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London Luton Airport Expansion

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

Infrastructure Planning (Examination Procedure) Rules 2010

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The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

**London Luton Airport Expansion Development Consent
Order 202x**

**8.163 APPLICANT'S RESPONSE TO DEADLINE 6 SUBMISSIONS
APPENDIX A - FRIENDS OF WIGMORE PARK**

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Appendix A – Friends of Wigmore Park [REP6-125, REP6-127, REP6-128 & REP6-129]

Table 1.1 Applicant's response to submission by Friends of Wigmore Park (Issue Specific Hearing 8) [REP6-129] at Deadline 6

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
1	Surface Access and Noise	<p>We mentioned the effects on homes backing onto Eaton Green Road from the new decked car parking planned for the current car hire centre site, the upper floors of which will be on a level with bedroom windows and overlook gardens. How can that level of noise and intrusion be scoped out?</p> <p>We believe that road traffic past those houses will also increase when the link road from the Terminal 2 access road to Eaton Green Road is built. This would mean the cumulative effect from that traffic, the car park and the increase in airport ground noise will mean a significant impact on properties in the area of Eaton Green Road.</p>	<p>Road traffic on the network and accessing the car parks has been modelled and assessed in Chapter 16 of the Environmental Statement [REP1-003]. No significant effects are identified for Eaton Green Road.</p> <p>Noise from car parks is not typically scoped into noise assessments as noise emissions from car park activity tend to be low. Consequently, no assessment of car park noise was undertaken. Some justification for this approach is provided below.</p> <p>As described in ES Chapter 4 The Proposed Development [REP5-012], the new P9 car park will provide staff parking and will be built in two phases:</p> <ol style="list-style-type: none"> a. Work No. 4o(01) will be built in Assessment Phase 1 and provide 1,075 car parking surface level spaces, through the relocation of the car hire centre to the proposed P7 car park, together with reconfiguration of the resulting area to maximise efficiency. b. Work No. 4o(02) will be built in Assessment Phase 2a and provide 1,200 car parking spaces, incorporating the existing TUI car park and partially decking the surface level P9 car park area that was reconfigured in Assessment Phase 1. <p>The reconfigured car parks are broadly located in the same areas as the existing car parks and are at the same distance from sensitive receptors on the opposite side of Eaton Green Road.</p> <p>The existing car park facilities in this area consist of the staff car park (650 spaces), the car hire car park (300 spaces), the TUI car park (500 spaces) and the overflow car park (310 spaces), providing a total of some 1,760 spaces. Car parking provision in this area would decrease from the existing amount of 1,760 to 1,200 spaces in Phase 2a, due to the construction of AAR.</p> <p>The decked car park would allow some cars to park at 1st floor level; however, the car park structure would also provide some benefit due to partial screening of cars at ground level. Whilst there could be an increase in car park noise if car park activity was focused on the decked area adjacent to Eaton Green Road, it is considered unlikely to be a material increase in noise at the nearest sensitive receptors as car parking tends to be focussed near the closest exit to the terminal, which is on the opposite side of the car park to Eaton Green Road.</p> <p>Consideration should also be made to the fact that ambient noise conditions at Eaton Green Road receptors were measured at location ML15 as 65 dB LAeq,16h and 60 dB LAeq,8h during the night (Table 4.5 of ES Appendix 16.1 [AS-096]). During monitoring at ML15, car park noise was not observed to be a noise source (Table 4.1 of ES Appendix 16.1 [AS-096]) with any car park noise masked by the dominant road traffic noise. Consequently, noise conditions as a result of the P9 car park redevelopment would not change materially from the existing noise environment.</p>

Table 1.2: Applicant's response to submission by Friends of Wigmore Park (Reported items in CAH2) [REP6-127] at Deadline 6

