

INTRODUCTION

LADACAN was formed in 1968 in response to the widespread local anger at a sudden increase in noise disturbance from the then small airfield at Luton with the introduction of jet aircraft there, followed soon after by an explosion in package tour traffic. Many will say that since those days jet aircraft have, thankfully, become less noisy – individually maybe so but the vast increase in the number of flights has meant that many residents in a large area surrounding Luton still find the intrusion sufficiently annoying to log noise complaints with the airport management there and to contact us through our website (www.ladacan.org, e-mail info@ladacan.org). We have been active in various campaigns over the years, have a position on both the quarterly Consultative Committee and its technical sub-committee, the Noise Track Sub-committee at both of which we have a 100% attendance record over many years. We also have the usual contacts with the local media.

Although our main remit is plainly to be concerned about the noise impact of aircraft operating from Luton, we have inevitably accumulated some expertise in other areas mentioned in the series of questions at the end of the Consultation document and although we will not attempt to comment on all such, where we feel we have a worthwhile input we have indeed made such comments mindful of the need to support them where possible with original evidence.

Our response to the questions raised on pp37-42 in the document:

The aviation sector

5.1 How does the aviation sector as a whole benefit the UK? Please consider the whole range of aviation activities including, for example, air freight, General Aviation and aerospace.

Far less than the aviation industry itself would have us believe and it is important to note, as we will in our answers to later questions, that the much vaunted “benefits” are much less when set against the many disbenefits, economic (e.g. the “tourism deficit”) and environmental (for those who live close to its activities).

5.2 What do you consider to be the aviation sector’s most important contributions to economic growth and social well-being?

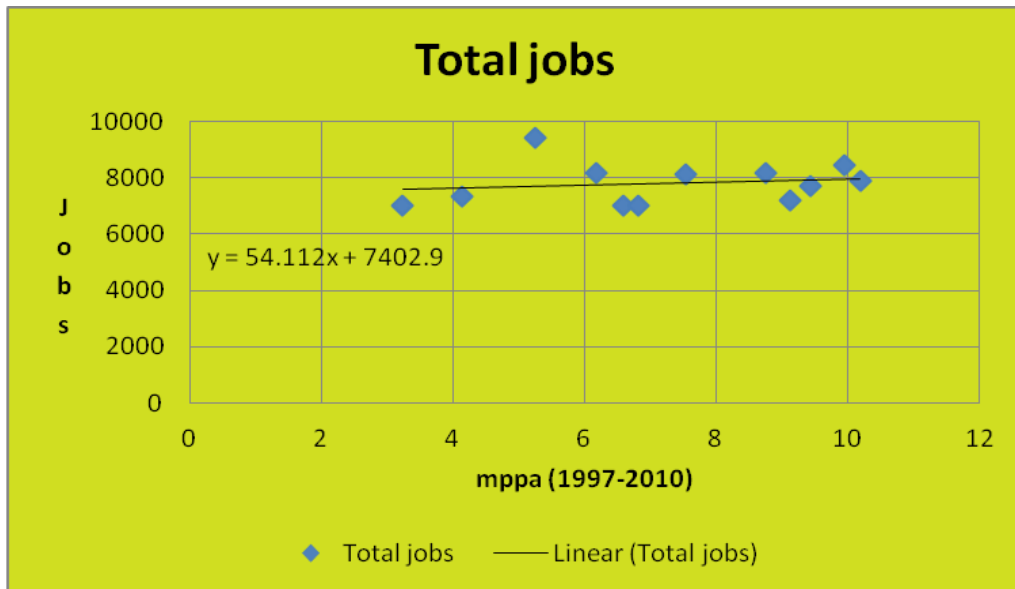
There can be no doubt that travel broadens the mind. In this respect the airline industry has helped social well-being. This may also be the case with holidays abroad and accommodation abroad, though the result may be the economic disadvantages to the UK of the tourism deficit (as referred to at length in the GACC & AW evidence papers).

The aviation industry creates jobs for UK residents, just like the railways did in the 19th century. Many of these jobs are high skill, e.g. maintenance & flight crew, and many others are low skill, e.g. baggage handling & security, thus providing a good range of employment opportunities. However, there is one myth that needs to be exposed, and that is the rate at which jobs are created as the industry expands.

Luton provides jobs data in its Annual Monitoring Reports (AMRs) going back to 1979. 1995 was the start of easyJet services from Luton and marks the start of the modern era for Luton operations, that is, the predominance of low cost airline operations. Growth was slow in that year but really took

hold in 1997. Below we have plotted the number of jobs against number of passengers for each year since 1997 (except 2002 and 2005 for which no data was provided) as stated in the AMRs. The formula for the trend line is shown.

The straight line trend seems like a good correlation for the data except for 1 aberrant year in 1999 (for which the explanation is construction activity that year). As can be seen, the growth in jobs has been approximately 54 jobs for every mppa. Perhaps of relevance, this is over a period when the number of passengers per flight has increased from 91 to 122.



Added to further productivity gains (we concur with paragraph 2.10 of SSE’s “Aviation, Jobs & the Economy”) it seems unlikely that this sort of number will be exceeded in future. Indeed, page 3 of the SSE document shows the number of jobs at Stansted fell from 14,000 in 1983 to just 11,700 in 2007, despite a 9 mppa increase in passengers. Though it may be true, that the attraction of other operations like tourism HO’s (one is already included in the figures above) can be due to the airport being in Luton, this parochial view ignores the fact that these jobs could be anywhere and are thus not “created”, and do not result from airport expansion at all.

LADACAN has, for a number of years, provided projections of employment at Luton Airport based on the analysis method employed by Halcrow for the East of England Regional Assembly. Our projections employ successive annual job figures published in the AMRs by Luton Borough Council and the DfT’s revised projections of passenger traffic. The most recent of these can be viewed on our web site (ladacan.org) and predicts that employment will decline substantially over the next 20 years despite traffic increases.

5.3 Are some sub-sectors of aviation more important than others? If so, which and why?

Clearly, aviation enables UK and foreign companies to do business so business travel is by far its most important function. However, as only 25 per cent of passengers at UK airports are travelling on business (CAA survey, 2008), we do not believe that the over-half of UK residents who do not fly should subsidise the aviation industry through its favourable tax treatment, immunity from bearing local and global environmental costs and public subsidy of infrastructure (eg road and rail access to airports).

5.4 How do you think the global aviation sector will evolve in the medium and long term (twenty to fifty years)? What do you expect to be the most significant changes?

As air space becomes progressively more congested and the price of oil, and hence of aviation fuel, increases, there may well be a drift to using fewer larger aircraft especially on the busier routes to reduce the energy cost per passenger. In the case of short-haul both within the UK and to large areas of the near-Continent, we would expect high-speed rail to take an increasing proportion of the passengers currently using air (rather as in France the TGV network has greatly reduced air passenger traffic on distances up to ca. 300 miles or so) something which has major environmental benefits which we shall mention later. Hopefully those managing aviation will gradually come to realise that the free-for-all, apparently unconstrained expansion of recent years cannot continue: it is even possible the sheer inconvenience of lengthy security queues and the hassle of boarding very large aircraft may gradually impact on the public's desire to fly but more worryingly may encourage yet more Executive-jet style travel by those who can afford it, either the tax-allowed business travel or the over-rich celebrity-culture brigade.

Overall the industry will have to get out of its mindset of continuous and largely unrestrained growth, much of it leisure travel on budget airlines, as follows:

Business Travel – the recent drift from scheduled services to just two or three individuals using an Executive Jet is plainly nonsensical in terms of individual carbon footprint and the noise imposed on nearby localities, just for those two or three individuals' convenience (such as avoiding lengthy security queues at the major airports) and needs to be redressed by some form of taxation. That is where the per plane APD replacement would have been a very sensible way forward.

Leisure Travel – any alleged economic benefit from the aviation sector is massively undermined by the very large tourism deficit accrued by leisure travel from the UK outwards (ca. £20bn p.a.); in a sense a massive export of the UK's wealth not to say undermining our own holiday industry and the many jobs it itself supports. This is not to deny those families who wish an annual holiday abroad but somehow "the frequent flyer" brigade must and should surely be deterred from using this most important transport sector for trivial stag party-style trips abroad. Since it is very easy to book a series of very cheap tickets some months in advance for weekends in holiday homes or on golfing weekends some way of increasing the tax take from such activity will need to be found – and indeed would seem to be fairer to those, more than half the population, who rarely, if ever, fly and in a sense cross-subsidise the frequent flyers. Two recent surveys have shown that appealing to the environmental conscience of such folk is pointless. Two reports submitted August 2009 at a Royal Geographical Society seminar – (a) a University of Exeter in-depth series of interviews of 200 individuals with widely differing attitudes to environmental matters) (s.w.barr@Exeter.ac.uk) and (b) a similar survey of 605 East Midlands residents by Loughborough University (by Dr. T.J. Ryley, Dept. of Civil and Building Engineering) - both found that even those individuals considering themselves to be environmentally conscious, such as re-cycling etc. when at home and even understood the climate damage caused by aviation, were unperturbed by those concerns and stated quite openly that that would not prevent them flying as often as they wished and that only a significant increase in price would do so. Hence Government should have the courage, or some would say good sense, to increase the tax take on the grounds of fairness to those who don't, or rarely, fly and to help fill the UK's currently severely depleted coffers.

5.5 How, and within what constraints, can aviation growth occur as technological developments and improved operating procedures reduce CO₂, pollutant emissions and noise impacts?

Increasing the stringent regulation, often originating from the EU, on pollutant emissions should force the industry to invest in those technical developments which may help reduce such emissions and perhaps further increase the efficiency of the engines such that one gets more power per ton of fuel and thereby less CO₂: the increase in energy efficiency would in any case be in the industry's interest. However it is important that such technical improvements on emissions should not at the same time lead to a worsening of the noise generated by the particular engine design. In recent years, technical developments have generally been outstripped by overall growth and the only real hope of reducing future CO₂ emissions is by a shift to far larger aircraft for long-haul and transfer of much short-haul to the far more energy-efficient (by around tenfold, depending on load factor) high-speed rail networks here and on the near Continent. Meanwhile, the aviation industry should be expected to finance such technical developments under the "Polluter Pays Principle" and as in a series of aviation documents emanating from the Government dating from 1998 through to 2004 that in line with that principle, the aviation industry should "cover its external including environmental costs" (e.g. in the then DETR's document "Valuing the External Costs of Aviation" of December 2000 and the joint HMT/DfT March 2003 document "Aviation and the Environment – Using Economic Instruments" which at Item 1.3 states "that the polluter should pay and aviation, like other industries, should meet its external, including environmental, costs").

5.6 How should decision-makers address trade-offs or competing interests, where these occur both (a) between different aviation objectives, e.g. CO₂ emissions versus local noise reduction, and (b) between aviation and other sectors, e.g. airspace use versus renewable energy objectives, or the use of land for maintaining a viable network of smaller airfields versus housing development?

