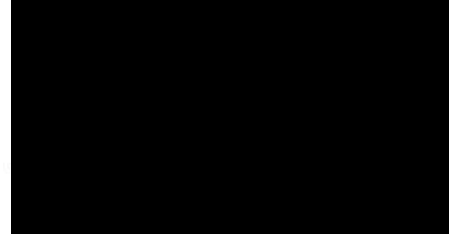


Tim North
& Associates
Limited

Chartered Town Planning
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**Comments on Behalf of Holiday Extras Ltd
in Response to Any Further Information/Submissions
Received by Deadline 6**

PINS Ref No. TR020001

Deadline 7

Registration Identification No. 20039891

1.00 PRELIMINARY CONSIDERATIONS

1.01 It has been noted that the Examining Authority issued Further Written Questions and requests for further information on 15 December 2023 directed at the Applicant, other Local Authorities and interested parties, in which a response is sought by Deadline 7. Although no specific questions or requests involved an input from my clients, Holiday Extras Ltd, they nevertheless wish to reserve their position in responding to what may be said to the following questions posed by the Examining Authority on the 15th December 2023 namely: BCG.2.2; CA.2.2; MAD.2.1; TT.2.19; TT.2.20 and TT.2.21; all of which are of particular interest given the nature of my client's business.

2.00 HOLIDAY EXTRAS LIMITED'S COMMENTS ON RESPONSES FROM LUTON BOROUGH COUNCIL & CENTRAL BEDFORDSHIRE COUNCIL AT DEADLINE 6

2.01 Luton Borough Council raise concerns that parking demands above those predicted could be realised if the mode share targets are not achieved, and that additional parking demand would be generated at off airport locations. This, the Council go on to state, may lead to increased pressure for long term parking provision in surrounding areas, and the implications of this need should be considered as part of the DCO application. The same authority accepts in their latest Statement of Common Ground with Luton Rising, that third party car parking facilities are not under the control of the Applicant, and there is no commercial arrangement present to enable monitoring to be carried out; albeit that according to the Applicant *"there will be some growth in off-site parking, proportionate with the on-site parking growth, though a proportionate split will be maintained."* [Document REP6-028]

2.02 It is decidedly unclear given an accepted need for some growth in future long term off airport related car parking, at a time when the Council acknowledges that the Applicant has no control over this sector of the market; how the proportionate split in the growth of on and off-airport related car parking will be achieved. To this end, reliance on car parking management schemes alone will not achieve the desired result [Document REP6-028]

2.03 A more considered response is forthcoming from Central Bedfordshire Council in the latest Statement of Common Ground between London Luton Airport Limited and the same Council [Document REP6-029]. Central Bedfordshire Council raise similar concerns, in that parking demands above those predicted could be realised if mode share

targets are not achieved, resulting in additional parking demand being generated at off-airport locations.

- 2.04 In the same document, Central Bedfordshire Council state that there may be increased pressure for long term parking provisions in surrounding areas, and the implications surrounding this issue need to be considered as part of the application for Development Consent. Their concerns relate to both formal “off-site” car parking, which already provides for a large proportion of the existing airport’s parking, and which they claim has not been modelled as expanding in line with the increases in all other modes of access, as well as “fly-parking” on surrounding streets in existing communities.
- 2.05 Holiday Extras Ltd would concur with the points raised by Central Bedfordshire Council in **Document REP6-029** that simply limiting on-airport parking supply in the proportions advocated by the Applicant will not of its own suppress the demand to travel by car, neither will it lead to a proportionate split in the growth of on and off-airport related passenger car parking as advocated by the Applicant.
- 2.06 The representations raised by Central Bedfordshire Council in **Document REP6-029** are also required to be seen in the context of a number of factors. Firstly, Table 9.5 of **Document APP 205** reveals that the Applicant has assumed there would be a 5.2% increase in private car (off-site) car parking at Phase 1 of the proposed development in 2027; a 5% increase at Phase 2A in 2039, and a 5% increase in Phase 2B in 2043. These figures in turn are required to be examined in the light of the fact that the maximum number of car parking spaces currently available at my client’s site at Slip End is equivalent to 84% of all anticipated long-stay on-airport car parking in 2043, at which time passenger throughput is expected to reach 32mpppa, the Luton DART will have been constructed serving two terminals, with improvements to the frequency and availability of bus and train provision.
- 2.07 Secondly, CAA Passenger Survey Data 2017-2019 shows London Luton Airport had a noticeably higher taxi/minicab/Uber mode share than London Stansted Airport, and whilst published CAA data does not disaggregate the car mode share, a factor confirmed by the Applicant, it is nevertheless acknowledged by Luton Rising “*It would be reasonable to assume that there would be a higher proportion of private drop-off/pick-up trips at Luton*”

(Applicant's Response to TT 1.13 in **Document REP6-061**). This is a matter evident from Table 6.2 of **Document AS-123**.

