

London Luton Airport ASAS 2012-2017 - Consultation Summary

This table summarises comments received during the public consultation on London Luton Airport's draft Airport Surface Access Strategy (ASAS), conducted between 22 November 2011 and 6 January 2012. A response to each comment is included, along with the changes made to the ASAS where appropriate. Comments are grouped by section for convenience, although comments may also relate to other sections or be over-arching.

Ref.	Consultee Comment	Response to comment	ASAS revision
General comments			
0.1	Too long. No executive summary.	We consider the length reasonable given the evidence-based approach taken. An executive summary has been created and posted on the community website alongside the final ASAS.	--
0.2	Short consultation process	Accepted.	--
0.3	Requirement for postal responses	Accepted. Future consultation will incorporate formal email approach.	--
0.4	Welcomes greater evidence base and use of weighted data	Welcomed	--
0.5	No mention of future growth or development	The ASAS is undertaken by London Luton Airport Operations Ltd (LLAOL). It addresses the period to 2017 and is suitable for current operations and simple passenger growth. In line with the 2001 Development Brief, the airport is to focus on making the most of the existing site. The Borough Council's holding company London Luton Airport Ltd, which owns the airport, has appointed consultants to look at the longer-term. This is outside the scope of LLAOL.	--
0.6	Lack of monitoring from previous strategies	A monitoring update of the 2009 Interim ASAS was published in January 2011. As part of the development of the 2012-2017 ASAS, the previous objectives and targets were reviewed and compared to actual mode shift performance. Progress against previous targets is described in Section 6.1 and 6.2 as part of the discussion of the new targets.	--
0.7	ASAS does not address existing congestion on road network around airport or at locations in Hertfordshire. Increase in Airport-related traffic could affect operation of roads in Hertfordshire. Traffic from other locations travels through Hertfordshire to reach the Airport. Refer to existing available traffic modelling.	The ASAS relates broadly to current operations and is focused on reducing airport-related car trips, for both passengers and staff. London Luton Airport will be happy to assist local authorities to understand if any airport-related traffic is impacting on local road networks in particular areas.	--
0.8	ASAS is very descriptive. Clearer presentation needed, with more maps and diagrams	The ASAS aims in part to provide an evidence base and a useful resource for stakeholders, and this is one reason for providing detailed data tables and charts. The Annexes include maps relating to the key areas of interest to the ASAS.	--
Chapter 1 - Introduction			
	No comments		
Chapter 2 - Vision			
	No comments		
Chapter 3 - Policy Context			

Ref.	Consultee Comment	Response to comment	ASAS revision
3.1	Section 3.3 mentions Luton LTP3 but not Central Beds or Herts. Airport travel affects these areas.	The Central Bedfordshire and Herts LTPs are now noted in this section.	Added reference to Central Beds and Herts LTPs after existing text in 3.3
3.2	No mention of 2013 Framework for Aviation	Mentioned in 3.2.1. Text added to say that new policies and legislation will be reviewed and ASAS amended if required	Text in 3.2 changed accordingly.
Chapter 4 - London Luton Airport Today			
4.1	Surface access is 'tinkering', no clear vision of how it all fits together. Real issue is road access	ASAS represents a realistic strategy that is appropriate for the nature of the airport. Road access issues are already being tackled as described within 4.10.	--
4.2	Local bus services do not work/coordinate with flights. For example, Cambridge-LTN service is two-hourly - not frequent enough or early enough.	The public transport improvements listed in the action plans would include improved frequency and/or hours as appropriate to each route. There is a specific action plan item for improving the rail-bus access from Cambridge via Hitchin.	Add to 4.2.12 that there are potential opportunities to improve service spans and/or frequencies of some routes.
4.3	High parking charges	Parking charges are set based on a number of different factors and are kept under continual review, ensuring that they are competitive.	--
4.4	Traffic delays on access road and in CTA	London Luton Airport has implemented short-term measures to reduce congestion on the main access road to the CTA. London Luton Airport has submitted proposals for planning consent to improve access along the main road into the short term car park, medium term car park and the CTA. These proposals will allow both public and private transport to have easier and more reliable access to the Airport.	4.10.3 updated
4.5	Suggestions for improving access road capacity	as per comment 4.4	as per comment 4.4
4.6	Completely re-vamp the whole terminal access area	as per comment 4.4	as per comment 4.4
4.7	No description of existing condition of surrounding road network. Traffic figures in Appendix B are not used to establish a baseline or a target. More detail on the traffic figures is needed.	The current ASAS is focused on identifying opportunities to attract modal shift from car travel, rather than being directly focused on identifying congestion-reduction schemes. This is the reason for the focus on travel markets rather than traffic figures. The Annual Monitoring Reports (AMRs) provide more information on the traffic counts, including a map.	Reference to AMRs added to footnote in Table B1
4.8	Para 4.6.5, valet service by off-airport parking operators: this runs against the strategy. Should be a dedicated bus shuttle instead. Existing congestion caused by off-airport parking.	Section 4.6 already refers to the impact of valet services. These and indeed all off-airport services are commercial services run by private operators, although London Luton Airport maintains discussions with them in relation to the services they conduct at the Airport.	--
4.9	Section 4.8 Walking and cycling: no assessment has been made of existing walking and cycling routes/infrastructure	Action plan for staff travel (Table 6.2) includes actions to address walking and cycling access and facilities. This would include an assessment of current conditions.	Re-word walking/cycling action 1 in Table 6.2 to 'develop a strategy for improving <u>walking and cycling</u> access to the airport, <u>starting with an assessment of the existing infrastructure to identify opportunities for improvement</u> '. (additions underlined)
4.10	Section 4.8 Walking and Cycling: Luton and Dunstable Area Cycle Guide should be appended to the strategy	Section 4.8 has been amended to include reference to the guide and its availability online.	Section 4.8 amended accordingly
4.11	Section 4.11 (page 18), Onward travel centre: Area cycle guide should be stocked and available	London Luton Airport will be glad to liaise with the local authorities to receive supplies of this guide.	--
Chapter 5 - Travel Patterns Today			

