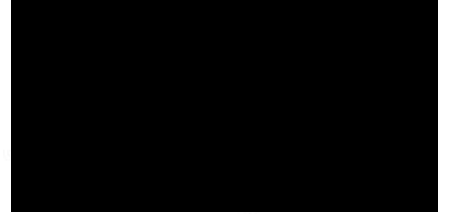


Tim North  
& Associates  
Limited

Chartered Town Planning  
& Development Consultants



**Post Hearing Submissions and Comments on Behalf of Holiday Extras Ltd  
in Response to Any further Information/Submissions  
Received by Deadline 5**

**PINS Ref No. TR020001**

**Deadline 6**

**Registration Identification No. 20039891**

## **1.00 DOCUMENT REP5-056, THE NEEDS CASE AND ITS RELATIONSHIP TO FUTURE PASSENGER CAR PARKING PROVISION**

- 1.01 **Document REP5-056** is concerned with the Applicant's Response to Issue Specific Hearing 4 Action 26 – Sustainable Transport Fund (hereinafter referred to as STF), setting out the purpose of the STF and why it is needed as part of the DCO application for London Luton Airport. It sets out the funding sources, being based on individual car parks, the drop-off zone and priority parking - pre-booked, although the answer to whether the latter category in the STF is both “yes” and “no”.
- 1.02 The contents of paragraph 3.3 of the **Document REP5-056** confirm that it has been based on a full year's data of parking and drop-off transactions up to May 2023, received from the Airport Operator to determine a baseline vehicle demand, with passenger forecasts taken from the **Needs Case [Document 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 [Document APP-203]** corresponding to each assessment phase.
- 1.03 Consideration has been given to inflation forecasts from the Office for Budget Responsibility, with the latest rate set at £0.25 per passenger parking transaction and £0.10 per passenger drop-off. Reference has been made to no levy being applied to two car parking products, namely the Mid-Stay Car Park – Gate (under 15 mins) and Long Stay Car Park – Gate (under 1 hour), although this is not properly reflected in Table 3.1 of **Document REP5-056**. Indeed, my clients would query whether the last entry in Table 3.1 which reads “*Priority Parking – Pre-Book*” should refer to Long Stay Car Park – Gate (under 1 hour), if only to accord with the contents of paragraphs 3.2.2 and 3.3.1.
- 1.04 The Examining Authority has been informed that the passenger forecasts set out the **Needs Case [Document AS-125]** reflects a range of factors including the airport's catchment, passenger characteristics, destinations served, as well as those of competing airports (see responses on pages 20, 25 and 26 of **Document REP1-022**); whilst proposed on-airport passenger car parking numbers are defined using a combination of CAA data, existing parking numbers, projected busy day timetables and mode share aspirations, a matter highlighted on pages 30 and 31 of **Document REP1-022**.

- 1.05 The Sustainable Transport Fund is based on passenger forecasts arising from the **Needs Case [Document AS-125]**. The figures relating to proposed short, mid and long term on-airport passenger car parking over the three phases of the DCO application, outlined in Table ES.1 of **Document APP-203**, cannot in my client's opinion, be considered independently from those factors contributing to the **Needs Case [Document AS-125]**.
- 1.06 The Applicant states that the proposed passenger on-airport car parking figures comprising part of the DCO application have been derived from Sections 8 and 9 of the Transport Statement [**Documents APP-203 to APP-206**], although as I have indicated in previous responses on behalf of Holiday Extras Ltd, there is a distinct absence of any detailed methodology as to how the figures of future mid and long term on-airport passenger car parking provision throughout the duration of the DCO to 2043 have been derived. [See **Document REP5-070; Document REP3-118, and EV9-003**].
- 1.07 The **Needs Assessment AS-125** in terms of passenger forecast growth for the airport has considered a number of different scenarios based around faster and slower growth in underlying demand, and alternative scenarios for runway capacity delivery in the London Airport system. Initially the forecast was presented on an unconstrained basis until 32mppa is reached, reflecting the potential passenger demand that the airport can attract, if it had the infrastructure capacity to do so under different scenarios of runway capacity delivery elsewhere, and also for faster and slower growth in demand. Six resulting passenger demand growth scenarios were initially considered, which in terms of the unconstrained demand forecast resulted in three scenarios being selected in terms of underlying growth in demand.
- 1.08 The three scenarios were as follows:
- A. A central demand growth scenario based on the "*most likely*" growth, combined with an allowance made for one new runway at either Heathrow or Gatwick. This was considered to represent the most robust basis for considering the need for additional capacity at the airport, as there is no certainty that both runways could be viably be brought forward in the same time scale.
  - B. A slower demand growth scenario in which 32mppa is reached later in 2029. This was based on a reasonable "*lower bound*" market growth with no additional

runways, and “*most likely*” demand growth with two additional runways in the south east of England, both of which would be substantially delayed or potentially not delivered at all.

