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**Comments on Behalf of Holiday Extras Ltd
in Response to Any Further Information/Submissions
Received by Deadline 8**

PINS Ref No. TR020001

Deadline 9

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- 1.01 **Document REP8-038** comprises the Applicant's response to Deadline 7 submissions. Those representing Holiday Extras Ltd can find no effective response to the representations raised by my clients in **Document REP7-102**. To this end, the Applicants response to paragraph 3.05 set out on page 6 of my client's Deadline 7 submission [**Document REP7-102**], is simply to refer to the Deadline 5 submissions **Document REP6-053**. My clients are fully aware of the provisions of **Document REP6-053** in that it is directly referred by Holiday Extras limited in paragraph 3.05 of **Document REP7-102**.
- 1.02 The point raised in Deadline 7, and which remains unanswered in the Applicant's **Document REP8-038**, can only be repeated. The figure of 16,000 short, medium and long stay car parking spaces are to be provided at a throughput of 32mppa, having been derived from a baseline figure 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 any detailed way which enables either the Examining 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 remains decidedly vague, as was stated earlier in **Document REP7-102**, with **Document REP6-053** adding:
- "The 2019 parking provision reflects the accessibility of the airport, vehicle arrival and departure profile, car occupancy and duration of stay which effectively defines the total of car parking required. The profile has been used as proxy for the future year, with the growth in passengers supplied 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."*
- 1.03 It is perfectly reasonable for my clients to information on the precise methodology relied upon by Luton Rising used to define the 16,000 short, mid and long stay on-airport car parking spaces for the expanded airport as part of its DCO application. This is particularly the case given the Applicant's accepted need in the future for additional long term off-airport car parking provision. It is also perfectly legitimate question to ask in the light of comments raised by other interested parties on traffic generation generally arising from the DCO application, and the Applicant's response on questions posed by others on the monitoring long term of off-airport car parking provision.
- 1.04 It seems to my clients that there is a general reluctance on the part of the Applicant to provide detailed information to justify the 16,000 on-airport car parking spaces sought, which is important to those involved in the business of providing airport related car

parking, as well as to other interested parties. In the absence of a detailed response, it raises doubts on whether there is any detailed methodology which supports the on-airport car parking figures relied upon by the Applicant.

- 1.05 The same consideration applies to other aspects of Holiday Extras Ltd's representations found in **Document REP7-102**. In this regard, the Applicant simply refers to its response in ID13 to Deadline 6 submissions at **Document REP7-070** along with **Document REP7-061**, but fails to address the specific issues raised by my clients in their representations.
- 1.06 The situation becomes even worse on the question of third party operated car parking facilities. In my client's representations it is pointed out that the figures relied upon by the Applicant in **Document AS-123** are simply inaccurate where they relate to the same topic. The issues raised in my client's representations in **Document REP7-102** particularly from paragraph 3.15 on page 8 through to paragraph 3.28 on page 13 have simply not been grappled with.
- 1.07 This situation leaves the Examining Authority with a conundrum in that the provision of third party operated car parks has not in my client's view been properly assessed, is inaccurate, and does not reflect either the current provision or that in evidence at the earlier "*called-in*" inquiry concerning an increase in passenger throughput from 18mppa to 19mppa. It follows that doubts must be cast on the level of third party operated car parking facilities, which in turn poses the question on whether the expected additional off-site parking requirement through to 2043, outlined on page 33 of **Document REP6-065** in reply to the Examining Authority's Action Point 20, is soundly based, and will be sufficient in the future.