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# London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.123 Applicant's Response to the Deadline 3 Comments  
from Holiday Extras Limited (REP3-118)**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.123

**The Planning Act 2008**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

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

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**8.123 APPLICANT'S RESPONSE TO DEADLINE 3 COMMENTS  
FROM HOLIDAY EXTRAS LIMITED [REP3-118]**

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## Holiday Extras Limited [REP3-118 ]

Table 1.1 Applicant's response to submission by Holiday Extras Limited at Deadline 3

I.D	Topic	Deadline 4 submission (Verbatim)	Luton Rising's Response
1	Surface Access	<p>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."</p> <p>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.</p> <p>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".</p>	<p>The Applicant seeks to correct a misstatement from the hearings in that although Holiday Extras Ltd was part of the Airport Transport Forum up until a couple of years ago, they are now no longer a member. The airport operator (LLAOL) runs the Airport Transport Forum (ATF). The airport operator is open to receiving a written application from Holiday Extras to rejoin the ATF, which they would consider in due course. Please refer to the <b>Applicant's Response to Issue Specific Hearing 4 Action 17: Terms of reference for the Airport Transport Forum (ATF) [REP4-083]</b>, submitted at Deadline 4.</p>
2	Surface Access	<p>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).</p> <p>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</p>	<p>The Applicant considers that the issue raised regarding the methodology used to determine the proposed levels of on-airport car parking was covered in the <b>Applicant's Summary of Oral Submissions and Responses to Comments Made at Open Floor Hearing 1, Open Floor Hearing 2 and Post-Hearing Submissions [REP2-030]</b>.</p> <p>The Applicant is not pursuing off-site third party parking options as part of the DCO but anticipates that third party off-site parking providers may use the opportunity created by airport growth to provide greater capacity of their own operation, subject to separate planning applications.</p>

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		<p>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.</p> <p>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.</p>	
3		<p>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.</p> <p>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).</p>	See above response to ID2.
4		<p>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.</p>	This action has been addressed in the <b>Applicant's Response to Issue Specific Hearing 4 Action 17: Terms of reference for the Airport Transport Forum (ATF) [REP4-083]</b> , submitted at Deadline 4.
5		Fly parking results in the same disbenefits associated with technological platforms, but with the added adverse impact of indiscriminate parking on	It is recognised that there may be residual impacts relating to parking on residential streets as a result of the Proposed Development. The Applicant is committed to supporting relevant highway

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		<p>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.</p>	<p>authorities to address this issue, as set out in the <b>Outline Transport Monitoring and Mitigation Approach (OTRIMMA) [REP4-085]</b> and in the <b>Applicant's Post Hearing Submission – Issue Specific Hearing 4 [REP3-051]</b>, pages 19-20. It is incorrect to suggest that measures to stop indiscriminate parking would likely encourage less sustainable modes such as 'kiss-and-fly'. The Applicant is seeking to encourage sustainable travel to the Airport through the GCG Limits and Thresholds for surface access and Travel Plan incentives and measures supported by monies provided through the Sustainable Transport Fund.</p>
6		<p>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.</p> <p>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.</p>	<p>It has been acknowledged that the proposed airport expansion will result in an increase in car borne trips to/from the airport as a result of the increase in passengers as set out in Chapter 9 of the <b>Transport Assessment [APP-205]</b>. However, there would be a decrease in the proportion of passengers using private car to access the airport in the future years.</p> <p>The Applicant disagrees with the assertion that encouraging the efficient use of taxis and private hire vehicles, coupled with the absence of any controls on this mode of access to the airport, is likely to lead to unintended consequences in terms of modal share.</p> <p>The purpose of making more efficient use of taxis is not to make taxi use more attractive but is to avoid journeys being made without passengers. At each phase of development, sufficient infrastructure will be provided to cater for the forecast demand by each surface access mode to and from the airport.</p>
7		<p>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.</p>	<p>On-site car parking is available as an access option in the early hours of the morning and late at night when there are less public transport services running. The application assumes that off-site car parking would form part of the future year mode share with the airport expansion and does not preclude Holiday Extras Limited or any other off-site car park operator from providing off-site airport car parks that could also be an access option when there are less public transport services.</p> <p>The Applicant is not pursuing off-site third party parking options as part of the DCO, but anticipates that third party off-site parking providers will seize the opportunity created by airport growth to provide greater capacity of their own operation, subject to separate planning applications.</p> <p>The <b>Green Controlled Growth Framework Surface Access Monitoring Plan (Appendix F) [APP-204]</b> contains information on how surface access will be monitored, including what constitutes a sustainable mode and a non-sustainable mode. The use of off-site car parks is not</p>