- 2.08 The attractiveness for passengers using private drop-off/pick-up modes, arguably the least sustainable mode of access to the airport, is in my client's opinion only likely to increase, given these statistics, along with the fact that at Phase 2a of the development, the forecourt at Terminal 2 will include kerb space for approximately 56 drop off spaces and approximately 16 taxi spaces. These figures increase to approximately 100 drop off kerb side spaces and approximately 49 kerb side taxi spaces at Phase 2b. [**Document AS-123**]
- 2.09 My clients consider that the issues raised by Luton Borough and Central Bedfordshire Councils relating to on and off-airport car parking provision require the Applicant to be proactive in undertaking its baseline surveys and resurveys governing all forms of airport related car parking in neighbouring communities. A more collaborative approach is necessary between those lawful long-term off-airport car parking providers, the Applicant and adjoining local authorities, if the Applicant's intentions are to be achieved. In my clients' experience, the necessary time and expense in undertaking robust surveys places additional burdens on Local Planning Authorities, resulting in the same work being afforded less priority, given other time and revenue constraints imposed on Councils.
- 2.10 As a supporter of the proposed DCO application, Holiday Extras Ltd understand the significant consequences for the Applicant in the event the reasonable worst case modal share figures are not met, emphasising why a collaborative approach to long term off-airport car parking provision is considered appropriate, where at present none exists.
- 3.00 HOLIDAY EXTRAS LIMITED'S COMMENTS ON THE APPLICANT'S RESPONSES TO THE WRITTEN QUESTIONS ON SURFACE ACCESS - REP4-069**
- 3.01 The Applicant has indicated that it is not appropriate to set specific mode share targets for the first Travel Plan at this stage, due to the significant variation in recent mode share trends as a result of the Covid-19 pandemic and potential time-lag until those targets have come into force, since otherwise it could render the figures out-of-date, unreflective of mode share levels at the time the Examination has been concluded. [**Applicant's response to TT.1.8 in Document REP-059**]

- 3.02 My clients appreciate the reasoning behind this move, but would point out surface access mode share targets as part of any future Travel Plan will be confronted with possible increases in “drop-off/pick-up” and airport related car parking outside the airport boundary, as a consequence of the time taken to reconstruct the Terminal 2 Car Park damaged by the fire in October of last year.
- 3.03 The Applicant has accepted in **Document REP6-059** in response to Question TT.1.17, that bus and coach services are not within the Applicant’s control, but there will be engagement with relevant parties through the Airport Transport Forum. An additional time lag is likely, before establishing any commercially viable routes funded by the transport operator, along with the receipt of additional support from the Sustainable Transport Fund (STF), a process which will have an impact on future route use and viability considerations in the short or medium term. This is a matter which becomes apparent from the Applicant’s own response to Questions TT.1.17 and TT.1.18 forming part of **Document REP6-059** viz:

“The Applicant and operator are supportive of measures to improve sustainable travel modes and will work with local authorities and bus and coach service providers to implement improvements wherever reasonably practicable....”

The Applicant and operators are engaging in discussions with local operators to develop understanding of their current and planned routes, and what interventions and measures would enhance their service offering. Engagement is ongoing and is supported by the applicant's study into current gaps in bus provision and areas that would most benefit from improved/new services.”

“The Sustainable Transport Fund will be used to fund improvements to sustainable transport options including services and infrastructure related to public transport and cycling and walking. It will contribute towards realising the Surface Access Strategy’s Vision, Objectives and Priority Areas, aligned to targets as set out in the successive Travel Plans.

