London Luton Airport

Sustainability report 2022

Contents

Our responsible business strategy

At London Luton Airport (LLA), we recognise our crucial role in shaping a sustainable future. We believe that being a responsible business is not only the right thing to do, it also makes us a better business. We are committed to driving improvements for our people, our community, the economy and our environment through our Responsible Business Strategy (RBS).

Despite the significant challenges posed by the COVID-19 pandemic, we have made great strides towards our RBS goals. We are updating our strategy in 2023 to reflect our ongoing commitment to create a sustainable future for all. The updated RBS will introduce new targets and objectives, reflecting our evolving priorities and the latest industry standards. By taking bold action to reduce our environmental impact, foster economic growth and support our community, we can create a better world for generations to come.

RECOGNITION

ACA airport carbon accreditation - optimisation

ACA airport carbon accreditation - reduction

ACI customer service accreditation: level 1

ACI airport health accreditation

REPORTING SCOPE AND BOUNDARIES

This Sustainability Report provides an account of the management approach and performance trends of the material, environmental and social issues for London Luton Airport Operations Limited. The reporting period is the 2022 calendar year, but the Report also includes historical performance data. This Report includes the activities and impacts that are under the control or significant influence of London Luton Airport Operations Limited.

This Report contains standard disclosures from the Global Reporting Initiative (GRI) Standard.

CAUTIONARY STATEMENT

This Report may contain forward-looking statements which are made in good faith and are based on current expectations or beliefs, as well as assumptions about future events. You can sometimes, but not always, identify these statements by the use of a date in the future or such words as "will", "anticipate", "estimate", "expect", "project", "intend", "plan", "should", "may", "assume" and other similar words. By their nature, forward-looking statements are inherently predictive and speculative and involve risk and uncertainty because they relate to events and depend on circumstances that will occur in the future. You should not place undue reliance on these forward-looking statements, which are not a guarantee of future performance and are subject to factors that could cause our actual results to differ materially from those expressed or implied by these statements. The Company undertakes no obligation to update any forward-looking statements contained in this Report, whether as a result of new information, future events or otherwise.
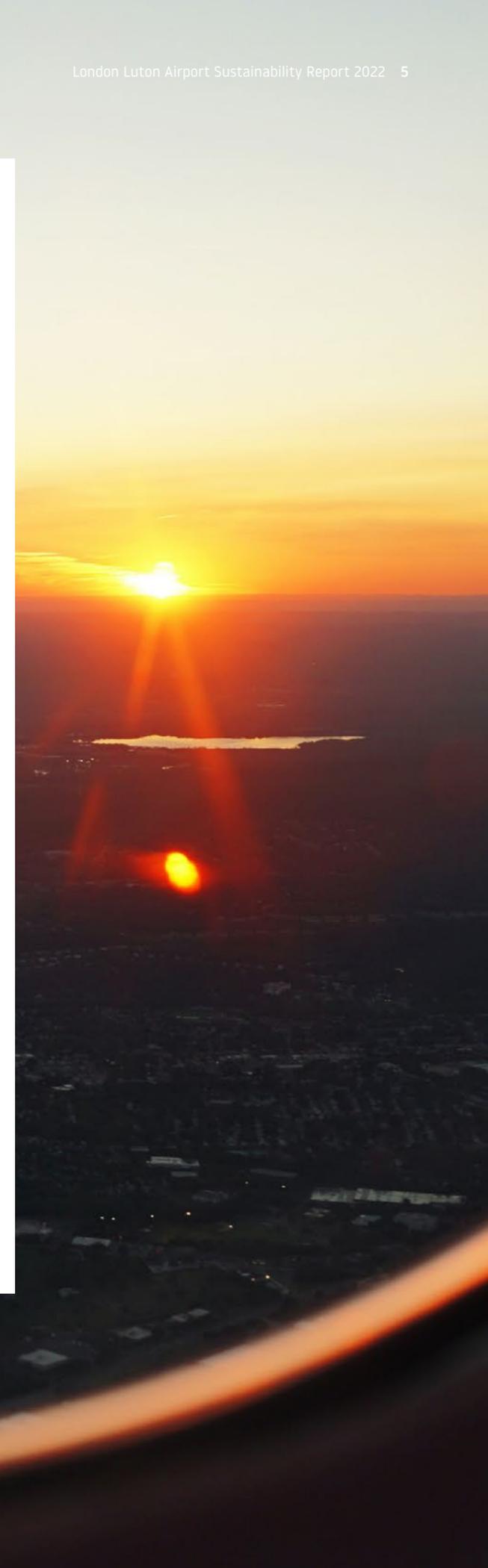
Introduction from our CEO

I'm delighted to introduce our 2022 Responsible Business report. It's wonderful to share with you the progress we've made on our sustainability programme during the year.

2022 has seen a gear change in our sustainability programme. During the pandemic we had to pause some of our programmes, but we used the time to take stock and recalibrate our long-term vision for sustainability at London Luton Airport. This year, with passenger volumes gradually returning to previous levels, we were able to restart many of our initiatives and published several new strategies, including our Net Zero roadmap and our new Health, Safety and Wellbeing strategy. You will notice that this year's report is more expansive, as we've integrated our annual monitoring report and the RBS report.

Following the challenges of COVID, I'm particularly conscious of what each journey means - the chance to see loved ones again, to create treasured memories from family holidays or to help rebuild our economy. Growing passenger numbers also means new jobs at the airport, in our supply chain and airline partners, and due to London Luton Airport's unique ownership structure, income for Luton Council to fund local services.

With the value of each journey in mind, we are focussed on delivering exceptional experience for every guest. This year we rolled out our new guest experience strategy, the LLA Way, and delivered training to more than 650 of our team. I'm delighted to say that our continued performance has been recognised, winning silver at the UK Customer Experience awards. We were also ranked among the UK's top airports in the prestigious Conde Nast Reader's Choice awards.

Great customer experience is delivered by a great team, and we delivered some exciting developments this year for our people. We implemented a new salary structure, increasing pay and parental leave entitlements and achieved Real Living Wage accreditation, demonstrating our commitment to being a good place to work. We also published a new Health, Safety and Wellbeing strategy and provided NEBOSH Health and Safety leadership training to our senior managers.

It's my firm belief that a great team must attract, retain, and develop the best talent, regardless of background, identity or belief. This is enshrined in our Responsible Business Strategy. We've worked hard to date to make progress on some of the most pressing industry-wide issues, especially the under-representation of women in engineering, through initiatives like the Women in Aviation programme. More needs to be done and I'm delighted that in 2022 we published our first comprehensive Equity, Diversity, and Inclusion strategy, building on extensive consultation with our team over the previous year. I look forward to being able to provide updates on our progress in future reports.

We've also seen success in our community programme, which seeks to support community health and wellbeing, develop skills, and tackle poverty. We contributed £150,000 to our Community Trust Fund which has helped more than 13,000 people through the 23 grants issued during the year. Our charity and volunteering initiatives also raised more than £60,000 for Luton Foodbank and East Anglian Air Ambulance, our two charity partners.

We also launched a new Greener Future Fund, partly funded through our existing Community Trust grant funding process, making £100,000 available to local schools, charities, and community groups to take action on biodiversity and to reduce carbon emissions. Supporting the local economy is a priority for us, and we work hard to use local suppliers wherever possible, even running events to help businesses bid for our contracts. I'm proud that in 2022 more than 53% of our spend was with local suppliers within 25 miles of the airport.

Our support for the local community extends far beyond this. As an airport that serves as an international gateway, connecting people, places, and cultures, it was only natural for us to partner with local authorities and volunteer groups to help Ukrainian refugees arriving in the UK. Our arrivals Hub provided support and advice to more than 30,000 Ukrainian refugees and their host families, as they began their new lives in the UK.

As passenger numbers recover, I'm mindful of the challenge the aviation sector faces to meet the continued growth in demand for travel and all the benefits this brings for people and our economy, whilst delivering the promise of Net Zero carbon and limiting the environmental impact on our community. The UK's Government's approach, Jet Zero, is built around the bold vision that we can do both and we will work in partnership with the airport owner, Luton Rising, passengers, airlines, and our suppliers to play a leading role.

We launched our Net Zero roadmap this year, as well as our air quality plan. Carbon emissions at LLA are dominated by passengers travelling to and from the airport, and aircraft emissions. Our Net Zero roadmap sets the key areas of action to reduce our own emissions, including ambitious targets for on-site renewables, energy efficiency and zero emissions vehicles, and supporting action for surface access and aircraft emissions, including financial incentives to encourage the use of newer more fuel-efficient aircraft, and supporting the use of Sustainable Aviation Fuels.

2022 ended on a high, with a visit from His Majesty King Charles III who was among the first to travel on the new DART transit system, which links the airport to Luton Airport Parkway railway station. The DART, built by Luton Rising, together with the Luton Airport Express, not only provides better access to rail passengers across London, the Southeast and the Midlands, it is just one initiative to help reduce carbon emissions and air quality impact from passengers getting to and from the airport.

I am proud of the progress we've made, the investments to embed sustainability into our business, and the recognition we have received, including being named Sector Leader with a 100% score in the 2022 GRESB benchmark for ESG data. I want to take this opportunity to express my deep gratitude to my colleagues and our partners who have worked so hard to deliver progress on these important programmes. There is, however, still much to do and we will update our sustainability strategy and targets in 2023 to ensure we continue to take a leading role in sustainable aviation.

Alberto Martin
CEO, London Luton Airport

About London Luton Airport

As one of the UK's busiest airports, London Luton Airport (LLA) plays a vital role in connecting people and places across the world. In 2022, we proudly carried 13,136,952 passengers, marking a significant increase (186%) from the previous year as demand for air travel continued to increase following the COVID-19 pandemic.

London Luton Airport is owned by Luton Council (LC) through Luton Rising and operated on a concession basis by London Luton Airport Operations Limited (LLAOL). LLAOL is owned by Aena, the world's largest airport operator, and Infrabridge, a global investment manager.

At LLA, we are committed to delivering an exceptional travel experience for all our guests, while also driving sustainability and responsibility across our operations. Through our state-of-the-art facilities, cutting-edge technology and world-class service, we strive to set the standard for excellence in aviation.

OUR UNIQUE APPROACH

London Luton Airport is unique in that our freeholder, Luton Rising, is owned by Luton Council (LC). We work in collaboration with our partners Luton Rising and LC, and engage closely with our neighbours, local residents and regional policy makers. This means we have a good view of our impacts as a neighbour and business partner.

Luton Rising has developed a long-term plan for the airport which is focused on growing the benefits of the airport to the community. The plan includes an aspiration to grow passenger numbers, community investment and jobs whilst leading on sustainability through a Green Controlled Growth framework.

We have developed our Responsible Business Strategy to align with LC's sustainability objectives and have grown our sustainability team to deliver it. As a business owned by the world's leading airport operator and a global investor, we take our broader corporate responsibilities seriously.

We strive to deliver our corporate and societal objectives, from how we treat our employees and business partners, to reducing our environmental footprint and improving customer experience. As a responsible business partner, we work hard to align our stakeholders' varied interests to ensure sustainable outcomes.

"Luton Rising is an airport owner entirely focused on supporting and improving people's lives, and driving economic and employment growth, both in Luton and neighbouring communities. Working together with our operator, we have developed plans to grow LLA, creating around 11,000 new jobs, generating an additional £1.5bn in economic activity and increasing our £7.5m annual contribution to vital voluntary and charitable services to build better lives.

By working in collaboration with all our partners we believe we can make the airport a leader in sustainable aviation and will endeavour to do everything we can to tackle the climate crisis. This is why we are proposing a new environmentally focused approach to growth at the airport as part of our application for a Development Consent Order. A Green Controlled Growth framework would introduce binding limits for the airport's noise, carbon, air quality and surface access impacts. These environmental limits are at the heart of our strategy to create employment, prosperity, and positive social impact."

— Nick Prowse, Interim Managing Director, Luton Rising

SUSTAINABILITY VISION

Our Responsible Business Strategy sets out our ambition to be champions in sustainable aviation. We aim to be a good neighbour and employer, to minimise our environmental impact and to benefit our community.

aena   INFRABRIDGE

Operating as London Luton Airport Operations Ltd (LLAOL)

Luton Rising   Luton

THE AIRPORT'S LIFECYCLE COVERS FOUR MAIN AREAS:

1. SURFACE ACCESS:
GETTING TO AND FROM THE AIRPORT

Guests, employees and goods travel to and from the airport using a wide range of modes of travel. The airport is served by Luton Airport Parkway station and good road access, along with excellent coach, bus and taxi services. We directly operate short- and long-stay car parks on-site and a kiss-and-fly facility, and work with other transport providers to make the airport accessible to everyone.

2. OUR OPERATIONS:
TERMINAL, SECURITY, CARGO, MAINTENANCE, FIREFIGHTING AND ADMINISTRATION

Our own operations focus on delivering a great experience for guests. We operate the terminal, maintain the buildings and airfield, and provide all airport security and firefighting functions. Our team also includes a wide range of office-based support functions, and we have an administrative office close to the airport.

3. THIRD-PARTY OPERATIONS:
CONCESSIONS, AIRLINE GROUND OPERATIONS AND GROUND CREW

Third parties are responsible for many activities at the airport. Terminal shops and restaurants are all run by concessionaires, and our airline partners also have significant operations to manage and maintain aircraft. Baggage handling is also managed by third parties. We don't control these processes directly but work closely with all on-site partners.

4. AIRFIELD OPERATIONS:
ARRIVALS AND DEPARTURES, AND AIRCRAFT GROUND MOVEMENTS

LLA's responsibility for aircraft includes arrival and departure, and movement on the ground. The airlines are responsible for aircraft, but we have a range of processes and controls in place to minimise noise, carbon emissions and risks.

Meet our sustainability team

Our sustainability team leads the delivery of our Responsible Business Strategy, working alongside colleagues across the business.

David Vazquez
Head of Sustainability

Liga Apsite
Net Zero Senior Manager

Jack Wright
Sustainability Performance Executive

Louise Hanlon
Community & CSR Manager

Nicole Walker
Net Zero Executive

Joshua Keating
Community & CSR Executive

Hannah Dunford
Sustainability Coordinator

Bethany Marx
Sustainability Executive

2022: Year in review

13.1m passengers
(2021: 5.5m passengers, 2020: 4.6m passengers)

187% higher than 2021

118,060 aircraft movements
(2021: 63,693, 2020: 61,558)

92% higher than 2021

32,001 tonnes of cargo
(2021: 26,108, 2020: 32,693)

23% higher than 2021

"This year, we took important steps for the airport to become Net Zero carbon by 2040. To do this, it will require every team in the airport to get involved, and I'm grateful to every single person who went the extra mile to embed better environmental and social practices into what they do."

— David Vazquez, Head of Sustainability

2022: Highlights

1

PUBLISHED OUR **NET ZERO ROADMAP**

NET ZERO 2040

2

BEGAN FEASIBILITY WORK TO BRING **ON-SITE SOLAR ELECTRICITY TO THE AIRPORT**

4

AS PART OF OUR COMMUNITY TRUST FUND WE LAUNCHED THE **GREENER FUTURE FUND** - £100K FOR LOCAL CARBON REDUCTION AND BIODIVERSITY PROJECTS

3

PUBLISHED A **NEW AIR QUALITY PLAN**

London Luton Airport
Air Quality Action Plan
December 2022

5

LAUNCHED OUR NEW **EQUITY, DIVERSITY, AND INCLUSION STRATEGY**

Image: Alberto, our CEO, with The King

8

RECEIVED A **VISIT FROM KING CHARLES** WHO TESTED THE BRAND NEW AIRPORT LIGHT RAIL LINK - DART

6

Living Wage Foundation

BECAME A **REAL LIVING WAGE EMPLOYER**

7

ALLOCATED **53% OF OUR PROCUREMENT SPEND TO LOCAL SUPPLIERS**

Supporting our community in 2022   LLA

£60k+ raised for our charity partners
East Anglian Air Ambulance & Luton Foodbank

13,400 hours of

23 grants awarded focused on our 3 community pillars...
• Healthy Today
• Skilled Tomorrow
• Alleviating Poverty
Awarded across 7 local authority areas

10% of LLA employees took part in activity including: litter picking and planting 380 trees

£150k to our Community Trust Fund (BLCF)

1,200 items of food, repeatedly donated to Luton Foodbank

£100k pledged to the Greener Future Fund plan - for carbon reduction & biodiversity initiatives

9

INVESTED OVER £300K INTO LOCAL COMMUNITY AND CHARITY PROJECTS THROUGH DONATIONS AND FUNDRAISING

Our priority issues

London Luton Airport is committed to addressing the most important Environmental, Social, and Governance (ESG) issues facing our business and our stakeholders. Our Responsible Business Strategy (RBS) reflects this commitment, focusing on the six priority areas we identified through a rigorous materiality assessment, based on the AA 1000 Assurance Standard.

These areas are important to our operations, local people, our employees and stakeholders. The materiality assessment involved an in-depth analysis of our current ESG management to identify potential for improvement, collating extensive input from our network of stakeholders. We also consulted partners and departments across the business, ensuring our strategy would work for everyone. We analysed sector peers and benchmarked our sustainability programme against best practice. We identified the most compelling ESG issues and prioritised them based on their impact on the airport and their importance to stakeholders.

STRATEGY FOCUS

Our Responsible Business Strategy concentrates on six key areas:

PAGE 16
Ensure environmental responsibility and efficiency

PAGE 87
Grow with our people

PAGE 59
Supporting our community

PAGE 101
Deliver great customer experience

PAGE 72
A Safe and Secure Airport

PAGE 110
Sustainable supply chain

Our work in each area is supported by a robust governance structure which provides the leadership and resources for effective management. We have identified actions and targets for each focus area, covering all our key environmental, social and governance issues.

Ensure environmental responsibility and efficiency

Our aim is to minimise the environmental impacts from London Luton Airport. We set targets to address our key issues, including carbon emissions, noise, waste and air quality.

IN THIS SECTION:

Highlights from 2022

Net Zero roadmap approved

By our sustainability committee. A large programme of investment to improve the airport has commenced, including low carbon vehicles, on-site renewables, and phasing out gas for heating.

Preparing to generate on-site renewable energy

After a feasibility study highlighted solar PV as the most viable route.

Luton DART light railway near completion

Providing fast, low carbon, well-connected travel to the airport.

Increased the number of NextGen aircraft

To a total of 17% of all aircraft, reducing both emissions and noise from flights. We achieved this by renegotiating contracts with airlines.

Air quality strategy completed

To further improve local air quality and reduce emissions.

Noise insulation programme underway

To install acoustic insulation in local residents' homes.

Researching electric vehicles

With a feasibility study to understand how to transition to a mainly electric fleet.

Improved our carbon footprint reporting

By aligning to key reporting frameworks, and improving the accuracy and detail behind our calculations.

"I'm the Net Zero Senior Manager, and my role is to develop and deliver the strategy to achieve Net Zero for our airport's carbon emissions. This year, we developed our Net Zero roadmap, which outlines the first steps in our journey; the focus is now on delivering on our commitments. I also engage and work closely with our partners and wider stakeholders to enable the reduction of overall carbon emissions across our airport."

— Liga Apsite, Net Zero Senior Manager

Carbon emissions, energy and climate change

Climate change is one of the most pressing issues facing humanity and future generations and will affect every aspect of society. Our airport, partners, local community and the wider aviation sector must work together to rapidly limit carbon emissions while preparing for the disruptive impacts of the climate crisis.

In 2019, the UK Government amended the Climate Change Act to commit the UK to achieve Net Zero carbon by 2050. Delivering Net Zero for aviation requires sector-wide collaboration and innovative new fuels, technologies and approaches. The Government published its Jet Zero strategy in 2022.

In 2020, we announced our own target to achieve Net Zero by 2040 for our airport (scope 1 and 2) emissions, publishing our Net Zero roadmap in 2022. The roadmap sets out six key action areas which focus on energy efficiency and low carbon energy, including on-site renewables, phasing out natural gas and adopting renewable fuels. We will also work with our partners, including the airport freeholder Luton Rising, suppliers, concessionaires and airline partners to deliver emissions reductions across our scope 3 sources.

We have also established a climate resilience plan to guide our response to changes in physical, market and regulatory environments driven by climate change.

Carbon emissions

CARBON EMISSIONS FROM OUR OPERATIONS (SCOPE 1 AND 2) MAKE UP 3% OF OUR TOTAL FOOTPRINT.

IN 2022, 52% OF OUR CARBON FOOTPRINT WAS FROM AIRCRAFT LANDING AND TAKE OFF.

43% WAS FROM PASSENGER SURFACE ACCESS.

Arriving at the airport
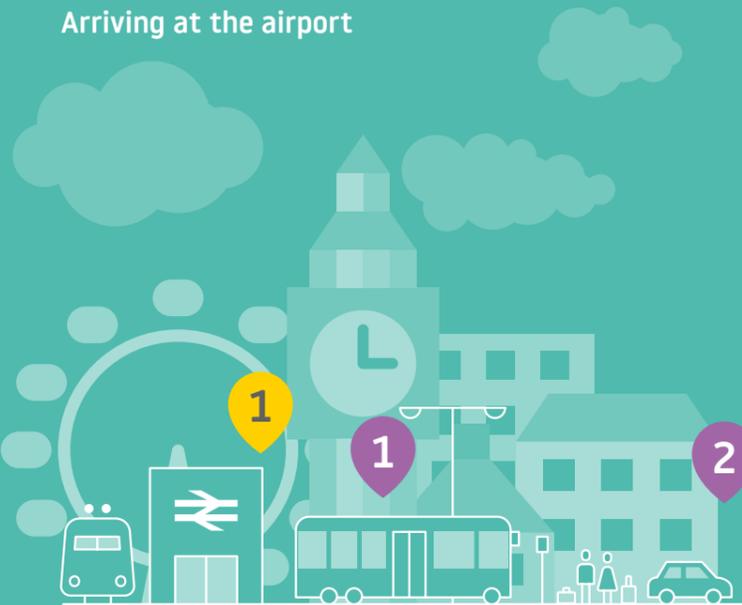
Terminal

Airfield and airspace

1000m
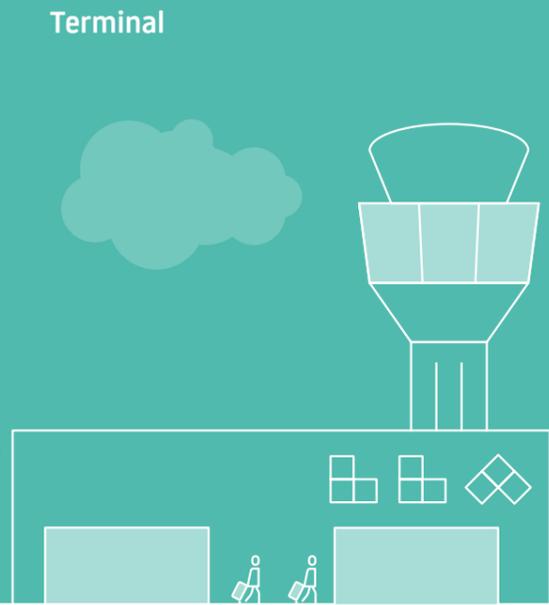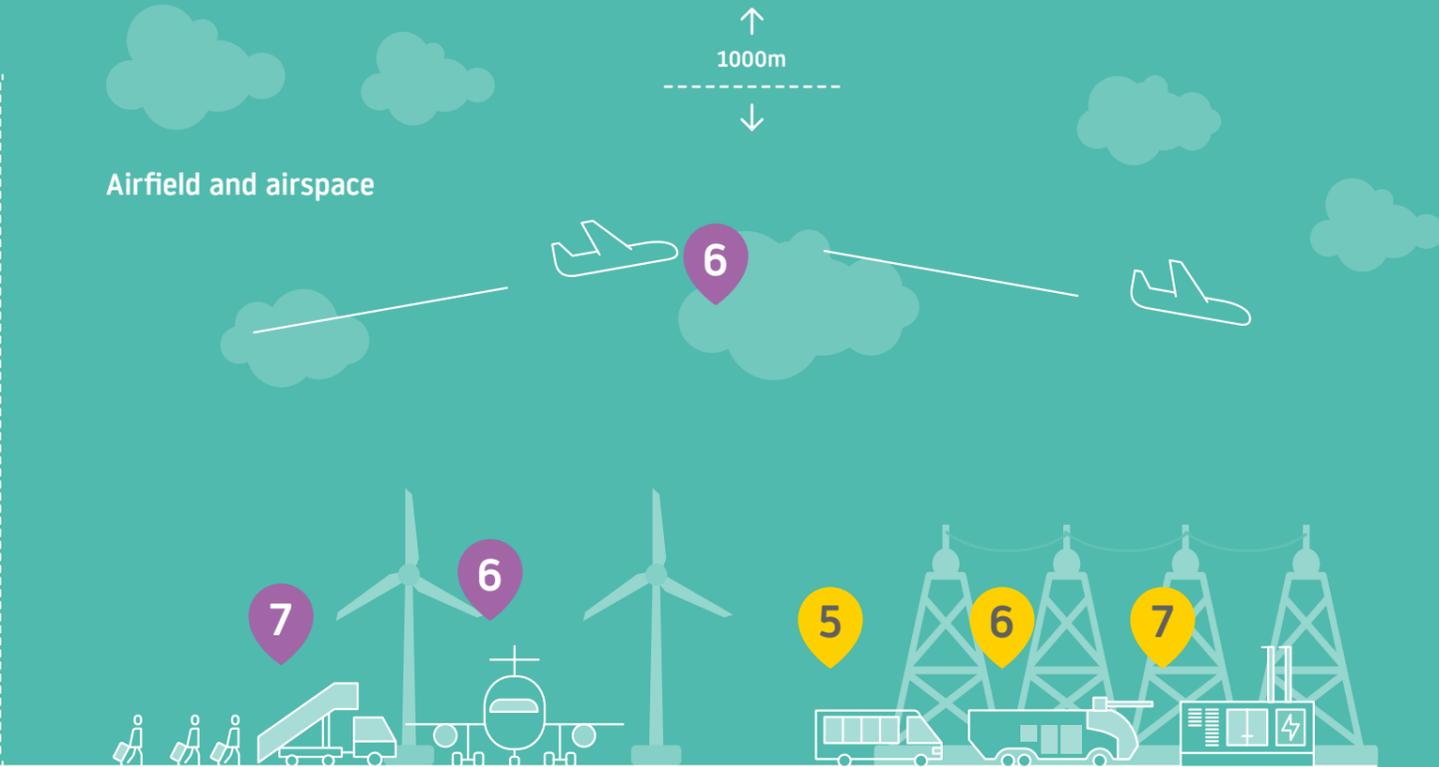
OUR AIRPORT EMISSIONS

Arriving at the airport
1 Colleague business travel

Terminal
2 Electricity use
3 Gas use for heating
4 Refrigerant losses

Airfield
5 Fuel use in vehicles
6 Firefighting activities
7 Fuel use for power

OUR PARTNERS' EMISSIONS

Arriving at the airport
1 Passenger travel
2 Colleague commute

Terminal
3 Electricity use by tenants
4 Water management
5 Waste management

Airfield and airspace
6 Aircraft landing and take-off
7 Ground support equipment

"I'm responsible for our sustainability reporting and engagement which includes managing our carbon emissions reporting, and leading on data analysis and insights in line with our sustainability strategy."

— Jack Wright, Sustainability Performance Executive

CARBON MANAGEMENT APPROACH

We are signatories to the aviation sector pledge to achieve Net Zero carbon emissions before 2050. Our goal is to achieve Net Zero emissions by 2040 for our airport emissions (scope 1 and 2).

Our partners' emissions (scope 3) account for a large proportion of our total emissions. We are therefore taking action both directly and in partnership with airlines, strategic partners (including Luton Council, Luton Rising and transport companies) and passengers to deliver on this ambitious programme. This includes supporting our partners to form clear commitments and a trajectory towards Net Zero.

LLA is part of Airports Council International Europe's Airport Carbon Accreditation scheme, the only global certification programme for airports.

We will use all the levers we have to influence and accelerate the sector-wide response to tackling the climate crisis, in particular:

- Incentivising airline partners to introduce NextGen, fuel efficient aircraft as swiftly as possible

- Working to introduce and expand the use of Sustainable Aviation Fuels

- Finding new ways to reduce the impacts of passenger surface access

- Actively monitoring and aligning with emerging policy from government, including the requirement for all airports in England to be Net Zero by 2040

- Actively participating in key industry forums, such as Sustainable Aviation, to collaborate across our sector to reduce environmental impacts

In 2022, the airport freeholder, Luton Rising, held a second statutory consultation on its proposals to increase the capacity of London Luton Airport to 32 million passengers per annum. A central part of its plan is a commitment to addressing environmental impacts. Luton Rising introduced Green Controlled Growth as a unique way to monitor, measure and use environmental factors to manage airport growth, rather than passenger numbers alone. This would set absolute limits on factors such as carbon emissions, air pollution and noise.

We recognise that any growth in passenger numbers must not compromise reaching the airport's Net Zero commitments.

That's why a rigorous environmental assessment was conducted as part of our planning application amendment to increase the passenger cap from 18 million to 19 million per annum. A final decision will now be made by the Secretary of States for Transport and Levelling Up, Communities and Housing following a public inquiry which was held during the autumn of 2022.

Furthermore, Luton Rising held a second statutory consultation on its proposals to increase the capacity of London Luton Airport to 32 million passengers per annum, which included a unique way to monitor, measure and use environmental factors to manage future growth, rather than passenger numbers alone known as 'Green Controlled Growth'. This would set absolute limits on factors such as carbon emissions, air pollution and noise.

Further details of how we are working with our partners to reduce emissions can be found later in this section.

OUR 2022 CARBON PERFORMANCE

We calculate our total carbon emissions (scope 1, 2 and 3) in line with the GHG Protocol, the world's most widely used greenhouse gas accounting standards. We follow industry best practice in our methodology and seek validation via the Airport Carbon Accreditation carbon management certification standard. We align our programme and targets with government policy, namely the UK Jet Zero strategy. We compare our carbon emissions to a 2019 baseline, because this is the most recent period in which LLA was operating at full capacity.

ANNUAL EMISSIONS TRENDS

Carbon emissions increased in 2022 from 2021, as aircraft movements and passenger numbers recovered following the end of COVID-19 travel restrictions. Our airport emissions (scope 1 and 2) were 6,417 tCO¬2¬e and our total emissions (scopes 1, 2 and 3) were 225,974 tCO2e.

Our emissions per passenger were 0.49kg CO2e/pax, significantly lower than 2021 and broadly in line with the emissions per passenger in 2019.

In 2022, we improved the methodology for carbon footprint reporting across several areas, going beyond current best practice. For example, we improved how we calculate emissions associated with aircraft during Cruise, Climb and Descent (CCD), and with purchased goods and services (supply chain emissions). Both form part of our partners' emissions (scope 3).

In this year's report, we have kept CCD and supply chain emissions separate from our total carbon footprint. This is so the data can be better compared to previous years', and so it is easier to see the relative importance of other emission sources. From 2023, we plan to integrate these new reported sources of emissions into our core total carbon emissions reporting.

We are part of ACI Europe's Airport Carbon Accreditation scheme, the only global certification programme for airports. We achieved our Level 3 "optimisation" accreditation, which involves engaging partners in reducing their carbon emissions. In the second half of 2022, we started work that will enable us to achieve ACA Level 4, the highest level available to airports without offsetting.

Our airport emissions (Scope 1 and 2)*

Scope 1   Scope 2   —— Numbers of Passengers   * Location-based emissions

Our airport emissions (Scopes 1, 2 and 3)*

Scope 1   Scope 2   Scope 3   —— Numbers of Passengers

* Location-based emissions
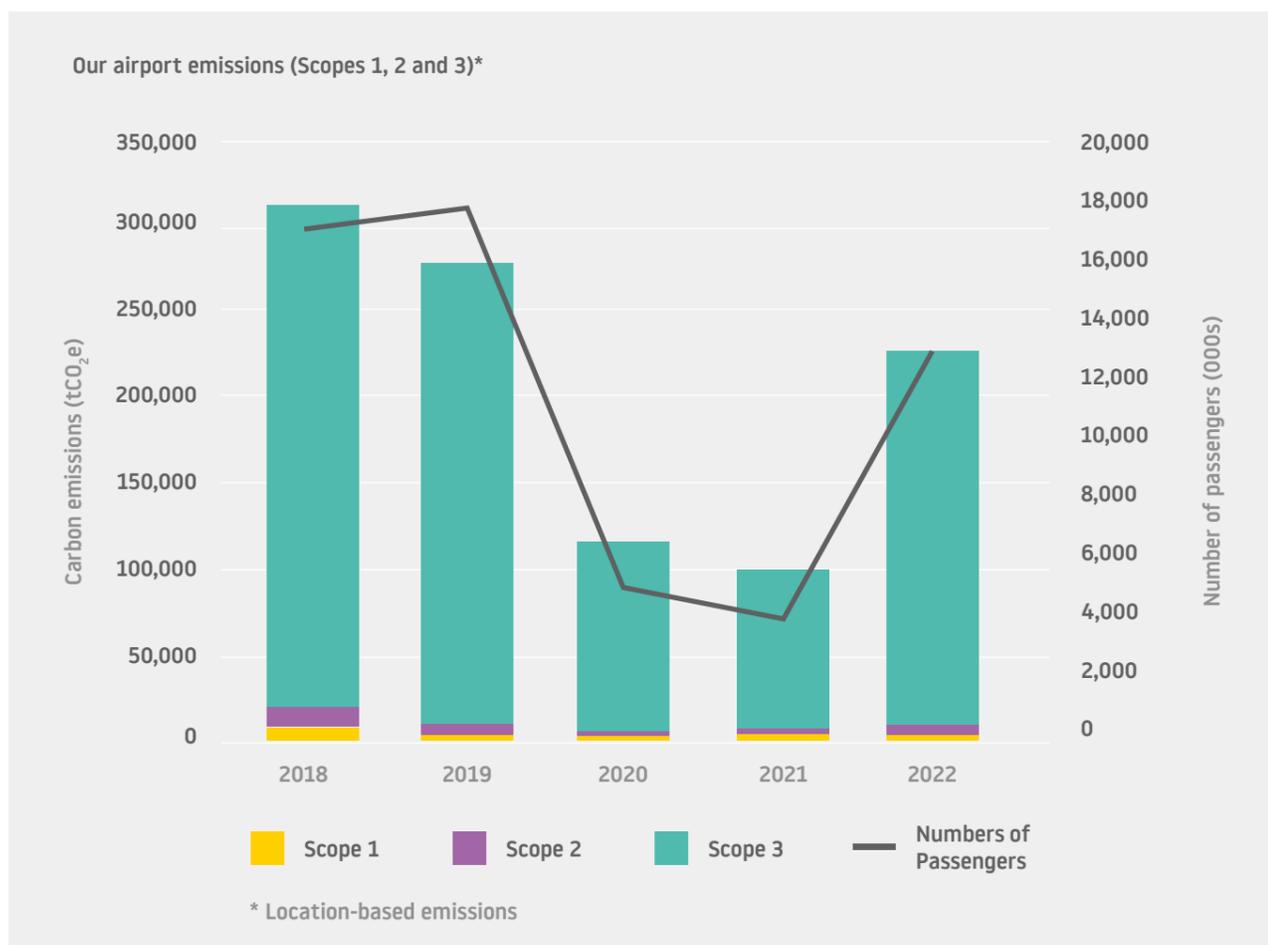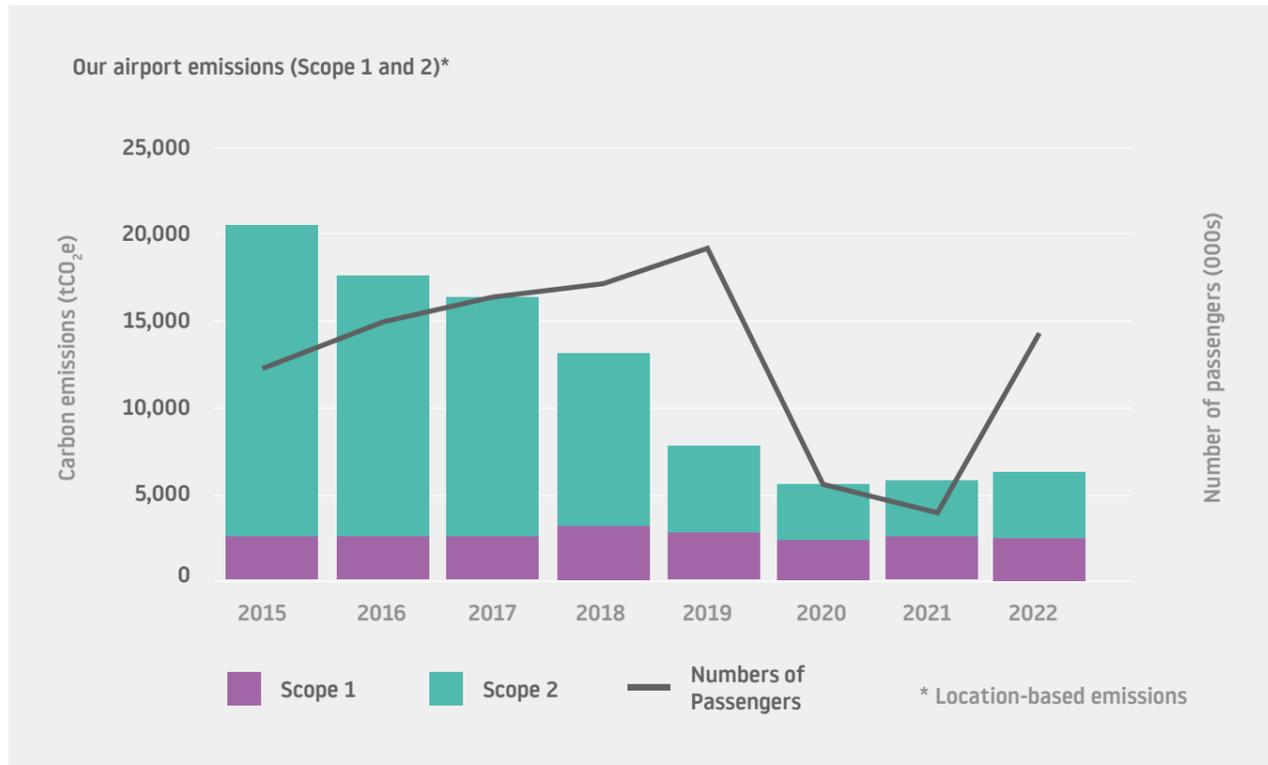
LOCATION-BASED

Emissions based on the emission intensity of the local grid area using national emissions factors

	2016	2017	2018	2019	2020	2021	2022
Scope 1 (tCO$_2$e)	2,917	2,899	3,189	2,965	2,325	2,299	2,372
Scope 2 (tCO$_2$e)	14,910	12,912	10,184	4,981	3,418	3,538	4,045
Aircraft Movements (tCO$_2$e)	-	-	137,603	146,329	66,789	59,372	115,162
Passenger Surface Access (tCO$_2$e)	-	-	152,286	131,923	41,859	29,857	94,176
Other (tCO$_2$e)***	-	-	2,622	10,201	6,565	7,518	11,780
Scope 3 (tCO$_2$e)*	-	-	292,511	288,453	115,213	96,747	221,118
Supply Chain Emissions** (tCO$_2$e)	-	-	-	-	-	-	13,550
Passengers (tCO$_2$e)	14,551,837	15,799,219	16,581,850	17,999,969	5,472,786	4,585,787	13,136,952
Emissions per million passengers (Scopes 1 and 2) (tCO$_2$e)	1,225	1,001	806	441	1,049	1,273	488
Emissions per million passengers (Scopes 1, 2 and 3) (tCO$_2$e)	1,225	1,001	18,447	16,467	22,101	22,370	17,320

MARKET-BASED

Emissions based on the electricity purchased by LLA, using contract-based or company-based emissions factors

	2016	2017	2018	2019	2020	2021	2022
Scope 1 (tCO$_2$e)	2,917	2,899	3,189	2,965	2,325	2,299	2,372
Scope 2 (tCO$_2$e)	14,910	12,912	13,690	6,772	5,095	1,332	-
Aircraft Movements (tCO$_2$e)	-	-	137,603	146,329	48,506	44,988	115,162
Passenger Surface Access (tCO$_2$e)	-	-	152,286	131,923	41,859	29,857	94,176
Other (tCO$_2$e)***	-	-	2,622	11,756	7,893	5,702	9,862
Scope 3 (tCO$_2$e)*	-	-	292,511	290,008	98,258	80,547	219,200
Supply Chain Emissions** (tCO$_2$e)	-	-	-	-	-	-	13,550
Passengers (tCO$_2$e)	14,551,837	15,799,219	16,581,850	17,999,969	5,472,786	4,585,787	13,136,952
Emissions per million passengers (Scopes 1 and 2) (tCO$_2$e)	1,225	1,001	1,018	541	1,356	792	181
Emissions per million passengers (Scopes 1, 2 and 3) (tCO$_2$e)	1,225	1,001	18,658	16,653	19,310	18,356	16,866

* Scope 3 emissions were not calculated in 2016 and 2017

** The boundary of scope 3 emissions has recently been extended by the GHG Protocol to include supply chain emissions. As such, in 2022 we did not include these emissions in the overall Scope 3 total but will from 2023 onwards.

