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Written Representations on behalf of Holiday Extras Ltd Concerning Airport Surface Access with Particular Reference to Long Term Passenger related Car Parking Provision

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1.00 INTRODUCTION

1.01 Holiday Extras Ltd are 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.

1.02 My clients support the DCO application as it will deliver significant socio-economic benefits, both regionally as well as nationally. They also appreciate that there is a need for a comprehensive package of measures to mitigate the environmental effects derived from the Airport's expansion, seen in the context of the Government's specific net zero strategy for aviation.

1.03 Holiday Extras Limited however, do have a number of concerns surrounding the topic of airport surface access, with particular reference to long term passenger related car parking provision. This document sets out those salient issues comprising my clients' concerns as they relate to the DCO application current being promoted by Luton Rising, with its underlying intention to build a new terminal accompanied by new infrastructure to increase London Luton' Airport's capacity in terms of the numbers of flights and passengers it can handle from 18mppa[1] to 32mppa.

1.04 My clients raised representations to the Pre-Application Consultation Exercises concerning the same development promoted by Luton Rising. They appreciate that the DCO application involves three separate phases, with construction activities taking place over a 16-year period subject to forecast passenger demand, being regulated in accordance with what is referred to as Green Controlled Growth.

1.05 Holiday Extras Limited's subsidiary company Airparks operate a traditional long term off-airport car parking business from Slip End based on the park and ride model, where cars are parked before the customer is transported by bus, to and from London Luton Airport (hereinafter referred to as LLA). My clients' current fleet of vehicles comprise 5 x Kinglong buses, each having 27 seats with 34 standing capacity with luggage racks and

[1] Mppa – million passengers per annum

interior and exterior cameras. The five buses are compliant with Euro 6 emission levels, resulting in lower carbon emissions and improvements to air quality.

1.06 The total number of car parking spaces available at Slip End varies between 3,500 and 5,500 spaces, being dependent on market conditions, which in turn dictates the extent to which customers' vehicles are either self-parked or block-parked. In order to appreciate the scale of Airparks' business, the maximum capacity in terms of car parking spaces at their Slip End site is greater than the provision of existing long stay passenger on-airport car parking at London Luton Airport in 2019, prior to the construction of the Luton DART. It is equivalent to 84%[2] of all anticipated long stay on-airport car parking in 2043 at which time passenger throughput is expected to reach 32mppa, with the Luton DART serving two terminals.

2.00 FACTORS INFLUENCING LONG TERM AIRPORT RELATED CAR PARKING

2.01 It is relevant to indicate at the outset that Luton Borough Council along with Luton Rising, the trading name of London Luton Airport Ltd (hereinafter referred to as LLAL), have little influence over airport-related car parking demand, which is calculated by way of a series of assessments of how many passengers or movements can be handled over a busy hour. There is no simple definition of airport capacity. It is influenced by a range of individual capacities which themselves are derived from a number of separate parameters, including i) flight departure and arrival times; (ii) runway length; iii) apronage; iv) passenger terminal facilities; v) surface access, along with imposed restrictions governing environmental considerations.

2.02 Airport related car parking demand in a similar way is also influenced by a considerable number of issues, including availability of a private car; accessibility to public transport modes; price, associated with the cost of public transport or the parking product; the role played by low-cost carriers in route selection and journey frequency; intensity of hourly arrival and departures based on slot allocations; highway capacity; historic parking demand; and estimated non-UK leisure and business passenger throughput; to name some of the more important factors. Equally relevant is a wide variety of considerations falling under the umbrella of customer behaviour. These involve needs and attitudes in

[2] This figure has been amended from the 81% referred to in the initial representations lodged with PINS and at the Open Floor Hearing on 10th August 2023.

making air travel decisions encompassing matters such as safety, security and more recently the COVID-19 pandemic *(behavioural considerations)* to passenger catchment areas and route overlaps with competing airports.

2.03 This vast array of material considerations requires above all a flexible approach to be taken to airport related parking demand and supply. It is particularly important where a 16-year construction period is involved, with an anticipated completion of the last phase (Phase 2b) not programmed until the fourth quarter of 2040. The 16-year construction period is interspersed with a five-year gap between completion of the Phase 1 works in the fourth quarter of 2027, and construction work commencing on Phase 2a in the first quarter of 2033. The 5-year period during which time construction activity will not be present on the airport, coincides with an expected rise in passenger throughput.

2.04 The same factors also require a collaborative approach to be adopted with long term off-airport car parking companies such as Holiday Extras Limited. This becomes evident when it is realised that the current capacity of lawful long term off-airport car parking sites serving London Luton Airport, jointly exceeds that of the long stay on-airport product, at an anticipated throughput of 21.5mppa and 27mppa.[3]

2.05 In this regard, Holiday Extras Limited, through their subsidiary company Airparks, based at Slip End, is the largest private long term off airport car parking company, making a significant contribution to the supply of airport related passenger car parking at London Luton Airport over the past 20 years.

3.00 SURFACE ACCESS STRATEGY (SAS)

3.01 The current DCO application incorporates a Surface Access Strategy (SAS) [TR020001/APP/7.12] which sets out the vision and objectives of the applicant, Luton Rising, for surface access over a 20-year time period, along with priority areas and interventions that form part of their approach to achieving their vision.

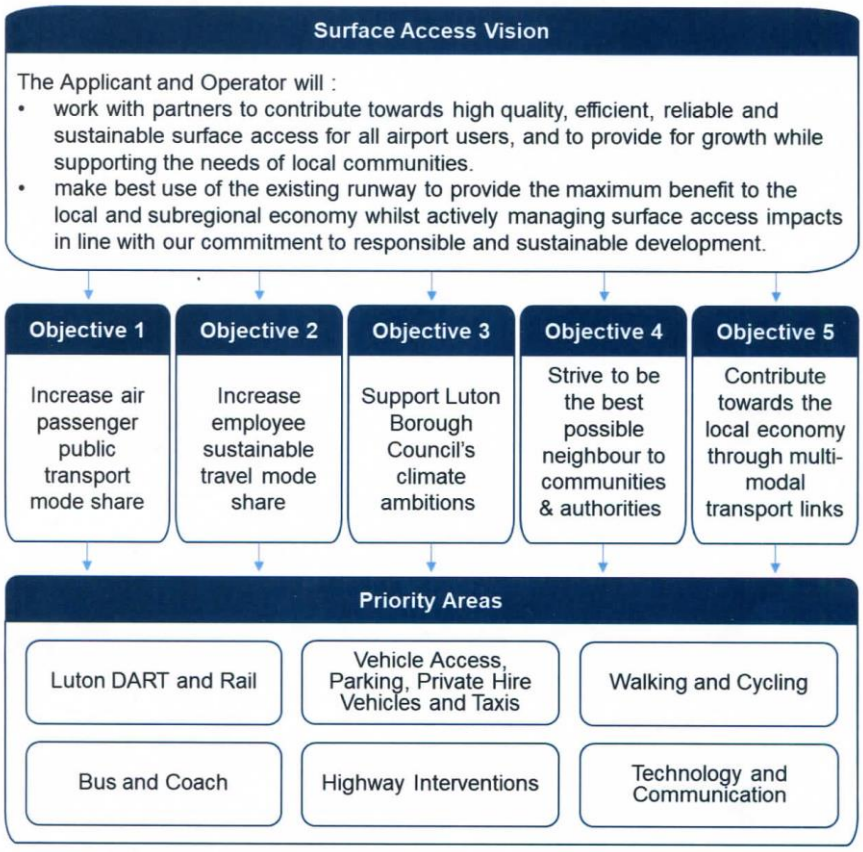
3.02 It is required to be differentiated from the Framework Travel Plan (hereinafter referred to as FTP) which is the implementation plan for the SAS, setting out a framework for the content of Travel Plans (TPs) which are to be produced should consent be granted for

[3] Document Ref: TR02001/APP/5.02 Volume 5 Environmental Statement and Related Documents 5.02 Appendix 4.1 Construction Method Statement and Programme Report

the DCO development. The FTP submitted as part of the DCO application contains a long list of interventions and measures, along with further information about how the targets are to be set, along with details about the role of the Travel Plan Coordinator. The Green Controlled Growth Framework (hereinafter referred to as GCG) sets out processes for monitoring and mitigating environmental effects in four separate environmental topic areas, including surface access, based on defined legally defined limit and thresholds.

3.03 I have reproduced below Figure 3.1 entitled Surface Access Strategy's Vision, Objectives and Priority Areas taken from Document TR020001/APP/7.12 Surface Access Strategy, which include multiple interventions associated with the priority areas comprising the Applicant's surface access toolbox.

Figure 3.1: The Surface Access Strategy's vision, objectives and priority areas



3.04 The SAS incorporates Limits and Targets, with the Limits being set out in both the Green Controlled Growth Framework Document TR020001/APP/7.08 and the SAS Document TR020001/APP/7.12; with the Targets set out in 5-year Travel Plans secured through the FTP. The distinction in terms of SAS Surface Access Limits and Targets is conveniently set out at Table 5.1 of Document TR020001/APP/7.12, reproduced overleaf:-

Table 5.1: GCG surface access mode share Limits and Targets

Distinction	Limits	Targets
Set out in	**GCG Framework [TR020001/APP/7.08]**	**FTP [TR020001/APP/7.13]** specifies these are to be set out in five-yearly TPs
Securing mechanism	Compliance with GCG Framework secured through the DCO	Production of TPs is a Requirement of the FTP (secured through the DCO)
Scope	Three Limits covering passenger and staff mode share, and GHG emissions only	Additional more granular Targets required beyond the three Limits
Basis	'Reasonable worst-case' not to be exceeded, to ensure environmental effects are no worse forecast at point of DCO	More ambitious than Limits, aligned to delivery of wider surface access Vision and Objections
Consequence	Growth can be stopped if Limits are breached	Growth will not be stopped, but additional interventions to be implemented in relevant priority areas if Targets not achieved
Timeframe	Set at point of DCO and linked to passenger throughput (not time), corresponding with assessment phases of the ES	Targets reviewed and updated within lifespan of each subsequent five-yearly TP

3.05 The GCG is a binding framework for managing the control of the airport through the coming decades within definitive environmental limits, which in terms of surface access is directly related to potential congestion on the local and strategic road networks. In terms of surface access, the limits seek to control changes in mode share, comprising maximum percentage mode shares for "*non-sustainable*" passenger travel, and "*non-sustainable*" staff travel, which are not to be exceeded. Table 5.2 also taken from Document TR020001/APP/7.12 Surface Access Strategy outlines GCG surface access mode share limits:

Table 5.2: GCG surface access mode share Limits

Limit	Limit Values			
	Phase 1	Phase 2a	Phase 2b	Full Operating Capacity
Air passenger non-sustainable travel mode share	**Limit**			
	62%	60%	55%	55%
	Level 2 Threshold			
	60%	58%	53%	53%
	Level 1 Threshold			
	58%	56%	51%	51%
Airport staff non-sustainable travel mode share	**Limit**			
	70%	68%	64%	60%
	Level 2 Threshold			
	69%	66%	62%	58%
	Level 1 Threshold			
	67%	64%	61%	56%
Note: all Limit and Threshold values have been rounded to zero decimal places				

3.06 The definition of "*passenger non-sustainable travel*" as part of an "*unsustainable mode*" is defined in paragraph 3.5.17d. of the Green Controlled Growth Explanatory Note [TR020001/APP/7.07] as comprising "*travel by car, taxi (Hackney carriage), private hire vehicle (minicab/Uber, etc) motor cycle and any other modes with the exception of minibus, bus, coach, rail and tube (also referenced as metro, subway, tram in the CAA survey), walking, wheeling, cycling and other active modes (e-bikes, e-scooters, etc)*". (my emphasis)

3.07 This definition appears to exclude a traditional long term off-airport car parking facility of the kind operated by my clients from Slip End. This is despite the fact that the use conducted by Holiday Extras Limited leads to a reduction in private cars on the local highway network and as a consequence a resultant reduction in congestion and carbon emissions associated with passengers who would otherwise travel to the airport, whether as part of a "*drop off*"/"*kiss and fly*"[4] trip or parking on-airport. Moreover, it does not sit comfortably with the view expressed by the Applicant and operator that members of staff comprising part of a car share are to be classified as a sustainable trip.[5]

3.08 The document comprising Appendix F – Surface Access Monitoring Report relies on the "*main mode*" of a particular trip, despite the dataset being recognised as having fewer survey records, with its results being inconsistent. Relying on the "*main mode*" is at variance with CAA records which is determined according to the final mode of travel, being the last mode used to access the airport. It is inconsistent with the approach to monitoring passenger mode share, which as indicated in the FTP [TR020001/APP/7.13] is dependent on CAA passenger survey data, particularly the final data sets, published at Easter time.

4.00 EXPLORING MORE SUSTAINABLE APPROACHES TO SURFACE ACCESS

A. The Benefits of a Satellite Long Term Off-Airport Car Parking Site

4.01 The Examining Authority will be aware from the Open Floor Hearing 1 on Thursday 10th August 2023, that from mid November 2019 to the end of February 2020, discussions took

[4] "*Drop-off*" includes taxis, along with a wide range of "*private hire vehicles*" (PHVs) including minicabs, chauffeur and executive cars and limousines, or persons using a smart phone app website or telephone booking to arrange a ride in advance by a privately hired vehicle. "*Kiss-and-fly*" is where the passenger is driven to the Airport by a friend or relative, and then dropped off, with a friend or relative returning to their home or business, with the reverse occurring following the return of the passenger to the airport.