***The FTP identifies a number of bus improvements, including new, improved and extended services, although it is noted that this is not an exhaustive list of potential interventions, which can be added to. Interventions to be taken forward will be determined on production of the first Travel Plan post-consent, and in successive five-yearly Travel Plans. Funding for bus services has been raised by local authorities as a future intervention for the TPs, however, no interventions will be selected until the formation of the ATF Steering Group, post-consent. Therefore, the STF could be used for this purpose, among a number of other possible interventions identified in the FTP.”** (my emphasis)*

- 3.04 Whether there is sufficient funding available from the STF and/or the Residual Impact Fund (RTF) forming part of the TRIMMA, to make a meaningful contribution to improvements in bus and coach services to London Luton Airport, seen from both a qualitative and quantitative perspective, is a matter which at the present time remains unknown.
- 3.05 A figure of 16,000 short, mid and long-stay car parking spaces provided on-airport at a throughput of 32mppa, has been derived from a baseline of 10,550 on-airport car parking spaces in 2019 at a throughput of 18mppa. The manner in which on-airport passenger car parking provision over the duration of the DCO application has been calculated is not provided in a way which enables either the Executive Authority, or Interested Parties to obtain a clear explanation of the processes involved, or to be able to assess the selected methodology. On the contrary, the response from the Applicant is decidedly vague as **Document REP6-053** confirms:
- “The 2019 parking provision reflects the accessibility of the airport, vehicle arrival and departure profile, car occupancy and the duration of stay, which effectively defines the total car parking required. The profile has been used as a proxy for the future year, with the growth in passengers applied along with the mode shift from private car (on site car park) to public transport, in order to establish the car parking requirements for the expanded airport”.*
- 3.06 **Document REP6-065** comprises the Applicant’s post-hearing submissions arising from Issue Specific Hearing 7 (ISH7) and in particular their response to various Action Points set out by the Examining Authority. Action Point 15 requires the Applicant to provide mode share targets (passengers and staff) that would be required to reduce the number of vehicles travelling to the airport for each of the Phases, at the same time provide details to explain if these targets would be achievable. This is a matter which has been left for the Applicant to address at the Deadline 7 stage.
- 3.07 Action Point 18 referred to in **Document REP6-065** requires the Applicant and Luton Borough Council to detail potential options to mitigate the fly-parking issue over the Luton area, including exploring whether a Controlled Parking Zone could be progressed/would be viable, and how these measures could be funded without any cost to residents. My clients contributed to the discussions on funding mechanisms, but it is noted that this Action is to be addressed by the Applicant at the Deadline 7 stage, and so, as along with Action Point 15, this is a matter which my client will leave for consideration when the information is available.

- 3.08 The subject of on-site car parking is referred to in **Document REP6-065**, with Action Point 19 requesting the Applicant to confirm what was the actual number of passengers for the January to August time period given in **Document REP4-069**. If this was below the equivalent 18mppa, the Applicant was required to explain why the baseline number would be sufficient for 18mppa. In this regard, the Examining Authority had referred to the Applicant's response to Question TT.1.13 [**Document REP4-069**], in which it was stated that off-site car parking would provide part of the future parking supply for the airport. The Applicant has been requested to provide information on how many spaces were presumed to be provided, and what would happen if these were not provided.
- 3.09 It is suffice to say that the Applicant acknowledged that a market for off-site car parking would exist, with car parking operators expected to submit applications to meet that demand. It was confirmed that if that supply did not materialise, controls in the Green Controlled Growth Framework would prevent the airport from growing unsustainably. It is therefore implicit in the Applicant's response, that severe consequences will arise to the continuing success of the local economy if this supply is not met through successful applications for long term off-airport car parking.
- 3.10 It requires that the baseline information relating to existing long term off-airport car parking provision as set out in the Applicant's Transport Assessment is as accurate as possible, given that it represents the starting point for calculating the extent of future long term off-airport car parking capacity, at a time when long term off-airport car parking providers are expected to play an important role in contributing to airport related passenger car parking over the duration of the DCO application.
- 3.11 In its response to Action Point 19, the Applicant set out a table showing the number of passengers handled by London Luton Airport between January and August 2023, along with equivalent figures for 2019 when the airport handled 18mppa and had 10,550 spaces, being commensurate with the level of car parking required at the point when the airport reached the permitted capacity of 18mppa. This table is reproduced overleaf.

