

SLAE Written Representation Submission for Deadline 10 - Sustainable Transport Fund (STF) & Residual Impacts Fund (RIF)

Note: this submission is over 2,000 words replication of the applicants' statements are included for ease of reference. SLAE Responses total less than 2,000 words.

003048-8.185 Alternative Mechanisms to the Section 106 Agreement

Schedule 8 – TRIMMA, Residual Impact Fund.

It should be noted that the Applicant is considering, in any event, whether the RIF commitment should sit within the DCO even in circumstances where a section 106 agreement is concluded. This will be resolved as part of ongoing discussions with the Host Authorities and a final decision will be presented at Deadline 11.

SLAE Response

By presenting at Deadline 11 this does not give any interested parties the chance to respond. It is against the spirit of paragraph in the Examiners letter 002930-LUTN-Rule-8_3-26-Jan-2024 where the 'ExA would like to take this opportunity to remind all parties of the importance of timely submissions in accordance with the revised Examination Timetable to enable a full and fair examination of the proposal.'

003034-8.119 Sustainable Transport Fund

2.2.3 No levy will apply to staff parking, to avoid any potential for fly-parking on roads around the airport, adversely affecting local communities

SLAE Response

Any charges to staff for parking will encourage fly-parking. Do LR or LLAOL charge staff for parking and if so, what are the charges?

2.3.12 Feedback from engagement with relevant highway authorities has raised the potential need for the fund to be of a sufficient size in the early years to enable investment opportunities in new bus routes (subject to evidenced proposals and ATF Steering Group approval).

SLAE Response

The key word here is 'new' and not new bus routes at the expense of existing bus routes.

2.3.13 If the first Travel Plan demonstrates a need for early funding, in excess of the initial revenues of the STF being available or sufficient for the purpose, then the Applicant will make available up to £1,000,000 to 'pump-prime' the fund.

SLAE Response

Where does the £1,000,000 come from? Is this fund taken from the RIF?
Does this mean that the RIF fund is £1,000,000 and STF is also £1,000,000?

2.3.14 If there is any surplus revenue (i.e. any uncommitted funds remaining) at the end of any anniversary of the inception of the STF, up to 25% of this surplus may be redistributed (upon the

recommendation of the ATF Steering Group) to Community First, the Community Fund or the Residual Impacts Fund. Redistribution to the Residual Impacts Fund will be on the condition that the RIF has been exhausted at the time of redistribution.

SLAE Response

Is the assumption that any Controlled Parking Zone costs are addressed before any surplus is redistributed?

2.3.15 If there is a surplus upon any anniversary following the throughput of passengers at the airport exceeding 31.5 mppa, the ATF Steering Group may recommend to the operator that levies be reduced or removed as appropriate. Proposed ATF and ATF Steering Group membership (one representative from each body)

SLAE Response

Why is there no representative for residents of airport adjoining wards on the ATF and steering group?

Particularly when fly-parking associated with airport users is covered in multiple documents and governed through Steering Groups within the Airport Transport Forum, either through the TRIMMA or STF processes as identified in LR’s response to 001953-8.56-Applicant-response-to-Deadline-2-submissions-comments-from-IPs-on-D1-Appendix-F-Friends-of-Wigmore-Park

002784-8.163 Applicant’s Response to Deadline 6 Submissions Appendix A - Friends of Wigmore Park

I.D	Topic	Luton Rising’s Response
1	General	<i>The Applicant will be providing a Residual Impact Fund (RIF) that will be managed by a Steering Group of the Airport Transport Forum. One of the uses of the RIF will be to fund measures to mitigate the impacts of fly-parking. Relevant local highway authorities will be able to propose measures to mitigate fly-parking. These measures will be delivered via the processes outlined in the OTRIMMA (REP5-041).</i>

SLAE Response

We support this response, although why are no residents that live in wards adjoining the airport invited to be represented on the Steering Group of the Airport Transport Forum?

002780-8.161 Applicant's Response to Written Questions - Traffic and Transport

PINS ID	Question / Response
TT.2.21	<p>Question: Parking</p> <p><i>What are your proposals for monitoring the provision of off-site parking (supplied by third parties, including privately rented driveways)? How would you ensure that if lower than anticipated provision of car parking occurs in the future it can be identified and mitigated before it causes any issues such as fly-parking?</i></p>
<p>Response:</p> <p><i>In recognition that the market for off-site parking is likely to increase due to the Proposed Development, the Applicant has forecast an increase in off-site parking trips due to the Proposed Development; however, the Proposed Development does not necessarily require an increase in</i></p>	

supply to cater for this forecast because alternative options (in particular via sustainable modes) will be available if there is insufficient supply. The Applicant is therefore not proposing to monitor the provision of off-site parking (either by third party organisations or in private driveways). The Applicant does not consider that it would be appropriate to monitor the activities of private organisations or individuals, nor does it have the means to do so.

