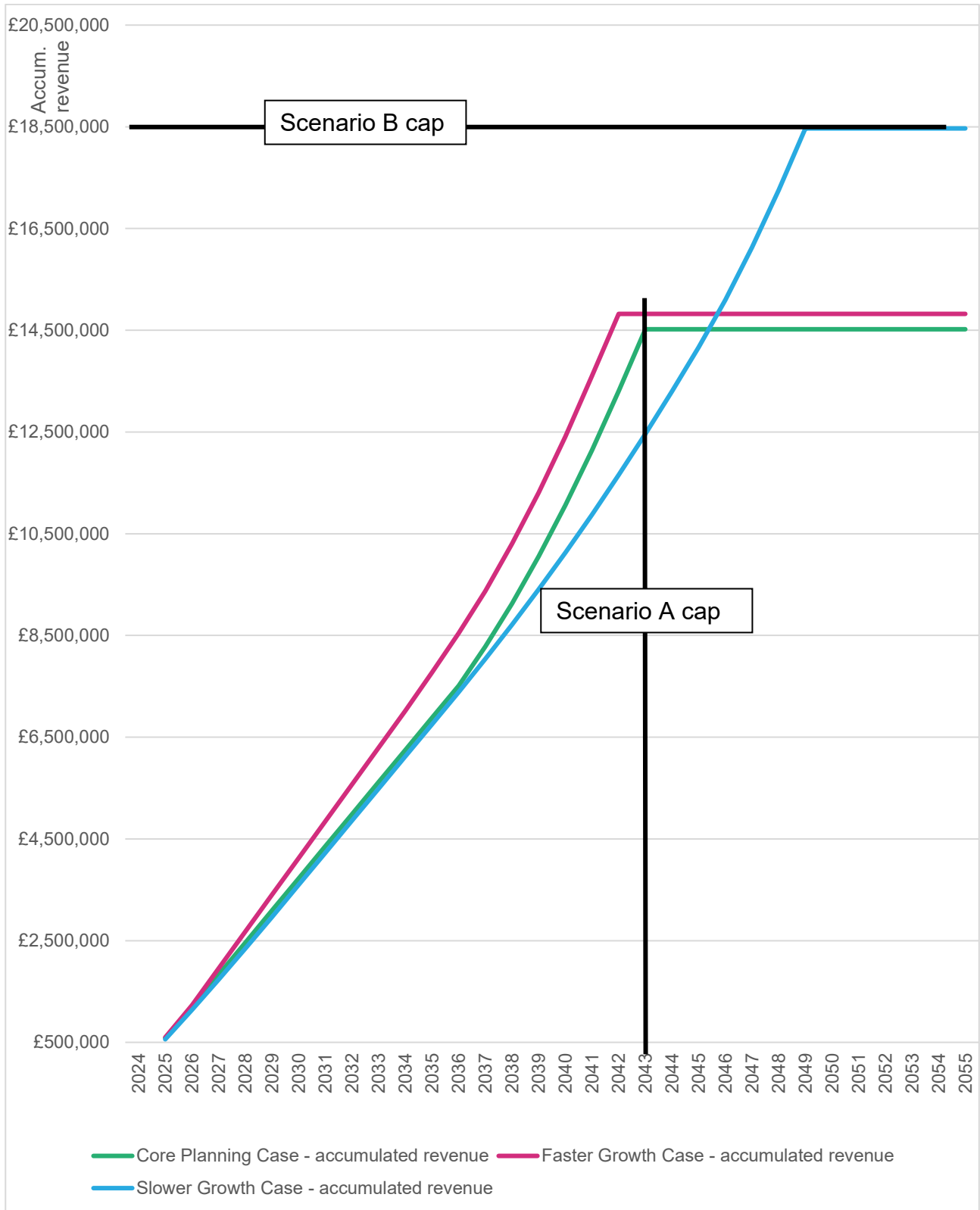


Figure 3.3: Forecast accumulated revenue across growth scenarios

3.4 Fund Scope

- 3.4.1 The STF's purpose will be to contribute towards realising the **Surface Access Strategy's [APP-228]** Vision, Objectives and Priority Areas as set out in the successive Travel Plans, with focused funding of interventions and measures identified through monitoring against targets, including mode share, beyond the Green Controlled Growth (GCG) surface access Limits.
- 3.4.2 The indicative principles when scoping interventions to be funded by the STF, as overseen by the ATF Steering Group, include the following:
- a. Funded projects must be evidenced and directed related to the Proposed Development.
 - b. A balance between mode spending across the six surface access priority areas – (1) Luton DART and Rail, (2) Vehicle access, parking, private hire vehicles and taxis, (3) Bus and coach, (4) Walking and cycling, (5) Highway interventions (excluding those covered by the **OTRIMMA [REP4-085]** through the Residual Impacts Fund or other proposed off-site highway works), (6) Technology and communications – no more than 80% on any single priority area).
 - c. Funded projects must represent additional interventions beyond the operator's business as usual practices; the funding of capital works that form part of the Proposed Development (e.g. the extension of the Luton DART to T2); and any mandatory requirements of future planning applications (e.g. compliance with minimum cycle parking standards).
 - d. Funded projects to support sustainable travel should help achieve the Targets of the Travel Plan (and hence enable mode share levels to go beyond the GCG surface access mode share Limits). However, where a Level 2 Threshold or Limit has been breached and additional measures are required as part of a Mitigation Plan or Level 2 Plan, these should not be funded by the STF. The **OTRIMMA [REP4-085]** was submitted at Deadline 4 of the examination.