| Year | Passengers/month (millions) | | Total (m) | Apr | May | Jun | Jul | Aug | |
|------------------|-----------------------------|--------|-----------|--------|--------|--------|--------|--------|--------|
| | Jan | Feb | | | | | | | |
| 2019 | 1.154 | 1.180 | 1.339 | 1.536 | 1.637 | 1.674 | 1.783 | 1.871 | 12.173 |
| 2023 | 0.977 | 1.058 | 1.231 | 1.385 | 1.515 | 1.528 | 1.621 | 1.668 | 10.983 |
| Change from 2019 | -0.177 | -0.121 | -0.108 | -0.151 | -0.121 | -0.147 | -0.162 | -0.203 | -1.189 |

* Passenger numbers rounded to nearest 1,000

- 3.12 The fact that the 2023 passenger figures in the above table are approximately 10% lower than 2019 is not surprising given the intervening Covid-19 pandemic. What perhaps is worth noting is the speed at which passenger figures have recovered over a very short period, to the extent that average daily peak utilisation during the period January to August 2023 is approximately 80% of capacity, with the car parks being full at the busiest times.
- 3.13 These figures have taken no account of the lawfulness of certain long term off-airport car parking sites, with the site situated to the rear of Eden Brae Business Park, Dunstable Road, Caddington LU1 4FF having been the subject of three refusals of planning permission, each of which was subsequently dismissed at appeal. Furthermore, given that on-airport passenger car parks are already operating at capacity during peak periods, the same figures point to the need to ensure that future long term off-airport car parking provision is made available at the earliest opportunity.
- 3.14 In this way, sufficient headroom should be provided in order to take into account various future growth scenarios involving the airport; the reduction in capacity on-airport due to the Terminal 2 Car Park fire; the loss of 791 spaces due to the construction of the DART; along with the expressed intention that the airport is only planning for an additional 5,450 on-airport car parking spaces throughout the entire DCO application period to 2043. The implications of not having sufficient headroom, seen from the perspective of indiscriminate parking in residential streets, is a matter already experienced by both local authorities and their communities.
- 3.15 **Document AS-123** states at paragraph 5.6.7 *“The third party operated car parking capacity in 2019 was at least 6,800 spaces, and a large proportion of this parking was at Slip End, which is in Central Bedfordshire, near M1 Junction 10.”* According to the Applicant, *“Holiday Extras are clearly a really important partner at the airport”*, a matter confirmed in **Document EV9-006**.

In its response to the Examining Authority's Written Question TT.1.13 the Applicant states in **Document REP4-069**:

"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 is received from the Local Planning Authority with regard to additional or extended off-site parking facilities." (my emphasis)

- 3.16 The evidence presented at the Secretaries of State's "called-in" inquiry relating to the expansion of London Luton Airport from 18mppa to 19mppa, held during September and November 2022 and January 2023 considered the issue of car parking at paragraphs 8.75 to 8.78 inclusive of the Inspectors Report. Paragraph 8.77 of the Inspectors Report is of particular relevance when assessing current long term off-airport car parking provision:

