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# London Luton Airport Expansion

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**8.119 Applicant's Response to Issue Specific Hearing 4 Action  
26 and Issue Specific Hearing 7 Action 10 - Sustainable  
Transport Fund**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.119

**The Planning Act 2008**

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

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

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**8.119 APPLICANT'S RESPONSE TO ISSUE SPECIFIC HEARING 4  
ACTION 26 AND ISSUE SPECIFIC HEARING 7 ACTION 10 –  
SUSTAINABLE TRANSPORT FUND**

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# 1 INTRODUCTION

## 1.1 The Proposed Development

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

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

## 1.2 Purpose of this document

1.2.1 The primary purpose of this document is to set out the framework for the Proposed Development's future Sustainable Transport Fund (STF) and its governance, source, size and scope. This updated STF Paper reflects updates following engagement with the Host Authorities and Buckinghamshire Council.

1.2.2 Updates comprise the significant increase in the value of the fund and introduction of the opportunity to pump prime interventions which have been added to increase stakeholder confidence in the fund and its ability to deliver significant interventions in accordance with the future Travel Plans.

## 1.3 What is the Sustainable Transport Fund?

1.3.1 The STF will be generated through levies on on-site airport passenger parking transactions, and will be used to fund interventions aimed at improving sustainable travel options for accessing the airport. It supports the implementation of interventions proposed in the Travel Plans, which are to be produced five-yearly as outlined in the **Framework Travel Plan [REP4-044]**. The STF is secured through a s106 agreement, a draft of which was submitted at Deadline 7 as **Draft Section 106 Agreement [TR020001/APP/8.167]**.

1.3.2 By establishing the STF, the Applicant is demonstrating its commitment to achieving the targets that will be set in the five-yearly Travel Plans. As will be outlined in this paper, the increase in the size of the fund is significant and reflects the level of ambition that the Applicant has to deliver high quality sustainable transport interventions as the airport expands.

## 1.4 Updates since previous submission

1.4.1 The STF has been updated in the following ways since the previous submission at Deadline 5 **[REP5-056]**:

- a. The proposed levies have been adjusted, from £0.25 per parking transaction and £0.10 per drop-off transaction to £0.20 and £0.30 respectively, resulting in a significant increase in the forecast cumulative value of the fund from £18.5m to £37m.

- b. An error in Table 2.1, identified by Buckinghamshire Council, has been corrected.
- c. Reference to the draft s106 agreement has been included in the document, in relation to pump priming the fund and its terms of use more generally. The s106 agreement is the subject of separate ongoing discussions and a draft has been submitted at Deadline 7 as **Draft Section 106 Agreement [TR020001/APP/8.167]**.
- d. Specific limits on funding in relation to each priority area have been removed following engagement and feedback received.

## 2 LONDON LUTON AIRPORT SUSTAINABLE TRANSPORT FUND

2.1.1 This section provides detail on the fund's source, size, and scope to demonstrate how interventions and measures set out in the **Framework Travel Plan (FTP) [REP4-044]** would be delivered.

### 2.2 Funding Source

2.2.1 The source of the STF will be a levy on on-site passenger car parking (short, mid and long stay) and on-site passenger drop-off. The fund will be generated from a charge per transaction on passenger vehicles.

2.2.2 There is no charge (or transaction) for *Mid Stay Car Park – Gate* (under 15 minutes) and *Long Stay Car Park – Gate* (under one hour). These free periods have been introduced to reduce the risk of drop offs around the airport boundary and to mitigate short term fly parking issues. Between June 2022 and May 2023, 684,000 vehicles made use of this free period. The car parks and drop off zones that will contribute a levy to the STF are indicated in Table 2.1.

Table 2.1: Car parks included in the STF

Car Park Type	Inclusion in STF?
TCP1 (Self-Park) - Gate	Yes
TCP2 (Self-Park) - Gate	Yes
Mid Stay Car Park - Gate	Yes
Long Stay Car Park - Gate	Yes
Drop-Off Zone (DOZ)	Yes
TCP1 (Self-Park) - Pre Book	Yes
TCP2 (Self-Park) - Pre Book	Yes
Mid Stay Car Park - Pre Book	Yes
Long Stay Car Park - Pre Book	Yes
Priority Parking - Pre Book	Yes
Mid Stay Car Park – Gate (Under 15 minutes)	No
Long Stay Car Park – Gate (Under one hour)	No

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

2.2.4 The fund will be collected and administered by the airport operator, as the operator of the on-site parking and drop-off areas.