[5] Paragraph 4.2.5 of Document [TR020001/APP/7.12 Surface Access Strategy]

place between Holiday Extras Ltd and representatives of LLAL over the provision of a new satellite long term off-airport car parking facility, to be run jointly by both parties to meet the needs of air passengers relying on the private car mode as part of a future DCO application.

4.02 No reasons were given as to why these discussions came to an abrupt end. No reference has been made in subsequent consultation exercises exploring the opportunity of a satellite off-airport car parking facility, which has distinct benefits in reducing trips and vehicle emissions on the highway network close to LLA; minimising indiscriminate passenger car parking on surrounding residential streets; ensuring valuable space on-airport is used for optimum purposes, at the same time reducing encroachment onto Wigmore Valley Park/Green Horizons Park, a treasured local green space.

4.03 The contents of paragraph 4.15.3 of the 2019 Statutory Consultation Feedback Report Appendix A Part 2 encapsulated the concerns raised by the local community on the issue of airport related car parking taking place in residential streets, viz:

> *"4.15.3 Parking was a controversial topic for the local community, with some community consultees suggesting that providing additional car parking spaces would encourage the use of private cars, leading to additional congestion and pollution (36). Other community respondents suggested that proposals do not include sufficient parking spaces for both airport users (48) and employees (12), which would lead to airport users parking on residential streets (84). The cost of parking was a common issue raised, with concerns around the current cost of parking and drop-offs, as well as concerns that future costs would be too high (147)."*

4.04 The response from Luton Rising to this earlier consultation exercise was opaque, and in my clients view did not satisfactorily address the high cost of on-airport car parking, including that relating to parking/drop off charges, viz:-

> *"Drop off/parking charges will be/are set by the operator, however we are seeking powers to introduce additional charges for road users accessing the airport in order to encourage sustainable modes of transport. Further information can be found in the* ***SAETS***[6]*. In the application for development consent we will develop proposals into a clear framework to govern the setting and varying of charges. This will make clear how decisions will be made and set out the process to be followed before new charges could be imposed or existing charges varied."*

[6] SAETS = Surface Access Emerging Transport Strategy i.e. the document entitled "*Getting to and from the Airport - Emerging Transport Strategy"* which formed part of the consultation exercise carried out between 8th February and 4th April 2022 entitled "*Future LuToN Making Best Use of Our Existing Runway".*

4.05 It is Holiday Extras Limited's opinion that an opportunity has been lost in assessing reasonable alternatives concerning the provision of future airport related car parking as part of the current DCO application. It is considered inappropriate for the Applicant to propose a 16mppa increase in passenger throughput, covering a 16-year period through to 2043, without having first reviewed potential alternative airport related car parking locations. This is particularly apposite given that earlier consultation exercises pending the submission of the DCO application resulted in suggestions for a park and ride scheme for local users, which elicited the following response from Luton Rising:

> *"Currently, there are no proposals to provide park and ride schemes and they are deemed not necessary for the public transport strategy for the Proposed Development.*
>
> *Our surface access strategy mitigates the impact of the Proposed Development without the need for a park and ride scheme.* ***If a promoter(s) were to come forward with sites to be used for a park and ride scheme we would engage with him as appropriate, although such a scheme is not necessary as part of the Proposed Development."*** (my emphasis)

4.06 The requirement to investigate whether a satellite park and ride facility should be provided was a consideration explored during the consultation period leading up to the submission of an outline application Reference No. 18/P/5118/OUT to North Somerset Council seeking an expansion of Bristol International Airport (hereinafter referred to as BIA) from 10mppa to 12mppa. There is no reason why the same exercise should not have been undertaken by Luton Rising in which various options could have been tested according to agreed selection criteria, to highlight various strengths and weaknesses.

4.07 In the case of BIA an overarching approach was adopted to the identification of possible options for additional airport related car parking provision. This exercise included (i) sites within the Green Belt Inset Map which included part of the operational area of the airport; (ii) strategic park and ride locations remote from the Airport including land outside the Green Belt; (iii) sites within the Airport but outside the Green Belt Inset; and (iv) sites within Green Belt locations contiguous to the Airport. No such similar exercise has taken place with respect to the expansion of LLAL.

4.08 In the same vein, there is no reason why, for example, a joint exercise involving the Applicant, Holiday Extras Limited, Central Bedfordshire Council and other interest parties should not have explored the opportunity of providing a long term off-airport

satellite facility, where an agreed financial contribution derived from the income resulting from the use would be channelled into assist sustainable travel modes, as is the case with London Gatwick and London Stansted Airports. The same option could also be extended to assess the extent and frequency to which certain properties in selected residential streets rent out land on their driveways for unrelated airport car parking purposes, leading to increased car parking becoming prevalent. In this scenario, a related aim would be to secure on-street parking restrictions, preventing indiscriminate airport related car parking from taking place in primary residential areas.

4.09 A satellite long term off-airport car parking facility should have been considered in the context of the response previously set out by LLAL in paragraph 2.6.23 of the document entitled "*Getting to and from the Airport – Our Emerging Transport Strategy*":

> "*2.6.23 For those passengers that have no reasonable alternative choice to driving, we want to ensure the overall number of vehicle movements at the airport is minimised and their environmental impact is reduced where possible. We will do this by encouraging more efficient use of the road network that will lead to less vehicle mileage overall by ensuring that passenger trips to the airport made by car and taxi are as clean as possible in terms of vehicle emissions.*" (my emphasis)

4.10 A traditional long term off-airport park and ride facility would result in vehicle movements to and from LLA, being significantly reduced, whether involving private cars or "*drop-off"/"kiss-and-fly*" modes, leading to a more efficient use of the local highway network, reducing congestion and involving less overall vehicle mileage, with ensuing benefits for customers and the airport owner alike. To this end, my client's existing long term off-airport car parking use is already assisting the Applicant in meeting its future modal split in favour of public transport of 40% at a passenger throughput of 21.5mppa, or 45% at a passenger throughput of 27mppa and 32mppa.

4.11 Furthermore, the use of land at Slip End by Holiday Extras Ltd ensures compliance with the underlying objectives of Luton 2040: Climate Change and Action Plan, whose aims as far as surface access to LLA is concerned, includes an increase in trips to the Airport using active and substantive transport modes and to support the use of lower emission public transport and freight vehicles.

4.12 Parking charges on-airport for whatever product are influenced by other sources, over which Luton Rising do not have complete control, with the consequence that engagement

with lawful long term off-airport car parking operators is necessary, if a *"clear framework to govern the setting and varying of charges"* is to become a realistic objective. This is in spite of LLAL having previously recognised in Chapter 7 of the SAETS report that in seeking to deliver the best balance of sustainable surface access outcomes, requires the airport operator to take into account a number of factors including "*offsite parking*".

4.13 These options are occurring at a time when I am reliably informed by my clients that the applicant has recently secured a long term off-airport car parking facility outside the Operational Area Boundary of LLA, which I understand does not benefit from any planning permission or lawful development certificate; reinforcing the concern raised by my clients that insufficient long term on-airport related car parking is being provided as part of the current DCO application.

4.14 No invitations have ever been extended to my clients to join the Airport Transport Forum or to become a member of the London Luton Consultative Committee, nor have they been invited to the Surface Access Technical Panel, given their experience and considerable knowledge over a period in excess of 20 years of running a long term off-airport car parking business serving passengers accessing LLA.

4.15 The Examining Authority may also wish to consider what the consequences would be should my clients' long term off-airport car parking facility suddenly become unavailable for airport passengers, seen from the perspective of both lawful and unlawful airport related car parking; traffic congestion on the local highway network; increased carbon emissions; or considerations affecting air quality, the latter occurring in what has been referred to as one of the most polluted towns in the country.

5.00 FRAMEWORK TRAVEL PLAN (FTP)

5.01 To the extent that the SAS has taken no account of the contribution made by long term off-airport car parking uses in contributing to the sustainability objectives of LLA; so too does the same situation apply with regard to the FTP.

5.02 The submitted Framework Travel Plan (FTP) [TR020001/APP/7.13] sets out a framework for the content of TPs which should be produced every 5 years following the current DCO application, with its main purpose being to set out the structure and approach in developing the 5-year TPs. For vehicle access, a key priority is progressing measures

which support the uptake of electric vehicles through supporting infrastructure and incentives, as well as encouraging the use of low-emission vehicles.

5.03 TPs will contain the results of on-going monitoring and consider comments and views from stakeholders including the Airport Transport Forum (ATF), the London Luton Airport Consultative Committee (LLACC) and its dedicated Passenger Services Sub-Committee on their content and level of ambition, although as previously indicated, no role has been set aside for Holiday Extras Ltd, the largest private long term off-airport car parking operator, to effectively engage in this process.

5.04 This is a significant omission given that the primary purpose of ATFs as confirmed in paragraph 2.1.2 of the FTP [TR020001/APP/7.13] is to *"encourage partnership between airport operators, local authorities, **transport operators**, local people **and businesses**, and other relevant parties, to improve public transport access to airports, and reduce reliance on private, road-based transport, congestion, and pollution on nearby roads"*. (my emphasis).

5.05 The ATF is intended to summarise current surface access across six priority areas in any five-year period, including consideration relating to *"vehicle access, parking, private hire vehicles and taxis"*, together with the specific matters relating to drop-off and pick-up locations, car parking locations and quanta. My clients as the only major private long term off-airport car parking operator have both a role to play in these important airport access related issues, at a time when the airport operator accepts its sustainability aspirations are reliant on third parties.

5.06 In this respect, the toolbox of interventions and measures in the FTP where it concerns *"vehicle access, parking, private hire vehicles and taxis"* have implications and are pertinent to the running of a long term off-airport car parking operation. This is particularly the case in those areas of i) promoting EV charging points for passengers and the uptake of electric vehicles; ii) improving forecourt operations especially limiting queueing and anti-social drop-off; iii) incentivising a change from diesel/petrol to electric/hybrid service vehicles; iv) contributing to a feasibility review associated with the opportunity to support luggage delivery from/to the airport to/from the passengers home destination, and v) improving an understanding of passenger travel behaviour as part of more comprehensive surveys to robustly monitor progress in achieving airport targets.

6.00 GREEN CONTROLLED GROWTH (GCG)

6.01 My clients have carefully considered the GCG Framework where it is directed at surface access and the various limits and thresholds surrounding future growth at London Luton Airport, alongside the approach to the preparation of Monitoring Reports and the trigger mechanism for the submission of a Mitigation Plan. It is acknowledged that the approach is innovative and far reaching in seeking to enable the sustainable expansion of London Luton Airport, particularly in circumstances where mitigation is necessary with reliance placed on the slot co-ordination process, and capacity declarations.

6.02 The extent to which this mechanism will ensure sustainable growth at LLA will largely be dependent on whether the airport operator can advance a case that the exceedance of a Threshold or breach of a Limit is due to circumstances beyond its control. There appear to be a number of instances where a case of this nature could be advanced, resulting in a conclusion made by the Environmental Scrutiny Group (hereinafter referred to as ESG) that no exceedences have occurred. These circumstances in part are highlighted in paragraphs 2.2.36, 2.2.39 and 2.2.40 taken from Document TR020001/APP/7.07 Green Controlled Growth Explanatory Note, but this does not appear to be a comprehensive list. Indeed, it may well be that the Airport Operator is able to advance a case that due to technological advances the Limit should be amended.

6.03 It is noted that in the case of a Level 1 Threshold being exceeded, the mechanism would still allow for continued growth, despite the submission of an Annual Monitoring Report setting out additional information, pending a Level 2 Threshold being reached.

6.04 In the case of a Level 2 Threshold being exceeded, an airport operator whilst required to ensure that any future capacity declaration does not increase from the existing capacity declaration, may through the submission of either a Level 2 Plan or an Annual Monitoring Report seek confirmation that the relevant effects no longer exceed the Level 2 Threshold. In the event that a Level 2 Plan considers that continued operations at the declared capacity are not likely to result in the effects increasing above the Limit, the Level 2 Plan may subsequently consider whether the airport capacity declaration can be increased. This process still allows for continued growth to take place dependant on the mitigation details in an approved Level 2 Plan.

6.05 In cases where there is an impact over a Limit, following which a Mitigation Plan is required to be produced and approved indicating a programme for the implementation of any required mitigation; and any resultant mitigation is not successful, may lead the airport operator to consider a planned reduction in capacity. How the process of planned capacity reduction and its impact on slot allocation occurs does not seem to have been considered. Accordingly, the operation of the GCG Framework does not appear to be as comprehensive in preventing the growth of LLA as may be suggested.

6.06 Holiday Extras Limited have reservations concerning the governance of the ESG whose independent Chair will initially be nominated by the airport operator, following consultation with the Applicant and Secretary of State. Luton Rising is the trading company of LLAL, with Luton Borough Council having a controlling interest in the company by virtue of its majority shareholding. The majority of parties represented on the ESG comprise local authorities with a tendency to pursue common goals, without the added diversity of views from private organisations with surface access business interests. Equally relevant is the remit of the Surface Access Technical Panel, where Holiday Extras Limited have a wealth of experience as a successful long term off-airport business, yet again no private organisations with surface access interests relating to airport car parking are expected to comprise this Panel, despite it being accepted that *"not all of the organisations listed above have this in-house capacity"*.[7]

7.00 PASSENGER MODAL SHARE CONSIDERATIONS

7.01 Table 1 overleaf sets out the future baseline at 2027, 2039 and 2043, without the proposed development; along with modal share with the proposed development forming part of the DCO application at Phase 1 - 2027, Phase 2a - 2039 and Phase 2b - 2043.