 - e. Should there be funds remaining at the end of the year, this should be rolled over and added into the next year's fund.

3.5 Governance

- 3.5.1 Whilst the airport operator would collect the funds through parking levies, there would be a Steering Group administering the STF, as a subset of the ATF.
- 3.5.2 This Steering Group would be chaired by the airport operator. The Steering Group would have selected representation from the ATF, as proposed in Table 3.4.

Table 3.4: Proposed ATF and Steering Group membership

ATF membership	Steering Group
The airport operator - who will chair the forum	National Highways
Local highway authorities and National Highways	Representatives from Central Bedfordshire Council, Hertfordshire County Council, Luton Borough Council, Buckinghamshire Council (Highways Authorities)
The relevant Local Enterprise Partnership	LLAOL (chair and Travel Plan Coordinator)
Local transport providers (bus, rail, coach, car hire, etc.)	
Relevant local authorities	
Passenger representatives	
Freight industry representatives	
Local businesses	
Representative from the Airport Consultative Committee	
Representatives of airport users	
Representatives of car park and taxi operators	
Representatives of airport employees	
Bodies representing interests of walkers, cyclists and disabled people in the area	

3.5.3 The **Applicant's response to Issue Specific Hearing 4 Action 17: Terms of reference for the Airport Transport Forum (ATF) [REP4-083]** document, submitted at Deadline 4, contains the purpose, structure, governance and responsibilities for the ATF.

3.5.4 The outline Terms of Reference for the ATF Steering Group would incorporate the ATF and would include the following:

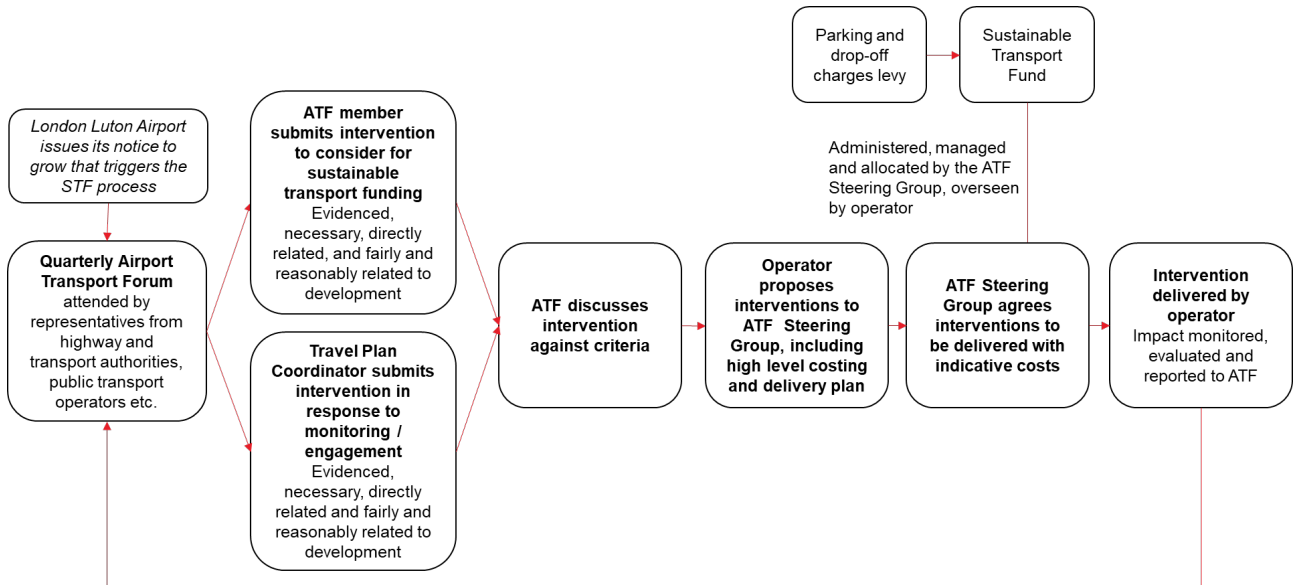
- a. Member organisations.
- b. Process for ensuring overall budget control of the ATF.
- c. Process for prioritising and agreeing funding allocations (including voting arrangements, where necessary) in the light of investment appraisals.