2.2.5 Funds will start to be collected following the serving of notice to grow under article 44(1) of the DCO, which triggers the transition from the existing planning requirements to those established under the DCO. This is assumed to occur in 2025 (for the purposes of fund size forecasting).

## 2.3 Fund Size

2.3.1 Since the previous version of this Paper, the parking levy has been adjusted to generate an increase in the value of the fund to increase stakeholder confidence in the ability of the fund to achieve the ambitious targets to be set out in future Travel Plans. This has doubled the forecast cumulative fund value from £18.5m to £37m.

2.3.2 The fund has been sized based on the following assumptions and considerations:

- a. Full year data of parking and drop-off transactions up to May 2023, received from the airport operator, to determine a baseline vehicle demand.
- b. Passenger forecasts from the **Need Case [AS-125]** for the Core Planning Case, Faster Growth Case, and Slower Growth Case.
- c. The forecast fund size has been calculated from the baseline number of transactions and factored up in alignment with the increase in parking supply outlined in Table ES.1 in the **Transport Assessment [APP-203]**, corresponding to each assessment phase. Between assessment phases, growth in revenue has been calculated proportionate to the change in passenger throughput, for each of the three cases. This assumes that the car park occupancy rate will be maintained for the duration of the Proposed Development. Actual fund size may vary if car park occupancy rates change over time.
- d. Annual inflation forecasts have been applied in the levy and revenues discussed in this document. The **Draft Section 106 Agreement [TR020001/APP/8.167]** sets out the process for index linking the fund.
- e. The levy has been set at £0.20 per passenger parking transaction and £0.30 per passenger drop-off.
- f. No levy has been applied to parking products which currently do not have a charge: Mid Stay Car Park - Gate (Under 15 minutes) and Long Stay Car Park - Gate (under one hour).
- g. The first year the levy would be collected is 2025 on the assumption that this is when the airport's notice to grow will be triggered. Levy revenue for 2022-2023 is shown in Table 2.2 to demonstrate what the fund size would be if it was currently being collected, based on the latest available data.

2.3.3 Table 2.2 presents existing passenger parking and drop-off transactions at the airport for the year June 2022 to May 2023. The levy defined above is applied to this data for 2023 for illustrative purposes only to demonstrate the size of an STF for this same period.

2.3.4 It is noted that the TCP2 car park fire in October 2023 has affected the supply of passenger parking and drop off facilities at the airport. At the present time, it is difficult to state when the car park will re-open and so the potential value of funds

raised by the car parking levy in the first year or two of the STF cannot be confirmed at this time.

Table 2.2: Current car park transactions at London Luton Airport

<b>Paid Transactions</b>	<b>Number of transactions (Jun 22 - May 23)</b>	<b>Proposed levy</b>	<b>Levy revenue</b>
TCP 1 (Self-Park) - Gate	208,000	£0.20	<b>£42,000</b>
TCP 2 (Self-Park) - Gate	226,000	£0.20	<b>£45,000</b>
Mid Stay Car Park - Gate	62,000	£0.20	<b>£12,000</b>
Long Stay Car Park - Gate	36,000	£0.20	<b>£7,000</b>
Drop-Off Zone (DOZ)	2,847,000	£0.30	<b>£854,000</b>
TCP 1 (Self-Park) - Pre Book	51,000	£0.20	<b>£10,000</b>
TCP 2 (Self-Park) - Pre Book	82,000	£0.20	<b>£16,000</b>
Mid Stay Car Park - Pre Book	77,000	£0.20	<b>£15,000</b>
Long Stay Car Park - Pre Book	156,000	£0.20	<b>£31,000</b>
Priority Parking - Pre Book	27,000	£0.20	<b>£5,000</b>
Mid Stay Car Park – Gate (Under 15 minutes)	311,000	£0	<b>£0</b>
Long Stay Car Park – Gate (Under one hour)	373,000	£0	<b>£0</b>
<b>Total</b>	<b>4,456,000</b>	<b>-</b>	<b>£1,039,000</b>

2.3.5 The number of current transactions outlined in Table 2.2 has been extrapolated to each of the assessment phases, to inform forecast annual revenue from the levy; the forecast annual revenue is presented in Table 2.3. The table follows the assumptions previously set out in paragraph 2.3.1 and presents annual revenue only for the year of each assessment phase that the passenger capacity is predicted to be reached in the Core Planning Case, explained in paragraph 2.3.6.