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
1	Surface Access	<p>The main through road for the airport is Percival Way, to the north side of this road from Provost Way to Prospect Way; the land usage consists of a few industrial units, the vast majority unused, various small non passenger use car parks, and unused derelict space. This land is ideal for development of a multi-storey car park complex. It is already within the airport footprint, so requires no purchase requirements.</p> <p>It can be developed with no intrusion into current airport operations, and more crucially, no intrusion into the local roads and communities along Eaton Green Road/Wigmore Lane.</p>	<p>The Applicant rejects the suggestion that the area mentioned could be developed with no intrusion into current operations, as many of the plots in this area are currently occupied by third parties or by activities associated with airport operations.</p> <p>The construction of a multi storey car park in this area would also potentially result in visual intrusion and would not be operationally efficient from either a staff or passenger perspective due to its location relative to either the existing or proposed terminal.</p>
2	Surface Access	<p>Passenger routes would be via the same access points as now, as the current route to the Long-Term Car Park runs along Percival Way We believe this shows that WVP does not need to be removed from public use until Phase 2 of the application is actually required, and adequately funded.</p>	<p>The phasing of the Proposed Development means that new areas of parking are required to be constructed at Assessment Phase 1, to accommodate relocated spaces from the existing Long Stay car park associated with amendments to the airside apron, and to provide additional parking spaces in line with airport growth. This is set out within Chapter 8 of the Transport Statement [AS-123].</p>
3	Wigmore Valley Park and Open Space	<p>Review potential informal use of the replacement land and recent signage</p> <p>This land has been in public use for decades; the signage recently applied by the applicant in our opinion shows that they have no idea as to how the public have used that land, because they have had no interest since they acquired that land in 2015. We believe that the inquiry should be made aware that when the applicant acquired this land in 2015, it did so from concession fee income which could have gone to service budgets through the dividend. The actual dividend paid in that year by the Board of Luton Rising was £1.25 Million.</p>	<p>The subject of access and signage was discussed and clarified in Compulsory Acquisition Hearing 2 (see summary in section 4.3 of Applicant's Post Hearing Submission [REP6-064]).</p>
4	Wigmore Valley Park and Open Space	<p>Review of anticipated experience by users of the replacement land over time from the point that it is 'accessible to the public', including potential loss of pathway from Eaton Green Road. The replacement land has been a wilderness of weeds since the applicant acquired it, with a few cuttings per year. It has made no effort to enhance the site since 2015, knowing full well that it is the site of the replacement park. There could have been planting and enhancements done within that timeframe to give the replacement land a head start for when WVP was removed from public access, particularly as we note that 90% of DCO applications are granted. We believe that the omission of the footpath into WVP from Eaton Green Road shows the laxness in the small details of the application.</p>	<p>There is no proposed loss of access from Eaton Green Road as clarified in Compulsory Acquisition Hearing 2 (see summary in section 4.4 of Applicant's Post Hearing Submission [REP6-064]).</p> <p>Following the close of the Examination, the Applicant will await the determination of the Development Consent Order application, which requires approval by the Secretary of State for Transport to implement the proposed Strategic Landscape Masterplan. The delivery of replacement open space and landscape interventions at Wigmore Valley Park would be subject to further detailed design.</p>

Table 1.3: Applicant's response to submission by Friends of Wigmore Park (Specific Hearing 7) [REP6-128] at Deadline 6

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
1	General	<p>“The airport’s head of corporate affairs, Joe Chapman, updated members of Stansted Parish Council at their meeting last Wednesday (Nov 15) – and urged them and other councils to apply for money to help tackle the problem. He revealed the airport had ring-fenced £200,000 to alleviate the nuisance of air passengers parking in streets in towns and villages around the airport to avoid paying parking fees when they fly abroad. Mr Chapman said: “We have transport forums and a sub-group which specifically deal with issues of fly-parking and have made progress with how we tackle this issue, with a significant pot of money ring-fenced to deal with local traffic, but it is the prerogative of local communities and councils to act. We have the money to invest.”</p> <p>He assured councillors that it was working closely with other organisations, including Essex Trading Standards and Uttlesford District Council, to stop “meet and greets” and discourage taxis from picking up passengers from the streets and taking them to the airport”</p> <p>We feel the contrast with Luton could not be greater with the principal difference being that the Council in Luton owns the airport and has made a political decision rather than representing residents’ interests, while the airport operator, unlike Stansted, has no interest in the plight of local communities regarding fly parking.</p>	<p>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).</p>

Table 1.4: Applicant's response to submission by Friends of Wigmore Park (Open Floor Hearing 3) [REP6-125] at Deadline 6