C. A faster demand growth scenario based on the reasonable “*upper bound*” market growth with two additional runways or “*most likely*” growth with no additional runways delivered. The attainment of 32mppa would be met at an earlier date, with potential implications for the fleet mix.

1.09 The constrained passenger forecast for assessment purposes considered the extent to which the unconstrained growth demand scenario projections could be delivered assuming the indicative delivery of the proposed development. In practice the delivery of new airport capacity means growth at the airport is likely to be subject to periods when it will be constrained below that which could be attained, if it was to meet unconstrained demand growth. Ultimately this has an effect on when the 32mppa will be reached.

1.10 To these considerations governing passenger forecast growth, attention is also required to be focussed on the characteristics of passengers, segregated according to whether they are form part of a business or leisure trip, and whether they are UK or foreign based. Passenger air transport movement forecasts are calculated for future years based on a projected average number of passengers per movement. By dividing the overall passenger forecast by these projections determines the annual movements.

1.11 The **Needs Assessment Document AS-125** indicates that there has been a rapid increase in passengers per passenger air transport movement through London Luton Airport due to the average number of seats in each flight increasing, and airlines selling a higher proportion of seats available on each flight, the latter known as the load factor. These factors have been influenced by the replacement of larger versions of the same aircraft – the Needs Assessment highlights EasyJet replacing the 156-seat Airbus A3109 with the 186-seat Airbus A320 aircraft. Furthermore, there has been a more rapid growth at the airport by airlines such as Wizz Air which have been operating larger capacity variants of narrower bodied aircraft, compared to the historic average. This has resulted in an upward trend and acceleration of the average number of seats per flight, which in the case of Wizz Air has increased from 180 seats per flight in 2015 to 200 seats per flight in 2019.

- 1.12 It is anticipated that the rate of change in average passengers per aircraft movements will be slower over the medium to long term due to a number of factors, including the fact that Wizz Air now accounts for a larger proportion of the overall traffic, and therefore its future growth will have a lower impact in terms of an on-going increase in passengers per aircraft movements than was the case up to 2019, when it was growing its share and increasing aircraft size concurrently.
- 1.13 Busy Day Timetables (BDTTs) have been developed as a basis for assessing capacity requirements and these are used to project forward to 92-day and annual fleet mixes. They represent a typical busy day and not the peak in the year or the busiest hour in the year, but a typical busy period relevant for design purposes. This is normally based on a day containing the 30<sup>th</sup> busiest hour in the year. As the airport has a fairly consistent pattern of daily operations over the busy summer period, it is considered a representative day.
- 1.14 In addition, timetables for an indicative October day have been developed in each assessment year for the purposes of surface access assessments and transport modelling. This is to reflect that the busy day in each year is likely to occur in the peak of summer, when background road traffic is lower due to school holidays. The October day represents a typical busier day for the month (excluding the half term peak) to test against normal level of background traffic demand and is considered by the Applicant to be more appropriate for surface access modelling.
- 1.15 I have set out overleaf profiles of scheduled arriving and departing passengers on a busy day, taken from Figures 6.20 and 6.21 of the **Needs Case [Document AS-125]** which have been prepared by York Aviation on behalf of the Applicant. It can be seen that there is increasing peakiness from a base year of 2019, taking into account the three phases involved in the current DCO application. This increasing peakiness occurs at 0700hrs, 1200hrs, 1800hrs and 2200hrs for arriving passengers, with similar increased peakiness for departing passengers at 0600hrs, 1200hrs, and a more consistent pattern thereafter to 2100hrs.
- 1.16 An assessment of these two profiles means that passengers' early morning departures would have to factor into their modal choice not only price, but also the "lead time", calculated as the time spent from the point of entry to the terminal; passing through

check-in and security; before entering the departure hall, and proceeding to the flight departure gate. For arriving passengers, they would need to take into consideration the “lag time” being the time spent from the time of landing; passing through passport control; collecting any luggage from the baggage reclaim, before proceeding through customs and exiting the terminal. These time periods are likely to be prolonged during periods when large numbers of passengers are passing through the airport, particularly at 0600hrs and 0700hrs, which in turn have a direct impact on the choice of mode to London Luton Airport.