### **Illustrative Growth Scenarios**

2.3.6 Table 2.3 lists the forecast annual revenue for the construction completion year for each assessment phase, with forecast transaction numbers based on existing transaction numbers, increased in proportion to the planned increase in parking provision. Figure 2.1 and Appendix A set out forecast total annual revenue for every year of the expansion through to 2049, based on three future demand forecasts of passenger growth outlined in the **Need Case [AS-125]**:



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

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

2.3.8 Figure 2.1 shows that the final year of the Proposed Development (i.e. the year that the predicted passenger capacity of 32 mppa is reached) for all growth scenarios will see annual revenue of £2,448,000 (based on stated levy) at 2023 prices. This illustration accounts for the fund cap introduced in Paragraph 2.3.15.

Table 2.3: Forecast transactions and levy revenue for the Core Planning Case growth scenario

<b>Baseline</b>			
<b>2023, 18 mppa</b>			
	<b>Annual transactions</b>	<b>Levy</b>	<b>Annual revenue</b>
<b>Car parks</b>	1,609,000	£0.20	<b>£185,000</b>
<b>Drop-Off Zone</b>	2,847,000	£0.30	<b>£854,000</b>
<b>Total</b>	<b>4,456,000</b>	-	<b>£1,039,000</b>
<b>Assessment Phase 1</b>			
<b>2027, 21.5 mppa</b>			
	<b>Annual transactions</b>	<b>Levy</b>	<b>Annual revenue</b>
<b>Car parks</b>	1,797,000	£0.22	<b>£225,000</b>
<b>Drop-Off Zone</b>	3,193,000	£0.33	<b>£1,049,000</b>
<b>Total</b>	<b>4,990,000</b>	-	<b>£1,274,000</b>
<b>Assessment Phase 2a</b>			
<b>2039, 27 mppa</b>			
	<b>Annual transactions</b>	<b>Levy</b>	<b>Annual revenue</b>
<b>Car parks</b>	2,085,000	£0.28	<b>£332,000</b>
<b>Drop-Off Zone</b>	3,693,000	£0.42	<b>£1,538,000</b>
<b>Total</b>	<b>5,778,000</b>	-	<b>£1,871,000</b>
<b>Assessment Phase 2b</b>			
<b>2043, 32 mppa</b>			
	<b>Annual transactions</b>	<b>Levy</b>	<b>Annual revenue</b>
<b>Car parks</b>	2,524,000	£0.30	<b>£436,000</b>
<b>Drop-Off Zone</b>	4,463,000	£0.45	<b>£2,012,000</b>
<b>Total</b>	<b>6,987,000</b>		<b>£2,448,000</b>