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
1	Economic case and employment	<p>Friends of Wigmore Park, at the Open Hearing Event dated 27th November, were asked to provide a summary of vacancies quoted at the hearing with examples of vacancies at Luton Airport that we believe would not alleviate poverty particularly due to single parent families and communities that traditionally have large families.</p> <p>This was in response to comments made by Robin Porter, the CEO of Luton Borough Council and the ultimate owner of Luton Airport that having additional employment at the airport would help end poverty by 2040. Mr Porter ignored the fact that many people working at the airport are subject to in-work poverty and that the airport, and its partners need a large pool of poor people willing to work for low pay for the airport to remain competitive.</p>	<p>Jobs at the airport cover a variety of functions across a range of employers. As shown in Figure 10 of ES Appendix 11.1 Oxford Economics The Economic Impact of London Luton Airport [APP-079], the average wage of those employed at the airport is above the average wage of all Bedfordshire employees. This pattern of employment shows the airport generating new jobs at a variety of skill and wage levels as the airport grows.</p> <p>The airport operator has been an accredited Real Living Wage employer since 2022 and as such all employment provided through London Luton Airport Operations Ltd is paid at or in excess of the Real Living Wage and employees have access to employee benefit schemes including automatic health benefits.</p>

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
		<p>Examples used at the hearing: Aviation Security Officer Salary £11,769 per annum. Hours 3am to 8am, 4 days on, 4 days off.</p> <p>Car Park Attendants at Luton Airport Salary £11 per hour 2 shift patterns 06:30-18:30 and 18:30 06:30</p> <p>Additional examples not provided at the hearings: Cleaners Salary £10 per hour, day shift or £10.23 per hour night shift, full time Hygiene Operatives Salary £10.90 per hour 16 hours per week.</p> <p>WH Smiths Luton Airport, as an example of a retail vacancy at Luton Airport. Salary up to £10.65 per hour 26.25 or 37.50 hours per week.</p> <p>We can provided many other examples if required.</p>	<p>The airport operator's vacancies are advertised on local job platforms, via the Luton Borough Council website, as well as via the airport website. In 2023 there were over 150 jobs advertised through these platforms including the recruitment of over 125 people within security roles and graduate entry level roles that were advertised at salaries between £25k-£35k per annum, a further 15 roles were advertised at salaries ranging between £35k-£50k that required higher skills or experience levels to meet more supervisory or trade roles and 9 other roles were advertised between £50k-£75k for subject matter experts and senior leadership roles.</p> <p>The Applicant notes that the security role cited by the Friends of Wigmores at a salary of £11,769 is a part time role on a five hour shift pattern, working 17.5 hours a week and is above the living wage level. Every new job generated and paid a salary in excess of the Real Living Wage positively impacts against poverty compared to the position of not being in employment and relying on benefits. This includes having a range of part time and full-time roles that can increase income into the family. In this way, all roles including those cited, contribute to alleviating poverty.</p> <p>Furthermore, the purpose of the Employment and Training Strategy [APP-215] is to develop the skills of local people to enable them to apply for a greater range of skilled jobs as the airport grows.</p>
2	Economics and Employment	<p>The planning application for airport expansion in Phase 1, Phase 2a and 2b is focused primarily on terminal, apron and car park provision and the jobs they will provide. These are traditionally seen as poorly paid work provided in retail, food outlets, check-in, baggage handling, cleaning and security. We believe, using the examples above, that this will not alleviate poverty particularly as many vacancies are seasonal, part time or zero hour contracts to match the different waves of flight times.</p> <p>The airport has suffered many strikes due to low wages that employers are reluctant to raise due to winning contracts from the airport operator or the airlines that are won by submitting the lowest tender.</p>	<p>As per the response provided at ID 1 above, jobs will be created at the airport across a range of skill levels. A high proportion of additional jobs as the airport grows will be in aircrew positions as well as more directly in airport operational and retail activities. In line with all developments that generate jobs, there will be numerically more jobs at the lower end of the pay range than at the upper end, however expansion will create additional posts across the whole range of roles.</p> <p>The airport operator has been an accredited Real Living Wage employer since 2022 and as such all employment provided through London Luton Airport Operations Ltd is paid at or in excess of the Real Living Wage and employees have access to employee benefit schemes including automatic health benefits.</p> <p>The lifetime of the Proposed Development includes various periods of construction, each generating construction related jobs to match construction phases as well as jobs permanently created to support the expansion of the airport. This creates opportunities for those who are looking for careers within the construction industry.</p> <p>The Applicant can confirm that the airport operator has never to date had a strike amongst its employees.</p>
3	Health and Community	<p>This also leads to the question of why there are so many low paid vacancies at the airport at all times of the year when unemployment is deemed to be high in the town. We believe this is down to the fact that the airport operates 24 hours a day, 7 days a week with many unemployed not wanting to work for</p>	<p>ES Chapter 13 Health and Community[AS-078], has assessed the health effects of operational employment at the airport.</p> <p>This assessment considers evidence of poorer health outcomes for those working night-time shifts. The assessment of a moderate beneficial effect takes into account the different types of</p>