7.02 37.58% of passengers relied on public transport to access LLA in 2019 at which time the airport recorded a throughput of 18mppa. Reliance on the same travel mode 8 years later in 2027, is expected to lead to an increase of only 2.42% or 40% of passengers relying on public transport at a 21.5mppa throughput, irrespective of whether the DCO application is granted by the Secretaries of State. In 2027, the numbers of people arriving at LLA by the least sustainable mode, namely taxi/minicab and private car drop off/pick up will account for 43% of the total numbers of passengers accessing the airport, resulting in the

[7] Paragraph 2.4.27 of Document [TR020001/APP/7/07] Green Controlled Growth Explanatory Note

least sustainable mode exceeding the most sustainable access mode of public transport by 3%, despite the Luton DART being fully operational.

TABLE 1

Passenger Modal Share showing Future Baseline at 2027, 2039 and 2043, Without the Proposed Development; along with Modal Share with the Proposed Development at Phase 1 - 2027, Phase 2a - 2039 and Phase 2b – 2043

%	Future Base Line Without Development 2027, 2039, 2043	Phase 1 21.5mppa 2027	Phase 2a 27mppa 2039	Phase 2b 32mppa 2043
Bus/Coach	17	17	18	18
Rail	23	23	27	27
Total Public Transport	**40**	**40***	**45***	**45***
Taxi/Minicab	18	17	15.5	15.5
Private Car Drop off/Pick Up	26	26	23.5	23.5
Private Car On-Airport	9.5	9.5	8.7	8.7
Private Car Off-Airport	5.2	5.2	5	5
Rental Car	2	2	2	2
Total Private Car	**42.7**	**42.7**	**39.2**	**39.2**

Source: Table 9.5 Passenger Mode Split (person trips) taken from Document 7.02 Transport Assessment – Part 3 of 4 (Chapters 9-10)

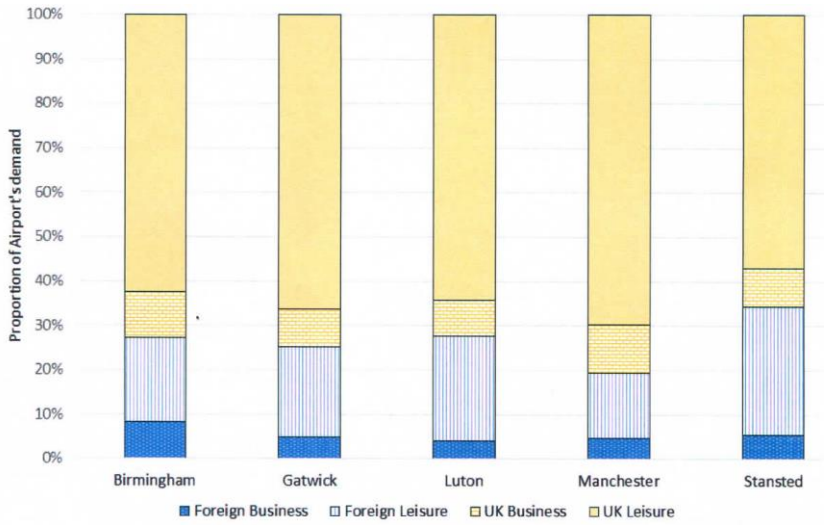
* Air passenger public transport mode share minimum figures related to GCG limits

7.03 To the extent that Luton Rising are on record as suggesting at the Inquiry into their 19mppa *"called in"* proposals that public transport modal share could rise to 47%, with the supporting Public Transport Strategy Report indicating the airport could grow the same modal share to around 50%, raises the question whether the proposed future public transport share at 45% in 2043 is sufficiently ambitious.[8] In addition, it poses the question as to what extent the figure of 45% has been selected to ensure compliance with Green Controlled Growth limits.

7.04 Six important aspects should be taken into account when considering public transport modal share figures set out in Table 1. Firstly, public transport modal share is largely dependent on non-UK business and leisure passengers, compared with UK based

[8] Document TR020001/APP/7.02 Transport Assessment – Part 3 of 4 (Chapters 9-10) at paragraph 9.5.18

business and leisure passengers[9]. This is a matter which falls outside the direct control of Luton Rising. LLA and London Stansted are comparable airports in terms of both UK based and foreign travellers' demand segments. The Environmental Statement relating to the expansion of London Stansted Airport to 43mppa confirms that in terms of foreign leisure and foreign business passengers, the proportion of trips made by public transport are significantly higher than those made by private car, with 22% of foreign leisure passengers dependent on public transport mode.



Source: Figure 3.1: Selected UK Airports (2016): Trip Purpose and Passengers' Place of Residence Split – Document 7.02 Transport Assessment Appendices – Part 3 of 3 (Appendices G-M)

7.05 Secondly in terms of UK based leisure and business travellers, a combination of the availability and frequency of public transport services found within a short distance of a passengers' home, along with whether interchanges are necessary as part of the journey to or from the selected airport, strongly influences modal choice. The passenger profiling data supplied by Holiday Extras Ltd relating to the use of land at Slip End as a long term off-airport car park, examined later in these representations is influenced by the same consideration.

7.06 Thirdly, those passengers who have to rely on early morning departure flight times will have to factor into their modal choice to LLA not only price considerations; but competing airports offering equivalent destinations. A consideration of "*lead time*" will be relevant, calculated as the time spent from the point of entry into the terminal, passing through check-in and security and proceeding to the flight departure gate. It also

[9] In 2016, Luton Airport CAA Data Summary of modal split found that 42% of non -UK business travellers and 75.5% of non-UK leisure travellers relied on public transport.

necessitates, in terms of UK based arriving passengers, taking into consideration the "*lag time*", being the time spent from landing, passing through passport control; collecting any luggage from the baggage reclaim, before proceeding through customs and exiting the terminal. These time periods shown diagrammatically below are likely to be prolonged at periods when large numbers of passengers are passing through the airport, between 0400 and 0700 hrs, or arriving at the airport between 2200 hrs and midnight.

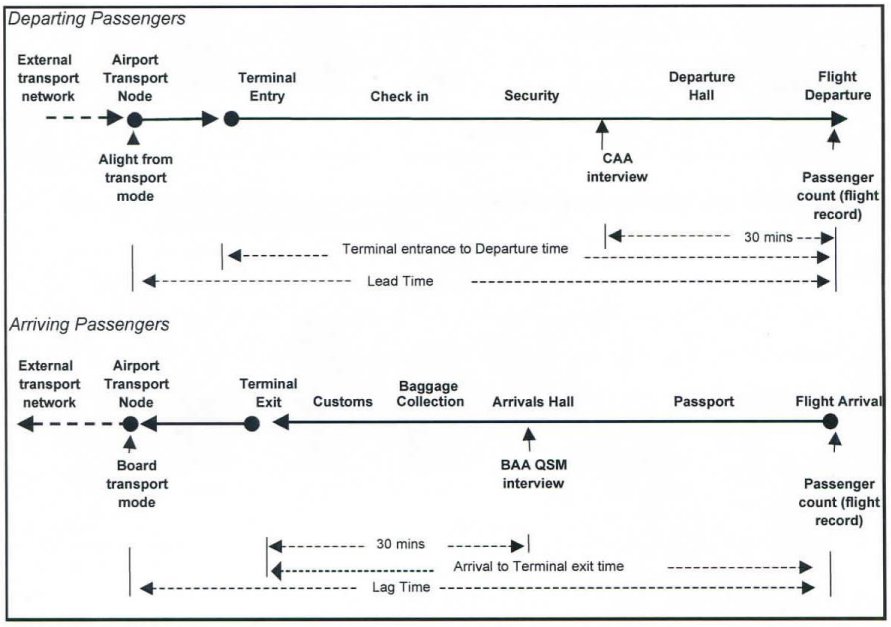
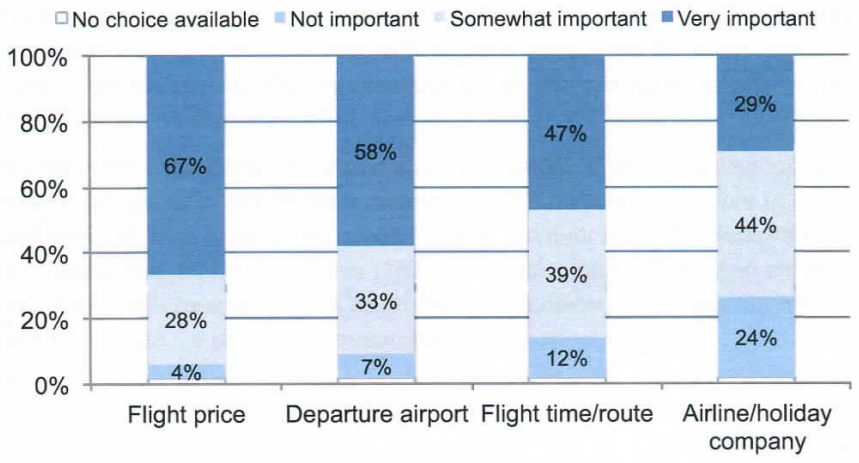


Figure 1: Activities Involved in Traversing an Airport

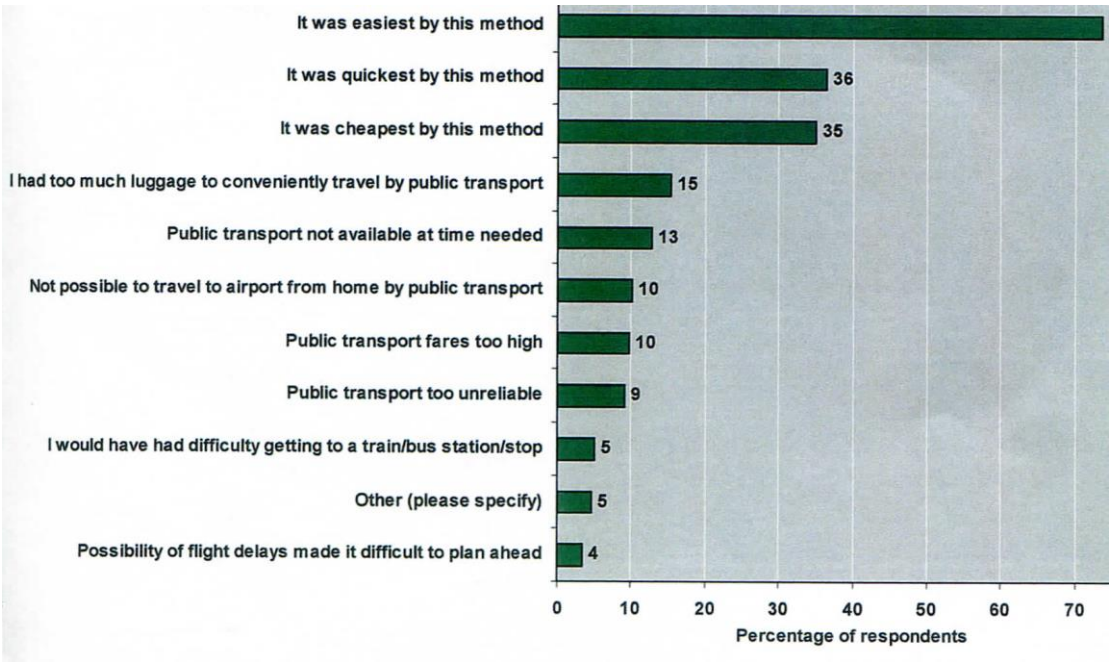
7.07 Factors influencing flight choice have a knock-on effect on modal choice, as evident from Figure 12 taken from the Final Report entitled "*Consumer Research for UK Aviation Sector*" CAP 1303, prepared by Collaborative Research and published by the CAA in 2015.



Q23 To what extent were the following factors considerations in your choice of this flight?
Base: decision-makers who have flown in past 12 months (1,330)

7.08 In considering modal choice, reference should be made to a module of questions commissioned and designed by the Department of Transport which was included in the Office for National Statistics Omnibus Survey in February 2010. The table reproduced below sets out the reasons for choosing to travel by car/van or taxi (private transport) on their last trip to an airport, taken from a sample of 1005 respondents, from which it can be seen that convenience, speed and cheapness all formed principal considerations.