*** The full breakdown of Scope 3 emissions is available in Appendix 17.

CARBON FOOTPRINT – SCOPE 3 EMISSION SOURCES

The chart shows our Scope 3 emissions sources.

In 2022, in line with new guidance, we also calculated the carbon emissions from aircraft Cruise, Climb & Descent (CCD) and from our supply chain.

These emissions sources are not included in our 2022 scope 3 emissions chart, but will be included from next year onwards.

Scope 3 emission sources

221,118 tCO$_2$e/year

97.1% of total emissions
Location Based Emissions Figures

- 52.9% Aviation fuel
- 42.6% Passenger surface access
- 1.8% Electricity
- 1% Diesel
- 0.9% Waste & material use
- 0.4% Staff commute
- 0.2% Gas oil
- 0.1% De-icer
- 0.05% Business travel
- 0.02% Water
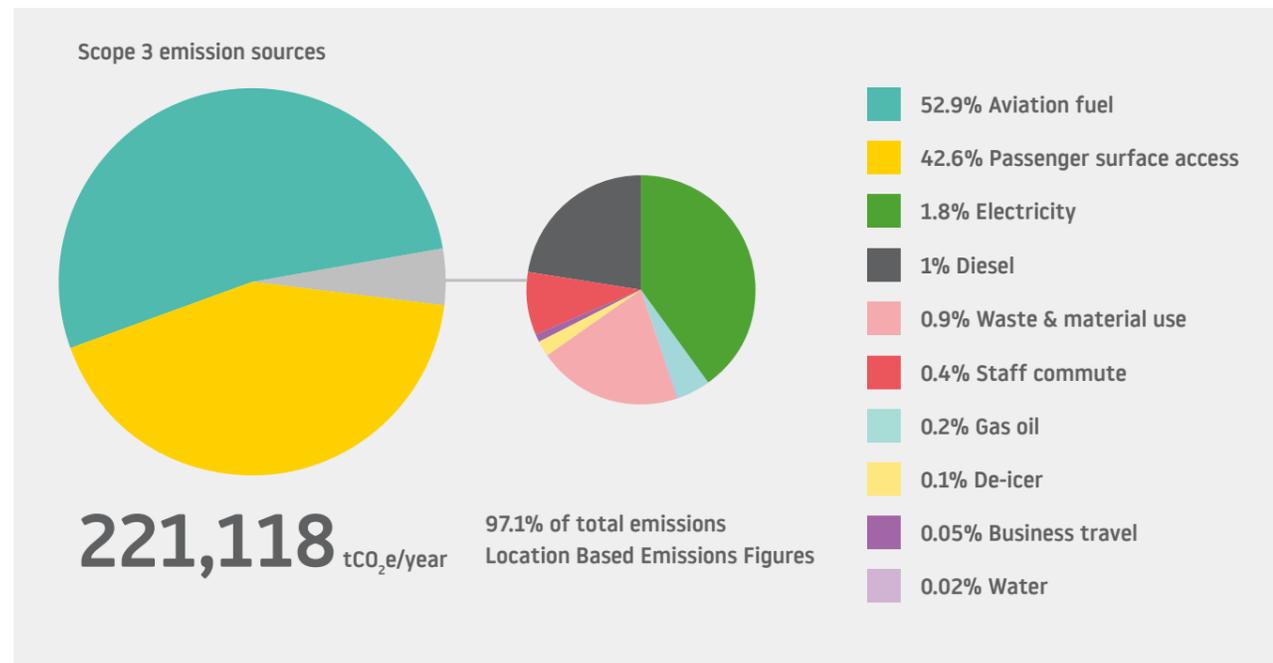
CCD EMISSIONS

For the first time, we were able to calculate carbon emissions from aircraft Cruise, Climb & Descent (CCD). If included in our footprint, CCD emissions would account for over 78% of our total emissions (838,325 tCO2e, scope 3). Although these aircraft emissions are outside our direct control, they are facilitated by the airport. We are working with airlines to reduce emissions from CCD as well as landing and take-off (LTO).

The other major aspect of our partners' emissions (scope 3) is passenger surface access. See p34 for how we are tackling this.

SUPPLY CHAIN EMISSIONS

Supply chain emissions are an important part of our overall carbon footprint, and we now have sufficient data for robust calculation. Recently, in line with the GHG Protocol Corporate Value Chain Accounting and Reporting Standard, and Carbon Disclosure Project standards, the boundary of scope 3 emissions has been extended to include supply chain emissions. This is required to set a science-based target for emissions reductions.

In 2022, LLA was responsible for 13,550 tCO2e from the following supply chain related emissions, which accounts for 1.3% of our partners' emissions (scope 3).

We are seeking ways to use procurement contracts to reduce these emissions, particularly through our Supply Chain Charter. More on this can be found in the Supply Chain section on p110.

Supply chain emissions

Source	Scope 3 Category	tCO2e	% of total
Purchased goods and services	1	5,612	41.4%
Capital goods	2	7,937	58.6%
Upstream transportation and distribution	4	1	0.0%
Total	**7**	**13,550**	**100%**

PROGRESS

In 2022, we published our Net Zero roadmap which sets out our short-term priorities:

1 Renewables

Over 60% of our emissions come from electricity consumption. To reduce these, we will generate:

25%

OF ELECTRICITY FROM ON-SITE RENEWABLE SOURCES BY THE END OF 2026

And continue to explore the feasibility of increasing on and off-site generation to 50%.

2 Airport Operations Vehicles

Our airport operations vehicles make up 15% of our emissions. To reduce these, we are working towards our aim to secure:

100%

LOW CARBON VEHICLES BY 2030

3 Heating

Gas constitutes 20% of our emissions. To reduce these, we will transition to:

LOW CARBON HEAT FROM 2030

PHASE OUT GAS USE BY 2039

4 Energy Efficiency

To reduce emissions from our existing operations as far as possible, we are:

INVESTING IN
ENERGY EFFICIENT
TECHNOLOGY

Throughout our buildings and infrastructure such as transition to: 100% LED lighting and optimising our building management systems and boiler efficiency.

5 Generators

Fuel use in generators contributes to around 1% of our emissions. To reduce carbon in the short-term, we will explore the use of:

LOW CARBON FUEL

FROM 2024

6 Residual Emissions

To tackle other airport emissions where there is currently no zero emission solution available, we will:

WORK WITH
THE WIDER INDUSTRY

to develop solutions to achieve Net Zero emissions.

OVERVIEW OF THE NET ZERO ROADMAP WE DEVELOPED IN 2022:

1. RENEWABLES

By 2026, we aim to generate 25% of electricity through the use of renewables. We have begun investing in a solar PV feasibility study to identify the best technologies and locations to help us achieve our target.

2. AIRPORT OPERATIONS VEHICLES

We want 100% of our vehicles to be low carbon by 2030. To achieve this, we will replace diesel with Hydrotreated Vegetable Oil (HVO), upgrade to electric wherever possible and install charging infrastructure for EVs.

We lease a fleet of six buses and will start specifying HVO fuel this year, moving to electric as the technology becomes more available, and aiming for a fully electric fleet by 2035 or sooner.

3. HEATING

We will use low carbon heat by 2030 and phase out gas by 2039. For now, we will focus on optimising our gas boilers to improve their efficiency, transitioning to electric sources of heat (most likely air source heat pumps) as soon as it becomes cost-effective. The use of natural gas comprises 55% of the airport's emissions (scope 1), which is 0.6% of total emissions.

4. ENERGY EFFICIENCY

We will invest in energy efficiency to reduce energy demand, while increasing energy resilience. Our 2022 audit identified opportunities for action, including replacing lighting with LEDs, improving building management systems and controls and optimising gas boilers.

5. LOW CARBON FUEL

We will use low carbon fuel in our generators from 2024. LLA has 11 back-up generators, four of which operate regularly. In the short-term, switching from diesel to HVO will lead to a 90% carbon reduction. Longer term, we will likely switch to hydrogen fuel cell generators to reach Net Zero airport emissions (scope 1 and 2) by 2040, after extensive testing and feasibility studies are conducted.

6. RESIDUAL EMISSIONS

We will work with our partners and the wider industry to bring carbon emissions to Net Zero by 2040, with a focus on finding ways to avoid the creation of carbon emissions, rather than relying on carbon removals (i.e. carbon offsetting).

We actively participate in industry groups and collaborate with our peers to shape policy and share good practice. We engage with government, particularly the Department for Transport, recognising the crucial role it can play in providing a supportive regulatory environment for rapid decarbonisation. We work closely with airlines that operate at LLA to influence their approach, as this is where the majority of our total emissions are generated.

MORE SUSTAINABLE AVIATION AT LLA

London Luton Airport has eight airlines that regularly operate flights: **easyJet**, **Wizz Air** and **Ryanair** are the largest. In 2022, these airlines were responsible for over half of all our partners' emissions (scope 3), excluding CCD emissions. We are working closely with these airlines to find ways to reduce emissions through operational and technological improvement, in particular the use of NextGen aircraft. See box on the right.

Although there are opportunities to decarbonise aircraft, such as hydrogen and electric technologies, they are not yet viable. It is essential we continue working with government and industry bodies to promote further research and development in areas that will have the most significant impact on emissions reduction.

The use of new, more efficient aircraft and sustainable aviation fuels are a critical short-term solution to reducing our partners' carbon emissions.

- 41% easyJet
- 41% Wizz Air
- 15% Ryanair
- 1% Blue Air
- 1% TUI group
- 1% EL AL
- <0% Other
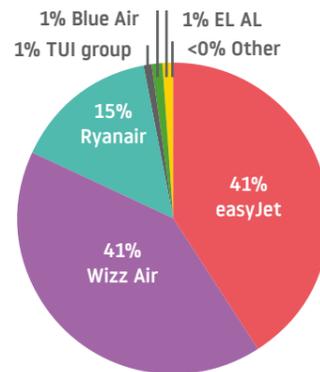
COLLABORATING WITH THE WIDER INDUSTRY

We are an active member of Sustainable Aviation (SA), a membership organisation with a long-term strategy to create a more sustainable aviation industry in the UK. SA comprises major UK airlines, airports, manufacturers, air navigation service providers and key business partners.

Our Head of Sustainability, David Vazquez, sits on the Cleaner panel, which coordinates work related to the SA goal to reduce net CO_2 emissions by 50% by 2050. This reduction must accommodate a doubling of demand and improvements to air quality around airports. In 2023, a roadmap will be launched by UK Government setting out how to achieve this goal. LLA will align our approach with this roadmap.

SUSTAINABLE AVIATION

SUSTAINABLE AVIATION FUELS

While hydrogen and electric technologies continue to advance, one of the most effective ways to reduce aircraft emissions is by using Sustainable Aviation Fuels (SAF) as an alternative to kerosene-based fuel (JetA-1).

In 2022, the UK Government committed to introduce a SAF mandate from 2025, requiring at least 10% of jet fuel to be made from sustainable feedstocks by 2030.

We are working with the government, airlines and industry to accelerate the viability of SAF as the main source of fuel for aircraft, including its economic viability.

WINGLETS AND SHARKLETS

Winglets or sharklets are curved extensions at an aircraft's wing tips. By decreasing drag and improving fuel efficiency, winglets can reduce carbon emissions by up to 6%. In 2022, 36% of all aircraft movements had either winglets or sharklets, saving around 800 tCO2e.

NEXTGEN FLEET: REDUCING EMISSIONS THROUGH MORE EFFICIENT AIRCRAFT

↑ **17%**
of all aircraft at LLA were NextGen in 2022

6,470 tCO2e
Saved through the use of NextGen aircraft

Summer 23 target
40%
of base aircraft to be NextGen

2025 ambition
50%
of all aircraft to be NextGen

Our airline partners can reduce carbon emissions by using newer, more efficient aircraft. We are working closely with our internal teams and airline operators to achieve noise and carbon reductions through NextGen aircraft.

Our goal is for 40% of aircraft to be NextGen by summer 2023, and for 50% by 2025. In 2019, 5% of all aircraft that operated from London Luton Airport were NextGen.

In 2022, we worked with airlines to increase the percentage of NextGen aircraft to 17% overall. This prevented 6,470 tCO2e being emitted, equivalent to almost all our scope 1 and 2 footprint.

These newer aircraft, which includes the Boeing 737-8 and the Airbus A320 Neo and A321 Neo, emit on average 25% less carbon per passenger mile than the current commercial models.

Original Model	tCO2e/ ATM	NextGen model	tCO2e/ ATM	% Saving
Airbus A320	1.14	Airbus A320 Neo	0.85	25%
Airbus A321	1.38	Airbus A321 Neo	0.99	28%
Boeing 737-8	1.18	Boeing 737 MAX	0.94	20%
Commercial Average	1.23	NextGen Average	0.92	25%

Energy

ENERGY MANAGEMENT APPROACH

Energy use is a major focus for our Responsible Business Strategy. Electricity is our largest energy source followed by gas and fuels, which together constitute most of our airport emissions (scope 1 and 2). Improving energy efficiency, moving to on-site renewables and transitioning to low carbon fuels will reduce costs, improve resilience and accelerate progress to Net Zero.

LLA's highest energy use areas are airfield ground lighting, heating and cooling systems, and our water pump systems. We also operate and maintain a high-voltage network on-site, and provide energy for our airline partners and on-site concessions, including shops, restaurants and private lounges.

To ensure we manage energy use carefully we operate an energy management system (EnMS). We achieved ISO 50001 certification for this system in 2014 and have maintained it ever since. We have an energy policy and a suite of processes and controls to help us drive energy efficiency, from procurement of equipment and designing systems and buildings, to employee training and ongoing maintenance activities.

As an airport, we face specific challenges when looking to improve energy efficiency. Operational requirements for safety critical systems, like runway lighting or emergency vehicles, make projects more complex and take longer. Furthermore, operating 24 hours a day makes it harder to transition to electric operational vehicles. We conduct detailed risk assessments for improvement projects to ensure we consider and manage all factors.

FOCUS IN 2023

Since 2021, we have been sourcing 100% electricity from Renewable Energy Guarantees of Origin (REGO) certificate. We will maintain this in 2023.

PROGRESS

In 2022, we conducted a detailed site-wide audit to identify potential energy efficiency opportunities as part of our Net Zero strategy. Taking into account the size of the potential energy, carbon and cost savings, and the age of the equipment, our energy reductions will focus on three key areas in the short-term:

▪ Replacing internal, car park and airfield lighting to LEDs

▪ Improving building management systems and controls

▪ Optimising existing boilers

We have developed an energy efficiency capital spending plan, which outlines phased investment from 2023 and beyond. The plan focuses on the most straightforward tasks first, including efficiency improvements, before moving onto more complex solutions. In 2023, we will expand this plan to consider further longer-term measures.

ENERGY PERFORMANCE

We used 41,966 MWh of energy in 2022. Energy use has increased year on year since 2020 as passenger numbers have recovered following COVID-19 travel restrictions, but consumption remains below pre-pandemic levels (2019: 49,982 MWh).

We saw our energy use per passenger continue its recovery to 2.34 kWh/pax, but with passenger numbers still more than a quarter lower than 2019, this metric remains slightly higher than pre-pandemic levels (2019: 2.02 kWh).

ENERGY USE AND EFFICIENCY

Energy use (MWh)	2015	2016	2017	2018	2019	2020	2021	2022
Electricity - airport use	37,568	36,186	36,727	35,975	19,488	14,661	16,665	20,920
Electricity - tenant use	-	-	-	-	16,920	11,609	10,415	9,918
Natural gas	10,324	9,794	8,748	9,110	8,495	7,337	8,147	7,161
Heating and power (gas oil)	556	605	764	769	693	474	742	744
Heating and power (biofuel)	-	-	-	-	-	-	552	-
Fuel (airport vehicles)	3,292	3,590	4,098	4,265	4,317	2,038	1,803	3,190
Fire training	-	-	-	-	69	17	28	33
Total	51,740	50,175	50,337	50,119	49,982	36,136	38,352	41,966
Passengers	12,279,176	14,551,837	15,799,219	16,581,850	17,999,969	5,472,786	4,585,787	13,136,952
Electricity use per passenger (kWh/pax)	3.06	2.49	2.32	2.17	2.02	4.80	5.90	2.34
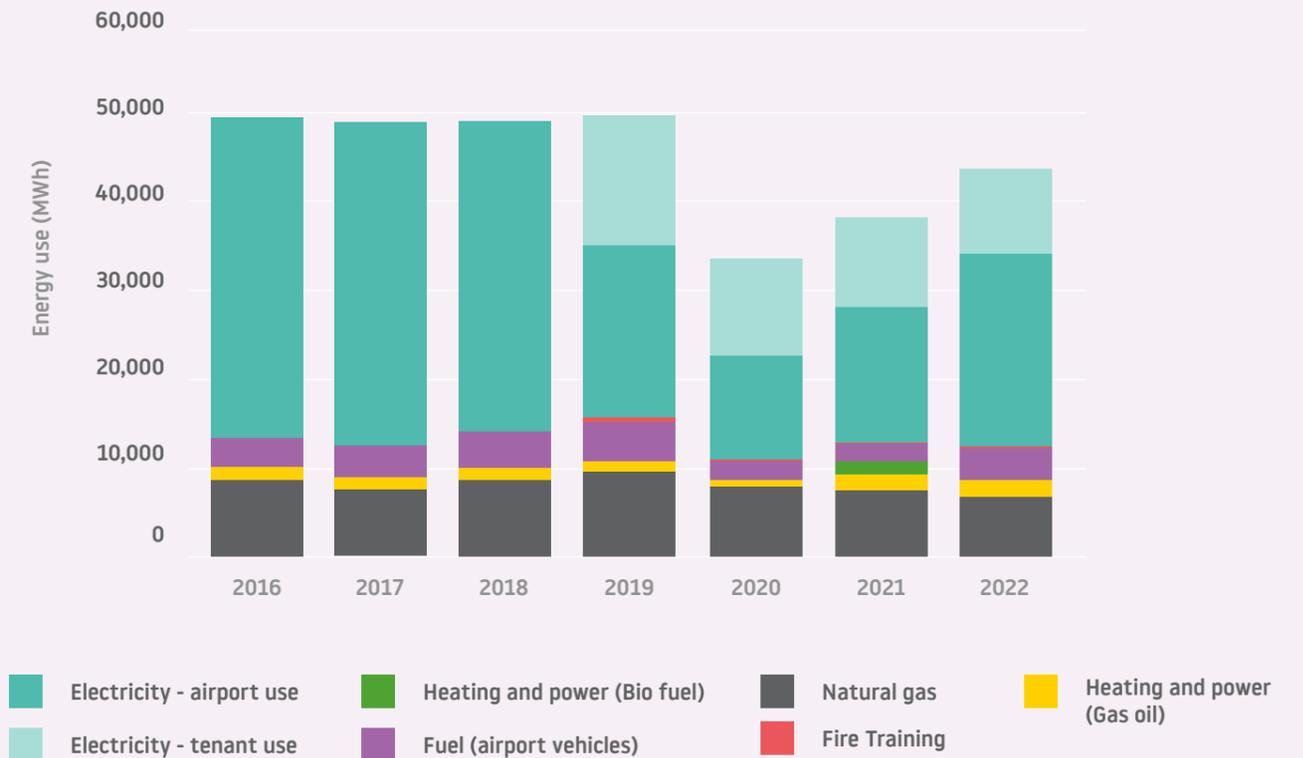
Climate change

## CLIMATE CHANGE MANAGEMENT APPROACH

In 2022, the Intergovernmental Panel on Climate Change (IPCC) released a report which contained specific recommendations for the aviation industry. It stated that profound changes are needed in the sector to meet climate goals, and that decarbonising the industry remains a major challenge.

Our approach is aligned with the UK Government's Jet Zero strategy. Commitments include ensuring that UK airports have Net Zero emissions by 2040, and a mandate for at least 10% Sustainable Aviation Fuel (SAF) usage by 2030. Carbon removals will also play a crucial role in addressing residual emissions.

The carbon section on p20 outlines the mitigation measures we are putting in place for our airport emissions (scope 1 and 2), and how we are working with our partners to reduce scope 3 emissions. Working with airlines, government and industry bodies will be essential to accelerate emissions reductions via lower-carbon biofuels or synthetic aviation fuels, which are not yet commercially viable.

Finally, we are working to understand and mitigate against the risks that climate change poses to our operations in the short to long term.

OUR TRAJECTORY TO NET ZERO

2019 – c. 8,000 tCO2e

•••• Without commitments
•••• With commitments
▆ Renewables
▆ Vehicles
▆ Heating
▆ Generators
▆ Energy efficiency
▨ Residual emissions

Covid 19

'000 OF TONNES OF CARBON (tCO2e)

2040 – c. 300 tCO2e

2019   2025   2030   2035   2040
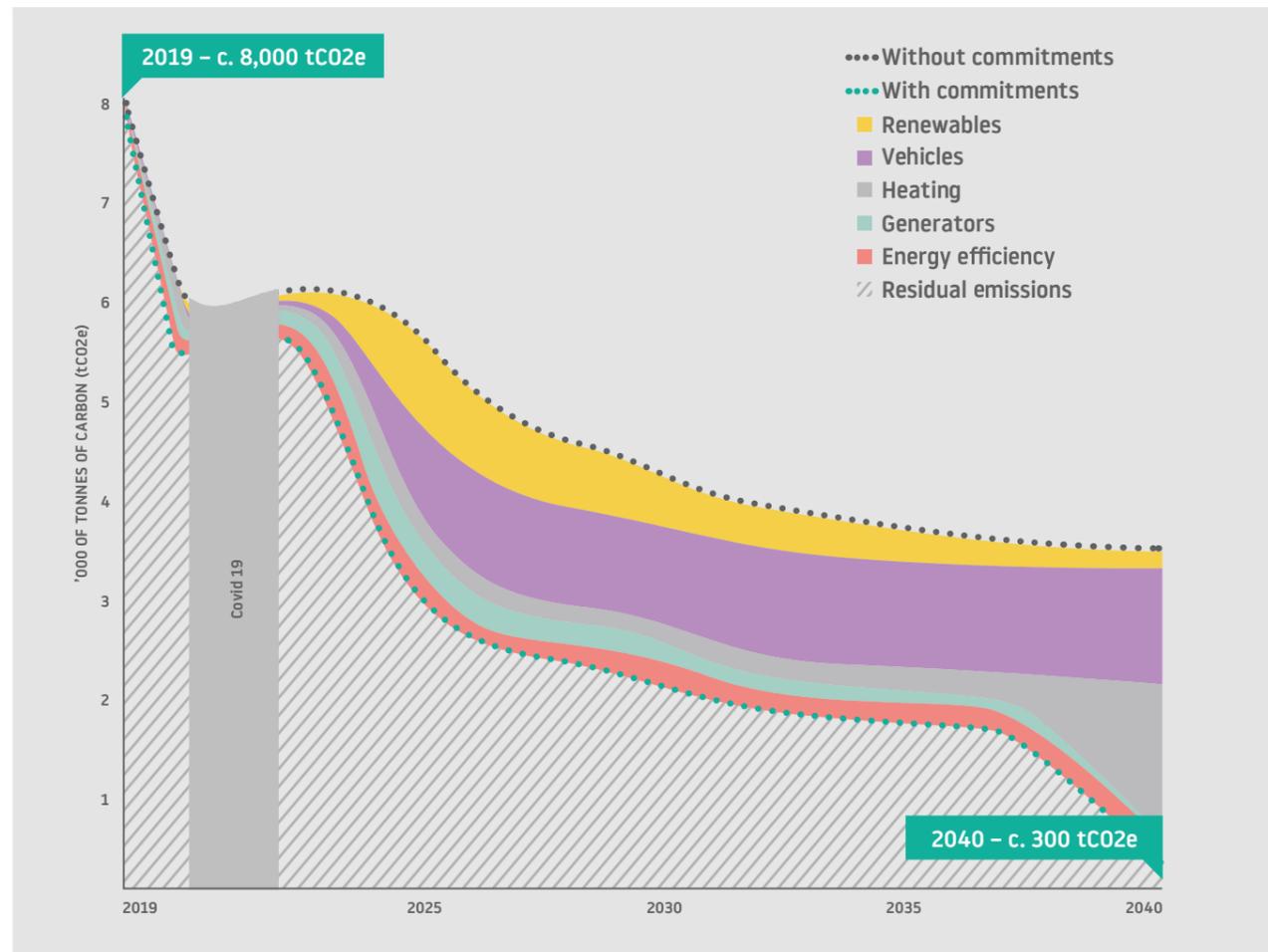
PROGRESS

NET ZERO ROADMAP

In 2022, our Net Zero roadmap to achieving Net Zero for our total emissions by 2040 was approved by our Sustainability Board Committee, which oversees implementation of the RBS. Our key focus areas include implementing on-site renewables, transitioning to low carbon vehicles, and phasing out the use of gas for heating – as well as working with airport partners to reduce scope 3 emissions (see p26).

We are committed to monitoring the progress and impacts of the UK Government's Jet Zero strategy on our business, and we plan to align with the upcoming government ambition for carbon-zero airport operations, and work with airlines to accelerate the use of Sustainable Aviation Fuels (SAF) to address our partner emissions (scope 3) (see p26).

CLIMATE RISK

In 2021, we analysed our exposure to climate-related risks and opportunities in line with DEFRA guidance and developed a climate change resilience plan which we continue to monitor through our Sustainability Committee.

One of the most important physical risks identified is the potential impact from more intense and frequent extreme weather events. These can disrupt our operations, as well as utilities and our supply chain. The review also identified potential noise impacts as higher temperatures make the air less dense, meaning aircraft need more thrust and longer distances to take off.

Transition risks include the impact of additional operating costs from carbon taxes or additional regulation, and the transition to alternative fuels or electricity for aviation. Consumer demand for air travel may reduce due to high taxation costs if sustainable aviation fuels are not implemented quickly enough.

The review also identified opportunities. These include lower energy costs from efficiency initiatives and competitive advantage from investing in sustainable aviation infrastructure, micro-grids and on-site renewable energy, all of which we are exploring.

NET ZERO 2040
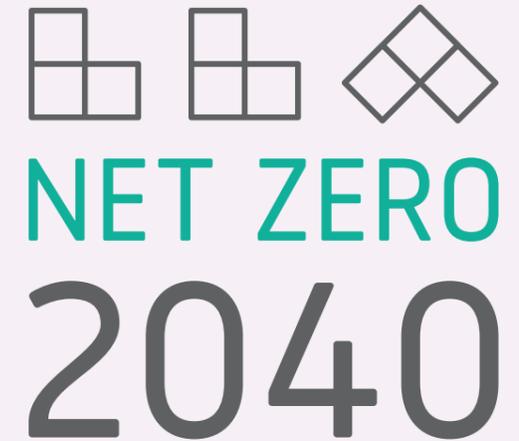
FOCUS IN 2023

Climate risk will be an important consideration as we prepare to develop our next sustainability strategy. In 2023 and 2024, we will work on the following areas to respond to the risks of the climate change:

▪ Align our reporting to the Taskforce on Climate Related Disclosures framework

▪ Continue to assess climate-related risk and the steps we can take to mitigate it

▪ Set actions and KPIs related to climate resilience

▪ Integrate climate risk into our existing policies, procedures and risk monitoring processes

▪ Share insights within industry forums, such as Sustainable Aviation, on how we are managing climate risk

Sustainable passenger surface access

A passenger's journey starts the moment they leave their home or workplace, and we want to make their whole trip more sustainable. We have set targets to reduce single car use and increase access to the airport via sustainable travel options, such as the new express rail services and the Direct Air-Rail Transit (DART) linking Luton Airport Parkway railway station and the terminal. We are also exploring how we can transition to more sustainable vehicles within our own operations.

OUR SUSTAINABLE TRAVEL APPROACH

As passenger surface access accounts for over 45% of our total carbon footprint, this is a core focus of our carbon reduction strategy. Our Responsible Business Strategy (RBS) includes three key targets that will be implemented through our Airport Surface Access Strategy (ASAS):

- Encouraging passengers to travel with more sustainable transport options to the airport, such as rail, bus and coach.

- Promoting sustainable surface transport options, such as encouraging employees to use car sharing and reviewing our fleet.

- Reducing the impact of surface access on our community by working with local authorities to shift passengers towards more sustainable transport options, increasing the number of bus bays, improving the proximity of coach and bus services, and installing digital totems and better signage.

In 2022, following the end of the COVID-19 restrictions, full bus and coach services were restored at the airport.

We are working to further push modal shift through use of our extensive public transport networt, making it easier and simpler than ever for passengers to access LLA.

A key tool in supporting a shift to more sustainable travel is the construction of the Direct Air-Rail Transit (DART), a dedicated cable-hauled fast passenger transit connection between the station and airport terminal, which will open in March 2023.

Case study

The Luton DART is an innovative passenger transit system, developed by the owner of LLA, Luton Rising, which will connect Luton Airport Parkway station with the airport terminal in 2023. Historically, poor access has been a major obstacle to increasing the number of passengers travelling by train.

Taking less than four minutes, the DART is fully automated and electrically powered and offers a fast and reliable connection to the terminal entrance. The new link will replace the bus shuttle, operating 24 hours a day and 7 days a week, delivering a significantly better passenger experience.

The Luton Express train service will run directly every half an hour from London St Pancras to Luton Airport Parkway, operated by East Midlands Rail. From 2023, passengers will be able to connect to the DART, making the total journey time approximately 30 minutes.

We have worked closely for several years with Luton Council, Luton Rising and Network Rail to bring this project to fruition. We expect the new service will help shift a significant amount of passenger traffic from road to rail, substantially reducing carbon emissions.
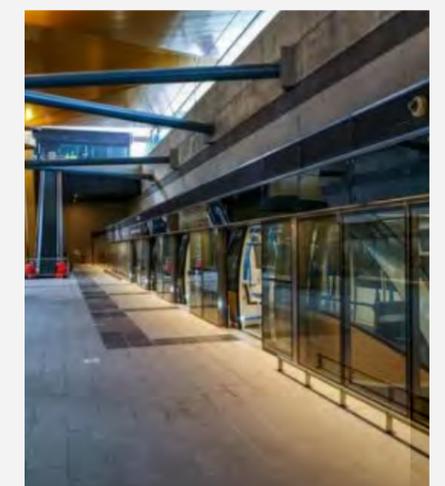
PROGRESS

DECARBONISING TAXIS

All Hackney Carriages (taxis that are not privately hired) that operate at the airport must meet Euro 6 emissions standard. This is the latest European emission standard aiming to reduce nitrogen oxide (NOx), carbon monoxide (CO), hydrocarbons (THC and NMHC) and particulate matter (PM) from diesel cars. The emissions standard also leads to improved fuel economy and lower CO2 emissions.

There are currently 114 taxis that serve the airport, of which 37 are now electric vehicles, up from 10 in 2021. This has reduced the overall price taxi users pay by 20-30%. Next, we will provide on-site charging points for taxis so we can achieve 100% EV Hackney Carriages in the next contract renewal.

MORE EFFICIENT COACHES

In 2022, we worked closely with coach providers to scale services back up to pre-pandemic levels. As a result, an increasing number of passengers are now choosing coach as their onward travel option, which emits far fewer carbon emissions than a private car or taxi.

The carbon emissions from passengers using coaches to travel to and from the airport in 2022 went down by 28% per movement compared to 2019 (with an average of 250 movements per day). This is because an increasing number of our coach providers are now using Ultra Low Emissions Zone compliant, Euro 6 engines. In future contracts, we are specifying Euro 6 engines only, as well as the use of HVO fuel, which will further reduce emissions and air pollution.

INCENTIVISING PASSENGER EV USE

We currently have 10 parking spaces designated for electric vehicles in our car parks. We lowered parking tariffs to incentivise use by airport passengers. In February 2022, 259 people used the units, up from 103 the previous year.

EMPLOYEE INCENTIVES

We have introduced a discount scheme on public transport to incentivise employees to use their cars less and are looking to introduce an electric vehicle scheme as part of our employee benefits package. We are also reducing the number of private parking spaces available to employees to discourage car use and promote more sustainable modes of travel.

SUSTAINABLE TRAVEL PERFORMANCE

Across 2020 and 2021, health concerns and travel restrictions had a considerable impact on travel choices for passengers and employees, with a shift from public transport to private cars. In 2022, we saw a significant increase in the percentage of passengers using sustainable modes of travel to get to and from the airport (2022: 34% 2021: 25%). Notably, there has been a significant increase in the proportion of passengers travelling to the airport by rail, owing to improved fast train access from central London.

Overall, 34% of passenger journeys were made via sustainable modes of travel, which remains slightly below our target of 36%.

We also recognise the importance of providing sustainable transportation options for our employees. In 2022, 21% of our employees used sustainable modes of transportation to access the airport which falls short of our target to reach 28% by 2022. Our progress has been affected by the pandemic, and we intend to increase this number, setting a new target beyond 2022.

"I look after the Airport Surface Access Strategy. I work with airlines and partners across the airport to improve sustainable travel to and from the airport."

— Graham Sweedy, Operations Manager

Staff mode	2010	2012	2014	2016	2018	2020	2022
Drive alone (%)	66	66	62	68	59	78	75
Car share (%)	12	6	11	7	8	1	1
Taxi (%)	1	1	0	1	1	2	1
Motorcycle (%)	1	1	1	1	1	5	1
Rail (%)	5	5	10	7	8	2	6
Bus/Coach (%)	7	9	8	9	16	3	10
Cycle (%)	2	2	2	2	2	3	2
Walk (%)	5	6	7	5	5	6	3
Sustainable (%)	19	22	27	23	31	14	21

Passenger mode	2012	2013	2014	2015	2016	2017	2018	2019	2020*	2021**	2022
Drop off (%)	27	28	25	27	28	43	45	45	56	57	44
Car park (%)	23	23	28	27	23	20	17	16	31	16	17
Rail (%)	17	16	14	16	16	17	17	21	6	17	23
Bus/Coach (%)	16	16	15	15	16	16	16	17	3	8	12
Sustainable (%)	33	32	29	31	32	33	33	38	9	25	34

* Q1 results only, unweighted and with heavy COVID-19 impact

** CAA Snapback Survey 2021 - unweighted

PASSENGER SURFACE ACCESS
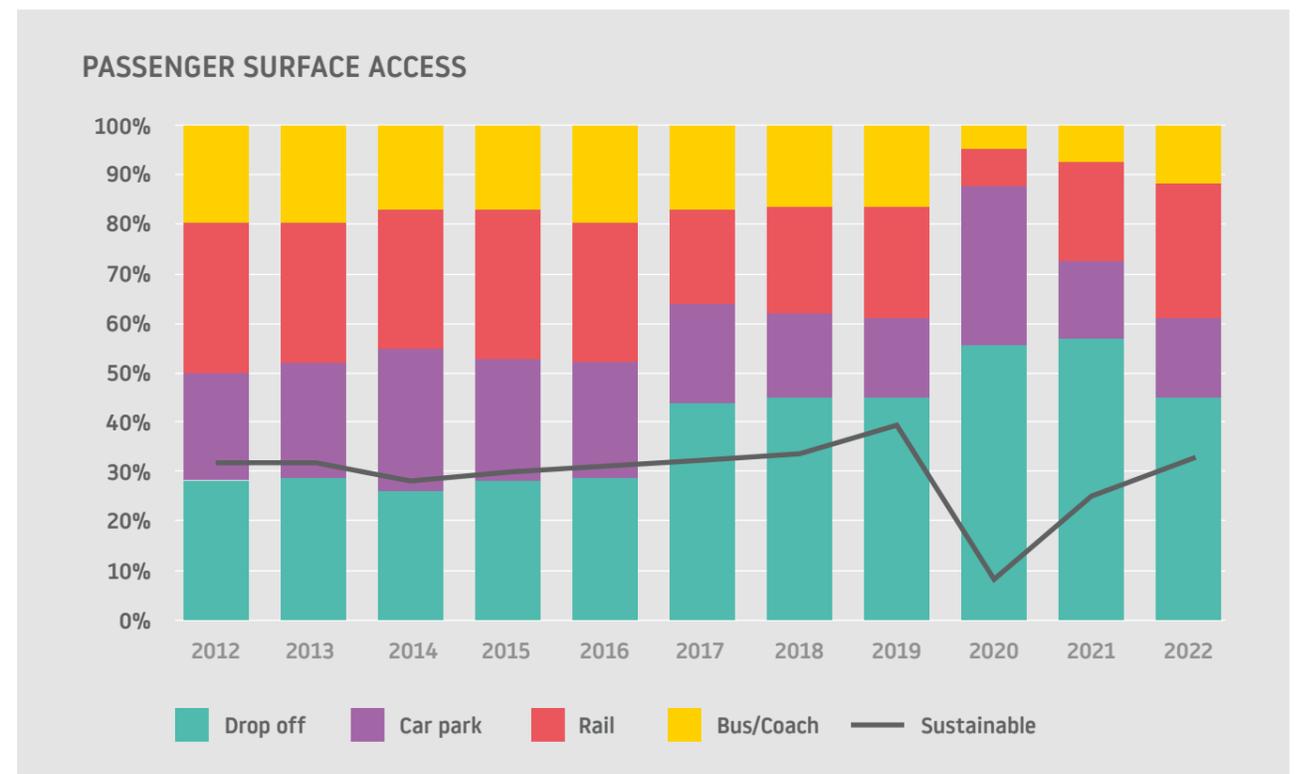
Waste

We aim to reduce the waste we produce per passenger and continue increasing recycling rates. We have set ambitious targets for our operational and construction waste and aim to achieve the Carbon Trust Standard for Zero Waste to Landfill Accreditation.

