



Anthony Aldridge
Programme Director
Luton Rising

Via Email only

1 April 2022

Dear Mr Aldridge,

I am writing on behalf of the Mayor of London in response to Luton Airport's consultation on proposals for its expansion. I welcome the opportunity to raise our key concerns.

We are facing a climate emergency. National legislation has set a target of net zero emissions by 2050 and the scientific evidence is clear that we must halve our emissions by 2030 to keep us on track and limit global temperature rise to 1.5°C. This is why the Mayor has declared that London must achieve net zero emissions by 2030. The aviation sector needs to play its part and not undermine our collective efforts to rapidly decarbonise.

The Committee on Climate Change (CCC) has been clear in its Sixth Carbon Budget report that "there should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory to be able to accommodate the additional demand." Despite there being no evidence of this to date, the Government's consultation on 'Jet Zero' held during summer 2021 failed to adequately address how UK aviation would support achievement of net zero carbon and explicitly avoided answering whether and how capacity growth could be accommodated. I agree with the CCC's 2021 progress report to Parliament¹ which clearly stated that "some moderation of demand growth is likely to be required to meet the legislated emissions targets, as pre pandemic trends in demand growth exceed what we expect can be accommodated in a Net Zero world". In this context, we cannot see how any airport expansion can be justified and we therefore oppose Luton Airport's proposals, as we consider them to be incompatible with the UK's net zero target.

Delivering sustainable mode shift in airport surface access is also an essential part of decarbonisation as well as in reducing air pollution. The lack of ambition shown by Luton Airport in this regard is deeply disappointing, with a public

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¹ <https://www.theccc.org.uk/wp-content/uploads/2021/06/Progress-in-reducing-emissions-2021-Report-to-Parliament.pdf>

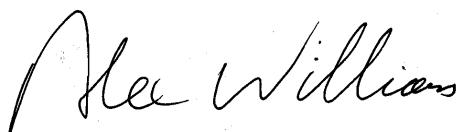
transport mode share target of just 45% by 2039 – a tiny increase compared to the 43.5% mode share in 2019, according to Civil Aviation Authority (CAA) data. I am especially surprised that you have assumed a mode share target in 2027 of 40%, effectively below pre-pandemic levels. This is all despite the transformational rail improvements in the coming months, including opening of the DART light rail link from the airport to the nearby railway station and the onward connectivity to be offered by the new Elizabeth line, via interchange at Farringdon. The forecast 39 per cent increase in vehicle trips is completely incompatible with sustainable mode shift, as is your proposal to increase passenger car parking by 62 per cent. Your 'Green Controlled Growth' targets for surface access-related carbon and air quality appear to take such growth in vehicle trips as a given rather than seeking to reflect the need to contribute to net zero carbon and tackling illegal levels of air pollution. As a minimum, there should be no increase in vehicle trips.

Furthermore, despite 39 per cent of Luton Airport passengers having their origin or destination within Greater London, there is very limited consideration of how additional passengers would be accommodated on London's transport network. It is incumbent on Luton Airport to show how its expansion plans would impact London's roads and railways, and what this would mean for congestion and air quality in the city. Further information about these issues is provided in the attached appendix.

With regard to the noise impacts, Luton Airport must ensure these proposals do not exacerbate impacts on health and quality of life and that any noise reduction resulting from new technologies benefits residents, rather than being banked to enable more flights.

We are acutely aware of the particular challenge that the aviation sector and its workers have faced during the pandemic. But as the sector starts to rebuild, it must embrace decarbonisation to ensure a green recovery. Expansion threatens to undermine our efforts to decarbonise and we cannot support Luton Airport's unambitious proposals without your being able to demonstrate how they are compatible with our net zero carbon and wider environmental ambitions.

Yours sincerely

A handwritten signature in black ink that reads "Alex Williams". The signature is written in a cursive, flowing style.

Alex Williams
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Luton Airport Expansion DCO consultation response

Appendix: Surface access

Introduction

This submission sets out our detailed response to Luton Airport's expansion DCO consultation with regard to surface access and associated emissions. We have concerns across a number of topic areas including the modelling assessment, proposed targets for sustainable transport mode share and emissions, as well as the surface access interventions proposed by Luton Airport to support its growth.