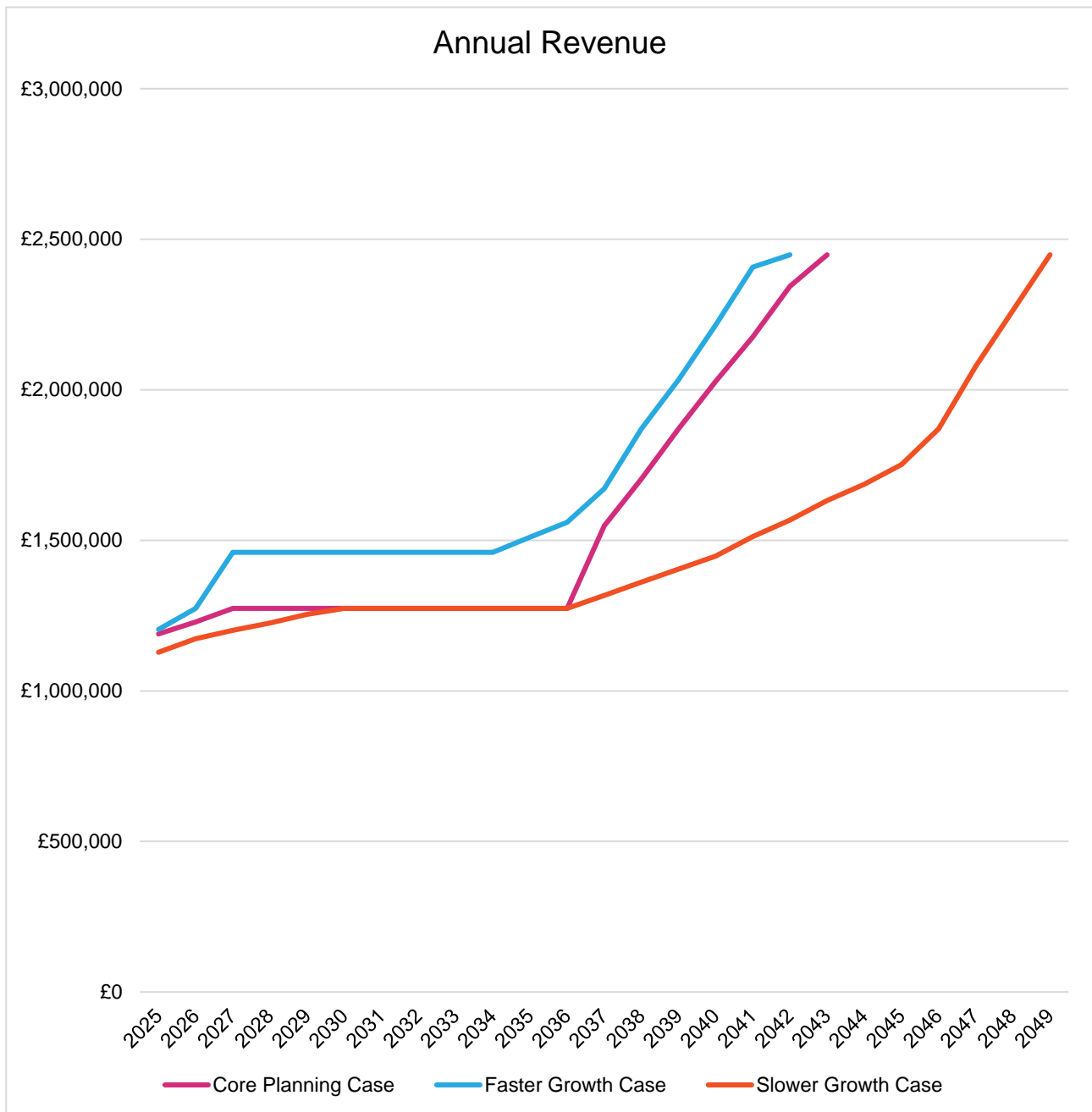


Figure 2.1: Forecast annual revenue across growth scenarios (with cap applied)

2.3.9 As demonstrated by Figure 2.1, the passenger forecasts result in variations to the annual levy raised over time. In all cases, the total raised each year would increase until the functional capacity of Terminal 1 is reached (21.5 mppa for the Core Planning Case and Slower Growth Case, and 23 mppa for the Faster Growth Case). There would then be a period of time where no further growth occurs whilst Terminal 2 is under construction, and therefore the annual levy would not increase. Finally, the growth in passengers would increase at varying rates up to the new passenger cap of 32 mppa, with the annual levy varying proportionally.

2.3.10 Figure 2.1 Highlights considerations when setting the fund size:

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

2.3.11 Figure 2.2 shows the increases in passenger volumes over the delivery of the Proposed Development, illustrating that there are multiple years where no growth in passenger volumes is forecast to occur.

