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[redacted]

Summary of 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. Holiday Extras are a leading UK distributer of on and off airport related car parking spaces. Their 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 LLA. The total number of car parking spaces available at Slip End varies between 3,500 and 5,500 spaces, being dependent on marketing conditions which dictates the extent to which customers' vehicles are either self-parked or block parked.

2. There are a wide number of factors over which Luton Rising have little influence over airport-related car parking demand, dealing with the capacity of an airport and issues surrounding customer choice and behavioural considerations; both of which require above all a flexible approach to be taken to airport related parking demand and supply. This is particularly apposite when considering the fact that the DCO application is programmed to take place over 16 years construction period.

3. Surface access considerations are required to be differentiated from the Framework Travel Plan (FTP), and Limits and Targets set out in the Green Controlled Growth (GCG) programme. In terms of surface access, limits are sought to control changes in mode share, comprising maximum percentage mode shares for both "*non-sustainable*" passenger travel and, "*non-sustainable*" staff travel, which are not to be exceeded. My clients feel there is a conundrum regarding the definition of "*passenger non-sustainable travel*" as part of "*an unsustainable mode*".

4. These representations explore more sustainable approaches to surface access and in particular the benefits of a satellite long term off-airport car parking site. Previous discussions were held with representatives of LLAL over the provision of a satellite facility of this nature to be run jointly by both parties as part of a future DCO application. No reasons were given as to why these discussions came to an abrupt end. The opportunity of providing a satellite off-airport car parking facility has not been given serious consideration as part of the current DCO proposals. This is regrettable in the light of consultation responses from local residents where the response from the applicant is considered to be opaque. Above all, it represents a loss of an opportunity, especially when similar options have been explored at other UK airports.

5. It is contended that there are distinct advantages in pursuing this option, with more efficient use being devoted to the local highway network, reduced congestion and less overall vehicle mileage, being a benefit to both customers and the airport owner alike. Car parking charges have an important role to play but there is no reason why a clear framework cannot be set governing the setting and varying of charges at such a site.

6. The FTP has been considered, but no account has been taken of the contribution made by long term off-airport car parking uses in contributing to the sustainability objectives of LLA.

7. Travel Plans are to contain the results of on-going monitoring at the same time considering 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, but no role has been set aside for Holiday Extras, the largest private long term off-airport car parking operator serving LLA as part of this process. There are a number of interventions and measures set out in the FTB concerning "*vehicle access, parking, private hire vehicles and taxis*" which have implications and are pertinent to the running of a long term off-airport car parking business. The uptake of electric and low emission vehicles are measures supported by my clients but which it cannot be fully quantified as Holiday Extras Limited's presence is excluded from any discussions in the formulation of Travel Plans.

8. Careful consideration has been given to the Green Controlled Growth Framework where it is directed at surface access in which various limits and thresholds surrounding future growth at LLA are considered in the context of surface access. The extent to which this instrument will ensure the sustainable growth of LLA is largely 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. It is apparent that in the case of Level 1 and 2 Thresholds, that growth may continue to take place. The process of planned capacity reduction and impact on slot allocation where a Limit has been breached and the resultant mitigation not successful, does not appear to have been fully considered. There is insufficient diversity in the nature of those representatives on the Environmental Scrutiny Group which does not include any private organisations with surface access car parking interests. This is despite the Panel accepting that "*not all of the organisations listed above have this in-house capacity.*"

9. Passenger modal share considerations have been considered in these written representations, from which six factors can be discerned.

- Firstly, public transport modal share is largely dependent on non-UK business and leisure passengers.

- Secondly, in terms of UK based leisure and business travel, a combination of the availability and frequency of public transport services found within a short distance of a passenger's home, along with whether interchanges are necessary as part of a journey to or from the selected airport strongly influences modal choice.

- Thirdly, those passengers relying on early morning departure flight times will factor into their modal choice, price considerations and competing airports offering equivalent destinations. "*Lead time" and "lag time*" are also important, as is flight price, and the nature of the airline/holiday company. Above all, appeal decisions have highlighted the need for customer choice in airport related car parking products.

- Fourthly, there will always be passengers who will continue to choose to travel to and from an airport by private car, being those with mobility impairment; those households living in destinations not well served by public transport, and large groups including families with children.

- Fifthly, consideration particularly during Phases 1 and 2a should be given to Government policy in that this period of construction will coincide with a time when 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.

- Sixthly the greatest distribution of additional passenger loadings over each phase of the DCO application is in locations 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.