Decision-makers will have to ensure that realistic costs for all of these "consumables" are born by the aviation industry.

5.7 Should some aspects of UK aviation be considered to be of strategic national interest (e.g. certain airports, air traffic control)? If so, based on what criteria?

5.8 How might the cost of regulation to the aviation sector be reduced, while achieving the Government's objectives of promoting sustainable aviation, improving the passenger experience at airports, and maintaining high standards of safety and security for passengers and freight?

Before being concerned about the cost of regulation, we believe the Government should seek adequate regulation of the industry. Aviation clearly avoids the costs which it imposes on society through its climate change emissions and its health and risk impacts on communities around airports. Stricter planning controls and criteria for noise and crash risk should be set nationally together with mechanisms for enforcing them to include mitigation and compensation.

International connectivity and hub airports

5.9 How important are air transport connections – both international and domestic – to the UK at both national and regional levels?

5.10 As long as people and goods can easily reach their desired destination from the UK, does it matter if they use a foreign rather than a UK hub airport?

5.11 Are direct connections from the UK to some international destinations more important than others? If so, which and why?

5.12 How will the UK's connectivity needs change in the light of global developments in the medium and long term (twenty to fifty years)?

5.13 What are the benefits of maintaining a hub airport in the UK?

5.14 How important are transfer and transit passengers to the UK economy?

5.15 What are the relative merits of a hub versus a point-to-point airport?

5.16 Would it be possible to establish a new 'virtual' hub airport in the UK with better connectivity between existing London and / or major regional airports? Could another UK airport take on a limited hub role? What would be the benefits and other impacts?

Regional connectivity and regional airports

5.17 Can regional airports absorb some of the demand pressures from constrained airports in the south-east? What conditions would facilitate this?

5.18 What more can be done – and by whom – to encourage a switch from domestic air travel to rail?

In the sense that a city centre to city centre journey of up to 300 miles is even now often quicker by rail than air and that many such rail services are now far more frequent than equivalent air service (e.g. every half hour from London to places such as Newcastle and Leeds) it should be a simple matter to encourage the switch from domestic air travel to rail. The stumbling block is of course cost though even now some rail companies are beginning to emulate the airlines marketing ploy of selling at least some tickets in advance at a very competitive price. However, it seems quite iniquitous that rail travel which is around ten times more energy efficient (depending on load factors etc.) than domestic air with the latter additionally causing more climate change problems than equivalent emissions at ground level (see later) it would seem only reasonable to increase the cost of domestic air travel by some form of taxation i.e. to pay for the environmental damage caused, "external costs", see 5.5. We would suggest the immediate imposition of VAT on domestic mainland (i.e. excluding Scottish etc. islands) and ideally a "Polluter Pays" (see Q.5.5) carbon tax (as in Sweden?). However we recognise the realities of the situation and it may simply be that an incremental increase in APD or similar is all that one can hope for as suggestions such as an aviation fuel tax imposed solely in this country would be impractical. Again ultimately one might hope that an EU-wide aviation fuel tax, as mooted two years ago in the European Parliament, might be instituted at that level which would deter "tankering" fuel (although Switzerland would have to be persuaded to fall into line in that respect).

5.19 How could the benefits from any future high speed rail network be maximised for aviation?

We think it dangerous to have such a network feeding into e.g. LHR from the West Midlands as it would simply encourage those from that area to desert their own regional airport on the grounds that Heathrow has a better service to many places: indeed we do not think there should be any “benefits” to the aviation industry – such a rail network should be used to reduce domestic aviation and needs to have minimal intermediate stops.

5.20 How can regional airports and the aviation sector as a whole support the rebalancing of the economy across the UK?**Making better use of existing capacity**

5.21 To what extent do UK airports meet the needs of their customers? How might those needs be more effectively met within existing capacity? What is the right balance between competition and regulation?

5.22 Can we extract more capacity out of the UK’s existing airport infrastructure? Can we do this in a way which is environmentally acceptable? To what extent might demand management measures help achieve this?

Luton, for example, has spare capacity during off-peak daytime and at night. Unfortunately, evidence shows that this is difficult to use in an environmentally friendly way without robust limits being applied. As an example, the abolition of Chapter 2 aircraft throughout the EU was designed to reduce the noise burden on populations and yet the airline industry has used up the available noise capacity by flying more aircraft. The table below shows how, between 2000 and 2008 (the peak movements year at Luton) the whole of the available noise capacity has been used up, and how the night noise position is actually significantly worse. Indeed, the number of people affected by night noise at or above the 57 dB L_{eq} contour, has increased from 79 people in 2001 to 1,101 people in 2010! For this reason expansion at night needs to be avoided.

This example is based on the discredited L_{eq} noise indicator (see answer to question 5.43) so the real increase in disturbance has been very much worse.

Year	Annual Movements	57 dB L_{eq} day population	48 dB L_{eq} night population
2000	85,148	8,095	10,028
2001	83,884	2,339	7,734
2002	80,920	2,341	6,264
2003	85,469	3,241	8,054
2004	94,298	3,773	6,731
2005	107,894	2,631	7,508
2006	116,132	2,969	8,187
2007	120,243	4,431	9,588
2008	117,861	5,295	12,859

Note: Movements is the total annual whereas the L_{eq} contours only relate to the summer 92 day period.

5.23 How can we support Heathrow’s hub status within the constraints of its existing capacity? Can we do this in a way which is environmentally acceptable?

5.24 How important is increased resilience at the UK's major airports to reduce delays? How best could resilience be improved with existing capacity, e.g. how might trade-offs between existing capacity and resilience play a role in this?

5.25 Could resilience become an issue at regional airports? If so, how might this be avoided?

5.26 Could existing airport capacity be more efficiently used by changing the slot allocation process, for example, if the European Commission were to alter grandfather rights? If so, what process of slot allocation should replace it?

5.27 What provision, if any, should be made for regional access into congested airports?

5.28 What provision, if any, should be made for General and Business Aviation access into congested airports?

No such provision should be made – indeed as indicated under Q.5.5, GA represents a disgracefully inefficient use of fuel and of airport capacity (a planeload of 200/300 holidaymakers versus the departure of a single GA plane with two or three individuals with their massive individual carbon footprints).

5.29 What is the role of airspace design and air traffic management in making better use of existing capacity?

Climate change impacts

5.30 What do you consider to be the most significant impacts of aviation, including its non-CO₂ emissions, on climate change? How can these impacts best be addressed?

Despite much of the aviation industry still being in obstinate denial, it would seem virtually all the experts in the world agree that high-altitude emissions from aircraft have a larger affect due to Radiative Forcing than similar such emissions emitted at ground level. The best established such multiplier is x2.7 originating from the series of IPCC Reports from late 1990s onwards and they seem not to have changed their views on this. Some others have suggested a much bigger multiplier, x4.9 from a recent Transport and the Environment article but even if one assumes the smaller figure of x1.9 as in the Government-sponsored Stern Review, it seems undeniable that high-altitude flight has a disproportionate climate change impact. This will be largely due to the massive CO₂ emission from the burnt fuel but also from the nitrous oxide (and possibly even the Nox) emissions in that exhaust. It seems to us totally iniquitous that the CCC seems content that the aviation industry's 2050 emissions need to be no better than its 2005 baseline even when industry and indeed domestic users are being asked to reduce their CO₂ emissions by a full 80% by 2050. The rest of industry will presumably need to reduce its CO₂ emissions by 90% by that time to make up for the inability or unwillingness of the aviation industry to conform to the far stricter regime. Sadly it seems the aviation industry has a mindset that somehow it is a special case! We in the UK have particular reason to be concerned about the impact of CO₂ induced climate change from aviation, and indeed other sources, in that we are particularly vulnerable to the resulting sea level rise along our largely low lying East coast. The extensive vapour trails often seen in the evening straddling the sky here, and often spreading into cirrus-like formations, are known to reduce overnight cooling, and hence

overall global warming, but flying lower to minimise their production simply increases fuel burn and is plainly impractical.

5.31 What role should aviation play relative to other sectors of the economy in reducing greenhouse gas emissions in the medium and long term?

We see no reason why aviation should be considered a special case. It should play an equal part to other industry sectors but, in aviation's case, based on a x2 multiplier effect as indicated above.

5.32 How effective do you believe the EU ETS will be in addressing the climate impacts of aviation? Should the UK consider unilateral measures in addition to the EU ETS? If so, what?

Unfortunately, as it stands the EU ETS will have very little impact because the nominal cost of carbon emissions is far too low and being a trading scheme all that the aviation industry needs to do is to buy carbon credits from other increasingly energy-efficient, or failing, industries within the EU. The UK Government should press for the carbon price within the ETS to be increased appropriately so that the overall scheme has a much bigger impact than currently. As to other measures, the possibility of putting VAT on domestic air tickets has already been noted under 5.5 along with other possibilities. The attractive idea of also putting VAT on aviation fuel taken on board within the UK seems unlikely to be practical as it would simply lead to tankering.

5.33 What is the best way to define and quantify the UK's share of the CO₂ emissions generated from international aviation?

The impact of budget airlines and the desire of many to fly to the sun means that a disproportionate number of passengers using our airports (possibly around three quarters - passport statistics) are UK citizens – as one might expect from the "Tourism Deficit" figures. Others may have a more accurate idea but one should really also include the "carbon content" for the very large quantities of goods air freighted in from abroad to this country for UK consumers – again a very difficult statistical exercise where possibly, rather than employing expensive consultants, one could make an approximate estimate from the air freight traffic handled by e.g. LHR and other major air freight airports.

5.34 What is the potential for increased use of sustainable biofuels in aviation and over what timeframe? What are the barriers to bringing this about? 5.35 What mechanisms could the Government use to increase the rate of uptake of sustainable biofuels in the aviation sector? In particular, how can we accelerate the successful development of second generation biofuels?

Unsurprisingly, there is growing public opposition to the use of good agricultural land which could be used for growing food, for an increasing global population, to produce "traditional" bio-fuels in aviation or indeed elsewhere. The possibility of producing "sustainable" bio-fuels (from algae, etc.?) in sufficient quantities to be of any use seem to us so far away as not to come into the equation.

5.36 Which technologies (e.g. for aircraft and air traffic management) have the most potential to help reduce aviation's CO₂ emissions (noting potential trade-offs with local environmental impacts)?