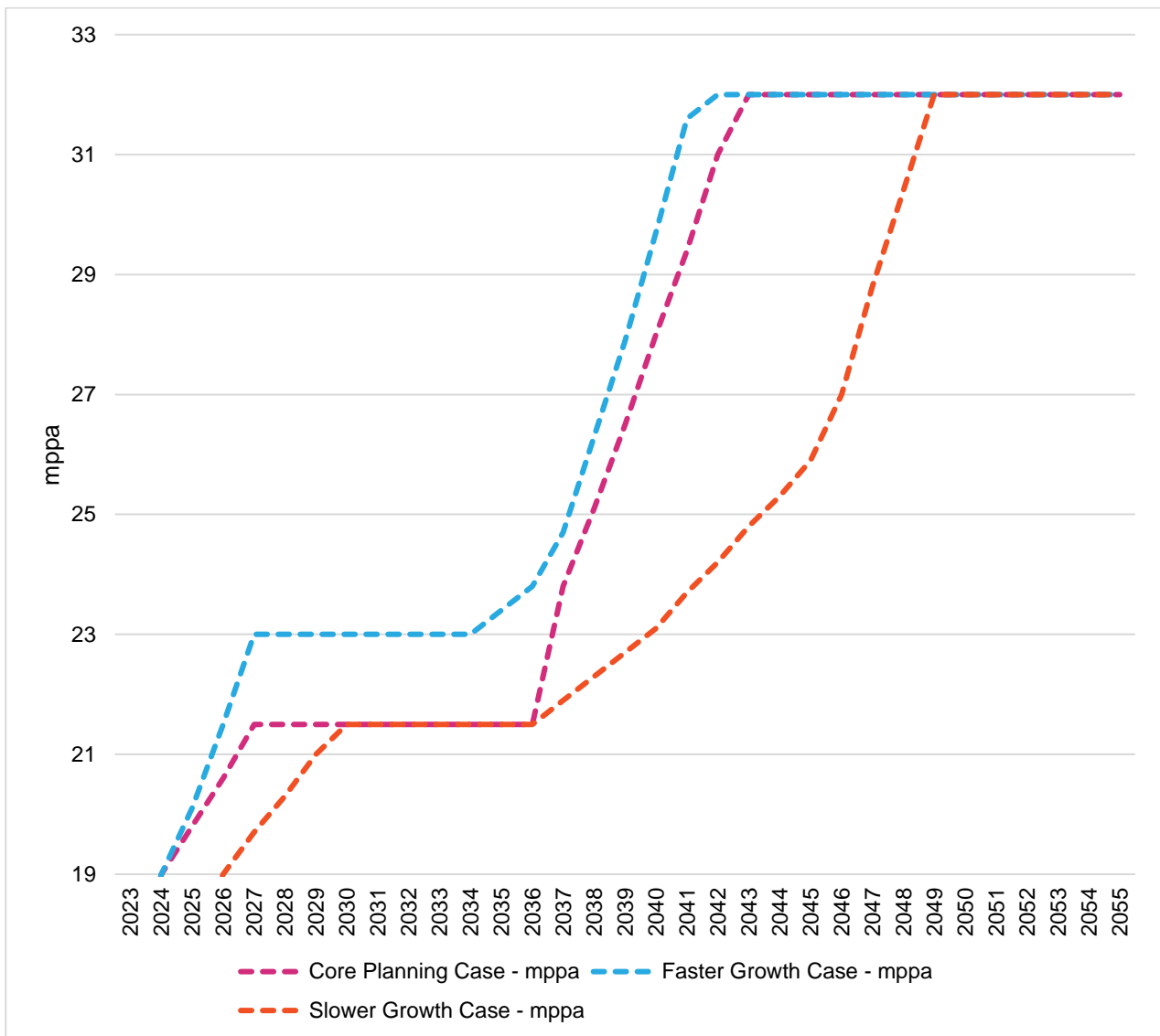


Figure 2.2: Changes in passenger volumes over the duration of the Proposed Development (mppa)

### Enabling early investment

2.3.12 Feedback from engagement with relevant highway authorities has raised the potential need for the fund to be of a sufficient size in the early years to enable

investment opportunities in new bus routes (subject to evidenced proposals and ATF Steering Group approval).

- 2.3.13 If the first Travel Plan demonstrates a need for early funding, in excess of the initial revenues of the STF being available or sufficient for the purpose, then the Applicant will make available up to £1,000,000 to 'pump-prime' the fund. The **Draft Section 106 Agreement [TR020001/APP/8.167]** sets out the approach to pump priming and states that the Applicant may recoup any contribution made in this way from future STF revenues.

### **Capping the fund**

- 2.3.14 A cap to the total value of the STF is considered a reasonable and proportionate approach having regard to the increased value of the STF and other ongoing surface access commitments made by the Applicant through the DCO, such as the ongoing need for surface access mode share Limits to be achieved, which applies in perpetuity. The proposed mechanism for determining the cap ensures the availability of funding is linked to the operational impacts of the Proposed Development. The cap is outlined as follows.
- 2.3.15 The maximum size of the STF will be reached when one of the following two scenarios is realised:
- a. Scenario A: the year in which maximum passenger throughput is first within 1 mppa of the DCO permitted cap.
  - b. Scenario B: When the size of fund reaches £37m (the maximum cumulative forecast fund contributions via any of the growth scenarios).
- 2.3.16 The **Draft Section 106 Agreement [TR020001/APP/8.167]** includes a commitment to continue to spend any remaining STF funds on sustainable transport when the airport reaches maximum passenger throughput instead of ending the fund completely at that point.