Reasons for Travelling to the Airport by Car/Van or Taxi



7.09 Appeal decisions involving long term off-airport car parking uses have demonstrated the significance to be attached to customer choice in the provision of surface access to an airport. In two separate appeals allowed by The Planning Inspectorate on 18th May 2011[10] involving Austin Hayes (UK) Ltd and land at Sentinel Car Park, Warren House Lane, Yeadon, Leeds LS19 7FT; and Learmonth Property Investment Co Ltd on land at Unit 1A Leeds Bradford Airport Industrial Estate, Harrogate Road, Leeds LS19 7WP, the Inspector Mr. P.J. Asquith MA(Hons) MA MRTPI concluded on the topic of "*customer choice*":-

> *"55. A further factor to be borne in mind is that the proposals for off-airport parking provision would provide an element of customer choice compared with the near-monopolistic offer that would exist in their absence. Increased choice is a thrust of PPS4 and one which is repeated in the Ministerial Statement of 23 March 2011, Planning for Growth by the Minister for Decentralisation."*

[10] PINS Ref. No. APP/N4720/A/10/2139567 and APP/N4720/A/10/2138849 refer

7.10 A similar conclusion was reached in two appeals concerning land at City Place, Crawley, West Sussex, allowed on appeal on 17th August 2012[11], in which the Inspector had the following comments to make on the subject of "*consumer choice*":-

> *"23. However, the Council states the Annual Parking Survey indicates that the existing long-term sites, both within and outside the airport boundary, are not fully occupied. While this may be so, there are many reasons for airport visitors choosing a particular car park, including, price, type of parking offered, (e.g. self-drive, meet-and-greet, open air, covered multi-storey), proximity and ease of access to terminal, ease of access from their point of origin, security, and reliability of the parking operator.*
>
> *24. Although full occupation of the existing car parks cannot be guaranteed, and thus there is some spare capacity to cater for future needs, this does not mean that all parking proposals for new car parking should necessarily be refused. The Gatwick Master Plan Draft for Consultation 2011 (some two years after the Car Parking Strategy) identifies that attractive long-term parking is shown to be successful in reducing the proportion of passengers being dropped off, thereby reducing the volume of road trips to and from the airport."*

7.11 Fourthly, a factor which remains important, being accepted by most airport operators, is that there will always be passengers who will continue to choose to travel to and from an airport by private car. These passengers include the elderly, those who are mobility impaired, and those who travel from locations that are not well served by public transport, including groups and larger families, often with young children. The same passenger cohorts will also include those who are required to leave early in the morning to access LLA, and those passengers arriving home in the early hours, who may live some distance from the point at which they can access public transport.

7.12 Fifthly, the increase in total public transport mode shown in Table 1 above between Phase 1 and Phase 2a amounting to 5% over a period of 12 years, should the DCO application be accepted, has to be seen in context, namely it is during the same time period 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. To what extent this factor will impact on passengers' choice in travelling to LLA does not appear to have been analysed, being an integral part of those uncertainties surrounding surface access assessments, and why it is contended sufficient "*headroom*" or "*contingencies*" should be taken into account in any surface access considerations.

[11] PINS Ref. No. APP/Q3820/C/12/2171971 and APP/Q3820/C/12/2171972 refer

7.13 Sixthly, the information supplied in Document TR020001/APP/5.01 reveals that in terms of rail passengers, the greatest share in distribution of additional passenger loadings over each phase of the DCO application is in locations situated to the south of the airport, extending from Luton Airport Parkway Station to West Hampstead occupying a relatively small proportion of the catchment population of LLA.

8.00 LEAST SUSTAINABLE TRIPS TO LLA

B. Drop-Off and Kiss-and-Fly Modes

8.01 The Surface Access Strategy (hereinafter referred to as SAS) comprising part of the DCO application does not in any way grapple with the least sustainable means of passenger access to LLA, being what has been termed as "*kiss-and-fly*", along with taxis/minicabs, sometimes referred to as "*drop-off*"; both modes involving a doubling of trips to the same airport.

8.02 It is counter-intuitive to set up a charging mechanism at the airport's car parks[12] which on the one hand seeks to discourage the "*kiss-and-fly*" mode, whilst on the other, simultaneously proposing a steep increase in the number of drop-off and taxi spaces over the three phases of the DCO development, along with an additional pick/drop off area provided in car park 12 in Phase 2b.

8.03 The management of vehicle demand through the use of access and parking charges, whilst a key component associated with incentivising sustainable modes, vehicle choice and protecting surrounding communities from potential negative impacts; has the ability to give rise to unintended consequences in terms of parking in surrounding residential streets, in order to avoid having to pay costly on-airport car parking charges. In this respect, the pricing strategy adopted by Luton Rising towards all passenger car parking products, including the cost of using the Luton DART, is strongly correlated to the demand for on-airport passenger car parking products, including the extent to which passengers will then rely on the least sustainable access modes to the same airport.

8.04 In the case of the current DCO application, a far more reaching impact is that all the proposed interventions and measures require funding to support both capital and operating costs. No framework forming part of the DCO application assesses the costs

[12] Table 6.1 of Document [TR020001/APP/7.12 Surface Access Strategy]

and benefits of surface access interventions to ensure investment decisions maximise the opportunity of reaching set targets, seen in terms of the choice of modal access share generally.

8.05 Any aim of incentivising the use of cleaner greener vehicles serving the airport as part of a move to zero emissions has an opportunity cost; with the passenger asking themselves the question of whether there are alternative more reliable cheaper options; an important consideration to those households who are confronting cost of living difficulties or other financial challenges.

8.06 The contents of the Transport Assessment Document No. TR020001/APP/7.02 reveal that a large proportion of its contents are based on demonstrating that there will be available capacity on both the rail network and highway network to accommodate the anticipated growth at LLA through to 2043 when a passenger throughput of 32mppa is anticipated. Holiday Extras Limited do not dispute these conclusions, but they constitute only part of those primary considerations relating to modal choice. In itself capacity considerations should not be portrayed as representing the primary criterion governing passenger choice of preferred mode to LLA when assessing public transport use, especially at a time when improvements are to be carried out to the local and wider highway network as part of the same DCO proposals.

8.07 Table 1 reveals that in assessing public transport provision, only a limited increase in bus/coach modal share is expected over the 16-year construction period associated with the DCO application, which appears inconsistent with the primary aim of the Local Transport Plan 3[13] to improve east-west connectivity. In 2012, 16% of passengers relied upon bus/coach to access LLA. This is expected to reach 18% in 2043, notwithstanding spare capacity being available on the various coach services, by which time passenger throughput at the same airport will have increased over 333% over the same 29 year period. The figure of 18% in 2043 should be compared with that at London Stansted Airport, where in 2016 bus/coach patronage accounted for 23% of modal share, both airports revealing comparable passenger profiles.

[13] The Central Bedfordshire Transport Strategy 2011-2026

8.08 A 10% increase is expected between 2012 and 2043 in rail modal share, representing the largest percentage increase in public transport use to LLA. A comparison between this figure with that representing the least sustainable mode of trips made to the same airport by taxi/minicab and private car drop-off between 2010 and 2043, reveals that trips made to LLA will decrease from 42.7% to 39% between these two dates i.e by only 3.7%[14], during which time passenger throughput at the same airport has increased 368%. The inevitable conclusion to be derived from this exercise is that reliance on the least sustainable mode of access to LLA will continue to form a significant proportion of trips into the future.

8.09 The impact of kiss-and-fly as a mode of access has been studied by Dr. Greg Marsden of the Institute of Transport Studies at Leeds University. He examined passenger access to Leeds-Bradford International Airport through the provision of two studies undertaken in 2004 and 2005. 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.

8.10 The figure of 40% of passengers being dropped off at Leeds Bradford International Airport by friends in Dr Greg Marsden's study is not dissimilar from the 43% of passengers who it is anticipated will either rely on "*kiss-and-fly*" and "*drop-off*" modes in 2027, or the 39% representing the same modes in 2039 and 2043, as revealed in Table 1 above. It is my client's view that this mode is not being sufficiently curtailed in terms of future airport related car parking supply at LLA into the foreseeable future.

8.11 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

[14] Car drop-off and taxi accounted for 42.7% of passenger modal share in 2010 - Table 32: LLA Passenger Mode Share by Journey Purpose in 2010 set out in the Transport Assessment prepared by URS Infrastructure and Environment Ltd dated November 2012 supporting the Application No.12/01400/FUL known as Project Curium seeking a proposed 18mppa throughput; compared with taxi/minicab and private car drop off/pick up set out in Table 1 above, with reliance placed on CAA passenger data.

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.

8.12 Whilst LLA imposes a charge of £5 for 10 minutes and £1 per minute thereafter for dropping off or picking up passengers closest to the terminal building; drop off/pick up is free in the long stay car park for a period of one hour, following which periods of up to 2 hours are charged at £5.00.[15] The resultant cost provisions are not considered to be a sufficient disincentive for those relying on the "*kiss-and-fly*" or "*drop-off*" modes where the passenger is neither elderly nor of restricted mobility, with concerns raised that a meaningful shift in promoting alternative more sustainable modes of access to the same airport will not arise.

8.13 The same "*kiss-and-fly*" and "*drop-off*" modes also have to be looked at in the context that where no parking restrictions have been imposed in neighbouring residential streets, any subsequent increase in on-airport parking charges relating to the dropping off or picking up of passengers has the prospect of decanting cars, using neighbouring residential streets for the same purpose. This is an issue which has been singled out for specific mention by local residents as part of their initial representations to the DCO application.

8.14 The preceding paragraphs are required to be seen in the context of the toolbox of interventions relating to "*vehicle access, parking, private hire vehicles and taxis*", comprising part of the Framework Travel Plan (hereinafter referred to as FTP) which seek to introduce measures to encourage more efficient use of taxi and private hire trips. Whilst it is possible to ensure through related infrastructure governing on-airport circulation space, that taxis and minicabs are occupied in both directions, thereby reducing the number of empty vehicle trips coming into and out of the airport, a similar mechanism is not possible taking into account trips made by the "*kiss-and-fly*" mode.

C. Airport Related Car Parking at Hotels/Guest Houses

8.15 The DCO application has not examined as part of surface access considerations the approach taken towards airport related car parking at hotels/guest houses. In considering this topic, mention should be made of a Court of Appeal judgment involving

[15] Table 6.1 Existing Access and Parking Charging at the Airport taken from Document TR020001/APP/7.02 Transport Assessment Appendices – Part 2 of 3 (Appendix F)

Harrods Ltd v Secretary of state for the Environment Transport and The Regions and Another (2003) JPL 108 in which it was held by Lord Justice Schiemann who gave the leading judgment with which other Lord Justices concurred, that in the context of Harrods Department store it was not appropriate to concentrate upon what is incidental to this particular shop, given both the way it is run and its needs. The correct approach is to consider what shops in general have by way of reasonably incidental activities. That approach was correct because it was stated one must first consider, whether on its face, the introduction of the new use would amount to a material change of use, ignoring the provisions of the Use Classes Order. It should then be decided whether that change was material.

8.16 Applying the principles arising from the "*Harrods*" Court of Appeal judgment, it is not appropriate to concentrate on what may be "*incidental*" to hotels and guest houses lying within the vicinity of LLA, given the way they are run and their needs. The correct approach is to consider what hotels in general have by way of reasonably incidental activities. It is not generally the case that hotels incorporate as part of their activities, additional car parking to service what has been referred to as "*stay and fly*" packages, in that, it is not a general or normal incidental use associated with a hotel or guest house.

8.17 The presence of additional cars parked within the grounds of a hotel or guest house as part of a "*stay and fly*" package involves additional traffic movements beyond those which would generally be attributable to the primary use of land as a hotel or guest house. "*Stay and fly*" packages often involve customers' cars being moved by a long term off-airport car parking operator to an alternative site whilst the passenger is away on holiday or on a business trip, only to be brought back to the hotel or guest house awaiting the customer's return. Customers' cars are not always retained in the same position in the hotel car park over the duration of their trip, since not only are spaces required in anticipation of a customer's return, but the car park would not be able to properly function and meet the general needs of the hotel or guest house in such circumstances. The requirement to continually move cars to and from the hotel/guest house is due to the fact that in the overwhelming majority of cases, individual hotels and guest houses have a finite amount of land used for car parking purposes, and do not have ready access to adjoining land which may be used for overspill car parking purposes.

8.18 The approach confirmed in the Court of Appeal judgement in the "*Harrods*" case and its general application to airport related car parking at hotels/guest houses enjoys support through an earlier Lawful Development Certificate appeal decision (PINS Ref. Nos. APP/M3645/X/00/1046740 and A/11/1046484) dated 2nd February 2001 concerning land at the Hunters Moon Inn, Copthorne Bank, Copthorne, West Sussex in Tandridge DC's administrative area. This case involved a refusal of planning permission, along with a refusal to issue of a Lawful Development Certificate where, in the case of the latter, it related to the use of the hotel car park by hotel guests who were travelling elsewhere.