Improving routeing and reducing stacking sound like good ideas but in the very crowded SE airspace there would appear to be very little opportunity for so doing. Additionally there is a danger that new

routes will overfly at a low enough level to cause irritation to populations newly exposed. Overall the aviation industry needs to face up to the fact that there are too many aircraft in the skies, particularly in the crowded SE corner of the country. As we have said before severely constraining the drift (e.g. by taxes of some form) from scheduled flights to Executive Jets for the favoured few, all of which take airspace almost equivalent to a typical commercial airliner, is essential. Luton operates a noise violation system of fines variously for day and night operations, the fine typically being three or even five times the normal runway charge imposed on the operator concerned. The noise thresholds at which these fines are imposed have been slightly tightened recently at Luton and we are pressing for incremental such tightening over future years. Such a system rightly penalises those operators who continue to use old and noisy aircraft which cause the most disturbance: the only drawback is that in our view such fines should go to a fund for the sound insulation of particularly badly affected houses, not to the Airport.

5.37 What more could be done to encourage the aviation industry to adopt new technology to reduce its climate change impacts?

Set challenging, enforceable, clear targets with a short, and monitored timeframe to improve engine efficiency (but without the downside of worse noise emissions!) remembering that replacing existing, possibly slightly less efficient, engines with newly-manufactured ones could overall be counterproductive. Reducing airframe drag would also be helpful but since most planes currently flying are of relatively recent construction and have a long lifetime it will be many years before much progress can be made on that front.

5.38 What more can the UK aviation industry do to reduce the climate change impact of its ground operations and surface access to and from the airport (which can also help reduce local environmental impacts)?

Increase the cost of car parking, both on and off site (e.g. at Luton there is a large off-site “Airpark” with a bus shuttle to the Terminal), so as to encourage whole-journey public transport access. Otherwise, as at Luton, passengers are seduced by the considerable convenience of throwing the luggage in the boot and driving to the airport (by far the majority at Luton and most other airports still) and again, as at Luton, often causing major traffic congestion with queuing cars waiting to access the terminal area and often spilling over into the nearby public highways. Thus again at Luton, £25m of public money was spent on a dedicated access road but all that has done of course has to increase the temptation to drive there. This road used the corridor which had been earmarked for a “people mover” link to the Airport railway station so we consider that “joined up” planning is needed.

5.39 What scope is there to influence people and industry to make choices aimed at reducing aviation’s climate change impacts, e.g. modal shift, alternatives to travel, better information for passengers, fuller planes, airspace management (which can also help reduce local environmental impacts)?

Modal shift –we have already noted, under 5.18, that even the current rail system is time-competitive for city centre to city centre travel up to around 300 miles on the main routes but needs further encouragement to tip the balance from what is perceived as very cheap air travel to what seems to be more expensive rail – this by e.g. imposing VAT on domestic air tickets, some form of

carbon tax, etc. as discussed before. Short-haul to the near Continent has even more, and increasing, possibilities as additional high-speed links are brought into use in Belgium, Germany, etc. Unfortunately our (admittedly subjective) impression is that booking rail tickets through e.g. Rail Europe is rather more difficult, possibly due to the complexity of destinations available, than for air. Alternatives – such as video-conferencing are already in place for business and may get more popular as air tickets become more expensive, and for families wishing to see distant relatives, Skype etc. technology is likely to improve and itself provide an alternative to a long-haul flight. And we would add not only fuller but larger planes.

Local impacts

5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

For communities close to airports, easy access to air travel is a limited benefit as their socio-economic profile is, in our estimation, heavily skewed to the over half of UK residents who never fly. Overwhelmingly the impacts are negative with noise being the most troublesome causing disruption to sleep, health and educational achievement. These communities also experience high levels of risk from aircraft accident and congestion of local rail services and roads. Air and water pollution are other potential risks.

Airports employ few people in relation to their land use so, where employment land is in short supply as at Luton, they restrict employment opportunities – Luton Borough Council estimated that 8,200 people were employed in and around the airport in 2010 while the figures it employed in its draft Local Development Framework (LDF) would have permitted the land dedicated to the Airport to provide more than 3 times this number. Extra land at the ends of runways is “sterilised” for the most beneficial land uses by noise and crash risk. At Luton, the construction of an airport station is now leading to the conversion of employment land to housing development for commuters to London (eg Napier Park, the former Vauxhall site, and Stirling Place).

Further, the erroneous belief among Councillors that airports are good for the local economy leads to decisions in which public money is ploughed into infrastructure and planning decisions which benefit the airport operator. At Luton, £25 million of public money was spent on a new road to the Airport with the Airport operator contributing £350,000. The Council is now promoting a project to improve Junction 10a of the M1 with no contribution by the Airport despite its generating half of the road traffic.

The Government must impose limits on the environmental impacts on communities and legislate for mitigation and compensation where they are exceeded. The laissez-faire approach in which Government leaves regulation to local authorities with minimal guidance simply does not work because planning officers lack technical capability and can only address these issues in the context of a planning application, an infrequent event. In any case, the people who live near Luton Airport are no different in their collective reaction to, for example, noise and so have a right expect the same protection as enjoyed by those near other airports. Local authorities have mixed motivations and responsibilities in the planning system and, in some cases of which Luton is one, a direct financial

interest in the airport. They cannot be allowed to foster unfair competition between airports through differences in standards of protection for communities.

5.41 Do you think that current arrangements for local engagement on aviation issues, e.g. through airport consultative committees and the development of airport master plans, are effective? Could more be done to improve community engagement on issues such as noise and air quality? If so, what and by whom?

Luton is an airport without a Master Plan (MP), so clearly the current arrangements re MPs is ineffective. This is a disgrace from a planning perspective as Luton has recently been trying to develop its Local Development Framework (LDF) in the absence of any clear statement of what the airport intends to do. Is this part of the reason why the draft LDF Examination in Public has been withdrawn, and is now being re-written?

As for Airport Consultative Committees, LADACAN has sat on Luton's for almost 20 years. To say they are ineffective is an understatement. We see their value mainly as a means of gaining information. Influencing the airport is negligible and the airport operator seems to see the committee as a marketing opportunity. Few of the attendees make a contribution (a very expensive waste of Councillors' and Officers' time) with the only active and technical input being by local residents' groups. Even the airlines seem to be distant from its activities as their representatives often fail to attend.

The administration is also an issue. Not only does Luton Borough Council have a vested interest as it leases out the airfield but the Chairman is chosen and paid by the Airport, and secretarial services are provided by the Airport. Minutes are produced by and edited by the Airport before publication, hardly an independent exercise.

We would suggest that Consultative Committees be established on a statutory basis, paid for by the airport, including representatives from neighbouring authorities, aviation interests and residents and environmental groups in equal numbers, and with independent secretariats and Chairmen elected annually by the Committees from among members.

One of LADACAN's members recently resigned from the Noise & Track Sub-Committee (NTSC) after 10 years, and though a particular issue was the main cause, his letter to the Chairman also explains the perceptions of his years on the committee. An extract from the letter is given below as evidence of what has happened at Luton.

"Unfortunately, I have had enough, and for my sanity and health will not be representing LADACAN at NTSC in future. In my view the meetings are process, not achievement, driven. They will only ever achieve something meaningful if the parties to it really want to. It is clear that LLAOL consider this a time consuming chore to be rebuffed and delayed at every opportunity. Even the NAP, of which they seem so proud, will not actually make one iota of difference to the noise environment (feel the length of the list of actions, not the impact of their outcomes). And the Night Noise Policy may reduce the noisiest flights (perhaps 14 a year out of 7500) but will leave thousands of people still disturbed at night and only end up with these flights replaced by a larger number of marginally quieter but still disturbing aircraft movements.

"I wish you well, but perhaps this experience will show why complaint fatigue occurs and how, if even the hardest of us feel defeated, it is no surprise that local confidence in LLAOL is so low. I am reminded of the comments made by members of the public at the LADACAN AGM just 2 weeks ago, that they want any flightpath alterations to be considered in public at LLACC, not behind closed doors. They do not trust the airport, and neither do I. And this is sad."

5.42 Do you think that current arrangements for ensuring sustainable surface access to and from airports, e.g. Airport Transport Forums and airport surface access strategies, are effective? Could more be done to improve surface access and reduce its environmental impacts? If so, what and by whom?

The experience at Luton is that the Airport Transport Forum (ATF) is an artifice the members of which make no contribution to the Airport Surface Access Strategy (ASAS). We understand that the last time a full ASAS was produced at Luton, the ATF was subjected to a consultant's PowerPoint presentation on the draft and made almost no response. Unsurprisingly, the ASAS was devoid of challenging targets. We quote here our overall summary reactions to the consultation draft:

“Airport Surface Access Strategies have the twin objectives of encouraging public transport use and reducing road traffic. According to CAA survey data, a significantly smaller proportion of passengers at Luton travel to and from the Airport by public transport than at any of the other 4 main Airports in the south east. Road traffic generated by passengers and employees contributes significantly to congestion of the local road network and the main link to the M1 motorway. On an average day, staff of companies based on and around the airport site account for 44 per cent of airport-related private car trips.

“Given the constraints of the Airport location, a successful ASAS is, therefore, both important and urgent. The draft ASAS fails both to set out its objectives clearly and to conform to the guidelines published by the Department for Transport (July 1999, paragraph 21) in almost all respects:

- *It works to a 2-year horizon (from 2009) rather than the 5 years recommended.*
- *It makes use of very little available data, particularly progress against all of the targets set in the first ASAS, and, as a result, fails to provide an analysis of existing arrangements.*
- *It sets only short term targets which are not particularly challenging when compared with suitable benchmark airports.*
- *It fails to address the question of whether its targets are realistic or deliverable.*
- *It identifies no new actions while listing future schemes which are unlikely to be implemented within 5 years.*
- *It says nothing about scheme costs and how they might be funded.*

“The draft ASAS is chaotic in structure and riddled with errors and inconsistencies with the result that it is almost impossible to understand what it is trying to say.

“To avoid what would prove to be a wholly negative and dispiriting exercise, we have produced our own draft which we commend to the Airport Transport Forum as a basis for the ASAS. This is attached at Annex A”

Needless to say, the final ASAS was little changed from the consultation draft. We have attached our alternative draft ASAS by way of evidence in the Appendix.

We propose that statutory responsibility for ASASs be placed with neighbouring Local Planning Authorities (LPAs) in consultation with the “host” LPA of the Airport.

5.43 What are your views on the idea of setting a ‘noise envelope’ within which aviation growth would be possible, as technology and operations reduce noise impacts per plane? What do you consider to be the advantages and disadvantages of such an approach?