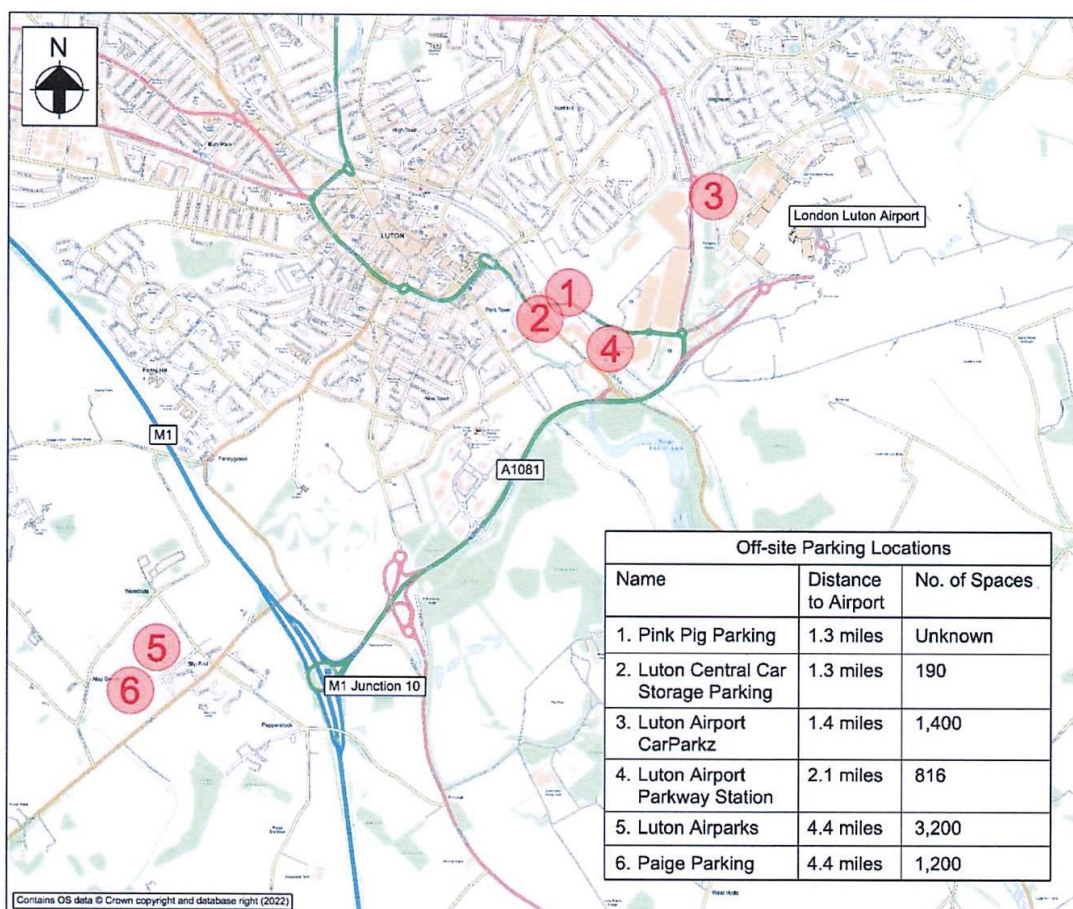
"8.77 LLAOL operated four public car parks with a total of 9,055 spaces. There is also third party operated public car parking linked with shuttle buses with 1500 such spaces having been added since 2019. Since 2019, when LLA managed a throughput of 18mppa, public car parking capacity has increased by 22.3%. There is sufficient capacity to accommodate the additional passengers."

- 3.17 It is apparent from the evidence presented to the "called in" inquiry that the figure relating to the increase in public car parking capacity of 22.3% is a total combined parking capacity figure. The total combined parking capacity at the time of the inquiry comprised 9,055 car parking spaces made up of long stay provision (4,151 parking spaces); mid stay provision (1,281 parking spaces); Terminal Car Park 1 (1,699 parking spaces), and Terminal 2 (1,924 parking spaces). These figures are confirmed at paragraph 179 of the closing submissions presented on behalf of Counsel for LLAOL.
- 3.18 In addition to the 9,055 on-airport car parking spaces, a separate figure of 9,690 spaces relating to long term off-airport car parking operators was relied upon. The figure of 9,690 comprised 4,890 spaces attributable to my client's site at Slip End; 500 spaces attributable to Maple Parking; 3,000 spaces provided to the east of Vauxhall Road;

various meet-and-greet operators contributing approximately 1,000 spaces, and a self-park and meet-and-greet facility operated by Airport Parking Luton comprising 300 spaces.

- 3.19 The increase of 22.3% between 2019 and the date of the “called-in” inquiry seen in terms of the total combined parking capacity, is derived from 15,321 spaces available in 2019 rising to 18,745 spaces [9,055 on-airport + 9,690 off-airport] at the time of the “called-in” inquiry.
- 3.20 It is my client’s view that the total combined parking capacity figure of 15,321 car parking spaces available in 2019 at the time of the “called in” inquiry does not reflect Table 8.2 of **Document AS-123** which reveals that at the point when the airport reached the permitted capacity of 18mppa in 2019, there was a total of 10,550 on-airport passenger car parking spaces devoted to short, mid and long stay, and not a figure of 9,055 spaces as outlined at the time of the “called-in” application.
- 3.21 If the on-airport passenger car parking figure of 10,550 spaces is substituted for the on-airport car parking figure of 9,055, then the number of long term off-airport car parking spaces available in 2019 would only amount to 4,471 spaces, if the total combined parking capacity of 15,321 spaces is relied upon in the same year. This situation would only account for my client’s site at Slip End, with no other provision relating to long term off-airport car parking providers, and therefore cannot be correct.
- 3.22 Figure 5.13 found at page 70 of **Document AS-123** is set out overleaf, having been the subject of consideration by my clients. I am advised as follows:
- a) Site 1 said to be occupied by Pink Pig Parking is no longer used for long term off-airport car parking purposes, having been redeveloped for residential purposes. The Pink Pig brand was bought out by the operator known as Airport Parking Luton and is no longer present in the market.
 - b) Site 2 is not operated by Luton Central Car Parking Storage, but is occupied by Maple Parking with a capacity of 400 spaces, and not 190 as indicated in the above schedule.