Figure 6.20 Profile of Scheduled Arriving Aircraft Movements on a Busy Day

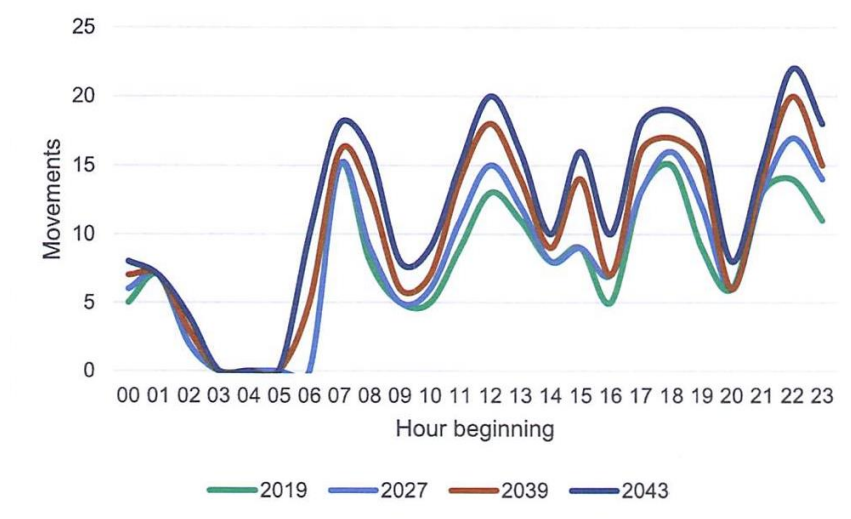
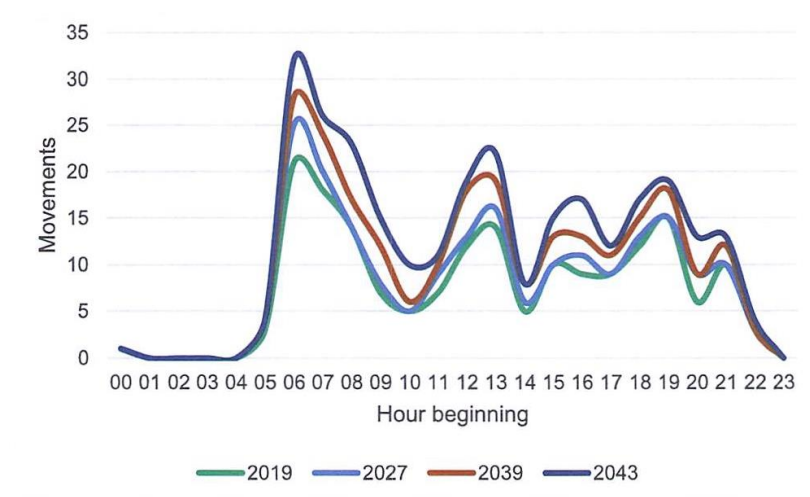


Figure 6.21 Profile of Scheduled Departing Aircraft Movements on a Busy Day



Source: York Aviation

1.17 The above factors derived from the **Needs Case [Document AS-125]** comprise an important integral part of those considerations which underlie the extent of the STF. The same factors influence passenger car parking demand, which in turn has an impact on passenger car parking supply. A contingency figure should be introduced with respect to future short, mid and long term on-airport passenger car parking provision, to take into account uncertainty surrounding those diverse factors contributing to the **Needs Case**, the prospect of a faster growth scenario arising over the time period covered by the DCO application, as well as unforeseen events.

1.18 The recent fire at Terminal 2 and the unknown impact arising from a growth in autonomous vehicles in modal share/car parking provision at the airport are just two examples of unforeseen events that can arise. It means that any assessment of on-airport passenger car parking supply should incorporate a contingency figure which extends beyond simply making an allowance for those passengers who have not pre-booked a car parking space. This is considered necessary irrespective of the need to accord with the limits/thresholds set out in the Green Controlled Growth where they concern surface access and the interventions/measures available through the Framework Travel Plan.

## **2.00 THE ROLE PERFORMED BY OFF-AIRPORT CAR PARKING PROVIDERS AS PART OF THE DCO APPLICATION**

2.01 The **Needs Assessment Document AS-125** states at paragraph 6.4.20 on page 119 that in terms of its catchment area:-

*“The Airport is expected to expand the area it draws passengers from over time, particularly to the South, reflecting the greater attractiveness in terms of its range of services. The expansion to the south reflects likely on-going constraint with the London Airport system, even in the future. Figure 6.6 shows a map of passenger demand growth rates by district for the core planning case with a third runway at Heathrow. The darker colour represents faster growing sources of demand, albeit the effects are only marginal in scale, this shows quite clearly that faster growth markets tend to be to the south of airport, and to some extent the high market share already captured by the airport more locally. This will, ultimately, have some implications on surface access to the airport moving forward, which have been taken into account in the Transport Assessment.”*

