



Planning Inspectorate  
Submitted online  
02 February 2024

## **Re: Future LuToN – London Luton Airport Expansion DCO**

### **About DHL**

DHL is part of DHL Group and is the leading global brand in the logistics industry. Our DHL divisions offer an unrivalled portfolio of logistics services ranging from national and international parcel delivery, e-commerce shipping and fulfilment solutions, international express, road, air and ocean transport to industrial supply chain management.

As a group we employ approximately 600,000 people in more than 220 countries and territories worldwide, DHL connects people and businesses securely and reliably, enabling global sustainable trade flows. With specialized solutions for growth markets and industries including technology, life sciences and healthcare, engineering, manufacturing & energy, auto-mobility and retail, DHL is decisively positioned as “The logistics company for the world.”

In the UK, we employ over 50,000 people across 450 locations. We operate one of the largest multimodal fleets, with c. 11,000 road vehicles across our network and 39 dedicated air routes. DHL operates across all sectors of the economy facilitating UK economic growth. This submission relates to DHL Express, the international parcel divisions of DHL.

### **Economic value of night flights at Luton Airport**

DHL would like to highlight the value of night flights and the role of Luton Airport in supporting UK businesses and enabling international trade. Night flights are driven by demand and consumer preferences. The ability to provide time-definite, next day delivery services relies on night flights, making them a necessity for express operators rather than operational preference. In 2021 it was estimated night flying across the UK generates £16.5bn in GVA and supports over 200,000 jobs ([York Aviation](#)).

Express parcel services, which rely on night flights, support UK businesses trade internationally. A recent survey of express customers found that more than nine in ten (93%) believe express services are vital or important to their competitiveness with 89% citing speed of delivery as the key reason for using express services. ([AICES/York Aviation](#)).

In this context night flights at Luton Airport make up a critical part of DHL’s UK network. DHL operates a small number of flights into and out of Luton Airport in the early hours of the morning. These flights are a critical link within our European and Global network. The shipments we move on our flights are predominantly high value and time definite parcels.



Many are sent from business to business, with a growing proportion being sent from business to consumer as the e-commerce market grows. We service a number of key sectors, supporting jobs, growth and also wellbeing. Some examples include:

- Medical supplies, pharmaceutical products or life sciences samples. Some of these samples only have a viability of 24-48 hours and so have to be transported as quickly as possible.
- Components required by manufacturing companies e.g. components urgently required for the automotive, aerospace, telecoms industries to keep production running.
- Financial or legal documents for the City. These continue to be exchanged and signed in hard copy, even in the digital era.
- Supporting the ecommerce industry with just in time delivery, supporting the British fashion industry.

The services we offer our customers include pre 9am delivery and pre 12pm delivery, both of which rely on our ability to maintain efficient and time definite air and road movements. We rely on early morning inbound flights at Luton in order to ensure shipments can be sorted and distributed on time. Many of these shipments are distributed to businesses and consumers in Luton and the surrounding area, as well as London and the South East more broadly. Our flights are timed to enable maximum connectivity from our feeder flights from Europe and the Far East.

While the vast majority of shipments arriving at Luton Airport are destined for the UK, our inbound flights provide a crucial connection for shipments destined beyond the UK via transshipments which link on to further flights at Heathrow. These shipments connect to Australia, New Zealand, Egypt, the USA, Canada Bangladesh, Pakistan, India and South Africa among others. Transfer shipments help to ensure the UK's continued status as an aviation Hub, facilitating direct and frequent links between the UK and a number of key markets. This transfer volume not only helps to create local jobs but also the continued high connectivity available to UK businesses and consumers.

In 2021 DHL invested in a new service centre approximately 5 miles from Luton town centre which is fed directly from the gateway at the airport. We now have the ability to sort and distribute material bound for the local area from our inbound flights directly at the Luton service centre and also truck material destined for elsewhere at our Southern Distribution Centre at Heathrow. The new site at Luton totals 7,500m<sup>2</sup> a significant increase from our previous site footprint of 1,400m<sup>2</sup>. We operate 8 courier routes across the area of Luton Council and 74 across Bedfordshire, Buckinghamshire and Hertfordshire. The site employs c. 60 people and we employ a further 20 people at the airport to sort the shipments once unloaded from the aircraft.

Maintaining access to night flights at Luton Airport is of critical importance to our customers and the ability of UK businesses to trade internationally. We recognise the environmental impacts, including noise, of our flights and take all available steps to reduce impacts. This includes using techniques such as continuous descent approach, reduced power take offs, re-equipping the air fleet with quieter engines and investing in air fleet improvements.



We work collaboratively with the airport and support their ambition for sustainable growth. It is our view that the expansion plan of Luton Airport, including the provision for express cargo operations in the night period, should be approved.

Yours sincerely,



**Allan Smillie**

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DHL Hubs & Gateways UK