8.19 Paragraphs 13 and 14 of the Hunters Moon appeal decision set out the Inspector's conclusions in respect of the Section 195 appeal, viz:-

> *"13. Whilst the use of the hotel car park by guests is clearly ancillary to the lawful use of the hotel for the duration of their stay, I am unable to accept that there is functional link which ensures for up to 15 or 28 days after guests have vacated their rooms, taken their luggage and flown from Gatwick airport to a destination where they then stay in other accommodation. Although the owners of the parked vehicles return to the hotel to pick up their cars at the end of the holiday, the evidence indicates that fee of them stay at the hotel for another night. Turning to the scale of the use, it is self-evident that the use of the hotel car park by hotel guests whilst they are actually staying there is unlikely to generate a parking accumulation much in excess of 10 cars, whereas the parking accumulation resulting from Gatwick parking facility was acknowledged to be up to 100 or more cars. On that basis, I consider that the scale of the use is such that it constitutes a primary element in a mixed use of the land.*
>
> *14. I conclude as a matter of fact and degree that the use of the car park by hotel guests who have vacated the hotel and are travelling elsewhere is not ancillary or incidental to the lawful use of the land as a hotel/restaurant/public house. I also conclude that such use would be in breach of the enforcement notice upheld on appeal in February 1990. I therefore find that the Council's decision to refuse the application was well founded and I shall dismiss the appeal."*

D. The Significance to be Attached to Transportation Network Companies (TNCs)

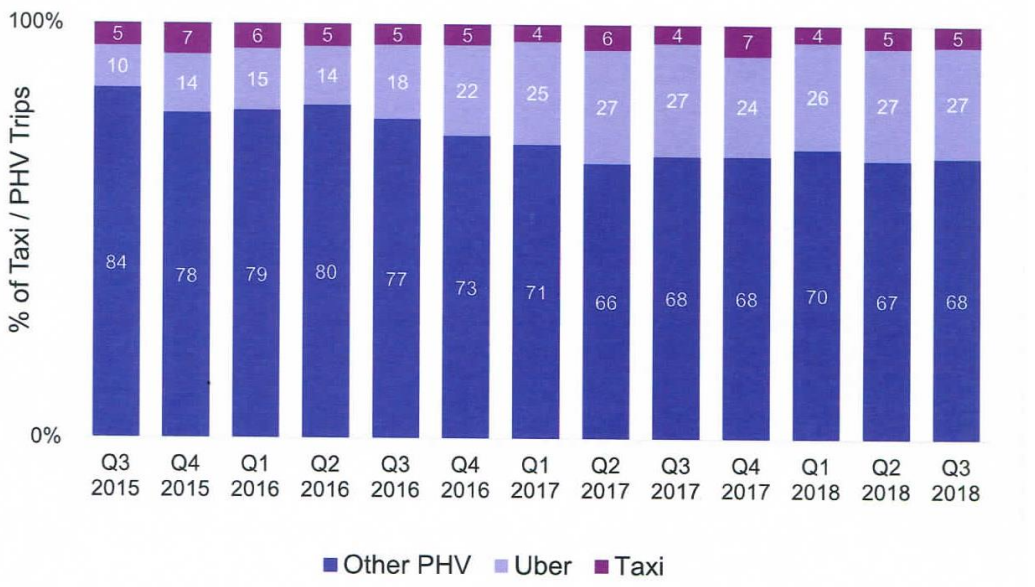
8.20 A further aspect of surface access provision to LLA which it is contended has not been afforded the necessary weight in the submission of the DCO application submitted on behalf of Luton Rising concerns the rise in recent years of a number of technological platforms, which match drivers with car parking spaces through their websites and apps, representing part of what has been referred to as the "*sharing economy*".[16] It is operated in

[16] These ride-sharing/ride-hailing services such as Uber, Lyft and DiDi are sometimes referred to as TNCs

the same way that historically AirBnB has helped people share their houses with holidaymakers, or Uber and Lyft have allowed drivers to share their cars with passengers.

8.21 TNCs comprise the first of a number of new mobility options which in time may include connected or autonomous vehicles (CAVs). TNCs generate substantially less revenue per passenger than on-airport parking, taxis and rental cars, effectively cutting the airport's income. Research relating to New York's three airports supports the view that TNCs have resulted in a sizeable reduction in on-airport car parking. The same situation is becoming evident at UK airports with their increasing impact gauged by Graphic 3.66 taken from the London Heathrow Surface Access Proposals dated June 2019:

Graphic 3.66: Taxi / PHV passenger share[116]



8.22 A number of benefits can be identified from TNCs which offer all the advantages of a traditional taxi service. These include:

- Uber offers flexibility to drivers in controlling their level of income in accordance with their own working hours, with the driver being the boss.
- Uber offers flexibility to customers as they can use the application any time whenever they want to book a ride.
- Uber is generally secure for passengers making travelling comfortable and safe;

- Cost effectiveness. Uber journeys tend to be cheaper than traditional taxis in that they do not have a fixed pricing system. However, it is worth noting that Ubers rely on "*surge pricing*" which means that pricing either increases or decreases in accordance with demand and supply of customers.

8.23 The growth of TNCs means that passengers are effectively trading down from a higher trading product or taxi service, to a lower-revenue higher-volume TNC product, with severe implications for airports, in that they face declining financial revenues as TNC usage increases. It is contended that airports must consider the role and impact of pricing as a demand management tool, for example, using pricing to reduce terminal kerbside congestion, directing private vehicles, "*kiss-and-fly*" mode to different parking areas and improving the use of remote car parks or encouraging mode share shifts involving satellite facilities.

E. The Rise in the Importance of Technological Platforms

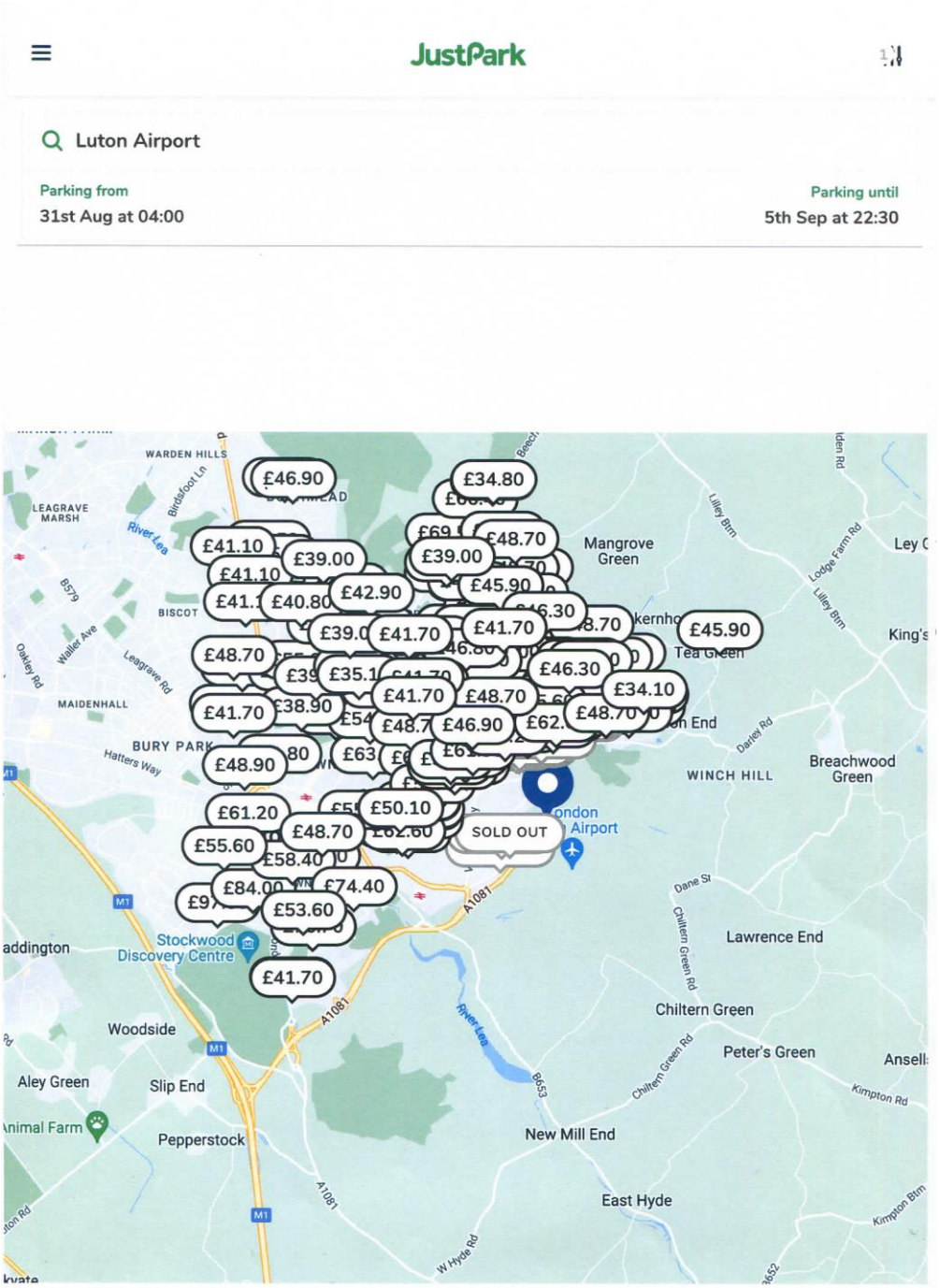
8.24 JustPark is one of a number of technological platforms which has as its mission to transform the way drivers look for parking spaces, whilst delivering cash to homeowners who rent out their driveways, enabling other business such as hotels to maximise their income from airport related car parking. The company has claimed that over 23% of car journeys involve some kind of parking pain – that is 190 million trips per month, with drivers suffering from both uncertainty (availability, prices, restrictions, etc) and inconvenience (full car parks, slow payments, fines) on a daily basis.

8.25 JustPark is a major player in all forms of parking provision, leading a £50 billion industry into the digital age. It operates in the airport related car parking market, and has as its remit, amongst other factors, assisting hotels to maximise their revenue from their parking spaces by "*driving new customers to your car park and optimising your yield through dynamic prices.*" It operates for over 300 hotels in the UK, including the Marriott, Hilton, Premier Inn and Holiday Inn, managing their car parks more effectively, resulting in a 20% increase in parking revenue and a 96% customer satisfaction.

8.26 JustPark operates in the airport-related car parking market, and to appreciate the significance of this mode an exercise was undertaken searching for available car parking spaces within the immediate vicinity of LLA. These spaces were primarily on the private driveways of individual residential properties lying in close proximity to the airport, with the parking space required from 0400 hrs on 31st August 2023 to catch an early

morning flight, and leaving the vehicle at the same address until 2230hrs on 5th September 2023.

8.27 I have reproduced below a drawing indicating the availability and cost for a car parking space over the duration sought, from which the spread of available addresses is evident. A total of 186 individual addresses were available, with the cost ranging from £34.10 to £251.



8.28 I have previously indicated that LLA's pricing strategy has resulted in unintended consequences, with the cost of mid and long stay on-airport passenger products, resulting in parking in surrounding residential streets. The same conclusion is equally applicable in the event that Luton Rising seek to ensure that trips made by taxi and minicab cater for passengers both arriving and departing LLA.

8.29 An assessment of responses to airport related passenger car parking on the driveways of residential properties close to the airport involving one technological platform JustPark, reveals that in a number of cases the passenger either walked, or was driven to the airport by the property owner, or ordered a taxi/Uber to transport the customer either to or from LLA to the residential address where their car was kept for the duration of the passenger visit.

8.30 It follows that whilst the need to ensure that journeys made to and from the airport by taxi/minicab are efficiently organised in the sense of the taxi/minicab not remaining empty on a return trip for understandable reasons associated with sustainability considerations; the same process also results in unintended consequences for LLA. Firstly, this process results in a loss of revenue to the airport as a consequence of passengers parking their vehicles on the driveways of properties in surrounding residential areas at predominantly cheaper rates than that offered on-airport. Secondly, it assists those passengers who wish to rely on technological platforms such as JustPark to park their car on the driveways of residential properties, in the knowledge that the airport will be encouraging taxis/Ubers not to leave the airport without passengers. Thirdly, it actively encourages trips to and from the airport by taxi/Uber, with resultant consequences for congestion, carbon emissions and air quality considerations.

9.00 EXISTING AND PROPOSED AIRPORT RELATED PASSENGER CAR PARKING PROVISION

9.01 Table 2 overleaf examines existing and proposed airport related passenger car parking provision, commencing in column (1) with the proposed airport passenger car parking at London Luton Airport in 2028, taken from the Design & Access Statement accompanying Application No. 12/01400/FUL known as Project Curium, granted full planning permission on the 23rd June 2014.

TABLE 2

Existing and Proposed Airport Related Passenger Car Parking Provision

Category of Car Park	Proposed On-Airport Parking Spaces 2028 (1)	Post completion of MPT & 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**	**4,150**	**4,800**	**5,800**
Mid-Term	**2,513**	**1,668^**	**2,350 (1700 post-Luton DART Opening)**	**2,600**	**3,000**	**3,650**
Long-Term	**4,496***	**4,205<**	**4,500**	**4,675**	**5,400**	**6,550**
TOTAL	**10,709**	**9547**	**9,900 (post Luton DART Opening)**	**11,425**	**13,200**	**16,000**

Source:

(1) Table 5.1 Airport Passenger Car Parking – Design and Access Statement Planning Application 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 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"*.

(4) Table ES.1 Proposed Car Parking taken from Document [TR02001/APP/7.02] Transport Assessment – Part 1 of 4 and Table 8.2 Proposed Assessment Phased Car Parking Provision taken from Document [TR02001/APP/7.02] Transport Assessment – Part 2 of 4 (Revised Document AS-123).

(5) Table ES.1 Proposed Car Parking taken from Document [TR02001/APP/7.02] Transport Assessment – Part 1 of 4 and Table 8.2 Proposed Assessment Phased Car Parking Provision taken from Document [TR02001/APP/7.02] Transport Assessment – Part 2 of 4 (Revised Document AS-123).

(6) Table ES.1 Proposed Car Parking taken from Document [TR02001/APP/7.02] Transport Assessment – Part 1 of 4 and Table 8.2 Proposed Assessment Phased Car Parking Provision taken from Document [TR02001/APP/7.02] Transport Assessment – Part 2 of 4 (Revised Document AS-123).

***** 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.

9.02 Column (2) sets out the proposed passenger car parking at London Luton Airport in the period following completion of the Luton DART and Multi-Storey Car Park 2. It has been taken from Figure 2.2 Existing and Proposed Car Parking Provision contained in the Surface Access Strategy Report of 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 Multi Storey Car Park 2.

9.03 Columns (3) (4) and (5) are all taken from the same source, namely Table ES.1 found at page 5 of Document [TR020001/APP/7.02] Transport Assessment – Part 1 of 4 showing proposed on-airport passenger car parking throughput at 21.5mppa, 27mppa and 32mppa, consistent with the completion of Phases 1, 2a and 2b respectively of the current DCO application.