2.02 The expected expansion of London Luton Airport’s catchment to the south cannot be considered in isolation from the conclusion reached by the Applicant at Issue Specific Hearing 4, confirmed in **Document EV9-006**, that *“Holiday Extras are clearly a really important partner at the Airport”*, a comment which has gathered increasing significance



through subsequent stages in the DCO process. The Applicant's response to the Examining Authority's written questions set out at **Document REP4-069** is particularly relevant in this respect, especially to Question TT 1.13, viz:

*"In addition to the on-site car parking, the Transport Assessment assumes that off-site car parking would provide part of the future parking supply for the expanded airport. The existing third party operated off-site car parking for London Luton Airport are shown in Figure 5.13 in Chapter 5 of the Transport Assessment – Document AS-123] In 2019 these off-site third party car parks provided at least 6,800 spaces. 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 provided by airport growth to provide proportionately greater capacity of their own operation, subject to separate planning applications. The Applicant will engage with any off-site operator if a positive initial response was received from the relevant Local Planning Authority with regard to additional or extended off-site parking facilities. "* (my emphasis)

- 2.03 My client, as a long term off-airport car parking operator, welcomes the support given by the Applicant in which they are incentivised to provide greater capacity as part of their own lawful operations. My client's position in this respect is clear. Holiday Extras Ltd remain open to discuss with London Luton Airport the subject of increasing long term off-airport passenger car parking provision, a situation which has remained unchanged since earlier talks took place with the Applicant between November 2019 and February 2020. Furthermore, Holiday Extras Ltd consider it prudent that any discussions involve surrounding Local Planning Authorities in exploring this important aspect of future passenger car parking provision, if only to ensure appropriate controls are available and put in place.
- 2.04 The ability to ensure effective off-airport passenger related car parking provision is available and in place comprise an important pillar in cementing the success of the current DCO application. This is a consideration which Holiday Extras Limited believe should not be underestimated. It enjoys the added benefit of (i) assisting in the reduction of indiscriminate passenger car parking on neighbouring residential streets, and (ii) reducing the least sustainable modes of access to London Luton Airport, namely kiss-and fly and drop-off. Above all, it is required to be seen in the context of paragraph 7.31 of the Statement of Case prepared by Luton Borough Council into the called in inquiry into the expansion of London Luton Airport from 18 to 19mppa, viz: *"The provision of available car parking at the airport is below that which was envisaged within the 2012*



*application and the rapid growth of the airport has resulted in a greater under provision of available spaces.”* (my emphasis)

- 2.05 A decision taken not to engage with long term off-airport passenger providers has the propensity to result in uncertainty surrounding the ability to comply with future mode share targets set out in the Green Controlled Growth Framework, resulting in the growth at London Luton Airport either slowing or indeed coming to an abrupt halt, pending the introduction of measures outlined in a Level 2 Mitigation Plan to manage the situation. This position was accepted by Leading Counsel acting on behalf of the Applicant at Issue Specific Hearing 7 held on Tuesday 28<sup>th</sup> November 2023. **[Document ENV14-004]**
- 2.06 An open proactive approach is therefore preferable involving all parties, in a search for acceptable alternative site(s) suitable for long term off-airport car parking purposes – in effect preventing uncertainty surrounding the future growth potential of the airport. As indicated at Issue Specific Hearing 7 held on Tuesday 28<sup>th</sup> November 2023 it is appreciated that obtaining planning permission for long term off-airport car parking is particularly difficult to achieve in Green Belt locations. It necessitates for sustainability reasons that priority is focused on locations situated in Luton Borough Council’s administrative area, with a package of measures required in Metropolitan Green Belt locations, sufficient to demonstrate “*very special circumstances*”. In this regard, “*very special circumstances*” will not exist unless the potential harm caused to the Green Belt by reason of inappropriateness, and any other harm resulting from the development, is clearly outweighed by other considerations. A detailed balancing exercise is therefore required to be undertaken.
- 2.07 It is worthwhile examining the Panel of Inspectors’ recent appeal decision relating to an expansion of Bristol Airport to enable a throughput of 12 million terminal passengers in any 12 month calendar period, if only because it demonstrates that individual proposals on land in a Green Belt are by their nature fact sensitive, being dependent on the nature of the “*very special circumstances*” advanced by the applicants. Equally it does not mean that where a site is situated on land in a Green Belt, it obviates the decision-taker as part of any planning judgement from giving whatever weight is considered appropriate to the “*very special circumstances*” advanced in the overall planning balance exercise.

