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# London Luton Airport Expansion

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Infrastructure Planning (Examination Procedure) Rules 2010

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London Luton Airport Expansion Development Consent Order



#### The Planning Act 2008

#### The Infrastructure Planning (Examination Procedure) Rules 2010

## London Luton Airport Expansion Development Consent Order 202x

### 8.155 APPLICANT'S RESPONSE TO WRITTEN QUESTIONS - NEED

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## 1 RESPONSE TO EXAMINING AUTHORITY WRITTEN QUESTIONS (NEED)

Table 1.1: Responses to the Examining Authority's Written Questions (Need)

PINS ID	Question / Response
NE.2.1	Question:
	Revised Gross Domestic Product (GDP) forecast The Office for Budgetary Responsibility (OBR) published its economic forecasts in November 2023 including revised GDP figures. Give forecasts in the Need Case uses economic forecasts dating back to March 2022, to allow the ExA to provide a recommendation to the more up-to-date economic data, please provide revised forecasts for the central, slower and faster planning case based on the November commentary of the extent to which the revised economic forecast affects the previous demand forecasts. If this is not considered to be Response:
	The process of producing demand forecasts for the Proposed Development is a complex multi-stage process involving assessing th demand across the southern part of the UK and then assessing London Luton Airport's share of that market in competition with other air GDP projections on its own does not flow straight through to a change in the planning cases for London Luton Airport as there are o share.
	Hence, as agreed with the ExA, it is not possible to produce updated planning case outputs for Deadline 7 but the Applicant has undertained
	Nonetheless, in relation to changes consequent upon the latest OBR short term economic forecasts, it is important to recognise that the at approximately 6 monthly intervals and, as explained at paragraph 2.2.3 of <b>REP2-042</b> , can vary upwards as well as downwards.
	It is not normal practice to adjust long term planning forecasts for an airport every time there is an adjustment to short term economic that long term passenger demand forecasts produced during a period of short term economic slowdown can underpredict future demand of strong economic growth can lead to overstatement of long term demand. This is illustrated by the pattern of Department for Transport demand as shown in Figure 1 below, recognising that the base year for each forecast is typically two years ahead of the publication dates the base of the pattern of the publication dates and the product of the publication dates are shown in Figure 1 below.

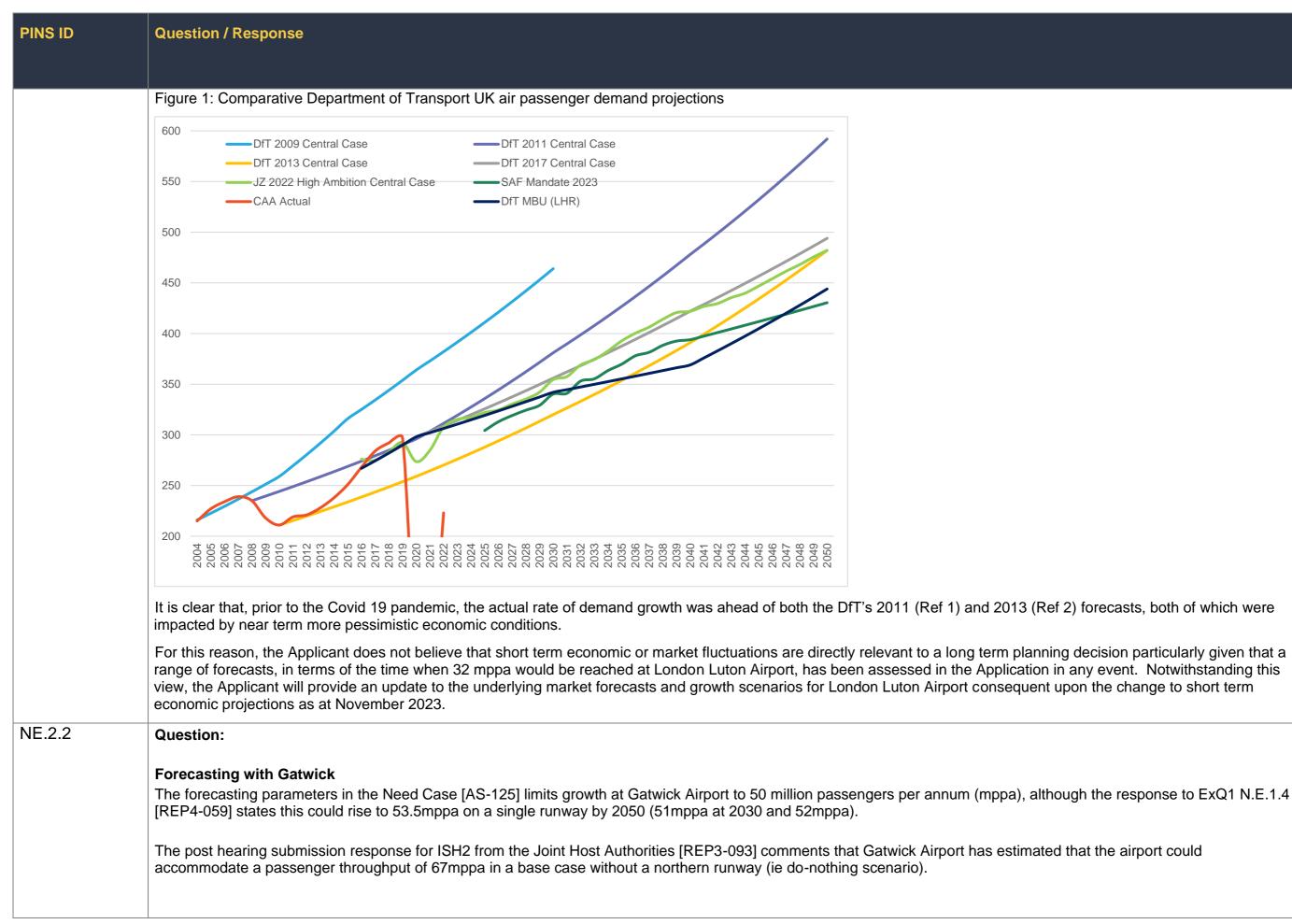
en that the model used for future Secretary of State (SoS) based on ber 2023 OBR data and a written appropriate, please explain why not.