OUR WASTE MANAGEMENT APPROACH

As an airport operator, we segregate and manage all waste on-site, except airline waste. This includes waste from the terminal, concessions (including shops and restaurants), airside operations, maintenance and construction, and our administrative operations.

We have set targets to reduce the waste produced per passenger to less than 0.12kg per passenger by the end of 2023, to recycle at least 70% of our waste by the end of 2022, to achieve the Carbon Trust Standard for Zero Waste to Landfill certification, and to ensure that less than 5% of non-hazardous construction waste goes to landfill. We operate segregated waste streams across the airport, with specialist waste contractors in place to ensure waste is managed in line with legislation.

Since 2016, we have engaged with teams and partners across the airport to implement better waste segregation and management practices, with a particular focus on reducing single-use plastics.

WASTE PERFORMANCE

In 2021, we appointed a new waste contractor to make progress towards our target of recycling at least 70% of our waste. This saw us introduce enhanced waste management processes as part of the 'zero to landfill' contract, including on-site and off-site waste segregation and a greater number of waste operatives.

In 2022, we generated 1,640 tonnes of waste. This is an increase of 174% since 2021 (599 tonnes) due to the growth in passenger numbers following COVID-19 However, the waste per passenger rate in 2022 was 0.125 kg per passenger, around 5% lower than in 2021 and close to our target of 0.12 kg per passenger.

In 2022, no waste went to landfill – it was either recycled, composted (food waste and coffee), or sent for combustion, with the energy recovered.

During 2022, we engaged with our concessionaires and on-site partners and reported waste and recycling rates monthly to the board. The overall recycling rate for 2022 was around 60%, which is behind our target. However, the rate increased over the course of the year – we achieved 71% during November 2022 – and we expect to see improvements in 2023 as we introduce initiatives for employees and airport workers in collaboration with our concessionaires.

| Year	2016	2017	2018	2019	2020	2021	2022
Recycled waste (tonnes)	690	1,459	1,430	1,493	426	370	974
Non-recycled waste (tonnes)	1,292	868	809	999	446	229	655
Total waste (tonnes)	1,982	2,327	2,239	2,492	872	599	1,640
Recycling rate	35%	63%	64%	60%	49%	62%	59%
Waste per passenger (kg)	0.136	0.147	0.135	0.138	0.159	0.131	0.125
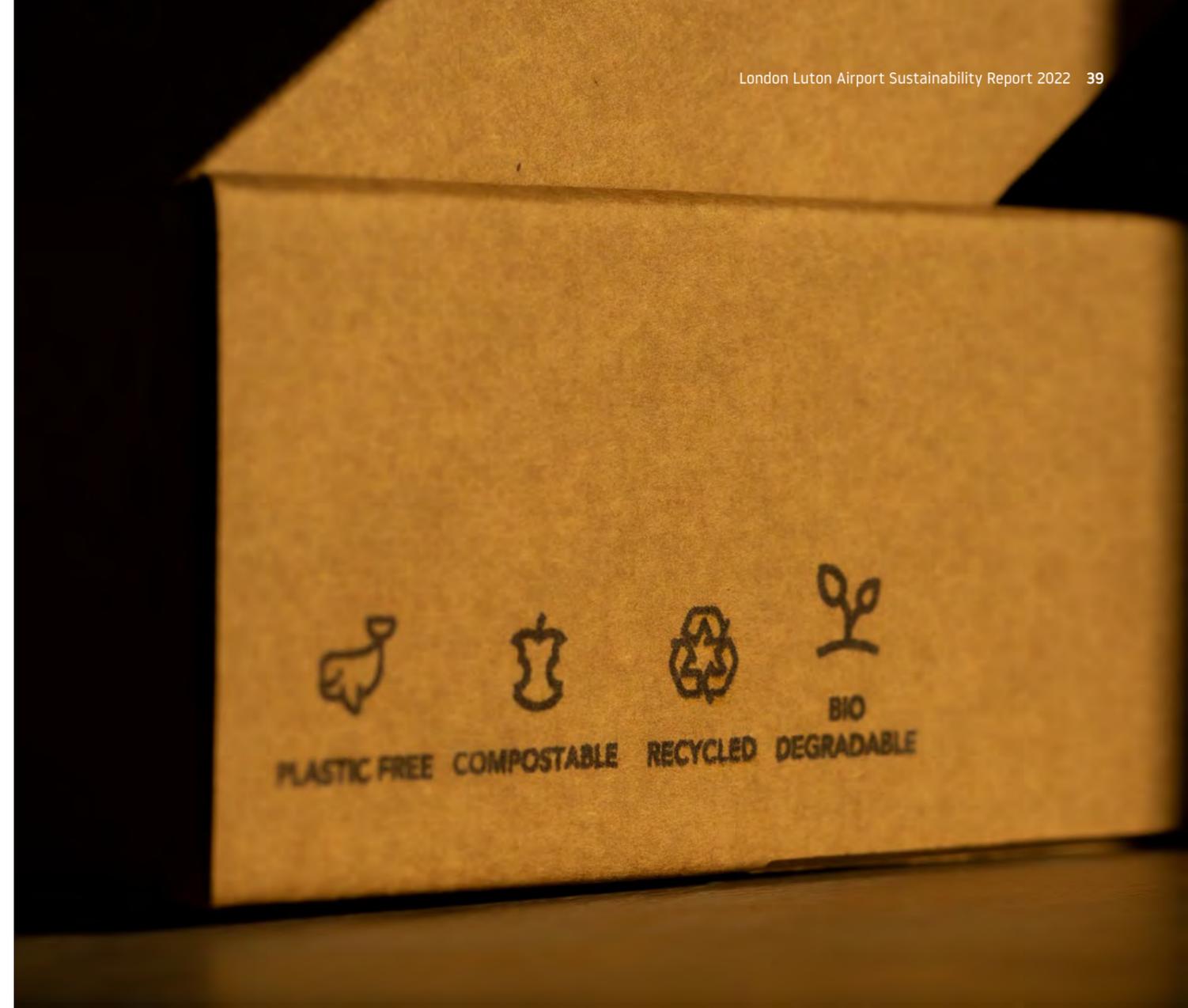
Single -use plastics

We will work with all our on-site partners to reduce single-use plastics, and we will include a requirement in all new contracts to avoid their use.

OUR APPROACH

We aim to eliminate single-use plastic from the airport and as of 2022, all concession agreements contain single-use plastic reduction clauses, in accordance with our RBS target. We continue to work within the business, as well as with our supply chain and concessions to identify further opportunities to reduce single-use plastic.

Our total plastic waste in 2022 was 17.48 tonnes. All of this was successfully recycled, with no plastic waste making it to landfill or combustion.

Water

We aim to reduce our water use per passenger and explore where we can use non-potable water across the airport.

OUR WATER MANAGEMENT APPROACH

Water is mostly used on-site for terminal facilities including toilets, cooking and drinking, as well as in hotels and airplane hangars. Some water is used for landscaping and construction, road sweeping and by the fire station, particularly for fire service training.

We work in partnership with a third-party contractor to manage our water use. Using data from our growing number of water meters across the airport, we have identified opportunities to fix leaks and reduce water use. We have low-flow taps and water saving dual-flushes across the airport, and we include water management initiatives as part of our ISO 14001 environmental management system.

WATER USE PERFORMANCE

Water use in 2022 was 109.4 million litres, an increase on 2021 usage (48.2 million litres) due to the growth in passenger numbers. Concurrently, our water use per passenger decreased significantly to 8.33 litres per passenger, down from 10.32 litres per passenger the previous year.

We acknowledge that work remains, as water use per passenger remains higher than pre-pandemic levels, as shown in the chart opposite.

PROGRESS

We have been working closely with manufacturers and our construction partners to identify innovative solutions for improving water efficiency. In 2022, we began installing new water efficient toilets and we expect all toilets in the terminal to have the latest technology by the end of 2023.

We had planned to identify and analyse opportunities to replace potable water with non-potable water, such as for vehicle cleaning or toilet flushing. This project is currently on hold due to COVID-19-related resource constraints. In 2023/24, we will work on our Water Management Strategy and begin developing our Surface Water Strategy in line with our climate adaptation development. This will allow us to identify new water saving opportunities and will be vital for us reaching our RBS targets.

Year	2018	2019	2020	2021	2022
Water use (litres)	126,792,000	133,334,000	52,693,000	48,200,000	109,395,000
Water use per pax (litres/pax)	7.67	7.41	9.63	10.32	8.33
2023 RBS target	6.98	6.98	6.98	6.98	6.98

Air quality

Air quality has always been an important issue for us. We have had management and monitoring controls in place in and around the airport since 2003. In 2022, we published a new Air Quality Strategy to drive further improvements.

AIR QUALITY MANAGEMENT APPROACH

Emissions from road vehicles and aircraft have a negative impact on air quality because they release nitrogen dioxide (NO_2) and particulate matter ($PM10$ and $PM2.5$). Across the airport, areas with heavy vehicle traffic, such as the coach terminal, access roads and runway apron, are likely to have lower air quality.

We have a number of controls to manage and monitor air pollution on site. We include air quality considerations for tenders for on-site vehicles, have introduced reduced parking tariffs for EVs, and operate no-idling rules for coaches and deliveries, with penalty charges for non-compliance.

We use diffusion tubes to monitor air quality at 19 locations across the airport. Monitoring locations are classified in four groups: access roads, runway and flightpath, airfield, car park and drop-off zones. Since 2003, there has been automatic continuous monitoring of particulate matter (NO_2) using an EU reference equivalent monitor. In addition, indicative monitoring of nitrogen dioxide (NO_2) was performed at 19 sites in 2022, using diffusive samplers.

PROGRESS

In 2022, we developed an Air Quality Strategy to further enhance the airport's local air quality performance. The strategy is focused on improved monitoring and delivering emissions reductions from airport-related traffic and aircraft. During the year, we included new incentives in commercial agreements with airlines to encourage the use of new generation aircraft, and we kicked off a process to move to low emissions cars, buses and other vehicles through our surface access strategy.

One of the challenges we face is differentiating airport emissions from traffic emissions around the airport - we are close to the M1 motorway. Our new strategy will look at how we can do this to better understand our direct contribution.

AIR QUALITY PERFORMANCE

During 2022, particulate concentrations increased in-line with increased passenger numbers, from 12 µg/m3 to 15 µg/m3. This remains below the World Health Organisation's recommendation of an annual concentration of 20 µg/m3 and a 24-hour average of 50 µg/m³ and the airport's permitted threshold of 40 µg/m³. Particulate concentrations remain lower than pre-pandemic levels from 2019.

Our annual mean NO_2 ranged from 7.1 to 37.2 µg m-3 after bias correction, with monitoring performed at 19 sites during 2022. Although concentrations did increase from 2021 levels, this is likely due to the return of passengers because concentrations remain lower than the pre-pandemic levels measured in 2019. None of the sites recorded NO_2 concentrations above the objective of 40 µg m-3, continuing our success of no NO_2 exceedances for three consecutive years. Further information regarding our NO_2 monitoring can be found in the Appendix.

Chart: PM_{10} concentration (µm³) vs year (2013–2022)

Legend: —— PM_{10} concentration (µg m⁻³) ---- PM_{10} annual objective
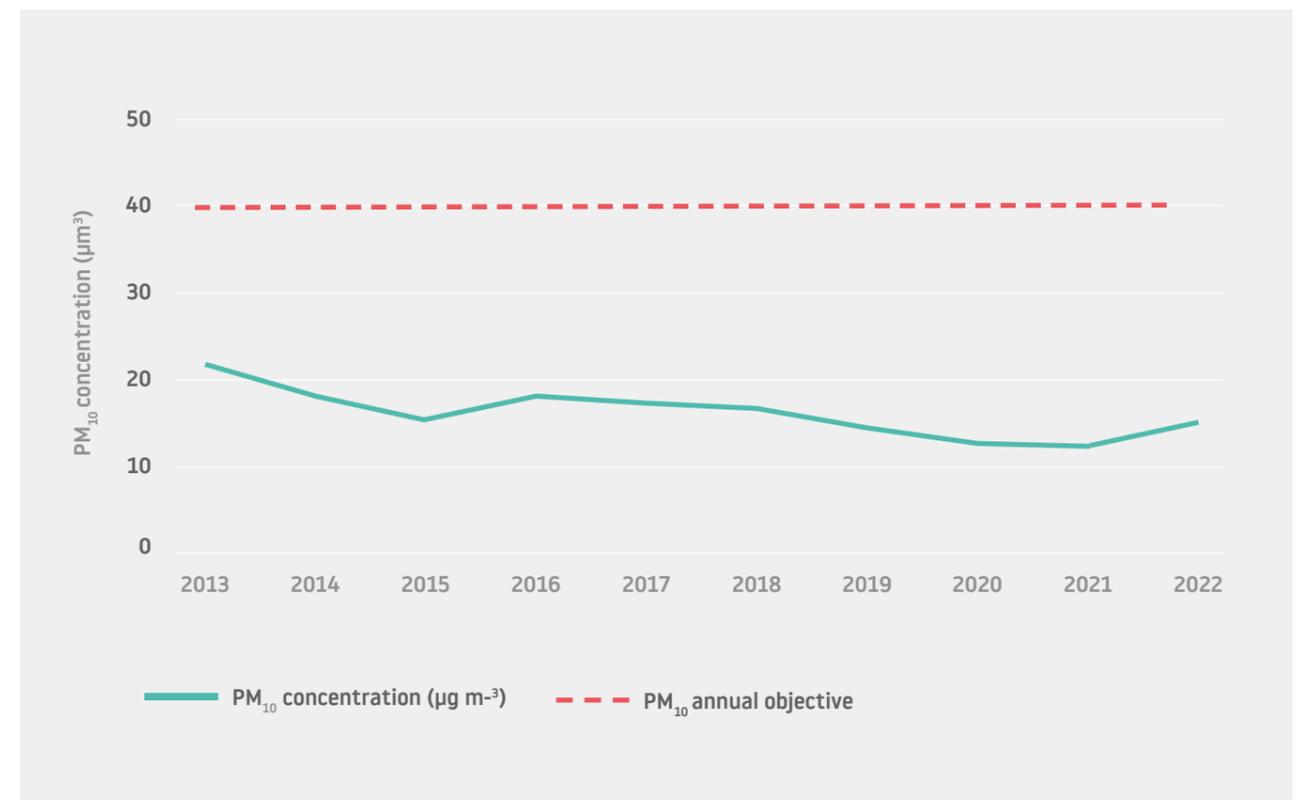
Noise

Responsible growth requires proactive management of all our environmental impacts. Noise can impact the quality of life for people and wildlife living under flight paths. We work with airline partners to phase out noisier aircraft and explore operational changes to reduce noise. We also engage with our community on ways to improve our noise management and noise complaints practices, as well as making the strongest possible representations to government for the need to modernise the UK's airspace.

OUR NOISE MANAGEMENT APPROACH

We work hard to reduce the impact of the airport's noise, with dedicated targets in our Responsible Business Strategy. Our Flight Operations Team launched our five-year Noise Action Plan in 2019, with five priority areas, which are aligned with the International Civil Aviation Organisation's balanced approach:

1 IMPROVING OPERATIONAL PROCEDURES

2 QUIETER AIRCRAFT

3 OPERATIONAL RESTRICTIONS

4 LAND USE PLANNING AND MITIGATION

5 WORKING WITH THE LOCAL COMMUNITY AND INDUSTRY PARTNERS

6 NOISE PERFORMANCE AND COMPLAINTS

1 IMPROVING OPERATIONAL PROCEDURES

We monitor adherence to noise procedures through our Aircraft Noise and Track System. This captures flight information for aircraft operating within a 25-mile radius of the airport and generally up to an altitude of 12,000ft. The public can access this system from our website. The system receives data from our fixed and portable noise monitoring terminals, located within the neighbouring communities. This enables us to:

▪ Identify noise infringements and impose penalties where relevant.

▪ Monitor track-keeping and work with operators to improve performance.

▪ Monitor noise in all our local communities.

▪ Investigate complaints of disturbance and enquiries.

To the right are the two maps which show indicative flight routes for westerly and easterly operations at LLA with detailed information about each departure route.

PLAN SHOWING EASTERLY (07) FLIGHT ROUTES

07 Olney	
Average daily departures	6.3
Percentage of all departures	4%
Annual departures (daytime)	2,078
Annual departures (night time)	247

07 Compton	
Average daily departures	16.8
Percentage of all departures	10%
Annual departures (daytime)	5,419
Annual departures (night time)	718

07 Match	
Average daily departures	25.3
Percentage of all departures	16%
Annual departures (daytime)	7,944
Annual departures (night time)	1,316

PLAN SHOWING WESTERLY (27) FLIGHT ROUTES

25 Olney	
Average daily departures	14.8
Percentage of all departures	9%
Annual departures (daytime)	4,864
Annual departures (night time)	542

25 Match	
Average daily departures	57.3
Percentage of all departures	35%
Annual departures (daytime)	18,182
Annual departures (night time)	2,741

| 25 Compton	
Average daily departures	39.2
Percentage of all departures	24%
Annual departures (daytime)	12,841
Annual departures (night time)	1,497

5 WORKING WITH THE LOCAL COMMUNITY AND INDUSTRY PARTNERS

We investigate all concerns related to aircraft activity. Information on how to contact us can be found on our website and complaints can be submitted via telephone, email or our online flight tracking system (TraVis). Complaint statistics for 2022 can be seen in the graph below, and further detailed information is within Appendix 4.

We also meet with a Consultative Committee, which provides a formal mechanism for the airport to engage with members of the community. The committee meets on a quarterly basis and includes representatives from the local authority, community groups, airport users and other stakeholder groups.

In 2022, we held five community noise surgeries involving approximately 100 people in total. These were held in Potton, Streatley, Harpenden, Abbotsley and Kensworth. Although all areas had different concerns, common themes included the arrivals airspace change (AD6) and night-time noise.

We had planned to complete a noise survey during 2021, but the decrease in aircraft movements because of the COVID-19 pandemic would not have created a representative view of noise impacts. We will complete the survey before the end of 2023.

2 QUIETER AIRCRAFT

We operate a noise quota count system during the night, with each aircraft allocated a value based on the certified noise they may produce. We do not allow aircraft with a quota count of two or more to operate at night. Our quota count limit sets a noise budget that cannot be exceeded. In 2022, the airport used 2,848 of its 3,500 night quota. This limit will reduce from 3,500 to 2,800 by 2028. The annual breakdown of QC use by month is available to view in Appendix 7.

3 OPERATIONAL RESTRICTIONS

There is a rolling limit to the number of aircraft movements permitted during the night and early morning. Night-time aircraft movements (between 23:30 and 06:00) are limited to 9,650 in any 12-month period. The limit for early morning movements is 7,000. In 2022, there were 9,157 night movements and 4,666 early morning movements. The annual breakdown of movements by month is available to view in Appendix 7.

We have set targets to phase out louder aircraft from the airport, with no Chapter 3 aircraft to operate after 2020 and 100% of aircraft to be Chapter 4 or better by 2022. In 2022, we missed these targets: just under 7% of aircraft movements were Chapter 3, while 93% were Chapter 4 or better. The breakdown of Chapters is available in Appendix 1.

4 LAND USE PLANNING AND MITIGATION

Together with an independent noise analyst and our London Luton Airport Consultative Committee (LLACC) Noise Insulation Sub-Committee, we offer noise insulation to eligible properties. Our Noise Contours (which map areas of noise exposure on the ground) determine the eligible properties each year. The scheme covers both residential and non-residential properties in Bedfordshire and Hertfordshire.

Depending on any existing insulation in the property, double glazing, secondary glazing and ventilation units can be provided. Rooms eligible for insulation include living rooms, dining rooms, kitchen-diners and bedrooms.

ANNUAL COMPLAINTS

Bar chart titled "Annual Complaints" showing total number of complaints/complainants by month (2022). Y-axis ranges from 0 to 3000. Categories: Total complaints (teal) and Number of complainants (purple).

OUR NOISE MANAGEMENT INITIATIVES

OFF-TRACK VIOLATION SCHEME

To limit noise impact for our communities, departing aircraft are required to follow specific paths called Noise Preferential Routes (NPRs). Aircraft flying outside of this corridor are off-track and may be subject to a penalty, which is paid into the airport's Community Trust Fund. The number of off-track violations by month and aircraft type is listed in Appendix 2.

NOISE VIOLATION SCHEME AND LANDING CHARGES

We have set daytime and night-time noise limits for departing aircraft. In 2020, we reduced these limits to 80dB(A) during the day and 79dB(A) at night. Any aircraft exceeding these limits will be fined, with all fines going to the Community Trust Fund. To avoid noise at night, which is often perceived as louder and more disruptive, we charge a higher landing fee for night arrivals. The number of day and night noise violations can be found by month in Appendix 2.

DELAYED LANDING GEAR

When an aircraft's landing gear is deployed, the air disturbance it creates causes noise and extra drag. Delaying landing gear deployment reduces aircraft noise by up to 50% for communities between five and seven nautical miles from the runway.

AIRSPACE MODERNISATION

The UK's airspace modernisation strategy will allow greater control and precision for aircraft routing, allowing aircraft to fly optimised routes. It will also allow the use of precision satellite navigation and electronic surveillance systems to redesign terminal routes and improve safety. LLA is using this opportunity to identify the most environmentally efficient way of managing our airspace, focusing on reducing the noise impact associated with aircraft operations.

ARRIVALS AIRSPACE CHANGE

In 2022, LLA implemented an airspace change to our arrivals routes, this was known as AD6. The proposal was co-sponsored with NATS (air traffic control services provider). The aim of this airspace change was to separate LLA's arrival routes from Stansted's. The new routes were consulted upon between October 2020 and February 2021. The airspace change proposal was submitted to the Civil Aviation Authority (CAA) in June 2021, and approval was granted in November 2021.

There is a seven-stage process for changing airspace. The final stage is a post-implementation review (PIR) which lasts for 12 months after implementation. During this period, LLA and NATS collect data on complaints, tracks and altitude of aircraft for this route. This data is shared with the CAA, which then decides if the new route can be made permanent or if changes are required. More information can be found on the CAA airspace change portal.

"I oversee all aspects of flight operations at the airport. My team is responsible for managing the impacts of aircraft on people, particularly noise, and the work we've been doing to modernise the airspace for the airport."

— Nicole Prior, Head of Flight Operations

"We are clear that sustainability needs to be at the heart of all operational investment decisions. A key focus for 2022 was figuring out how to accommodate solar power generation within the airport grounds, along with substantial investment in highly energy-efficient lighting and testing new ways to reduce aircraft-related noise."

— Neil Thompson, Director of Operations

### FUTURE AIRSPACE STRATEGY IMPLEMENTATION SOUTH PROGRAMME

As part of a national airspace change programme, as detailed in the CAA's Airspace Modernisation Strategy, LLA is required to update all its arrival and departure procedures in a move towards satellite based technology. The programme is known as Future Airspace Strategy Implementation South (FASI-S) and involves many airports and NATS.

FASI-S is co-ordinated by the Airspace Change Organisation Group (ACOG). Each airport is responsible for its own designs and for integrating these routes with other airports and upper airspace.

CONTINUOUS DESCENT APPROACH

We continue to promote the use of the Continuous Descent Approach (CDA) to mitigate noise disruption caused by aircraft approaching the airfield. Unlike traditional approaches that require the aircraft to descend in steps using engine thrust, CDA keeps the aircraft at a higher altitude for a longer period, gradually descending to the runway threshold. This approach reduces the time spent flying at lower altitudes, resulting in lower fuel consumption, fewer emissions, and less noise at ground level.

In 2022, we met our overall target of 92% of CDA compliant approaches, with most of our major operators achieving even higher performance levels. Compliance was 92% during daytime and 91% during night-time. The breakdown of the CDA compliance by operator is listed in Appendix 3.

CDA

"Conventional"

Extended low level segment

Establish on the ILS[2]
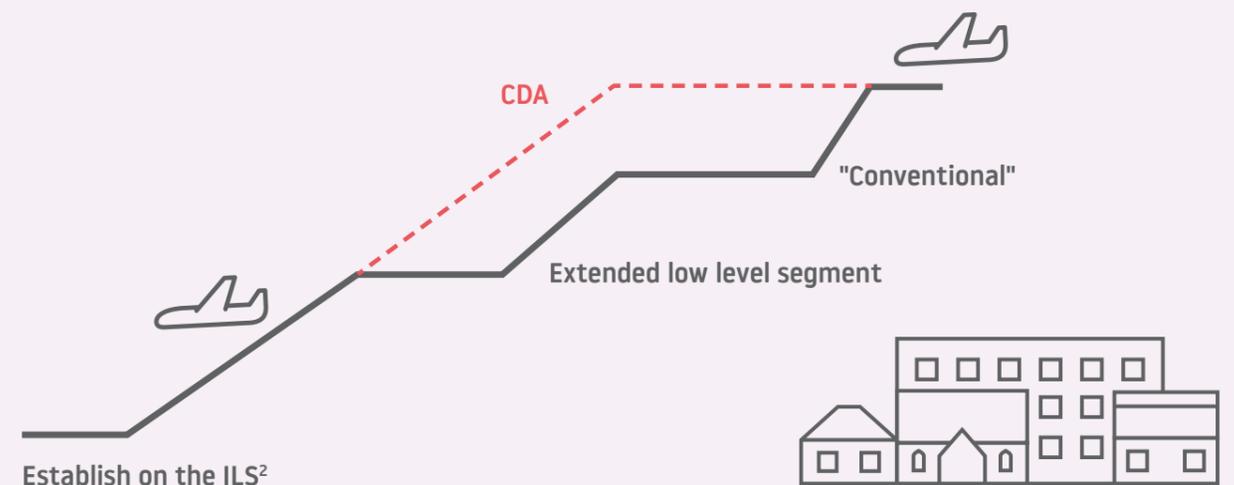
6. NOISE PERFORMANCE AND COMPLAINTS

There were 118k aircraft movements in 2022, nearly double the number in 2021. There was a corresponding increase in track violations, with 48 during the year (2021: 23). Airlines paid fines totalling £60,000.

There were six daytime departure noise violations in 2021 from a single private aircraft. Having worked with the owner, the number of daytime noise violations reduced to one in 2022.

During 2022, we saw continued success in aircraft adopting CDA, achieving 92% this year (2021: 89%).

Despite the considerable increase in air movements this year, the total number of noise complaints decreased by 14%. In 2021, an organised complaint campaign meant we received around 8,000 additional complaints. Having engaged with local noise action groups, the average number of complaints made per complainant has returned to those seen in 2020.

We recognise that airspace change is a common reason for complaints, and we would encourage anyone affected by noise to engage with their representatives on our Consultative Committee. There were no breaches in noise contours in 2022. A full breakdown of the data can be found in Appendix 10.

The full breakdown of movements and aircraft types can be found in Appendix 5 and Appendix 6.

	2020	2021	2022	
Total aircraft movements	63,593	61,560	118,060	↑
Day movements (07:00 – 23:00)	55,929	54,647	102,101	↑
Night movements (23:00 – 07:00)	7,664	6,913	15,959	↑
Early morning movements (06:00 – 07:00)	2,525	2,423	4,666	↑
Track violation	11	23	48	↑
Departure noise violations (day)	2	6	1	↓
Departure noise violations (night)	0	0	1	↑
24hr Continuous Decent Approach (% achieved)	88%	89%	92%	↑
Noise complaints	4,489	12,432	10,676	↓
Complainants	395	289	1,085	↑
Number of new complainants	165	123	1,106	↑

NOISE INSULATION PROGRAMME

We have a programme to provide noise insulation to local residents who are affected by aircraft noise.

Approximately 1,800 residential properties in the area are eligible for noise insulation funded by the airport. By the end of 2022, we had offered this to 1,400 homes. In 2022, we insulated 114 properties, the most we have ever insulated in a single year.

In addition to reducing the impact of noise, acoustic loft insulation and acoustic window insulation also helps to reduce home energy bills.

NOISE ABATEMENT DEPARTURE PROCEDURE TRIALS

We aim to lead the industry in exploring innovative approaches to reduce noise impacts. We conducted two trials in 2022.

FULL-LENGTH RUNWAY TRIAL

We held a full-length runway departure trial in February and March, when there were fewer aircraft movements. Departing aircraft were asked to use the full length of the runway for take-off to explore whether slower acceleration and less thrust leads to lower noise impacts. LLA worked with local noise action group LADACAN to analyse the data and reported the findings to the Noise and Track Sub-Committee. The trial data showed a half-decibel noise reduction at one monitoring site close to the airport in south Luton. However, the nature of the trial (using the whole length of the runway) also caused delays. The recommendation was to not to implement this change at this time.

DEPARTURE PROCEDURE TRIAL

The second trial was a noise abatement departure procedure trial (NADP). There are two NADP settings on an aircraft, which are shown below on the graph.

We trialled NADP 1 in August and NADP 2 in September, using five noise monitors along the route. The results from the trial are still being analysed at the time of writing and the results will be published in 2023.
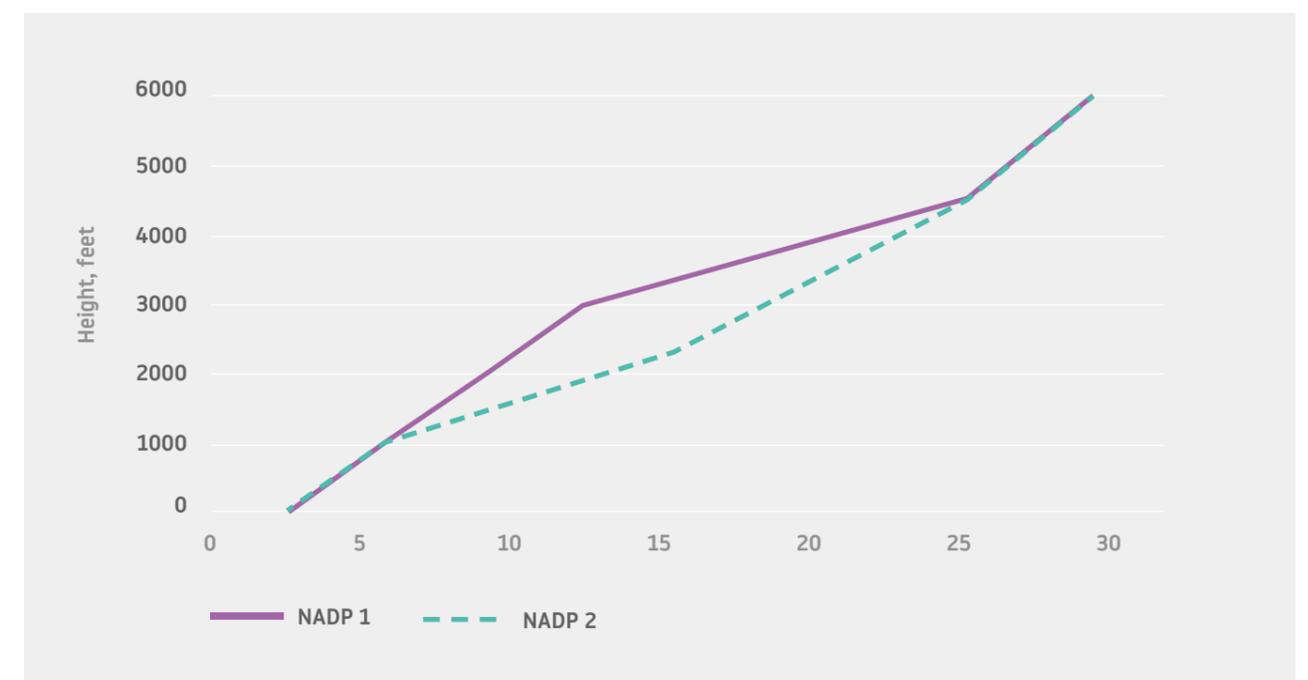
Spills

We aim to limit the number and severity of spills that occur at the airport.

OUR APPROACH

Oil, fuel or chemical spills could result in land and water course contamination if not managed properly. We have implemented risk assessments and procedures to reduce the likelihood of spills occurring and have a well-established spill response plan to ensure that spills are effectively managed.

Throughout the airport, spill kits are located in key areas and on all air operations vehicles. Employees are trained on how to safely respond to spills. All spills are categorised based on their volume and their environmental and operational impact, and are recorded for future reference.

There were 57 spills in 2022 (2021: 46). Of these, only one was classified as major (scoring six out of nine on the risk assessment) a notable reduction on 2021; the rest were minor or negligible. All spills were responded to effectively and there were no pollution incidents during the year.

Light pollution

Light pollution from exterior lighting can cause blight for those living in close proxmimity to the airport. We are careful to consider and choose our options when it comes to implementing lighting solutions

Lighting of the airport is subject to current regulations on operational safety, which we comply with.

De-icing

We will minimise the environmental impact of de-icing fluid by adopting techniques and technologies that use fluid efficiently and allow us to capture and collect used fluid.

OUR APPROACH

Run-off of the glycol used for de-icing can potentially contaminate water courses, which would impact water quality. That is why we are implementing new controls and procedures to ensure we minimise the impact of our operations on the environment around us.

We monitor water quality at discharge points, allowing us to track any water contamination and respond quickly. We also employ several controls to reduce the use of glycol.

Our main de-icing contractor, IDS, uses a forced air/blend temperature technique which minimises glycol usage. We also work with our airline partners to reduce over-spraying and to ensure spraying is targeted solely on the needed areas.

We primarily use acetate rather than glycol for ground de-icing, although some airlines do continue to use glycol independently.

We are moving away from de-icing aircraft on the stands, instead using the dedicated de-icing pads in a limited area. This allows us to capture any overspray and avoid using specialist glycol recovery vehicles. It also reduces delays caused by respraying and fluid retrieval. Pollution control valves are in place to prevent glycol entering the drains in these areas.

Used glycol is currently disposed of but we are investigating the option to build a glycol recovery plant on site, which will have the capacity to recycle glycol from LLA and other London airports. As of the end of 2022, we have a reclamation unit on order and are awaiting engagement from the Environment Agency regarding a permit to undertake glycol recovery at our site. This could allow us to reduce emissions from de-icing fluid by up to 99%.

OUR PERFORMANCE

In 2022, we recovered 6,000 litres of de-icing fluid from across the airfield where stand de-icing takes place.

KPI	2021	2022
Type 1 De-icing fluid sprayed (litres)	89,247	206,301
Type 2 De-icing fluid sprayed (litres)	18,154	9,485
Type 4 De-icing fluid sprayed (litres)	9,050	26,725
De-icing fluid collected (litres)	Pending 2021 measurement	6,000
% of airframes de-iced in designated capture area	18.67%	12%

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
1.1	Carbon accreditation	Achieve the 'Mapping' level of certification within the Airport Carbon Accreditation Scheme by end of 2020 and the 'Reduction' level of certification by end of 2022.	Completed	COMPLETED LLA currently at Level 3 and applying for Level 4 in May 2023.
1.2	Carbon accreditation	Develop a Carbon Management Strategy with ambitious emission reduction target by the end of 2020.	Completed	COMPLETED Net Zero roadmap published in 2022 and Net Zero 2040 target for our emissions (Scope 1 and 2).
1.3	Energy	Source 100% of electricity from renewable sources by end of 2021.	Completed	COMPLETED Sourced renewable electricity for both LLA and our concessions since April 2021
1.4	Energy	At least 25% of the energy we use to come from on-site renewables by end of 2026.	In progress	IN PROGRESS Feasibility trials completed in 2022, with infrastructure work and capacity planning taking place currently.
1.5	Energy	Reduce operational electricity demand (excluding vehicles) to less than 2.0 kWh/pax by end of 2023.	In progress	IN PROGRESS Impacted by COVID-19, but in progress to achieve by end of 2023, with energy efficiency improvements being made and passenger numbers returning to pre pandemic levels. In 2022, 2.3 kWh/PAX.
1.6	Water	Reduce total water consumption to less than 6.98 litres/pax by end of 2023, representing a 10% reduction from the 2018 baseline.	In progress	IN PROGRESS Our progress on this was affected by the pandemic. At the time of writing we are awaiting data for 2022.
1.7	Water	Identify and quantify operations that currently use potable water but could be served by non-potable water by end of 2021.	Behind target	COMPLETED Project delayed due to the pandemic, work has not yet started.
1.8	Waste	Recycle at least 70% of non-hazardous operational waste (excluding aircraft waste) by end of 2022.	Completed	COMPLETED 71% recycling rate achieved in November 2022. Working with concessions at LLA to continue to improve. 100% diversion from landfill achieved in 2022.

Target	Theme	Objective	Status	Progress update
1.9	Waste	Reduce operational waste (excluding aircraft waste) to 0.12 kg per passenger by end of 2023.	In progress	IN PROGRESS In progress, improvement on last year aided by the path back to full operations, achieving 0.125 kg of operational waste per passenger in 2022.
1.10	Waste	Achieve the Carbon Trust Standard for Zero Waste to Landfill accreditation by end of 2020.	Behind target	BEHIND TARGET Delays due to COVID-19. Working with waste partners to achieve Zero Waste to Landfill Accreditation not applied for/ achieved, to be explored in 2023.
1.11	Waste	Less than 5% of non-hazardous construction & demolition waste by weight from qualifying projects to be sent to landfill by 2021.	In progress	IN PROGRESS South Stands project ongoing during 2022, with three environmental audits carried out by LLA. Waste disposed of in designated area before being transported off site. 18 loads of topsoil and 19,539m3 of muck taken off site.
1.12	Air quality	Our Net Zero roadmap includes detailed plans for our transition to a full low carbon fleet using a mixture of sustainable fuels and electric vehicles by 2030.	Completed	COMPLETED Air quality strategy has been developed and includes measures to limit the airport's contribution to air pollution.
1.13	Noise	No Chapter 3 aircraft operating at the airport by 2020.	In progress	IN PROGRESS Whilst during the pandemic this was achieved, with the increase in movements operators are using their Chapter 3 aircraft again. In 2022, 6% were Chapter 3.
1.14	Noise	100% Chapter 4 aircraft or better by 2022.	In progress	IN PROGRESS The proportion in 2022 was 93% and we are working to increase that figure to 100%.
1.15	Noise	Assess if Slightly Steeper Approaches can be adopted and implement recommendations by 2023.	Completed	COMPLETED Study was conducted in 2022 and published on our website. Outcome was that this was not possible at LLA.

Target	Theme	Objective	Status	Progress update
1.16	Noise	Carry out a survey of local communities to seek feedback on our approach to noise management and our complaints service by end of 2020 and define improvement targets.	Cancelled	**CANCELLED** We have paused the stakeholder survey as we felt that with aircraft movements down significantly on the previous year, a survey would not provide a representative view of noise impacts in the community. There was also an airspace change in 2022 which has increased the number of complaints. We will instead complete the survey before the end of 2023 at a time when passenger numbers have increased and the airspace change will have been in place for a longer period of time.
1.17	Noise	By 2020, develop a strategy to define methods to reduce the area of the noise contours by 2028 for the daytime and the night-time.	Completed	**COMPLETED** A plan was submitted in 2020, but superseded by the planning application to increase the passenger cap to 19m submitted in 2019.
1.18	Sustainable travel	Reduce single occupancy vehicle travel to the airport for customers and employees (employees: 2022 – 64%; customers: 2022 – 47%).	Behind target	**BEHIND TARGET** Employee 7% single occupancy for 2022, impacted by COVID-19. Passenger 43%.
1.19	Sustainable travel	Greater than 28% of employees and 36% of customers travelling to and from the airport using sustainable modes of transport by 2022[3].	Behind target	**BEHIND TARGET** Employee 21% sustainable mode 2022, impacted by COVID-19. Passenger 34% sustainable modes.
1.20	Sustainable travel	Promote and monitor sustainable travel at the airport. Secure 12% participation in the staff travel survey by 2020 and increase the number of organisations attending the airport travel forum (2022: 12).	Completed	**COMPLETED** 12.16% of staff completed survey 2022.
1.21	Sustainable travel	Establish a plan for low carbon airside and landside vehicles by mid-2021.	Completed	**COMPLETED** We are including low carbon requirements within upcoming tenders and negotiations.