- 2.08 The area surrounding Bristol Airport comprises predominantly open undulating countryside, with the boundary of the Mendip Hills AONB situated some 3km south of the airport, with the site lying outside, but within the consultation zone of the North Somerset and Mendip Bats Special Area of Conservation, designated because of the importance of Greater and Lesser Horseshoe Bats. Most of the land around Bristol Airport is situated in the Bristol Green Belt save for some 44ha on its northern side which is known as the Green Belt Inset (GBI) which includes the passenger terminal, air traffic control tower, hotel, Multi Storey Car Park 1 and surface car park.
- 2.09 In the Bristol Airport case, the Inspectors concluded that there was moderate harm to the openness of the Green Belt and in particular the third purpose of Green Belt policy, being to assist in safeguarding the countryside from encroachment, but found that the benefits arising from the proposed development were such as to clearly outweigh the harm to the Green Belt, along with harm to noise, to amount to *“very special circumstances”*.
- 2.10 The *“very special circumstances”* identified by the Panel of Inspector’s in the Bristol Airport appeal decision concerned the need for the development along with the socio-economic benefits arising from the scheme, together with other considerations relating to (i) the need for additional car parking (ii) the lack of alternative sites outside the Bristol Green Belt which had been assessed and (iii) a demonstrable need to provide car parking which could not be fully accommodated outside the Green Belt.
- 2.11 The alternative to providing off airport car parking, which may arise at any time, is for London Luton Airport having to conflict issues of prolonged uncertainty regarding the need to comply with adopted mode share targets; intensified pressures and costs associated with fly parking in surrounding residential streets, together with increased reliance placed on the least sustainable modes of access to the airport. The degree of uncertainty and consequential doubts surrounding modal share targets over the duration of the DCO application is considered to be far more unacceptable, compared with the alternative of settling on a long term off-airport passenger car parking site(s), providing passengers with a choice, at the same time according with the Applicant’s case relating to the role expected of providers of future long term off-airport passenger car parking.
- 2.12 The approach taken by the Applicant in the provision of future off-airport passenger car parking has more recently been reiterated at the Deadline 5 stage, and to this end

paragraphs 3.4.1 and 3.4.2 of **Document REP5-041** outlining considerations surrounding the Mitigation Type 1 process forming part of the Outline Transport Related Impacts, Monitoring and Mitigation Approach (TRIMMA) are relevant:-

*“3.4.1 Airport sites do not include third party off-site car parking facilities because the traffic associated with these (aside from any vehicles travelling between these facilities and the airport terminal, such as shuttle buses) are outside the airport’s control. This traffic – and its forecast growth due to the Proposed Development – is, however, incorporated in the background traffic. It is therefore incorporated into designs associated with MT1.*

*3.4.2 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 proportionately greater capacity of their own operation, subject to separate planning applications. The applicant will engage with any off-site parking operator if a positive initial response is received from the relevant local planning authority, with regard to additional or extended off-site parking facilities.”*

- 2.13 The position adopted by the Applicant in terms of long term off-airport passenger car parking sites forming an integral part of its DCO application was further endorsed by Mr Matthew Rhodes at Issue Specific Hearing 7 in the afternoon of Tuesday 28<sup>th</sup> November 2023; a matter confirmed by the video recording comprising **Document ENV14-004**.

*“With regards to how off-site car parking was dealt with in the Transport Assessment it was assumed that there would be a growth in off-site car parking trips associated with the airport development, and this approach was basically using the same trip distribution for those off-site car parks as existed today, and in growing that in line with the growth in trips as a result of the airport phases. I think it was acknowledged by the Applicant that there would be a market for that off-site car parking and they would expect car parking operators to make planning applications to increase the amount of off-site car parking to meet that demand. If that demand didn’t not materialise, there would obviously be controls set out within the GCG that would effectively prevent the airport from growing unsustainably, and would require that any additional car drivers over and above that level to be taken up by sustainable modes, so I think it is an acknowledgement that airport off-site car parks do play an important role in managing parking supply, but that mode share is assumed to stay the same and that the market would take up the opportunity to deliver that additional parking as part of the airport expansion.” (my emphasis)*

- 2.14 Action Points 10, 15, 18, 19, 20 and 21 identified by the Examining Authority arising from Issue Specific Hearing 7 on traffic and transport matters, including surface access, held on Tuesday 28<sup>th</sup> November 2023, requires a response from the Applicant, Luton Borough Council and Central Bedfordshire Council at Deadlines 6 and 7. My clients, as the largest long term off-airport car parking provider serving London Luton Airport, have a clear

interest in the representations raised on these six specific Action Points, to which they will respond at the Deadline 7 stage of Tuesday 9<sup>th</sup> January 2024.

2.15 I have previously referred in paragraph 2.04 of these representations to the point made by Luton Borough Council in their Statement of Case relating to the called-in inquiry and the expansion of the airport from 18mppa to 19mppa, that the provision of available car parking on-airport was below that envisaged in the 2012 application Project Curium, and that due to rapid growth, there was a greater under-provision of available spaces.