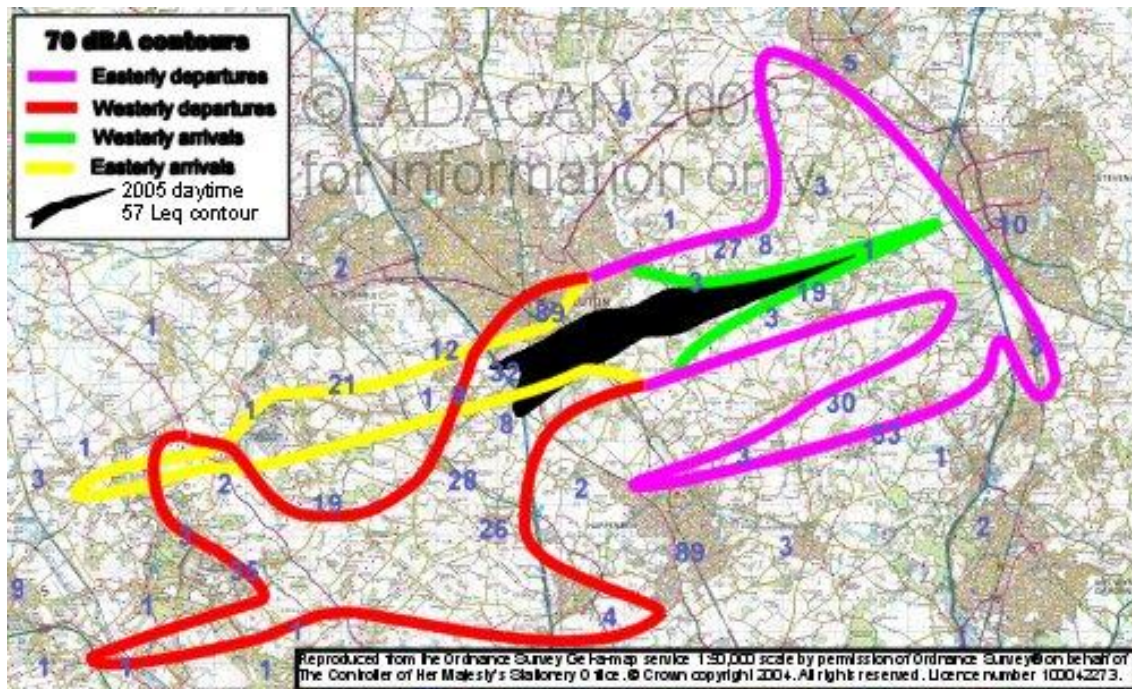
The scoping document does not explain the ‘noise envelope’ concept although the use of the word ‘envelope’ suggests that the intention is that airport growth is to be constrained by some measure of its noise impact. Such concepts have been in operation for some years: the Government set a limit on the area of the 57 L_{eq} dBA daytime noise contour of 127 sq km at Heathrow (Future of Air Transport White Paper) and the planning permission granted for Luton Airport specifies a limit of 31.52 sq km for the same indicator.

The difference between these constraints illustrates the problem with such an approach: the area of such a contour bears no relation to the noise experienced by those living near the airport. They could be more closely related to community disturbance by specifying the number of people within the contour rather than the area but the number would remain arbitrary.

The only satisfactory approach to noise is the application of limits which are mandatory at all airports to be achieved by statutory mitigation and compensation and through operating restrictions. There is now ample guidance, particularly from the World Health Organisation (WHO), based on a growing body of scientific evidence about the health and disturbance effects of noise.

The difficult decision is about the indicators to be used to specify the noise limits. Average noise indicators (L_{eq} , L_{den} , L_{night} , etc.) may be useful for fairly continuous noise sources but where the noise source is erratic or infrequent they are poor indicators. Indeed, they are widely discredited as indicators of disturbance from aviation as they equate doubling of noise energy, the limit of discrimination of human hearing in normal circumstances, with twice the number of noise events, a change which humans can hardly ignore. The Attitudes to Noise from Aviation Sources in England (ANASE) study sponsored by the DfT produced evidence of this weakness.

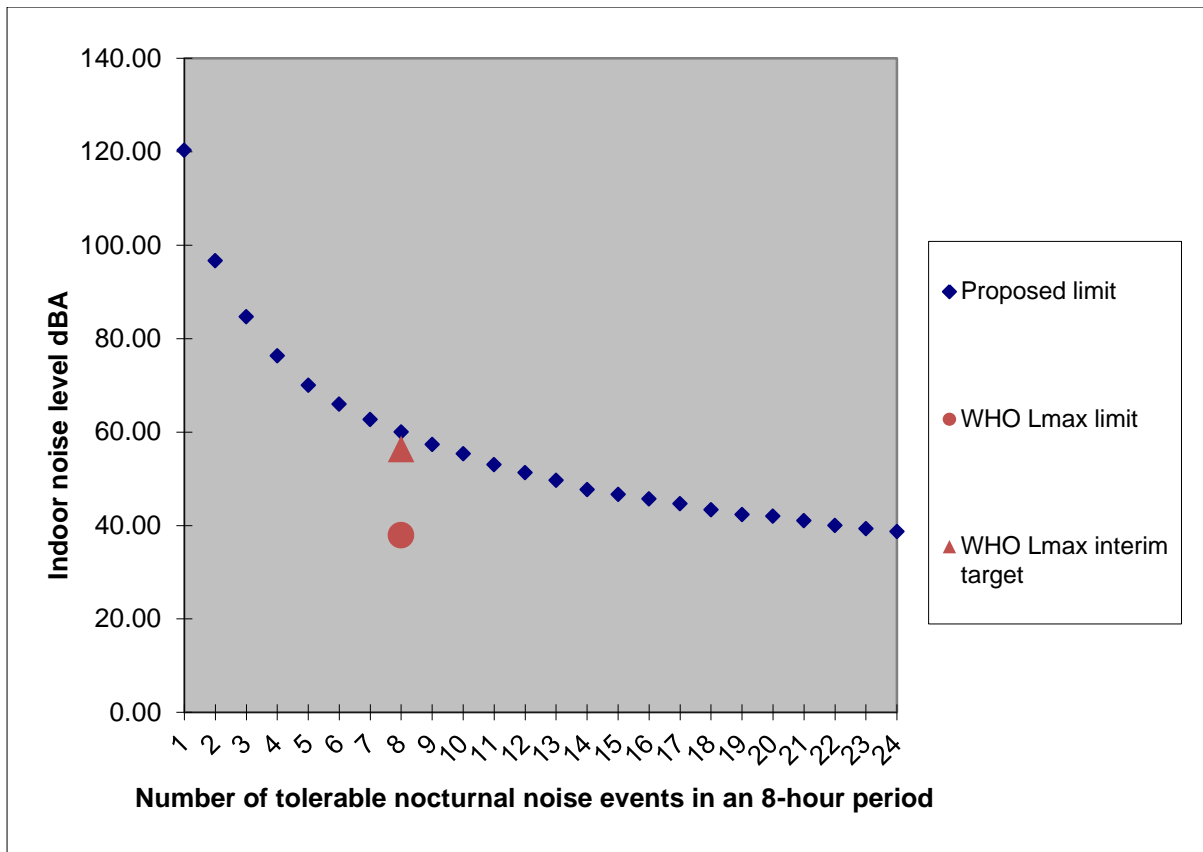
The evidence from Luton, and many other airports (see GACC evidence) is that noise disturbance as indicated by complaints, is far more widespread than L_{eq} contours suggest. Luton Airport’s Annual Monitoring Report (AMR) 2010 day (57dB L_{eq}) and night (48dB L_{eq}) contours exhibit virtually no correlation with the number and location of complaints shown on page 65. It was for this reason that LADACAN undertook a study in 2005 to identify a contour based on the point at which the most frequent aircraft would generate less than 70dBA L_{Amax} , the same noise threshold used at the Airport’s own fixed noise monitoring points. The results shown on the map below clearly correlate better than the L_{eq} contour with the annual complaints figures for 2005 (shown in blue).



Those living outside the contour will never experience noise events louder than 70dB (assuming an unchanged fleet mix) regardless of the number of flights. But disturbance is also caused by the frequency of noisy events, and this will affect all those within the contour. A noise envelope therefore needs to have a limit on the number of movements as well. It has often been quoted that if aircraft made no noise no-one would mind how many flights they made. So there must be targets which limit the number of movements at all locations in all noise bands above, say, 70dBA L_{Amax} .

Having examined a large number of noise indicators, LADACAN has concluded that the search for a single indicator which could provide a useful limit quantifying a noise envelope is doomed to failure. We conclude that universal noise limits must be specified as a trade-off between a maximum noise measure (L_{Amax}) and the number of events in a noise period (eg the 8-hour night) which can be permitted to exceed the specified level.

We have found a proposed limit of this kind for night noise (Griefahn B, Scheuch K, Jansen G, Spreng M. Protection goals for residents in the vicinity of civil airports. Noise and Health 2004;6:51-62) which is shown in the figure below. The graph also shows the equivalent WHO night noise limits (WHO Night Noise Guidelines for Europe 2009) transcribed to maximum indoor levels.



5.44 Is it better to minimise the total number of people affected by aircraft noise (e.g. through noise preferential routes) or to share the burden more evenly (e.g. through wider flight path dispersion) so that a greater number of people are affected by noise less frequently?

This is a difficult issue for LADACAN. We have supporters for both positions. Those currently overflowed would tend to prefer dispersion, as it would appear to share the noise load, but those currently not overflowed obviously don't want it to start. There is also debate over whether already noisy areas like town centres, with large populations, notice the aircraft noise above the ambient town noise, but those in the countryside, with a lower background noise and lower populations, are worse affected by the intrusion of aircraft noise.

In the same way that helicopters can be encouraged to follow motorways, not only because they are easily identifiable but because the motorway is itself already noisy, it could be argued that flightpaths should go over town and city centres as this is where the noise is already. We are not advocating this approach but merely note that we have discussed it.

We know that there is a certain element of self-selection about living under a flightpath. Those that can't stand the noise move away or don't choose to live there (the reason for housing blight) though this is difficult when an airport expands around them. At Luton there are people who have lived under the now busy flightpath since before the airport existed! What is more, those living under the flightpath tend to blot out the noise. Unfortunately this is not the case with sporadic night noise.

On balance we have a slight preference for concentration. There are 3 main reasons.

1. Everyone knows where the aircraft are supposed to go and can make home choices on that basis,
2. If there are specific tracks, airports and the CAA can ensure that aircraft keep to them, rather than all the sky being available. There are already track-keeping issues at Luton, and these would not be aided by dispersion,
3. We have a suspicion that if the whole sky were made available, the airline industry would just expand the number of flights to fill the available space, meaning that everyone was as badly off as the few are now.

Of course the number of movements then becomes an issue under the flightpaths, as the ANASE study identified. There can be no solution to the noise issue without attempts to restrict movement numbers. Modern, larger and more efficient aircraft, can take more passengers with fewer flights but this does not seem to be the airlines' preference, as they want as many direct routes as possible.

5.45 What is the best way to encourage aircraft manufacturers and airlines to continue to strive to achieve further reductions in noise and air pollutant emissions (notably particulate matter and NOx) through the implementation of new technology?