*The Applicant considers that fly-parking occurs due to a reluctance to pay for parking, rather than being the result of a lack of provision; the Applicant does not see a direct correlation between supply of off-site parking and passengers choosing to fly-park. The Applicant will, however, work with local authorities to alleviate fly parking where this is identified as being a particular problem associated with airport users; authorities can address fly-parking via use of the Residual Impact Fund – as described in the **OTRIMMA [TRO20001/APP/8.97]**. The Applicant does not propose to seek to mitigate fly-parking before it occurs as this would suggest that residents should be subject to a parking permit parking scheme for a potential fly parking issue that might occur at an undetermined point in the future. In addition to do so would result in the unnecessary depletion of the Residual Impact Fund – some evidence of fly-parking as an ongoing issue will be required. If there is a shortfall in the supply of car parking, the Applicant anticipates that this would result in an increased propensity for passengers to use public transport.*

In the event that the overall supply of parking is considered to be insufficient, as a result of less off-site parking capacity coming forward than is assumed, the Applicant could consider the option of providing additional on-site parking and seeking planning approval to do so. However, for the reasons set out above the Applicant does not see this as a solution to passengers choosing to fly-park. A shift of modes from private car to sustainable travel is therefore preferable to increasing parking provision, and as such this would remain a key focus.

SLAE Response

There are a number of disappointing statements in the applicant's response.

Alternative options (in particular via sustainable modes) would already be working today, and because there is a problem that exists today, then it is a known and existing issue caused by the airport.

The applicant must monitor the effects of off-site parking which also includes parking on public roads as well as third party organisations and private driveways. Otherwise, the extent of the problem will not be known. Parking on private driveways by customers and workers of the airport could be a tax earner for the Government and figures should be recorded to assist the recovery of any avoidance of that tax.

If the Applicant considers that fly-parking occurs due to a reluctance to pay for parking, then why quote third-party organisations and private driveways, who will probably be charging for parking, albeit cheaper than the airport.

Although it is pleasing to read that the Applicant will work with local authorities to alleviate fly parking where this is identified as being a particular problem associated with airport users, there is clear confusion in the many documents whether it is the STF or RIF or both that will address this. An up to date, clear and concise document (amalgamating all the previous unclear documents) with timescales would be welcome. SLAE ask for this to be completed and available by deadline 11.

It is fair and just for the Applicant to address fly-parking as it currently happening at the moment, rather than wait. If the applicant is not going to monitor fly-parking then they will never acknowledge the problem and continue to upset those impacted by it. The recent announcement by Bloor Homes and the Crown Estate to submit plans to build 2,100 houses on land to the East of Luton, will increase fly-parking here and in particular when Terminal two is built. Whether these plans will succeed or not the land is earmarked for housing development.

Any parking permit parking scheme to address a potential fly parking issue, must be paid for by the airport and not the residents, and there appears to be mechanisms to do this under both the STF and RIF.

Depletion of the Residual Impact Fund suggests that it is not 'fit for purpose' and that the fund is not sized correctly.

002644-8.134 Applicant's Post Hearing Submission - Issue Specific Hearing 7 (ISH7)

6.1 'Fly-parking'

*6.1.1 The Applicant provided an update on the work done since the last hearing regarding this issue, including a summary of the engagement with the relevant highway authorities. There had been discussions with all relevant authorities. Discussions take place as part of the consultative committee quarterly, attended by the Applicant, the operator, LBC, CBC, BC, the Combined Authorities, community groups and others. In 2017 a possible Controlled Parking Zone (CPZ) in the Wigmore Lane area was rejected by residents (see **Appendix A of the Transport Assessment [APP-200]**), the Applicant noted that discussion on this was continuing.*

SLAE Response

Please make available the reasons why the Wigmore Lane area was rejected by residents?
Why does Appendix A of the Transport Assessment [APP-200], not provide this information or any reasons?

Please make public what discussions are continuing?

6.1.2 LBC confirmed that the Wigmore scheme was rejected as residents didn't want a residents parking scheme at that location, primarily for reasons due to the cost of permits. The ExA queried whether there had been discussion on covering the cost of permits. LBC confirmed their policy is that permit costs should be paid by those who benefit, though they may look to the Applicant to fund the consultation process. Limited waiting was also offered but not taken up as the Wigmore area was not suffering from fly parking to the extent that was experienced in Vauxhall Park and fly parking didn't appear since then to have migrated to Wigmore.