he expect rate of growth in passenger hirports. A change to the short-term UK other factors that can influence market

taken to produce these for Deadline 8.

nese economic projections are updated

c projections. Evidence would suggest d, whilst those produced during periods ort (DfT) forecasts for UK air passenger ate:



PINS ID	Question / Response
	<ul> <li>Applicant:</li> <li>1. Explain why there is a difference between your assumptions and that by Gatwick Airport as quoted by the Joint Host Authorities.</li> <li>2. Explain whether a difference of 14mppa between the figures can be considered 'marginally greater' (using the terminology in your [REP4-059]) and the implications a difference in increase of 14mppa would have on your forecasting figures.</li> </ul>
	Local Authorities: 3. Provide any comments on this question.
	Response:
	As noted in response to question NE.2.1 above, assessing the effect of a change in any individual assumption within the demand forecand the Applicant has agreed with the ExA to provide a detailed response following remodelling at Deadline 8.
	This would include responding to the question as to what effect a 14 mppa increase in capacity assumed at Gatwick (or capacity for 67 in granted to its Northern Runway Project, would have on the demand projections for London Luton Airport. This would be material to the additional runway in the London system or one with an additional runway at Heathrow only, which would also necessitate updating the over which a new runway could be delivered at Heathrow bearing in mind that the planning process has not yet recommenced.
	As explained in response to ExAQ1 NE.1.4 [REP4-059], a change in the underlying scenario forecast does not flow directly through to th Luton Airport as these are deliberately hybrids of different scenarios as explained in Section 6 of the Need Case [AS-125], reflecting un economic growth over the longer term, costs of carbon and/or its abatement and whether one or both additional runways will be consent
	In terms of the assumptions about the capacity attainable at Gatwick based on its existing single runway, the capacity figure of 50 mppa a taken from the longer term capacity with a single runway assumed by the DfT in its <i>UK Aviation Forecasts 2017</i> (Ref 3) at Table 22, wh 2030 and 50 mppa thereafter. As noted in response to ExAQ1 NE.1.4, the Applicant accepts that aircraft size and load factor growth could slightly above 50 mppa over the longer term but considers that the adoption of the same capacity assumption for Gatwick with a single runway assumed by the DfT in the same capacity assumption for Gatwick with a single runway assumed by the DfT in the same capacity assumption for Gatwick with a single runway assumed by the DfT in the same capacity assumption for Gatwick with a single runway assumed by the DfT in the same capacity assumption for Gatwick with a single runway assumed by the DfT in the same capacity assumption for Gatwick with a single runway assumed by the DfT in the same capacity assumption for Gatwick with a single runway assumed by the DfT in the same capacity assumption for Gatwick with a single runway assumed by the DfT in the same capacity assumption for Gatwick with a single runway assumed by the DfT in the same capacity assumption for Gatwick with a single runway assumed by the DfT in the determined by the DfT in the
	The Applicant recognises that Gatwick Airport Ltd has claimed that it can accommodate up to 67 mppa with only a single runway in use to mppa in 2038) – see Environmental Statement Forecast Data Book (Ref 4).
	This assessment of capacity has not been validated and the Applicant is aware that there is already substantial concern being expressed levels of delay at Gatwick (Ref 5 and Ref 6).
	The concerns relate both to the current single runway operation and future operations with two runways. The Applicant believes that the current infrastructure is one reason why demand recovery at Gatwick is lagging that at other major UK airports, including London Luton a 15% increase in passenger aircraft movements at Gatwick above 2019 levels which, in the light of expressed airline concerns, the Applicant believes at this would simply exacerbate delays that the airlines already say are unacceptable.
	The Applicant considers that its existing assumption of 50 mppa is realistic and robust for the purpose of considering the likely complexing apacity being available at London Luton Airport and Gatwick airport constrained to a single runway.
	Without prejudice to this view, the Applicant will further assess the potential implications if such an uplift in capacity were to be attainable
NE.2.3	Question:
	Load factors Your response to ExQ1 N.E.1.4 [REP4-059] states low cost carriers, such as those that provide the majority of flights at Luton Airport, te factors than the full service airlines, such as British Airways, that play a more substantive role at Heathrow and Gatwick, due to offering of flexibility of tickets.
	Given that Gatwick also operates as a hub for Easyjet, where the factors quoted in your response would not apply, provide further evider