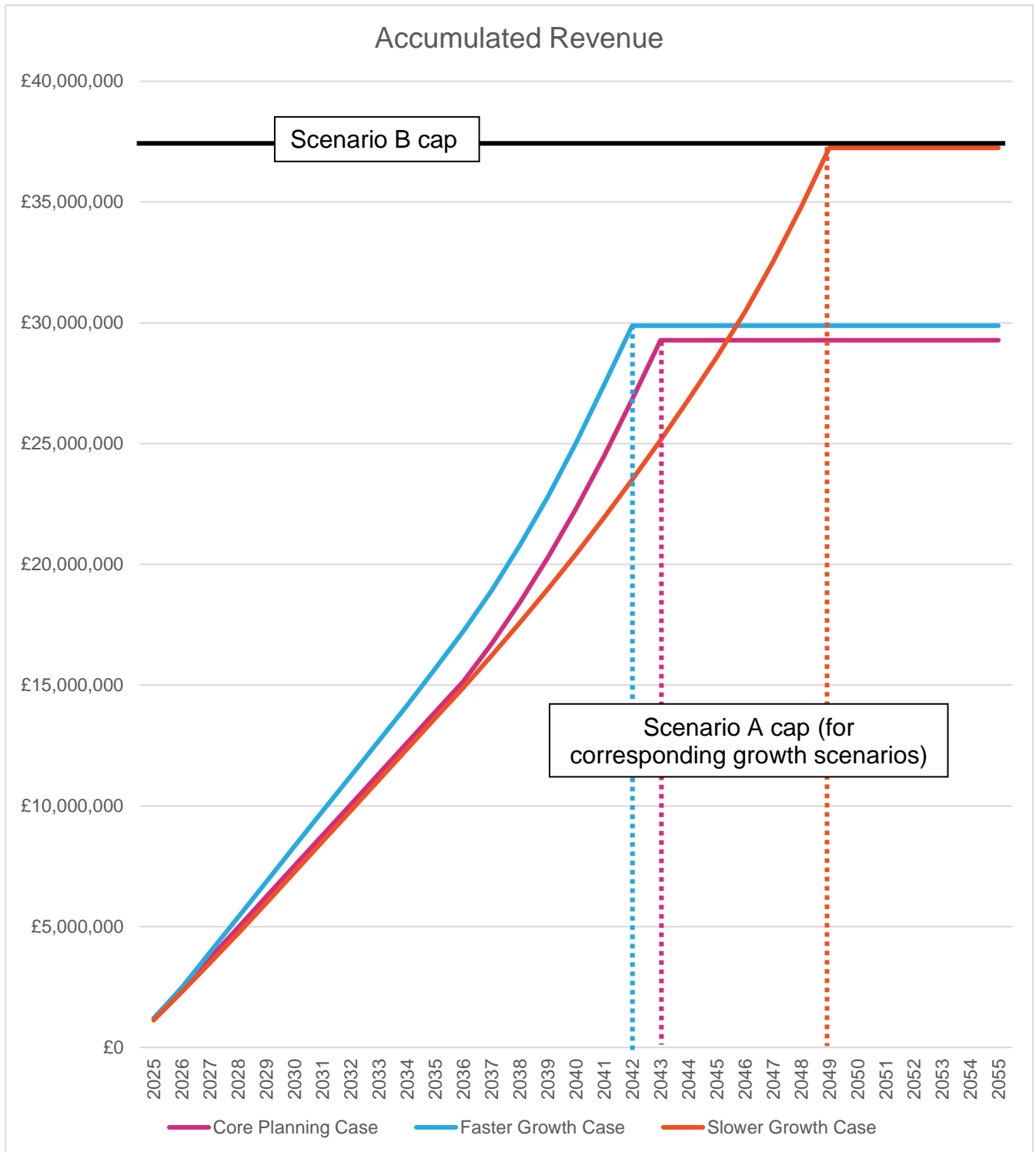


Figure 2.3: Forecast accumulated revenue across growth scenarios

## 2.4 Fund Scope

- 2.4.1 The STF's purpose will be to contribute towards realising the **Surface Access Strategy's [APP-228]** vision, objectives and priority areas as set out in the successive Travel Plans, with focused funding of interventions and measures identified through monitoring against targets.
- 2.4.2 Specific limits on funding in relation to each priority area have been removed following engagement and feedback received from the Host Authorities and Buckinghamshire Council.
- 2.4.3 The principles for the allocation of funding under the STF ("Terms of Use"), have been updated following engagement with the Host Authorities and Buckinghamshire Council and are contained within the **Draft Section 106 Agreement [TR020001/APP/8.167]**.
- 2.4.4 The operator will make funds available from the STF according to the recommendations of the ATF Steering Group such recommendations to be made in accordance with the following principles:
- a. **Purpose:** The STF's purpose will be to contribute towards realising the **Surface Access Strategy [APP-228]** vision, objectives and priority areas as set out in the successive Travel Plans, with focused funding of interventions and measures identified through monitoring against Travel Plan targets.
  - b. **Eligibility:** Any intervention proposed by ATF members, including the airport operator, to be considered for funding must be evidenced, necessary, and fairly and reasonably related to the development. The ATF Steering Group will consider a proposed