Target	Theme	Objective	Status	Progress update
1.22	Spills	Reduce the number of fuel spills with a severity rating of 'Major' to less than five per year by 2025, and zero spills with a severity rating 'Hazardous' or 'Catastrophic'.	In progress	**IN PROGRESS** On track, with only one major spill recorded in 2022. Working with Health and Safety to continue progress.
1.23	De-icing	More than 95% of all airframes will be de-iced in areas designed for capture and collection of de-icing fluid by March 2024.	In progress	**IN PROGRESS** As we develop our new de-icing strategy, our designated area for de-icing is now a specific de-icing pad, where we plan to de-ice the majority of planes, rather than on stand. As we implement this target, we plan to increase the proportion of aircraft de-iced on the new de-icing pad.
1.24	Single-use plastic	All new concession contracts to include a requirement for zero single-use plastics.	Completed	**COMPLETED** All new concession contracts have a zero tolerance for single-use plastics. Further aided by an increase in UK Government legislation in recent years.
1.25	Climate change risk	Identify climate change risks and develop a resilience plan and integrate it into business risk assessment process by the end of 2022.	Completed	**COMPLETED** Climate change adaptation report completed and published in 2021.
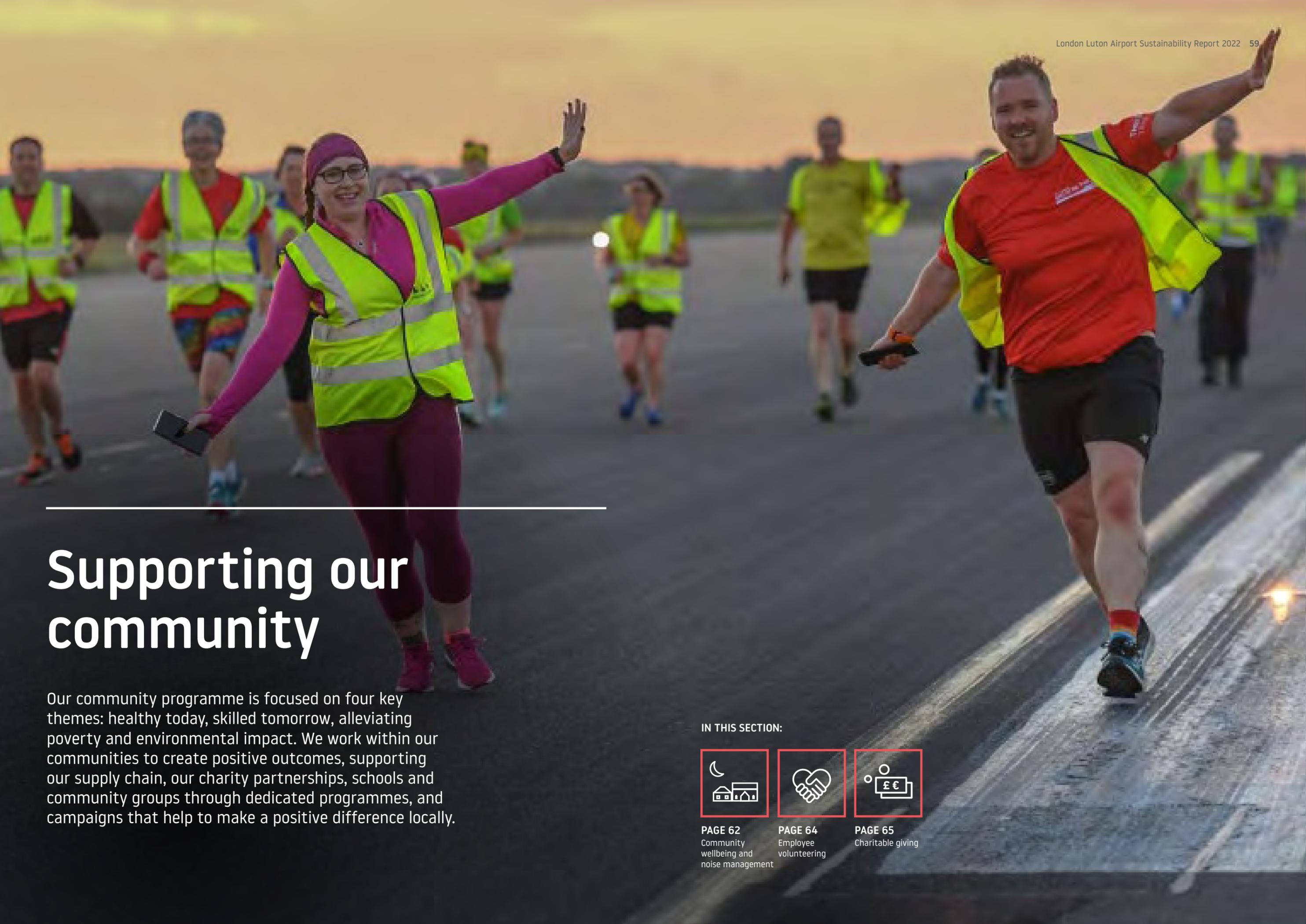
Supporting our community

Our community programme is focused on four key themes: healthy today, skilled tomorrow, alleviating poverty and environmental impact. We work within our communities to create positive outcomes, supporting our supply chain, our charity partnerships, schools and community groups through dedicated programmes, and campaigns that help to make a positive difference locally.

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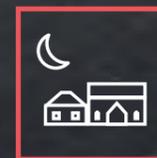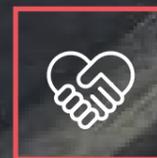
Highlights from 2022

We committed £150,000 to our Community Trust Fund

Benefiting 13,400 people through 23 grants across seven local authority areas.

Continued the 'Get into Airports' programme with the Prince's Trust

To introduce 18- to 30-year-olds to the world of work and prepare them with relevant business insights.

Our employees raised over £60,000 for our charity partners

With a wide range of sponsored activities to support Luton Foodbank and East Anglian Air Ambulance.

Enhanced and improved two targets

Aiming to increase employee volunteering levels and distributing match funding.

Piloted the Greener Future Fund

As part of our CTF we made an additional £100k available to local schools, colleges, charities and community groups that are tackling biodiversity and carbon reduction through innovation and educational initiatives.

"I lead our Community and Corporate Social Responsibility agenda across the business, collaborating with our employees, airport operators, and local partners. Our team drives sustainable processes and engaging programmes and initiatives that ensure we make a positive impact at the airport and within our community."

— **Louise Hanlon, Community & CSR manager**

Our community support approach

A key part of our Responsible Business Strategy (RBS) is supporting positive change in our community. Our community initiatives fall within three key themes and in 2022 we introduced a fourth theme - Environmental Impact:

1 HEALTHY TODAY

MENTAL AND PHYSICAL HEALTH AND WELLBEING

2 SKILLED TOMORROW

UPSKILLING YOUNG PEOPLE

3 ALLEVIATING POVERTY

SUPPORTING PEOPLE TO SUPPORT THEMSELVES

4 ENVIRONMENTAL IMPACT

SUPPORTING OUR COMMUNITY TO MAKE A POSITIVE ENVIRONMENTAL IMPACT

During 2022, we supported these themes by:

1. Giving grants to local causes via the Bedfordshire and Luton Community Foundation.

2. Collaborating with our charity partners and community groups to develop employee volunteering opportunities and fundraising initiatives.

3. Introducing the roll out of an improved match funding and volunteering process

4. Creating partnerships, particularly with charities, Luton Council, Luton Rising, schools and universities, and training providers.

5. Sponsoring the Love Luton Awards and Community Interest awards, which recognise the people and projects making a positive impact in our local area.

We have seven targets in the RBS which can all be found in the table at the end of this section.

Community skills

We work with local schools to provide skills for the world of work, with a focus on communication and problem solving. Through our Connect programme, we equip young people with the soft skills to make a smooth transition from education to the workplace. We also work with the Prince's Trust to provide a pathway to a career in aviation for 18- to 30-year-olds.

In light of the impacts of the COVID-19 pandemic on education and employment needs, we plan to review this part of our community strategy in 2023. This will ensure that future skills programmes align with our wider business strategy, for example through developing graduate and apprenticeship programmes.

OUR COMMUNITY SKILLS APPROACH

LLA is in a great position to support skills and training in the community. As a major employer for a wide range of professions and trades, we are keen to work with local schools and employment providers to share skills and knowledge that will help young people start their careers successfully.

By linking our schools' initiatives with future apprenticeship and graduate programmes, we aim to give young people from our community the skills and opportunities to kick-start their careers, either with us at the airport or elsewhere.

COMMUNITY SKILLS PERFORMANCE

In 2022, we updated our early careers initiatives to provide a structured pathway for students to start their careers.

We showcased exciting opportunities to work within aviation and engineering, and provided a pathway into working at LLA through our Get into Airports programme for 18-to-30-year-olds. This programme includes four weeks of classroom-based modules and hands on work experience across seven departments (including the Airport Rescue and Fire Service, Airside Operations, IT, HR, and Guest Experience) and with our airport partners, such as Signature, easyJet and Wilson James.

Take-up of the programme was lower than in previous years. Feedback from the Prince's Trust revealed this was likely because of changes in the employment landscape after the COVID-19 pandemic. There are now more employment opportunities with flexible arrangements that do not require as much on-site time. We will review the Get into Airports programme to find more ways to incorporate career pathways into our central HR programme.

We visit schools to run our Connect programme, which provides students with the skills and knowledge they need to succeed in their future careers, including communication and problem-solving skills. After pausing the programme in 2021 due to COVID-19 restrictions, we restarted the scheme in 2022. Unfortunately, we were only able to deliver half of the programme because the training provider went into liquidation. In total, we delivered two half sessions to a total of 48 students.

Community wellbeing and noise management

We will improve wellbeing in our community by hosting quarterly noise surgeries. This will ensure local residents are able to access all the support we have in place to address noise impacts.

OUR COMMUNITY WELLBEING AND NOISE MANAGEMENT APPROACH

As part of our Noise Action Plan, we provide a range of ways for community members to engage with us on noise. We also operate schemes to provide residents with noise insulation.

Full details can be found in the Noise section on p44.

NOISE FINES TO SUPPORT NEW GREENER FUTURE FUND

Airlines are fined for noise and track violations. In 2022, we decided to allocate the sum we received in airline fines to improving biodiversity and supporting carbon reduction initiatives.

Employee volunteering

Our volunteering policy allows employees to volunteer two days per year with paid time off. Over the next two years, we will create new programmes to increase employee volunteering uptake, ensuring we give back even more to our communities.

"A huge thank you to our partner London Luton Airport for their amazing efforts last year. They helped us raise awareness and much needed funds for our charity. This is such a difficult time for so many people in our local community and LLA's fundraising efforts are having an incredible impact on the support we provide."

— Salma Khan, Project Manager, Luton Foodbank

OUR VOLUNTEERING APPROACH AND PERFORMANCE

We aim to increase the number of employees involved in our volunteering programme, LLA Heroes.

We organised a number of volunteering events last year, including tree planting, litter picking, speed networking at local schools, and supporting Luton Foodbank. Our largest event was in December, when we planted 390 trees in the Forest of Marston Vale. Photos and feedback from both events were showcased in our internal newsletter and external social media platforms, raising awareness of our charitable work.

Feedback from employees who volunteered during 2022 has been very positive. Our people said they feel it is important to take part in and support our local community, that volunteering is a great way to meet more people within LLA, that it provides a refreshing break from work, and that it is motivating.

In 2022, over 10% of the LLA workforce volunteered for good causes. We therefore did not meet our target of a 15% volunteer rate. We plan to increase employee volunteering by introducing more facilitated volunteering events.

Charitable giving

We provide direct financial support through our Community Trust Fund, which offers grants of £250 to £10,000 to projects that benefit communities across our region. We also have a long-standing employee charity of choice partnership programme, to fundraise and help deliver projects that directly benefit our local community. In 2022, our charity partners were Luton Foodbank and the East Anglian Air Ambulance. We amplify the philanthropic efforts of our employees by offering a match funding scheme.

OUR CHARITABLE GIVING APPROACH

COMMUNITY TRUST FUND

During 2022, we contributed £150,000 to the Community Trust Fund, which benefited 13,400 people across seven local authority areas.

In 2022, the fund distributed 26 grants to charities, non-profits and community groups that contribute to our three themes:

1. Healthy today

2. Skilled tomorrow

3. Alleviating poverty

Here are a handful of examples of the many projects supported by the Community Trust Fund in 2022:

- Veg box donation scheme providing people from South Bedfordshire, mostly single mothers and children, with emergency fresh fruit and vegetables when they are unable to afford food.

- Boxing programme designed to improve the resilience and self-confidence of 13- 18 year olds who are struggling with self-destructive behaviours and/or mental health problems.

- Mental health therapy for homeless people offered over 12 months to those struggling to access support.

- Respite care for disabled young people to enable their main carers and wider family members time away to re-charge and connect.

- Activity club for children and young people with disabilities.

- Free after school cricket sessions for 11–15-year-olds from Luton and wider Bedfordshire.

GREENER FUTURE FUND

This year, as part of our Community Trust Fund we launched the Greener Future Fund, which provides organisations in our local community with grants to deliver projects that tackle biodiversity and carbon reduction initiatives.

OUR CHARITY PARTNERS

In 2022, we continued to support our two charity partners - Luton Foodbank and East Anglian Air Ambulance. During the year, our employees raised a total of £60,000 which will be split evenly between the two charities.

The money was raised through a range of sponsored activities, including a 5km 'runway run' with 200 runners, a 400km bike ride along the coast of Sicily, a golf day and singing Christmas carols in the terminal.

SECURITY TEAM CHARITABLE CONTRIBUTIONS

Our security team continued to support Luton Foodbank and local homelessness charities by collecting hygiene products (shampoo, toothpaste, etc.) that passengers were not able to take with them, so they could be donated.

CUSTOMER DONATIONS

We have a number of guest donation points throughout the airport, where guests can donate foreign currency. In addition, we include the option to make a donation when booking parking.

During 2022, we raised more than £6,500 from guest donations, which all goes to our two charity partners.

Our partnership with London Luton Airport continues to be an incredible success. 2022 was a phenomenal year for fundraising with them raising over £30,000 for the East Anglian Air Ambulance, events included a cycling challenge in Sicily, Golf Day, Runway Run and many other activities. The impact of this partnership is not to be underestimated, their generous support will fund eight life saving missions, provide aviation fuel for 150 helicopter missions. It's our communities and their incredible support that keeps us flying.

On behalf of our patients and everyone at East Anglian Air Ambulance we thank the whole team at London Luton Airport and their customers to the airport for their generous support.

We look forward to continuing our relationship well into 2023 and raising awareness in Bedfordshire for our life saving service. A huge thank you.

—   **Sarah Cunnigham, Bedfordshire Community Fundraising Lead for the East Anglian Air Ambulance**

Case study

THE GREENER FUTURE FUND PILOT

This year, as part of our Community Trust Fund we launched the Greener Future Fund, making £100k available to support projects that can demonstrate tangible results in increasing biodiversity and achieving carbon reduction or zero carbon emissions.

Organisations based and working within a five-mile radius of the airport can apply for grants of up to £10,000 each. The fund is managed by the Bedfordshire and Luton Community Foundation (BLCF) on behalf of LLA.

Our focus was on supporting initiatives that reduce carbon and increase biodiversity, particularly those proposing creative solutions and cutting-edge technologies. We encourage potential applicants to submit robust applications that have detailed plans, measurable targets, and a clear vision for how their initiatives will contribute to a more sustainable future.

"London Luton Airport is a longstanding contributor to our Community Trust Fund, whose donations support many small, grassroots, community groups and charities in our local area. In 2022 we also worked together to develop a new funding stream 'Greener Future' which will go towards local efforts to improve biodiversity and reduce carbon emissions and we continue to work in partnership to ensure the investment has maximum impact on those most in need."

—   **Karen Perkins, CEO, Bedfordshire And Luton Community Foundation**

Case study

RAISING FUNDS BY CYCLING THE SICILIAN COAST

In 2022, we organised a 400km cycling challenge along the Sicilian coast, raising £50k for our two charity partners. Some 30 people took part, including employees from LLA (who used their two days of volunteering on the trip) and our partners. Rybridge, one of our suppliers, was the main sponsor of the ride.

Case study

PARTNERSHIPS TO PROMOTE BIODIVERSITY AND VOLUNTEERING

We created new partnerships in 2022 to enrich volunteering opportunities for our employees and to increase awareness of our new focus on carbon emissions and biodiversity through our Greener Future Fund.

By donating trees to schools and residents, and engaging employees in tree planting activities, we hope to contribute to creating more vital green space, providing environmental education, and enhancing the wellbeing of our employees and local people. That's why, in 2022 we took part in several local tree-planting schemes –the Forest of Marston Vale, the Queen's Green Canopy, and Luton Council's Tree for Free scheme.

We worked with the Forest of Marston Vale to facilitate an employee volunteering event which saw the planting of 390 broadleaf trees. The Forest of Marston Vale is an evolving community forest, which is planting trees and using woodlands to make life better for people and wildlife in the area. Over 80 employees took part as well as people from various partners, including easyJet, TUI and East Anglian Air Ambulance.

We also took part in the Queen's Green Canopy – a tree planting initiative created to mark Her Majesty's Platinum Jubilee. LLA donated 17 silver birch trees to 17 schools across Luton. We visited William Austin Junior School and Bramingham Primary School to help celebrate the children planting their tree, while learning how to look after it and why tree planting is so important.

LLA also donated 53 rowan trees to Luton Council's tree-for-free scheme, which invites residents to apply for a tree to plant in their garden. LLA took this further and planted a silver birch tree at Wardown Park where the event was held. The commitment to the Queen's Green Canopy saw LLA donate 460 trees overall.

The positive feedback from our employees affirmed the value they felt and their eagerness to support the cause. One participant said: "I think we are privileged to have a good job, so it's important to give back. It was great to see colleagues out of the work environment, and to be giving back to the local area."

Case study

THE UKRAINE HUB

We understand that the ongoing conflict in Ukraine has created a difficult and uncertain situation for its people, and we are committed to doing our part to help those who have been affected.

Working in partnership with the Luton Council and local volunteers, LLA was the first UK airport to set up a Welcome Hub for people fleeing the conflict. The hub is staffed by local community volunteers and has supported almost 30,000 Ukrainian arrivals since it opened. It has been visited by MPs, the Department for Transport and many more, recognising the excellent support on offer.

"We have been gifted a beautiful silver birch tree from LLA as part of the Queen's Green Canopy initiative. On 9th February, representatives from LLA and Luton Council attended our tree planting ceremony along with some of our year five pupils.

Our pupils read out facts about the silver birch tree, then Bob, the council's tree expert, answered questions. Our pupils enjoyed using the spade and trowels to fill the hole with soil. We planted the tree in our willow garden, where it will cast shade and be a living habitat for years to come."

—   William Austin Junior School

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
2.1	Charitable giving	Maintain LLA's contribution to the Community Trust Fund at £150,000 per annum.	Completed	**COMPLETED** We contributed £150,000 to the Community Trust Fund. 26 grants across seven local authority areas reaching 13,400 beneficiaries.
2.2	Charitable giving	Promote the airport's employee matched-funding scheme and achieve 20 requests for match funding per year.	Behind target	**BEHIND TARGET** There were three requests for match funding. To increase uptake, in 2022, we improved the application process for employees and increased our communications about the scheme.
2.3	Charitable giving	Dedicate £30k per year to support selected local and regional initiatives that support community spirit and cohesion.	Completed	**COMPLETED** £30k was provided to local initiatives across the year.
2.4	Skills and training	Instigate a training and skills development programme for ten local schools per year. Arrange at least two on-site tours for local schools per year.	Cancelled	**CANCELLED** 50% of the schools communication programme was delivered before supplier went into liquidation. Two school visits completed.
2.5	Volunteering	Increase the proportion of staff taking at least one day of paid time off (PTO) per year for volunteering in the local community meeting the following annual targets: 10% in 2020, 15% in 2021, 20% in 2022, 25% in 2023.	Completed	**COMPLETED** Over 10% of the workforce took part in volunteering in 2022. The year on year increase is behind due to the pandemic.
2.6	Community wellbeing	Implement a programme that supports wellbeing and increases the standard of living in our community.	Completed	**COMPLETED** Through our Community Trust Fund we support health & wellbeing community initiatives in which over 1/3 of our £150,000 funding is given to causes that support local community wellbeing through our Healthy Today pillar
2.7	Community wellbeing	The community support team to attend at least four community noise surgeries a year to showcase the additional support available to members of the community.	Cancelled	**CANCELLED** The community support team attended two surgeries, however this target was cancelled later in the year.
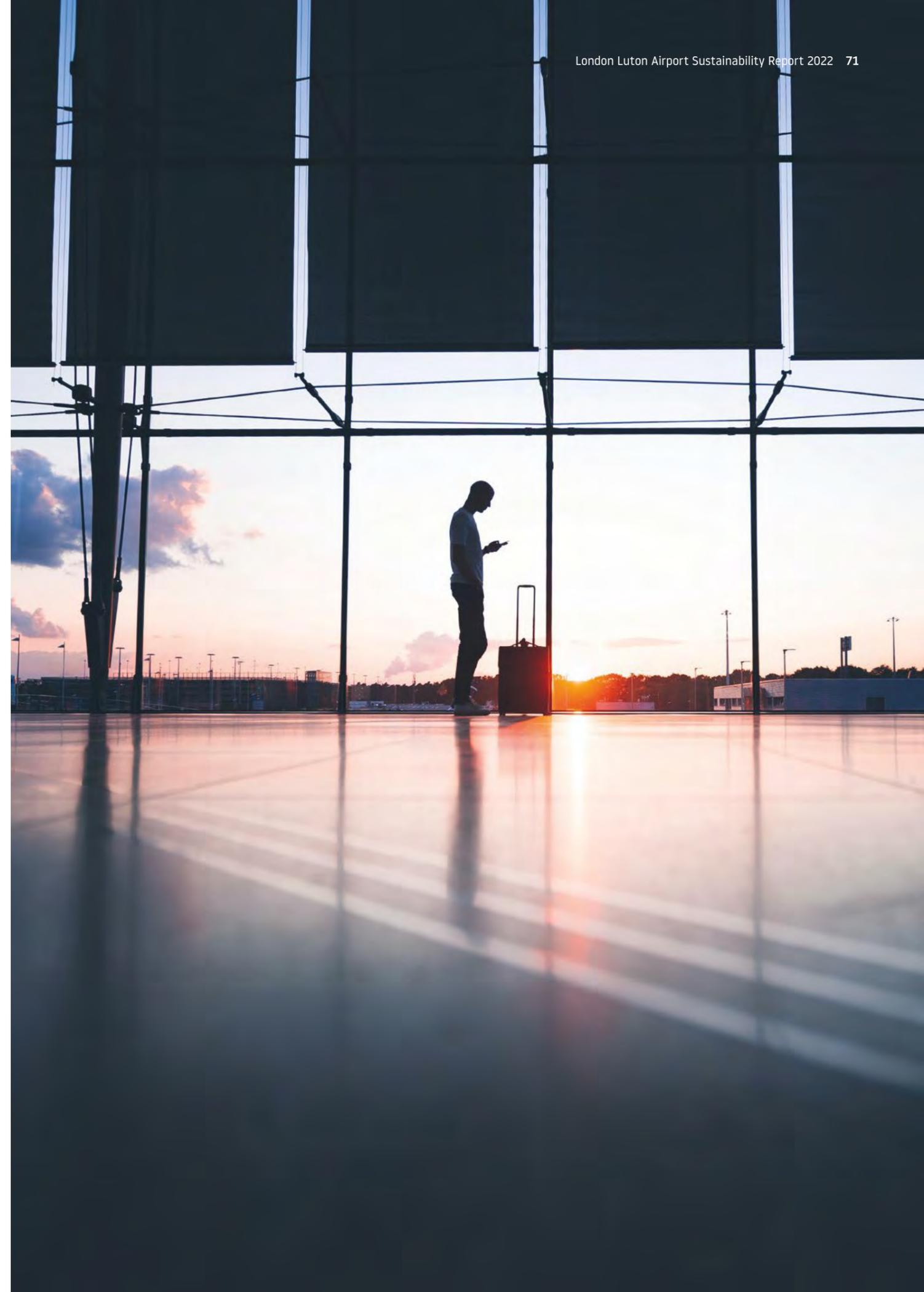
A safe and secure airport

We have set targets to enhance our management of safety and security at the airport. Our programme maintains airside safety and will enhance the skills in our security team, expand our health and safety programme, and increase the protection of our IT networks from physical and cyber network risks.

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Highlights from 2022

Strong recruitment to security team

Bringing employee numbers close to pre-pandemic levels, supported by a market-leading pay increase and career development opportunities.

Enhanced our health, safety and wellbeing culture

Developing a new strategy, growing the team and rolling out a suite of health, safety and wellness related training.

Built security team skills

Rolling out a new professional development programme for Enhanced Safety and Security Operations for the team.

Low bird strike numbers

Relative to previous years, owing to active management of potential bird habitats to discourage wildlife.

"We are committed to providing a safe environment for our colleagues, our families, our friends, and our guests. We want the best health, safety and wellbeing culture possible, where our colleagues can thrive and feel empowered to do the right thing, to take accountability for their own and others' safety, to collaborate with their colleagues, and share information with others to maintain a safe environment. In other words, a culture where everyone feels empowered to Keep Our Airport Safe: The LLA Way."

— **Emma Meenan, Head of Health & Safety**

Airside safety
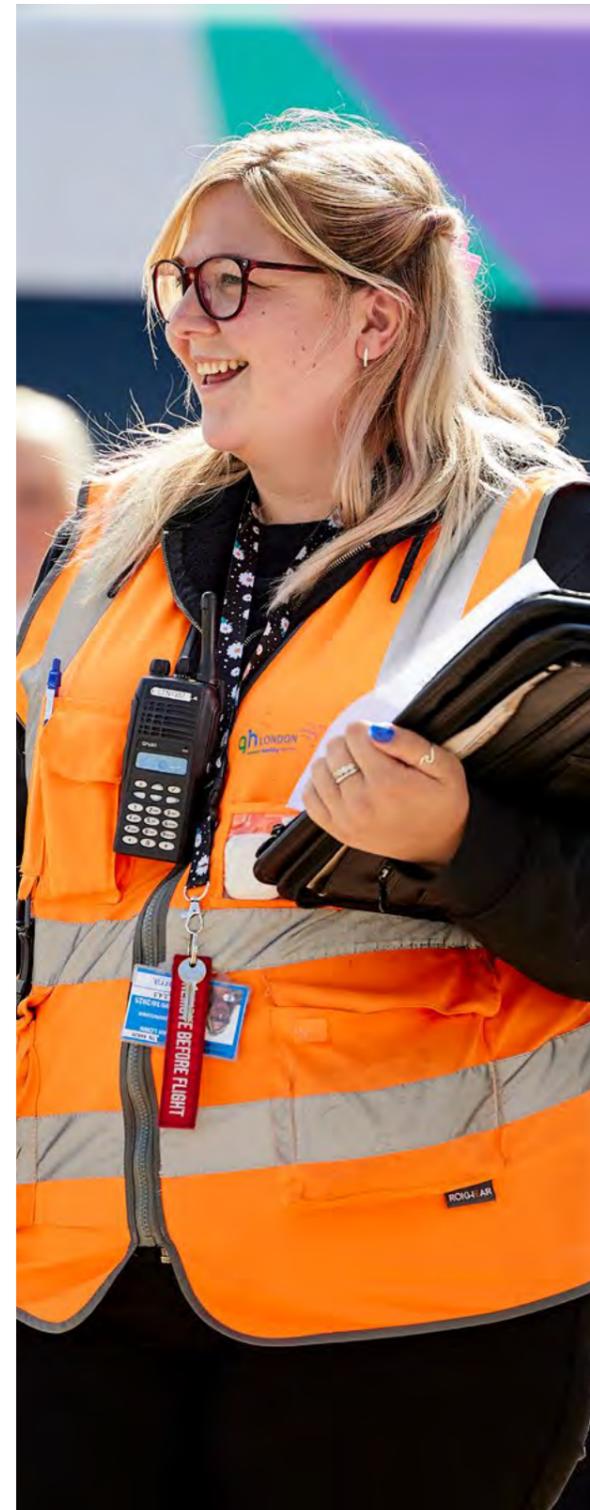
OUR HEALTH, SAFETY AND WELLBEING APPROACH

We operate a comprehensive safety management system to ensure aircraft operate safely at London Luton Airport. For our team and all our airside partners, safety is a core part of our culture and we collaborate closely to identify and manage potential risks.

Since 2017, we have operated the LTN Safety Stack, a first of its kind initiative that brings together all primary aviation companies, including representatives from the airport, airlines, ground service providers, air navigation service providers, aircraft engineers and aircraft manufacturers. We also closely cooperate with regulators.

The Safety Stack improves our safety culture by allowing us to share best practice and collaborate on complex issues. It also helps us align on risk management and safety promotion initiatives, which typically affect several Stack members.

The Safety Stack has significantly improved our safety performance. We use an engagement approach where responsibility, accountability and learning are the central themes supported by a Just Culture, in which people are treated fairly. The success of this approach is evidenced in the annual safety survey, which is based around four themes developed by the London School of Economics:

COMMUNICATION AND COLLABORATION
The information flow of safety related information, notices, incidents or hazard identification; the desire and means for employees to be involved in and work together towards safety improvement.

COMMITMENT
Personal commitment to safety practices as well as the airport management's commitment to resolving issues and providing a safe place to work.

COMPETENCE
The perceived level of knowledge that Air Ops employees have in relation to their duties.

CONSISTENCY
The fair and equitable application of rules and regulations; how people are treated when things go wrong.

The 2022 Safety Survey continues to show very positive scoring and feedback. Our overall safety performance throughout 2022 underpins these results, which will in turn shape our aims and actions in 2023.

PROGRESS

While there has been an increase in activity due to the resumption of normal operations, there is an overall trend from 2019 towards fewer hazardous events. This includes a decrease in collisions, incorrect taxi routing, incorrect parking and spillages. Our metric of 'failure to comply with regulations' has decreased to a third of what it was in 2019. We will continue to monitor our safety metrics closely and make any necessary adjustments to ensure we maintain the highest level of safety for all stakeholders.

Event Type	2019 Total	2020 Total	2021 Total	2022 Total
Holding Point Busts	22	6	9	6
Incorrect Taxi Routing	70	48	28	45
Controllable Species Bird Strikes	6	3	4	9
Collisions	136	60	27	51
Spillages	94	55	46	57
Failure to give way to aircraft	53	14	13	22
FOD Aircraft waste	486	49	62	67
Failure to comply with regulations	154	43	30	54
Failure to comply with Ground Operations Managers	51	69	47	45
Incorrect parking	586	168	119	158
Points of Engagement	12,104	7,292	6,533	9,038

"Our collective purpose airside is to establish and maintain an environment that is safe for use by aircraft. This requires us to be diligent in every aspect of our collective undertakings. Whether it's controlling aircraft on the ground, performing aircraft turnarounds or emptying bins, it is our willingness to collaborate, irrespective of our role, that truly defines us. The LTN Safety Stack Partnership, a safety partnership with all organisations on the aerodrome, gives us such a platform and consistently delivers for all of its partners."

— **Liam Bolger, Head of Airside**

BIRD STRIKES

We take measures to minimise the risk of aircraft striking birds because of the risk to aircraft and life this poses. We actively manage areas such as grass, hedgerows, and trees to reduce bird breeding and roosting spaces, as well as deploying active and passive deterrents to keep birds away from runways.

There was a slight increase in strikes with controllable species, totalling nine. This can be attributed to an increase in aircraft movements this year. This is still a low number of controllable strikes compared to previous years.

RECRUITMENT CHALLENGES AND SUCCESSES

Recruitment was a major focus for our security team this year. While we recruited strongly throughout the year, taking on 82 new employees, we saw 70 people leave the airport. Despite this turnover, we delivered on our KPIs and Service Level Agreements related to queuing times, averaging eight minutes.

Following the COVID-19 pandemic, the number of employees in the safety department fell from 500 to 320 people. This was a result of redundancies, a recruitment freeze, retirement and employees taking work elsewhere.

We saw a marked increase in interest in security roles after our market-leading pay increase, and have swiftly integrated our new employees. We also worked closely with the airport recruitment manager to attract more people from the Luton and Bedfordshire area into roles. We held a recruitment day, as well as employment assessment days to ensure we attract people with the right skills to our team.

THE SAFETY MANAGER AND LEADERSHIP ALLIANCE

The SMLA exists to expand participation in safety and operational performance by significantly emphasising frontline leadership. The aim is to ensure that frontline leaders receive substantial peer-to-peer support from experienced leaders operating within their environment, regardless of their organisational affiliation.
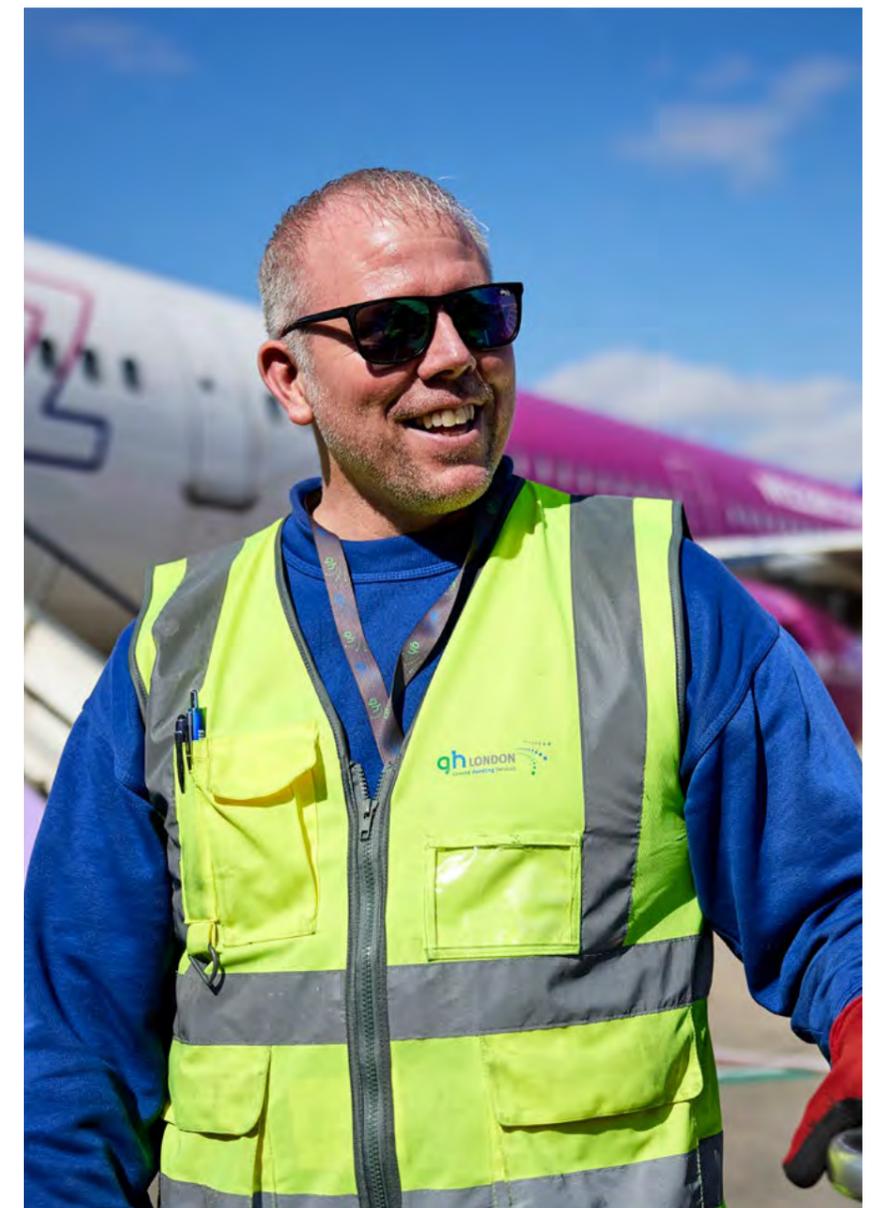
Health, Safety and Wellbeing

We will expand our health and safety programme through the Responsible Business Strategy (RBS). We want the best safety culture possible – one where our colleagues feel empowered to always do the right thing, to take accountability for their own and others' safety, and to collaborate with and share information with others to maintain a safe environment.

PROGRESS

DEVELOPED A NEW HEALTH, SAFETY & WELLBEING STRATEGY AT THE END OF 2022

With the vision 'Enabling our people to thrive through the journey of Health, Safety and Wellbeing'.

RECRUITED A HEALTH, SAFETY & WELLBEING ADVISOR AND A SENIOR H&S ADVISOR

We launched a suite of wellbeing initiatives and trained even more Mental Health First Aiders.

NEBOSH HSE CERTIFICATE IN H&S LEADERSHIP EXCELLENCE TRAINING

Delivered to our senior leaders.

WON A PRESTIGIOUS ROSPA SILVER ACHIEVEMENT AWARD IN THE OCCUPATIONAL ACHIEVEMENT CATEGORY FOR OUR PERFORMANCE IN 2022

In recognition of our ongoing dedication to continuous improvement in the prevention of accidents and ill health at work, thus ensuring the health, safety and wellbeing of our people.

OUR HEALTH, SAFETY AND WELLBEING APPROACH

We operate a comprehensive health and safety management system certified to ISO 45001: 2018, which proactively reviews and improves our operations. We monitor our performance monthly and conduct appreciative reviews to identify areas for improvement.

We have renewed our health, safety and wellbeing strategy to ensure it incorporates the changes to the policy and renewed focus post COVID-19. We have a number of controls in place to mitigate health and safety risks across our operations, and we provide training to employees and contractors to ensure they have the right skills and knowledge to work safely.

The Health and Safety team reports monthly into LLA's overall risk governance structure.

PERFORMANCE

In 2022, we appointed a new Head of Safety. The team grew from two team members to four with the recruitment of a Senior Health and Safety Advisor and a Health, Safety & Wellbeing Advisor.

We rolled out the one-day NEBOSH Health and Safety Leadership Excellence training certificate for the Senior Leadership Team function. The Level 3 NEBOSH Health and Safety at Work training programme continued to be offered to employees with line management and/or health and safety duties.

We also continued departmental stress risk assessment activities. This highlighted that people's resilience is impacted by reasons including workload, resourcing, overly complicated systems and processes, as well as duplication of work affecting productivity.

A Wellbeing Strategy Group was formed, bringing together Human Resources, Sustainability and the Health and Safety Team on a monthly basis.