ur response to ExQ1 NE.1.4 in

ecasting process is not straightforward

Y mppa), assuming that approval is not the scenarios where there is either no assumption as to the likely timescale

he planning forecast cases for London incertainty as to the underlying rate of ited and brought into use.

as used in the demand modelling was hich shows capacity of 45 mppa up to Ild enable the capacity to be increased runway as used by DfT is robust.

by 2047 (59.4 mppa in 2032 and 63.4

ed by the airlines regarding current

the delays being experienced with the Airport. Achieving 67 mppa requires oplicant does not believe to be realistic

petitive interaction between additional

le by Deadline 8.

end to operate with higher load different classes of travel and

ence to justify this statement.

PINS ID	Question / Response
	Response:
	When considering airports, it is necessary to consider the blended average effect of all the airlines and, therefore, some airlines at Gatwick v (such as easyJet and the charter airlines) whilst others may operate with lower load factors such as some full-service airlines. In the cas during 2023 were operated by full-service rather than low cost airlines and this impacts on the load factor attainable. At London Luton Air provided by the three low cost airlines, easyJet, Wizz Air and Ryanair. Gatwick also aspires to attract growth from more long haul mainlines see the average load factor further eroded.
	The International Airlines Group (IAG) which owns British Airways publishes statistical data (Ref 7) and this shows that in 2019 (prior to th recovery periods) the average load factor for British Airways was 83.6%, marginally up from 82.5% in 2018. By comparison easyJet had Ryanair had a booked load factor (some of these passengers may not have flown) of 95% (Ref 9).
NE.2.4	Question:
	Load factors and average seats per flight Your response to ExQ1 N.E.1.4 [REP4-059] states it is highly unlikely that load factors could feasibly continue to grow at the pace seen or estimated that this would continue at an initial rate of 1% per annum to the mid-2020s, declining to 0.25% per annum.
	<ol> <li>Explain how the 1% and 0.25% figures have been calculated.</li> <li>To allow for greater understanding of how the average seats per flight would change as a result of new generation aircraft being in comparison between current average seats per flight at Luton Airport and estimated average seats per flight on each of the aircraft Table 6.12] at each assessment year. Alternatively, explain why this information is not considered necessary.</li> <li>To what extent has the continued increase in average seats per flight as a result of transition to new generation aircraft, and the experienced at other airports, been included in your forecasting model?</li> </ol>
	Response:
	The graph provided in response to ExQ1 N.E.1.4 [REP4-059] covered load factor growth across the whole aviation sector for the period 1 related to London Luton Airport. This was to illustrate that, across the whole of the industry including at other airports around London, the increases in load factors.
	In terms of the specific assumptions about the number of passengers per passenger aircraft movement for London Luton Airport of 1% per annum, these figures reflect the average number of passengers per movement, which is a function of both load factors and aircraft size/se there has been growth in both factors not only at the airport but at other airports in the UK, Europe and globally. Hence, consideration ne aircraft seat capacity and in load factor (the proportion of seats occupied).
	1. The 1% and 0.25% figures (growth in passengers per movement) are not specific calculations but reasoned assumptions drawing extrapolating those trends, having regard to the airlines and aircraft types expected to operate at the airport. Given the anticipated not be plausible to expect the historic trend of high growth of over 3.5% per annum in passengers per passenger aircraft movement passengers per movement by 2043, suggesting an almost entirely wide bodied fleet of aircraft, which is not realistic. Hence, the as passengers per passenger aircraft movement reflects the expectation that the airport will remain dominantly a short haul airport an factors over the fleet as a whole probably peaked pre-Covid. The assumed increase in passengers per aircraft movement, therefor ongoing transition to new generation aircraft with slightly more seats per aircraft than the types they replace and reinstatement to p the current fleet replacement is complete, it is not anticipated that there would be substantial scope for further increases in seating relevant to the majority of operations at London Luton Airport.

