

Our Ref: TFN/emn/14b/98

Yr Ref:

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BY E-MAIL ONLY

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Dear Sirs

**Re: Representation on LBC Application Reference No. 21/00031/VARCON
PINS Ref No. APP/B0230/V/22/3296455**

Introduction

This consultation response is raised on behalf of my client, Holiday Extras Ltd, a leading UK distributor of on-and off-airport related car parking spaces. My client sells a range of holiday related products in addition to airport related car parking, including airport hotels, airport lounges, travel insurance and car hire. These products are sold directly to customers on their database which extends to approximately 6 million UK homes, as well as to a wide range of business partnerships and other travel related organisations.

Holiday Extras Ltd support with reservations the Section 73 application seeking a variation of Conditions 8 (passenger throughput cap), 10 (noise contours), 22 (car parking management), 24 (travel plan), and 28 (approved plans and documents) to planning permission Reference No. 15/00950/VARCON dated 13th October 2017 to accommodate 19mppa and to amend the day and night noise contours at London Luton Airport [LPA Ref. No. 21/00031/VARCON and PINS Ref No. APP/B0230/V/22/3296455].

It is contended there are a number of deficiencies with regard to the current application Reference No. 21/00031/VARCON, particularly where it concerns the submitted planning statement, transport statement and accompanying car parking management plan, including related chapters in the Environmental Statement and their Addendums. These representations elaborate on these shortfalls, being specifically directed at the topic of airport surface access and future long term airport related car parking demand and supply.

The Secretary of State in his letter of 6th April 2022 directing that the application be referred to him, set out matters which he particularly wished to be informed about for the purposes of consideration of the application, which comprised the following:

- “a) The extent to which the proposed development is consistent with Government policies for meeting the challenge of climate change, flooding and coastal change (NPPF Chapter 14);*



- b) *The extent to which the proposed development is consistent with Government policies for conserving and enhancing the natural environment (NPPF Chapter 15);*
- c) *The extent to which the proposed development is consistent with the development plan for the area; and*
- d) *any other matters the Inspector consider relevant."*

My client would respectfully request that the Inspector(s) consider under paragraph d) airport surface access and future long term airport related car parking demand and supply, as the same topic is relevant in the context of the proposed development.

Current Issues Concerning Climate Change

The issue of climate change in terms of airport expansion was considered in a recent appeal decision concerning various improvements to airport infrastructure to allow for a throughput of 43mppa in a 12 month calendar period at London Stansted Airport in Essex. In the Panel of Inspectors' decision letter dated 26th May 2021 (PINS Ref. No. APP/C1570/W/20/3256619), paragraphs 18 and 19 stated:-

"18. The in-principle support for making best use of existing runways provided by MBU is a recent expression of policy by the government. It is given in full knowledge of UK commitments to combat climate change, having been published long after the Climate Change Act 2008 (CCA) and after the International Paris Agreement. It thoroughly tests the potential implications of the policy in climate change terms, specifically carbon emissions. To ensure that Government policy is compatible with the UK's climate change commitments the Department for Transport (DfT) aviation model was used to look at the impact of allowing all MBU airports to make best use of their existing runway capacity. This methodology appears to represent a robust approach to the modelling.

19. International aviation emissions are not currently included within UK carbon budgets and are instead accounted for through 'headroom' in the budgets, with a planning assumption for aviation emissions of 37.5Mt of CO₂. Whilst the Government has recently announced that international aviation will expressly form part of the sixth Carbon Budget, its budget value has not yet been defined."

In a subsequent judicial review challenge (Regina on the application of Uttlesford DC v Secretary of State for Housing Communities and Local Government; Stansted Airport Ltd; Stop Stansted Expansion; North Somerset Council; Bristol Airport Action Network Committee Coordinator and Group for Action on Leeds Bradford Airport CO/2356/2021), the Claimant Uttlesford District Council submitted that the Panel in deciding the London Stansted Airport development to cater for a throughput of 43mppa over a 12 month calendar period, failed to have regard to relevant policy developments in relation to climate change and carbon emissions, and/or the limitations and reservations in national aviation policy.