The aviation industry will respond to costs imposed on it. An example is the night noise limits at Heathrow which are reputed to have influenced the design of the A380 aircraft. Until the costs of insulation, compensation and operating restrictions become real costs to the industry in place of the costs to health and well-being borne by the community, progress will be slow.

5.46 What are the economic benefits of night flights? How should the economic benefits be assessed against social and environmental costs?

Given the domination of aviation by leisure travel, we believe that most night flying is driven by the need of airlines to maximise utilisation of capital equipment. We understand that some airports serving major cities close at night so the commercial and economic benefits must be marginal.

5.47 How can the night flying regime be improved to deliver better outcomes for residents living close to airports and other stakeholders, including businesses that use night flights?

The health impacts of aircraft noise at night are so serious (see evidence submitted by AirportWatch) that, in advance of settling the issue of effective metrics (see our answer to question 5.43), the Government must make plans to impose, over time, the noise limits recommended by the WHO, an interim target (IT) of 55 dB_{Lnight,outside} followed by a health-based limit of 40_{Lnight,outside}. These limits have to be supported by statutory requirements to achieve them (or their indoor equivalents as we are dealing with night noise) through noise insulation schemes, monetary compensation for displaced households and constraints on night operations. At Luton, up to 1,000 dwellings (AMR 2010) are subject to noise in excess of the interim target so it should be possible to achieve this level by 2015 without undue cost to the industry. The health-based limit, 40_{Lnight,outside}, is probably exceeded for tens of thousands of dwellings because Luton Airport is ringed by seven large towns which are under flight paths so imposition of this limit may have to be deferred to 2030. It is, though, important to announce this target as it will inform the work now being conducted by NATS to redesign the airspace in the south of England. We accept that a number of factors such as modal split can influence the detail of noise contours from year to year and that airports and airlines need

to be able to plan their responses to tightening noise limits so we propose that progress from 55 dB_{Lnight,outside} in 2015 to 40_{Lnight,outside} in 2030 be achieved in 5 dB steps every 5 years.

We do not accept that users of night flights should transfer the costs of doing so onto the community as they do now.

5.48 Should extended periods of respite from night noise be considered, even if this resulted in increased frequency of flights before or after those respite periods?

The evidence amassed by the WHO demonstrated that constraints on flying imposed for an 8-hour night period would only protect the full expectation of uninterrupted sleep for half of the population. We, therefore, regard respite periods as ineffective and refer to our discussion of night noise limits in our answer to question 5.43.

Any other comments

5.49 If you have comments on any strategic issues not covered in this scoping document, which you consider to be relevant to the development of the aviation policy framework, please include them in your response.

Third Party Risk

LADACAN is very concerned that Local Planning Authorities (LPAs) do not appear to take the risk to communities close to the ends of airport runways seriously. LADACAN has always had safety precautions as the second of its three objectives. It is particularly concerned that Luton Borough Council (LBC) has a poor record in respect of third party risk arising from airport operations. We cite these examples:

1. Luton BC East Luton Corridor Improvement Scheme

Report to Development Control Committee 6th October 2004:

“Public Safety Zones

69. *The junction of Airport Way, Lower Harpenden Road and Gipsy Lane falls within the Public Safety Zone. DfT Circular 1/2002 does not permit proposals within Public Safety Zones which would increase the number of people living, working or congregating within the zone. In the case of transport infrastructure, the DfT note that careful consideration should be given to the location of major road junctions, traffic lights and roundabouts, which may lead to a number of stationary vehicles within the zone.*

70. *Following discussions between the Major Transportation Projects Team and the DfT and the submission of further information relating to traffic flows within the Public Safety Zone, no objections have been raised by the DfT to the proposal.”*

No reference was made to the other direction in paragraph 18 of the DfT Circular: *“Proposals for major roads and motorways should be carefully assessed in terms of the average density of people that might be expected to be exposed to risk.”*

After an objector had addressed the meeting, the planning officer advised the Committee that as each vehicle occupant would spend a very short time in the Public Safety Zone (PSZ), each would be exposed to a very low level of individual risk. This advice is the exact opposite of the advice in paragraph 18 of the Circular.

When DfT was challenged by the objector after the above meeting, the response was: *"The Department is satisfied that Luton Borough Council took into account Public Safety Zone policy in considering the planning application for the above scheme, and we consequently offered a 'no objection response on PSZ policy grounds' to the planning application"* - Paul Cox email to Roger Wood of LADACAN, dated 6th October 2004.

2. Stirling Place, Kimpton Road, Luton (Application No. 08/00845/FUL): mixed use development including 400 residential units

(LADACAN objected to this planning application on grounds which included the site's proximity to the PSZ when national policy supported expansion of the Airport to accommodate a 3-fold increase in air traffic. LADACAN also objected on the grounds that the site was well within the 1 in 1 million annual individual risk contour published by the DfT for the SERAS study and that, as the proposed density of occupation exceeded that assumed in the cost/benefit analysis which formed the basis of the PSZ policy by a factor of ten, planning permission should be refused unless a more detailed risk analysis was undertaken and indicated that the risk to residents could be reduced to acceptable levels.

These objections were neither reported nor commented upon in writing to the Development Control Committee at its meeting on 20th May when it granted permission and it was left to the LADACAN representative to try to explain the objections in a 5-minute 'right to speak' presentation. When asked by the Committee Chairman to respond to the objection, the only advice offered to the Committee by the Development Control Manager was *"the site is not in the Public Safety Zone"*, a fact which had been stated by LADACAN in the first sentence of its objection.

3. Redevelopment of a school site in the PSZ

At its meeting on 12th September 2011, the Executive of LBC approved a proposal to refurbish a redundant school building in the PSZ for, among other uses, a 630-place primary school costing £3million. At the same meeting, it approved a proposal to engage specialist advisors to prepare plans and proposals for development of the Airport to enable a three-fold increase in air traffic.

LADACAN is aware of similarly negligent planning decisions at other airports and believes that LPAs must take risk much more seriously. The examples we cite are evidence that:

- a. planners and Councillors are unable to apply the PSZ guidance in the DfT Circular 1/2010, particularly to transport infrastructure, and do not understand its basis;
- b. planners must be made to understand that enhanced risk is not confined to PSZs; and
- c. LPAs must be reminded of their responsibility to implement the Government's *"basic policy objective governing the restriction on development near civil airports . . .*

that there should be no increase in the number of people living, working or congregating in Public Safety Zones and that, over time, the number should be reduced as circumstances allow.”

The “localism” concept and its possible future role in democratising the airport-related planning process at airports such as Luton

We confess that, at the time of writing (October 2011) we remain confused about the Government’s proposals for changing the planning system which we read is intended to strengthen local democratic control but, at the same time, establish a presumption in favour of development. In particular, we understand that the valuable guidance in Planning Policy Statements (PPS) and Planning Policy Guidance (PPG) is to be removed. We are particularly concerned that PPG24 should be retained in some form although, in line with our earlier answers, with more effective noise indicators and limits.

The Government should note that the only protection from the adverse impacts of airport operations available to local communities, except those at the 3 designated airports, is in the hands of the Local Planning Authority (LPA) within whose boundaries the airport happens to sit. Further, this control can only be exerted when an application for planning permission or certificate of permitted development is made for work at the airport, a relatively rare event.

The planning consent under which Luton Airport operates was granted in 1997. In granting permission, Luton Borough Council (LBC) ignored representations from neighbouring authorities whose boundaries run to the airport fence and imposed noise limits which, following the then-expected ban on Chapter 2 aircraft in the EU, are unlikely to ever come close to being exceeded. It also accepted that the resulting Airport would have a capacity of 5 mppa – it actually exceeded 10 mppa in 2008.

LBC later issued a certificate of permitted development for a taxiway which allowed the Airport to implement a one-way flow of aircraft, thus reducing congestion and raising the hourly movement rate which could be sustained. This obviously broke the rule that developments with environmental impacts require planning permission but the planning officers accepted the Airport’s assurance that capacity would not be raised.

Our experience is that planning officers do not have the expertise to address the complexities of airport development and need to engage consultants to advise them, something few local authorities are willing to fund. We also believe that permitted development rights must be withdrawn from airport operators to avoid “salami-slicing” expansion by stealth.

Appendix

LADACAN proposed draft Airport Surface Access Strategy 2009-2014

1. Policy

The Government published its Transport White Paper in 1998. This established Local Transport Plans (LTPs) as the mechanism for local authorities to bid for allocation of capital for transport schemes.

To inform LTPs, the White Paper required all airports in England with scheduled passenger services to establish and lead an Airport Transport Forum (ATF) to bring together airport operators, local authorities, Passenger Transport Authorities (PTAs), transport operators, local people and businesses, and other interested parties. The ATFs are expected¹ “to improve public transport access to airports, and reduce reliance on private, road-based transport, congestion, and pollution on nearby roads.”

The ATF is required to prepare Airport Surface Access Strategies (ASAS) which should set out:

- ☐ challenging short and long term targets for increasing the proportion of journeys made to the airport by public transport;
- ☐ the strategy, including green transport plans for those who work at the airport, to achieve these targets, taking into account prospective growth at the airport and background growth in traffic; and
- ☐ a system whereby the Forum can oversee implementation of the strategy.

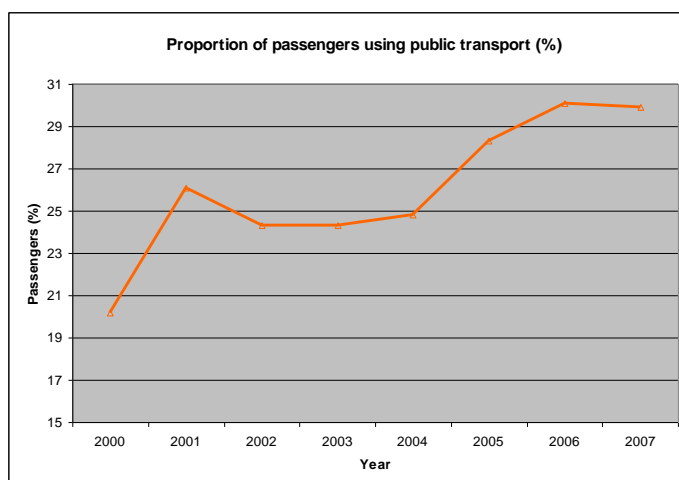
Targets should normally reflect a five year time horizon in line with the timetable for LTPs and should be reviewed every 5 years.

The first ASAS for Luton Airport was published in July 2000 and the “ASAS 2008-2011” will be the first revision.

2. Trends in public transport use since 2000

2.1. Passengers

According to the CAA annual surveys of passengers, the proportion of passengers travelling to the Airport by public transport has changed over the period 2000 to 2007 as in the figure. The proportion using public transport has increased from 20 per cent to 30 per cent.