intervention against agreed criteria (to be defined by the ATF Steering Group upon their establishment). The ATF Steering Group must be satisfied that the interventions proposed for funding are likely to provide a positive impact on sustainable mode share and the **Surface Access Strategy [APP-228]** vision, objectives, and priority areas.
  - c. **Modal considerations:** There should be a reasonable balance between mode spending across the six surface access priority areas – (1) Luton DART and rail, (2) Managing vehicle access, parking, private hire vehicles and taxis, (3) Bus and coach, (4) Walking and cycling, (5) Highway interventions (excluding those covered by the TRIMMA that promote sustainable modes), and (6) Technology and communications.

## 2.5 Governance

- 2.5.1 Whilst the airport operator will collect the funds through parking levies, the ATF Steering Group, a sub-committee of the Airport Transport Forum (ATF), will administer the STF.
- 2.5.2 The ATF Steering Group will be chaired by the airport operator. The ATF Steering Group will have selected representation from the ATF, as proposed in Table 2.4.

Table 2.4: Proposed ATF and ATF Steering Group membership (one representative from each body)

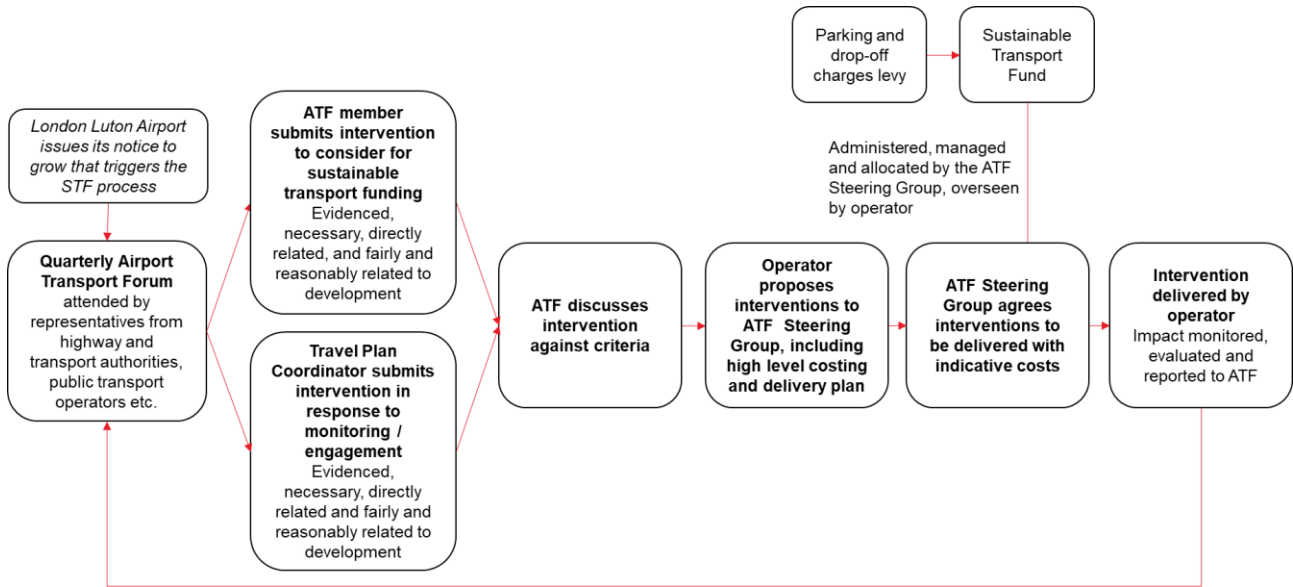
ATF membership	ATF Steering Group membership
The airport operator - who will chair the forum	National Highways
Local highway authorities and National Highways	Representatives from Central Bedfordshire Council, Hertfordshire County Council, Luton Borough Council, Buckinghamshire Council (Highways Authorities)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