In the resultant High Court decision, Mrs Justice Lang DBE considered that this submission was unarguable. The Judge stated:



“On a fair reading of the Decision Letter (DL), the Panel correctly identified and understood the relevant national and local policies. It was correct to find that carbon emissions policies are addressed at a national level, in the MBU, and are not a matter for local planning decision-makers. It was entitled to conclude that the national policy “Making best use of existing runways” (“MBU”), published in June 2018, was made in full knowledge of the UK’s then commitments to combat climate change, and that it thoroughly tested the potential implications of the policy in climate change terms (DL 18). It was also entitled to conclude that the Government has not altered the policies in the MBU, notwithstanding changes to targets for reduction of greenhouse gas emissions (DL 24-25).”

The comments raised by Mrs Justice Lang DBE in the High Court upholding the Panel of Inspectors’ decision to grant planning permission for an expansion at London Stansted Airport up to 43mppa, represent important material considerations in respect of the current “called-in” application, especially as they represent the most up-to-date position governing issues of climate change, carbon emissions, and limitations and reservations where they concern national aviation policy.

Discrepancies in Future Passenger Forecasting

The Statement of Case prepared on behalf of Luton Borough Council states at paragraph 7.4 *“The forecasts and published statements of Luton Rising (the Airport Owner) submitted in the DCO process which is on-going, will be commented upon in evidence.”*

In a similar way, the comments set out in this correspondence are required to be considered alongside earlier representations raised by Holiday Extras Ltd to the statutory Pre-Application Consultation Exercise carried out between 8th February to 4th April 2022 entitled *“Future LuToN – Making Best Use of Our Existing Runway”*, with its underlying intention to build a new terminal and new infrastructure to increase the capacity of the airport, in terms of the number of flights and passengers it can handle, from 18mppa to 32mppa. It is noted that Luton Rising will be commenting on forecasts and published statements concerning its own DCO application.

Table 2.3 *“Annual Passenger Forecasts from 2014 Planning Permission Vs Latest Updated Actual and Forecasts”* is referred to in the Environmental Impact Assessment Volume 2: Environmental Statement Addendum July 2022. If the figures set out in Table 2.3 represent the latest passenger throughput forecasts provided by London Luton Operations Limited, it would suggest that supporting material to the Pre-Application Consultation Exercise *“Future LuToN – Making Best use of Our Existing Runway”* concerning the forthcoming DCO application, involving an expansion of London Luton Airport from 28mppa to 32 mppa, have materially changed.

This is despite the fact that the public consultation exercise into the *“Future LuToN – Making Best use of Our Existing Runway”* took place as recently as February/April of this year, in which different passenger forecasts were anticipated, particularly where it concerns future on-airport passenger parking.

In this regard, the contents of Table 2.3 *“Annual Passenger Forecasts from 2014 Planning Permission Vs Latest Updated Actual and Forecasts”* referred to in the Environment Impact Assessment Volume 2: Environmental Statement Addendum July 2022 reveal an updated forecast of passenger throughput from 2025 through to 2031 to be 19mppa.



This figure does not sit comfortably with the future distribution of on-airport passenger car parking at Phase 1, commensurate with a construction date in the first quarter of 2025 and an operational date of the second quarter of 2027, at which time a throughput of 21.5mppa is envisaged. It is in 2027 that a total of 11,425 car parking spaces are expected to be available to meet the operational needs of the airport, of which a total of 1,335 mid stay car parking spaces and 2,225 long stay car parking spaces, along with other car parking products, are expected to be sited on new Car Parks P6 and P7 located outside the Operational Area Boundary of the airport.

Key Deficiencies Associated with Application No. 21/00031/VARCON

The principal deficiency surrounding the current Section 73 application which transgresses all the supporting material, is the complete absence of any consideration given to the contribution made by long term off-airport car parking operators to surface access provision to London Luton Airport, including future long term airport related car parking demand and supply.

No attention at all has been paid to long term off-airport car parking operators such as my client who, through their subsidiary company Airparks Services Ltd, is well established, having operated continuously for a period well in excess of 20 years from their current site at Slip End, providing passengers with airport related car parking services.

This omission is surprising in the light of the fact that the Council's records will reveal that during the period from mid November 2019 through to the end of November 2020, Holiday Extras Limited was involved in discussions with representatives of LLAL to provide a new satellite long term off-airport car parking facility to be run jointly with my client to meet the needs of airport passengers as part of a future DCO application. Unfortunately, LLAL decided they did not wish to progress this proposal, for reasons which at the time, seemed to be primarily related to climate change considerations.

No approaches have been made by Luton Rising or its consultants, to Holiday Extras Ltd, Airparks Services Ltd, or their advisers concerning the contribution made by long term off-airport car parking sites as part of Application No. 21/00031/VARCON.

