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Luton Rising response to my statements from Open Floor Hearings.
Document 8.33

The responses to my written statement are in section 15, pages 41-43.

In response to my observation that commercial income will be of greater consideration than Green Controlled Growth observance, received the following response:-

“Green Controlled Growth (GCG) has been developed to place Luton Rising’s commitment to environmental sustainability at the very centre of the expansion proposals and is considered to be one of the most far-reaching commitments to managing environmental effects ever voluntarily put forward by a UK airport. As set out above, the GCG Framework is legally binding, and so compliance with GCG must be prioritised to enable the sustainable expansion of Luton Airport.”

In response to the highlighted comment, could the applicant please qualify that statement by provided evidence as to which organisations considered the GCG strategy, and how they arrived at that conclusion? By organisations I do not mean the consultants engaged by the applicant, but by external organisations/industry bodies.

Which other UK airports have looked at developing a GCG approach to their airport operations?

Questions from the Issue Specific Hearings.

The applicant described itself as social enterprise for the betterment of opportunity and quality of life in Luton.

Could the applicant please list the permanent employment it has created/has been directly involved in creating, over the past ten years in Luton and the surrounding area, which has not been airport specific?

Why has the applicant not pursued job delivery in other areas, such as green infrastructure industry, and at sites across the Borough rather than on its eastern boundary?

These industries would be more secure and better paid than employment opportunity at Luton Airport. They would also remove the expensive travel costs getting to the airport site.

For the benefit of the ExA, my questioning is to provide insight for them that the applicant is solely interested in creating job opportunity at the airport, and not in alternative employment covering more opportunity, and at sites across the whole of Luton.

Airport jobs as you are aware, are majority low pay/seasonal/zero hours, hence the high turnover/low take up of vacancies at the present times. Surely a true social enterprise should cover the creation of good employment opportunity across the whole Borough?

Green Controlled Growth (GCG) control through slot allocation.

The applicant has as a central plank of its application, the control of air and noise pollution by the removal of slots when breeches have occurred/will occur.

I cannot find any provision for an airport to remove a slot from an operating airline within the binding guidelines within UK aviation policy, despite the applicant stating that they can.

The House of Commons Library, 29/06/20, published a short explainer on airport slot. (1)

That article details that the only body able to remove slots from an operator at a UK airport, as the Competition and Markets Authority.

Both the International Air Transport Association (IATA), International Civil Aviation Organisation (ICAO) and the UK company that details with slot allocation, Airport Coordination Ltd (ACL), show that a slot can only be taken back by an airport operator under the “use it or lose it” model. If a slot is not used for 80% of a season, it has to be returned to an airports slot pool.

In this case, can the applicant detail exactly how it will legally take slots back from operators?

Has the operator begun dialog with the airport operator/operating airlines to see how the removal of slots will be achieved?

How will the applicant ensure acceptance of their plans at UK/European authority level?

If this dialogue will not commence until after the DCO has been granted, will the applicant guarantee that no extra slots will be released until a binding agreement to return them if GCG is not met has been reached?

What will be the procedure if said airlines refuse to return slots?

Will the loss of slots require a financial penalty to be paid by the applicant, or airport operator, as a result of loss of income?

For the benefit of the ExA, my questioning is to show that once again the applicant has made a statement within its application, which it does not have the power to deliver.

It has not attempted to show social responsibility for those experiencing discomfort from current airport operations, yet seeks to show that it will do in the future, when historically it has proven that it cannot be trusted to take action on such matters.

(1) <https://commonslibrary.parliament.uk/airport-slots-a-short-explainer/>

When asked about the provision of a complete closure of operations at night, the applicant stated that this was not possible as it would make Luton Airport commercially unviable to the low cost airlines that provide virtually all the movements at Luton Airport.

Those airlines could take those movements to other airports, which would then mean less choice for local passengers, and increased travel to other airports.

To validate that position, can the applicant provide details for last year, 2022, of the passenger loads for all flights that were scheduled for slots between 2300-0600, for each day of the week, split into summer/winter season?

Can the applicant show as a percentage those passenger loads as part of the daily total?

Can the applicant provide details as to whether those flights operated at a commercial loss to the operator, or made a profit?

Can the applicant provide details as to the ticket price for those flights operating within that night period?

Can the applicant provide details as to if a slot is allocated to one of the Fixed Based Operators for executive jet movements, does the user of that slot have to pay a premium?

I appreciate such commercial data should not be publically available. However, I believe that the ExA should be party to that data, as it would allow them to see first-hand if the commercial benefits of expansion are realistic based on current actual data.

For the benefit of the ExA, the reasoning for my questions is as follows:-

If the flights that operate on night slots are not commercially viable for an operator, unless the ticket price is reduced, or those flights are run at a loss, then there is a case that a night jet ban will not have a commercial impact on an operator, but in fact the opposite as they will save money? It will also remove unnecessary air and noise pollution and give respite to those affected during key sleeping hours. I would also suggest that such a gesture under GCG regulations would bring about less public anger at increased noise during daylight hours operations?

As the flights which currently operate during the night period, are generally served several times a day already, losing those flights would not affect income as those passengers would transfer to earlier flights?

From limited research as to what is available on airline booking sites, it would appear that fares on those flights returning overnight are cheaper than daytime flights. This to me shows that these flights are not demand lead by the consumer, but rather price lead and to use allocated slots?

For the past four summer seasons, executive jet movements have been subject to a night slot restriction, due to the need to bring noise levels down to meet the noise contours broken in 2019. Executive jet movements at night are not essential, so any night closure affects could be argued is an acceptable inconvenience?

I am trying to highlight that a voluntary night ban, as at Heathrow, is achievable at Luton, if the applicant is serious about becoming a good neighbour to local communities?

The applicant stated that loss of night flights would mean less choice for local resident airport users.

Can the applicant provide, once again for 2022 please, a breakdown of all airport users from the local three counties, Bedfordshire/Hertfordshire/Buckinghamshire, as a percentage of the total passenger throughput?

For the benefit of the ExA, I ask this question because I believe it will show that the statement made by the applicant of lost travel opportunity for the local region is incorrect.

That as the dominate market share for current airport routes, Eastern Europe, in fact will show that those passengers travel the largest distances to use those services, because of lack of choice at other gateways?

The applicant stated that a night closure could lead to current operators moving routes to other airports.

Could the applicant detail which London airports those flights could be moved to, as apart from Southend airport, all the others Heathrow/Gatwick/Stansted, are also slot constrained during the night period?

For the benefit of the ExA, I ask this question as once again, I believe it shows that the applicant is deliberately trying to exaggerate to the ExA the effects of a night closure would be at Luton Airport?