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		<p>poor pay on shift patterns that affect their internal circadian clock, health and wellbeing and time spent with their families, particularly at weekends.</p> <p>Recognised health effects of shift patterns include: Fatigue and sleep disorders Obesity Type 2 diabetes Cardiovascular disease Digestive disorders Mental ill health (anxiety, depression) Some evidence to suggest impact on Reproductive health Some evidence to suggest increased incidence of cancer Health and Social Care Information Centre (2014)</p> <p>We provide a NHS link to the above that also looks at the health of shift workers regarding poorly designed shift patterns. We also refer you to a paper written by the Journal of Clinical Sleep medicine.</p>	<p>employment at the airport and notes that positive effects of employment will be experienced to a lesser degree by night shift workers than by those working standard hours.</p>
4	Economics and Employment	<p>We have seen no evidence from the applicant's submission that any consideration has been given to the effects of shift patterns by airport partners that don't follow best practice.</p> <p>Definition of a night worker under working time regulations. A night worker is someone who normally works at least three hours during the night period, which is the period between 11pm to 6am, unless the worker and employer agree a different night period. Night workers should not work more than an average of eight hours in 24-hour period. This average is usually calculated over a 17 week reference period, but it can be over a longer period if the workers and employer agree. Regular overtime is included in the average and workers can't opt out of this limit. Source: ACAS 2017</p> <p>We refer you, as an example, to the vacancy for car park attendants who will be expected to work 12 hour night shifts.</p>	<p>As noted above in the response at ID 3, the Applicant acknowledges that positive effects of employment will be experienced to a lesser degree by night shift workers than by those working standard hours The Applicant acknowledges and welcomes the legislative guidance that is in place to protect employment rights and expects everyone to act accordingly.</p> <p>A variety of shift patterns are in place to cover the 24/7 operational requirements of the airport. For some airport partners this will include the operation of 12 hour day/night shifts and this shift pattern can be achieved within legislative guidelines. The pattern is offered on a rota for 4 days/nights on, followed by 4 days/nights off work and then a new pattern of 4 days/nights. This pattern of working is calculated over a 17 week reference period, including the non-working periods and equates to an average of 6 hours a day. This is below the limit set and is within the working time regulations.</p>
5	Economics and Employment	<p>To counter the reluctance of many people to work at the airport and to reduce the workforce and wage bill, the airport operator and its partners are introducing automation including robotic cleaners, passenger self check-in and retail self-checkouts.</p> <p>Security staff jobs are also under threat due to automation and more advanced passenger screening resulting in the planned reduction of passenger screening lanes from 16 to just 12 despite the approval of 19m passengers per annum.</p>	<p>The Applicant refutes the suggestion that advances in technology and innovation that have been adopted at London Luton Airport are in any negative way linked to the assertion that there is a "reluctance of many people to work at the airport". Retail self-checkouts have become a common feature within many higher volume low cost item retailers and that practice is commonplace throughout the retail sector. Similarly, it has become commonplace for some aspects of cleaning tasks to be undertaken by robotic cleaners. The trend for greater automation and for advances and innovation in processing passengers has been ongoing for a considerable period.</p> <p>Specifically in relation to security employees it may be of benefit to note that initiatives such as the Next Generation security lanes that are mentioned are more resource intensive than existing security lanes and that overall, the airport operator is increasing security numbers in 2024.</p> <p>Innovation within the sector has been considered and the Applicant can confirm that anticipated future productivity improvements in different categories of employment associated with the</p>