9.04 It should also be noted that where staff car parking was previously located on-airport within the Operational Area Boundary, it has been decanted outside the Operational Area Boundary of London Luton Airport, onto two separate sites east and west of the Luton Airport Parkway railway station. Car Park P1 is to comprise a new multi-storey to accommodate 1,000 car parking spaces for airport staff only, with Car Park P2 being a surface level car park previously used as a trailer park site occupied by HGV parking and coaches, again for staff car parking purposes only.

9.05 In this way, Car Parks P1 and P2 are reserved for staff parking to be provided in Phases 2a and 2b. These two proposed staff car parking sites lie in close proximity to Bartlett Square which was previously the subject of an application (Luton BC Ref. No. 18/00271/EIA) for "*combined-long/short/staff/mid stay car parks, car hire and valet*", despite an earlier proposal preventing the use of the same land for airport related car parking.

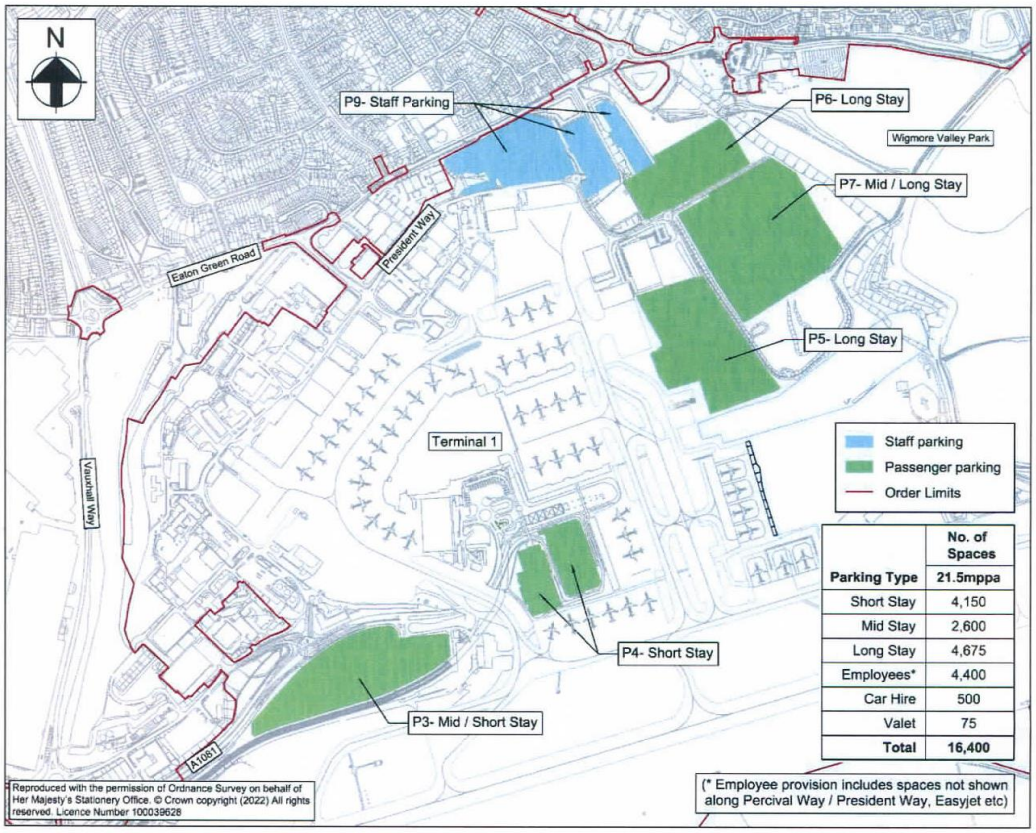
9.06 All future mid and long-stay on-airport car parks in Phases 1, 2a and 2b are required to have shuttle buses to transport passengers to the respective terminals, in the same way as is the case with the long term off-airport car parking site operated by Holiday Extras Limited at Slip End.

9.07 The locations of the various on-airport passenger car parking products over the three phases of the DCO application is based on information set out in Figure 8.8, Figure 8.9

and Figure 8.10 taken from Document [TR020001/APP/7.02] Transport Assessment – Part 2 of 4 (subsequently revised in Document AS–123) which are reproduced below.

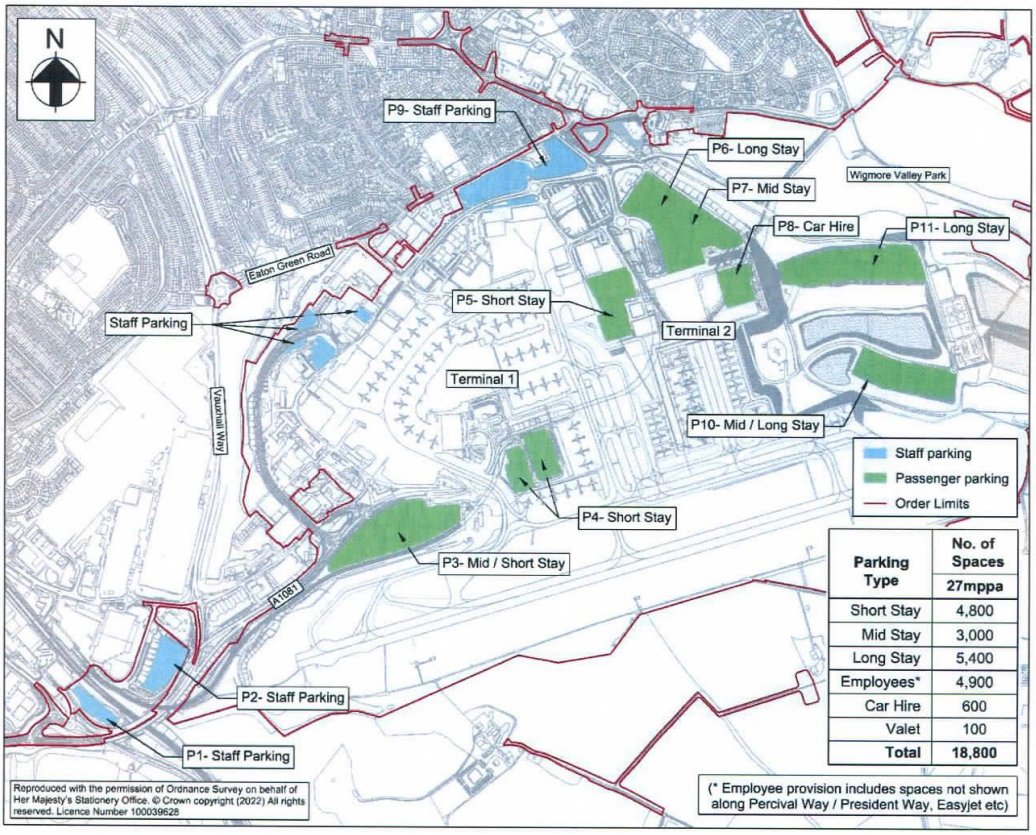
9.08 Short stay on-airport car parking in Phases 1 and 2a is provided in the Operational Area Boundary of the existing airport at Car Parks P3 and P4, the latter comprising two multi-stories. Increased provision for this parking product is provided in Phase 2a at a throughput of 27mppa on a new decked Car Park on land at P5, which itself results in a reduction in car parking capacity on the same land of 1,250 spaces, having previously been used in Phase 1 for long term passenger block parking, where approximately 2,450 spaces were available. In Phase 2b commencing in the first quarter of 2037, additional short stay car parking is provided in a new multi storey Car Park P12 lying outside the Operational Area Boundary of the existing airport providing approximately 2,225 car parking spaces to meet the needs of Terminal 2, but where it is also intended to be used for pick-up/drop-off use including valet parking.

Figure 8.8: Car Parking Proposals - Assessment Phase 1



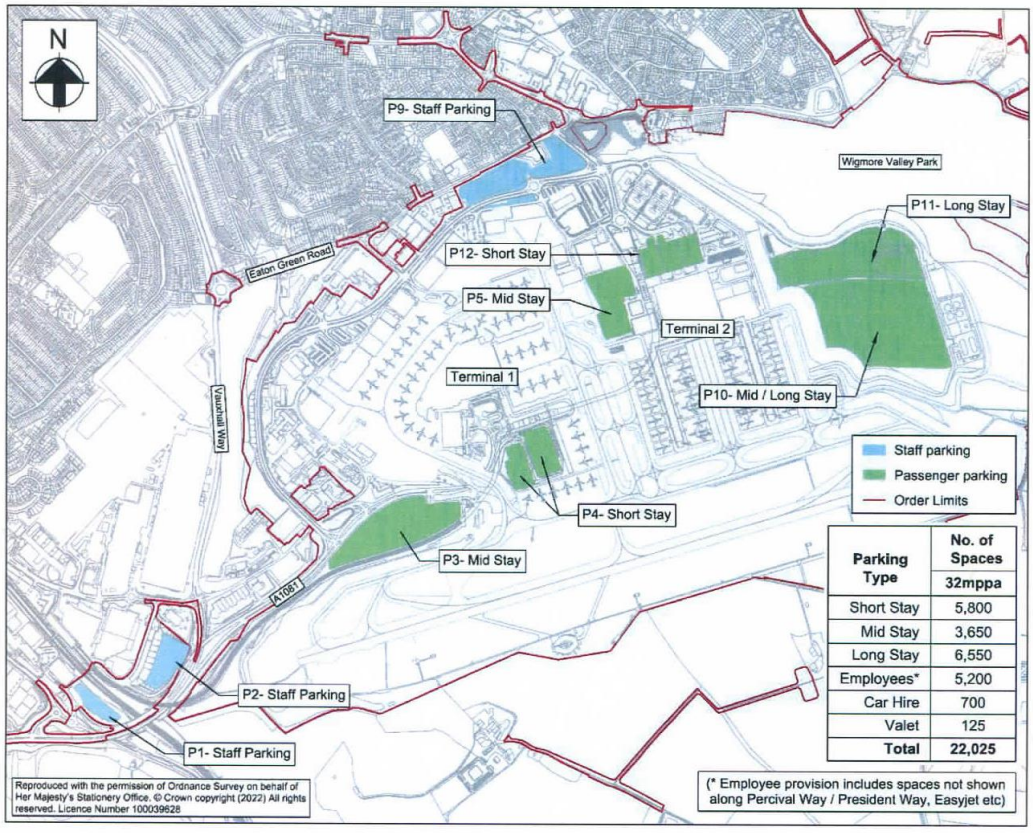
Parking Type	No. of Spaces 21.5mppa
Short Stay	4,150
Mid Stay	2,600
Long Stay	4,675
Employees*	4,400
Car Hire	500
Valet	75
Total	**16,400**

Figure 8.9: Car Parking Proposals - Assessment Phase 2a



Parking Type	No. of Spaces 27mppa
Short Stay	4,800
Mid Stay	3,000
Long Stay	5,400
Employees*	4,900
Car Hire	600
Valet	100
Total	**18,800**

Figure 8.10: Car Parking Proposals - Assessment Phase 2b



Parking Type	No. of Spaces 32mppa
Short Stay	5,800
Mid Stay	3,650
Long Stay	6,550
Employees*	5,200
Car Hire	700
Valet	125
Total	**22,025**

9.09 Mid stay on-airport passenger car parking during Phases 1 and 2a is provided on existing Car Park P3 within the Operational Area Boundary of the airport along with the short stay product. Car Park P7 constructed on land forming part of Wigmore Park, beyond the airport's Operational Area Boundary, is also used for mid stay on-airport passenger provision in Phases 1 and 2a. Car Park P7 fundamentally changes shape as a consequence of the construction of the second terminal, and the Green Horizons Park development, resulting in a loss of 1,860 spaces, from 3,090 to 1,230 over the two phases, having previously been used for long stay passenger parking in Phase 1. Two new Car Parks P10 and P11 to be used for mid and long stay car parking purposes are constructed on land beyond the Operational Boundary of the airport during Phase 2a, catering for 1,150 and 2,700 spaces respectively. In Phase 2b, mid stay passenger car parking is concentrated on Car Park P3; at Car Park P10 along with long stay, where the capacity is increased to 3,165 spaces, and on existing decked Car park P5 which accommodates 1,200 spaces.

9.10 Long stay on-airport passenger car parking in Phase 1 is retained on Car Park P5 as well as on extended Car Parks P6 and P7 beyond the Operational Area Boundary of the airport. In the same way as Car Park P7, Car Park P6 changes shape primarily as a consequence of the construction of the second terminal, and the Green Horizons Park development, being used for long stay purposes in Phases 1 and 2a, but altering from a self-park to a block parking format in Phase 2a with a resultant increase in capacity from 1,250 to 1,620 available passenger spaces. In Phases 2a, all long term on-airport car parking is provided outside the Operational Area Boundary of the airport on Car Parks P6, P10 and P11. Car Park P10 in Phase 2b is devoted to both mid and short stay passenger car parking being subsequently extended in Phase 2b to 3,165 spaces but where 505 spaces are also used for staff car parking. The capacity of Car Park P11 used for long stay purposes increases from 2,700 to 5,530 spaces in Phase 2b.

E. Conclusions on Airport Related Passenger Car Parking Provision

9.11 The following conclusions arise from the above exercise when analysed in conjunction with the contents of Table 2 and Inset Maps 4.10, 5.36 and 6.6 where they comprise part of Document TR00001/APP/5.02 Appendix 4.1 Construction Method Statement and Programme Report 2 *Assessment Phase 1, 2a and 2b Car Park Locations* (As Amended by Document AS-082).