We carried out a range of activities to support employees with their mental and physical health and wellbeing, including:

- Menopause awareness and support
- Healthy eating and exercise initiatives
- Health checks
- Prostate health
- Financial wellbeing

We continued our First Aid at Work and Mental Health First Aid Training programmes. Our mental health first aiders are trained to identify and connect those in need with professional support.

At the end of the year, we developed a new Health, Safety and Wellbeing Strategy based on our vision of 'Enabling our people to thrive through the journey of continuous improvement in Health, Safety and Wellbeing'. This will be published in 2023.

SAFETY METRICS

Level 1 (low risk) accidents increased from 55 in 2021 to 150 in 2022. Increased guest numbers, the returning of employees from furlough and good reporting culture contributed to this increase.

Level 2 (medium-high risk) accidents remained low and stable in 2022, at 15 events compared to 16 in 2021.

We monitor the Moving Average Frequency Rate (MAFR) to measure the number of safety incidents per guest. The passenger MAFR (passenger safety incidents per 1,000,000 passengers) decreased by 22.8% compared to 2019.

The total incidents MAFR (total safety incidents per 1,000,000) decreased by 12.7% compared to 2019.

There were 157 incidents reported in 2023 compared to 401 in 2019, a reduction of 60%. In 2022, 91% of incidents were rated Level 1 (low risk).

2022 showed an increase of 25% in Near Miss and Hazard Observation reporting compared to 2021. In 2019, there were 3232 near misses and hazard observations reported, compared to 1696 in 2022.

A total of six RIDDORS (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) were reported in 2022, involving three employees and three guests.

All three employee RIDDORS were Lost Time Injuries over seven days. In total, there were 10 Lost Time Injuries in 2022. Sixty-six near misses were reported and 1585 hazard observations were made.

There were no fatalities in 2023.

FOCUS IN 2023

- Publish and roll out our new Health, Safety and Wellbeing strategy.

- Prepare for ISO 45003 certification, the Psychological Health And Safety At Work accreditation as part of our commitment to supporting mental health within the organisation.

- Develop an impairment policy to prevent employees from working while impaired from the use of alcohol, psychoactive substances and medicines.

- Deliver preventative injury workshops for employees who undertake manual handling.

- Roll out a 2023 wellbeing awareness programme based on the results of the survey from our Mental Health First Aiders working group.

- Carry out managers' stress management and psychosocial risk assessments and facilitate Wellness Action Plans

- Traumatic Incident Practitioner training combined with TRIM conversation training for operational line managers.

Case study

SILVER ACHIEVEMENT AWARD

In 2021, LLA joined The Royal Society for the Prevention of Accidents (RoSPA), a UK-based charity that aims to prevent accidents and save lives through its extensive range of safety services and resources.

We were proud to receive a Silver achievement award from the RoSPA in 2022 in recognition of our commitment to continuous improvement in prevention of accidents and ill health, and ensuring the health, safety and wellbeing of employees, third parties and guests.

This award recognises and reflects the airport's ongoing commitment to health and safety management.

Case study

NEXT GENERATION PASSENGER SAFETY

The Next Generation Passenger Safety programme is a new initiative in the aviation industry aimed at ensuring guests' safety, efficiency and comfort. This innovative approach integrates advanced technology with environmental responsibility to enhance the overall travel experience for guests.

The programme will be implemented by June 2024 and follows a change to Department for Transport regulations.

With this programme in place, guests will be able to move through security more quickly and easily. The implementation of advanced CT machines will ensure that bags are scanned in greater detail, thus enabling security personnel to identify potential threats more quickly and accurately. This process improves guest safety and reduces the need for manual checks, thereby facilitating a seamless and stress-free travel experience. The former scanners will be recycled.
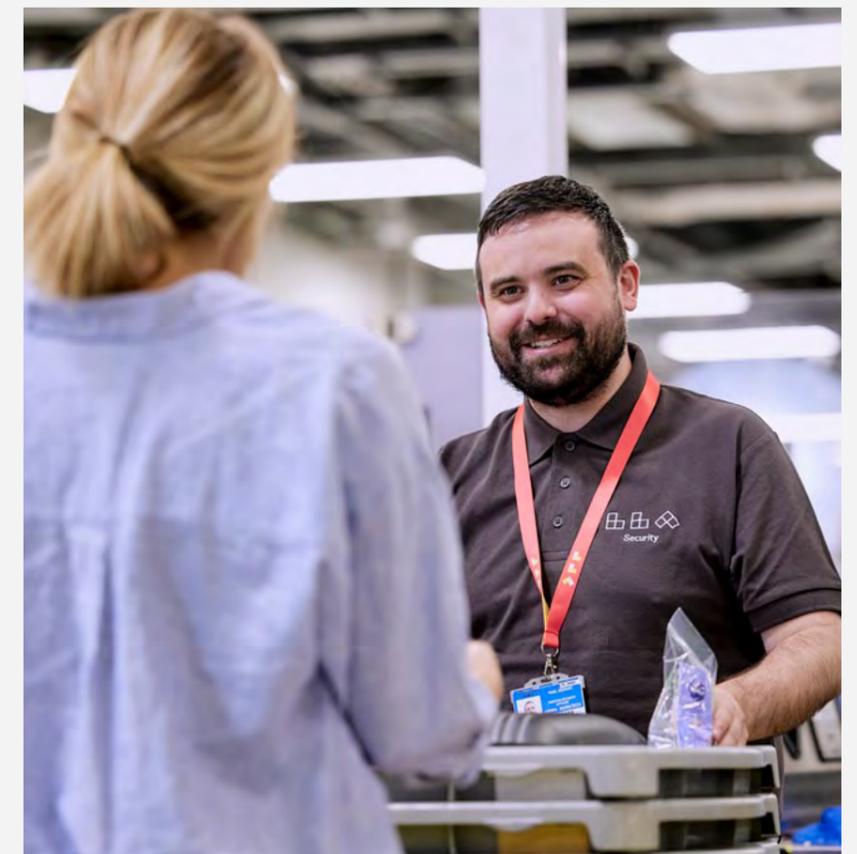
"I lead the airport's Information Technology service. I work with colleagues across the business to ensure IT services and data are accessible and secure."

Paul Ash, Head of IT

Information security and digitalisation

At LLA, we manage a lot of personal and sensitive information and are committed to making sure it's kept safe. We will achieve certification for our information security practices to the ISO 27001 standard, and continue to strengthen the resilience of our networks against cyber and physical risks in line with the Network and Information Systems (NIS) Regulations.

OUR INFORMATION SECURITY AND DIGITALISATION APPROACH

We operate robust procedures to keep sensitive information safe and protect our network against cyber and physical risks. We have clear data protection and information security policies in place and have appointed a data protection officer in compliance with the General Data Protection Regulations (GDPR).

We minimise the volume of sensitive information we hold and limit access to sensitive or restricted information and systems. We operate a secure network, and all company devices and systems are secured with Virtual Private Networks (VPNs) and access controls. We monitor critical IT systems and networks and test network security regularly.

Employees are required to complete annual training on information security, using our e-learning platform. We are also collaborating with Aena, our major shareholder, on cyber security.

PROGRESS

ISO 27001 CERTIFICATION PROGRESS

We had sought to implement the standard for information security management systems (ISO 27001) in 2022. However, we paused work on this target because of employee shortages. Depending on successful recruitment, we hope to begin the certification process in 2023, with a view to completing it in 2024.

PROGRESS ON IMPLEMENTING RECOMMENDATIONS FROM THE NIS REGULATIONS

We have been working closely with other UK airports and the Civil Aviation Authority (CAA) to implement the requirements of the Security of Network & Information Systems (NIS) Regulations. All airports are required to implement these standards to boost the level of security (both cyber and physical resilience) of critical network and information systems.

Following the audit we conducted with the CAA in 2021 to identify recommended actions to ensure compliance, we have submitted and are implementing a corrective action plan. Based on this work, we received a certificate of cyber security compliance from the CAA.

Progress is being made. In certain cases, we require additional information from suppliers and third-party vendors to complete actions. We are confident that we will promptly address the CAA's recommendations and fulfil all necessary requirements.

We are currently working on a restructuring programme for the IT department which aims to enhance our cyber security and compliance capabilities. As part of this, we are expanding the number of roles dedicated to cyber security and compliance within our team. Through this expansion, we are actively driving improvements to our IT and incident management processes, among other strategic initiatives. Our ultimate goal is to ensure that our services not only meet but surpass the requirements set forth by the NIS regulations.

Airport security

We will expand our security training beyond the requirements of the CAA and deliver an excellent customer experience as well as creating clear progression plans for professional development and leadership training for our security teams.

OUR SECURITY TRAINING APPROACH

As the largest team in the airport, training is a priority for the security department. We have developed a programme of enhanced security training above the minimum standard set by the CAA, including customer experience and leadership.

In 2022, we rolled out a new professional development programme for Enhanced Safety and Security Operations, which provides a structured professional development framework for security employees to progress.

PROGRESS

Our Enhanced Safety and Security Operations programme is now being developed by our new talent manager. For the first time, this will form an ongoing training programme for lower levels of management.

Previously, key frontline employees only completed aviation security training. With the new skills provided through this programme, we hope to provide long term careers for our security team employees and secure a high-performing team for the future.

"I'm responsible for security across the entire airport. Within the RBS, my main responsibilities are to ensure that my team, the largest within the airport, is given exceptional training and professional development, and that we play our role in supporting the airport's accessibility and customer experience objectives."

— Chris Jones, Head of Security

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
3.1	Enhanced security training	Create a career development programme for airport security above the minimum requirements stipulated by the CAA, including customer experience and leadership.	Cancelled	CANCELLED The existing programme was cancelled due to the training provider going out of business. We redesigned and started a new professional development programme during 2022.
3.2	Health and safety	Across 2020, share the learning from at least 90% of health and safety investigations to embed lessons learned and prevent repeat events.	Completed	COMPLETED 94% achieved.
3.3	Health and safety	Senior Managers will complete four safety tours a year and we will align this with a recognition scheme embedded in our risk governance process to reinforce best practice and behaviours.	Completed	COMPLETED 120% completed in 2022.
3.4	Health and safety	In 2020, all members of our senior management team will complete training on 'Safety Differently' to support our vision and culture journey.	Cancelled	CANCELLED This target was achieved in 2020 however, during/post Pandemic this has been removed.
3.5	Health and safety	Senior Managers will be required to attend 75% of risk governance meetings throughout the year.	Completed	COMPLETED 76% achieved during 2022.
3.6	Health and safety	We will conduct pre-emptive assessments (appreciative investigations) on each department every quarter to identify opportunities to improve.	Cancelled	CANCELLED Post Pandemic this target was removed. Appreciative investigations are now carried out on ad-hoc basis.
3.7	Health and safety	We will conduct quarterly continuous improvement safety tours for each of our key on-site suppliers.	Behind target	BEHIND TARGET This was not met in 2022 due to the effect of the Pandemic on resource. A revised Continuous Improvement Safety Tour assurance programme is in place.
3.8	Health and safety	% of departmental Continous Improvement assessment closed within deadlines. Target 80%.	Completed	COMPLETED 83% completed.
3.9	Information security	Achieve certification to ISO 27001 (information security management system) by the end of 2021.	Paused	PAUSED We had sought to implement the standard for information security management systems (ISO 27001) in 2022. However, we paused work on this target because of employee shortages. Depending on successful recruitment, we hope to begin the certification process in 2023, with a view to completing it in 2024.
3.10	Information security	Fully compliant with the NIS Directive by the end of 2020.	Behind target	BEHIND TARGET Full compliance has not yet been achieved. Dependencies on LLA suppliers to update their systems/ processes and changes to the LLA Cyber Security Team have slowed progress.

Grow with our people

Our objective is to support careers in airports and aviation. We implement programmes that will help our people to gain skills, knowledge and experience to further both their careers and our combined capabilities. We also work with our community to help people take their first steps into the sector.

The Responsible Business Strategy includes a clear commitment to making LLA a great place to work. This means taking action to facilitate talent within our team and our wider communities, and to support equity, diversity, inclusion and fair pay.

We listen to our people and actively engage with our teams. We support a flexible working approach, which contributes to the wellbeing of our employees.

The COVID-19 pandemic created exceptional challenges for our business and our employees over the last three years. We will continue working hard to create a supportive working environment and to promote employee wellbeing.

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Highlights from 2022

Developed our first Equity, Diversity & Inclusion strategy

Based on an in-depth consultation with our people.

Recruited a new Culture and Engagement manager

To accelerate our progress on creating a great place to work.

Became a Real Living Wage workplace

Recognised by the Living Wage Foundation.

New salary structure implemented

Including increased pay and enhanced parental leave entitlements.

"The HR team works to transform our people's experience of LLA. We are an ambitious team with diverse realms of responsibility. The Reward team strives to ensure we provide our people with the best benefits, rewards, competitive pay, and recognition. The Organisation Development team looks at how we acquire people, how we listen, engage, and improve employee experience, and develop them to be their best. Our People Services team promotes and delivers these exciting initiatives while equipping our people with the highest level of support, compliance, and advice."

— **Jo Reeve, Head of People Services**

Facilitating talent

Aviation offers rich career opportunities. At LLA, facilitating talent means attracting the best talent while supporting our employees to develop meaningful and fulfilling careers. That's why our Responsible Business Strategy (RBS) contains strategies for attracting entry level talent and developing the talent we already have at LLA.

OUR FACILITATING TALENT APPROACH

To ensure our ongoing success, we need to attract great talent and provide opportunities for our team to learn and develop.

Together with our community team, we also support school partnerships and initiatives like the Get into Airports programme run by the Prince's Trust. This showcases opportunities in aviation and helps to build a talent pipeline within the region.

Our HR team oversees a training and development structure, with each department managing technical training plans for their teams. We conduct personal development reviews annually to provide all team members with an opportunity to get feedback on their performance and to establish clear development goals.

We are keen to do more in this area and are developing a facilitating talent strategy, which will extend our talent pipeline initiatives and our professional development structures.

Because we want to appreciate people's work and offer exceptional career opportunities, we are implementing a wider recognition programme to extend the recognition scheme trial implemented during the pandemic.

PROGRESS

A new, improved Annual Achievement Review process was approved at the end of 2022, and is being rolled out in 2023.

In 2022, we took a targeted approach to talent development, rolling out a leadership development programme. All senior leaders attended the course and worked with a talent coach. Core skills training was delivered to all managers to help them in their day-to-day leadership.

We got sign-off to research, design and roll out an early careers plan at LLA in 2023.

Furthermore, we recruited 76 corporate and management colleagues, and delivered 13 recruitment events and assessment days, hiring 75 security officers. This was a particularly important achievement, having seen many security officers leave the airport during the COVID-19 pandemic, and given the strong competition we face from other employers.

From 2023 onwards, we plan to roll out an early careers programme to build skills in aviation and attract talented people to work at LLA.

POLICIES

We have a comprehensive set of HR policies in place which we continually review, most recently in light of our new Equity, Diversity and Inclusion strategy:

- Special Leave
- Study Leave & Sponsorship
- Training & Development

- Business Ethics
- Equal Opportunities, Inclusion & Dignity
- Counter Terrorism Check
- Occupational Health
- Performance Management
- Social Media

- Whistleblowing
- Carers in the Workplace
- Code of Conduct
- Disciplinary
- Grievance
- Sickness & Absence
- Maternity
- Paternity

Diversity and inclusion

We will take positive action to improve equity, diversity and inclusion within aviation. We have developed our first Equity, Diversity and Inclusion strategy in close consultation with employees and a specialist provider.

OUR DIVERSITY AND INCLUSION APPROACH

We recognise workplace diversity is a strength, and our policies set out our commitments to encourage diversity and prevent discrimination of any kind. In 2022, we published a new Equity, Diversity and Inclusion strategy which is focused on promoting a sense of inclusion, actively listening to LLA employees, and ensuring equitable treatment. Our corporate strategy includes core diversity commitments that align with this new strategy.

UNDERSTANDING OUR EMPLOYEES' EXPERIENCES

In 2022, we worked with an external provider to better understand the experience of employees from different backgrounds. This involved sending a survey to every employee, and carrying out targeted interviews and focus groups. We used the findings to formulate a strategy for the short, medium and long term.

Demographically, LLA represents a fairly typical and mature workforce within the aviation industry: 59% of employees identify as men, 41% as women, and the average employee age is 42. Many positive displays of inclusion have been noted such as good management, working to eliminate bad behaviour, women firefighters, and working to support local community initiatives that address health and poverty.

Our employees also demonstrated an excellent understanding of what diversity and inclusion is, and no single person who took part in this exercise could recall an act of prejudice between colleagues. Where prejudice exists, it is from customers against LLA employees

OUR EQUITY, DIVERSITY AND INCLUSION (ED&I) STRATEGY

Our new strategy is called 'At Work It Is Easy to Be Me', and it was signed off at the end of 2022. The strategy outlines specific steps we will take to ensure we attract, recruit and retain a diverse workforce, and that LLA employees feel that they are included, listened to and treated fairly.

The strategy sets out range of actions to implement from 2023 onwards:

SHORT TERM ACTIONS (2023)

- Review, identify gaps, and improve policies and processes, creating new policies where needed (e.g. parental leave, grievance, equal opportunities).
- Improve our collection of demographic data.
- Introduce regular surveys to improve collection of insight data.
- Deliver equity, diversity and inclusion training to managers.
- Enhance our employee value proposition, including creating a careers and recruitment page.
- Deliver conscious inclusive hiring training for LLA's hiring managers.
- Increase ED&I related questions within the survey and action planning.

MEDIUM TERM ACTIONS (2023 TO 2024)

- Develop transparent career pathways for employees.
- Work with supply chain and sustainability teams to embed diversity criteria within our procurement frameworks.
- Introduce an ED&I based objective in senior leader performance development reviews.
- Enable employees to join (or set up) networks and groups that they want to see, for example networks for LBGTQIA+ people, disabled people and racially-minoritised people.
- Create a reverse mentoring scheme, in which more senior employees are mentored by people in less senior positions.
- Create a shadowing policy and procedure to help people progress in their careers.

LONG TERM ACTIONS (2024 AND BEYOND)

- Develop a growth mindset culture to promote accountability and learning.
- Appoint a Talent Manager who will embed apprenticeship schemes, graduate schemes and other early career initiatives.
- Continual review and adjustments where required to this strategy, to ensure it remains embedded, relevant and inclusive.

ONGOING ACTIONS

To be carried out continuously, or when the opportunity arises:

- Create a more diverse senior team by ensuring that, when roles are available, recruitment process is diverse and inclusive.
- Update the Organisational Maturity Matrix annually so we can evaluate our progress.
- Incorporate ED&I into our internal communications such as Town Halls, CEO updates and the quarterly newsletter.
- Create an inclusion calendar celebrating cultural and religious events.

DIVERSITY AND INCLUSION PERFORMANCE

GENDER DIVERSITY

At the end of 2022, there were five women serving on our Board of 15 (42% women). Women make up 12.5% of our executive management and 23% of our senior management. In total, 41% of our employees are women.

Some teams have a high proportion of men. The cargo, TSD, fire service, baggage control and IT teams have more than 90% men. Commercial and airside operations have more than 80%. Gender diversity in our largest team, the security department, is around 50:50. This is also the case for our terminal team, legal team and marketing team.

Some departments have a high proportion of female employees, including sustainability, finance, procurement and HR, which all have more than 75% women in their teams.

Level of organisation	Female		Male		Other or no gender reported		Total
Board	5	42%	7	58%	-	-	12
Executive management	1	12.5%	7	87.5%	-	-	8
Senior management	5	23%	17	77%	-	-	22
Total employees	269	41%	386	59%	-	-	655

GENDER PAY GAP

Our mean gender pay gap overall is 26.5% and the median is 22.4%.

The mean hourly rate of pay is £15.93 for women and £19.95 for men, a gender pay gap of -20.15% for mean hourly pay and -26.09% for median hourly pay.

There is no significant gap in bonus pay – both men and women are at 2.9%. The gender pay gap reflects the fact that around 70% of roles in the airport are entry level roles, and there are challenges in attracting and retaining women into senior positions within aviation.

We have published the gender pay gap data for 2021 and 2022. We did not publish our 2020 data because of constraints during the height of the pandemic.

The gender pay gap at LLA is due to the fact that there are fewer women in senior roles than men. Considerably more men are in the upper and upper middle pay quartiles than women (77.9% men in the upper pay quartile). This is an improvement from 2020 (84.4% men in the upper pay quartile).

There are no differences in pay for people performing the same roles, and pay equality is audited by Aena, the airport owner.

WHISTLEBLOWING POLICY

We introduced a whistleblowing policy whereby any employee can anonymously report something they have a concern about, such as harassment or bullying. We are committed to fostering a culture of openness and transparency, where everyone feels comfortable reporting any issues they have.

We aim to reduce the gender pay gap through better representation of women at senior levels through our ED&I strategy, through measures such as:

- Recruiting through schemes like Women in Aviation
- Updating our recruitment and HR policies to embed the new ED&I strategy principles
- Rolling out enhanced diversity training for recruiters and adopting tools to tackle unconscious bias such as anonymising CVs
- Requiring diverse shortlists for senior roles
- Exploring new ways to nurture diverse talent within the organisation, such as employee forum sub-groups

ETHNIC DIVERSITY

We do not currently hold comprehensive data on ethnic diversity within the LLA workforce, but plan to introduce new systems that will capture this as part of our ED&I strategy. We are committed to ensuring equal opportunities to people from all backgrounds.

During 2022, we celebrated the broad range of cultures represented in our workforce, with our weekly newsletter evolving to ensure it captures events that are meaningful to all LLA employees.

	Female	Male
Mean hourly rate of pay	£15.93	£21.73
Mean GPG in hourly pay	-26.5%	
Median GPG in hourly pay	-22.4%	

	Female	Male
Paid bonus	16%	19.4%
Mean GPG in bonus pay	77.2%	
Median GPG in bonus pay	0.0%	

Employee wellbeing

Making LLA a great place to work means stepping up our efforts on employee wellbeing. Wellbeing now sits under Health & Safety following the introduction of ISO045003. See p78.

Fair Pay

Fair pay is integral to making the airport a great place to work. We committed to achieving Living Wage Accreditation as part of our fair pay review.

OUR FAIR PAY APPROACH

We ensure that all employees are paid a Real Living Wage. Given the financial hardship many people face due to increasing living costs, this has never been more important. We use the UK Government's real living wage rate and, given that prices can rise faster than wages, we conduct an annual assessment to ensure we continue to pay the Real Living Wage.

Following our 2022 employee survey, we introduced a new salary structure. The new framework is designed to be both fair and competitive, and includes an increase in pay and enhanced parental leave entitlements.

LLA also operates a profit share scheme, which means all employees can share in the airport's success. In 2022, the profit share per employee was £1,487.21.

PROGRESS

In March 2022, we became a Real Living Wage workplace, recognised by the Living Wage Foundation. This formal recognition of our long-standing commitment to fair pay is an important milestone for us.

PAY REVIEW 2022

In 2022, we undertook a full pay review for all employees to ensure we can attract and retain talented people. This will result in a pay rise of up to 14.4% for some people. See the table for more detail.

Element of deal	Amount
Base pay increase to all eligible London Luton Airport Operations Limited (LLAOL) employees.	6%
Guaranteed permanent increase to base pay through partial reallocation of profit share. (NEW)	£2000
ASQ (Airport Satisfaction Questionnaire) Quarterly incentive payment introduced to all LLAOL employees. (NEW)	£100 per quarter
Maternity leave pay increase (NEW)	24 weeks full pay, 4 weeks half pay
Paternity leave pay increase (NEW)	4 weeks full pay
Refer a Friend scheme (NEW)	£500 per successful referral
Rotating Security Officer night premium increase (currently 86p per hour)	£1 per hour
Length of proposal	14 months (1/11/2022-31/12/2023)

Internal engagement

The COVID-19 pandemic exposed the importance of employee engagement and an effective communication culture. We are working harder than ever to ensure employees feel informed and engaged.

OUR INTERNAL ENGAGEMENT APPROACH

It is vital our people feel connected and engaged across our business. We have deployed a range of tools to help with this. Our internal engagement strategy is designed to include approaches that suit the diverse roles across the airport. We appointed a new Culture and Engagement Manager in 2022 who is responsible for delivering our engagement strategy.

Our approach includes:

- Weekly and monthly newsletters and regular video updates from our CEO.

- Yammer – an internal social media platform for employees to communicate with each other.

- New platforms for employees' ideas and suggestions, both local and LLA wide.

- Town halls, all hands meetings, and senior management led informal sessions to share information and answer questions.

- Ask HR - a dedicated email address for employees to ask questions.

We also conducted our first annual engagement survey in February 2022, which explored important issues including the effectiveness of communications, team meetings and leadership.

While many people access the intranet or engagement-related emails, face-to-face communication is often more effective for those in frontline roles, such as security, maintenance or customer service. We are prioritising this sort of engagement to help to foster a culture of openness and transparency, where everyone feels heard and valued.

PROGRESS

EMPLOYEE SURVEY

We conducted our first employee survey to better understand the needs and expectations of our people. A specialist consultancy conducted 1-2-1 interviews and focus groups to examine our workplace culture and identify areas for improvement.

We have developed a strategy with short, medium, and long-term goals to address the issues raised. In particular, the survey results showed our employees want to see improvements in the areas of pay, parental leave pay, gender pay gap reporting, and profit share for employees.

In response, we have taken the following actions:

- Agreed an enhanced parental pay policy (see Pay Review section above).

- Agreed to a full review of our long service awards, to be relaunched in 2023.

- Approved and launched a tender for an electric vehicle scheme for employees.

- Improved our approach to using employees' ideas and suggestions, including adding a page to the intranet, more frequent newsletters, face-to-face interaction, more visibility from senior team, more engagement and feedback sessions.

- Moved internal communications to HR to strengthen the above.

- Hired a wellbeing advisor within the Health & Safety team and are formulating a wellbeing strategy.

- Continued to review our approach to recruitment, including benchmarking and the pay review. As a result, in 2022 we were able to recruit 151 employees.

"Organisation Development is about enabling LLA's performance and effectiveness. As the Organisation Development Manager my aims are to set LLA up with the best processes, resources and teams to deploy the strategy, maximise how we relate to and interact with colleagues and to get the best out of what we have, and creating an environment where our people can thrive. The team and I focus on exciting areas from acquisition to employee engagement and their experience, to talent development and our culture here at LLA. We want to promote a workplace where everyone feels it's easy to be me."

— **Louise McKenzie,
Organisation Development Manager**

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
4.1	Facilitating talent	Develop a facilitating talent strategy by the end of 2020, including entry-level talent. Support Luton Council with a financial commitment for their training academy. We will put in place measures that will double the number of apprenticeships by 2021.	In progress	**IN PROGRESS** LLA has implemented a talent strategy including on entry level talent, recruitment campaigns and local support with Luton Council and Luton Rising. We are refreshing our approach to early careers with apprenticeships and graduate schemes to be rolled out by the end of 2023.
4.2	Facilitating talent	In partnership with the Prince's Trust deliver no less than two 'Get into Airports' programmes, each with 15 individuals or more, securing a 75% or higher positive outcome.	In progress	**IN PROGRESS** One programme was completed in 2022 with four students receiving a Level 1 certificate in Exploring the Aviation Industry. Feedback from the programme provider, the Prince's Trust, was that its student onboarding process has changed and demand for the programme has decreased, and it is re-evaluating its training programme. We are reviewing future talent programmes to ensure the most positive outcome can be achieved.
4.3	Facilitating talent	Promote airport career opportunities. Complete ten career and job events for schools including events at the airport and in schools. Activities promoting career opportunities and employment to be focused within the more deprived wards.	In progress	**IN PROGRESS** Seven events took place in 2022. Two through our BLCF Grant fund, three working with universities and two onsite airport 'World of Work' days.
4.4	Diversity and inclusion	Develop a broad Diversity and Inclusion strategy by the end of 2020. This will include supporting Women in Aviation and Aerospace Charter making a commitment to work together to build a more balanced and fair industry for women.	Completed	**COMPLETED** ED&I strategy signed off December 2022.

Target	Theme	Objective	Status	Progress update
4.5	Wellbeing	Develop a wellbeing strategy by the end of 2020.	Completed	**COMPLETED** Health, Safety & Wellbeing strategy has been published. Wellbeing now sits under Health & Safety following the introduction of ISO45003.
4.6	Wellbeing	15% of staff to receive mental health first aid training by 2020.	In progress	**IN PROGRESS** 95 staff have undergone mental health first aid training (13.7%)
4.7	Fair pay	Undertake a cost-benefit analysis of achieving Living Wage accreditation status and present for decision by the end of 2020.	Completed	**COMPLETED** LLA was accredited as a Real Living Wage employer on the 31st March 2022.
4.8	Internal engagement	At least 85% of staff to confirm they are 'well informed' or 'very well informed' about our vision, values and strategic pillars in 2020.	In progress	**IN PROGRESS** Now actively monitoring employee understanding and support of our vision and values.
4.9	Internal engagement	At least 60% of staff to feel they have a voice on what goes on at the airport in 2020.	In progress	**IN PROGRESS** 61% of employees completed the annual survey in 2022.
4.10	Internal engagement	Raise the visibility and profile of the Executive team with at least 80% of staff knowing the team members by 2020.	Completed	**COMPLETED** Completed. No longer tracking but using comms strategy to ensure that visibility is maintained.
4.11	Internal engagement	Support and enable managers to become better communicators with at least 60% communicating with their teams 'regularly' or 'very regularly' by 2020.	In progress	**IN PROGRESS** Completed. No longer tracking but using comms strategy to ensure that good communication with teams is maintained.

Deliver great customer experience

Delivering great hospitality for everyone who travels through LLA is very important to us. Following the update to our customer experience strategy in 2021, we rolled out the 'LLA Way' which sets the expectations for service for everyone working at LLA, and creates a blueprint for both direct and non-direct employees. This year, we built upon these strong foundations, implementing a host of activities to ensure we consistently deliver great hospitality.

Highlights from 2022

LLA Way training delivered to the whole business

650 employees received their 'license to serve', recognising their completion of our bespoke customer experience training course.

6% increase in guest satisfaction scores

And 96% of guests rated their experience as good, very good or excellent.

King Charles rode on the brand-new Direct-Air-Rail Transit

Which will provide low carbon, fast access to the airport for our guests.

"My job is to make flying through London Luton a great experience for all our guests. To keep delivering the best possible experience, we've invested in new infrastructure and staff training."

— **Clare Armstrong, London Luton Airport Head of Guest Experience**

Guest experience

Through our Guest Experience Strategy and Service Standard, we ensure we deliver outstanding customer experience across the whole airport. We closely monitor guest satisfaction and set targets to increase our guest experience scores. We are committed to building back better from the COVID-19 pandemic, and with guests returning to the airport this year, we are focused on delivering an outstanding experience.

OUR GUEST EXPERIENCE APPROACH

Guest satisfaction is at the centre of our business, and we work hard to ensure that everyone who flies through LLA has a great experience. We have developed a comprehensive guest experience framework called the LLA Way which sets out our culture and approach.

Our team of dedicated guest experience colleagues has a unique skillset. Many are multi-lingual and all can see a situation from a guest's perspective. They are vigilant in identifying where a guest needs help and can put guests at ease, especially when they are tired, in a rush or panicked.

We provide guest experience training to all frontline employees, including those working with third parties, to ensure a consistent, high-quality experience.

Delivering excellent service requires us to be responsive to the needs and expectations of our guests. To ensure we are meeting these needs, we use a range of feedback mechanisms, including real-time guest satisfaction buttons at every touchpoint and ACI World's globally recognised Airport Service Quality (ASQ) programme, an independent survey of guest experience.

DELIVERING OUTSTANDING GUEST EXPERIENCE: THE LLA WAY

The LLA Way service standard sets out our vision, purpose and service signatures:

Cx Vision	To deliver great guest hospitality - consistently!			
Cx Purpose	To delight our customers by making travel safe, accessible, simple and enjoyable			
Cx Service Signatures	We work collaboratively as one team	We build loyalty by showing we care	We take accountability for the end to end customer journey	We share what we know

Great guest experience is everyone's responsibility, and we aim to train and certify all frontline employees including security, cleaning teams and third-party employees with their 'licence to serve'. The online training helps employees to:

1. Understand and feel proud to actively support the LLA vision to be the simplest and friendliest major airport in the UK.

2. Be aware of the impact everyone has on the experience of our guests.

3. Be able to describe the LLA Way behaviours and how they relate to their own role.

4. Recognise where they fit into the wider LLA team and the importance of working together to deliver the vision.

5. Feel confident in delivering great guest experience, consistently.

Employees in a leadership role will receive further training, 'Leading a Service Team', which helps them have the confidence and skills to lead their teams in delivering the LLA Way. The training will help all colleagues understand our service aspiration, our service strategy and the behaviours that we expect when interacting with guests at LLA.

PROGRESS

THE LLA WAY

In 2022, the Guest Experience Team developed a set of new service standards that bring to life the values in our corporate strategy. The LLA Way consists of four service signatures that create a blueprint for all direct and indirect employees. By owning the service expectation at LLA, we can ensure everyone on-site is accountable and driving consistency in the end-to-end guest experience.

Between August and December 2022, we developed and rolled out online training to the entire business. Over 650 employees completed the training and earned their 'license to serve' – marking the start of a new era of service delivery. We saw a 6% increase in our guest satisfaction scores and exceeded our Staff Index target.

MONITORING GUEST EXPERIENCE

Our 2022 guest satisfaction scores were the highest we have ever had, with guests rating their overall satisfaction as 4.0 out of 5.0. We also received record Net Promotor Scores (NPS) from an independent survey carried out by the Civil Aviation Authority (CAA).

Case study

AWARD-WINNING GUEST EXPERIENCE

Our guest service was recognised at the 2022 UK Guest Experience Awards held at Wembley Stadium. LLA and our guest experience partner, Ethos Farm, were presented with the UK CXA Silver Award in the coveted Business Change and Transformation category.

Celebrating its 13th year, the UK Guest Experience Awards recognises organisations that strive to enhance their guest experience in innovative ways. The awards recognised the impact of the LLA Way Service Standard as an effective strategy and blueprint helping all employees provide a consistently courteous, responsive and caring guest experience.

As guest numbers at LLA increased in 2022, we continued to provide a smooth and friendly travel experience, with an average wait time in security of nine minutes or less. More than 96% of guests who passed through LLA in 2022 rated their experience as good, very good or excellent.

Alongside this, we were recently named runner up in the Condé Nast Readers' Choice Awards for 'best airport', one of the longest-running and most prestigious awards in the travel industry. We were also ranked in the top three UK airports for guest experience in 2022 by Net Promoter Score.

"The unprecedented situation that we have seen over the past few years has highlighted the importance of adapting to change and evolving our thinking around the guest experience. Our mission to deliver service the LLA Way is based on collaborating as one team and taking accountability to deliver the best possible end-to-end guest experience at London Luton Airport. This award is testament to the hard work of our entire team and we are delighted to have received this recognition alongside our guest experience partner, Ethos Farm."

— Clare Armstrong, London Luton Airport Head of Guest Experience

Case study

KING CHARLES' VISIT

In 2022, His Majesty King Charles III made his first visit to Bedfordshire as the monarch, and LLA gave him a warm welcome. During his visit, the King had the opportunity to travel on the newly built Direct Air-Rail Transit (DART), an energy-efficient cable car that transports airport guests from Luton Airport Parkway station to the LLA terminal in four minutes. The DART project is part of LLA's wider mission to help reduce carbon emissions and create a more sustainable future.

Upon arrival, the King was greeted by Alberto Martin, the CEO of London Luton Airport, and introduced to employees from across the airport, including LLA's Prince's Trust graduates. As a strong proponent of environmental projects, the King was impressed by LLA's efforts to reduce its carbon footprint and create a more sustainable future. During his visit, he also met with frontline airport employees and learned more about their work in delivering operational and service excellence.

The King's visit to LLA was also an opportunity to highlight the DART project, which is being delivered by the airport's owner Luton Rising. The project has already made a positive impact on the local community, with over 80% of contractors' materials and recruitment sourced from within 20 miles of Luton. The construction of the DART also supported around 500 jobs across a range of disciplines, including 80 full-time posts for local apprentices, graduates and other new entrants.

The King unveiled a commemorative plaque at the DART Central Terminal station. The visit concluded with a performance by the choir of Cardinal Newman School in Luton, who were excited to perform Angels' Carol by John Rutter for the Royal visitor.

Image above: The moment Cardinal Newman School Choir found out they would be performing for HM King.

Accessibility for all

We want LLA to be accessible to everyone. We have worked hard to ensure our facilities make travelling through the airport as stress-free and seamless as possible. To ensure we continue to improve, we run an accessibility focus group to get feedback on what is working well and where we need to do better. We have also set a target to achieve the highest rating from the CAA for Persons of Restricted Mobility (PRM). Although we did not meet our target in 2022, we have made significant strides, learned valuable lessons and remain dedicated to continuous improvement.

OUR MANAGEMENT APPROACH

We provide specialist support for People with Reduced Mobility (PRM). Responsibility for the provision of PRM support moves between airlines, the airport and public transport companies over the course of a journey. We work closely with our partners to provide seamless assistance to those who need additional help moving through the airport. We use a third-party company, Wilson James, to deliver our PRM support.

To ensure we keep learning, we run a regular accessibility focus group with our PRM service provider and representatives from a wide range of airport user groups. This includes the Alzheimer's Society, Hertfordshire Age UK, Action on Hearing Loss, Security Industry Association (SIA), Colostomy UK, Autism Bedfordshire, the Disability Resource Centre, diabetes charity JDRF, and Guide Dogs for the Blind. The group has met seven times since it was established in November 2019.

Our performance on PRM support is monitored by the CAA and is based on our performance data and airport assessments against standards set out in CAP1228, the CAA's quality standard for PRM support.

PROGRESS

LLA has made significant progress in meeting the requirements for the PRM support ranking, meeting three out of four target areas. However, we did not meet our target for pre-notified arriving guests, which requires at least 97% to be met within 20 minutes of arrival (chocks-on) for a 'good' rating. As a result, the airport was rated as 'Poor' in this category.

We firmly believe this result does not accurately represent the overall PRM provision at LLA. LLA has consistently ranked among the top-performing airports in the CAA's customer satisfaction survey, with our Special Assistance service receiving a rating of four out of five from guests. However, we fully acknowledge there is room for improvement, and our commitment to providing a simple and friendly experience for all guests remains unwavering.

We have continued working diligently with our service provider, Wilson James, to address the accessibility challenges posed by the COVID-19 pandemic and deliver ongoing service improvements. Several measures have been implemented, including the allocation of additional leadership resources, enhanced training programmes, regular stakeholder meetings, the planned roll-out of Disability Awareness training for all LLA employees and third parties, and the adoption of new technology for capturing more robust data.

We have also made significant improvements in meeting our target wait times, and we are confident these efforts will be reflected in future reports. Our goal is to achieve the highest rating in the PRM ranking, and we remain dedicated to continuously enhancing the experience for all guests with restricted mobility.

RELIGION AND SPIRITUALITY

We recognise the importance of religion and spirituality for many of our guests. To cater to their needs, we have designated spaces for prayer and reflection that are accessible to people of different faiths. Our chaplain works closely with local faith leaders to keep evolving the services we provide to so they are as inclusive as possible.