The absence of any proper consideration in the current Section 73 application to the contribution made by companies such as Airparks Services Ltd, becomes even more significant following their acquisition of Paige Parking, who previously operated from land immediately adjoining my client's site at Slip End. A combined total of 4,890 long term off-airport car parking spaces are currently available on both sites which enjoy the benefit of planning permission.

The figure of 4,890 long term off-airport car parking spaces represents 57% of all existing on-airport passenger car parking provision in 2022, if reliance is placed on the total figure of 8,516 on-airport passenger car parking spaces as set out in paragraph 10.5.5 of the Environmental Impact Assessment Volume 2: Environmental Statement Addendum of January 2021. Alternatively, the same figure of 4,890 long term off-airport car parking spaces equates to 54% of the total figure of 9,055 existing on-airport passenger car parking spaces in Table 5.2 of the Transport Statement of December 2020.



Similarly, the figure of 4,890 long term off-airport car parking spaces provided by my client at Slip End is equal to 49% of the total existing on-airport passenger car parking spaces of 9,900, post opening of the Luton DART, as set out in Table 3-1: Existing and Proposed Car Parking Provision, taken from the document entitled “*Getting to and from the Airport – Emerging Transport Strategy*” forming part of the Pre-Application Consultation Exercise “*Future LuToN – Making Use of our Existing Runway*”.

Whichever figure for total on-airport passenger car parking Luton Rising wishes to prioritise, the number of long term off-airport car parking spaces operated by my client at Slip End represents a significant supply of airport related passenger car parking provision which will continue both now and into the future, and which needs to be properly considered when assessing road access, along with future on-airport related car parking demand. To simply ignore this significant component of existing airport related car parking, casts doubt on the conclusions reached on transport issues and surface access provision generally in the current Section 73 application.

An important attributable of long term off-airport car parking companies such as Airparks Services Limited, operating from lawful sites in the vicinity of London Luton Airport, extends beyond issues of demand and supply. They provide a welcome choice for passengers, where otherwise there would be an absence of competition in the market for airport related car parking, left to be dominated by the airport company. In this respect, planning decisions should not seek to inhibit competition. The importance of this issue becomes apparent from the document produced by the Civil Aviation Authority CAP 1473 entitled “*Review of Market Conditions for Surface Access at UK Airports – Final Report*” published in 2016, paragraph 4.9 of which is of note:

“4.9 Under such a market definition, it follows that airport operators generally are present in both the upstream (access to the airport) and downstream (services to get to the airport) levels of the surface access sector. As such, the airport operator provides third parties access to facilities that are necessary for them to supply surface access services to passengers, whilst at the same time competing with those third parties in the downstream market. This may mean that airport operators have incentives to favour their own services when granting access to facilities needed by their rivals. ”

It is contended that were the 4,890 long term off-airport car parking spaces not available at Slip End, a severe problem would arise in respect of the current Section 73 proposals, in that Luton Rising would not be able to justify the contention now being made, namely, that there is no need for further infrastructure on-airport, and in particular additional on-airport passenger car parking, as part of its proposals to increase passenger throughput to 19mppa by 2025.

In the event that Airparks Services Ltd’s facilities were not available in providing for an important segment of airport passenger car parking; the airport would have to give serious consideration to extending its boundaries onto land to the east, commensurate with the location where the future distribution of passenger on-airport car parking comprising Phase 1 of the forthcoming DCO application is expected to be provided in the second quarter of 2027, at a throughput of 21.5mppa is anticipated. This is a matter evident from the supporting statements to the Pre-Application Consultation Exercise “*Future LuToN – Making Use of Our Existing Runway*”.



Any expansion of airport related car parking into this location would at the present time, be in contravention of “*development plan*” Policy LLP6C, in that it would involve airport related car parking being situated outside the Airport Strategic Allocation as shown on the Proposals Map on land at Century Park and Wigmore Valley Park. These two areas are specifically excluded from being used for airport related parking purposes in the same “*development plan*” policy.

On-Airport Passenger Car Parking Provision

The above considerations are required to be assessed alongside the contents of paragraph 7.32 of the Statement of Case prepared on behalf of Luton Borough Council:

“7.32 The provision of available car parking at the airport is below that which was envisaged within the 2012 application and the rapid growth of the airport has resulted in a greater under provision of available spaces. Alongside an established Car Parking Management Plan, which restricts availability and establishes the cost of vehicular entry to the airport, this has motivated the increased use of sustainable modes of transport. The Car Parking Management Strategy submitted with the application continues this approach, with the ASAS and the Travel Plan providing targets that will be monitored to assess effectiveness.”