2.16 The Inspector's Report dated 23<sup>rd</sup> May 2023 into the same development records the stance taken by Luton Borough Council in the provision of on-airport passenger car parking provision at paragraphs 9.37 and 9.38, namely:

*"9.37 The proposal does not provide any additional car parking spaces at the airport. There has been a change in the number of spaces since the granting of the 2014 permission, with the loss of so me to allow for the construction of DART and their replacement through the construction of a new multi-storey car park. The airport's official car parks collectively have a capacity for just under 10,000 spaces for use by passengers and 700 spaces for staff. The CPMP seeks to manage use of the spaces through pricing, thus ensuring an appropriate balance between supply and demand.*

*9.38 The increased costs and additional parking restrictions at the airport had resulted in migration of parking to neighbouring residential areas in recent years. The Council addressed this displacement through consultation with residents of the affected areas and the introduction of a permit scheme in Vauxhall Park. However, a similar proposal for the Wigmore area did not have public support so the intention is to monitor the situation and take further actions if this proves necessary in the future."*

2.17 The approach taken by neighbouring local authorities at the same called-in inquiry where it concerned surface access considerations is conveniently set out at paragraph 13.11 of the same Inspector's Report, which broadly accords with the same Councils' position in respect of the current DCO application:

*"13.11 Restricting the assessment to estimating the additional trips in peak periods in October did not adequately reflect the overall pattern of operations at the airport. The impacts on traffic flows and demand for parking occur throughout the year. The authorities were supportive of the promotion of modal shift with greater use of rail and bus to access the airport. However, there was concern about the aspirational nature of the targets within the TP which relate to the totality of the operation, not just peak periods. There was a specific request from Central Bedfordshire Council for funding to address parking problems which spill into the surrounding areas. The absence of effective mechanisms to monitor and rectify any failure to deliver the TP's targets would increase the impacts on the local road*

*network and do so beyond the boundaries of LBC. More robust means of ensuring compliance with the TP involving the surrounding authorities would be needed, rather than relying on the airport, overseen only by LBC."*

- 2.18 In concluding this section, it can be seen that the Applicant as part of the current DCO application does not seek to prevent long term off-airport car parking by independent providers in the future. On the contrary, the Applicant has confirmed there is a market for off-airport car parking with the assumption made that there will be a growth in off-airport car parking trips made to the London Luton Airport. In the event long term off-airport car parking operators do not seize this opportunity, serious consequences may materialise for the airport in terms of compliance with the thresholds and limits set out in the Green Controlled Growth, resulting in a slowing down or worse, a halt to the airports growth.
- 2.19 It follows that there is a dependency on off-airport car parking providers to come forward with planning applications to assist in meeting that segment of the market concerning those passengers who rely on the private car to access the airport. As an issue, it has implications not only for the future growth of London Luton Airport, but also in terms of the wider impact and costs associated with controlling fly parking in surrounding residential streets.
- 2.20 The Applicant is on record as stating that *"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 be a higher proportion of private drop-off/pick-up trips at London Luton Airport."* [see response on page 5 of **Document REP5-059**]. In the light of these comments should long term off-airport car parking providers be prevented from contributing to the airport's growth, the inevitable result is likely to be significant increases in the least sustainable modes of access to the airport.
- 2.21 It is worth recording the conclusions drawn in the Inspectors' Report of 23<sup>rd</sup> May 2023 and the resultant Secretary of State's decision letter of 13<sup>th</sup> October 2023, if only to highlight the importance placed on long term off-airport car parking providers in meeting the needs of those passengers reliant on the private car mode, a factor which has been acknowledged by the Applicant in his DCO application. Paragraph 15.135 states:

*“15.135 It is appreciated that in addition to the car parking provided by the Applicant, there are nearly 10,000 spaces operated by third parties. In all the total number of spaces available to those who choose to drive has increased since 2019 from 15,321 to 18,745. Of all passengers who drive to the airport, 37% typically park with off-site operators. Other data suggests that as parking charges have increased the number of passengers seeking to park at the airport has fallen from 28% in 2014 to 16% in 2019. On the other hand, during this period there has been a significant increase in ‘drop-offs’ which accounted for 45% of passengers in 2019 (including taxis).” (my emphasis)*