Figure 5.13: Additional third party operated car parking facilities



- c) Site 3 is no longer used by Luton Airport CarParkz and according to my client the company has ceased trading. It is understood that the same company used the lower part of Vauxhall Way for long term off-airport car parking purposes. Site 3 which runs parallel with the eastern side of Vauxhall Way is occupied by Airport Parking Luton with a capacity of 2,400 cars being occupied for both self-park, block park and meet-and-greet purposes. It has a capacity greater than 1,400 cars outlined in the schedule.
- d) Site 4 was previously used by Airport Parking Luton but this company has moved to the Vauxhall Way site. My clients are not aware of any long term off-airport car parking company using the Luton Airport Parkway Station Multi-Storey Car Park for off-airport car purposes.
- e) Sites 5 and 6 are used by my client's subsidiary company, Airparks Services Ltd, which took over Site 6 from Paige Parking. A combined figure of more than 4,400

spaces relates to Sites 5 and 6, being in use for both block park and self-park purposes, but having the capacity to extend to 5,500 spaces during peak periods when it is used exclusively for block parking purposes.

3.23 A more accurate schedule of existing long term off-airport car parking sites associated with London Luton Airport has been provided by my clients in the Table 1 below. It is based on normal operating levels and does not relate to peak periods, at which time capacity may increase as a consequence of customers cars being block parked as opposed to relying on a self-park format. In considering Table 1 below, Airport Parking Luton is the operator of not only land to the east of Vauxhall Way, but also the site referred to as Auction House, the latter used for self-park and block parking purposes.

TABLE 1 – Existing Long Term Off-Airport Car Parking Companies at London Luton Airport

| LUTON AIRPORT - OFF AIRPORT PARKING | | | | | | |
|-------------------------------------|--------------|--|--|--|--|--|
| Operator | Spaces | | | | | |
| Airparks | 4,577 | | | | | |
| Blue Circle Parking | 1,000 | | | | | |
| Maple Parking | 400 | | | | | |
| Airport Parking Luton | 3,060 | | | | | |
| Luton 247 Airport Parking | 100 | | | | | |
| Total | 9,137 | | | | | |

| Operator | Car Park / Product | Spaces | Car Park or Storage | Car Park / Storage Name | Car Park / Storage Postcode | Block, Self Park or M&G |
|---------------------------|--------------------|--------------|---------------------|-------------------------|-----------------------------|-------------------------|
| Airparks | Slip End | 3,082 | Block | Slip End | LU1 4BZ | Self Park & Block |
| | | 1,495 | Self Park | | | |
| | | 4,577 | Total | | | |
| Blue Circle Parking | Meet & Greet | 1,000 | Storage | Caddington | LU1 4FF | Block |
| Maple Parking | Meet & Greet | 400 | Storage | Kimpton Rd | LU2 0SX | Block |
| Airport Parking Luton | Park & Ride | 1,000 | Car Park | Vauxhall Way | LU2 9HD | Self Park |
| | Park & Ride | 350 | Car Park | Vauxhall Way | LU2 9HD | Block |
| | Park & Ride | 450 | Car Park | Vauxhall Way | LU2 9HD | Self Park |
| | Meet & Greet | 600 | Storage | Vauxhall Way | LU2 9HD | M&G |
| Auction House | Park & Ride | 200 | Car Park | Auction House | LU2 0AH | Self Park |
| Auction House | Park & Ride | 460 | Car Park | Auction House | LU2 0AH | Block |
| Luton 247 Airport Parking | Meet & Greet | 100 | Car Park | 17-19 Guilford Street | LU1 2NQ | Block |

Source: Airparks Services Ltd

3.24 It can be seen that the total figure of existing long term off-airport car parking spaces amounts to 9,137, which is within 6% of the figure of 9,690 provided at the time of the “called-in” inquiry into the expansion of London Luton Airport from 18mppa to 19mppa. Hence, it is a far more reliable representation of existing long term off-airport related car parking provision than the 6,800 spaces devoted to long term off-airport car parking quoted by the Applicant in **Document AS-123** and subsequent documents.