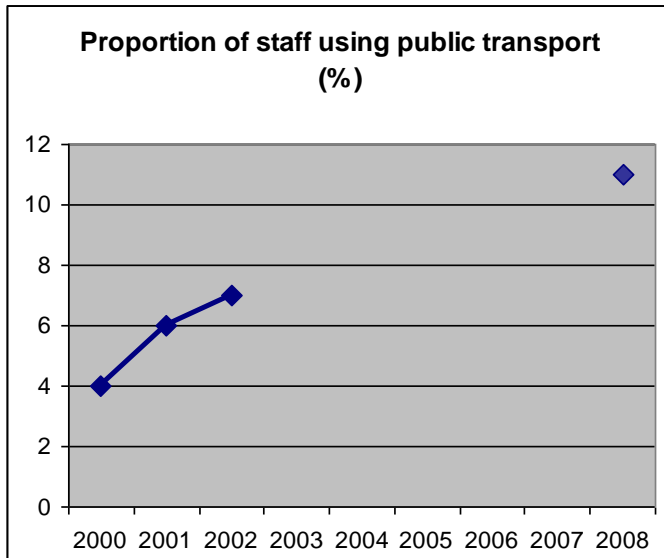


¹ Guidance on Air Transport Forums and Airport Surface Access Strategies, Department for Transport, July 1999

We note that the draft ASAS 2008-2011 claims that the proportion in 2007 was 33 per cent. The draft Consultative Committee (LLACC) minutes of 12 January 2009 state that this figure is “unweighted”. We can find no confirmation of this figure in the CAA data accessible to the public and have used the published data from CAA for constituency between years and between airports.

2.2. Staff

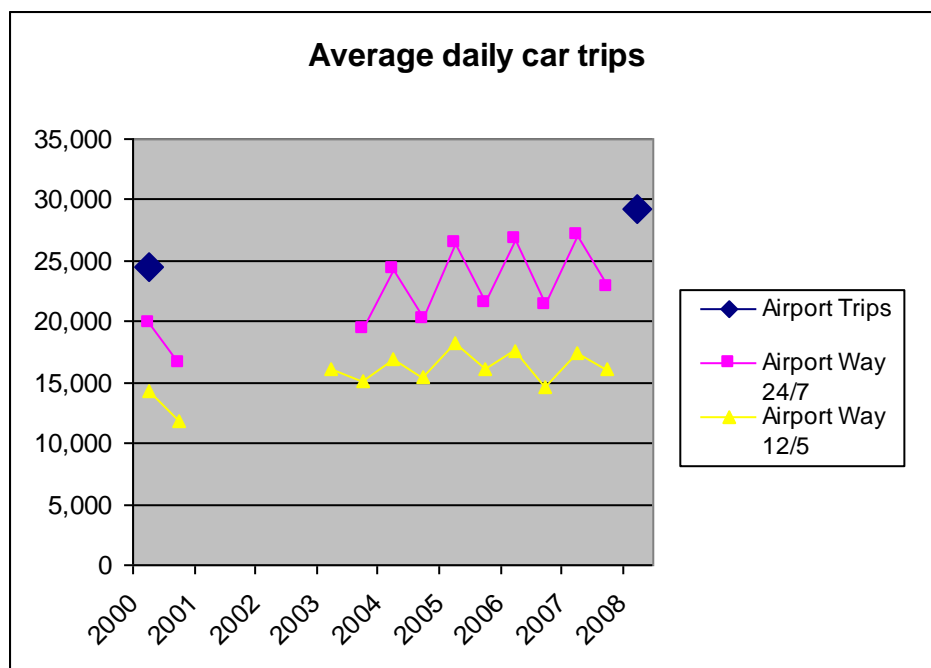
Data from the draft ASAS 2008-2011 and the interim London Luton Airport Operations Limited (LLAOL) updates in 2001, 2002 and 2003 show a steady rise in the proportion of staff travelling to work by public transport from 4 per cent in 2000 to 11 per cent in 2008.



3. Trend in private car journeys since 2000

The secondary objective of all ASAS’s is to reduce private car trips. This is particularly important for Luton as the local road network is heavily congested and will remain so in peak hours even when the East Luton Corridor (ELC) works currently in hand are completed. Further, the Highways Agency is expressing concern over the capacity of junctions 10 and 10a of the M1 in response to planning applications for redevelopment of land in south Luton. Based on figures produced in the planning of the ELC works, we estimate that up to half of the traffic using these links is Airport-related.

To assess the trend in airport-related private car trips, we applied the proportions of such trips given in the draft ASAS 2008-2011 for passengers in 2002 and 2007 and for staff in 2000 and 2008 to the passenger traffic and employment figures given in the AMRs for 2000, to the figure for air passenger traffic in 2008 given at the LLACC meeting on 12 January 2009 (10.3 mppa) and the figure for employment at the Airport in 2008 (8,500) used in the draft ASAS 2008-2011. Applying the passenger group size data from the CAA surveys gave estimates of the numbers of private car trips generated by the Airport in 2000 and 2008. The figure shows these results plotted with the traffic flows on Airport Way reported in the AMRs for the period 2000 to 2007.’



The numbers of trips on Airport Way show the summer-winter seasonal variation in traffic and are averaged over 24 hours and 7 days per week ("24/7") and 12 hours Monday to Friday ("12/5"). The trip generation estimates for 2000 and 2008 are shown in the table below.

Daily car trips to/from Airport				
Passengers	Proportion of total (%) 2002	Proportion of total (%) 2007	Average daily trips 2000	Average daily trips 2008
Car (drop-off)	31	24	8,130	11,851
Car (on-site parking)	23	18	3,016	4,444
		Average daily passenger trips	11,146	16,296
Staff	Proportion of total (%) 2000	Proportion of total (%) 2008		
Drive alone	78	72	12,753	12,240
Drive with passengers	4	4	654	680
		Average daily staff trips	13,407	12,920
		Total average daily trips	24,553	29,216

These estimates show that the number of private car trips made by air passengers to and from the Airport increased by just over 46 per cent between 2000 and 2008. The main cause was the overall increase in passenger numbers combined with a decline in the average size of groups travelling together from 1.3 to 1.1 people. There has been little growth in employment but, while the proportion of car trips by staff has fallen from 55 to 44 per cent, these trips retain significant potential for improvement, particularly as they can be assumed to make a significant contribution to peak traffic volumes.

4. Achievements against targets

The targets set in the first ASAS (2000) are reported in the LLAOL ASAS update 2001 as:

- ☐ to increase the proportion of air passengers travelling to and from the airport by public transport from 23% to 30%
- ☐ to control the amount of on-site air passenger parking spaces so as to support the above target
- ☐ to increase the proportion of employees travelling to and from the airport by foot or by bicycle from 4% to 5%
- ☐ to increase the proportion of employees travelling to and from the airport by public transport from 4% to 6%
- ☐ to undertake a comprehensive review of LLAOL-managed communal employee parking in light of forecast growth in employment by end 2001
- ☐ to implement a Travel Plan covering LLAOL staff by the end of 2000 and to encourage other employers to develop Travel Plans so that one in three on-site by end 2001 employees are covered by a company Travel Plan

In the LLAOL ASAS update 2003, the first of these was replaced by

- ☐ To increase the proportion of passengers travelling to and from the airport by public transport to 35 % or above

and a further target was added:

- ☐ To reduce the proportion of employees travelling to and from the airport by car alone to 60 % or less

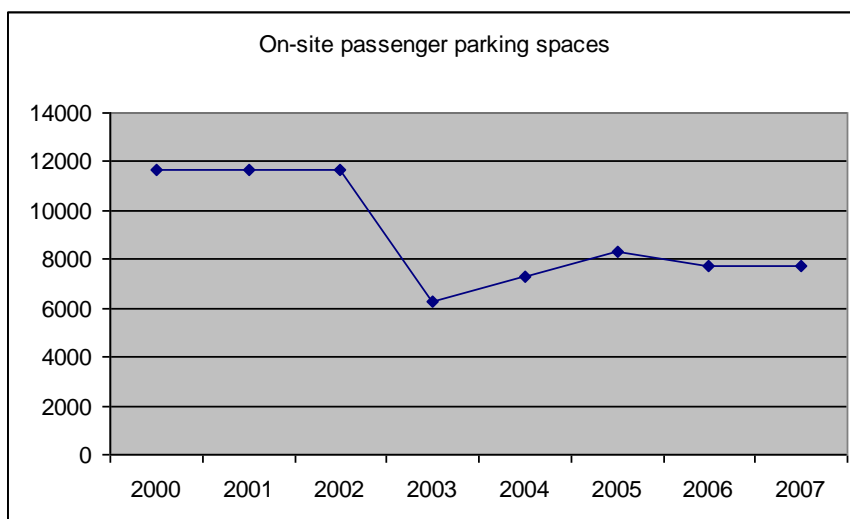
Progress in achieving these targets is reviewed in the following sections.

- 4.1. to increase the proportion of air passengers travelling to and from the airport by public transport from 23% to 30%

The CAA survey data shows that this target was finally achieved in 2006. However, there was a slight fall in passenger public transport use in 2007 to 29.9 per cent.

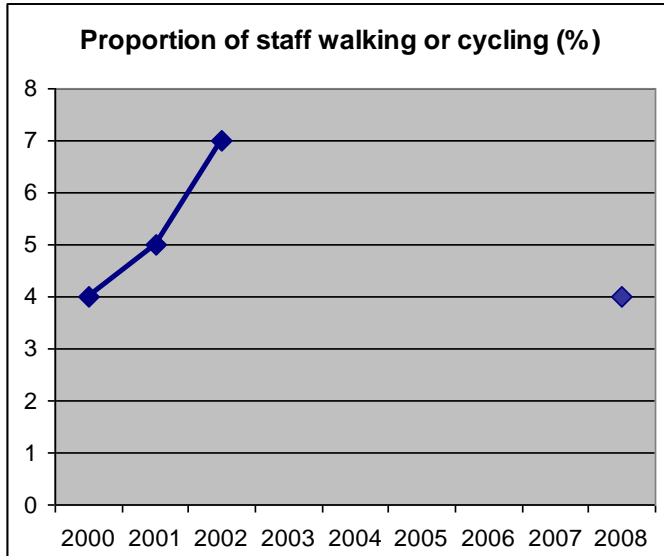
- 4.2. to control the amount of on-site air passenger parking spaces so as to support the above target

The Airport Annual Monitoring Reports (AMRs) 2000-2007 show that the number of on-site spaces declined from 11,655 in 2000 to 7,695 in 2007. The major change was the abandonment in 2003 of the valet parking which provided over half of the spaces until September 2003. The figure illustrates the trend since then.



4.3. to increase the proportion of employees travelling to and from the airport by foot or by bicycle from 4% to 5%

Data from the draft ASAS 2008-2011 and the LLAOL updates in 2001, 2002 and 2003 show that, after an initial significant improvement, no overall progress was made against this target between 2000 and 2008 (see figure).