Hidden disabilities

Our team plays a vital role in making sure travelling through London Luton Airport is safe, accessible, simple and enjoyable for everyone. We provide all guest-facing employees with training on guest experience and hidden disabilities.

OUR HIDDEN DISABILITIES APPROACH

As part of our programme to ensure the airport is accessible to all, we have focused efforts on improving how we support guests with hidden disabilities.

Disability awareness has been included in both Ground Security Operative (GSO) initial training and annual recurrent training for airport employees. Our aim is to ensure all GSOs are familiar with and confident when dealing with people who face challenges using transportation, specifically aviation.

Both training courses include a dedicated Disability Awareness module. The main principles of this are::

- Define the terms 'disabled person' and 'persons with reduced mobility'.

- Identify guests' special needs during all aspects of the airport experience.

- Know how to apply search methods on persons with physical / hidden disabilities.

- Adaptation to specific needs to allow safe and secure travel for all guests.

- Demonstrate care, sensitivity and discretion.

PROGRESS

We had aimed to have all front-line employees trained on hidden disabilities by the end of 2020. Due to the pandemic, we could not progress as planned and fell behind on this metric. However, since the inception of the dedicated module, 94% of GSO employees have been trained. In 2023, we are rolling out bespoke training to more employees to help meet this target.

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
5.1	Customer experience training	Develop a facilitating talent strategy by the end of 2020, including entry-level talent. Support Luton Council with a financial commitment for their training academy. We will put in place measures that will double the number of apprenticeships by 2021.	Completed	COMPLETED 100% of LLAOL staff trained in the LLA Way in 2022.
5.2	Customer experience training	In partnership with the Prince's Trust deliver no less than two 'Get into Airports' programmes, each with 15 individuals or more, securing a 75% or higher positive outcome.	Completed	COMPLETED LLA Way Service Standard established in 2022.
5.3	Customer experience training	Achieve customer satisfaction score of 80% by the end of 2021 and 82% by the end of 2022.	Behind target	BEHIND TARGET 2021 - 83% 2022 - 80%
5.4	Training	Provide training to all LLA frontline staff on hidden disabilities by the end of 2020.	Behind target	BEHIND TARGET Disability Awareness Training is being developed for roll-out in 2023.
5.5	Accessibility	Achieve the highest rating of 'very good' in the CAA's Persons of Restricted Mobility (PRM) categorisation by the end of 2021.	Behind target	BEHIND TARGET CAA standards as set under CAP1228 were relaxed during the pandemic. These were reinstated in November 2021. LLA received a 'Poor' rating in the CAA interim report for 2022. This report was based on data captured between April 22 – September 22. Currently Oct – Feb 23 shows ECAC percentage has improved with December meeting 'GOOD'.
5.6	Accessibility	Establish our Accessibility Focus Group by the end of 2020.	Completed	COMPLETED Our Accessibility Focus Group (London Luton Airport Accessibility Forum - LLAAF) has met nine times since it was established in 2019. The forum members have participated in the design and operational readiness for the new Luton DART and feature in our new disability awareness training.
5.7	Accessibility	Gain certification to ACI's customer experience accreditation programme by the end of 2020.	Completed	COMPLETED LLA achieved Level 1 of the ACI Customer Experience Accreditation in January 2020. Progression to Level 2 is in progress for 2023.

Sustainable Supply Chain

Our influence stretches far beyond our own operations. Our supply chain includes hundreds of businesses that either work with us directly on-site or supply us with goods or services. Working with our supply chain partners will allow us to deliver greater impact.

IN THIS SECTION:

Highlights from 2022

53% of our procurement spending went on local suppliers

Ensuring we have a positive impact on the local economy.

Developed a Supply Chain Charter

Engaged with more than 40 suppliers to gain feedback and guidance.

Introduced newly designed uniforms

Sustainably sourced and designed in consultation with employees.

"I'm responsible for all procurement at the airport. I work with all departments to develop and embed sustainability considerations into the way we source goods, services, and works. This includes running capacity-building events for suppliers to help more local businesses succeed."

— **Terry Gittins, Head of Procurement**

⚙ Supplier management

Engaging our suppliers on environmental and social issues is a vital part of our Responsible Business Strategy (RBS). We recognise that a considerable proportion of our overall sustainability impacts, risks and opportunities lie within our suppliers' operations and we want to make sure we partner with organisations that share our values and can help us deliver our sustainability objectives. We also recognise that we can have a considerable positive impact on the local economy through our procurement decisions and by sharing knowledge and resources.

SUSTAINABILITY IN SUPPLIER SELECTION

We want to work with organisations that share our commitment to sustainability. We include a list of questions on environmental, social and governance issues in our tender process when selecting our supply chain partners.

OUR SUPPLIER SELECTION APPROACH

Sustainability requirements are embedded into our supplier selection process. Based on the size and nature of the contract, we include a set of scored questions to assess the quality of a potential suppliers' sustainability performance and how they are able to support our sustainability goals.

Through the tender process we seek assurances that suppliers comply with all applicable environmental and social legislation. We also score how a potential supplier will have a positive impact, including creating new local jobs, promoting diversity and reducing carbon emissions.

For specialist contractors, our sustainability team works closely with our procurement team to set appropriate requirements for tenders.

SUPPLIER CAPACITY BUILDING

OUR SUPPLIER CAPACITY BUILDING APPROACH

We want to work with existing and prospective suppliers to develop capabilities that will create greater value to us and their businesses. Our supply chain includes many small and local businesses, and we run programmes to help them win more work, develop new capabilities, and embed high standards of sustainability management in the way they operate.

We typically run workshops and training sessions, helping suppliers to understand our expectations and how they can be implemented within their businesses.

PROGRESS

In 2022, we embarked on our initiative to enhance the sustainability of our supply chain. We initiated our capacity-building programme, 'How to Tender for Contracts', which attracted the participation of 60 suppliers. To optimise our efforts and achieve economies of scale, we now organise two larger events annually.

In addition to fostering supplier relationships, LLA remains committed to making a positive impact on local communities. By donating the proceeds from ticket sales to these events, we raised £6,000 for our charity partners Luton Foodbank and the East Anglian Air Ambulance.

In 2022, we had planned to introduce a supplier toolkit aimed at assisting our supply chain partners in enhancing their own sustainability performance. Regrettably, the significant surge in workload that followed the COVID-19 pandemic hindered our ability to meet this target within the expected timeframe. We have set a revised target for completion in Q1 of 2024.

In 2022, we worked with students from the London School of Economics to produce a review of our procurement processes and supply chain impacts. We have implemented several recommendations from the review, including asking for better information on diversity factors during procurement.

OUR SUPPLY CHAIN EMISSIONS

At LLA, we are committed to supporting our suppliers in reducing their emissions. To further this goal, we engaged an independent consultancy to conduct a comprehensive analysis of the scope 3 emissions associated with the entire operations of LLA.

The findings revealed that supply chain activities contribute to 1% of our total scope 3 emissions, with 41% of that from purchased goods and services, and 59% from capital spending. 1% is from upstream transportation and distribution.

While our supply chain emissions are low compared to other scope 3 emissions (particularly aircraft and passenger surface access), we remain committed to working with our suppliers to reduce our collective carbon footprint. The analysis is an initial step towards tracking and addressing our supply chain emissions, enabling us to support our suppliers in their efforts to reduce their own carbon footprint.

We are refining our procurement strategy to prioritise sustainability in decision-making processes. Key elements of this strategy include ongoing monitoring of emissions, continual adjustment, and the establishment of carbon emission-related requirements within the tendering process. We will promote open dialogue with our current suppliers, offering advice and assistance to help them minimise their emissions.

By assessing, selecting and collaborating with our suppliers on their sustainability performance and facilitating their emission reduction efforts, we can establish a comprehensive framework for driving sustainability across our supply chain. This approach encompasses open communication, promoting strong relationships, and actively collaborating with suppliers to support their emission reduction initiatives.
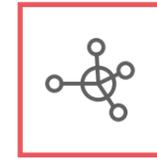
Engaging our supply chain partners

We engage our supply chain partners to help improve the airport's overall sustainability performance. We embed sustainability criteria in our tenders and contracts to demonstrate what we expect from our suppliers.

OUR APPROACH

We want to work with organisations that share our commitment to sustainability.

We aim to extend our environmental and social management across our supply chain. We have a Contractor Code of Practice, a Business Ethics Policy and sustainability is included on our risk register.

All tenders include general requirements relating to environmental management, social practices and impact, and governance. Where appropriate, specific sustainability management or performance requirements may be included in contracts.

Relevant sustainability targets are included in all contracts with a value over £25,000 and the team monitors the performance of key suppliers to ensure they continue to meet the agreed standards. All our contracts include human rights and slavery clauses. We also provide capacity development opportunities for suppliers and encourage local spending, as well as establishing climate change resilience plans.

In 2022, we began developing a Supplier Code of Conduct which sets out our requirements in relation to environmental management, responsible business and employment practices, and creating social value. We engaged with more than 40 suppliers and ran a workshop in October 2022 to gain feedback and guidance.

Our Sustainable Supply Chain Charter sets out the standards and principles for all airport operators, including all concessionaires, suppliers, and airlines, as well as the key sustainability focus areas we aim to deliver improvements in. We set out our requirements and aspirations for three areas of focus: Environment, Creating Social Value, and Responsible Business and Employer. We will work in collaboration with our supply chain partners to improve performance.

Case study

NEW EMPLOYEE UNIFORMS

LLA has recently redesigned its uniforms to consider the practicality and comfort of our employees, based on their feedback. One key piece of feedback was to ensure that all uniforms had pockets (previously, women's sizes did not have any). The new uniform design is not only more practical for employees, it is also made from more sustainable materials, such as organic cotton and recycled polyester, and sourced from a local manufacturer.

"Strong governance is at the heart of every responsible business. As a heavily regulated industry it's my role to ensure London Luton Airport has a robust framework in place so we can effectively manage our legal and regulatory obligations, while still delivering against our strategic plan."

— Mee-Ling Skeffington, General Counsel

Local spend

We are committed to using our influence to grow the local economy and aim to work with as many companies as possible within a 25-mile radius of the airport. To maintain and expand the great progress we have made in this area, we will maximise the opportunities for local organisations to work with the airport. We will do this by running training and capacity building events to overcome any barriers that might prevent local businesses from tendering.

OUR LOCAL SPEND APPROACH

We are committed to continuing to increase our local spend and to supporting local businesses, as we recognise the important role they play in the growth and sustainability of our community.

By prioritising local suppliers, we not only support the local economy, but also help to reduce our environmental impact by minimising the distance that goods and materials need to travel.

Additionally, our commitment to local suppliers helps to build strong and long-lasting relationships with our local community, which is an important part of our overall sustainability strategy.

Our approach to supporting local spend includes running capacity building events to help SMEs and local businesses understand our tender process. We recognise the value that local suppliers can bring through creating new jobs and reducing environmental impacts. A target update is due in 2023 in alignment with the new Responsible Business Strategy (RBS).

PROGRESS

In 2022, we increased the number of local suppliers we work with to more than 53% of our total spend. We recognise the role this plays in creating employment and helping money to stay within the local economy. This is a significant increase from the previous year, and is largely due to our concerted effort to support and engage with local suppliers.

To achieve this, we developed training programmes and workshops for prospective local suppliers to help them understand our tendering process and requirements. We also worked closely with Luton Council to identify and engage with local businesses that are well-suited to meet our procurement needs.

Climate change resilience

OUR CLIMATE CHANGE RESILIENCE APPROACH

The impacts of climate change will not just affect us, but our entire supply chain. We aim to work with suppliers and industry bodies to understand the key risks and impacts from climate change and to encourage mitigation.

PROGRESS

Due to the COVID-19 pandemic, we had to pause our work on the development of our supplier climate change resilience plan and on identifying strategic suppliers and assessing their exposure to climate risk. We aim to work on these activities with the sustainability team by the end of 2023.

PERFORMANCE AGAINST TARGETS

Target	Theme	Objective	Status	Progress update
6.1	Code of Conduct	Create supply chain sustainability Code of Conduct and standards by the end of 2020.	In progress	**IN PROGRESS** In 2022 we began developing further sustainability-themed documents which will be used to support the latest version of the Supplier Code of Conduct.
6.2	Sustainability in contracts	75% of supplier contracts by spend to include sustainability objectives by December 2020.	Completed	**COMPLETED** All contracts with a value over £25k include sustainability objectives.
6.3	Supplier capacity building	Sustainable supply chain toolkit for suppliers in place by December 2022.	In progress	**IN PROGRESS** The procurement team has taken steps to measure sustainability within the supply chain starting with Real Living Wage, local supplier content & equality. A broader toolkit will be developed Q4 2023/Q1 2024 when a contracts management team is established within LLA.
6.4	Supplier capacity building	Undertake capacity building events for suppliers each year: six in 2020, eight in 2022.	In progress	**IN PROGRESS** Was paused due to the pandemic. LLA attended two events at the end of 2022 and will host another called "How to bid for contracts" in March 2023. This event is equivalent to three of our former capacity building events due to the number of supplier attendees. In 2023, we will be helping Luton Council, the University of Bedfordshire and other organisations in their supplier capacity building events.
6.5	Local spend	Maintain at least 25% of total supply chain spend with suppliers based within a 20-mile radius of the airport, and provide support for local organisations to maximise opportunities to work with the airport.	Completed	**COMPLETED** 53% of supplier spend is with local suppliers (based within a 25 mile radius).
6.6	Climate change risk	Identify strategic suppliers and assess the climate change risks for these suppliers by the end of 2021.	Behind target	**BEHIND TARGET** We plan to engage with the sustainability team on this by the end of 2023.
6.7	Climate change risk	Develop a supplier climate change resilience plan by 2023.	Behind target	**BEHIND TARGET** We plan to engage with the sustainability team on this by the end of 2023.

Sustainability governance

As an organisation with less than 1,000 employees, we strive to optimise our resources, attract talented individuals and remain adaptable. Our Responsible Business Strategy (RBS) is woven into our operations, with each department taking charge of essential activities. Our central sustainability team provides support, while a new Sustainability Board Committee oversees our progress.

With the growth of our airport and the associated responsibilities, we recognise the need to expand and restructure our sustainability team. This way, we can implement our strategy and achieve our 2040 Net Zero objective.

ACCOUNTABILITY

The RBS has a clear set of priorities, with objectives and actions to deliver. Each set of targets has an implementation plan that the business takes ownership for, and which is supported through a governance and management structure.

The ultimate owner of the RBS is our CEO and Management Board.

In 2021, we established a Sustainability Committee (SusCo) whose purpose is to review and advise the Board appropriately on the practices and performance of the Group in relation to sustainability.

The SusCo meets quarterly and is chaired by Amparo Brea, Chief Green Officer at Aena, the airport's major shareholder. It comprises representatives from LLA (CEO, CFO, Director of Corporate Affairs, Operations Director, General Counsel and Head of Sustainability) and from shareholders Aena and InfraBridge.

Key agenda items throughout the year included:

- Developing and agreeing the Net Zero roadmap
- Overseeing extensive work to develop on-site renewables, from feasibility to the initial development work
- Planning to replace our fleet with electric and low carbon vehicles
- Planning how to develop the airport to align with the draft, legally-binding Green Controlled Growth proposals linked to the Development Consent Order application by Luton Rising
- Monitoring policy developments, particularly the UK Government's Jet Zero Strategy, and implications for our strategy
- Oversight of Supply Chain Charter development
- Overseeing the community programme and Community Trust Fund grant allocation

In addition there are quarterly meetings with Luton Council and airport owner, Luton Rising (LR) on the long term sustainability of the airport, with LR's CEO, and LLA's CEO, Head of Sustainability and Director of Corporate Affairs.

We have a central sustainability team, which is directly responsible for our Community and Environmental programmes. The team support functions and departments across the business to deliver their targets, objectives and action plans.

Meetings with operational teams are held across the year via:

- Risk and sustainability meetings
- Executive leadership sessions
- Senior leadership team meetings

All executives have sustainability targets that are linked to our 2040 Net Zero roadmap. Their remuneration is linked to the achievement of these targets.

RBS GOVERNANCE

Our governance structure is designed to oversee our approach to responsible business:

- A key part of the governance structure is an annual review, which looks at the progress of the strategy and identifies opportunities for improvement.
- We include a section on responsible business performance in our annual reports to keep our stakeholders informed.
- We publish a dedicated, annual sustainability report, reporting on progress against our RBS targets and drawing on key metrics from theGlobal Reporting Initiative (GRI) and sector supplement guidance.

GOVERNANCE STRUCTURE

The governance structure is as follows:

- CEO
- Sustainability board committee
- Executive Leadership Team
- Senior Management Team
- Risk Committee
- Team meetings

POLICIES

The Responsible Business Strategy implementation plan includes the development of a series of guiding policies and corresponding strategies, which are owned and implemented by LLA. We have continued to implement and update the following policies as needed:

1. Surface Access Plan, refreshed in 2019
2. Energy Plan, refreshed in 2021
3. Environmental Management Plan, refreshed in 2021
4. Noise Action Plan, updated and launched in 2019
5. Equality, Diversity and Inclusion Strategy, refreshed in 2022
6. Health, Safety and Wellbeing Strategy, will be refreshed by 2023
7. Community Investment Strategy, refreshed in 2019
8. Passenger Satisfaction Strategy, launched in 2019
9. Employee Engagement and Communications Strategy, launched in 2019
10. Hybrid working policy, launched in 2021

"My role is focused on embedding sustainability in every aspect of the organisation. In 2022 we continued to work alongside London Luton Airport to both shape and deliver on its sustainability commitments, as we work towards achieving Net Zero Carbon by 2040 across all our airports. We have established a new sustainability committee, which meets every quarter to exchange knowledge and expertise from across our network of airports, and support LLA in achieving its key targets, strengthening the link between strategic decision making and operational management."

— **Amparo Brea Álvarez, Green Chief Officer, Aena**
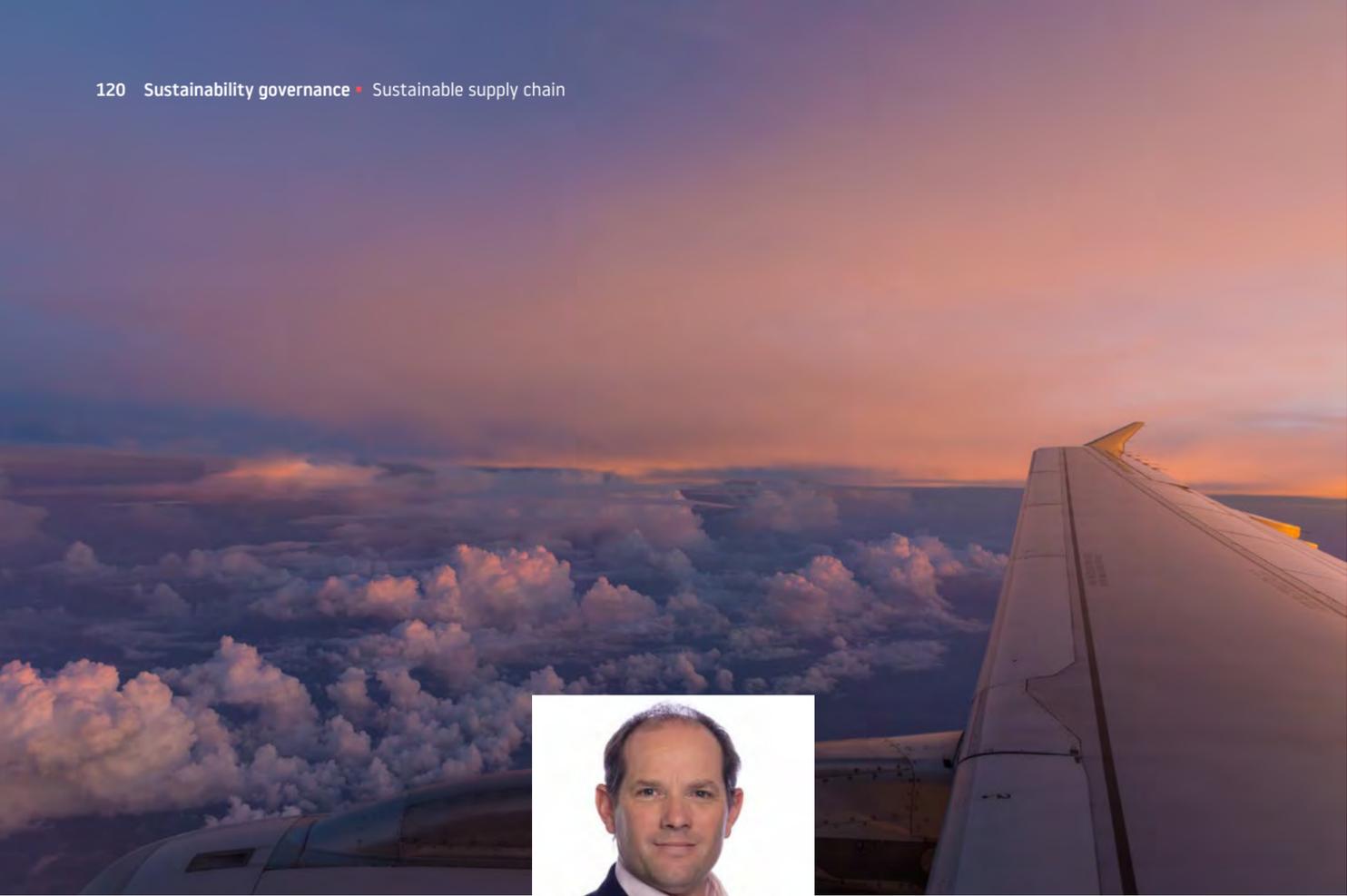
GRESB

In 2022, LLA was ranked as the best performing UK airport for sustainability governance and disclosure, achieving a five-star rating in the Global Real Estate Sustainability Benchmark (GRESB) assessment.

GRESB is an international sustainability framework that benchmarks the environmental, social and governance (ESG) management and performance of major infrastructure assets worldwide.

GRESB Sector Leaders are recognised as the best performers by sector, region and nature of ownership across the GRESB assessment.

Underlining its commitment to playing a leading role in making aviation sustainable, LLA was named as a GRESB Infrastructure Sector Leader, as well as 'Most Improved' in the Transport: Airport Companies category.

"As a shareholder in the airport, we work closely with the team at LLA via its sustainability committee. We saw the airport continue to make good progress on sustainability as it developed its roadmap to Net Zero carbon emissions. We are pleased to see the capacity and maturity of the sustainability team develop and good progress made in tackling key material sustainability issues.

In 2022, London Luton Airport was awarded the highest possible GRESB score, a great achievement and marker of its high ESG performance in relation to industry peers."

— **Graeme Ferguson, Investment Director, Infabridge**

FOCUS IN 2023

NEW SUSTAINABILITY STRATEGY

Work on developing our Responsible Business Strategy started in 2017. It was our first sustainability strategy and brought all our environmental, social and responsible business programmes together for the first time. In some areas we already had mature programmes in place and for others, we were starting from scratch. As such, many of our objectives focused on incremental change or establishing a firm foundation.

Since the inception of our strategy, a lot has changed. We have expanded our sustainability team and our capacity to deliver improvements. The aviation sector has undergone notable shifts due to the COVID-19 pandemic. And there has been a substantial change in sustainability expectations for airports.

As such, we will develop a new sustainability strategy in 2023. The new strategy will recalibrate our level of ambition and action. We have already set the foundation for discovery and basis for our new strategy, and we are now moving forward with the important work of delivery and implementation.

We recognise that the success of our new strategy will depend on our ability to involve and communicate with important stakeholder groups. To that end, we will be actively seeking their valuable feedback and input to ensure that our new strategy aligns with their expectations and remains future proof.

FINANCE

COVENANT WAIVERS

LLA successfully exited covenant waivers in June 2022, which restored a normal relationship with its banking partners.

To ensure that borrowers are able to repay their loans, banks typically administer quarterly or bi-annual tests. Failure to meet these tests may result in the penalties or a reduction in available liquidity.

Due to COVID-19, LLA was required to negotiate amended covenant tests with lenders, but since its financial position has improved these have reverted to normal. The airport has fully repaid its £80m Revolving Credit Facility and accelerated and completed its defined benefit pension deficit payments. This demonstrates that LLA is in a good financial position overall.

"Over the last year I have seen the airport make a strong recovery from the challenges posed by COVID-19 and return to a stable financial position. LLA's strong commitment to sustainability reflects our desire to do the right thing, to help deliver Net Zero, plus it underpins our plans to grow the airport".

— **Richard Mccord, Chief Financial Officer, LLA**

GRI INDEX

This Report includes standard disclosures from the Global Reporting Initiative (GRI) Standards. This index sets out the indicators we have and have not included, and those that are not material to LLA, and where we have provided partial information from a particular disclosure.

Key						
Y	Reported	P	Partially reported	N	Not reported	

Disclosure	Reported	Page number
GRI 2: General Disclosures 2021		
2-1 Organizational details	Y	5, 9, 178
2-2 Entities included in the organization's sustainability reporting	P	5
2-3 Reporting period, frequency and contact point	P	5
2-4 Restatements of information	N	-
2-5 External assurance	N	-
2-6 Activities, value chain and other business relationships	Y	7-9, 19
2-7 Employees	P	93-94
2-8 Workers who are not employees	N	-
2-9 Governance structure and composition	Y	93, 118-119
2-10 Nomination and selection of the highest governance body	N	-
2-11 Chair of the highest governance body	Y	118
2-12 Role of the highest governance body in overseeing the management of impacts	Y	118-119
2-13 Delegation of responsibility for managing impacts	Y	118-121
2-14 Role of the highest governance body in sustainability reporting	Y	118-119
2-15 Conflicts of interest	N	-
2-16 Communication of critical concerns	N	-
2-17 Collective knowledge of the highest governance body	P	78-79, 90
2-18 Evaluation of the performance of the highest governance body	N	-
2-19 Remuneration policies	P	118
2-20 Process to determine remuneration	P	118
2-21 Annual total compensation ratio	N	-
2-22 Statement on sustainable development strategy	Y	6-7
2-23 Policy commitments	Y	119
2-24 Embedding policy commitments	Y	7, 118-119
2-25 Processes to remediate negative impacts	N	-
2-26 Mechanisms for seeking advice and raising concerns	Y	47
2-27 Compliance with laws and regulations	P	48-51
2-28 Membership associations	Y	28-29
2-29 Approach to stakeholder engagement	Y	119
2-30 Collective bargaining agreements	N	-

Disclosure	Reported	Page number
GRI 3: Material Topics 2021		
3-1 Process to determine material topics	Y	14-17
3-2 List of material topics	Y	14
3-3 Management of material topics	Y	18-121
GRI 201: Economic Performance 2016		
201-1 Direct economic value generated and distributed	P	94-95, 168
201-2 Financial implications and other risks and opportunities due to climate change	P	33, 113
201-3 Defined benefit plan obligations and other retirement plans	P	121
201-4 Financial assistance received from government	N	-
GRI 202: Market Presence 2016		
202-1 Ratios of standard entry level wage by gender compared to local minimum wage	P	94-95
202-2 Proportion of senior management hired from the local community	N	-
GRI 203: Indirect Economic Impacts 2016		
203-1 Infrastructure investments and services supported	Y	35-36
203-2 Significant indirect economic impacts	Y	116
GRI 204: Procurement Practices 2016		
204-1 Proportion of spending on local suppliers	Y	116-117
GRI 205: Anti-corruption 2016		
205-1 Operations assessed for risks related to corruption	N	-
205-2 Communication and training about anti-corruption policies and procedures	N	-
205-3 Confirmed incidents of corruption and actions taken	N	-
GRI 206: Anti-competitive Behavior 2016		
206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	N	-
GRI 207: Tax 2019		
207-1 Approach to tax	N	-
207-2 Tax governance, control, and risk management	N	-
207-3 Stakeholder engagement and management of concerns related to tax	N	-
207-4 Country-by-country reporting	N	-
GRI 301: Materials 2016		
301-1 Materials used by weight or volume	N	-
301-2 Recycled input materials used	N	-
301-3 Reclaimed products and their packaging materials	N	-
GRI 302: Energy 2016		
302-1 Energy consumption within the organization	Y	30-31
302-2 Energy consumption outside of the organization	Y	30-31
302-3 Energy intensity	Y	30-31
302-4 Reduction of energy consumption	Y	30-31
302-5 Reductions in energy requirements of products and services	Y	30

Disclosure	Reported	Page number
GRI 303: Water and Effluents 2018		
303-1 Interactions with water as a shared resource	Y	40
303-2 Management of water discharge-related impacts	P	53
303-3 Water withdrawal	Y	40-41
303-4 Water discharge	N	-
303-5 Water consumption	Y	40-41
GRI 304: Biodiversity 2016		
304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	P	76-77
304-2 Significant impacts of activities, products and services on biodiversity	P	76-77
304-3 Habitats protected or restored	N	-
304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	P	76-77
GRI 305: Emissions 2016		
305-1 Direct (Scope 1) GHG emissions	Y	24-25
305-2 Energy indirect (Scope 2) GHG emissions	Y	24-25
305-3 Other indirect (Scope 3) GHG emissions	Y	24-26, 176-177
305-4 GHG emissions intensity	Y	24-25
305-5 Reduction of GHG emissions	Y	24-25
305-6 Emissions of ozone-depleting substances (ODS)	N	-
305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Y	42-43
GRI 306: Waste 2020		
306-1 Waste generation and significant waste-related impacts	Y	38-39
306-2 Management of significant waste-related impacts	Y	38-39
306-3 Waste generated	Y	38-39
306-4 Waste diverted from disposal	Y	38-39
306-5 Waste directed to disposal	Y	38-39
GRI 308: Supplier Environmental Assessment 2016		
308-1 New suppliers that were screened using environmental criteria	P	113-115
308-2 Negative environmental impacts in the supply chain and actions taken	P	113-116
GRI 401: Employment 2016		
401-1 New employee hires and employee turnover	P	77
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Y	90
401-3 Parental leave	N	-
GRI 402: Labor/Management Relations 2016		
402-1 Minimum notice periods regarding operational changes	N	-

Disclosure	Reported	Page number
GRI 403: Occupational Health and Safety 2018		
403-1 Occupational health and safety management system	Y	78
403-2 Hazard identification, risk assessment, and incident investigation	P	75-80
403-3 Occupational health services	Y	75-80
403-4 Worker participation, consultation, and communication on occupational health and safety	Y	75
403-5 Worker training on occupational health and safety	Y	75-80
403-6 Promotion of worker health	Y	78-79
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Y	75-80
403-8 Workers covered by an occupational health and safety management system	P	78
403-9 Work-related injuries	P	80
403-10 Work-related ill health	P	80
GRI 404: Training and Education 2016		
404-1 Average hours of training per year per employee	N	-
404-2 Programs for upgrading employee skills and transition assistance programs	P	78-82
404-3 Percentage of employees receiving regular performance and career development reviews	N	-
GRI 405: Diversity and Equal Opportunity 2016		
405-1 Diversity of governance bodies and employees	Y	93
405-2 Ratio of basic salary and remuneration of women to men	Y	94
GRI 406: Non-discrimination 2016		
406-1 Incidents of discrimination and corrective actions taken	N	-
GRI 407: Freedom of Association and Collective Bargaining 2016		
407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	N	-
GRI 408: Child Labor 2016		
408-1 Operations and suppliers at significant risk for incidents of child labor	N	-
GRI 409: Forced or Compulsory Labor 2016		
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	N	-
GRI 410: Security Practices 2016		
410-1 Security personnel trained in human rights policies or procedures	N	-
GRI 411: Rights of Indigenous Peoples 2016		
411-1 Incidents of violations involving rights of indigenous peoples	N	-
GRI 413: Local Communities 2016		
413-1 Operations with local community engagement, impact assessments, and development programs	P	60-69
413-2 Operations with significant actual and potential negative impacts on local communities	P	44-47
GRI 414: Supplier Social Assessment 2016		
414-1 New suppliers that were screened using social criteria	N	-
414-2 Negative social impacts in the supply chain and actions taken	N	-
GRI 415: Public Policy 2016		
415-1 Political contributions	N	-

Disclosure	Reported	Page number
GRI 416: Customer Health and Safety 2016		
416-1 Assessment of the health and safety impacts of product and service categories	Y	76-80
416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Y	76-80
GRI 417: Marketing and Labeling 2016		
417-1 Requirements for product and service information and labeling	N	-
417-2 Incidents of non-compliance concerning product and service information and labeling	N	-
417-3 Incidents of non-compliance concerning marketing communications	N	-
GRI 418: Customer Privacy 2016		
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	P	82-83
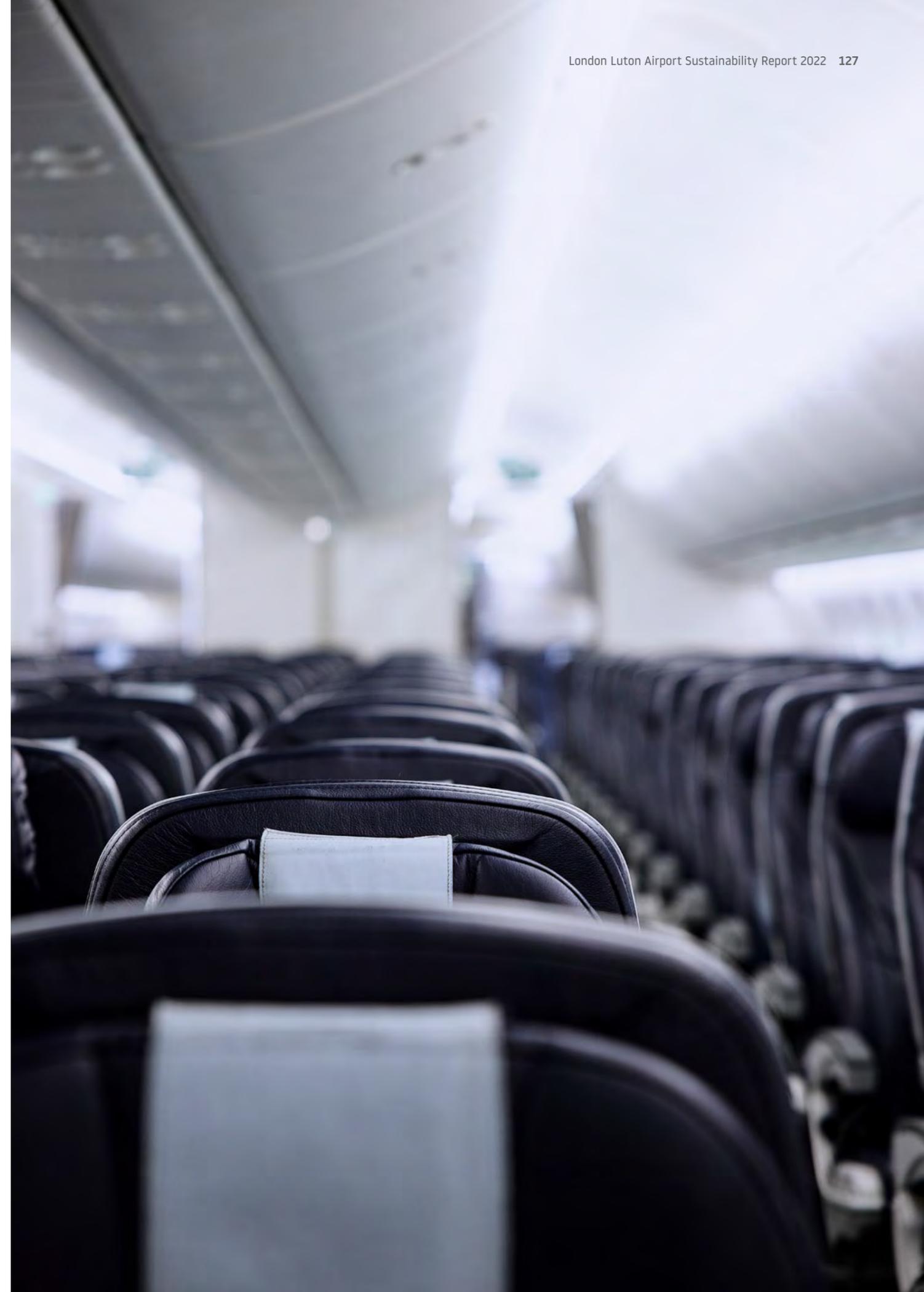
Supporting data

The data below was previously presented in
the Annual Monitoring Report, but has now
been combined with the Sustainability Report.