I have set out overleaf Table 1, which examines existing and proposed airport related passenger car parking provision, with two sets of figures provided for existing on-airport car parking spaces at 2022. These circumstances reflect the variation in figures in the supporting material to Application No. 21/00031/VARCON.

Table 1 endorses the comment made in paragraph 7.32 of the Statement of Case prepared on behalf of the Local Planning Authority. The provision of on-airport passenger car parking at a throughput of 19mppa, expected to be reached in 2025, is below that anticipated to service a passenger throughput of 17.8 mppa anticipated in 2028 at the time of 2012 application. This is despite London Luton Airport having experienced a growth in passenger numbers of 8.6m between 2012 and 2019.

It is only when on-airport passenger throughput is expected to reach 21.5mppa in accordance with the forthcoming DCO application, that on-airport passenger car parking will exceed the figure originally set out in the design and access statement accompanying Application No. 12/01400/FUL, required to support a passenger throughput of 17.8 mppa.

The number of existing on-airport passenger car parking spaces in 2022 set out in column 3 of Table 1 is not expected to change at a passenger throughput of 19mppa, given that Luton Rising do not anticipate any further on-airport passenger car parking provision to satisfy this throughput figure. As a result, a range between 1,525 and 2,370 on-airport passenger car parking spaces are expected to meet a future increased passenger throughput of 2.5m, between 2025 when a throughput of 19mppa is anticipated, and 2027 when an anticipated throughput of 21.5mppa is forecast, in



TABLE 1
Existing and Proposed Airport Related Passenger Car Parking Provision

Category of Car Park	Proposed On-Airport Parking Spaces 2028 (1)	Post completion of MPT and MSCP2 (2)	Existing On-Airport Parking Spaces 2022 (3)		On-Airport Parking Space requirement at 21.5mppa (4)	On-Airport Parking Space requirement at 27mppa (5)	On-Airport Parking Space requirement at 32mppa (6)
Short-Term	3,700	3,674+	3,700	3,623	4,150	4,800	5,800
Mid-Term	2,513	1,668^	2,350 (1700 post-Luton DART Opening)	1,281	2,600	3,000	3,650
Long-Term	4,496*	4,205<	4,500	4,151	4,675	5,400	6,550
TOTAL	10,709	9,547	9,900 (post Luton DART Opening)	9,055	11,425	13,200	16,000

Source:

- (1) Table 5.1 Airport Passenger Car Parking – Design and Access Statement Planning Application No. 12/1400/FUL November 2012 page 24.
- (2) Figure 2.2: Existing & Proposed Car Parking Provision in Surface Access Strategy Report October 2019 “*Future LuToN: Making Best Use of Our Runway*”, updated to take into consideration the contents of a letter dated 18 December 2017 from Arup to Luton BC concerning Application No. 17/00004/GPDOPD relating to MSCP2.
- (3) Table 3-1: Existing & Proposed Car Park Provision taken from SAETS “*Getting to and from the Airport – Our Emerging Transport Strategy*” and Table 5.2 of the Transport Assessment forming part of Application No. 21/00031/VARCON
- (4) Table 4.1: Proposed Car Parking Provision - Consultation Brochure “*Future LuToN Making Best Use of Our Existing Runway*” and Table 3-1: Existing & Proposed Car Park Provision taken from SAETS “*Getting to and from the Airport – Our Emerging Transport Strategy*”.
- (5) Table 4.1: Proposed Car Parking Provision - Consultation Brochure “*Future LuToN Making Best Use of Our Existing Runway*” and Table 3-1: Existing & Proposed Car Park Provision taken from SAETS “*Getting to and from the Airport – Our Emerging Transport Strategy*”.
- (6) Table 4.1: Proposed Car Parking Provision - Consultation Brochure “*Future LuToN Making Best Use of Our Existing Runway*” and Table 3-1: Existing & Proposed Car Park Provision taken from SAETS “*Getting to and from the Airport – Our Emerging Transport Strategy*”.

* These figures include 1137 future long term on-airport car parking spaces.

+ The figure of 3,674 comprises short stay multi storey on-airport spaces. 1699 spaces are found in MSCP1 being an over-provision of 199 spaces compared with the figure of 1500 spaces set out in that part of the hybrid application 12/01400/FUL granting outline planning permission for the same multi storey car park, + 1975 spaces attributable to MSCP2. It takes into account the permanent loss of 892 spaces lost from the short term car park due to the construction of the MPT or DART and relocation of the DOZ, with the area used for car hire purposes following completion of MSCP2.