10. These written representations have assessed the *impacts of the least sustainable trips to LLA*. It has been demonstrated that "*drop-off*" and "*kiss-and-fly*" modes involving a doubling of trips to the airport has not been grappled with in the submission of the DCO application, representing the least sustainable means of passenger access to LLA. It has been shown to be counter-intuitive to set up a charging mechanism at the airport's car parks which on the one hand seeks to discourage the "kiss-and- fly" mode, whilst on the other, simultaneously propose a steep increase in the number of drop off and taxi spaces to be provided over the three phases of the DCO application. The management of vehicle demand through the use of access and parking choices, whilst seen as a key component in incentivising sustainable modes, has given rise to unintended consequences in terms of parking in surrounding residential streets.

11. Importantly, all the proposed interventions and measures require funding to support both capital and operating costs, and no framework forms part of the DCO application which assesses the costs and benefits of these surface access interventions, so ensuring investment decisions maximise the opportunity of reaching set targets, seen in terms of the choice of modal access share generally.

12. Capacity issues whether associated with public transport on the surrounding highway network, whilst relevant, are only part of those primary considerations relating to modal choice. It has been demonstrated that only a limited increase in bus/coach modal share is expected over the 16-year construction period associated with the DCO application, particularly when compared with London Stansted Airport which reveals a comparable passenger profile. Rail modal share, whilst increasing by 10% between 2012 and 2043, has to be compared with the least sustainable modes of trip to the airport and the substantial increase in passenger throughput over the same time period. It is my client's view that sufficient disincentives are not being put in place to restrict "*kiss and fly*" and *drop-off*" modes. In this respect the FTP is seeking to encourage more efficient use of taxi and private hire trips.

13. There has been no examination of airport related car parking at hotels/guest houses and the significance attached to Transportation Network Companies has not been fully explored, despite the fact that TNCs generate substantially less revenue per passenger than on-airport parking, taxis and rental cars, effectively cutting into the airport's income stream, a matter evident from information set out in the London Heathrow Surface Access Proposals dated June 2019.

14. These written representations have also examined the rise in importance of technological platforms which have as their mission to transform the way drivers look for parking spaces, whilst delivering cash to home owners who rent out their driveways, enabling other businesses such as hotels to maximise their income from airport related car parking. An exercise has shown the considerable number of car parking spaces available on driveways in residential streets lying in close proximity to LLA from just one operator, JustPark. Unintended consequences for LLA are likely to arise from ensuring that taxi/minicabs do not leave the airport empty, since this is likely to have an impact on passenger choice in terms of those who prefer to use the driveways of properties in neighbouring residential streets to part their car whilst away on trips.

15. A detailed assessment has been undertaken of existing and proposed airport-related passenger car parking provision on land at LLA, and this has been analysed in the context of the proposed expansion of the Operational Area Boundary of the airport over the three phases of the DCO application.

16. A number of conclusions arise from this exercise, from which it can be seen that 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 of Project Curium was submitted to the Local Planning Authority in December 2012, more than a decade ago. The number of mid-stay on-airport car parking spaces the have declined today, as a consequence of the construction of the Luton DART.

17. The Local Planning Authority as part of their Statement of Case relating to the proposal to increase passenger throughput from 18mppa to 19mppa have accepted that the provision of available car parking at the airport is below that which was envisaged in the 2012 application, with the rapid growth of the airport having resulted in a greater under-provision of available spaces.

18. Uncertainty surrounds the number of on-airport car parking spaces at LLA, between earlier documents leading up to the DCO application and what was stated at the time of the called-in application relating to the 1mppa increase in passenger growth. What is apparent is that compared with London Stansted Airport which has a similar passenger profile, the ratio of car parking spaces for passengers is far lower. It is considerations of this kind that have led to increased importance being afforded to companies such as my clients in meeting any future shortfall in supply at LLA.

19. No study appears to have been undertaken of anticipated changes in customer behaviour, where emphasis has been placed on customer profiling based on 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.

20. An assessment of the profiling of passengers using the long term off-airport car parking site at Slip End has been carried out over 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 0000 hrs and 0900 hrs have been analysed and then ranked in descending order by country destinations. A similar exercise over the same time period has been undertaken of those postcode bookings of passengers departing Slip End between 2200 hrs and 0400 hrs. The results have been provided in two matrices in which the ten most frequent postcodes appear in respect of the country destination or country of departure.

21. The results of these two matrices reveal a preponderance of passenger bookings occupying the highest ranked position having a postcode NN (Northampton), PE (Peterborough), LE (Leicester) and MK (Milton Keynes). A more diverse distribution is evident in respect of passenger bookings from OX (Oxford) RG (Reading) and NG (Nottingham). The same tables show a wide geographical distribution of different postcode bookings, which do not appear in the top ten most frequent UK postcode bookings particularly in respect of certain Eastern and Central Europe,

22. A comparison has been undertaken of journey routes, times and duration by public transport and private car associated with the top five more frequently ranked UK postcode bookings derived from Tables 3 and 4, in which difficulty in accessing the airport has been highlighted, particularly in the early mornings, with the duration of trips by public transport being far in excess of that by private car.