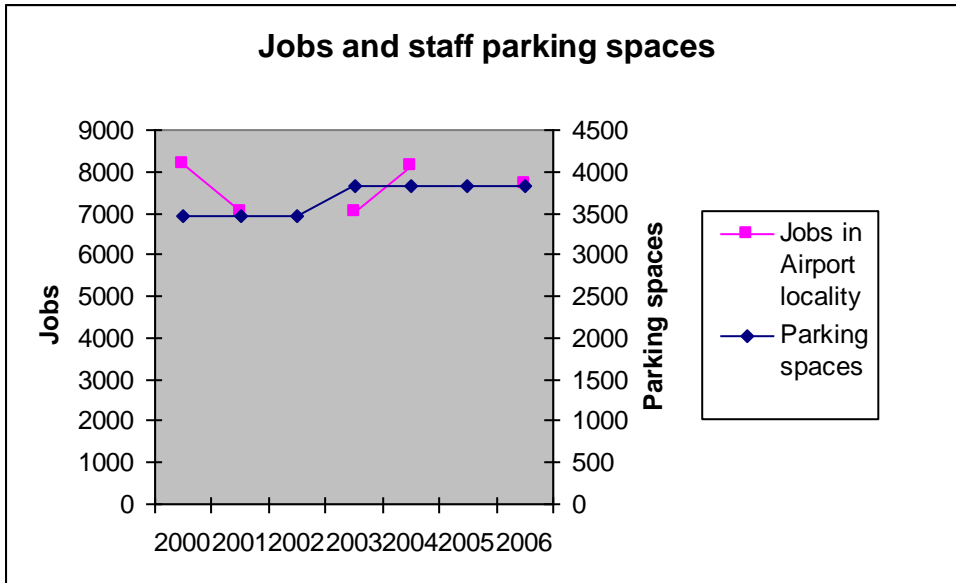


4.4. to increase the proportion of employees travelling to and from the airport by public transport from 4% to 6%

The data in section 2.2 above shows that this target was achieved in 2001 and that further improvement to 11 per cent was reached in 2008.

4.5. to undertake a comprehensive review of LLAOL-managed communal employee parking in light of forecast growth in employment by end 2001

It was claimed in 2002 (LLAOL ASAS update 2002) that this had been completed but no details are available. However, data on the number of jobs and staff parking spaces in the AMRs (see figure) suggests that the review showed that 1 space per 2 jobs was an appropriate ratio and that this was achieved in 2001. The increase in 2003 appears to have been inadequate to allow for the job growth in 2004 but the decline in employment since then had brought the ratio back to 1 per 2 by 2006.



Note that figures for 2007 have been excluded as the Luton Borough Council (LBC) employment survey area was extended to include Century Place which is a modern office building which is assumed to have its own parking provision to local planning authority standards.

4.6. to implement a Travel Plan covering LLAOL staff by the end of 2000 and to encourage other employers to develop Travel Plans so that one in three on-site by end 2001 employees are covered by a company Travel Plan

It was claimed in 2002 (LLAOL ASAS update 2002) that this had been completed but no details are available.

4.7. To increase the proportion of passengers travelling to and from the airport by public transport to 35 % or above

The CAA survey data (see section 2.1) shows that progress toward this target has stalled with a slight fall in passenger public transport use in 2007 to 29.9 per cent.

4.8. To reduce the proportion of employees travelling to and from the airport by car alone to 60 % or less

Data in the draft ASAS 2008-2011 shows that the proportion of staff driving to and from work alone had dropped from 78 per cent in 2000 to 72 per cent in 2008. The number car sharing has also dropped by 1 per cent.

5. Success of the Strategy

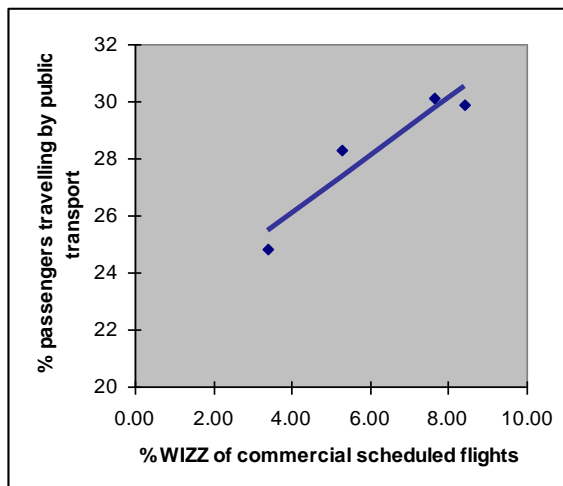
The objective of the ASAS is “increasing the proportion of journeys to airports by public transport” and targets should be aimed at “decreasing the proportion of journeys to the airport made by private car”². As shown in section 2, there has been progress against the objective in respect of both passenger and staff journeys.

In this section, we consider which changes have contributed to this success.

5.1. Passenger journeys by public transport

² Guidance on Air Transport Forums and Airport Surface Access Strategies, Department for Transport, July 1999

As shown in section 3, although the original (2000) target was reached in 2006, progress appears to have stalled and the more demanding 35 per cent target adopted in 2003 has not been reached. As the figure in section 2.1 shows, much of the gain has occurred since 2004, the year of significant expansion of the European Union. The draft ASAS 2008-2011 (paragraph 4.10) points out that foreign passengers are significantly more likely to use public transport than UK passengers, probably for the obvious reason that they are unlikely to have access to private cars in the UK. Luton has experienced significant traffic from the new EU countries in eastern Europe and the figure below shows the relationship between public transport use and the proportion of commercial flights by the Polish operator WIZZ.

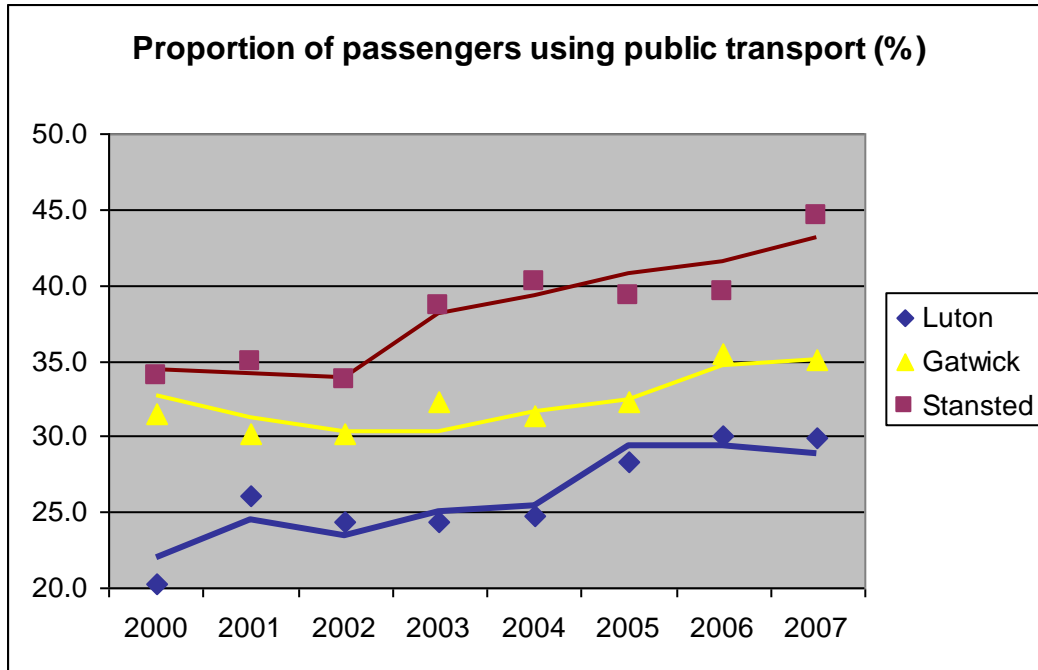


Data from CAA surveys and AMRs

The regression line shown accounts for 85 per cent of the variation in the data.

Journey purpose can also influence surface travel choice and there has been a significant decline in business travel as a proportion of the whole since 2000. Similar changes have occurred at other airports. Another possible influence on the proportion of passengers using public transport could be the total passenger traffic as larger airports are likely to have more public transport routes and higher service frequencies.

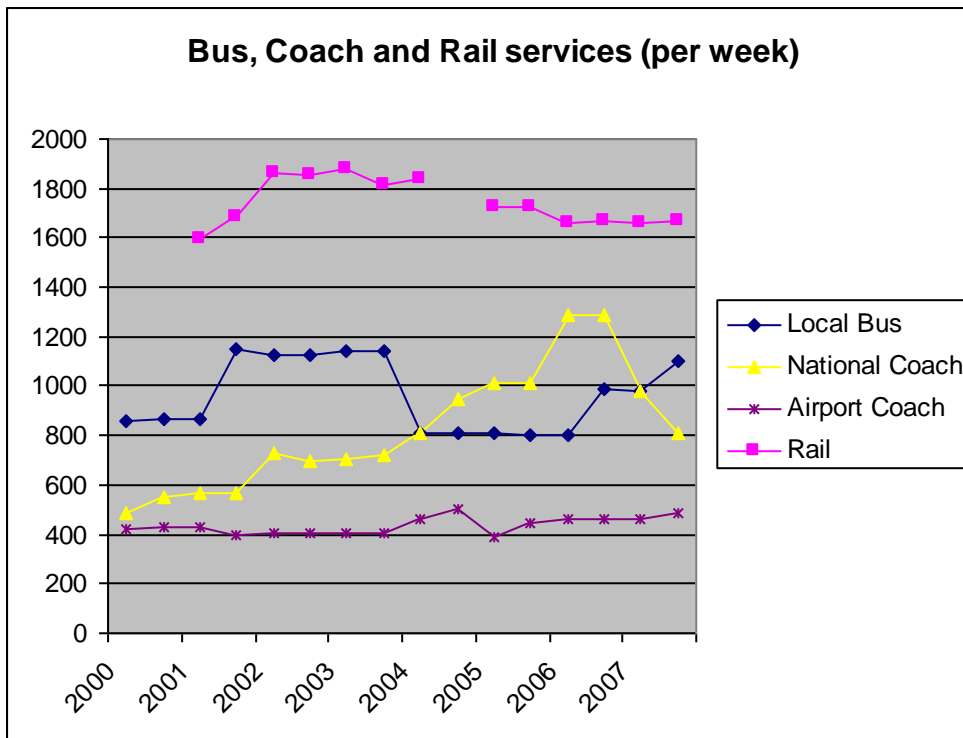
We have attempted to identify the effects of all of these variables by multi-variate regression modelling. We used CAA survey data giving proportions of UK business, UK leisure, foreign business and foreign leisure passengers together with annual passengers (mppa) for the period 2000 to 2007 at Luton, Gatwick and Stansted. We added the total passenger throughput (mppa) and dummy variables for Gatwick and Stansted to capture any systematic differences between them and Luton in respect of public transport use. The results of the modelling, which accounts for over 95 per cent of the variation in the data, are plotted in the figure below.