^ The figure of 1668 takes into account the permanent loss of 791 spaces from the mid term car park as a consequence of the MPT or DART, and the temporary loss of 219 spaces from the mid term car park at different stages due to construction works relating to the MPT or DART.

< The figure of 4,205 spaces is taken from the letter dated 18 December 2017 from Arup to Luton BC concerning MSCP2 the subject of Application No.17/0004/GPDOPD. The figure of 4,205 is 295 spaces less than that shown in Figure 2.2 of Existing & Proposed Car Parking Provision in Surface Access Strategy Report October 2019 “*Future LuToN: Making best use of our runway*”. It nevertheless coincides with the figure of 4,200 spaces set out on page 86 of the document “*Future LuToN – Making best use of our runway “Guide to Statutory Consultation*” which is said to comprise current long stay car park provision, 3,500 spaces of which will need to be accommodated in a temporary car park on Century Park site as part of preparatory works.



accordance with the supporting information forming part of the recent Pre-Application Consultation Exercise into the forthcoming DCO application.¹

The primary driver of parking demand at an airport is total passenger volume. There is no indication of how the key modelling input in calculating the number of on-airport car parking spaces required at London Luton Airport at a passenger throughput of 19mpps has considered the occupancy/demand ratio, being the number of cars wishing to park at London Luton Airport, and the volume of spaces required to service that demand on a monthly basis.

The Environmental Impact Assessment Volume 2: Environmental Impact Addendum January 2021 states that the forecast 2024 traffic volumes resulting from the increase in passenger numbers were estimated, based on actual (2019) and forecast (2024) aircraft schedules. These estimates show a worst-case minor increase in traffic flows of 3.7% in the AM peak and 3.2% in the PM peak between the 2019 18mppa and 2024 19mppa scenarios. It is unclear whether these figures have taken into account traffic flows associated with the courtesy bus service operated by Airparks Services Ltd.

Disputed Considerations Surrounding Car Parking Demand Forecasts

The submitted Transport Assessment accepts that the provision of on-airport passenger car parking is limited, compared with the daily passenger population at the airport. In order to overcome any negative influences, paragraph 10.4 of the submitted Transport Assessment states:

“The limited car parking capacity naturally encourages passengers to travel by public transport. The car parks are priced to encourage passengers to travel by public transport. It would often be more affordable for passengers to travel by public transport than by car and parking at the airport.”

These comments are anecdotal, unsupported by any evidence, and are required to be seen in the context of various information sources, particularly the objectives of the current Airport Surface Access Strategy (ASAS) 2018-2022 2019 Reissue, being:-

- i) to promote and encourage sustainable surface transport options for employees and passengers; and
- ii) to reduce the impact of surface access to the airport on the local community.

Representations raised by local residents, specifically where they concern car parking and surface access considerations should be noted, having been summarised in the submitted Planning Statement at paragraph 1.3.10:-

“Car Parking - Comments were received that considered that existing car parking measures at the airport were not effective. The cost of parking was too expensive, and that airport users parking in local villages has negative effect.

¹ 11,425 on-airport passenger car parking spaces at a passenger throughput of 21.5mppa [column 4 Table 1] minus 9,900 or 9,055 on-airport car parking spaces [column 3 in Table 1] as at 2022. No additional on-airport passenger car parking spaces are envisaged by Luton Rising between 2022, and a throughput of 19mppa in 2025.



Others raised requests for changes to the drop off and waiting areas and for alternative parking facility such as park and ride.

***Surface Access** – Comments included that the Proposed Amendment would increase the amount of traffic in the area, causing increased delays and pollution. Concerns were also raised that local infrastructure cannot cope with an increase in passengers and traffic and that there will be additional strain on transport links. Others called for improvements to public transport and that taxi services and driving should be discouraged. Others commented that the measures set out in the Transport Plan are too aspirational.”*

The response from those acting on behalf of Luton Rising to the key matters of car parking and surface access is found at paragraph 1.3.11 of the Planning Statement:-

*“**Car Parking** - As part of the development of the Masterplan, an assessment has been undertaken to consider the future requirements for car parking at the airport. The assessment shows that the existing parking facilities are sufficient to accommodate the increase to 19mppa, given continued investment to sustainable modes. The Car Park Management Plan sets out details of how the existing parking facilities will be managed to accommodate 19mppa included at Appendix B in the submitted Transport Assessment.*