SLAE Response

Please provide evidence that fly parking isn't the same as the extent that is experienced in Vauxhall Park?

Please provide evidence that the same levels won't be experienced in Wigmore and the East of Luton housing development in the future?

Link to LBC minutes where the cost of a Controlled Parking Zone was refused and permits passed onto residents as a result of airport fly parking. 92 Notice of Motion (Ref 11.3)

<https://democracy.luton.gov.uk/cm5public/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=wqYhYq6Ms6ukNh6t1tGJyIHeUg6L5d%2bIHKWGx4zBEpyfj%2fUVc%2b5bsQ%3d%3d&rUzwRPf%2bZ3zd4E7lkn8Lyw%3d%3d=pwRE6AGJFLDNlh225F5QMaQWcTPHwdhUfCZ%2fLUQzgA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFfXsDGW9IXnlg%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fpWZQ40DXFvdEw%3d%3d=hFflUdN3100%3d&uJovDxwdjMPoYv%2bAJvYtyA%3d%3d=ctNJFf55vVA%3d&FgPIIEJYlotS%2bYGoBi5oIA%3d%3d=NhdURQburHA%3d&d9Qjj0ag1Pd993jsyOJqFvmyB7X0CSQK=ctNJFf55vVA%3d&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJFf55vVA%3d&WGewmoAfeNQ16B2MHuCPMRKZMwaG1PaO=ctNJFf55vVA%3d> (accessed 03/02/2024)

6.1.7 The Applicant explained that the RIF existed to address unidentified impacts, which included fly parking. Fly parking had also been identified in the FTP as an issue to be addressed to help to control vehicle use and incentivise use of sustainable modes so there is also a link to the STF. The OTRIMMA [REP5- 041] at Figure 4.1 identifies fly parking as an example of something which may be identified by monitoring and thus addressed by the RIF.

SLAE Response

Please confirm if this is addressed by the EIF or STF or both?

002569-Luton Borough Council - Post-hearing submission - Responses to ISH7 Action Points

LBC Action Points arising from ISH7 Traffic and Transport No. Description LBC Response

18	Detail potential options to mitigate the fly parking issue in the Luton area including exploration of whether a Controlled Parking Zone could be progressed/ would be viable including exploration of how these measures could be funded without any cost to residents.	The highway authority has a consultation on parking for the Wigmore ward on its works programme for 2024/25. Following discussion with the Applicant, the Applicant has agreed to fund the consultation. The consultation will include options on parking controls intended to prevent airport related fly parking. One of the options being the introduction of a Controlled Parking Zone (CPZ) with residents parking permits. It has also been agreed that any parking controls introduced as a result of the consultation will be funded by the applicant, including the TRO costs and any required lining and signing. The Council’s policy is that parking permits are funded by the permit holder. Consequently any permits introduced as part of a potential CPZ in Wigmore (or anywhere nearby) would be paid for by permit holders. It should be possible to provide more detail on the possible parking controls to be offered by the end of the examination. It should be noted that the Council continues to work with Luton Airport on the development of its Parking Management Strategy 2024-2034. The strategy has identified neighbourhoods in the vicinity of the airport as “key areas of investigation”. This strategy is expected to be adopted in 2024. It is anticipated that the Airport Transport Forum and use of the Residual Impact Fund may also be used to implement parking controls over the life of the expansion plans.
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SLAE Response

SLAE are disappointed with a number of the statements made by our Council, who is supposed to represent the residents that live adjacent to the airport.

We prefer there not to be a Fly parking issue at all. The fact that there is, is caused by the Airport and its customers.

Can the definition and meaning of a ‘TRO’ be explained?

The Council needs to appreciate that the airport has caused the fly parking issue and therefore needs to change its policy accordingly to address this exceptional issue. Permit’s need to be funded by the Airport.

SLAE look forward to being able to read and comment on the possible parking controls before the end of the examination.

The council are also advised to work with North Herts District Council to address any future fly parking that will occur as a result of plans to build housing on land East of Luton (EOL). LBC must provision funds to implement and maintain parking controls past the life of the expansion The LBC Parking Management Strategy 2024 – 2034 doesn't match with the life of the expansion plans, therefore may not be aligned.