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			considered as a sustainable trip because the main part of the journey is made by car. As a result, this does not assist the airport to meet the sustainable transport targets.
8		<p>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.</p> <p>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.</p> <p>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.</p>	<p>The Applicant notes the representations regarding travel between Slip End and the Airport. The Applicant has been developing more detail around bus and coach routes to demonstrate the range of potential opportunities for improving bus and coach access to and from the airport, mapping gaps in current service provision and frequencies. These improvements are being developed in tandem with a Sustainable Transport Fund that will set the framework around how these types of improvements, alongside the others listed out within the toolbox of measures within the Framework Travel Plan [AS-131], would be funded. More information on the bus and coach study and the STF will be submitted at Deadline 5.</p> <p>The airport operator runs the Airport Transport Forum (ATF). The airport operator is open to receiving a written application from Holiday Extras to join the ATF, which they will consider in due course. Please refer to the <b>Applicant's Response to Issue Specific Hearing 4 Action 17: Terms of reference for the Airport Transport Forum (ATF) [REP4-083]</b>, submitted at Deadline 4.</p>
9		<p>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</p>	<p>The Applicant recognises that off-site parking would continue to provide an option for accessing the airport in the future, with the expanded airport, as shown in Table 9.5 of the <b>Transport Assessment [APP-205]</b>.</p> <p>The Applicant is not pursuing off-site third-party parking options as part of the DCO. However, this approach does not preclude Holiday Extras Limited or any other off-site car park operator from providing new off-site car parking facilities. The Applicant anticipates that third party off-site parking providers may use the opportunity created by airport growth to provide greater capacity of their own operation. Any such proposals would be subject to their own planning applications, and would be required to demonstrate the associated traffic impacts were acceptable to the relevant local planning authority.</p>
10		<p>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</p>	<p>See above response to ID 9.</p>

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		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 offairport car parking equivalent to 84% of the total long stay on-airport passenger car parking spaces expected in 2043 (6,550 spaces).	
11		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.	<p>The Applicant disagrees that public transport provision at Stansted Airport and Luton Airport cannot be viewed independently from airport related car parking.</p> <p>Whilst Stansted Airport was used as the main comparator in the benchmarking for public transport, there are differences in the make-up of the non-sustainable transport mode share for passengers, which is likely to be linked to the locations. London Luton Airport is located on the south-eastern edge of Luton whereas Stansted Airport is in a less populated area with the nearest town being Bishop's Stortford.</p> <p>With a much larger population located within a short distance of London Luton Airport, there is likely to be a higher propensity for drop-off and pick-up trips either by taxi or by private vehicle, as opposed to parking the car at the airport, as this will often be the most cost effective and convenient option for short trips.</p> <p>The CAA passenger survey data (Ref 1) for 2017 to 2019 shows London Luton Airport had a noticeably higher taxi/minicab/uber mode share than Stansted (average 6.5% higher), and although the published CAA data does not disaggregate the car mode share, it would be reasonable to assume that there would also be a higher proportion of private drop-off/pick-up trips at London Luton Airport. The consequence of this, is that less passenger car parking spaces would be required at London Luton Airport if the non-sustainable transport mode share and the number of passengers per annum was assumed to be equal at the two airports.</p>
12		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	See above response to ID11.
13		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	The difference between the car park types is essentially defined by the pricing tariff and the intention would be that the total spaces could be used flexibly. The role and impact of pricing as a demand management tool is something the airport operator currently considers as part of their surface access strategy and will continue to use to achieve surface access and mode share