***Surface Access** – As part of the development proposals an assessment has been undertaken to consider the transport effects associated with an increase in passenger numbers to 19mppa. The Transport Assessment and Travel Plan which are submitted alongside this application confirm that the increase in passenger numbers can occur without causing any significant negative impacts in terms of the capacity of the existing transport network. The opening of the Luton DART in 2021 will support further shifts to public transport mode share.”*

The statement made that existing car parking facilities are sufficient to accommodate an increase to 19mppa fails to take account of the rapid growth in the airport in terms of passenger numbers which has resulted in a greater under-provision of available on-airport passenger car parking spaces than originally anticipated, as demonstrated in Table 1 and the related commentary above. No reasons are advanced by Luton Rising to suggest that the pre Covid-19 pandemic growth in passenger throughput will not resume in the foreseeable future.

The suggestion made by local residents that alternative parking facilities such as a strategic park and ride should be explored, has not been further considered by Luton Rising, even though a similar exercise was carried out as part of a recent assessment of airport related car parking provision associated with a 2mppa increase in passenger throughput at Bristol International Airport.

The response received from Luton Rising to issues raised by residents on surface access, namely that the increase in passengers to 19mppa can occur, without causing any significant negative impacts in terms of capacity on the existing transport network, is only a partial solution. The Transport Assessment does not ensure that vehicle movements and impacts on the surrounding highway network are “*minimised*”, in order to ensure compliance with the two principal objectives of the current ASAS referred to above.



The response from those advising Luton Rising does not seek to curtail the least sustainable modes of travel to London Luton Airport, neither have any measures been put in place to alleviate indiscriminate parking in neighbouring residential streets, which has been a source of complaints from residents living near the airport. With no additional passenger car parking proposed on-airport to meet the 19mppa throughput; increased incidents of indiscriminate parking on surrounding residential streets, and the perpetuation of the least sustainable modes of access to the airport, is more likely to result, than if reliance is placed, for example, on an additional supply (in the form of a “headroom” or “monitor and manage” approach) provided on suitably located off-airport car parking sites.

With these considerations in mind, mention should be made of Application No. 06/00081/COU granted a one year temporary planning permission in respect of a change of use of an industrial building (previously Classes B1, B2 and B8) to a mixed office and airport related car parking operation on land at the Former Mondi Packaging Building, Airport Way, Luton, Bedfordshire. The reason given by the LPA in the Case Officer’s Report to the Council’s Development Control Committee meeting held on 15th March 2006 for granting a one year temporary period permission, arose as a direct consequence of a loss of 467 existing passenger car parking spaces on-airport, due to the construction of the East Luton Corridor road scheme.

There is no reason why, in circumstances where unintended consequences in terms of, for example, increases in indiscriminate car parking on neighbouring residential streets, or where the least sustainable modes of access to the airport are seen to pose a problem; consideration should not be given to granting a temporary period permission for airport related car parking on a suitably located site, as part of an overall monitor and manage approach to airport related passenger car parking provision.

My client considers that the Car Parking Management Plan attached at Appendix B to the Transport Assessment is not sufficient to discourage the least sustainable mode of transport to the airport, namely “kiss-and-fly”², as part of the current proposals to increase passenger throughput at the airport to 19mppa in 2025. Aside from a specified drop-off zone, the availability of free car parking in the mid-stay car park for a period of up to 15 minutes, and a 60-minute car parking free period in the long stay car park, followed by periods of up to 2 hrs being charged at £4.50, are not considered to be sufficient disincentives to alleviate those relying on the “kiss-and-fly” mode, at the same time encouraging passengers to use public transport. The “kiss-and-fly” mode is also required to be examined in the context of an absence of parking restrictions in neighbouring streets close to the airport.

The response from Luton Rising is that their Car Parking Management Plan will encourage public transport usage through pricing and limiting on-airport passenger car parking provision. It is the operator of the on-airport car parking which sets the price in the drop-off zone and car parks, with car parking revenue representing a significant revenue stream for the airport. Notwithstanding these points, it is important to consider earlier research undertaken in 2004 and 2005 on the impact of “kiss-and-fly”

² “Kiss-and-fly” is where the passenger is driven to the airport by a friend or relative, and then dropped off, with the friend or relative returning to his/her home or business, with the reverse occurring following the return of the passenger to the airport.



as a mode of access to Leeds-Bradford International Airport, studied by Dr Greg Marsden of the Institute of Transport Studies at Leeds University. To the writer's knowledge, there has been no updated research on this specific topic.