Modelling Assessment

The use of 2016 and 2017 as the base years for transport modelling and forecasting raises concerns. Data published by the Civil Aviation Authority (CAA) for the period 2016-2019 indicates a significant change in passenger travel patterns at Luton Airport during this period. This is outlined in Table 1.

Table 1- 2016-2019 Luton Airport CAA passenger mode split data

Mode	Year (%)			
	2016	2017	2018	2019
Car	51	52	47	40
Taxi	17	18	16	16
Bus / Coach	16	14	16	22
Rail	16	17	20	21
Passengers (000's)	16,501	15,552	16,412	17,369

[Numbers are subject to rounding]

Between 2016 and 2019 the car/taxi mode share fell from 68 to 56 per cent, whilst the public transport mode share grew from 32 per cent to 43 per cent. An incorrect baseline risks distorting the impacts and it is not clear how this variation in mode share between 2019 and 2016/2017 has been captured in the modelling and assessment.

It is also of concern that the modelling assessment does not appear to take any account of the impact of airport expansion on London's transport network. This is an issue because CAA data identifies Greater London as Luton Airport's primary catchment, accounting for 39 per cent of (non-transfer) passenger trips in 2019. If this proportion were to remain unchanged, expansion would increase the number of passengers travelling between London and the airport from around 6.8 million passengers per annum (mppa) to almost 12.5 mppa. The potential impacts on London's transport network as a result of an increase of this scale requires assessment as part of the DCO application.

Highway Modelling

It is therefore vital that an assessment of the expansion proposals on London's road network is undertaken. The 'Full Modelled Area' of the Central Bedfordshire and Luton Transport Model for Luton Airport (CBLTM-LTN) does not extend beyond the M25. Options to assess impacts in London include increasing the geographical scope of the 'Full Modelled Area' or making use of TfL's LoHAM model – i.e. adding the scheme demand to the LoHAM Reference Case models to compare the traffic impacts with and without the scheme.

It is noted that the central case modelling assumption is that parking and forecourt charges apply broadly as currently in the future year assessment. This is despite proposals to introduce road user charging alongside airport expansion. The modelling assessment should fully assess this as a mitigation measure, detailing its impact on the road network and its ability to stimulate mode shift towards sustainable modes.

Rail Modelling

The overall transport modelling assessment is heavily weighted towards the highway network, with very little focus on the rail network and other public transport modes. This results in a very incomplete assessment, mostly limited to boarders and alighters of services only at Luton Airport Parkway. Even then, the impacts on Thameslink (GTR) services and East Midlands Railway services at this station have not been assessed on a comparable basis.

The conclusions drawn on rail capacity also appear contradictory. The assessment presented in section 9.7 of the Transport Strategy indicates that rail services would operate at less than 50 per cent of their total capacity in the peak. Yet, it is suggested in section 7.6 of the Transport Strategy that it would be difficult to drive further increases in rail trips without impacting on other rail users – i.e. constrained by limited capacity.

In scoping a thorough assessment, Luton Airport should consider the potential capacity impacts on its rail catchment more widely. This could include assessment of additional passenger flows on station capacity at Luton Airport Parkway, particularly the connection between National Rail and Luton DART services. The assessment should also detail the effect of additional passenger flows on other key interchanges including West Hampstead, Farringdon and St Pancras, and the resulting impact on TfL services.

Sustainable mode share

The public transport targets are inadequate and in the first phase actually constitutes a decrease in sustainable mode share compared to pre-pandemic levels, from 43.5 per cent in 2019 to just 40 per cent in 2027. This increases marginally, to just 45 per cent, by 2039. This is wholly unacceptable.

If Luton Airport is committed to supporting London and UK targets for securing net zero carbon emissions, it needs to demonstrate how the scheme can be delivered, at a minimum, without any increase in highway trips over base (2019 pre-pandemic) levels. This should be reflected in a mode share target that would not result in any further growth in highway trips.