Appendix 1: Aircraft Chapters

FIGURE 1: PERCENTAGE OF AIRCRAFT OF EACH CHAPTER OPERATING AT THE AIRPORT

	Number of aircraft which are Chapter 3	9,564
	Number of aircraft which are Chapter 4	86,416
	Number of aircraft which are Chapter 14	47,705
	Others	864
	Total	**144,549**

0.60%
6.62%
33.00%
59.78%
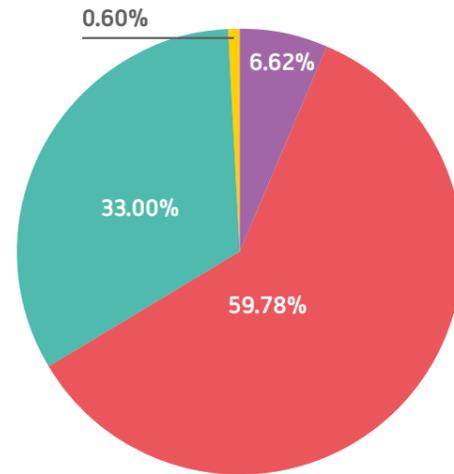
Appendix 2: Noise and Track Violations

TABLE 1: NUMBER OF TRACK VIOLATIONS BY MONTH AND AIRCRAFT TYPE

Month	Number of track violations	Total fines by month	Aircraft types violating
Jan-22	2	£2,000	C56X; GLF6
Feb-22	3	£3,000	A306; E35L; E545
Mar-22	6	£10,000	A20N; A21N; B752; GA6C; GALX; GLF6
Apr-22	3	£4,000	C550; GLEX; GLF6
May-22	5	£6,000	C550; C56X; CRJ2; GLF5; GLF6
Jun-22	2	£3,000	C650; CL60
Jul-22	10	£10,000	A319; B738; E135; F2TH; GLEX; GLF4; GLF6
Aug-22	3	£3,000	E135; GLF5; GLF6
Sep-22	6	£6,000	C25C; C500; CL60; GLF4; GLF6
Oct-22	0	-	-
Nov-22	2	£2,000	F2TH; H25+
Dec-22	6	£8,000	B752; C650; CRJ2; E135; E55P
Total	**48**	**£57,000**	**-**

TABLE 2: DAY AND NIGHT NOISE VIOLATION INFORMATION

Month	Number of night noise violations	Number of day noise violations	Total noise violations	Total fines by month	Aircraft types violating
Jan-22	0	0	0	-	-
Feb-22	1	0	1	£1,000	MD87
Mar-22	0	0	0	-	-
Apr-22	0	0	0	-	-
May-22	0	0	0	-	-
Jun-22	0	0	0	-	-
Jul-22	0	1	1	£2,000	B738
Aug-22	0	0	0	-	-
Sep-22	0	0	0	-	-
Oct-22	0	0	0	-	-
Nov-22	0	0	0	-	-
Dec-22	0	0	0	-	-
Total	**1**	**1**	**2**	**£3,000**	**-**

Appendix 3: CDA Compliance

TABLE 3: CDA COMPLIANCE (%) BY OPERATOR

CDA compliance by aircraft operator		
Operators	No. of arrivals	% of CDA compliance
easyJet	17,707	96%
Wizz Air	17,411	94%
Blue Air	418	97%
Ryanair	6,208	99%
European Air Transport	932	91%
TUI	491	97%
El Al	287	87%
MNG Airlines	107	96%
London Executive Aviation	344	90%
VistaJet	937	82%
NetJets	1,547	84%
Others	12,410	79%
All	58,799	92%

Appendix 4: Complaints Data

TABLE 4: NUMBER OF NOISE COMPLAINTS AND COMPLAINANTS FOR 2022

Month	No. specific complaints	No. of general complaints	Total complaints	No. complainants
Jan-22	67	21	88	24
Feb-22	45	16	61	27
Mar-22	629	61	690	53
Apr-22	163	60	223	67
May-22	218	91	309	94
Jun-22	623	138	761	135
Jul-22	2,431	164	2,595	181
Aug-22	2,248	229	2,477	214
Sep-22	991	116	1,107	110
Oct-22	1,189	83	1,272	92
Nov-22	561	58	619	47
Dec-22	399	75	474	57
Total	9,564	1,112	10,676	647

* At the request of NTSC, one complainant who made 8,829 complaints in 2022, has been omitted from these data tables

TABLE 5: COMPARISON OF COMPLAINT AND COMPLAINANT DATA FOR 2021 – 2022

	2021	2022	% change
Total No. of Complaints relating to LLA aircraft operations	12,432	96%	14% decrease
No. of Complainants	289	94%	281% increase
No. of General Complaints	412	97%	170% increase
No. of Specific Complaints	12,020	99%	53% increase
Average No. of Complaints per Complainant	43.0	91%	58% decrease
No. of Aircraft Movements per Complaint	5.1	92%	18% increase

* At the request of NTSC, one complainant who made 8,829 complaints in 2022, has been omitted from these data tables

TABLE 6: OVERVIEW OF COMPLAINTS DATA

Number of individuals contacting the airport only once	359
% contacting the airport only once	33%
Number of individuals reporting concerns for the first time	411
% of complaints from 20 individuals	79.8%
Number of complaints concerning night noise	542
Number of specific complaints concerning night noise disturbance from LLA	466
Main source of complaints (e.g. West arr, dep, east arr or deps)	Westerly Arrivals
5 Top locations for complaints	Sandy Wheathampstead Harpenden St Albans Gamlingay

TABLE 7: TOTAL AIRCRAFT MOVEMENT OVERVIEW

Total aircraft movements	118,060
Number of passenger movements	84,965
Number of cargo movements	1,635
Number of positioning movements	1,325
Number of non-commercial movements	30,135

TABLE 8: NON-COMMERCIAL AIRCRAFT MOVEMENT OVERVIEW

Breakdown of non-commercial movements	
General aviation	84,965
Military	1,635
Official	1,325
Other	30,135
Test & Training	33

TABLE 9: TOTAL PASSENGER OVERVIEW

Number of domestic passengers	1,035,116
Number of international passengers	12,101,176

TABLE 10: AVERAGE AIRCRAFT MOVEMENT BY HOUR

Hour	Average hourly arrivals	Average hourly departures	Average hourly movements
00:00-00:59	5	1	6.8
01:00-01:59	5	1	5.5
02:00-02:59	2	1	3.0
03:00-03:59	1	0	1.8
04:00-04:59	1	1	1.7
05:00-05:59	0	1	1.3
06:00-06:59	1	12	12.8
07:00-07:59	11	13	24.6
08:00-08:59	8	13	20.1
09:00-09:59	5	13	18.4
10:00-10:59	5	9	13.9
11:00-11:59	7	7	13.8
12:00-12:59	10	8	17.8
13:00-13:59	10	9	19.4
14:00-14:59	9	10	18.4
15:00-15:59	8	9	17.2
16:00-16:59	8	9	17.1
17:00-17:59	10	8	17.5
18:00-18:59	9	8	17.2
19:00-19:59	10	7	17.1
20:00-20:59	9	8	16.7
21:00-21:59	10	5	15.1
22:00-22:59	9	6	15.4
23:00-23:59	8	3	10.9

TABLE 11: CARGO OVERVIEW

	Day Movements	Night movements	Total	Tonnes
2022	894	1,333	2,227	32,001
2021	709	1,317	2,026	26,430
2022/2021 comparison	+26%	+1%	+10%	+21%

Appendix 6: Movement by Aircraft Type

TABLE 12: MOVEMENT BY AIRCRAFT TYPE OVERVIEW

Aircraft Type Movements % of Total movements		
Aircraft type	Movements	% of total movements
A306	1,082	0.9%
Airbus A319	13,527	11.5%
Airbus A320	26,287	22.3%
Airbus A320 NEO	9,973	8.4%
Airbus A321	12,068	10.2%
Airbus A321 NEO	9,010	7.6%
Airbus A330	128	0.1%
Beechcraft Twin Turboprop	643	0.5%
Boeing B737-300	20	0.0%
Boeing B737-400	30	0.0%
Boeing B737-500	38	0.0%
Boeing B737-700	166	0.1%
Boeing B737-800	13,927	11.8%
Boeing B737-900	302	0.3%
Boeing B737 Max 8	942	0.8%
Boeing B757	1,022	0.9%
Boeing B767	10	0.0%
Boeing B777	-	0.0%
Boeing B787	30	0.0%
Canadair Global Express GLEX	4,209	3.6%
Cessna Citation Family	5,915	5.0%
Canadair Challenger Family	2,576	2.2%
Dassault Falcon FA7X	979	0.8%
Embraer Legacy 450-650 series	1,378	1.2%
Embraer ERJ-135	1,161	1.0%
Learjet Family	732	0.6%
Gulfstream 3, 4 & 400 series GLF3/GLF4	755	0.6%
Gulfstream 5 and 500 series GLF5	1,387	1.2%
Gulfstream 650 GLF6	2,142	1.8%
Helicopters	328	0.3%
Pilatus PC-12	418	0.4%
Other aircraft	6,875	5.8%
TOTAL	**118,060**	**100%**

TABLE 13: MOVEMENT BY OPERATOR OVERVIEW

Operators	Movements
easyJet	33,869
Wizz Air	34,579
Ryanair	12,363
Blue Air	836
DHL	1,392
MNG Airlines	214
TUI Airways	816
Fly One	220
Others	2,311
Total	86,600

Appendix 7: Night Quota

TABLE 14: NIGHT AND EARLY MORNING MOVEMENTS OVERVIEW

	Night Quota Period (23:30-05:59)		Early morning shoulder (06:00-06:59)
	Movements limited to 9,650	Quota Count limited to 3,500	Movements limited to 7,000
Jan-22	325	106.750	238
Feb-22	364	112.625	247
Mar-22	426	122.750	354
Apr-22	788	237.000	501
May-22	984	264.125	494
Jun-22	1,023	325.000	442
Jul-22	1,101	366.000	415
Aug-22	989	327.125	442
Sep-22	981	319.500	419
Oct-22	1,059	319.375	503
Nov-22	447	140.250	303
Dec-22	670	207.750	308
Total	**9,157**	**2848.250**	**4,666**

The only aircraft movement classified as QC 2 in 2022 was a departure by an Airbus A321 aircraft. Certification data for this specific aircraft was not available and therefore a worst case assumption was made, this operated in April 2022. There were no night time aircraft movements with a QC value of greater than 2 in 2022.

TABLE 15: DAY AND NIGHT MOVEMENT OVERVIEW

	Day movements (0700-2259)	Night Movements (2300-0659)		
	Day movements	Night quota period (2330-0559)	Early morning shoulder period (0600-0659)	Total night movements (2300-0659)
Departures	51,927	2020	4466	7,102
Arrivals	50,174	7137	200	8,857
Total	**102,101**	**9,157**	**4,666**	**15,959**

Appendix 8: Correlated Noise Events

TABLE 16: DAYTIME AND NIGHT-TIME NOISE EVENTS BY SOUND INTENSITY (DB)

dB (A)*	Daytime	Night-Time	Total
<70	6,967	969	7,936
70	2,292	347	2,639
71	4,005	527	4,532
72	6,338	785	7,123
73	7,587	1,128	8,715
74	6,555	1,120	7,675
75	4,217	603	4,820
76	2,240	362	2,602
77	980	159	1,139
78	428	93	521
79	154	24	178
80	59	1	60
81	0	0	0
82	0	0	0
83	0	0	0
84	1	0	1
85	0	0	0
86	0	0	0
87	0	0	0
88	0	0	0
89	0	0	0
90	0	0	0

FIGURE 2: YEAR ON YEAR COMPARISON OF TOTAL NOISE EVENTS.

Year on Year Comparison (Total)
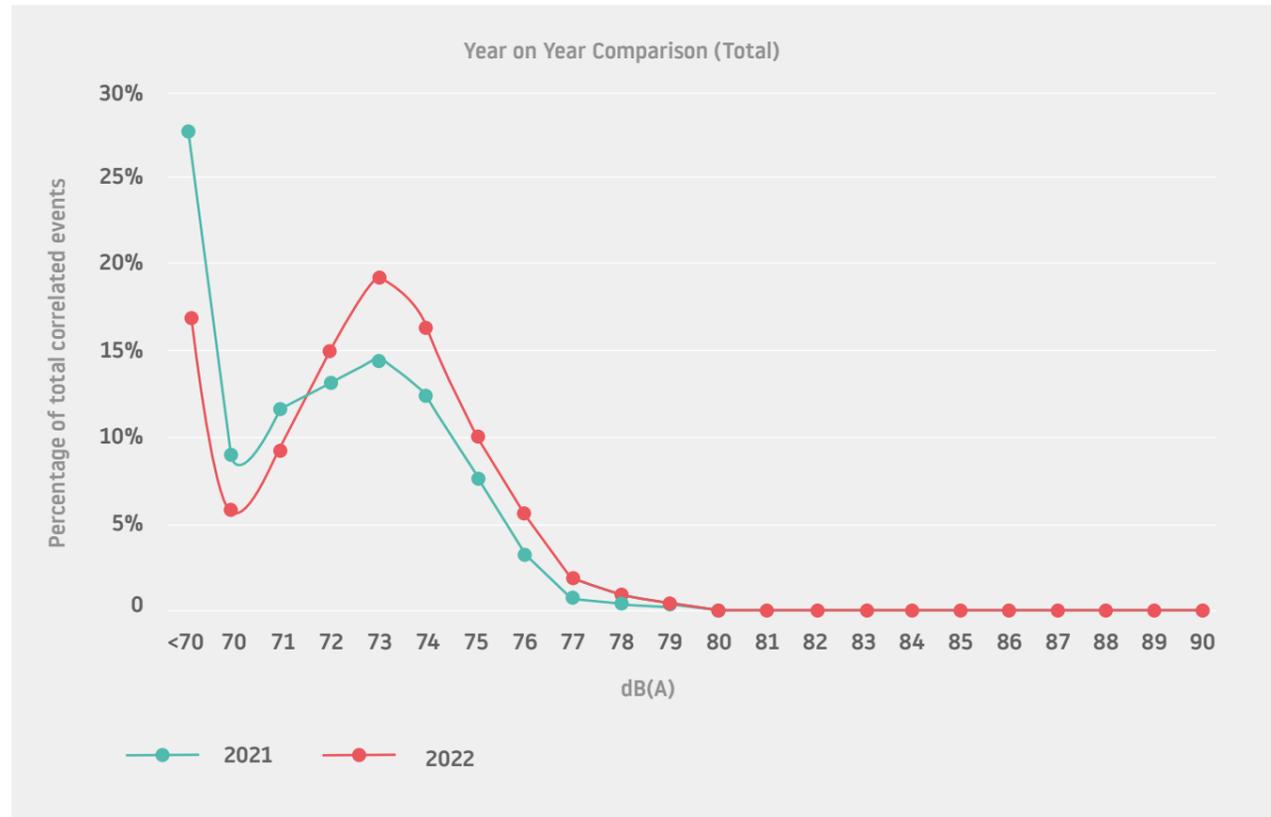
TABLE 17: NOISE INSULATION INVESTMENT OVERVIEW

Total amount invested	£484,383
Number of properties insulated	114
Number of properties contacted	932

Appendix 10: Contour plans

ACTUAL 2022 SUMMER NOISE CONTOURS

1.0 INTRODUCTION

When planning permission was given in 2014 for development at Luton Airport (Application No: 12/01400/FUL) a number of conditions were imposed. Condition 12 required that daytime and night-time contours are produced on an annual basis, for the previous summer period based on actual ATM data, and for the following summer period based on predicted ATM data. The areas of these contours are to be compared to the limits contained in Condition 12.

London Luton Airport Operations Limited (LLAOL) have retained Bickerdike Allen Partners LLP(BAP) to produce airborne aircraft noise contours for the 92 day summer period based on the actual movements for 2022.

The contours for 2022 provide part of the information required to comply with Condition 12.

2.0 CONTOUR PRODUCTION

Aircraft movement data for use in the contour production has been supplied by LLAOL. In the summer period four flights associated with the Women's Euro 2022 football tournament and two flights associated with the Queen's funeral were subject to a dispensation and have therefore not been included in the 2022 summer contours.

The 2022 contour production methodology has been updated from that used for the 2021 contours. It retains the inclusion of terrain, and the use of the INM software (Version 7.0d), but the validation has been updated. The validation is now based on measured results from the fixed noise monitors in 2021, and the departure profiles for key aircraft types have been updated based on radar data.

2.0 RUNWAY USAGE

The 2022 contours are based on the actual runway usage in 2022, which is shown in Table 1 below. The 2021 contours, which are included for comparison, are based on the actual runway usage in 2021.

3.0 NOISE CONTOUR RESULTS

The noise contours for 2022 are shown in the attached Figures A11060-N77-01 and A11060-N77-02. They are presented at values from 57 to 72 dB L$_{Aeq,16h}$ (daytime) and 48 to 69 dB L$_{Aeq,8h}$ (night-time). The area of each contour is given in Table 2 (daytime) and Table 3 (night-time), and compared with the corresponding 2021 contour.

The 57 dB LAeq,16h (daytime) noise contours for 2021 and 2022 are compared in Figure A11060-N77-03. The 48 dB L$_{Aeq,8h}$ (night-time) noise contours for 2021 and 2022 are compared in Figure A11060-N77-04.

The 2022 57 dB daytime contour is around 23% larger than the equivalent 2021 contour. This is due to an increase in the number of daytime movements in 2022 compared to 2021. The 2022 57 dB L$_{Aeq,16h}$ contour area is less than the airports current contour area limit of 19.4 km².

The 2021 48 dB night-time contour is around 38% bigger than the equivalent 2021 contour. This is due to an increase in the number of night-time movements in 2022 compared to 2021. The 2022 48 dB LAeq,8h contour area is less than the airports current contour area limit of 37.2 km².

The proportion of movements by quieter modernised aircraft in 2022 remained similar to 2021.

The daytime and night-time contours for 2022 are a different shape than the 2021 contours, largely due to a change in the runway modal split. 35% of movements conducted easterly operations (used Runway 07) in summer 2022 compared to 49% in summer 2021.

Compared to the 2021 contours, the 2022 57 dB daytime contours are similar in relation to Caddington, but are wider to the west of the airport, and larger to the south-west. To the east of the airport the 2022 daytime contour is initially slightly narrower but it extends further than that for 2021.

The 2022 48 dB night-time contour extends further than that for 2021 to the west, south-west and east of the airport. It is also generally wider than the 2021 contour, except immediately to the north and south of the airport, where the 2022 contour is narrower.

TABLE 18: 2021 AND 2022 SUMMER MODAL SPLIT

Year	% of Summer Movements	
	Runway 07	Runway 25
2021 Actual	49%	51%
2022 Actual	35%	65%

TABLE 19: AREA OF DAYTIME SUMMER NOISE CONTOURS, 2021 AND 2022

Contour Value (dB LAeq,16h)	Contour Area (km²)	
	2021	2022
57	10.9	13.4
60	6.3	7.3
63	3.3	4.2
66	1.7	2.1
69	1.1	1.2
72	0.7	0.7

TABLE 20: AREA OF NIGHT-TIME SUMMER NOISE CONTOURS, 2021 AND 2022

Contour Value (dB LAeq,16h)	Contour Area (km²)	
	2021	2022
48	23.9	33.0
51	13.7	18.5
54	8.1	9.7
57	4.4	5.6
60	2.2	3.1
63	1.3	1.5
66	0.8	0.9
69	0.5	0.5

4.0 DWELLING AND POPULATION COUNTS

An assessment has been carried out of the number of dwellings and the population within the noise contours produced for 2022. This has utilised a postcode database supplied by CACI Ltd, specifically the 2022 iteration of the database. Each postcode in the database is described by a single geographical point, and if this point is within a given contour then all of the dwellings and population in the postcode are counted as within the contour.

The dwelling and population counts are given for the 2021 and 2022 daytime and night-time contours in Table 4 and Table 5 respectively. The values in these tables have been rounded to the nearest 50, except where less than 50 when the actual value is given. The 2021 counts given here have been updated to utilise the latest postcode database, and so may differ from those previously reported.

6.0 SUMMARY

Noise contours have been produced for 2022 based on the actual movements during the summer period. The contours are larger than those for 2021. This is due to an increase in the number of daytime and night-time movements.

There has been some change in the shape of the 2022 noise contours compared to 2021, due to a lower proportion of movements conducting easterly operations (using Runway 07).

Dwelling and population counts for the daytime and night-time contours for both 2021 and 2022 have been determined based on a 2022 postcode database.

TABLE 21: DWELLING AND POPULATION COUNTS FOR DAYTIME SUMMER NOISE CONTOURS, 2021 AND 2022

Contour Value (dB LAeq,16h)	2021		2022	
	Dwellings	Population	Dwellings	Population
57	1,250	3,250	2,800	6,850
60	450	1,150	950	2,550
63	8	19	300	800
66	0	0	2	6
69	0	0	0	0
72	0	0	0	0

TABLE 22: DWELLING AND POPULATION COUNTS FOR NIGHT-TIME SUMMER NOISE CONTOURS, 2021 AND 2022

Contour Value (dB LAeq,16h)	2021		2022	
	Dwellings	Population	Dwellings	Population
48	4,500	10,550	7,100	16,900
51	2,000	5,250	4,050	9,500
54	750	2,100	1,600	4,250
57	150	400	650	1,750
60	3	5	100	300
63	0	0	0	0
66	0	0	0	0
69	0	0	0	0

FIGURE 3: 2022 SUMMER ACTUAL DAY
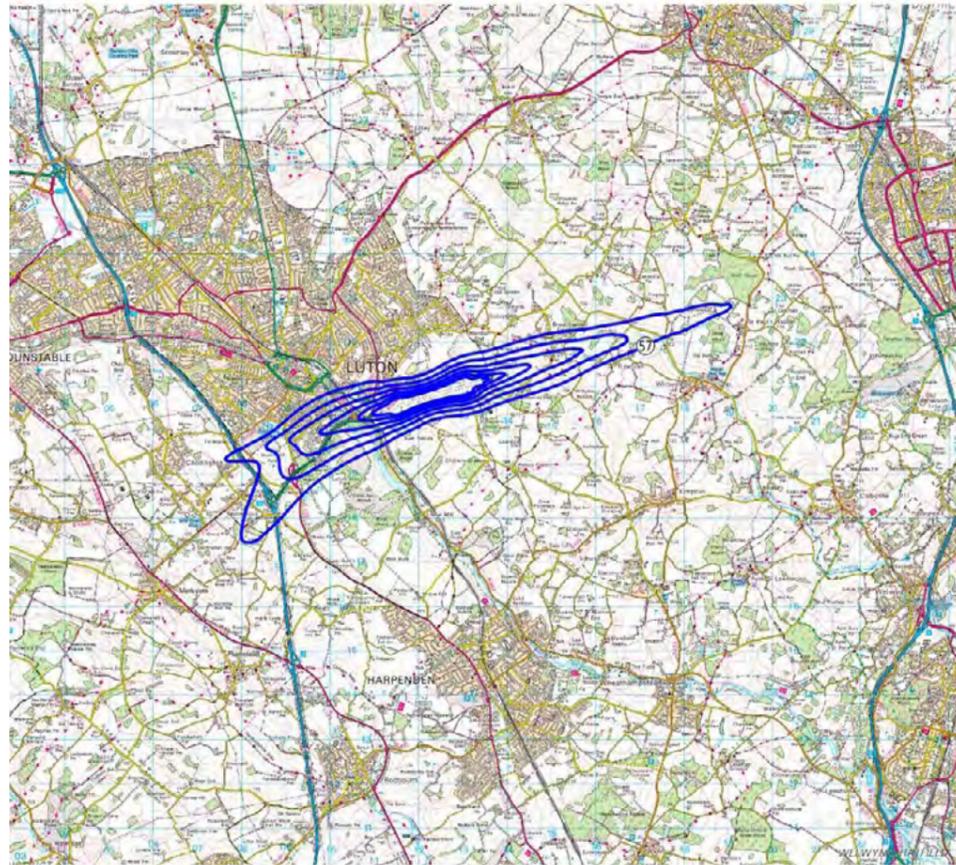
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LEGEND:

Noise Contours.
57 to 72 dB L$_{Aeq,16h}$ in 3 dB steps

REVISIONS

Bickerdike Allen Partners
Architecture
Acoustics
Technology

London Luton Airport
Regular Contouring

Airborne Aircraft Noise Contours
2022 Summer Actual Daytime

DRAWN: DR   CHECKED: DC

DATE: October 2022   SCALE: 1:100000@A4

FIGURE No:

A11060-N77-01_1.0

FIGURE 4: 2022 SUMMER ACTUAL NIGHT
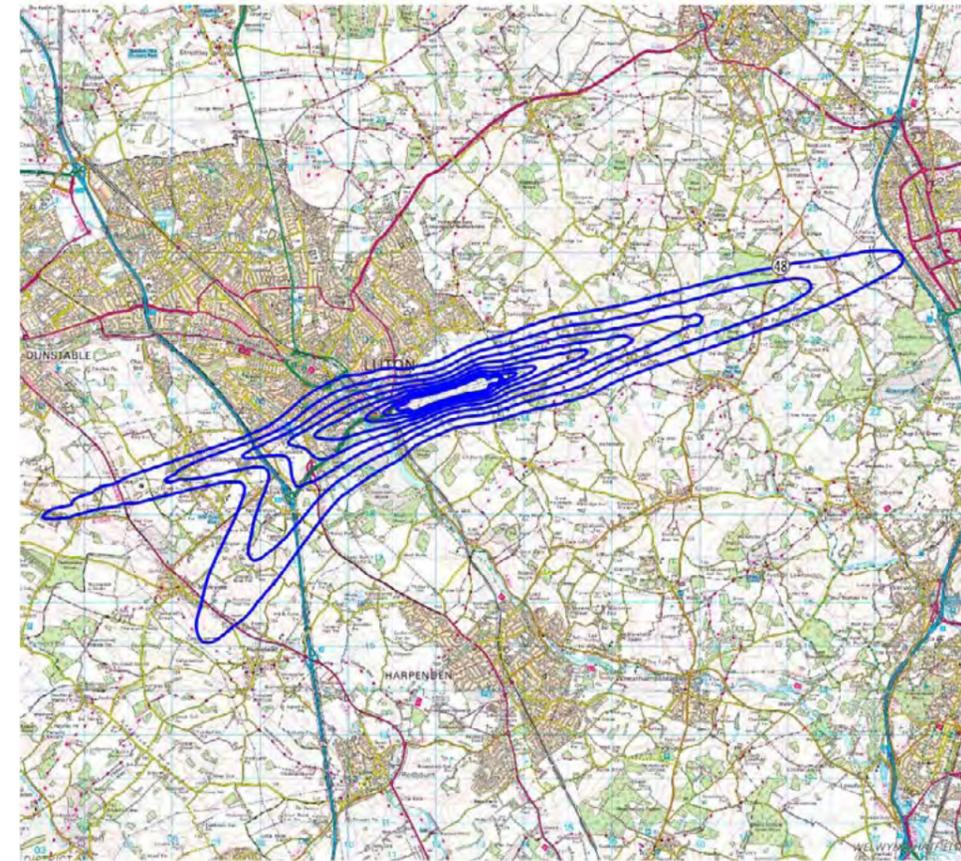
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LEGEND:

Noise Contours.
48 to 69 dB L$_{Aeq,8h}$ in 3 dB steps

REVISIONS

Bickerdike Allen Partners
Architecture
Acoustics
Technology

London Luton Airport
Regular Contouring

Airborne Aircraft Noise Contours
2022 Summer Actual Night-time

DRAWN: DR   CHECKED: DC

DATE: October 2022   SCALE: 1:100000@A4

FIGURE No:

A11060-N77-02_1.0

FIGURE 5: 2022 SUMMER DAY
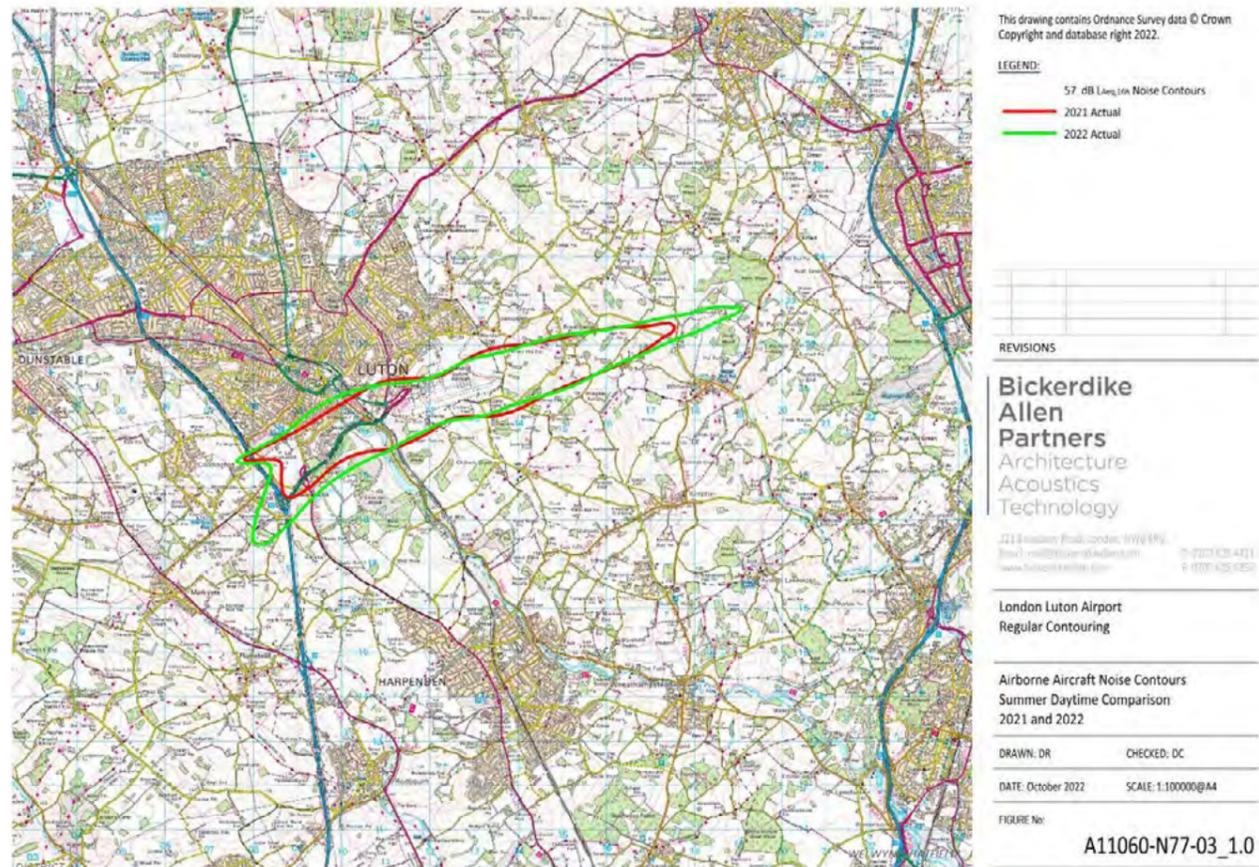
FIGURE 6: 2022 SUMMER NIGHT
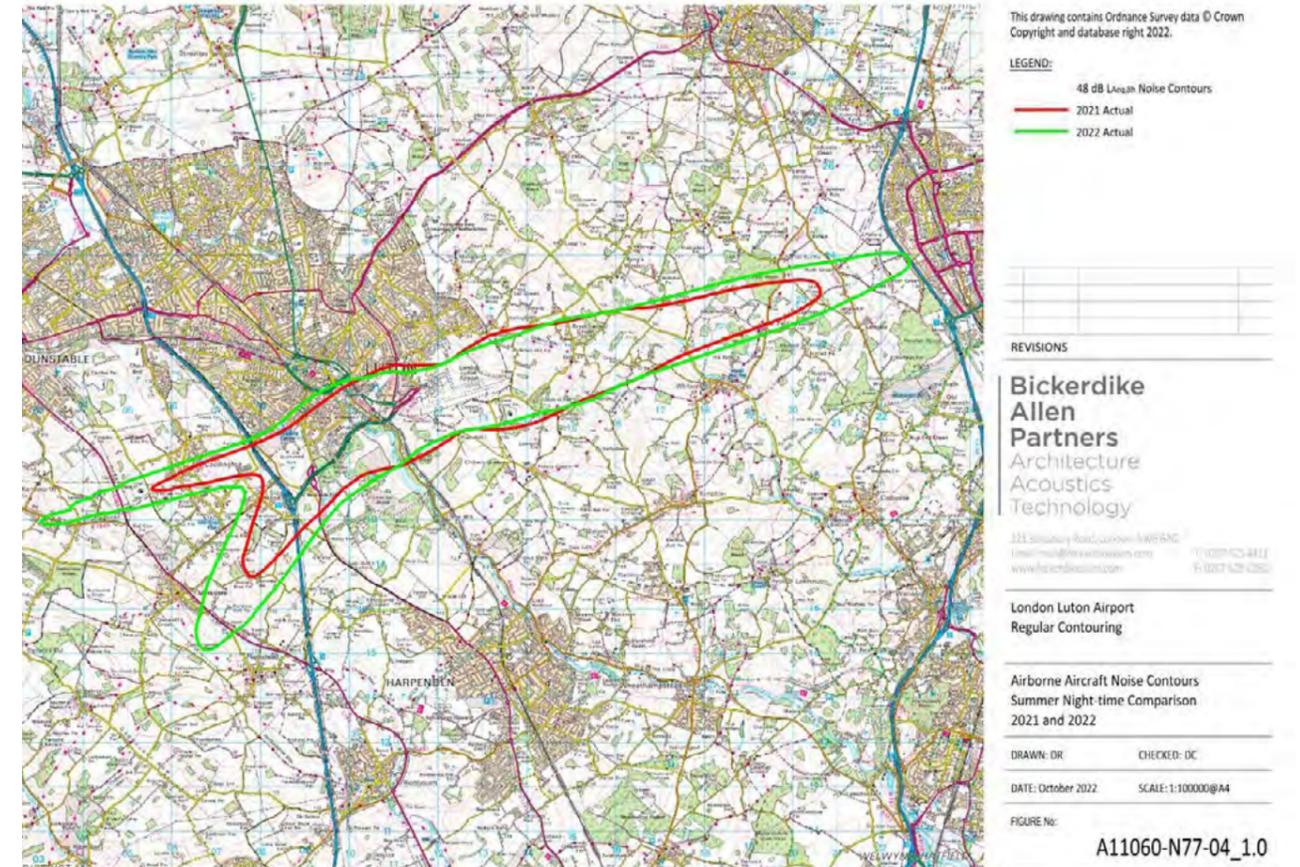
2022 ANNUAL CONTOURS

1.0 INTRODUCTION

London Luton Airport Operations Limited (LLAOL) have retained Bickerdike Allen Partners (BAP) to produce the annual Lden noise contours for 2022 in accordance with the airport's Noise Action Plan, which states that from 2013 the airport will "produce Lden noise contours annually, based on an annual average 24 hour period and present to LLACC (via NTSC)." The corresponding annual Lnight noise contours have also been produced.

2.0 CONTOUR PRODUCTION

Aircraft movement data for use in the contour production has been supplied by LLAOL. The contour production methodology is the same as that used for the 2022 quarterly night contours, with terrain data allowed for and the contours produced using the INM software (Version 7.0d) with user-defined profiles for the most common aircraft. The validation is based on measured results in 2021 at the fixed noise monitors with departure profiles for key aircraft types based on radar data.

3.0 AIRCRAFT MOVEMENTS

The 2022 aircraft movements used for the production of the noise contours as supplied by LLAOL are summarised and compared with those for 2021 in Table 1 below. Only aircraft types with at least 50 annual movements in either year have been presented. For aircraft types with fewer than 50 annual movements 'n/a' is shown and any movements are grouped together in the "Other" category.

The actual runway used by each movement during the individual day, evening and night periods of 2022 has been allowed for in the preparation of the contours. Table 2 summarises the overall percentage of modelled movements using each runway combining arrivals and departures over the full year and compares it with the runway usage in 2021.

TABLE 23: ANNUAL AIRCRAFT MOVEMENT NUMBERS BY INM AIRCRAFT TYPE

INM Aircraft Type	Day		Evening		Night	
	2021	2022	2021	2022	2021	2022
1900D	481	502	84	103	79	44
737400	4	n/a	55	n/a	181	n/a
737700	90	128	20	53	2	11
737800	4,528	9,337	1,084	2,491	737	2,381
737 MAX 8	21	730	51	182	n/a	30
757RR	44	11	41	73	743	938
A300-622R	440	635	83	95	367	352
A319-131	2,389	8,890	631	3,048	246	1,593
A320-211 (ceo)	9,396	16,239	3,818	6,649	1,204	3,351
A320-211 (neo)	3,729	6,317	1,160	1,690	865	1,969
A321-232 (ceo)	2,889	7,252	1,196	2,826	614	1,969
A321-232 (ceo)	3,582	5,637	1,343	1,935	853	1,453
A330-301	45	77	24	8	23	43
BEC58P	37	52	19	17	30	25
CIT3	42	51	9	10	5	9
CL600	794	1,180	134	207	42	57
CL601	1,736	2,659	247	435	65	144
CNA208	133	337	17	47	7	38
CNA500	93	175	16	29	8	6
CNA510	347	353	39	45	10	18
CNA525C	1,235	1,812	169	261	44	67
CNA55B	491	998	91	153	24	43
CNA560U	102	100	25	317	57	73
CNA560XL	1,718	2,187	250	317	57	73
CNA680	702	1,006	106	173	38	42
CNA750	628	742	98	133	13	32
EMB145	987	1,353	199	294	53	94
EMB190	82	99	11	29	5	10
F10062	701	1,338	161	276	81	158
GIV	399	589	61	112	34	54
GV	3,386	6,129	712	1,373	411	850
IA1125	70	77	17	20	1	5
LEAR35	638	803	88	140	27	47
MU3001	122	219	22	40	6	5
Other	252	322	67	99	28	32
Total	**42,333**	**78,336**	**12,148**	**23,426**	**6,908**	**15,951**

TABLE 24: ACTUAL ANNUAL RUNWAY USAGE (PERCENTAGE OF TOTAL MOVEMENTS)

Runway End	2021	2022
07	32%	30%
25	68%	70%

4.0 NOISE CONTOUR RESULTS

The resulting noise contours are shown in the attached Figures A11060-N78-01 and A11060-N78-02. They are presented at values from 55 to 75 dB(A) Lden and 48 to 66 dB(A) Lnight. Comparisons between the 2022 and the 2021 noise contours are shown in the attached Figures A11060-N78-03 and A11060-N78-04 at 55 dB(A) Lden and 48 dB(A) Lnight respectively. The areas, population and dwelling counts relating to each noise contour are given in Table 3 for Lden and Table 4 for Lnight values and compared with the values for 2021.

4.1 NOISE CONTOUR COMPARISON

The total number of annual movements increased in 2022 compared to 2021, due to the ongoing recovery from the COVID-19 pandemic. The annual number of movements remains around 20% lower than occurred pre-pandemic in 2019.

The annual fleet mix in 2022 is broadly similar to that in 2021, with Airbus and Boeing passenger jets making up the majority of the movements in both years. The number of movements performed by quieter modernised aircraft has increased. However, due to the large increase in total movements compared to 2021, the proportion of movements by these aircraft has reduced from 27% in 2021 to 23% in 2022.

As can be seen from Table 3 and Table 4, the areas of the Lden and Lnight contours have increased, due to the increase in the number of movements. The increase in the area of the 2022 contours compared to 2021 can be seen in figures A11060-N78-03 & 04, which compare the 55 dB Lden and 48 dB Lnight contours respectively. The population and number of dwellings within the contours have also increased, primarily due to the larger contour areas.

TABLE 25: CONTOUR AREAS AND POPULATION & DWELLINGS WITHIN CONTOURS - L$_{DEN}$

Contour Value (dB LAeq,16h)	Contour Area (km²)		Population [1]		Dwellings [2]	
	2021	2022	2021	2022	2021	2022
55	22.3	32.1	10,800	16,400	4,650	6,650
60	8.9	12.1	2,800	6,100	1,100	2,450
65	3.2	4.6	<100	1,200	<50	450
70	1.2	1.5	0	0	0	0
75	0.6	0.6	0	0	0	0

[1] Population counts rounded to nearest 100, where less than 100 "<100" is shown.

[2] Dwelling counts rounded to nearest 50, where less than 50 "<50" is shown.

TABLE 26: CONTOUR AREAS AND POPULATION & DWELLINGS WITHIN CONTOURS - L$_{NIGHT}$

Contour Value (dB(A) Lnight)	Contour Area (km²)		Population [1]		Dwellings [2]	
	2021	2022	2021	2022	2021	2022
48	18.6	27.0	8,900	13,900	3,850	5,850
51	10.7	15.1	4,400	7,800	1,750	3,300
54	6.3	7.9	1,200	3,300	450	1,200
57	3.2	4.6	<100	1,200	<50	450
60	1.7	2.4	0	<100	0	<50
63	1.0	1.3	0	0	0	0
66	0.7	0.8	0	0	0	0

[1] Population counts rounded to nearest 100, where less than 100 "<100" is shown.

[2] Dwelling counts rounded to nearest 50, where less than 50 "<50" is shown.

