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**Comments on Behalf of Holiday Extras Ltd
in Response to Any Further Information/Submissions
Received by Deadline 10**

PINS Ref No. TR020001

Deadline 11

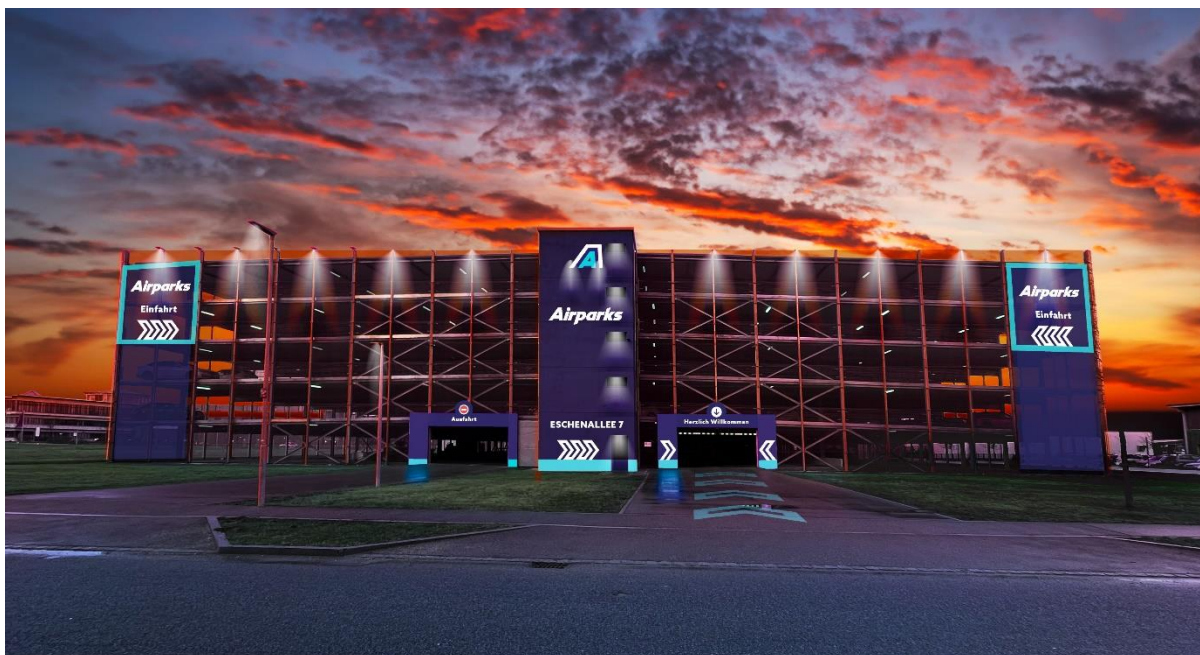
Registration Identification No. 20039891

- 1.01 Holiday Extras Ltd raised representations at the Deadline 9 stage (**Document REP9-079**) in reply to the Applicant's response set out in their Deadline 7 submissions at **Document REP7-102**. There has been no response from the Applicant at the Deadline 10 stage to the issues raised by my clients in **Document REP9-079**. The appropriate place in which to raise a response would have been the document entitled "*8.188 Applicant's Response to Deadline 9 Submissions*" [**Document REP10-045**].
- 1.02 This is not the first time the Applicant has failed to respond to representations raised by Holiday Extras Ltd in the current DCO Examination process. The Examining Authority were alerted by this practice in **Document REP5-070** to the fact that Luton Rising had failed to respond to my client's Deadline 3 stage representations in their Deadline 4 submission, necessitating an intervention by the Examining Authority to request a response to the representations raised by Holiday Extras Ltd in **Document REP3-118**.
- 1.03 The basis of my clients' representations in **Document REP9-079** was threefold. Firstly, the Applicant had simply referred to what was included in their Deadline 5 Submissions at **Document REP6-053**, of which my clients were fully aware, as it was referred to in their own submission at **Document REP7-102**. Secondly, the Applicant's response was decidedly vague as to how the calculations for on-airport passenger car parking provision over the duration of the DCO application had been calculated in a way which enables both the Examining Authority as well as interested parties to be fully cognisant of the processes involved, including being able to assess the selected methodology. Thirdly, the Applicant has simply not answered issues concerning third party operated car parking facilities, which my clients had pointed out were inaccurate as far as **Document AS-123** is concerned. In short, Luton Rising had simply not grappled with my client's representations raised in **Document REP7-102** where they related to paragraph 3.15 on page 8 through to paragraph 3.28 on page 13.
- 1.04 We have now arrived at a situation where the examination DCO process is rapidly coming to a finale, with primary matters raised by my clients in earlier representations on the subject of airport related car parking remaining for the most part unanswered, or absent of any detailed response. This has meant that an assessment of the Applicant's figures has not been possible, raising doubts over the veracity of the evidence on the same topic.

- 1.05 Airport related car parking is not considered to be a minor issue, having implications extending well beyond the boundaries of London Luton Airport. The examination process has revealed that airport related car parking is a major concern to local residents, surrounding Parish Councils and neighbouring Local Planning Authorities, particularly in respect of fly-parking in surrounding residential streets, and passengers using private driveways to park their cars taking advantage of technological platforms such as JustPark.
- 1.06 The Applicant has since February 2020 held no discussions with my clients on airport related car parking, either as part of earlier consultation exercises pending the submission of the DCO application, or at any time during the DCO application process. This is despite the Applicant having stated on record that Holiday Extras Ltd are *“clearly a really important partner at the airport”* with third party off-site parking providers expected to *“seize the opportunity provided by airport growth to provide for proportionately greater capacity of their own operation subject to separate planning applications.”*
- 1.07 That cannot be an appropriate stance for the airport operator to adopt, given that Holiday Extras Ltd are a supporter of the DCO application.
- 1.08 My clients are not a minor player in airport related car parking products and I have included overleaf for the Examining Authority’s information as well as for other interested parties, a press release demonstrating recent developments involving Airparks, a subsidiary of Holiday Extras Ltd, in Germany.

Holiday Extras Group expands to Munich Airport with new 1,900-space Airparks branded multi-storey

Munich Airport Airparks will welcome its first customer on the 1st of March. The £15m facility offers 1,900 spaces over five floors approximately ten minutes from Munich Airport, with LED lighting, lifts, customer lounge and family friendly facilities. Clean, smart shuttles run 24/7 to the terminal.



Artists impression of the new car park

Great news for Holiday Extras customers and partners. The Airparks site offers a secure space at a competitive price minutes from the airport. Further investment will be made in seamless entry and exit, branding and security.

This new site takes the total Airparks spaces in Germany to 7,400 Frankfurt and Stuttgart with 2,700 spaces and licensed operations in Berlin, Dusseldorf, Cologne, Hanover, Memmingen, Paderborn and Bremen with 2,700 spaces. Expansion also continues in the UK, where Airparks opened new sites in Aberdeen in 2022 and Birmingham in 2023.

The investment in Munich Airparks Parkhaus follows just weeks after Holiday Extras announced its [investment in Dutch airport transfers business Transferz](#). Matthew Pack, Group CEO of Holiday Extras, said,

"Munich Airparks Parkhaus, launched in January, instantly became our most sought-after offering at the airport. It embodies the Airparks ethos of exceptional value, secure parking, and world-class customer service. Our choice of Munich for our latest European venture is twofold: it's not only Germany's second-largest airport, serving 37 million passengers in 2023, but the forthcoming S-Bahn connection in 2025 will link the car park directly with the terminals. As Munich hosts our German office, this expansion in our second home is particularly close to our hearts."