The results of his studies found that over 40% of passengers were dropped off at the airport by friends, involving a 36% increase in terms of total distance travelled to the same airport over and above that which would have resulted if passengers had driven and parked themselves. He calculated that the 36% increase in travel distance equated to an additional 19.4 million kilometres. The figure of 40% of passengers being dropped off at the airport by friends in Dr Greg Marsden's study at Leeds Bradford International Airport is not dissimilar from the 45% of passengers who were dropped off at London Luton Airport in 2019.

Dr Greg Marsden's research concluded that restricting parking spaces and raising charges at the same airport was only likely to have a marginal effect on modal split, and if anything, adopting this strategy was likely to have a potentially significantly negative impact through additional miles travelled, as a consequence of people accessing the airport by the "kiss-and-fly" mode. He concluded that far greater benefits were likely to accrue to the environment, congestion and safety, if the double journeys generated by "kiss-and-fly" could be reduced, than could otherwise be made from small modal shifts to public transport usage, however desirable that may be.

Similarly, no attention has been focussed in the Transport Assessment on the increasing impact of a number of technological platforms such as JustPark, which match drivers with car parking spaces through their websites and apps, representing what has been referred to as the "sharing economy", in the same way as historically AirBnB helps people share their houses with holiday makers, or Uber and Lyft have allowed drivers to share their cars with passengers. This mode of access results in similar disadvantages in terms of parking stress on neighbouring residential streets. It is inappropriate in my client's view for the Luton Rising to expect the local planning authority to police indiscriminate car parking on neighbouring residential streets, as the problem arises directly from activities taking place on the airport.

The objective of increasing public transport use to the airport cannot be viewed independently from recommendations regarding emissions, set out in Chapter 6 of Luton Borough Council Climate Action Plan Support document published in January 2020, whose aim is to provide an evidence base to inform the Council's Climate Action Plan.

Three of the recommendations in Chapter 6 are pertinent in a consideration of the importance to be attached to existing lawful long term off-airport car parking sites/strategic park and ride facilities, as part of an examination of airport related car parking and surface access provision forming part of Application No. 21/00031/VARCON.

- *The majority of flights taken from Luton Airport are for leisure rather than business, suggesting that the council could look at engaging with leisure travel passengers to consider alternative low carbon options. The Citizen's Assembly could provide a good forum for engagement with the public on this topic to help highlight the impact of aviation.*



- *There is a significant contribution to emissions as a result of transport to and from the airport. This will be a key opportunity for Luton Borough Council to influence activities of Luton Airport passengers. It is anticipated that the opening of the Luton Direct Air Rail Transit (DART) will help to reduce the number of passengers arriving and leaving the airport by private vehicle, however a strong community engagement plan will be needed to support this to encourage more uptake of public transport by airport staff and passengers.*
- *67% of Luton Airport passengers arrive at the airport in private vehicles. In order to reduce emissions from surface transport, it will be imperative that passengers have access to affordable, regular public transport options to shift away from current high levels of private vehicle use. Infrastructure capacity improvements to support the growth in electric vehicles will also be a key enabler for emissions reduction.*

Access to a courtesy bus service provided by my clients, as part of a traditional long term off-airport car parking business is clearly important in reducing vehicle emissions and congestion on the local highway network, in that it effectively reduces the possibility of passengers, whether individuals or families, driving to the airport, or relying on “kiss-and-fly”. My client replaced their fleet of 5 x King Long 55 capacity buses in 2019, a procedure which takes place every 4 years, whilst all their current fleet of vehicles are compliant with Euro 6 emission levels.

A low cost long term off-airport car parking facility, based on the traditional park and ride model as provided by my clients on land at Slip End, is well suited to those leisure passengers dependent on services provided by low-cost carriers, allowing the airport to make full use of the accepted limitation of on-airport passenger car parking capacity, at the same time reducing the numbers of passengers arriving and departing the airport by private car.

Passenger Modal Split Considerations

Table 4.2 taken from the consultation brochure entitled “Future LuToN – Making Best Use of our Existing Runway” is entitled “Proposed Changes to Modal Share for Passenger Travel” and considers modal split at various passenger throughput levels extending from 18mppa in 2019 to a forecast throughput of 32mppa in 2040. Table 4.2 is reproduced below.