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

2.5.4 The final Terms of Reference for the ATF Steering Group will be contained in the TRIMMA.

2.5.5 The STF decision-making process is set out in Figure 3.4 below.

Figure 2.4 STF decision-making process





## GLOSSARY AND ABBREVIATIONS

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

## APPENDIX A: FORECAST ANNUAL REVENUES

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

Year	Annual Sustainable Transport Levy			Accumulated Sustainable Transport Levy		
	Core Planning Case	Faster Growth	Slower Growth	Core Planning Case	Faster Growth	Slower Growth
2025	£1,189,138	£1,204,143	£1,128,258	£1,189,138	£1,204,143	£1,128,258
2026	£1,229,150	£1,274,164	£1,172,840	£2,418,288	£2,478,306	£2,301,098
2027	£1,274,164	£1,460,605	£1,201,211	£3,692,452	£3,938,912	£3,502,309
2028	£1,274,164	£1,460,605	£1,225,528	£4,966,616	£5,399,517	£4,727,837
2029	£1,274,164	£1,460,605	£1,253,899	£6,240,780	£6,860,123	£5,981,736
2030	£1,274,164	£1,460,605	£1,274,164	£7,514,944	£8,320,728	£7,255,900
2031	£1,274,164	£1,460,605	£1,274,164	£8,789,107	£9,781,334	£8,530,064
2032	£1,274,164	£1,460,605	£1,274,164	£10,063,271	£11,241,939	£9,804,228
2033	£1,274,164	£1,460,605	£1,274,164	£11,337,435	£12,702,545	£11,078,392
2034	£1,274,164	£1,460,605	£1,274,164	£12,611,599	£14,163,150	£12,352,555
2035	£1,274,164	£1,510,323	£1,274,164	£13,885,762	£15,673,473	£13,626,719
2036	£1,274,164	£1,560,041	£1,274,164	£15,159,926	£17,233,514	£14,900,883
2037	£1,548,606	£1,671,906	£1,317,554	£16,708,532	£18,905,421	£16,218,437
2038	£1,703,725	£1,870,777	£1,360,944	£18,412,257	£20,776,198	£17,579,381
2039	£1,870,777	£2,032,887	£1,404,334	£20,283,035	£22,809,084	£18,983,714
2040	£2,028,281	£2,215,259	£1,447,724	£22,311,316	£25,024,344	£20,431,439
2041	£2,175,285	£2,407,764	£1,512,809	£24,486,601	£27,432,108	£21,944,248
2042	£2,343,289	<b>£2,448,292</b>	£1,567,047	£26,829,890	<b>£29,880,400</b>	£23,511,294
2043	<b>£2,448,292</b>	£0	£1,632,132	<b>£29,278,181</b>	£29,880,400	£25,143,426
2044	£0	£0	£1,686,369	£29,278,181	£29,880,400	£26,829,796
2045	£0	£0	£1,751,455	£29,278,181	£29,880,400	£28,581,250
2046	£0	£0	£1,870,777	£29,278,181	£29,880,400	£30,452,027
2047	£0	£0	£2,078,682	£29,278,181	£29,880,400	£32,530,710
2048	£0	£0	£2,263,487	£29,278,181	£29,880,400	£34,794,197
2049	£0	£0	<b>£2,448,292</b>	£29,278,181	£29,880,400	<b>£37,242,488</b>