9.12 There has been no material change in the number of short and long term on-airport passenger car parking spaces today, from that in evidence at the time Project Curium comprising part of Application No. 12/01400/FUL was submitted to Luton Borough Council in December 2012, more than a decade ago. The number of mid-stay on-airport passenger car parking spaces has declined today from the date of submission of same application as a consequence of the subsequent construction of the Luton DART linking the Airport to Luton Parkway railway station. The number of long-term on-airport passenger car parking spaces has remained static over the last 11 years at around 4,500.

9.13 These 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 to Application No. 21/00031/VARCON called in by the Secretary of State which sought variations to earlier conditions attached to Application No. 15/00950/VARCON, as well as accommodating a passenger throughput of 19mppa:

> *"7.32 The provision of available car parking at the airport is below that which was envisaged in the 2012 application and the rapid growth of the airport has resulted in a greater under provision of available spaces."*

9.14 This comment raised by Luton Borough Council in their Statement of Case concerning the called-in application relating to an expansion of LLA from 18mppa to 19mppa,is required to be seen in the context of both existing and proposed on-airport car parking spaces set out in Table 2 above, as well as in the light of the contents of paragraph 179 and 180 from Leading Counsel's closing submissions to the same called-in application, viz:

> *"179. As to parking for passengers, the Applicant operates four public car parks. Long Stay (4,151 parking spaces), Mid-stay (1,281), TCP1 (1,699), TCP2 (1,924). This totals 9,055 parking spaces. TCP2 opened in 2020 and created an additional 8% capacity.*
>
> *180. There is also offsite public car parking which is operated by third parties and which the Applicant does not control. As set out in the technical note, of these spaces 1,500 have been added since 2019. Operators of these car parks offer shuttle buses to and from the Airport."*

9.15 The 9,055 spaces mentioned by Leading Counsel in Closing Submissions on 22nd November of last year is not consistent with the figures set out in the earlier consultation exercises prior to the submission of the current DCO application, as can be noted in

columns (2) and (3) in Table 2. Significantly,it is clear that reliance was placed on third parties such as my clients to satisfy airport related passenger car parking requirements at LLA as recently as November 2022.

9.16 The DCO application reveals that from Phase 1 there is a requirement for the airport to use land outside its existing Operational Area Boundary to accommodate mid stay and long stay on-airport passenger car parking requirements, with further extensions westwards during Phases 2a and 2b. Short stay on-airport passenger parking also has to rely on land outside the existing Operational Area Boundary of the airport in Phase 2b.

9.17 No indication is given of how the number of on-airport passenger car parking spaces required at LLA at a passenger throughput of 21.5mppa, 27mppa and 43mppa has been calculated, including whether consideration has been given to the occupancy/demand ratio, being the number of cars wishing to park at LLA, and the volume of spaces required to service that demand on a monthly basis. What is apparent from the proof of evidence of Mr. J. Ojeil MSc(Eng) FRIHT MCILT in respect of the called-in application Reference No. 21/00031/VARCON is that the ratio of on-airport car parking supply per passenger at the levels quoted is considerably higher than comparable airports displaying similar leisure and business passenger profiles, confirming the conclusions raised by my client that the 16,000 spaces to be made available at a throughput of 32mppa in 2043 is considered to be insufficient.

9.18 My client would in any event dispute the figure provided by Mr J Ojeil of 1 space per 1,965 passengers which does not equate to a passenger throughput of either 18mppa or 19mppa. What is evident is the ratio of future on-airport car parking supply, even taking into account short-term provision, amounts to 1 space per 2,000 passengers given an expected 16,000 spaces at a throughput of 32mppa. This has to be compared with London Stansted Airport where on-airport car parking provision at the end of 2017 comprised 30,750 spaces at a passenger throughput of 25.9mppa or a ratio of 1 space per 842 passengers.

9.19 It is with these considerations in mind that increased importance should be afforded to companies such as my clients, in meeting any future shortfall in supply at London Luton Airport, irrespective of the interventions that are to form part of the GCG and the provisions of the FTP.

9.20 The 55% GCG Limit relating to the air passenger non-sustainable travel mode share at which time LLA is expected to be at full operating capacity, is equivalent to all non-sustainable travel by private car including taxis in 2043, at a passenger throughput of 32mppa. The 39% of passengers relying on private car to access the airport in 2043[17] is commensurate with 12.5 million passengers, being greater than the total passenger throughput at LLA eight years ago, placing into perspective the significance to be attributed to the 55% GCG Limit.

9.21 No study appears to have been undertaken of anticipated changes in customer behaviour where emphasis has been placed on customer profiling based on the popularity of certain destinations; flying frequency; trip duration and trip frequencies as part of a greater understanding of the cyclicality of passenger parking demand throughout the year.

9.22 The contents of Table ES.1 Proposed Car Parking in Document [TR02001/APP/7.02] Transport Assessment – Part 1 of 4, and Table 8.2 Proposed Assessment Phased Car Parking Provision taken from Document [TR02001/APP/7.02] Transport Assessment – Part 2 of 4 (as revised by AS-123), have been reiterated in columns 4, 5 & 6 of Table 2 accompanying these written representations. These figures are required to be considered in the light of Inset Maps 4.10, 5.36 and 6.6 where they comprise part of Document TR00001/APP/5.02 Appendix 4.1 Construction Method Statement and Programme Report 2 *Assessment Phase 1, 2a and 2b Car Park Locations* (as revised by AS-082).

9.23 This exercise reveals that in Phase 1 of the GDO application, at an anticipated passenger throughput of 21.5mppa, a total of 2,485 spaces comprises relocated mid and long stay car parking on Car Parks P6 and P7. Moving forward into Phase 2a, a further reconfiguration of the shapes and capacities of Car Parks P5, P6 and P7 arise, resulting in a total of 2,740 spaces being lost when compared with the same car parks present at the earlier Phase 1. It is relevant to highlight that these spaces do not comprise additional on-airport provision.

9.24 It is important when considering the intended use of on-airport car parks for short, mid and long-term passenger parking purposes, to have regard to the same Inset Maps, to the

[17] 39% figure is derived from Table 9.5 Passenger Mode Split (Person's Trips) as set out in Document 7.02 Transport Assessment – Part 2 of 4 (Chapters 5-8) *amended by AS-123))(made up of all private car modes and rental car but not taxis)

extent that they confirm that the entirety of certain car parks are not devoted to on-airport passenger car parking purposes. By way of example, Car Park P7 at a passenger throughput of 21.5mppa is not used solely for mid and long stay, whether in terms of either new or relocated provision, but is to cater for relocated car hire and for new employee car parking. In a similar vein, Car Park P10 in Phase 2b at a throughput of 32mppa reveals a capacity of 3,165 spaces, of which 700 spaces are to be used for car hire purposes and 505 spaces for staff. In the case of staff car parking, this is in addition to the staff car parking amounting to 1450 spaces to be provided on land currently off airport to the east and west of Luton Parkway railway station in Phase 2a.

9.25 These figures aside, an important attribute of long term off-airport car parking companies of the type run by Holiday Extras Ltd, operating from lawful sites in the vicinity of LLA, extends beyond issues of airport related car parking demand and supply, or ratios of car parking supply to passenger throughput. Facilities such as that provided at Slip End, ensure a choice for passengers where otherwise passenger related car parking would be dominated by the airport company, with an absence of competition available to recipients of the same use.

9.26 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 noteworthy.

> "*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 in granting access to facilities needed by their rivals.*" (my emphasis)

10.00 PROFILING OF PASSENGERS USING THE LONG TERM OFF-AIRPORT CAR PARKING SITE AT SLIP END

10.01 Detailed figures have been provided by Holiday Extras Ltd covering a calendar year from 11th August 2022 to 10th August 2023, in which the ten most frequent UK postcode bookings of passengers arriving at Slip End Luton between 0000hrs and 0900 hrs have been analysed, and then ranked in descending order by country destination. The

resultant matrix is provided at Table 3 overleaf in which the ten most frequent UK postcode booking are given a colour coding. This is to differentiate the top ten most frequent UK postcodes, from other UK postcodes, which although appearing in the top ten, comprise less frequent booking locations. Table 4 also found overleaf is the result of a similar exercise over the same time period in which the top 10 most frequent UK postcode bookings of passengers departing Slip End between 2200hrs and 0400 hrs have been ranked in descending order by country of departure.

10.02 The highest ranked of the ten most frequent postcodes appear in the first row, with the remaining nine postcodes ranked in descending order in the remaining nine rows under each country. For example, Table 3 reveals that the highest ranked UK postcode of passengers who arrive at Slip End Luton between 0000 hrs and 0900 hrs over the 12 month calendar period and who departed for Poland had a Northampton postcode (NN), with the second highest ranked UK postcode being Reading (RG), and so on until the tenth highest ranked postcode for passengers leaving the country for Poland is shown as having a booking address in Southall (UB). The same exercise was carried out to produce Table 4, which again reveals the ten highest ranked postcodes in respect of those passengers who arrived at Slip End between 2200hrs and 0400 hrs during the same calendar year ranked in descending order by country of departure.

10.03 The salient issues to be derived from Table 3 is that there is preponderance of passenger bookings occupying the highest ranked positions having a postcode NN (Northampton); PE (Peterborough); LE (Leicester) and MK (Milton Keynes), and this grouping is evident amongst a number of countries. These passenger bookings are able to take full advantage of the M1 Motorway as well as Class A roads orientated in a north-easterly direction from Luton, offering convenient and quick journey times which as explained later, are commensurate with locations which are not immediately accessible by public transport, particularly in the early hours of the morning or late at night.

10.04 The matrix at Table 3 reveals that those passenger bookings having an OX or RG postcode (Oxford and Reading) lying to the west of LLA are similarly not able to rely on accessible public transport, especially where early morning departures are required or aircraft landings take place late at night. Passengers living in these postcodes are able to take advantage of the quick, easy and convenient access via the M1, M25 and M4 Motorways, or take advantage of major but less busy routes cross country. These two

TABLE 3 - The 10 Most Frequent UK Postcode Bookings of Passenger Arriving at Slip End, Luton between 0000hrs and 0900hrs During the Calendar Year from 11.08.2022 to 10.08.2023 Ranked in Descending Order by Country Destination

Poland	Spain	Romania	Lithuania	Portugal	UK	Netherlands	France	Greece	Italy	Hungary	Bulgaria	Ireland	Albania	Latvia	Switzerland	Iceland	Turkey	Cyprus
NN	NN	NN	PE	NN	HP	NN	LE	NN	NN	NN	PE	HP	RM	NN	NN	LE	PE	NN
RG	MK	RM	NN	MK	MK	PE	NN	LE	MK	OX	LE	MK	OX	PE	OX	NN	LE	LE
OX	HP	HA	RM	LE	NN	MK	PE	MK	LE	RG	CV	HA	NN	CV	LE	PE	NN	PE
CV	PE	RG	NG	HP	SG	LE	CV	PE	HP	CV	NG	NN	CV	OX	MK	NG	MK	MK
SO	SG	CV	PO	OX	RG	HP	NG	HP	PE	MK	NN	WD	EN	SO	PE	CV	NG	EN
TW	OX	PE	TW	PE	PE	OX	HP	OX	NG	GU	RG	SG	SE	RG	HP	MK	HP	HP
SL	LE	BS	UB	CV	OX	SG	MK	SG	CV	HP	PO	OX	N1	MK	CB	CH	HA	NG
PE	WD	OX	RG	WD	WD	CT	OX	CV	SG	PE	OX	NW	NG	LE	CV	RG	CT	CT
LE	RG	LE	DA	RG	HA	HA	SG	NG	OX	LE	HE	SL	LE	TW	NG	OX	SG	SG
UB	CT	ME	MK	HA	AL	RG	CT	NR	CT	NG	CT	RG	DE	CT	SG	NR	DE	NR

Egypt	Croatia	Serbia	Israel	Malta	Moldova	Morocco	N.Macedonia	Czech Rep	Germany	Slovenia	Bosnia/Herz	Austria	Jersey	Estonia	Norway	Jordan	Tunisia	Montenegro
PE	NN	NN	NN	NN	NN	NN	OX	PE	NN	CV	LE	SG	NN	NN	DE	LE	TW	E1
NN	LE	UB	N1	LE	RM	LE	RG	NG	LE	NN	NG	CV	PE	LE	CV	SN	N2	
LE	OX	NW	HA	PE	LE	PE	PE	LE	MK	PE	NN	NN	SG	TW	BS	TS		
MK	CT	RM	LE	MK	CV	MK	SW	CT	CT	CB	PE	HP	MK	PE	CT	TQ		
HP	PE	LE	CT	NG	ME	CV	HP	MK	SG	NG	DE	OX	HP	GU	ST	SL		
NG	MK	TW	NN	SG	RG	HP	UB	DE	CV	LN	HP	RG	LE	OX	SL	S3		
RM	CV	RG	WD	CV	TW	CT	NW	NN	NG	OX	TW	NG	IP	ME	RG	PO		
WR	SG	N1	SE	RG	IG	UB	LE	CV	WD	MK	CB	LE	CB	LU	MK	OX		
IP	NG	KT	OX	HA	E1	HA	SN	UB	OX	CT	B1	SL	EN	HP	LE	HP		
CV	HP	CT	IG	RM	GU	DE	SL	E6	LU	TW	SW	PE	CM	CV	IP	GU		

TABLE 4 - The 10 Most Frequent UK Postcode Bookings of Passenger Departing Slip End, Luton between 2200hrs and 0400hrs During the Calendar Year from 11.08.2022 to 10.08.2023 Ranked in Descending Order by Country of Departure