Passenger Mode of Travel to Airport (expressed as percentages)	18.0 mppa	21.5 mppa	27.0 mppa	32.0 mppa
Bus/Coach	16.86%	17.00%	18.20%	18.20%
Rail/MPT (includes MPT from 2020)	20.72%	23.00%	26.80%	26.80%
Taxi/Minicab	17.94%	17.00%	15.50%	15.50%
Walk/Cycle	0.17%	0.20%	0.20%	0.20%
Private Car (Drop Off/Pick Up)	26.75%	26.00%	23.50%	23.50%
Private Car (On Site Car Park)	9.82%	9.50%	8.70%	8.70%
Private Car (Off Site Car Park)	5.80%	5.20%	5.00%	5.00%
Rental Car	1.88%	2.00%	2.00%	2.00%
Other	0.06%	0.10%	0.10%	0.10%
Total:	100.00%	100.00%	100.00%	100.00%
Public Transport Mode Share:	37.58%	40.00%	45.00%	45.00%
Private Car (Inc. rental cars), Taxi/ Minicab:	62.19%	59.70%	54.70%	54.70%
Walk/Cycle, Other:	0.23%	0.30%	0.30%	0.30%



It can be seen from Table 4.2 above, which formed part of the public consultation exercise carried out between 8th February and 4th April of this year as part of the forthcoming DCO application, that the percentage of passengers relying on public transport mode share is expected to increase from 37.58% in 2019 at a throughput of 18mppa, to 40.00% anticipated in 2027 at a throughput of 21.5mppa. During the same time period private car mode share which includes rental cars/taxi/minicab decreases from 62.19% to 59.70%; although this mode still represents a 19.70% increase over and above public transport mode share in 2027. Of particular concern are figures relating to the least sustainable modes of access to the airport, being taxi/minicab and private car (drop-off/pick up), which at a throughput of 21.5mppa will still account for 43% of modal share of passengers accessing the airport, despite the Luton DART being fully operational.

A comparison of Table 4.2 with Table 8.4 “*Travel Plan Targets*” for 2025 taken from the Environmental Impact Assessment Volume 2: Environmental Statement Addendum of July 2022 reveals that in assessing the latter, they are not considered to be particularly challenging.

Retaining a travel plan target in 2025 which is no different from the performance target figure in 2019 where it relates to reducing passenger single-occupancy non-electric private car travel, and increased passenger travel by bus and coach, with only a 4% increase expected in terms of passenger travel by sustainable modes of transport between 2019 and 2025; has to be seen in context. Airport passengers will still rely overwhelmingly on private cars to access the airport in 2025, a process which will continue through to 2027 and beyond, including the least sustainable modes of access to the airport; with little significant reduction in taxi/minicabs and private car/drop off/pick up modes. It is during the time period from 2019 to 2036 that the sale of new petrol and diesel cars and vans is expected to end, with the same vehicles expected to be zero emissions at the tailpiece in 2035.

These figures point to a shift in emphasis being required concerning passenger access to London Luton Airport, from one where attention is almost exclusively concentrated on improving public transport provision, to a more balanced approach of i) ensuring that sufficient on-airport passenger car parking provision is available, whilst focusing on reducing the least sustainable modes of access; ii) alleviating congestion on the local highway network, and (iii) preventing indiscriminate parking on neighbouring residential streets.

A more collaborative stance is necessary with those lawful long term off-airport car parking operators, where at present their contribution to meeting the needs of both passengers and airport related car parking provision generally is ignored. As part of this new approach, and in order to comply with the aim of increasing the number of organisations attending the Airport Travel Forum by 5, by the target date of 2025, as set out in Table 8.4 “*Travel Plan Targets*” referred to above, an invitation to attend the Forum should be extended to my client.

I trust you will find these representations raised on behalf Holiday Extras Limited of assistance to the Inspector(s) appointed by the Secretaries of State to report on Application No. 21/00031/VARCON. Should you wish to discuss any aspect of this



correspondence with my client in advance of the local public inquiry taking place, please do not hesitate to contact me. Meanwhile please acknowledge safe receipt of these representations.

I should be grateful if a copy of the Inspectors' Report and Secretaries of State's decision letter on the proposed development could be forwarded electronically to this practice as soon as it is available.

Yours faithfully

Tim North

T.F. North

Cc: Howard Dove, Operations Manage, Holiday Extras Ltd
Andrew Bird, Airparks Services Ltd
Domonic Barber, Location Lead, Airparks Services Ltd