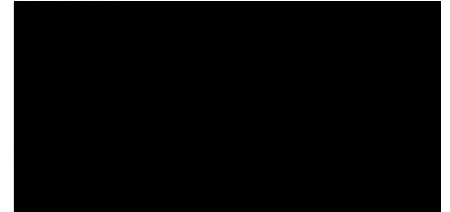


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**Comments on Behalf of Holiday Extras Ltd  
in Response to Any Further Information/Submissions  
Received by Deadline 7**

**PINS Ref No. TR020001**

**Deadline 8**

**Registration Identification No. 20039891**

**1.00 HOLIDAY EXTRAS LTD'S COMMENTS ON THE APPLICANT'S RESPONSE DUE BY DEADLINE 7 TO THE EXAMINING AUTHORITY'S WRITTEN QUESTIONS POSED ON 15<sup>TH</sup> DECEMBER 2023 ON PARKING PROVISION**

- 1.01 My clients have the following observations to make on the Applicant's response due by Deadline 7 to the Examining Authority's Written Questions posed on 15<sup>th</sup> December 2023.
- 1.02 On 15<sup>th</sup> December 2023, the Examining Authority posed the following questions of the Applicant relating to parking at TT.2.21 *"What are your proposals for monitoring the provision of off-site parking (supplied by third parties, including privately rented driveways)? How would you ensure if lower than anticipated provision of car parking occurs in the future it can be identified and mitigated before it causes any issues such as fly-parking?"*
- 1.03 Holiday Extras Ltd find the Applicant's response to the first question at TT.2.21 found at **Document REP7-061** to be ambiguous, in that it is said: *"In recognition that the market for off-site parking is likely to increase due to the Proposed Development, the Applicant has forecast an increase in off-site parking due to the proposed development; however, the Proposed Development does not necessarily require an increase in supply to cater for this forecast because alternative options (in particular via sustainable modes) will be available if there is insufficient supply. The Applicant is therefore not proposing to monitor the provision of off-site parking (either by third parties or in private driveways). The Applicant does not consider it would be appropriate, neither does it have the means to do so."*
- 1.04 The Applicant's response requires an understanding of those primary factors why passengers decide to access an airport by private car. In certain cases, there is no option, particularly where the passenger lives in a location which is not readily accessible to a conveniently located transport hub offering frequent bus/rail services, or where the passenger is physically impaired; whilst the Applicant's answer takes no account of those factors which underpin a passenger's reliance on using the private car, namely convenience, speed and cheapness, compared with alternative access modes. In certain cases, for example, families with young children, large amounts of luggage may be involved, whilst there are certain passengers who harbour genuine concerns surrounding the reliability of public transport services, for what may be their main holiday.
- 1.05 In considering the second component posed in the Examining Authority's Question 2.21, my clients accept the reasons provided by the Applicant as to why it is considered inappropriate not to monitor off-site car parking and car parking on private driveways,

given that trips involving long term off-airport car parking providers have been forecast for each assessment year and included in the modelling as background traffic. It is also understood that trips involving shuttle buses associated with the traditional park and ride off-airport car parking model are to be monitored as part of the TRIMMA data collected by the airport.

- 1.06 Holiday Extras Limited agree with the Applicant's answer to the second question to the extent that fly-parking is caused by the passenger being reluctant to pay for any form of parking provision. The Applicant recognising that that fly-parking, and parking on private driveways can result in inconvenience to residents and potential highway safety concerns, nevertheless imply that it is not their responsibility.
- 1.07 This means that where there is a need to mitigate fly-parking, the onus will be firmly placed on the particular local authority to fund and devote resources in preparing evidence to the Airport Transport Fund, in order to secure the necessary financial support through the TRIMMA. This process will involve a degree of uncertainty over whether the Airport Transport Fund Steering Group agrees to allocate Residual Impact Funding to mitigate the particular fly-parking problem, being dependent on the financial resources available as part of the Residual Impact Fund, irrespective of any thresholds agreed between highway authorities. It follows that at present a number of imponderables remain relating to the successful alleviation of future fly-parking, at a time when local authorities are having to confront challenging resource issues.
- 1.08 My clients do not accept the suggestion made by the Applicant in answer to the second element of Q2.21 that, if there is a shortfall in the supply of car parking, this would result in an increased propensity for passengers to use public transport. That opinion is devoid of any reasoned justification, and runs counter to those fundamental decisions why passengers rely on private cars to access London Luton Airport.
- 1.09 It is noted in the Applicant's response to Q2.21 that *"In the event that the overall supply of parking is considered to be insufficient, as a result of less off-site parking capacity coming forward than is assumed, the Applicant could consider the option of providing additional on-site parking and seeking planning approval to do so. However, for the reason set out above the Applicant does not see this as a solution to passengers choosing to fly-park. A shift of modes from private car to*

*sustainable travel is therefore preferable to increasing parking provision, and as such this would remain a key focus."*

1.10 The option of considering additional on-site parking reinforces the point raised on behalf of Holiday Extras Ltd in earlier representations, namely there is and remains a general reluctance on the part of the Applicant to enter into discussions with my client, to ensure that a shortfall in airport related car parking provision does not arise. The same option is required to be seen in the light of the fact that the Applicant considers it is not necessary for a contingency figure to be introduced to car parking supply. No indication is provided by the Applicant as to where any potential additional car parking may be provided, despite earlier detailed car parking appraisals having been carried out as part of the Alternatives in Design Evolution Chapter of the Environmental Statement. [Document AS-026]. The fact that the Applicant has felt it appropriate to suggest an option of providing additional on-site parking is the telling point.

## **2.00 HOLIDAY EXTRAS LTD'S COMMENTS ON RESPONSES TO THE BUS AND COACH STUDY AT DEADLINE 7**

2.01 The latest Draft version of the Section 106 Agreement is found at **Document REP7-074** with Clause 1.6 of Schedule 9 confirming that provided the first Travel Plan demonstrates a need for early funding in excess of the initial revenues of the Sustainable Transport Fund, it will make available such amount as demonstrated by the Travel Plan as being necessary up to £1million of pump priming funding no later than the first meeting of the Airport Transport Forum Steering Group. It has been accepted by all parties that the Applicant may upon request recoup from the Sustainable Transport Fund an amount equal to the pump priming funding contribution from the Sustainable Transport Fund revenues in other instalments and/or repayment period as agreed between the Applicant and LLAOL.

2.02 Whilst this additional pump priming fund is welcome, it has to be seen in the context of current knowledge surrounding improvements to bus and coach services to the airport. **Document REP7-043** confirms the bus and coach study [Document REP5-058] comprises undetailed potential services that may be included in future Travel Plans, with any intervention for sustainable transport funding being submitted to the Airport Transport Forum Steering Group following the "Notice to Grow". The potential coach services have been drawn from the Airport Operators Coach Market Study published in 2023 to

support the coach tender process, which is expected to be updated through five yearly reviews.

2.03 The bus and coach study does not seek to provide an exhaustive list and other interventions can be considered in the future, but no specific new/improved bus services have been committed as part of the Future Travel Plan, with the initial bus and coach study looking at possible new routes to improve accessibility to the airport.

2.04 It is therefore difficult to evaluate in the light of a number of unknown factors, the extent to which the £1million pump priming fund, along with any Sustainable Transport Fund provisions considered by the Airport Transport Fund Steering Group, will result in tangible improvements in public transport provision to the airport, especially in the short term.