Ref.	Consultee Comment	Response to comment	ASAS revision
5.1	No information on business jet contribution to travel demand, hence car trip generation is understated.	Business jets are relatively small aircraft so make up only a small proportion of passengers. It is not considered that these are a priority at this stage. However, during the course of the ASAS period, this can be investigated further if required.	--
5.2	Underlying reasons for differences in performance compared to other airports not identified. LTN performs poorly compared to other south-east airports.	A more detailed benchmarking exercise was undertaken as part of the ASAS development. It should be noted that Heathrow, Gatwick and Stansted (also Manchester) have much greater passenger volumes, which makes more public transport provision viable, and each of these benefit from rail stations in the terminal areas, which is not currently feasible at LTN. A fairer comparison is between LTN and Edinburgh or Birmingham - and LTN performs favourably compared to these as well as to the much larger Manchester airport.	--
5.3	Impact of Airport on transport network is not considered in as much detail as earlier documents	The level of detail is broadly comparable to earlier ASAS documents. The current ASAS is focused on identifying opportunities to attract modal shift from car travel and the additional attention given to passenger origins reflects this.	--
5.4	Table 5.5 (p.25): LU postal area is not just Luton but also Dunstable and Houghton Regis	Text already mentions this in relation to Dunstable and Leighton Buzzard; reference to Houghton Regis will be added	Section 5.6.3 amended accordingly
Chapter 6 - Objectives and Action Plans			
6.1	The 40% public transport target for passengers remains unchanged despite not being achieved by the previous ASAS. There are no sanctions for failure, nor specific actions or costed programmes of work to achieve any specific contribution towards the target. Little detail on how they are to be achieved.	The target, which has been agreed with ATF partners, is deliberately ambitious. LLAOL and its partners have set out this target publicly, will set out progress publicly (see 7.4) and will be judged accordingly. Actions are listed in section 6, along with their potential contribution to the target. The level of detail for the actions is considered appropriate at this strategic level.	Add after 6.2.5 and 6.3.3 "London Luton Airport will work with stakeholders over the course of the ASAS period to develop, implement and refine these actions."
6.2	Targets could be more stretching	The targets have been set in agreement with the Airport Transport Forum, and are already considered stretching for the reasons given in Section 6. The large number of action plan items listed reflects this.	--
6.3	Access by taxi should be treated like car access - and discouraged due to needing two trips per flight rather than one. Off-site parking or coach hubs would make more sense. On-site car parking should be reduced.	Action Plan for passenger access (Table 6.1) refers to targeting the existing car and taxi markets in many of the actions. Realistically, many passengers will still prefer to park near the terminal rather than use a feeder shuttle and these passengers need to be served. Action Plan refers to encouraging journeys via Milton Keynes Coachway.	--
6.4	Recent announcement about new road access is aimed at improving access by car - not consistent with aspiration to reduce that access. Unlikely to have no effect on modal share; this needs to be assessed.	The improved road access will also benefit bus and rail (shuttle bus) access, since these modes rely on road access. Any delays to buses are a key concern to passengers and operators. London Luton Airport aims to provide high-quality service to all its customers, including those who have no reasonable alternative to driving.	Section 4.10 now also mentions benefits to public transport services.
6.5	Objective 1 lists no baseline. Is 2009 the baseline?	At the time of conducting the analysis, the 2009 data was the most recent available. Text has been clarified.	Para 6.2.5 revised to clarify this.