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			airport have been considered by Oxford Economics [APP-079] in projecting future levels of employment.
6	Economics and Employment	<p>In Arrivals, passengers can now scan their own passports so again reducing the need for Border Force Officers. During 2017 Luton introduced self-service bag drop so reducing the need for check-in staff. Easyjet, Ryanair and Wizz now all use self check-in via their handling agents to reduce the staff required for manual check-in.</p> <p>In 2021 Stansted took this a stage further</p> <p>Stansted has introduced automated baggage systems as moving baggage manually to and from the airport terminal to the aircraft is time-consuming, costly and labour-intensive. Automating check-in conveyors, baggage screening, sorting, make-up and reclaim is proven to improve process efficiency. Luton used to have two flight catering companies that provided on-board meals for passengers that closed due to the rise of low-cost airlines at Luton.</p>	<p>The trend for greater automation is prevalent throughout the wider economy and increased automation within airport ground operations has been ongoing for a long time. Anticipated future productivity improvements in different categories of employment associated with the airport have been considered by Oxford Economics [APP-079] in projecting future levels of employment. It should be noted that many of the new jobs will be directly related to the operation of aircraft and the scope for automation in this area is limited by the need to meet safety standards in the air that require minimum staffing levels according to the number of passengers on each aircraft.</p>
7	Economics and Employment	<p>Other jobs on the decline are highly skilled aircraft maintenance staff; employment has been on a decline at Luton for many years with most hangars now being used purely for aircraft storage or have been demolished to create aircraft stands and an executive terminal, Demolished hangars: Hangar 62 Hangar 63 Hangar 102 Hangars used for aircraft storage: Hangar 7 Hangar 8 Hangar 125 (does offer limited man in a van maintenance by third party provider) Hangar 129 Hangars out of Use: Hangar 9 Hangar 60 Hangar 127 Hangars still being used by airlines for maintenance: Hangar 61 (TUI) Hangar 89 (easyJet) Hangars used principally for storage but with limited line and base maintenance. Hangar 201(Harrods) Hangar 202(Harrods). Self-driving vehicles are not far away so we would also challenge the predicted jobs airport expansion will actually provide.</p>	<p>The Proposed Development does not involve any further demolition of maintenance hangars and includes construction of two additional hangars to ensure sufficient space to maintain the growing fleet of aircraft that would be based at the Airport.</p> <p>Although some hangarage is currently not being fully used in part due to the collapse of Monarch Aircraft Engineering in 2019, hangar space is being productively used. Hangars will be refurbished and brought back into full use again as the airport grows past 2019 traffic levels and in line with demand from airline customers.</p>
8	Economics and Employment	<p>In this photograph of Provost Way, which is located at the Airport Business Park, every building seen has been abandoned for a number of years. Buildings seen include former 2 inflight catering companies. Britannia Airways former flight simulator building. The black building on the immediate right has been abandoned for so long that we can't remember its former use. The building on the left is subject to, we believe, a compulsory purchase order and is vacant apart from a café in the offices associated with this building.</p> <p>We view this brownfield land as the ideal location for airport parking and a new business park yet the applicant has no plans for this site apart from adding a dual carriageway.</p>	<p>The proposed alignment of the Airport Access Road (AAR) means that some areas will inevitably be affected, which includes several of the existing buildings which are accessed from Percival Way, Provost Way and Prospect Way. AAR is required to access the proposed new terminal and therefore the creation of a new access road is necessary, which in turn requires demolition of several disused buildings in the vicinity of Provost Way.</p> <p>Whilst many of the buildings in this area are currently not in use, the airport operator is utilising various areas for operational uses, including but not limited to taxi ranking, internal storage and staff parking. It is recognised that some of the buildings are in a poor condition, however, it was deemed inappropriate to invest on refurbishment of the buildings when several need to be demolished to create the AAR alignment. It is also difficult / not commercially viable to obtain short term leases for buildings when potential tenants need to vacate a building to enable construction of AAR in the near future.</p>

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			<p>The Applicant disagrees that there are no plans for this site; several areas of replacement car parking, to replace parking spaces affected by the proposed alignment of AAR, are proposed in the vicinity of Provost Way (Work No. 4t(01), 4t(02), 4t(06)). However, the creation of large areas of airport parking or a business park in this location would not be spatially or operationally efficient and as such this was not progressed as an option.</p>