### **3.00 BUS AND COACH STUDY**

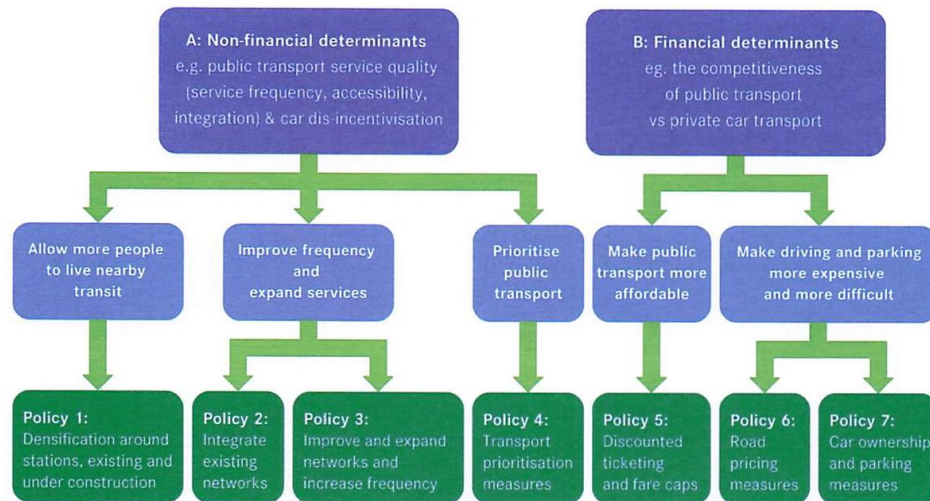
- 3.01 The Applicant has prepared a Bus and Coach Study [**Document REP5-058**] which has considered existing bus and coach services, with potential for new services, and a chapter devoted to the underlying rationale and prioritisation of new services. The study confirms, and it is not disputed by my client, that a significant portion of bus users travelling to the airport comprise staff, whilst all coach users travelling to the airport consist of passengers.
- 3.02 It follows that for interventions to be meaningful, any increase or improvement to bus services are required to focus attention on the working schedules of staff at the airport, with passenger movements by coach reflecting flight departure and arrival times, alongside consequential lead and lag times. In the case of coaches serving London Luton Airport, it is only during peak periods where a frequent and reliable level of service is available that airport passengers will be enticed to take advantage of the inexpensive cost of coach travel; and even then, there will be doubts amongst certain passengers on whether the price is too cheap to offer a good standard of service commensurate with a suitable level of comfort.
- 3.03 In assessing the prospects of improved or enhanced services being offered to passengers accessing London Luton Airport by coach, requires a comparison to be made between on the one hand, the frequency of coach services over a 24-hour period, and on the other, observed patronage with particular reliance placed on those profiles of scheduled arriving and departing aircraft movements on a busy day, set out earlier on page 6 of these representations. It is from this basis that a detailed judgement can then be made on whether the respective coach service is likely to be a long term commercial option. The same assessment will examine the extent to which any pump-priming or subsidy is necessary in order for the service to reach a viable position.



- 3.04 There is an absence of any timetables relating to existing bus and coach services to London Luton Airport in **Document REP5-058**, with no existing patronage information. No indication is provided as to how improvements to the existing bus or coach service will be reflected in the respective timetable, and when the intervention is anticipated to take place. Table 3.1 merely states that there would be increases in frequency, but no details are provided as to whether, in the case of coach passengers, this involves increased services during peak flight departure and arrival times at the airport.
- 3.05 The conclusions emanating from an assessment of potential new services reveal six routes where funding and delivery is expected to be prioritised. The six routes set out in paragraph 4.3.5 of **Document REP5-058** concentrate attention on five bus routes and what is in fact a single coach route, although this is referred to as bus route 737 serving Buckingham in the same paragraph. There is no existing or potential bus route 737; Appendix B to the same document confirming that it is coach route 737 operated by National Express.
- 3.06 Route 737 currently runs from Oxford to London Stansted Airport via Milton Keynes Coachway, Luton (Challney), Luton, London Luton Airport, Hatfield, Hartford and Harlow. It is proposed to extend the service to Cambridge and increase the frequency from 8 coaches per day to an hourly service. It is the only link from towns west of Aylesbury to London Luton Airport involving a long circuitous journey, compared to the more direct route by private car, and with this in mind it is unlikely to be attractive to airport passengers.
- 3.07 It is only where there is a direct, quick, reliable and comfortable service that the coach will be an attractive option for the airport passenger. I have set out overleaf those generic factors determining the competitiveness of public transport, which broadly coincide with both financial and non-financial categories. If public transport is not the more competitive choice in both categories, policies to encourage modal shift are unlikely to succeed. In this way, public transport must be the most affordable and most convenient choice. A successful approach to public transport should consider a combination of policies that will encourage modal shift. To create an effective strategy, the "A" actions set out on the left hand side of the model reproduced overleaf based on non-financial factors, should be adopted in combination with the "B" interventions on the right hand side of the same model.