k will have higher load factors typically case of Gatwick, around 29% of flights Airport, virtually all flights are currently inline carriers so, if correct, this would

the distortions of COVID and COVIDad a load factor of 91.5% (Ref 8) and

over the period 1999-2019. It is

introduced, provide details of a aft listed in the Need Case [AS-125,

extent of how this could be

d 1999-2019 rather than specifically there is little scope for further

per annum reducing to 0.25% per /seat capacity. Over recent years, needs to be given to both trends in

g on recent experience and ed aircraft mix at the airport, it would ent to continue as it would imply 383 assumed growth in average and that practically attainable load efore, reflects the anticipated and o pre-pandemic load factors. Once ng on the narrow body aircraft fleets

PINS ID	Question / Response	
	2. In 2019, the average seats per passenger flight was 188 and this had grown to 193 over the first 7 months of 2023. The fleet propriate planning Case in the Need Case [AS-125, Table 6.12] have an average of 197 seats per movement in 2027, climbing to 203 by 2 projected seat capacity for each type is consistent across all scenarios and are as follows:	
	Seat Capacity Notes	
	Airbus A319 156	
	Airbus A320 186	
	Airbus A320Neo 186	
	Airbus A321 210	
	Airbus A321LR 161 Long-range aircraft, hence fewer seats	
	Airlines operate in a range of configurations, mainly 235-239 seats (easyJet and Wizz Air	
	Airbus A321Neo 210-239 respectively)	
	Airbus A350-900 330	
	Boeing 737-800W 189	
	Boeing 737-900W 175	
	Boeing 737-Max10 220	
	Boeing 737-Max8         189-200         Airlines operate in a range of configurations	
	Boeing 737-Max9 175	
	Boeing 787-10 330	
	Boeing 787-8 254-291	
	Boeing 787-9 299	
	Dash 8-Q400 76	
	Embraer E190-E2 110	
	<ul> <li>It is important to note in relation to points 1 and 2 above that, the projections of annual aircraft movements (derived from the aver calculations) and fleet mix, have been endorsed as appropriate and reasonable by the Host Authorities, including within the Luto Common Ground (REP6-027, Point LBC14) and Hertfordshire County Council within the Statement of Common Ground (REP6-027, Point LBC14) and Hertfordshire County Council within the Statement of Common Ground (REP6-027, Point LBC14) and Hertfordshire County Council within the Statement of Common Ground (REP6-027, Point LBC14) and Hertfordshire County Council within the Statement of Common Ground (REP6-027).</li> <li>The forecasts for other airports within the forecasting model are not dependent on passenger per movement calculations specific passengers to their likely preferred airport limited only by any passenger cap applied but without reference to any specific load factors.</li> </ul>	
NE.2.5	Question:	
	<ul> <li>Forecasts A number of parties eg [REP2-064], [REP2-075] refer to the reduction from 70% to 52% in forecast passenger demand growth in the Hit the Jet Zero strategy: one year on (2023)(JZS OyO). In response eg [REP-061] and [REP-065], you acknowledge that the Government in 2050 are slightly lower than their previous projections, state that demand growth is expected to be faster in the near term and slower that the estimated passenger market size of 391 million air passengers in 2043 is understated. You also state that economic projections upwards and are slightly more optimistic over the medium to long term than those adopted by the Department for Transport (DfT). Given 1. Explain why your forecasts using less optimistic economic assumptions, as noted in your response to Chris Smith Aviation Consumincrease in passenger demand whereas those used by the DfT in JZS OyO have resulted in a reduced estimated forecast. 2. Explain the differences between the data used in your forecasts and those used in the DfT forecasts for JZS OyO. 3. Explain why demand in passenger forecast would be faster in the short term when revised GDP figures by the OBR in November growth in the short term.</li></ul>	

ojections presented for the Core 2039 and 205 by 2043. The

erage passenger per movement on Borough Council Statement of **031**, Point HCC15) along with the

cally and the model allocates actor assumption.

