

# The Harpenden Society (“The Society”)

## Response to the Examining Authority (“the ExA”) Written Questions

### Question NE. 1.6 (specifically asked of the Society)

- 1 The Society’s view is that the applicant’s references to increasing air cargo are aspirational rather than grounded in reality.
- 2 Firstly, there appears to be little or no provision for additional cargo in the planned works nor is there anything in the fleet mix figures for “Do Something” in the Noise and Vibration Chapter 16 (pages 136-138) to suggest there will be any increase in air freight traffic from 2027 through 2042 (the data is not clear for 2019) nor any increase in the apron space allocated to air freight.
- 3 Secondly, Luton’s share of air freight is very small in the national context and it is likely that, in 20 years time, other air freight provision at dedicated facilities such as at East Midlands and Heathrow airports will have developed to meet any growing needs – whilst Luton has stood still. It is also worth noting that Luton airport’s air freight comprises less than 1% of total UK freight. The table below illustrates how small Luton airport’s share of air freight is:

Year	Total UK air freight (tonnes)	Luton airport air freight (tonnes)	Luton airport’s share of UK air freight (%)
2021	2,322,000	26,422	1.1
2020	2,002,000	32,607	1.6
2019	2,535,000	36,533	1.4
2018	2,631,000	28,811	1.1
2017	2,640,000	21,852	0.9

Sources: UK air freight tonnage from DfT table AVI0101 Air traffic at UK airports. Luton airport data from Luton airport passenger statistics.

- 4 Thirdly, the applicant makes the point that the future destinations it is proposing to serve in the “busy day” scenario are illustrative only so it is clear there is no strategy for developing air freight on long haul routes.

### Question NE. 1.5 (comment by the Society)

- 5 In respect of question 2, we would draw the ExA’s attention to the “Government ambition and joint declaration between Government and local partners”<sup>1</sup> in relation to the Oxford-Cambridge Arc which refers twice to Heathrow Airport – in the context of the link to the airport being “vital”- but doesn’t mention either Luton or Stansted airports and sets out policy objectives that refer to Productivity, Housing, Connectivity (principally via rail links,

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<sup>1</sup> [The Oxford-Cambridge Arc: Government ambition and joint declaration between government and local partners \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

nothing about air connectivity) and the Environment. Furthermore, an economic prospectus for the Arc<sup>2</sup> produced in October 2020 does not refer to air connectivity but does refer to rail and road connectivity under the heading “enabling infrastructure”. We doubt air connectivity is a challenge for an area that is within an hour or two’s drive of Heathrow for European and global connectivity and, on the Eastern side of the arc, within an hour of Stansted for European connectivity.

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<sup>2</sup> [Oxford Cambridge Arc - House of Commons Library \(parliament.uk\)](https://www.parliament.uk/libraries/oxford-cambridge-arc/)