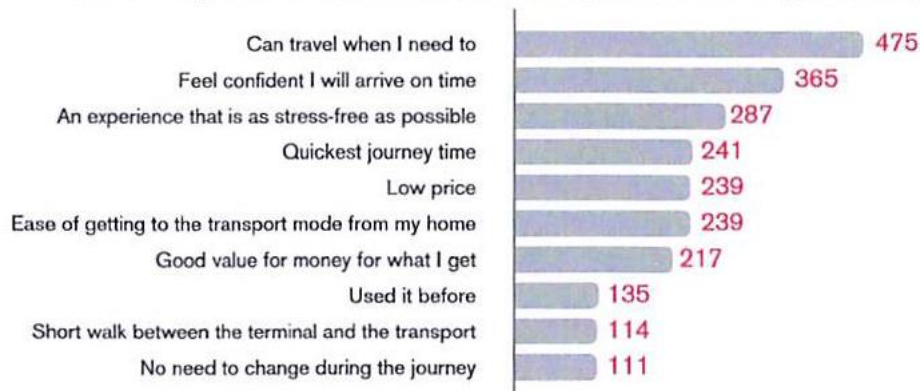


### Factors Affecting the Attractiveness of Public Transport



- 3.08 In the case of the financial determinants affecting the attractiveness of access by public transport to an airport, making driving and parking less accessible and more expensive is particularly difficult to achieve. This is because generally the numbers of trips made to an airport are less frequent than they would be for a normal work or leisure trip, with the primary aim being to arrive at the airport to catch a flight at a predetermined time, or leaving the airport to reach home/business at the earliest opportunity. These factors are afforded increased significance if the flight arrival time is late at night or early in the morning.
- 3.09 It means that there is a wide choice of access mode available for the passenger to consider, including taxi, minicab or Uber; taking advantage of technological platforms such as JustPark, or being dependent on kiss-and-fly or drop-off, as well as making a decision on whether to park on or off-airport. As a consequence, financial determinants are less available when considering surface access to an airport, disincentivising modal shift towards public transport use.
- 3.10 Transport Focus carried out a study alongside London Heathrow Airport and the Department for Transport relating to journeys and perceptions of travel to and from an airport, which identified ten most important considerations when travelling to the airport, which for ease of reference is set out overleaf.

### 10 most important considerations overall, when travelling to the airport



- 3.11 The Bus and Coach Study prepared by the Applicant reveals three existing bus services originating at London Luton Airport, five bus services from Luton Airport Parkway Railway Station, and thirteen bus services from Luton Town Centre. The priority in terms of intervention is to focus on a new bus service A100 with limited stops between London Luton Airport, Hitchin and Stevenage, based on the existing Arriva Bus 100, with new stops in key urban areas and at transport hubs. The expected journey time improvement would be reduced from currently 1 hour point to point, to 40-45 minutes. This would intensify bus provision in an arc lying to the east of the airport, improving access available to staff.
- 3.12 Two of the four remaining bus routes to be the subject of priority funding and delivery comprise Centrebus B serving the Downside area, and Centrebus E serving Toddington, both lying to the west of the airport, with the primary intervention being an extension of the termination point from Luton Bus Station to Luton Airport Bus Station, with increased frequency in the case of Centrebus E from an hourly to half-hourly service.
- 3.13 In a similar way, two other bus routes, being Arriva Bus F70 and Red Eagle X61, extend the termination point from Luton Station Interchange in Luton Town Centre to Luton Airport Bus Station, with the frequency of Service F70 to Leighton Buzzard increasing from an hourly to half-hourly during the peak times, and X61 terminating at Aylesbury being increased from one bus per day to one bus every three hours. It is contended the latter service is not conducive to regular use by staff or by passengers.
- 3.14 There are nine existing coach services serving London Luton Airport, three of which provide a direct link via different routes from London Luton Airport into Central

London, terminating at London Victoria Coach Station. There is a good peak frequency service on each route as would be expected on a relatively short journey to a capital city where an established public transport network exists, with good connectivity to all forms of services and community facilities, and where 46% of residents use public transport to commute to work, rising to 80% for those working in Central London.

- 3.15 Of the remaining six coach routes, only one terminates at London Luton Airport. The remaining five coach services all comprise long distance routes where London Luton Airport as a consequence of its geographical location on a predominantly north-south corridor following the M1 Motorway, is conveniently sited as a stop-off or pick up point. They all serve towns and cities lying well beyond the existing and proposed catchment area of London Luton Airport.

#### **4.00 RAIL IMPACT STUDY**

- 4.01 A key issue surrounding rail travel to London Luton Airport, whether it be from or to the passenger's home or business, which is not dissimilar from the same considerations relating to reliance on coach travel, is the passenger's access to the transport hub. If it is the case that a passenger has to rely on a taxi/minicab, or a friend/relative to drop them off or collect them from a transport hub, then that in itself is a disincentive to use public transport. In these circumstances, it is likely that the passenger would choose the most convenient, safe and price sensitive option, particularly if the journey takes place late at night or early in the morning, and if accompanied by children and/or relatives who may be mobility impaired, and where heavy luggage is involved.