- d. Process for monitoring the effectiveness of measures taken (led by the airport operator's Travel Plan Coordinator).
- e. Process for reviewing the levy, with respect to annual inflation.

3.5.5 Further details will be provided in the Steering Group Terms of Reference.

3.5.6 An outline workflow of the STF decision making process is set out below.

Figure 3.4 STF decision making process



GLOSSARY AND ABBREVIATIONS

Term	Definition
ATF	Airport Transport Forum
ATF Steering Group	A select group of members of the ATF to play a greater role in decision making regarding surface access to the airport
CAA	Civil Aviation Authority
DCO	Development Consent Order
FTP	Framework Travel Plan
GCG	Green Controlled Growth
LLAOL	London Luton Airport Operations Ltd, the airport operator
Luton DART	Direct Air-Rail Transit, a rail service linking Luton Airport Parkway Station with London Luton Airport
mppa	million passengers per annum
OTRIMMA	Outline Transport Related Impacts Monitoring and Mitigation Approach
Proposed Development	The expansion of London Luton Airport to 32 mppa
RIF	Residual Impact Fund, used to fund mitigations for unforeseen impacts on the highway network
s106 agreement	Proposed legal agreement between the Applicant, airport operator and the host local authorities to secure the STF
STF	Sustainable Transport Fund, which outlines how funding will be provided for sustainable transport improvements
the Applicant	Luton Rising, a business and social enterprise owned by a sole shareholder, Luton Borough Council, for community benefit
Travel Plan	Five-yearly plans to be produced in accordance with the Framework Travel Plan that set mode share Targets and identify key transport interventions to be implemented
TRIMMA	Transport Related Impacts Monitoring and Mitigation Approach

APPENDIX A: FORECAST ANNUAL REVENUES

Table A.1: Forecast transactions and levy revenue – interpolating all years between assessment phases

Year	Annual Sustainable Transport Levy			Accumulated Sustainable Transport Levy		
	Core Planning Case	Faster Growth	Slower Growth	Core Planning Case	Faster Growth	Slower Growth
2025	£590,000	£597,000	£560,000	£589,000	£597,000	£560,000
2026	£609,000	£631,000	£582,000	£1,199,000	£1,228,000	£1,141,000
2027	£631,000	£724,000	£596,000	£1,830,000	£1,952,000	£1,737,000
2028	£631,000	£724,000	£607,000	£2,462,000	£2,677,000	£2,344,000
2029	£631,000	£724,000	£621,000	£3,093,000	£3,401,000	£2,966,000
2030	£631,000	£724,000	£631,000	£3,724,000	£4,125,000	£3,597,000
2031	£631,000	£724,000	£631,000	£4,356,000	£4,849,000	£4,228,000
2032	£631,000	£724,000	£631,000	£4,987,000	£5,573,000	£4,860,000
2033	£631,000	£724,000	£631,000	£5,618,000	£6,297,000	£5,491,000
2034	£631,000	£724,000	£631,000	£6,250,000	£7,021,000	£6,122,000
2035	£631,000	£749,000	£631,000	£6,881,000	£7,770,000	£6,754,000
2036	£631,000	£774,000	£631,000	£7,512,000	£8,544,000	£7,385,000
2037	£768,000	£829,000	£653,000	£8,280,000	£9,373,000	£8,038,000
2038	£845,000	£928,000	£675,000	£9,125,000	£10,302,000	£8,713,000
2039	£928,000	£1,009,000	£696,000	£10,054,000	£11,311,000	£9,409,000
2040	£1,007,000	£1,100,000	£718,000	£11,060,000	£12,410,000	£10,126,000
2041	£1,080,000	£1,196,000	£750,000	£12,140,000	£13,606,000	£10,877,000
2042	£1,164,000	£1,216,000	£777,000	£13,304,000	£14,822,000	£11,654,000
2043	£1,216,000	£0	£810,000	£14,520,000	£14,822,000	£12,463,000
2044	£0	£0	£837,000	£14,520,000	£14,822,000	£13,300,000
2045	£0	£0	£869,000	£14,520,000	£14,822,000	£14,169,000
2046	£0	£0	£928,000	£14,520,000	£14,822,000	£15,097,000
2047	£0	£0	£1,032,000	£14,520,000	£14,822,000	£16,129,000
2048	£0	£0	£1,124,000	£14,520,000	£14,822,000	£17,253,000
2049	£0	£0	£1,216,000	£14,520,000	£14,822,000	£18,469,000