Poland	Spain	Romania	Lithuania	Portugal	UK	Netherlands	France	Greece	Italy	Hungary	Bulgaria	Ireland	Albania	Latvia	Switzerland	Iceland	Turkey	Cyprus
NN	NW	NN	PE	NN	HP	NN	NN	NE	NN	NN	PE	MK	RM	NN	NN	LE	NN	NN
RG	MK	RM	NN	MK	MK	PE	LE	MK	MK	GU	OX	HP	OX	PE	LE	PE	PE	PE
OX	HP	HA	RM	LE	NW	MK	CV	LE	NG	OX	RG	NN	NN	CV	PE	NN	MK	LE
SL	PE	RG	NG	OX	SG	HP	PE	HP	LE	CV	LE	WD	N1	MK	OX	NG	LE	SG
CV	SG	CV	TW	HP	RG	LE	HP	PE	CV	RG	ME	HA	EN	RG	HP	MK	HP	MK
TW	OX	PE	PO	CV	HA	OX	MK	CT	HP	KT	NN	SG	SE	SO	CV	CV	OX	NG
SO	LE	ME	DA	WD	PE	EN	NG	OX	PE	HA	CV	OX	IG	DE	CB	NR	CV	CP
LE	RG	OX	MK	RG	WD	CT	SG	NG	OX	HP	N1	NW	CV	OX	NG	DE	NR	EN
UB	CV	LE	RG	PE	OX	SG	OX	CV	SG	NG	GU	RG	LE	TW	SG	SG	SG	CV
MK	CT	TW	ME	NG	BT	NG	NR	SG	DE	SO	NG	AL	TW	SL	MK	CM	CT	CT

Egypt	Croatia	Serbia	Israel	Malta	Moldova	Morocco	N.Macedonia	Czech Rep	Germany	Slovenia	Bosnia/Herz	Austria	Jersey	Estonia	Norway	Jordan	Tunisia	Slovakia
PE	NN	NN	NW	NN	NN	LE	PE	NN	NN	PE	PE	IP	MK	GU	TF	RG	PE	NN
NN	LE	RM	HA	LE	RM	NN	OX	NG	MK	CB	OL	SM	CB	SW	SW	CT	NN	GU
LE	OX	TW	N1	MK	RG	MK	RG	LE	LE	WR	W5	SG	PE	LE	S1	LE	CT	RG
MK	CV	NN	CT	DE	ME	PE	NG	CV	SG	UB	TW	NN	OX	KT	N1	CF	SG	CV
CV	NG	LE	LE	PE	LE	SG	HP	RG	OX	TW	SN	KT	RM	CV	B4	SW	NG	OX
NG	CT	UB	WD	SG	IG	NG	KT	PE	CV	SS	OX	HP	NN	WD		PE	IP	SN
HP	CB	SN	NW	NG	BS	CT	BN	OX	CT	SP	NN		HP	TW		BS	HP	SO
IP	HP	RG	IP	N2	CV	HP	CF	WD	NG	SG	NG		TS	SN		B1	RM	LE
DE	PE	SE	BS	CV	TW	CV	SL	SG	WD	NN	HP		NR	OX		SE	MK	RM
NR	DE	N1	NG	RG	PO	HA	TW	PO	PE	MK	HA		NG	NN		NW	LE	DE

postcodes are ranked lower and have a more diverse spread than those relating to NN, PE, LE and MK. A similar situation exists with passenger bookings from NG (Nottingham), which in a similar way to OX and RG postcode bookings, has a diverse distribution in Table 3, being ready accessible to the M1 Motorway, where public transport is less frequent than is the case with Leicester or Milton Keynes.

10.05 The lowest of the ten top ranked UK postcode bookings in Table 3 is CT (Canterbury), and like the OX and RG postcode bookings it enjoys a diverse distribution albeit occupying lower positions in the top ten ranked UK postcodes. The same postcode is replaced in Table 4, with the lowest ranked of the top ten UK postcodes being SG (Stevenage).

10.06 It can also be seen that those UK postcodes which in terms of passenger bookings are ranked outside the top ten in Table 3, and hence have no colour coding, represent particularly diverse locations. Passenger bookings residing in these UK postcodes do not enjoy direct public transport access to LLA. In the event that the same passengers were to depend on public transport it would involve multiple interchanges, with no services available in the early hours of the morning to access LLA, or late at night to allow the passenger to arrive home at a reasonable time.

10.07 It can be seen in Table 3 that in the case of passenger bookings departing for countries in Eastern and Central European, a wide variety of geographical locations occur in the top ten ranked UK postcodes, even though they do not represent the most frequent passenger booking locations. This point is illustrated in Table 3 by Lithuania where the top ten UK ranked postcode bookings which are not colour coded comprise RM (Romford), PO (Portsmouth), TW (Twickenham), UB (Southall) and DA (Dartford).

10.08 Turning to Table 4, whilst a pattern can be identified in which the same top four ranked postcode bookings NN, PE, LE and MK can be identified in a similar way to the results in Table 3, their dominance at the top of the hierarchy is not so immediately apparent. The Oxford (OX) and Reading (RG) postcode bookings have a particularly diverse spread over the ten top postcodes, being similar to that reflected in Table 3, a feature which also extends to NG (Nottingham). In a similar way to CT (Canterbury) in Table 3, SG (Stevenage) tends to occupy the lower rankings of the ten top UK postcode bookings in Table 4, even though it situated closer and more accessible to LLA than Canterbury.

10.09 A more diverse arrangement of less frequent UK postcode bookings, i.e. those not colour coded, occupy the top ten in Table 4, compared with Table 3. To illustrate this point, passengers arriving at Slip End between 2200 hrs and 0400 hrs from Slovenia reveal UK postcode bookings in the top ten to include (CB) Cambridge), WR (Worcester), UB (Southall, TW (Twickenham) SS (Southend-on-Sea), and SP (Salisbury), albeit none of these postcode bookings represent the most frequent postcode bookings. Passengers arriving at Slip End between 2200 and 0400 from Israel reveal only three postcode bookings within the top ten most frequent UK bookings, with the remainder including NW (North West London), HA (Harrow), N1 (North London), CT (Canterbury), WD (Watford), IP (Ipswich) and BS (Bristol).

10.10 The top ten UK postcode bookings of passengers arriving at Slip End between 0000hrs and 0900 hrs during the calendar year from 11 August 2022 to 10 August 2023 ranked in descending order beginning with the most frequent were as follows:

1. NG (Nottingham)
2. LE (Leicester)
3. PE (Peterborough)
4. MK (Milton Keynes)
5. OX (Oxford)
6. CV (Coventry)
7. NG (Nottingham)
8. HP (Hemel Hempstead)
9. RG (Reading)
10. CT (Canterbury)

10.11 The top ten UK postcode bookings of passengers departing Slip End between 2200hrs and 0400 hrs during the calendar year from 11 August 2022 to 10 August 2023 ranked in descending order beginning with the most frequent were as follows:

1. NN (Northampton)
2. LE (Leicester)
3. NG (Nottingham)
4. PE (Peterborough)
5. CV (Coventry)
6. OX (Oxford)
7. MK (Milton Keynes)
8. HP (Hemel Hempstead)
9. SG (Stevenage)
10. RG (Reading)

10.12 Consideration has been given to journeys made by public transport and private car to the top five ranked UK postcodes of passenger bookings derived from two matrices comprising Tables 3 and 4, in order to provide an understand of journey routes and duration by public transport and private car. A detailed assessment has been undertaken of the quickest route by public transport in the case of an early morning departure flight from LLA, which would necessitate passengers arriving at the airport two hours in advance of the flight time, i.e. by at latest 0400 hrs for a 0600 hrs flight. The public transport journey selected has been the shortest in terms of duration, with the least wait time prior to the opening of the terminal, and therefore may involve bus or train modes, or combinations of the two, including walking between transport interchanges. A comparison with journeys by private car has been undertaken to assess the duration of the journey trip from the same UK postcodes passenger bookings.

10.13 Table 5 overleaf is a comparison of journey routes, times and duration by public transport and private car associated with the top five most frequently ranked UK postcodes derived from the contents of Tables 3 and 4 of passenger bookings over a calendar year period at Slip End. It is clearly evident that in the case of the top five most frequently ranked UK postcodes, journey times by private car are appreciably less than the shortest journey duration by public transport, even allowing for an extra 30 minutes for the transfer of passengers at Slip End by coach to LLA and vice versa.

10.14 Table 5 also reveals that for passengers wishing to arrive at LLA by 0400 hrs to take a flight at 0600hrs, necessitates in a number of cases a long wait at the airport for the check-in desks to open. In this regard it can be seen that in order for a passenger from Leicester to arrive before 0400hrs necessitates taking a train at 2236 hrs to arrive at 0041 hrs, or alternatively take a coach at 2354 to arrive at 0153 hrs. Either way, the passenger is required to wait a minimum of 2 hrs for the check-in desk to open, having already endured a journey of 2hrs 05 min or 1 hr 59 mins.

10.15 The same situation regarding journey times from Peterborough is worse in that the passenger is required to embark on a journey of over 3 hrs duration with two changes, before having to wait more than an hour for the check-in desk to open. To reach his destination in the case of the departure by train at 2313 hrs involves alighting at Finsbury Park, walking to Finsbury Park bus station, taking a bus to Brent Cross Station, walking to Brent Cross Centre before taking a coach to LLA bus station.

TABLE 5

A Comparison of Journey Routes, Times and Duration by Public Transport and Private Car of the Top Five Most Frequently Ranked UK Postcodes Taken from Tables 3 & 4

		Required Arrival Time at LLA			Departure Time from LLA		
Top 5 Ranked UK Postcodes		**Public Transport**		**Private Car**	**Public Transport**		**Private Car**
NN (Northampton)	Departure Time	2311 hrs	0018 hrs	0245 hrs*	2341 hrs	0116 hrs	2200hrs
	Arrival Time	0153 hrs (2)	0243 hrs (0)	0400 hrs	0111 hrs (0)	0246 hrs (0)	2318 hrs**
	Journey Duration	2 hr 42 mins	1 hrs 25 mins	48 mins	1 hr 30 mins	1 hr 30 mins	48 mins
LE (Leicester)	Departure Time	2236 hrs	2354 hrs	0204 hrs*	2211 hrs	2256 hrs	2200 hrs
	Arrival Time	0041 hrs (1)	0153 hrs (0)	0400 hrs	0000 (2)	0100hrs (0)	2356 hrs**
	Journey Time	2 hrs 05 mins	1 hr 59 mins	1 hr 26 mins	1 hr 49 mins	2 hrs 04 mins	1 hr 26 mins
PE (Peterborough)	Departure Time	2313 hrs	2352 hrs	0210 hrs*	2211 hrs	2221 hrs	2200 hrs
	Arrival Time	0220(2)	0256 hrs (2)	0400 hrs	0022 hrs (2)	0113 hrs (3)	2333 hrs
	Journey Duration	3 hrs 07 mins	3 hrs 04 mins	1 hr 13mins	2 hrs 11 mins	2 hrs 32 mins	1 hr 13 mins
MK (Milton Keynes	Departure Time	0007 hrs	0030 hrs	0254 hrs*			
	Arrival Time	0220 hrs (2)	0243 hrs (1)	0400 hrs			
	Journey Duration	2 hr 13 mins	2 hr 13 mins	36 mins			
NG (Nottingham)	Departure Time				2211 hrs	2256h rs	2200 hrs
	Arrival Time				0032 hrs (2)	0158 hrs (0)	0019 hrs**
	Journey Duration				2 hrs 21 mins	3 hrs 02 mins	1 hr 49 mins
OX (Oxford)	Departure Time	2312 hrs	0040 hrs	0312 hrs*			
	Arrival Time	0220 hrs (1)	0248 hrs (0)	0400 hrs			
	Journey Duration	3 hrs 08 mins	2 hrs 08 mins	1 hr 18 mins			
CV (Coventry)	Departure Time				2201 hrs	0006 hrs	2200 hrs
	Arrival Time				0129 (2)	0151 hrs (0)	2351hrs**
	Journey Duration				3 hrs 28 mins	1 hr 45 mins	1 hr 21 mins

Source: www.travline-northeast.co.uk and www.theaa.com

* The departure time from the UK postcode booking includes an additional 30 mins to allow transfer of passengers from Slip End to LLA, even though Slip End is nearer to Junction 10 of the M1 Motorway than LLA.

** An additional 30 mins has been added to the arrival time to allow passengers to be transferred from LLA to Slip End private car trip

Nottingham and Coventry do not appear in the top 5 most frequently ranked postcodes for passengers in Table 3 but they do feature in the top five postcodes in Table 4. Similarly, Milton Keynes and Oxford do not figure in the top 5 most frequently ranked postcodes for passengers in Table 4, but they do feature in the top 5 postcodes in Table 3

The journey durations for public transport and the private car are assessed from LLA to the centre of the particular destination. The figures do not take into account the extra journey time required from the central node to the passenger's home address.

11.00 CONCLUSIONS

11.01 These representations have shown that into the foreseeable future there will continue to be a sizeable proportion of passengers accessing LLA by private car, irrespective of the well-conceived interventions encompassing GCG and the FTP. Whilst capacity issues seen in the context of the local and strategic highway network, as well as from a public transport perspective are relevant; equal weight has to be placed on the age profiles of passengers particularly whether they involve persons with a mobility impairment or where young children are involved; and the socio-economic group to which they belong. Those competing airports with similar leisure and business passenger profiles which have overlapping catchment areas are relevant as is the need to offer passenger choice in airport related car parking products.