002368-8.97 Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA)
4.1.2 The RIF will be a finite fund for the mitigation of residual airport-related traffic impacts. This fund will be secured in the section 106 agreement. Further details will be provided in the Steering Group Terms of Reference to be contained in the final TRIMMA

SLAE Response

SLAE reflect the concerns that the National Highways reflect in TR020001-002589-8.127 Applicant's Response to Deadline 5 Submissions Appendix E - National Highways, I.D 9. SLAE note that Luton Rising's response is lacking in detail and avoids many of the questions asked.

There needs to be a provision for a fund that exists to deal with residual airport-related traffic impacts for the life of the airport.

000820-7.02 Transport Assessment Appendices - Part 1 of 3 (Appendices A-E).

Drawing Number: LLADCO-3C-ARP-SFA-SWI-DR-CE-0003 – (Indicative area of potential residential parking controls).

SLAE Response

At least two further drawings are missing from the document, the Wigmore estate and the future housing development to the East of Luton, where fly parking will occur during and after airport expansion. Why is this?

We recommend that a drawing is provided for each of the three airport expansion phases.

SLAE suggest that Luton Rising or LLAOL contact parking apps that encourage private parking to understand size of issue.

SLAE suggest that Luton Rising or LLAOL price their car parking to discourage the private and fly parking.

SLAE suggest that Luton Rising contact companies such as Uber to remind them of free car parking options and to discourage fly parking.

The screenshot shows the 'parkonmydrive' website interface. At the top, there's a search bar with the text 'London Luton Airport (LTN), Airport' and a '1m' radius dropdown. A 'SEARCH' button is visible. Below the search bar, there are options for 'Type of space: Drive' (checked), 'Garage', and 'EV Charging?'. The search results section shows 'We are showing the nearest 7 available spaces between 2024-02-06 arriving at 08:00 and 2024-02-09 leaving at 19:30 (whole day(s)) out of 8 currently registered spaces parking spaces (of type(s): drive, garage) within an approximately 1-mile radius of London Luton Airport (LTN), Airport Way, Luton, UK'. A map shows the location of the airport and surrounding areas. A list of results is shown, with the first one being '1 Parking on Keeble Close, LU2' with a rating of 3.2/5. The description for this space is 'One space (the second slot from the corner), located at 4 Keeble Close, Luton, LU2 9RT. It is approximately 100m from business'.

JustPark Help Login Sign Up

Parking at Parking from Parking until

Recommended Cheapest Closest

Park Up Meet and Greet
 Just added
 7 mins to destination
 Reserve for **£57.00**

Maple Parking Meet and Greet
 Just added 1 booking
 7 mins to destination
 Reserve for **£59.99**

Purple Parking Meet and Greet

Trustpilot ★★★★★ 100,000+ reviews

JustPark Help Login

Parking at Parking from Parking until

Parking on The Dell, LU2 ×

Great space Reservable private driveway
 ★★★★★ (3) 32 bookings Best price guaranteed

4d 4h Total duration **£19.80** Parking fee 0.75 Miles To destination

Reserve for **£19.80**

Trustpilot ★★★★★ 100,000+ reviews

Previous SLAE submissions that mention fly parking:

002041-SLAE - Wigmore Valley Park Written Rep

002974-SLAE - Parking Issues

001629-01 - SLAE - Comments on WRs - Climate Change - A Summary

002574- submissions received by Deadline 5

Photos taken at a quiet time of day for fly parking drivers at Wigmore Valley Park, dated 04/02/2024.



a.



b.



c.



d.



e.

- a. One car fly prking at the entrance to WVP
- b. Grass verge cut up at entrance to WVP by fly parking
- c. Opposite grass verge cut up at entrance to WVP by fly parking
- d. Camera able to view fly parking at WVP entrance
- e. Litter still sitting onto of bushes at WVP, assumed to be left by fly parkers.

Thank you for your "Nuisance parked vehicle" report



From "Luton Council" <luton-noreply@lovecleanstreets.com>
to chrishaden@btpenworld.com

Thu 25/01/2024 22:11

Allow email tracking. SendGrid email tracking was blocked to preserve privacy.



Hi,

We've received your "Nuisance parked vehicle" report, which is currently being reviewed by an administrator.

Summary of report

Your reference is **D97971** - quote this number if you need to contact us about your report

Category of report: Nuisance parked vehicle

Report content: Each evening, many vehicles are parked on the grass and pavements, including on double yellow lines at the entrance to Wigmore valley park. They appear to be waiting for their mobile devices to alert them to people who require picking up from the airport. The drivers of these vehicles chuck their litter into the hedges and the area by the entrance. It is impossible to litter pick this area

Report location (address): Wigmore Hall Access Road, Luton