3.25 The Table outlined below has been taken from page 33 of **Document REP6-065** and represents the Applicant’s response to the Examining Authority’s Action Point 20, in which they were asked to detail the number of spaces that the Transport Assessment (TA) assumed would be provided by third party car parks, and to explain how this was determined, including signposting where this information can be found in the DCO application.

| | Year | | | |
|---|---------------|-------------------------|--------------------------|--------------------------|
| | 2019 Baseline | 2027 Assessment Phase 1 | 2039 Assessment Phase 2a | 2043 Assessment Phase 2b |
| | 18mppa | 21.5mppa | 27mppa | 32mppa |
| Total off-site car parking | 6,800 | 7,480 | 9,520 | 10,880 |
| Additional off-site parking requirement compared to 2019 Baseline | - | +680 | +2,720 | +4,080 |

3.26 It is considered important that the Examining Authority use the most up to date and accurate information relating to future long term off-airport car parking provision, being that found in Table 1 prepared by my clients, outlining Existing Long Term Off-Airport Car Parking Companies at London Luton Airport, seen alongside the existing provision of 10,550 on-airport car parking spaces. To rely on the table prepared by the Applicant at a base date of 2019 in 2024 is likely to result in an underestimation of forecast long term off-airport car parking spaces required over the duration of the DCO application.

3.27 The Applicant states in response to Action Point 20 that the growth in passengers for each phase of the expanded airport has been applied to the total baseline parking spaces which should be that in evidence today, before adding that *“an adjustment has been made to reflect the forecast change in off site car park mode share from 2019.”* It is not clear what this adjustment figure amounts to, or how it has been calculated, but a more accurate approach in terms of methodology would be to apply existing on and off airport car parking provision, taking into account the existence of the Terminal 2 Car Park. It is understood that the forecast in off-site car park mode share has been applied to the total number of passengers in each phase of the development.

3.28 The inevitable consequence of not taking into account the most up to date information governing long term off-airport car parking spaces, seen in conjunction with existing on-

airport car parking provision today, is likely to be an increase in incidents of fly-parking on surrounding residential streets, with a possible introduction of unauthorised long term off-airport car parking sites. This is regardless of any enforcement proceedings which may be contemplated by Central Bedfordshire Council with respect to the site at the Eden Brae Business Park, Dunstable Road, Caddington operated by Blue Circle Car Parking, where 1,000 spaces have recently been available.

4.00 FUTURE LONG TERM OFF-AIRPORT CAR PARKING PROVISION

4.01 I referred at the ISH7 to the difficulties in securing planning permission for long term off-airport car parking in Green Belt locations, but that is not to say that sites have not come forward and been granted planning permission in such designated areas, as decisions relating to the Bristol Green Belt and North Cheshire Green Belt near Manchester confirm. In the majority of cases, this requires a robust case being advanced on behalf of the applicant under the “*very special circumstances*” test. In certain circumstances it may be justified in accordance with the provisions of paragraph 154g) of the NPPF 2023.



**Land at the Eden Brae Business Park, Dunstable Road, Caddington,
Bedfordshire LU1 4FF**

- 4.02 It has been noted in **Document REP6-089** that Central Bedfordshire Council have referred to circumstances where temporary permissions were granted for long term off-airport car parking purposes on land at the rear of the Eden Brae Business Park, Dunstable Road, Caddington, Bedfordshire LU1 4FF on two successive occasions in accordance with Reference Nos CB/16/01997/FULL and CB/18/04111/FULL, at which time Green Belt policy had not materially changed from that in evidence today, and where the issue relating to the purposes and openness of this part of the Metropolitan Green Belt would have been assessed no differently as a consequence of the application seeking a temporary permission, as opposed to one requesting permanent permission.
- 4.03 It is accepted that subsequent applications have been refused permission, with the resultant appeals dismissed on 21st February 2018, 4th June 2020 and 19th October 2023. These have been on the basis that extensions beyond the authorised area of the site occurred, particularly to the west, with the consequence that openness seen from both a spatial and visual aspect was adversely impacted. In essence, recent dismissed appeal decisions are a consequence of the inability of the applicant to adhere to earlier restrictions governing the area to be used for temporary airport related car parking, with the appeal site being visible from developed areas immediately to the north and west within the complex of mainly commercial buildings.