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6.6	Table 6.1 (passenger objective action plan): Cross-selling of public transport tickets should be Dec 2013, not Dec 2014. Should include encouraging bus and rail operators. Explore discounted travel between St Pancras and Luton Airport Parkway for airline passengers.	December 2014 is considered reasonable as dealing with a number of third parties to achieve this target with airlines, bus operators and rail operators will require time. It is agreed that rail and bus operators will need to be involved in the technical processes. St Pancras to Luton Airport Parkway is indeed an important corridor; the exact commercial solutions need further discussion as this action envisages, especially if discounting is part of the solution.	Action item amended to include reference to bus and rail industries.
6.7	Table 6.2 (Staff objective action plan) - walking and cycling: Should organise events in Bike Week, Walk to Work Week, National Liftshare Week	This is agreed. London Luton Airport has already organised activities for National Liftshare Week. This and other similar activities would be undertaken as part of the Framework Travel Plan and individual employers' Travel Plans, as listed in the Action Plan.	--
6.8	Table 6.2 (Staff objective action plan) - walking and cycling: Needs site audit of existing facilities on site, eg cycle spaces and showers	The actions listed to develop strategies would include a site audit as part of the work.	Re-word walking/cycling action 2 in Table 6.2 to 'develop a strategy for improving facilities at the Airport for cyclists and walkers, <u>starting with an assessment of the existing facilities to identify opportunities for improvement</u> '. (additions underlined)
6.9	Table 6.2 (Staff objective action plan) - buses and coaches item 3: should also cover Dunstable as required	Accepted	Change text to refer to 'Luton/Dunstable conurbation' rather than 'Luton'.
6.10	Any additional evidence to support CAA survey data?	The CAA survey data was the primary source of evidence for identifying the passenger markets to focus on. As each action is investigated in more detail with stakeholders, the Airport would welcome additional evidence that stakeholders have available.	--
6.11	How will bus operators be supported?	Through the ASAS policy framework and through the Airport's own travel planning work.	--
6.12	Were locations in action plan included due to having existing routes? What about network expansion possibilities?	Locations in the action plan were based on the identified opportunities for mode shift. In general, the key areas have existing bus routes and the expectation is that these would be developed where possible. Network expansion possibilities have also been considered (e.g. action 6 under buses and coaches in Table 6.1).	--
6.13	What about Harpenden?	Harpenden is covered by action 4 under buses and coaches in Table 6.1 (the 321 corridor to St Albans). The text will be amended to clarify this.	Table 6.1 amended accordingly.
6.14	Only two objectives, with many actions. Could be more balanced.	The objectives, which were agreed by the ATF, are deliberately focused on the key mode shift outcomes and are therefore considered appropriate.	--
6.15	Some actions are vague or constrained	The actions are intended as a strategic work programme of areas to be tackled, and each one will be refined as it is developed.	--
6.16	Supports action to improve service for passengers travelling by rail/bus via Hitchin	This is welcomed.	--
6.17	No specific reference to how the 13% of passengers coming from Herts are addressed	The action plan items include several that relate to key Hertfordshire origins and the extent of the market targeted by these is noted under each action.	-

Chapter 7 - Stakeholder Engagement, Consultation and Monitoring

Ref.	Consultee Comment	Response to comment	ASAS revision
7.1	No formal or informal liaison process set out	Section 7.2 refers to the Aiport Transport Forum and the airport's wider engagement with Stakeholders. Both North Herts DC and Herts CC will be invited to take part in the ATF in future.	--

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7.2	Section 7.3, Monitoring (p.32): Strategy needs a named person as coordinator - similar to Travel Plan practice. Roles and responsibilities should be defined.	This is agreed. A named person will be added	Environment Manager is now named as coordinator in section 7.2.
Appendices			
8.1	Appendix B (p.40), traffic flows: needs current data (only shows 2009)	The traffic data are taken from the airport's Annual Monitoring Report. The 2009 data are the most recent available from this source.	--
8.2	Appendix B (p.40), traffic flows: Table heading is incorrect	This has been corrected.	Heading corrected
8.3	Para C8.2 (Car and taxi use by catchment): Modal shift of 1 in 3 car/taxi passengers from Milton Keynes is unrealistic	As text describes, this statistic is to give an idea of how the figures translate into overall mode split. The actual ambition for Milton Keynes district is a much lower figure as described in Table 6.1.	Omit the final sentence from C8.2, to avoid this confusion.