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		attached to mid and long term parking at both airports. [para 4.3.4 of the Document APP-202]	<p>targets. The quoted 1 space per 3,137 passengers for mid and long stay parking only is misleading given the total spaces can be used flexibly.</p> <p>As stated previously, the on-site car parking reflects the accessibility of the airport and the much larger population located within a short distance of London Luton Airport compared to London Stansted Airport. This leads to a higher propensity for drop-off and pick-up trips either by taxi or by private vehicle to/from London Luton Airport, as opposed to parking the car at the airport. There is not therefore a direct relationship between the passenger duration of travel at the two airports and the amount of car parking required.</p>
14		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.	10,550 on-site car parking spaces was the level of car parking required at the point when the airport reached its permitted capacity of 18 mppa. There was subsequently a loss of some spaces from the mid term car park as a result of the construction of the DART.
15		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.	Future passenger car parking requirements have been determined from the baseline of 10,550 parking spaces which was the level of car parking required at the point when 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 as set out in Chapter 8 of the <b>Transport Assessment [AS-123]</b> .
16		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.	<p>As explained previously, the on-site car parking at Luton Airport cannot be compared with that at Stansted Airport.</p> <p>In 2019, the Airport had one car parking space per 1,706 passengers. This reflects the current operation of the Airport and accessibility options. On the basis of the modelling assumptions in Tables 9.4 and 9.5 of the <b>Transport Assessment [APP-205]</b>, by 2043, there would be one space per 2,000 passengers. This includes all the passenger on-site car parking i.e. short, medium and long stay parking.</p> <p>The difference between the car park types is essentially defined by the pricing tariff and the intention would be that the total spaces could be used flexibly. The role and impact of pricing as a demand management tool is something the airport operator currently considers as part of their surface access strategy, and will continue to use to achieve surface assess and mode share targets.</p> <p>The quoted 1 space per 4,179 passengers for mid and long stay parking only is misleading given the total spaces can be used flexibly.</p>
17		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	<p>Please see <b>Applicant's Response to Issue Specific Hearing 4, Action 26 - Sustainable Transport Fund [TR020001/APP/8.119]</b> submitted at Deadline 5.</p> <p>The airport operator is able to adjust parking tariffs as part of the mechanisms to control non-sustainable travel to the airport. This would be one of a suite of measures that would be available to the airport operator to meet GCG targets.</p>

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		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.	
18		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.	See above response to ID 17.
19		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.	The Applicant considers that the issues raised in the Document REP1-073 prepared by Holiday Extras Ltd at Deadline 1 was covered on pages 163/164 of the <b>Applicant's Response to Written Representations made by Members of the Public at Deadline 1 (Part 1b) [REP2-034]</b> .
20		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.	See above response to ID 19.
21		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.	The Applicant considers that the issue raised regarding the setting of the values of the GCG surface access Limits and Thresholds, including their alignment with the assumptions around the achievable level of increase in public transport usage was covered previously in the responses provided on Page 124 of in the <b>Applicant's Response to Written Representations made by Members of the Public at Deadline 1 (Part 1b) [REP2-034]</b> and Page 19-20 of the <b>Applicant's Response to Relevant Representations - Part 2B of 4 (Members of the Public) [REP1-022]</b> .
22		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.	The Applicant is not clear what unintended consequences are being referred to in this comment and are confident that the appropriate measures have been set out to mitigate the impacts of the Proposed Development. Details of the Sustainable Transport Fund are set out in the <b>Applicant's Response to Issue Specific Hearing 4, Action 26 - Sustainable Transport Fund [TR020001/APP/8.119]</b> submitted at Deadline 5.

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23		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.	The airport operator (LLAOL) runs the Airport Transport Forum (ATF). The airport operator is open to receiving a written application from Holiday Extras to join the ATF, which they will consider in due course. Please refer to the <b>Applicant's Response to Issue Specific Hearing 4 Action 17: Terms of reference for the Airport Transport Forum (ATF) [REP4-083]</b> , submitted at Deadline 4.

## REFERENCES

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Ref 1 <https://www.caa.co.uk/data-and-analysis/uk-aviation-market/airports/uk-airport-data/>