ligh Ambition Scenario on page 11 of t projections of air passenger demand r over the longer term, which means is for the UK have been revised en this:

sultancy Ltd [REP2-042], maintain an

r 2023 forecasts slower economic

PINS ID	Question / Response			
	Response:			
	of March 2022 as used in the d 042. The point being made wa for Transport's Jet Zero – One updated to the March 2023 ed	the Need Case forecasts using slightly more pessimistic forecast emand forecasts for the Proposed Development compared to the s that the then most recent economic projections were more optir year (Ref 10) on forecast update and closer to those used for th phomic forecasts, it was possible that the unconstrained foreca DfT might be understated over the short term to medium term.	e most up to date OBR projections of March 2023 at the time nistic than the November 2022 projections that were used b e DCO Application forecasts. At paragraph 2.2.4, the Appl	
	In response to the specific que	stions:		
	in its SAF Mandate for considering the most	lemand forecasts for the Proposed Development use slightly more precasts, referenced in Jet Zero – one year on. As the Applicate ecent OBR November 2023 economic projections and submit this but the Applicant's understanding of the differences in the data set	int has noted in response to ExA2.NE2.1, it will produce a s by Deadline 8.	
	Year	Need Case Sources	JZSOYO Sources	
		Short Term: OBR March 2022 Economic and fiscal outlook	Short Term: OBR November 2022 Economic and fiscal outlook	
	UK GDP	Long Term: OBR Fiscal Sustainability Report July 2020	Long Term: Department for Transport TAG Data Book November 2021 v1.17	
		Short Term: IMF International Monetary Fund, World Economic Outlook Database, October 2021	Short Term: IMF International Monetary Fund, World Economic Outlook Database, October 2022	
	Foreign GDF	Long Term: OECD Dataset: Economic Outlook No 109 - October 2021 - Long-term baseline projections	Long Term: OECD Dataset: Economic Outlook No 109 - October 2021 - Long-term baseline projections	
	ETS	DfT Jet Zero: further technical Consultation, Annex B: Illustrative Carbon Price Assumptions	DfT Jet Zero: further technical Consultation, Annex B: Illustrative Carbon Price Assumptions	
	CORSIA	DfT Jet Zero: further technical Consultation, Annex B: Illustrative Carbon Price Assumptions	DfT Jet Zero: further technical Consultation, Annex B: Illustrative Carbon Price Assumptions	
	Oil Prices	DfT: BEIS Fossil fuel price assumptions: BEIS FFPA19	Bloomberg data	
		ands that there were also some other differences in terms of seg vth projections due to changes in the economic parameters used	· · · · ·	
	<ol> <li>The comment regarding potentially slightly faster growth related to the implications if the March 2023 economic projections we impact of the November 2023 economic forecasts through remodelling and report at Deadline 8.</li> </ol>		· · ·	

e OBR projections e writing of **REP2-**by the Department licant noted that if he unconstrained

dopted by the DfT a revised forecast

/ear on forecasts.

have resulted in

ant will assess the

#### REFERENCES

Ref 1 Department for Transport, UK Aviation Forecast, August 2011

Ref 2 Department for Transport, UK Aviation Forecasts, January 2013

Ref 3 Department for Transport, UK Aviation Forecasts, October 2017

Ref 4 Gatwick Airport Ltd, Gatwick Airport Northern Runway Project, Environmental Statement, Appendix 4.3.1: Forecast Data Book <u>https://infrastructure.planninginspectorate.gov.uk/wp-</u> <u>content/ipc/uploads/projects/TR020005/TR020005-000905-</u>

5.3%20ES%20Appendix%204.3.1%20Forecast%20Data%20Book%20.pdf

Ref 5 Gatwick Airport Northern Runway Project Representation by Gatwick Airline Consultative Committee <u>https://national-infrastructure-</u>

consenting.planninginspectorate.gov.uk/projects/TR020005/representations/62412

Ref 6 Gatwick Airport Northern Runway Project Representation by easyJet <u>https://national-</u> infrastructure-consenting.planninginspectorate.gov.uk/projects/TR020005/representations/62477) Ref 7 International Airlines Group statistics <u>https://www.iairgroup.com/media/gethmd4t/iag-traffic-</u>

stats-december-2019.pdf

Ref 8 easyJet Annual Report and Accounts 2019, page 31

<u>https://corporate.easyjet.com/files/rights\_issue/2019-annual-report-and-accounts.pdf Page 31</u> Ref 9 Ryanair Annual Report, page 70 <u>https://investor.ryanair.com/results-centre/</u> Annual Report 2020

Ref 10 Department for Transport, Jet Zero Strategy – One Year On, page 11