

Interested Party Reference 20037819

Luton Airport Expansion

Summary of Written Representation by the Chartered Institute of Logistics and Transport (CILT)

- 1 We support the expansion of Luton Airport because we consider that it is possible to achieve the social and economic benefits of a growth in air travel in a sustainable manner. Our support is entirely dependent upon strict conditions relating to carbon emissions, noise and surface access, as outlined in this representation.

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Introduction

- 2 The Chartered Institute of Logistics and Transport (CILT) is a professional institution embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration. Our principal concern is that transport policies and procedures should be effective and efficient, based on objective analysis of the issues and practical experience, and that good practice should be widely disseminated and adopted. The Institute has a number of specialist forums, a nationwide structure of locally based groups and a Public Policies Committee which considers the broad canvass of transport policy. This submission draws on contributions principally by the Aviation Policy Group, who have experience in airport and airline planning and operations and take a UK-wide view of airport expansion, noting in particular the implications for other modes and environmental effects.
- 3 In this written representation we comment on Demand and Capacity, Surface Access, Phasing, Noise, and Greenhouse Gas Emissions.

Demand and Capacity

- 4 It is clear that there is demand for additional air travel in the UK above the 2019 level. How much of this demand should be met is a matter for national policy and it has long been policy that not all demand should be met, primarily to ensure that the impacts are not greater than the benefits. At the regional level, it is also clear that demand for air travel in South East and Eastern England will exceed available capacity in the next few years and this also applies to the local market around Luton, given that 2019 levels were already in excess of capacity. However, it is possible to consider the balance between benefits and impacts at each airport, as is done in the Need Case.
- 5 In relation to the Need Case, while the economic benefits can be quantified in terms of both jobs and GVA, air travel also brings social and cultural benefits which are not quantifiable. Examples of such benefits particularly relevant at Luton are the family connections between the UK and many parts of Eastern Europe and Israel.
- 6 Luton's location means that it can serve London and parts of the Midlands, South East and Eastern England. There are other airports in this area which provide competition, in particular Stansted and Birmingham. On the one hand, such competition is good for passengers, but on the other, it may result in more capacity than can be justified by demand from this region. Stansted has approval to grow from its 2019 level of 28.1 m passengers to 43 mppa.

Birmingham served 12.7 m passengers in 2019 and the DfT assessment of its capacity is 37 mppa by 2030.

- 7 It is possible that the actual growth may turn out to be less than as indicated in the Need Case, for example if the strict conditions we propose for carbon emissions, noise and surface access restrict such growth or add to the cost of air travel. However, in such circumstances, the financial impact will be borne by the entities who own the airport. In other words, those entities will have to have confidence that the demand will be there and that the conditions can be met before they decide to invest.
- 8 We note that the forecasts of cargo relate to the existing all-cargo aircraft operations plus the availability of belly hold capacity on long haul flights in the future. Given the competition for air freight at Heathrow, East Midlands, Stansted and potentially Manston plus the limited land availability at Luton we agree that these modest forecasts seem reasonable.
- 9 Luton Airport is currently (or at least in 2019) the largest Business Aviation airport in the UK in terms of aircraft movements. We note that the approximate 2019 level of around 30,000 movements is considered a realistic upper bound. We agree with this assessment but note that other Business Aviation airports (in particular Farnborough and Biggin Hill) have significant spare capacity and may well offer opportunities for growth which, coupled with an inability to grow at Luton, would result in the decline in Business Aviation activity.

Surface Access

- 10 Overall, the proposals for surface access are appropriate for the expansion. Given the expected congestion conditions on the M1 in any event, the rail mode share will have to increase significantly. The DART transit is a significant improvement and will provide a high quality link to the second terminal. As operational experience is gained, it will need to demonstrate a smooth interchange with rail services. Rail services from Luton Parkway now include express East Midlands longer distance and high frequency Thameslink services. The East Midlands Trains service provides a headline 20-minute non-stop journey twice an hour to and from St Pancras and connections with places to the north. Thameslink provides a high frequency (6 trains per hour) service with various calling patterns which continues through London. Air passengers therefore have a choice of train and need to be carefully directed to the most appropriate service, bearing in mind such issues as how full the train is and whether the train is direct or requires a change. Monitoring will be required to try to ensure that sufficient capacity is available for airport passengers alongside other rail users in future years.
- 11 While the proposals for public transport are appropriate for expansion, the current Airport Surface Access Strategy is inadequate in its marketing and promotion activity. There are good rail, coach and bus links with many locations but these are not sufficiently publicised. The Airport's Surface Access team will need to be considerably strengthened if the public transport mode share targets are to be met.

Phasing

- 12 The reasons for the phasing are unclear. It may be that Phase 1 is designed to limit the early impact from construction, but the downside is that it requires extensive works in areas for passengers and aircraft operations. There may be advantage in a phasing which constructs new facilities and infrastructure for the second terminal, returning to expand the existing terminal after opening the second terminal.

Noise

- 13 In addition to the various proposals to manage and mitigate the environmental effects, we suggest that a night ban should be considered. Such a ban was proposed for the third runway at Heathrow and has been implemented at some European airports. A night ban would be seen as a major improvement which will help to build bridges with the local community.

Green Controlled Growth

- 14 We are very supportive of the principle of Green Controlled Growth and agree that it should encompass Greenhouse Gas (GHG) emissions, aircraft noise and surface access. We would note that the proposed Green Controlled Growth system is not the only means of controlling impacts and there are other regulations and conditions which will be in place, for example for air quality which is covered by separate legally enforceable regulations relating to limit values of pollutants. We support the proposed limits for aircraft noise (day and night noise contour areas) and surface access (air passenger and staff mode shares).
- 15 For GHG emissions, we note that expansion proposals at other UK airports have been permitted even though the expansion would lead to an increase in GHG emissions, on the basis of the policy that the total GHG emissions from aviation are controlled at national level, primarily through the Carbon Budgets. Such expansion permissions have also been tested in the courts. We do not dissent from this view, but suggest that for the proposals for Luton, which are for an NSIP, the result is a potential increase in GHG emissions of a sufficient amount that a specific control on growth related to GHG emissions is appropriate. We are confident that the aviation industry and, specifically the manufacturers, the airport operator, the airlines that operate at the airport and all the other associated organisations can achieve reductions in GHG emissions but we recognise that other parties need to be assured that this is the case. Our proposed addition of GHG emissions from all flights departing from the airport will provide this assurance.
- 16 We therefore propose that the Green Controlled Growth mechanism should include Scope 1, 2 and 3 emissions and, in particular, emissions from aircraft departures in flight. The detail of how the reduction in GHG emissions should be included in the mechanism should be a matter of negotiation and agreement between the airport and the planning authority and decided through the DCO process. However, in principle, the GHG emissions should be calculated for a baseline period (eg. 2019, or possibly for a multi-year period up to 2019) and then forecast for the periods covered by the Carbon Budgets (for example, specifically for CB6 2033-2037). Initial figures are contained in the Environmental Statement Volume 5 Chapter 12. These two figures should then be expressed as a percentage of the total UK GHG emissions. The control would then be that, if GHG emissions in 2033-2037 remain below the baseline percentage related to Carbon Budget 6, growth can continue. If emissions are above the baseline percentage, further growth would not be permitted. The detailed mechanism for GHG emissions would be similar to that for other elements of the Green Controlled Growth mechanism.

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