It is of deep concern that vehicle trips are forecast to increase by 1,200 in the AM peak with the scheme in 2043, a 39 per cent uplift compared with the 18mppa do-minimum. Moreover, the provision of an extra 6,100 passenger car parking spaces (up from 9,900 to 16,000) – a 62 per cent increase, appears to be wholly at odds with any aspiration to increase the airport's sustainable transport mode share.

It is also not credible to assume so little sustainable mode shift given the transformation in rail connectivity that the airport is experiencing, starting this year. The opening of the DART will soon finally end Luton's status as the last London airport without a direct rail connection. This will greatly improve access (and perceptions of access) from central London and along the Thameslink corridor. Meanwhile the Elizabeth Line, also opening this year, will create a wide range of convenient onward connections via Farringdon, improving access to the airport from across London and the south east.

On this basis, the proposed 2043 passenger rail mode share of 27 per cent – compared to 21 per cent in 2019 – is extremely unambitious. Indeed, this would be lower than the passenger rail mode share achieved by each of the other five London airports in 2019, and should be revised accordingly to truly reflect the airport's future rail connectivity.

Bus and coach will also have a part to play in driving mode shift from locations away from the rail corridor and look forward to hearing about the concrete steps that Luton Airport will take to strengthen existing and develop new services, beyond any enhancements of bus and coach facilities on site.

Recognising the density of the airport's London catchment – and the planned rail improvements which will disproportionately benefit access to London – we recommend supplementing the general sustainable mode share targets with the development and adoption of mode share targets which are specific to trips to/from London.

One question that arises is on exactly what basis the 40 and 45 per cent sustainable mode share targets have been derived. "Technical evidence" is cited but not provided. Luton Airport needs to clearly set this out and how the targets align with its proposals for Green Controlled Growth.

In determining future mode share targets for staff trips, Luton Airport should likewise take account of surface access improvements delivered since 2018, when the airport achieved a sustainable mode share of 31 per cent for staff. The Luton DART as well as potential bus, cycling and walking enhancements to be fleshed out as part of airport expansion should increase the attractiveness for staff of public transport and active travel. Previously observed usage of sustainable modes by staff should form the starting point for future targets, rather than an upper limit.

Emissions

The proposed Green Controlled Growth limit value targets for air quality and carbon emissions resulting from surface access appear to take the forecast increase in vehicle trips as a given, rather than reflect the need for mode shift to contribute to environmental goals including net zero carbon and addressing illegal levels of air pollution. As such, the proposed limit value targets have been determined on a wholly inappropriate basis.

Interventions

We believe that Luton Airport's growth aspirations are missing the adequate package of measures required to secure sufficient sustainable mode shift. The proposal to extend the DART to the new Terminal 2 will maintain the airport's new rail connectivity as it expands. Beyond this however, the focus of proposed measures is to expand the airport's highway network and increase car parking provision, both of which will only serve to promote use of private vehicles to the airport. This is entirely counterproductive if seeking to drive sustainable mode shift.

The tentative proposal for introduction of road user charging is welcomed. One of the most important aspects of mode choice is the differential cost in travelling to the airport by car compared to that by public transport. Road user charging would increase the cost differential between the two, facilitating a shift from car/taxi to public transport. Aligning road user charging with other measures to promote sustainable transport would maximise its effectiveness in stimulating mode shift. Indeed, hypothecation of road user charging should be used to fund sustainable surface access improvements. However, limited information has been

provided as to how a road user charging scheme would operate, alongside existing car parking and forecourt charges, nor have the impacts been modelled.

An adequate assessment of rail flows, and based on acceptable public transport mode share, will help identify public transport interventions required, for example at key Thameslink interchanges. A particular focus should be made on trips from inner and outer London locations without easy access to the Thameslink corridor. Most such trips are currently likely to be made by car/taxi but consideration should be given to more sustainable alternatives, such as by bus/coach to a Thameslink station or, indeed, direct to the airport.

In developing a coherent strategy for managing road access, targets also should be set for passenger and staff trips by zero-emission vehicles. There should also be greatly increased provision of rapid electric charging points in existing car parks for staff, passengers and taxis.