The model uses the proportion of UK business passengers as its base as the four passenger variables always have to add to 100 per cent. It shows that public transport use is most sensitive to both categories of foreign passenger, increasing by about 0.5 per cent for each 1 per cent increase in passengers at the expense of UK business passengers. It is less sensitive to the proportion of UK passengers, showing a reduction of just over 0.2 per cent per 1 per cent increase in UK leisure passengers at the expense of UK business passengers.

It is clear from this that the main cause of the increased public transport use at Luton has been the growth in the proportion of foreign travellers partly offset by the decline in the proportion of UK business passengers, accounting together for 7 per cent of the 10 per cent rise between 2000 and 2007.

Of the remaining 3 per cent, 1 per cent arose from the growth in Airport passengers while the remainder can be attributed to the efforts made to promote public transport and to restrict private car use. Figures from the AMRs (see figure below) indicate that national coach service frequencies, mainly to central London, increased steadily over the period but there was no significant gain in other modes. The large fall in 2007 may account for the halt to growth in public transport use in that year.



The Onward Travel Centre (OTC), which opened in the main arrivals hall in 2005, may have contributed to improvement in the use of public transport. The ASAS update 2003 states that “Rail/coach tickets are now sold on board the majority of flights entering the airport” but this is not mentioned in the draft ASAS 2008-2011 so it may be that the OTC replaced this arrangement.

The reduction in on-site car parking in 2003 (see section 3.2 above), when the valet parking scheme was closed, may have encouraged public transport use if the pricing policy was used effectively. We are unable to draw any conclusions on this as no data on car park occupancy or pricing is available.

5.2. Staff Journeys by public transport

The rise in the proportion of staff travelling to work by public transport (section 2.2 above) increased from 4 per cent in 2000 to 11 per cent in 2008. The only explanation for this offered in the draft ASAS 2008-2011 is the Staff Travelcard Scheme and its predecessor Travelpass scheme which offer travel at up to 50 per cent discount. Without more detail, it is impossible to assess whether other measures such as constraints on employee car parking and components of in employers’ travel plans have contributed.

It is disappointing that the initial gain in the proportion of staff walking or cycling to work has been reversed (see section 3.3 above). However, we note the comment in the ASAS update 2003 that the employee survey from which this data is derived is not carried out consistently at the same time of year so seasonal variation may invalidate the data.

6. Planning context

6.1. Airport growth and road network capacity

The White Paper “The Future of Air Transport”, supported by the East of England Plan, suggests that Luton Airport could expand to 30 million passengers per annum (mppa) by 2030. However, the most recent forecast from the Department for Transport (DfT, January 2009) indicates that, with current development expectations, passenger traffic is not likely to exceed 15 mppa.

At this level, there is unlikely to be any significant increase in employment. However, based on the 2007 surface access modal split, the passenger growth would generate 7,500 extra private car trips on the average day, an increase of 25 per cent. This would place considerable strain on the local road network which, even following the improvements to the M1 and the East Luton Corridor (ELC) just being completed, has little spare capacity. The enhanced ELC will have inadequate peak hour capacity on the day it opens fully and has been designed to accommodate road traffic for a 12 mppa Airport. In addition, the Highways Agency is already expressing reservations about the capacity of junctions 10a and 10 of the M1 in respect of the extra traffic expected to be generated by developments in south Luton at Napier Park, Stirling Place and the Vauxhall Trailer Park.

Additionally, the continuing problems with traffic circulation in the Central Terminal Area (CTA) point to a growing problem with increased passenger traffic. In the longer term, proposals for 5,500 homes in the countryside east of Luton with a bypass running through the Airport site will not only generate more road traffic but also bring through traffic from outside the area on to the ELC.

It is, therefore, urgent that more passengers and staff be persuaded to use public transport to get to the Airport. The current economic downturn may provide some breathing space in which a radical surface access strategy can be planned and, in part, implemented.

6.2. Recent changes

As shown in the figure in section 5.1 above, the number of rail services at Luton Airport Parkway Station has declined in recent years by 11 per cent from its peak in 2002. In addition, the number of coach services to central London declined by 47 per cent between 2006 and 2007. More recently, in January 2009, Arriva route 69 and 70 bus services, which served Milton Keynes, Leyton Buzzard and Dunstable and provided around 40 per cent of local bus services to the Airport, were cut back to Luton Town Centre.

These losses, together with the 2008 decision to charge for the Station to Airport bus transfer, are likely to depress the proportion of passengers using public transport although, in the medium term, the introduction of longer trains and more direct services on the Thameslink route are likely to have a positive effect.

The completion of the dedicated road approach to the Airport as part of the ELC project, will make private car travel more attractive although the impact of this may be limited if the problems in the CTA cannot be resolved. The recent decision to add 980 spaces to the long term car park, which is not proposed or justified in the draft ASAS 2008-2011, will also encourage more private car travel.

The draft ASAS 2008-2011 states that the Airport operator has launched an employee car share scheme which is open to all staff on the Airport site. This operates through an online national car sharing network with 300,000 registered users but no information is given about expected take-up in similar commercial environments so it is impossible to predict the reduction in car journeys which this is likely to deliver.

6.3. Benchmarks

The modelling of the differences between UK and foreign passengers and the influence of journey purpose on public transport use undertaken in section 5.1 above indicated that Gatwick Airport has an advantage over Luton of 1.7 per cent of air passengers and Stansted one of 3.8 per cent. The most obvious potential cause of this difference is that both airports have railway stations with direct pedestrian connections to the terminals. Additionally, Stansted has an extensive bus and coach station with passenger waiting rooms. Gatwick has more intercontinental flights than Stansted or Luton and foreign passengers there may have longer stays in the UK and be likely to make different surface travel choices such as using car rental more often.

The CAA passenger survey data shows that, in 2007, 35.1 per cent of Gatwick passengers used public transport and 44.6 per cent of Stansted passengers.

7. Proposed Targets

If these other airports had the surface access modal split which Luton had in 2007, Gatwick would have achieved over 31 per cent public transport use and Stansted more than 33 per cent. Both have exhibited growth of 3 to 6 per cent over the four years to 2007 so, projecting this forward, it is reasonable to expect the proportion of passengers using public transport at Luton, based on weighted CAA data, to reach 35 per cent by 2011 without any initiative to stimulate growth. We, therefore, conclude that a challenging target for 2011 is 36 per cent.

☐ Target 1: To increase the proportion of air passengers travelling to and from London Luton Airport by public transport to 36% or above by 2011.

The time horizon mandated by the DfT guidance for ASAS's is five years. In the further 3 years to 2014, we would expect that a further underlying gain of 3 per cent should be made and suggest a further 1 per cent could be achieved. Even this target would not be sufficient to prevent the number of private car trips growing if passenger numbers increase at the rate projected in section 6.1 above.

☐ Target 2: To increase the proportion of air passengers travelling to and from London Luton Airport by public transport to 40% or above by 2014.

There are no obvious benchmarks for employee travel modal split so the primary aim must be to find a way to establish challenging targets for public transport and shared car journeys which are achievable. Walking and cycling may also provide room for improvement but there are some concerns about the reliability of the data derived from the staff surveys (see section 5.2 above).

☐ Target 3: To commission a study to identify suitable benchmarks for staff travel to work.

☐ Target 4: To put in place reliable mechanisms for collecting staff travel data annually.

☐ Target 5: To use the results of targets 3 and 4 to set challenging but achievable targets for the proportion of staff travelling by public transport, car sharing, walking and cycling.

8. Action Plan

8.1. Passenger travel

Our modelling results suggest that continuing the trend of recent years which has seen significant growth in the proportion of foreign passengers will deliver increases in public transport use. This may be sensitive to the relationship between the pound and the euro which has become very favourable in recent months. Marketing activities which concentrate on attracting passengers from abroad are likely to be most productive.

Growth in total air traffic will also deliver around 0.15 per cent rise per annum in public transport use if the recent trend is sustained although this will have minimal impact on the growth in private car trips.

To really make a difference, we suggest that through-ticketing offering discounted public transport fares may be necessary, perhaps coupled with "baggage in advance" services. As far as we are aware, none of the airlines operating at Luton offers public transport tickets through its web site.

Other measures which might be considered are increasing parking charges and charging for entry to the drop-off zone. The latter might help with the apparent limitations of the traffic circulation in the Central Terminal

Area (CTA) particularly if, for example, it were to be relocated to be adjacent to the planned north entrance to Parkway Station.

We believe that the decline in services in recent years will make the task of increasing public transport use more difficult and a clear strategy for working with transport partners must be established to reverse this. A particular opportunity occurs in relation to Milton Keynes which is identified in the draft ASAS 2008-2011 as one of the three most common districts of origin for passengers and which only has an hourly direct coach service to the Airport.

In the longer term, it is unlikely that a direct rail link can be provided to the existing terminals and the decision to surrender the route for a tracked connection between Parkway Station and the terminal in favour of the new road will seriously inhibit the Airport's efforts to benefit from the planned improvements to the Thameslink service.

Overall, it appears that little is known about the underlying reasons for modal choice when travelling to airports. There would be considerable value in reviewing any existing research in this area and, if it proves inadequate, commissioning new work.

8.2. Staff Travel

In the absence of any benchmarks or projections of expectations from the initiatives already in place, it is difficult to propose a strategy for improvement. However, as we showed in section 3, staff trips accounted for 44 per cent of the total private car journeys to or from the Airport in 2007. Although this proportion will decline over time, the number of staff trips will remain significant, particularly as a high proportion occur during peak times.

The Travelcard scheme appears to have proved successful and efforts must be made to increase take-up. In particular, the fact that 58 per cent of staff live in Luton (draft ASAS 2008-2011) indicates significant potential for greater use of public transport. Dedicated transport services could be instituted at popular times.

The apparent declines in walking and cycling to work, if confirmed by reliable research, need to be reversed and more work is needed to encourage them. Again, the high proportion of staff living in Luton should prove helpful.

The potential for charging staff for car parking should be investigated although care will be required to ensure that parking is not displaced to surrounding residential streets. Priority parking spaces for car shares could encourage take-up of the car share scheme.

9. Monitoring and Reporting

It is clear that there are several areas in which data collection needs to be enhanced and made more consistent from year to year. The content of the AMR will be reviewed to ensure that it contributes to the monitoring of progress in meeting the ASAS targets. In particular, the locations where road traffic is reported will need to be changed to reflect the significant changes on the East Luton Corridor.

☐ Target 6: Progress toward ASAS targets will be reported in the Annual Monitoring Report along with relevant data on road and public transport availability and use.

Appendix A – Membership of the Air Transport Forum