FIGURE 7: 2022 ANNUAL LDEN-LTN REPORT

LEGEND:

Noise Contours,
55 to 75 dB Lden in 5 dB steps
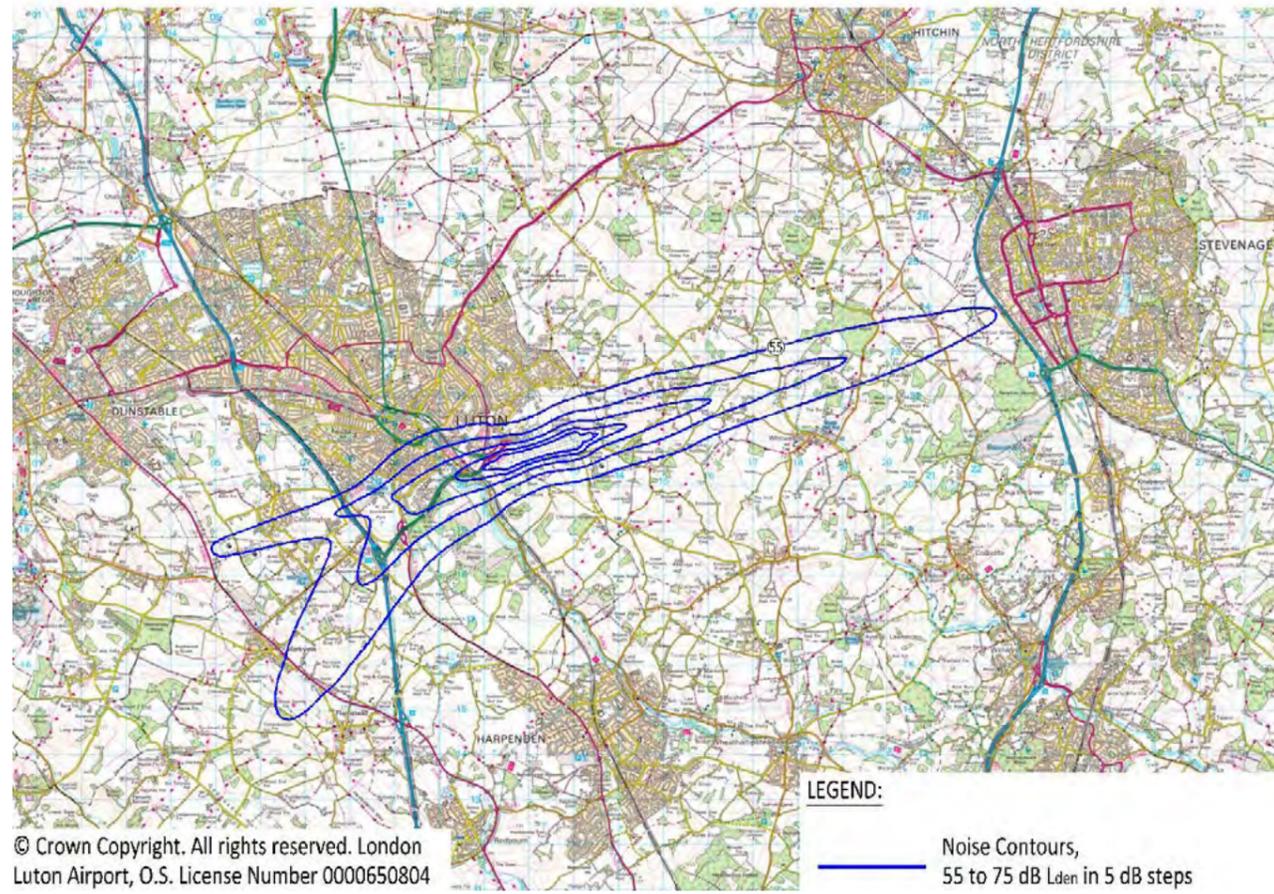
FIGURE 8: ANNUAL LNIGHT-LTN REPORT

LEGEND:

Noise Contours,
48 to 66 dB L$_{Aeq,8h}$ in 3 dB steps
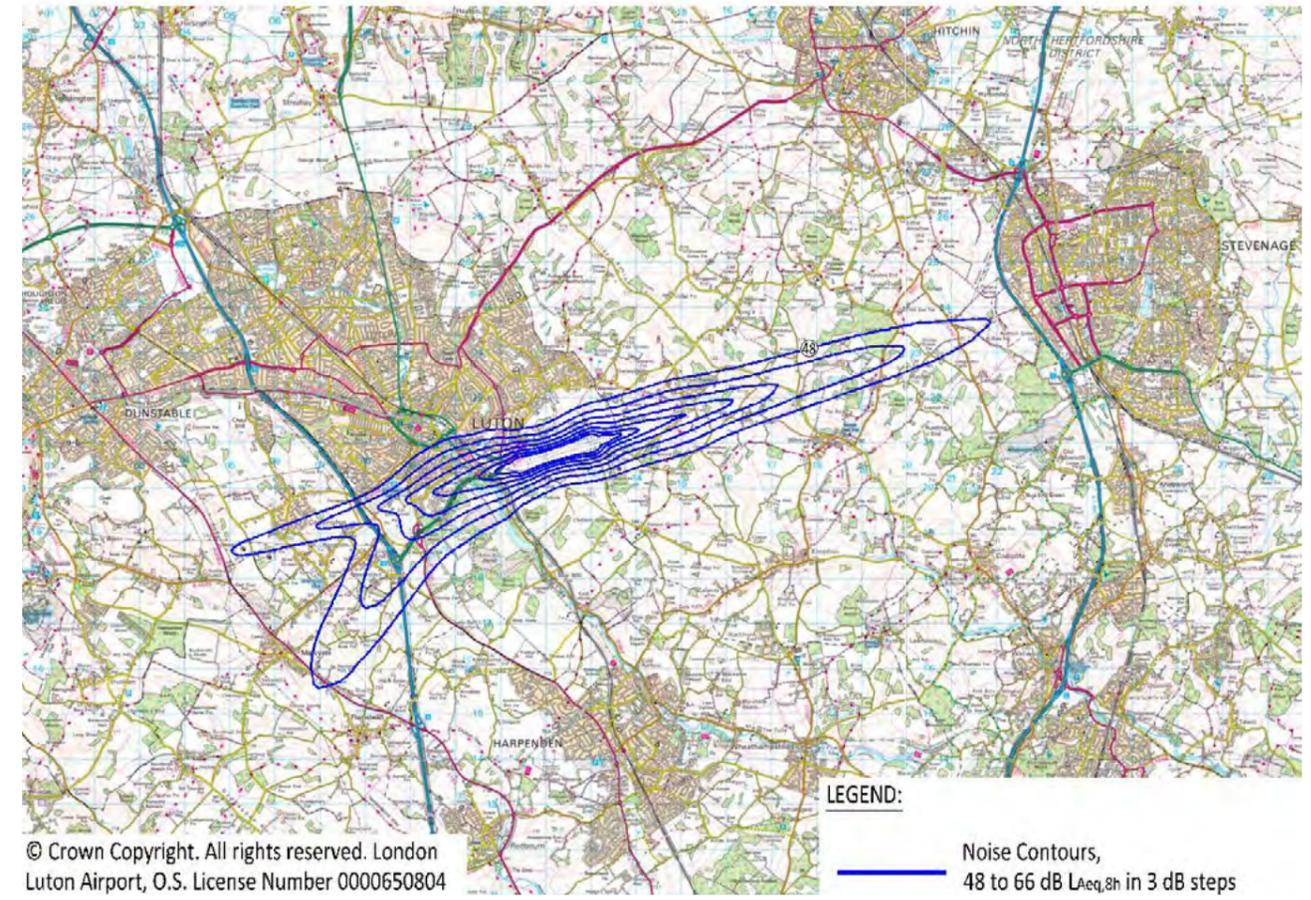
MARGINAL COMPLIANCE ASSESSMENT

1.0 INTRODUCTION

Planning consent was granted in 2014 by Luton Council (LC) to application 12/01400/FUL submitted by London Luton Airport Operations Ltd (LLAOL). The consent was subject to the imposition of certain planning conditions with respect to several matters including noise.

In response to the development it was agreed between the airport and the airport's consultative committee, LLACC, that the following would be reported in the airport's Annual Monitoring Reports (AMRs) beginning twelve months after commencement of the development:

• Actual annual movements by marginally compliant Chapter 3 aircraft (00:00-24:00)

• Actual annual QC 2 aircraft movements (23:00-07:00)

This note reports these movement totals for 2022.

2.0 MARGINAL COMPLIANCE CALCULATION

Aircraft movement data for use in the marginal compliance calculation has been supplied by LLAOL. For the aircraft that operated, noise certification data has been obtained either from the Noise Certificate of the specific aircraft, or for those registered in the UK from the CAA G-INFO database[1] and those registered in Switzerland from the FOCA Swiss Aircraft Register[2]. Where certification data was not available, certification values have been taken from the latest EASA Approved Noise Levels[3]. In some cases the EASA database offers more than one possible classification for an aircraft type, in these cases where one of the possible classifications is for marginal Chapter 3 compliance, then the movements by this aircraft have been counted as "Unknown Classification".

For the purposes of this assessment "marginally compliant aircraft" means civil subsonic jet aeroplanes, that meet the certification limits as laid down in Chapter 3 of Annex 16 by a cumulative margin of not more than 5 EPNdB, whereby the cumulative margin is a figure expressed in EPNdB obtained by adding the individual margins at each of the three reference noise management points as defined in Chapter 3 of Annex 16.

The number of movements by marginally compliant Chapter 3 aircraft by month are listed in Table 1. The table also includes the number of movements that comply with Chapter 3, but not marginally, or comply with Chapter 4 or Chapter 14, and the number where the classification is unknown.

The certification of helicopter and propeller aircraft is to different standards and so these aircraft have been separately recorded. Military aircraft are not subject to noise certification and therefore would be included in this category. There were no movements by military aircraft in 2022.

Taking the year as a whole, there were 116,453 movements where Chapter 3 categorisation is applicable, none are known to be marginally compliant. There were no movements by an aircraft with unknown classification.

TABLE 27: 2022 MONTHLY AIRCRAFT NOISE CLASSIFICATION

Month	Aircraft Noise Classification			
	Chapter 3 Marginally Compliant	Chapter 3 Fully Compliant / Chapter 4 / Chapter 14	Unknown Classification	Helicopters and Propeller Aircraft (n/a)
January 2022	0	5,781	0	99
February 2022	0	6,534	0	110
March 2022	0	8,395	0	135
April 2022	0	10,039	0	124
May 2022	0	11,393	0	169
June 2022	0	11,517	0	156
July 2022	0	11,872	0	167
August 2022	0	11,412	0	132
September 2022	0	11,262	0	145
October 2022	0	11,237	0	167
November 2022	0	7,869	0	105
December 2022	0	9,142	0	100
2022 Total	0	116,453	0	1,609

[1] http://publicapps.caa.co.uk/modalapplication.aspx?appid=1

[2] https://www.bazl.admin.ch/bazl/en/home/specialists/aircraft/aircraft-noise-certification.html

[3] https://easa.europa.eu/document-library/noise-type-certificates-approved-noise-levels

3.0 QUOTA COUNT PRODUCTION

Aircraft movement data for use in the quota count production has been supplied by LLAOL. The standard quota count production methodology is described in the latest UK AIP Supplement S058/2022[4]. In summary, the method requires the certification data for the aircraft type, which is then processed and compared to a scale to determine the quota count for the aircraft type when arriving, and separately when departing.

For the aircraft that operated, the noise certification data has been obtained either from the Noise Certificate of the specific aircraft, or for those registered in the UK from the CAA G-INFO database[1] and those registered in Switzerland from the FOCA Swiss Aircraft Register[2]. Where certification data was not available, quota count values have been taken from the tables in the latest UK AIP Supplement. In some cases these tables offer more than one value for an aircraft type, in these cases the expected QC value based on available information has been used, and where only limited information is available the higher QC value has been taken.

Some Airbus A300-600 and Airbus A330-200 aircraft would normally be classified as QC 2 on departure if operated at their certificated maximum take-off weight. LLAOL have advised that due to the length of the runway at Luton Airport, these aircraft cannot depart at their certificated maximum weight (although the aircraft may do this at other airports). Based on an analysis of their maximum operating weight at Luton Airport and certificated noise levels for other aircraft of the same type at a range of departure weights, LLAOL have calculated that these aircraft should be classified as QC 1 when operating at Luton Airport.

The only aircraft movement classified as QC 2 in 2022 was a departure by an Airbus A321 aircraft. Certification data for this specific aircraft was not available and therefore a worst case assumption was made. There were no night-time aircraft movements with a QC value of greater than 2 in 2022.

TABLE 28: 2022 MONTHLY QC 2 AIRCRAFT MOVEMENTS

Month	Number of QC2 Aircraft Movements (23:00-07:00)
January 2022	0
February 2022	0
March 2022	0
April 2022	1
May 2022	0
June 2022	0
July 2022	0
August 2022	0
September 2022	0
October 2022	0
November 2022	0
December 2022	0
2022 Total	1

[4] https://nats-uk.ead-it.com/cms-nats/opencms/en/Publications/AIP/

Appendix 11: Planning & Development

Through its Local Plan, Luton Council sets out local planning policies and identifies how land is used, determining what will be built where. The Council also is responsible for the Local Transport Plan (LTP) providing policies, strategies and schemes primarily for Luton. The LTP also refers to strategic transport, infrastructure and other cross boundary matters for Luton's neighbouring towns of Dunstable and Houghton Regis, which form the wider urban conurbation.

11. 1 LOCAL PLAN

The Luton Local Plan (2011-2031) adopted in November 2017, is a strategic document setting out the vision, objectives and spatial planning strategy for Luton up to 2031.

It comprises the following document and accompanying maps:

- Luton Local Plan (2011-31), November 2017

- policies map

- town centre inset map.

These are available on the Council's website at:

https://www.luton.gov.uk/Environment/Planning/Regional%20and%20local%20planning/Pages/Local%20Plan%202011%20-%202031.aspx

Policy LLP6 of the Local Plan covers the London Luton Airport strategic allocation, an area of 325 hectares, identified on the policies map, including land within the airport boundary, Century Park and Wigmore Valley Park.

11. 2 PLANNING APPLICATIONS

The following planning applications and consultations under Part 8 of the Town and Country Planning (General Permitted Development) Order (which confers permitted development rights upon the airport operator as statutory undertaker) were either submitted in 2022, determined that year, or else have been undertaken pursuant to an earlier planning permission:

- In February 2022, following a consultation from the airport operator, the Council confirmed that the provision of a covered walkway between the terminal and the entrance to the new Direct Air-Rail Transit (DART) station was permitted development (ref: 22/00095/GPDOPD)

- In September 2022, the Council confirmed that the reconfiguration of the commercial and general aviation stands at the airport to provide a total of 46 commercial stands at the airport was permitted development (ref: 22/01104/GPDOPD)

- The airport operator's planning application, which had been submitted in January 2021, to vary conditions relating to passenger throughput, noise contours, car park management for the airport, the airport travel plan and the approved plans and documents, to accommodate an increase from 18 to 19 million passengers per annum and to amend the daytime and night-time noise contours (ref: 21/00031/VARCON) was called in by the Secretary of State in April 2022. The application was the subject of a public inquiry held between September and November 2022, and the decision of the Secretary of State is expected in 2023.

Separately, in February 2022 the airport owner, Luton Rising, undertook a second proposed statutory consultation on their proposed expansion of the airport to increase the passenger numbers to 32 million passengers per year, involving the provision of a new terminal and associated infrastructure. The proposal would be a Nationally Significant Infrastructure Project (NSIP) and would require an application for a Development Consent Order (DCO) to be determined by the Secretary of State. It is anticipated that the DCO application will be submitted in 2023.

11.3 HOTEL DEVELOPMENTS

The Luton hotel market is very much dominated by airport related demand, from passengers and crew, with the Luton Hotel Study (July 2015) indicating that demand was likely to continue to grow.

The following hotel developments have been granted planning permission, are being implemented (or still to be implemented), or are still under consideration, since the table in the 2021 AMR was produced –

TABLE 29

Site address	Current status of application	Number of bedrooms
Bartlett Square	Planning permission was granted for 172-bedroom hotel in January 2020 (the permission has been implemented, the hotel is yet to be built).	172
Napier Gateway (part of the Napier Park site)	Mixed development including 209-bedroom hotel (the permission has been implemented, the hotel is yet to be built).	209
Power Court (Town Centre)	Outline permission for football stadium and associated infrastructure granted planning permission in September 2019 (the permission has been implemented, the hotel is yet to be built).	150
Land adjoining junction 10 to junction 10A of M1	Outline application for mixed-use development including a hotel granted planning permission in September 2019 (Note: in 2022 a new application was submitted, which was recommended for approval subject to a legal agreement, but the application did not include a hotel).	350
New Century Park	Hybrid planning application, including a new business park, access road, new public open space and a 145-bedroom hotel granted planning permission in June 2021 (yet to be implemented).	145
Manor Court, Manor Road (Town Centre)	Planning permission granted September 2022, for change of use from student accommodation to flexible hotel/student accommodation.	97
Courtyard by Marriott Airport Way	Application for eight storey hotel comprising 171 bedrooms recommended for approval subject to the signing of a legal agreement in September 2020 (still awaiting the signing of legal agreement in 2022)	171
135 New Bedford Road	Application for the reuse and extension of existing hotel to provide 10 rooms approved in July 2021 (yet to be implemented).	10
Linton Hotel, 107 London Road	Application for the demolition of existing hotel and development of a four storey building to comprise 62 apartments recommended for approval in March 2022 subject to the signing of a legal agreement (yet to be signed).	43
135 New Bedford Road	Planning permission for 20 additional hotel rooms granted April 2022 (yet to be implemented).	20
Icon Hotel, Stuart Street	Planning application for the demolition of the existing hotel and the erection of an 18 storey building comprising 102 flats and six commercial units recommended for approval in July 2022 subject to the signing of a legal agreement (yet to be signed).	60

11.4 NATIONAL AVIATION POLICY

The Aviation Policy Framework (APF) published in March 2013 set out the UK Government's policy on aviation. The APF focuses on the benefits of aviation to the UK economy as well as its environmental impacts.

The 'Airports National Policy Statement: new runway capacity and infrastructure at airports in the south-east of England' (ANPS) was designated in June 2018. The ANPS provides the primary basis for decision making in relation to the Development Consent Order (DCO) for a new runway at Heathrow, whilst also being an important and relevant consideration in respect to applications for new runway capacity in London and the south-east of England.

The ANPS sets out:

▪ The Government's policy on the need for new airport capacity in the South East of England

▪ The Government's preferred location and scheme to deliver new capacity (the Heathrow Northwest Runway)

▪ Particular considerations relevant to a development consent application to which the ANPS relates.

The ANPS includes policies that will be important and relevant for any nationally significant infrastructure project (NSIP) related to airports in the south east of England, including Luton Rising's proposal to increase the capacity at the airport to 32 million passengers per annum (mppa).

The 'Future of UK Aviation: Making Best Use of Existing Runways' (MBU) was published in June 2018 and is the most up-to-date Government policy concerning the expansion of airports, restating the Government's support for airports making best use of their runways. The document recognises that airport development can have positive and negative local impacts, and reiterates the importance of ensuring that benefits are shared with communities and detriment is appropriately mitigated.

In May 2022, the Government published its strategic framework for the aviation sector, Flightpath to the Future, which recognises the important role that airports have to play in local economies through boosting economic success, supporting local jobs and supply chains, and benefitting local communities.

The Government's Jet Zero Strategy was published in July 2022 and commits the sector to Net Zero UK aviation emissions by 2050 and airport operations to zero emissions by 2040. The Jet Zero Strategy makes clear that Net Zero UK aviation emissions can be achieved without the Government intervening to limit airport growth. The Government forecasts that Net Zero UK aviation emissions can be achieved by 2050 through six policy measures, namely: system efficiencies; use of sustainable aviation fuels; uptake of zero emission flights; investing in carbon markets and greenhouse gas removals; influencing consumers; and addressing non-CO2 impacts.

11.5 LOCAL TRANSPORT PLAN

The current local transport plan (LTP4) produced by the Council in April 2021, sets out how the Council will deal with transport matters in and around Luton. It comprises two parts:

▪ A long term Transport Strategy up to 2040. With regard to the transport affecting the airport, this sets out enhancements to access for the airport and an increased reliance upon sustainable modes of transport, including the DART

▪ A series of transport policies, setting out how the strategy will be implemented.

LTP4 captures Strategic Objective 1 from the Luton Local Plan 2011-2031, which establishes that the Council will safeguard the existing operations of the airport and support its sustainable growth.

The LTP does not make direct reference to the Airport Surface Access Strategy 2018-2022 (ASAS), however, this document remains relevant in promoting sustainable travel to the airport for both passengers and employees, and the Council will work with the airport operator to achieve this.

12.1 INTRODUCTION

Employment at and surrounding London Luton Airport (LLA) contributes significant economic benefits to Luton as a whole and to the region. A large number of businesses are based in Luton due to the presence of the airport. An analysis of employers within and around the airport boundary has been conducted. These figures were calculated from 2022 data from the Office for National Statistics' Inter Departmental Business Register (IDBR) which records the number of employees.

12.2 METHODOLOGY

A list of businesses at London Luton Airport was matched with the Inter Departmental Business Register1 (IDBR). The IDBR dataset produced by the Office for National Statistics (ONS) is a comprehensive list of UK businesses that is used by the government for statistical purposes. It provides a sampling frame for surveys of businesses carried out by the ONS and by other government departments. It is also a key data source for analysis of business activity.

A list of businesses was received from London Luton Airport of companies within their boundary. The listing was matched against the IDBR. Companies outside the airport boundary were identified by the street names/areas as follows:

▪ Spittlesea Road

▪ Part of Frank Lester Way

▪ President Way

▪ Wigmore House

▪ Part of Airport Way

▪ Barratt Industrial Park

▪ Airport Executive Park

A handful of companies which appeared on the list, but not the IDBR, had imputed estimates from analysis of the size of the enterprise and information from the airport.

12.3 TOTAL EMPLOYMENT IN AND AROUND THE AIRPORT

Employment was measured using main section headings from the Standard Industrial Classification 2007 (SIC 2007). Data has been rounded to the nearest hundred, as per ONS guidelines.

TABLE 30

Industrial sector	Total Employees
Accommodation and Food Service Activities	400
Administrative and Support Service Activities	3,200
Financial and Insurance Activities	#
Manufacturing	600
Professional, Scientific and Technical Activities	#
Public Administration & Defence; Compulsory Social Security	300
Real Estate Activities	#
Transportation and Storage	6,300
Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	200
Grand Total	**11,100**

Figures have been suppressed where there are less than three companies in a given sector and/or employment in that sector is less than 100 in accordance with the regulations covering the use of IBDR data. Standard Industrial Classification 2007 industrial sector codes have been used. Components may not sum to total due to rounding and supressed data.

There are an estimated 11,100 employees in and around the airport. This employment figure increased by 5 per cent between 2021 and 2022. There are 9,200 full time and 1,900 part time employees. The largest industrial sector represented is transportation and storage with 6,300 employees and there are 3,200 employees in the administration and support services sector.

12.4 EMPLOYMENT BY WORKING PATTERN

The total number of full time employees was 9,200 which increased by 400 between 2021 and 2022, an increase of 5 per cent. The figure for part time employees was 1,900 which was unchanged from the previous year.

TABLE 31

	Full Time Employees	Part Time Employees
Vicinity of Luton Airport	83%	17%
Luton UA	69%	31%

The percentage split of full/part time employees found at the airport compared to that found in Luton as a whole is as follows:

Source for Luton UA Figures: ONS Business Register & Employment Survey 2021, latest data. Figures are percentages of those in employment.

Full and part-time working patterns in the vicinity of the airport differs from that found within Luton as a whole, with the airport having a higher proportion of full-time workers.

12. 5 LONG TERM TRENDS

The following figures from 2014 to 2022 show the estimated employment levels in the vicinity of the airport.

The numbers recorded as in employment around Luton Airport increased from 10,600 to 11,100 between 2021 and 2022, an increase of 5 per cent. The estimates for 2020 and 2021 include employees who had been furloughed and 2022 is the first year of post pandemic employment figures. The data shows that the furlough scheme was successful in maintaining employment levels during the pandemic and that in 2022 employment at the airport returned to similar numbers recorded prior to COVID-19. The 2022 employment figure is encouraging as it indicates recovery from the pandemic and that there has not been any long term impact on employment at the airport.

FIGURE 9: ESTIMATE OF EMPLOYMENT IN AND AROUND THE LUTON AIRPORT VICINITY BY YEAR

Year	2014	2015	2016	2017	2018	2019	2020	2021	2022
Airport Employment	8,500	9,500	9,300	10,200	10,400	11,200	11,200	10,600	11,100

Source: Business Intelligence, Luton Council

Appendix 13: Noise Action Plan
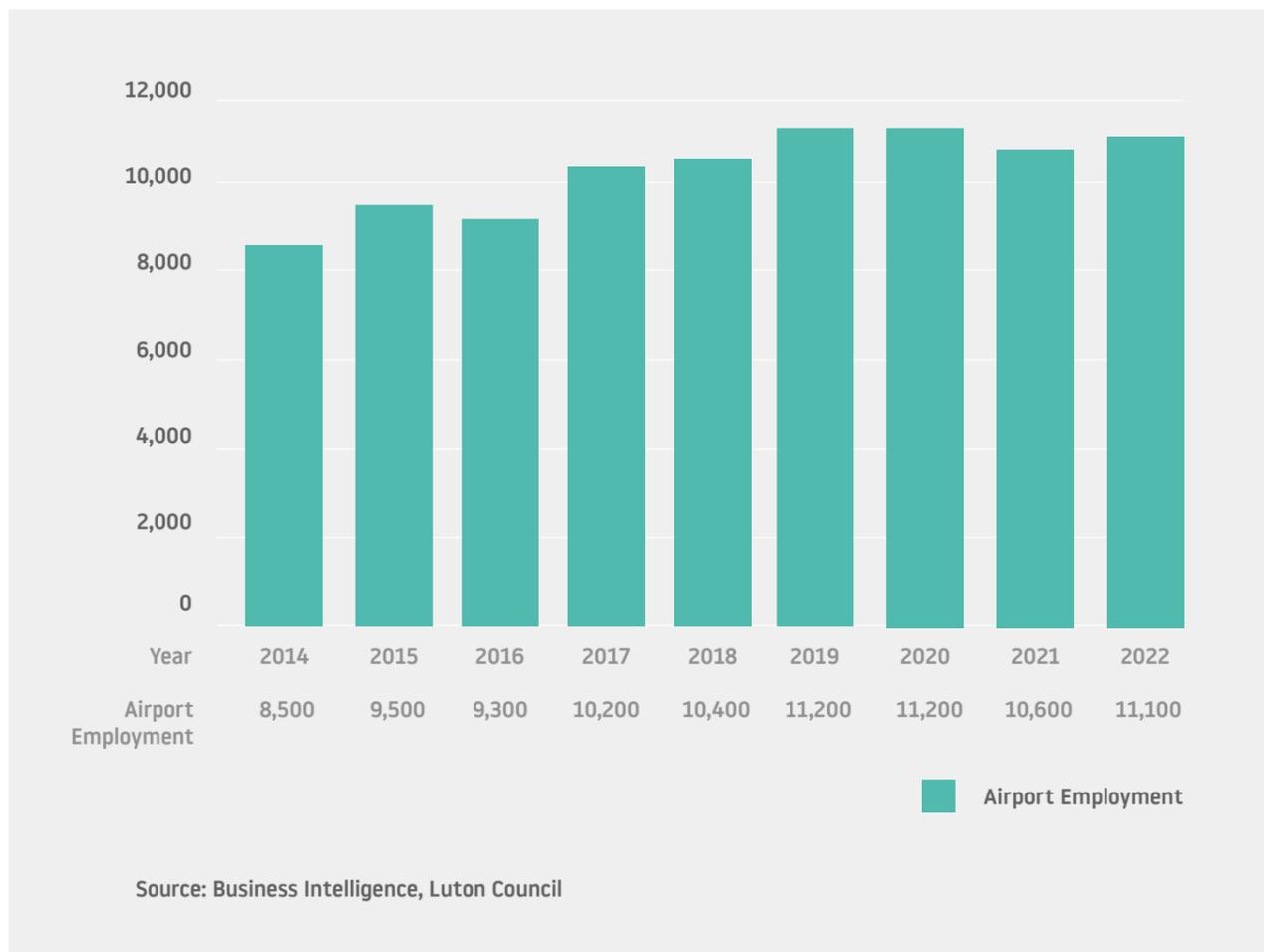
TABLE 32: OPERATIONAL PROCEDURES

Ref:	Action	Impact	Timescale	Performance Indicator	Numbers Affected	Target	Progress to date
1.1	Reduce the Maximum Noise Violation Limits (NVL) for departing aircraft and bi-annually review the penalties to ensure it remains effective in seeking to reduce departure noise.	Departure Noise	2020	Reduction of NVL's.	Residents within and beyond 55dB L$_{den}$	Reduce NVL's to 80dB during the day time and 79dB during the night-time by 2020.	Complete - reduction implemented from 1st Jan 2020
1.2	We will work with our airline partners to improve performance relating to Continuous Descent Approach (CDA) with the aim of reducing the noise impact to the communities below.	Arrival Noise	Ongoing	CDA Compliance.	Residents within and beyond 55dB L$_{den}$	92% compliance by 2020. 95% compliance by 2022.	Ongoing - implemented new target from 1st Jan 2020
1.3	We will identify and act on opportunities to minimise noise through modernisation of the airspace structure working with both community and industry partners.	Departure/ Arrival Noise	Ongoing	Progress through CAP 1616 process.	Residents within and beyond 55dB L$_{den}$	Submit Airspace Change Proposal to the CAA by 2022.	Ongoing - Stage 2 FASI-S passed in March 2022.
1.4	Work with Air Traffic Control, airlines and local communities stakeholders to explore opportunities to facilitate more continuous climb operations (CCO).	Departure Noise	2019-2023	Evidence of work.	Residents within and beyond 55dB L$_{den}$	Explore opportunities and make appropriate changes to facilitate more CCO's.	Ongoing - linked to FASI-S programme (target 1.3).
1.5	Undertake a review of Noise Abatement Departure Procedures used at London Luton Airport to evaluate their effectiveness and work with our airline partners to identify and implement improvements.	Departure Noise	2019	Evidence of the review.	Residents within 55dB L$_{den}$	To assess the effectiveness and establish targets for noise reduction.	Ongoing - trial completed in 2022, work with partners ongoing.
1.6	Review and promote the Arrivals Code of Practice and Departures code of Practice and work with our airline partners to set minimum performance criteria and a method for measuring performance.	Arrivals/ Departure/ Ground Noise	2019-2023	Evidence of review and new performance criteria.	Residents within and beyond 55dB L$_{den}$	Set minimum performance criteria by Q2 2019.	Incomplete - new target to be complete by end of 2023.
1.7	Continue to promote and encourage the use of single engine taxi procedures at London Luton Airport.	Ground Noise	Ongoing	Minutes of FLOPC meetings.	Residents within 65dB L$_{den}$	Increase the number of aircraft using single engine taxi procedures.	Ongoing
1.8	Work with our airline partners to promote and encourage the adoption of low power, low drag procedures such as delayed landing gear deployment in order reduce noise from arriving aircraft.	Arrival Noise	Ongoing	% of aircraft using low power, low drag procedures.	Residents within and beyond 55dB L$_{den}$	Increase the number of operators using low power, low drag procedures.	Ongoing - through FLOPC meetings in 2022.
1.9	Working with our partners at Sustainable Aviation we will challenge current operational procedures to ensure continuous improvement to best practice.	Departure/ Arrival Noise	Ongoing	Minutes of Sustainable Aviation meetings.	Residents within and beyond 55dB L$_{den}$	Annually review and improve the departures and arrivals code of practice.	Ongoing - Meetings attended in 2022.

TABLE 33: QUIETER AIRCRAFT

Ref:	Action	Impact	Timescale	Performance Indicator	Numbers Affected	Target	Progress to date
2.1	We will work with our Airline Partners to achieve the voluntary phase out of aircraft that are Chapter 3 or below, to encourage the introduction of quieter aircraft.	Departure/ Arrival/ Ground Noise	2019-2023	% of Chapter 4 aircraft.	Residents within and beyond 55dB L_{den}	100% Chapter 3 aircraft by 2020 and 100% Chapter 4 aircraft by 2022.	Ongoing - 100% Chapter 3 aircraft or above achieved in 2020 and 2021.
2.2	We will review our landing charges annually to encourage the use of quieter aircraft at London Luton Airport.	Departure/ Arrival/ Ground Noise	Annually	Publication of Charge's and Conditions of use.	Residents within and beyond 55dB L_{den}	Reduce the size of the noise contours.	Ongoing - landing charges are reviewed annually.
2.3	Introduce incentives for airlines to adopt the quietest aircraft e.g. Airbus NEO and Boeing Max.	Departure/ Arrival/ Ground Noise	2019	Publication of Charge's and Conditions of use.	Residents within and beyond 65dB L_{den}	Introduce new charges in 2019.	Complete - new charges implemented for 2020-2021.

TABLE 34: OPERATIONAL RESTRICTIONS

Ref:	Action	Impact	Timescale	Performance Indicator	Numbers Affected	Target	Progress to date
3.1	We will operate within our agreed Total Annual Movement caps.	Night Noise	Ongoing	Movement reports in AMR and QMR.	Residents within and beyond 48dB L_{night}	A maximum of 9,650 movements between 23:00hrs-06:00hrs and a maximum of 7000 movements between 06:00hrs-07:00hrs for a rolling 12-month period.	Ongoing
3.2	We will continue to operate within our agreed Total Annual Quota Count (QC) caps.	Night Noise	Ongoing	QC reports in AMR and QMR.	Residents within and beyond 48dB L_{night}	3,500 QC points for a rolling 12-month period between (23:30hrs-06:00hrs).	Ongoing
3.3	To review and reduce the Total Annual Quota Count (QC) cap.	Night Noise	2020	Reduction of annual QC cap.	Residents within and beyond 48dB L_{night}	To review the Quota Count (QC) cap in 2020 to minimise night time noise disturbance.	Ongoing
3.4	We will operate within our agreed contour area limits.	Arrivals/ Departure/ Ground Noise	Ongoing	Area of noise contours	Residents within 57dB $L_{aeq\ 16\ h}$ and within 48dB L_{night}	57dB(A) Leq16hr (0700-2300) - 19.4 sq km. 48dB(A) Leq8hr (2300- 0700) - 37.2 sq km.	Ongoing - planning application to change limits.
3.5	Develop a noise contour reduction strategy to define methods to reduce the area of the noise contours.	Arrivals/ Departure/ Ground Noise	2021	Evidence of work.	Residents within 57dB $L_{aeq\ 16\ hr}$ and within 48dB L_{night}	Submit strategy to Local Planning Authority in 2021.	Complete - submitted to local planning authority.
3.5	In order to minimise ground noise we will monitor and enforce restrictions around the use of Aircraft Auxiliary Power Unit's (APU).	Ground Noise	Ongoing	Minutes of FLOPC meetings.	Residents within 65dB L_{den}	Ensure operators are aware of the APU procedures at Flight Operations Committee meetings.	Ongoing
3.6	In order to minimise ground noise, particularly at night, we will restrict the permitted hours for engine testing to daytime periods only.	Ground Noise	Ongoing	Log of engine testing.	Residents within 48dB L_{night}	Restrict engine testing for aircraft in the daytime period only.	Ongoing - In 2022 one aircraft started engine testing at 06:50hrs.

TABLE 35: LAND-USE PLANNING AND MITIGATION

Ref:	Action	Impact	Timescale	Performance Indicator	Numbers Affected	Target	Progress to date
4.1	We will install acoustic insulation in eligible properties as part of our residential and non-residential Noise Insulation schemes.	Ground/ Departure/ Arrival Noise	Ongoing	Noise Insulation Scheme update in QMR and AMR.	Residents within 63dB L_{day} or 55dB L_{night} or any property in which airborne noise level in excess of 90dB SEL occurs.	Continue to spend the full NIS budget annually.	Ongoing - 114 properties insulated in 2022.
4.2	We will conduct an annual survey of those properties who have received noise insulation to measure the levels of satisfaction with the current Noise Insulation Scheme.	Ground/ Departure/ Arrival Noise	2019-2023	Annual Survey Results.	N/A	Conduct annual survey of insulated properties by the following February. Report results of survey to Noise and Track Sub-Committee.	Ongoing
4.3	We will offer households exposed to levels of noise of 69dB $L_{Aeq\ 16h}$ or more assistance with the cost of moving.	Ground/ Departure/ Arrival Noise	Ongoing	Evidence in AMR.	Residents within 69dB L_{AEQ}	Continue to offer assistance.	Ongoing - no properties within this contour.
4.4	We will work with community stakeholders to develop a plan to protect quiet areas as defined by UK Government policy.	Ground/ Departure/ Arrival Noise	2020	Evidence of Plan.	Residents within and beyond 55dB L_{den}	Develop a plan by 2020 and ensure this is protecting quiet areas.	Incomplete - new target to complete by end of 2023.
4.5	Through the Airspace Change Process we will ensure areas identified as 'quiet areas' are preserved as far as possible. 'Quiet Areas' will be defined and assessed as per government legislation.	Ground/ Departure/ Arrival Noise	Ongoing	Stages in CAP 1616 process.	Residents within and beyond 55dB L_{den}	Preserve quiet areas through Airspace Change Process as far as possible.	Ongoing
4.6	We will work with local authorities to raise awareness of the impacts of siting new developments that may be affected by aircraft noise.	Ground/ Departure/ Arrival Noise	Ongoing	Local Planning Group meeting minutes.	N/A	Increase awareness for local authorities through our Local Planning Group.	Ongoing
4.7	Develop a strategy to reduce the area of the noise contours for daytime and night-time noise.	Ground/ Departure/ Arrival Noise	2021	Evidence of Strategy	Residents within 55dB L_{AEQ} or 48dB L_{den}	Reduce contour size to 15.2km2 for the area exposed to >57dB Leq16hr (0700-2300) and above. Reduce contour size to 31.6 km2 for the area exposed to >48dB Leq8hr (2300-0700) and above.	Ongoing

TABLE 36: WORKING WITH THE LOCAL COMMUNITY AND INDUSTRY PARTNERS

Ref:	Action	Impact	Timescale	Performance Indicator	Numbers Affected	Target	Progress to date
5.1	Carry out biennial surveys of local communities to seek feedback on our approach to noise management and our complaints service for continual improvement and to offer the ability for local communities to help shape the future of noise controls.	Community relationship	2019 / 2020	Results of survey.	N/A	Carry out first survey in 2019 to define baseline and set improvements in 2020.	Incomplete - new target, to complete survey by end of 2023.
5.2	We will improve communications through regular updates to our website, noise blog, community newsletters (Inform) and reports.	Community relationship	Ongoing	Evidence of comms. on website.	N/A	Review website annually and publish newsletter bi-monthly.	Ongoing
5.3	We will positively respond to requests for meetings with airport representatives regarding aircraft noise, airspace modernisation and expansion plans*.	Community relationship	Ongoing	Minutes of meetings.	N/A	Engage proactively with any visitors to the airport, as well as visiting local residents.	Ongoing - virtual and in person meetings held in 2022.
5.4	We will regularly organise public drop in sessions in locations surrounding the airport for community members to visit and speak to airport employees about noise management.	Community relationship	Ongoing	Evidence in QMR and AMR.	N/A	Organise and attend at least 6 Public Surgery drop-In events each year.	Ongoing - 5 Public Surgeries held in 2022.
5.5	We will log all enquiries and complaints relating to airport operations and publish complaint statistics in our QMR & AMR.	Community relationship	Ongoing	Evidence in QMR and AMR.	N/A	Regularly publish statistics in monitoring reports on quarterly and annual basis.	Ongoing
5.6	We will annually monitor the Noise Action Plan (NAP) actions with LLACC and where we recognise that further improvements can potentially be achieved, we will look to address it.	Community relationship	Ongoing	Evidence in AMR.	N/A	Publish NAP update in the AMR annually.	Ongoing
5.7	We will give the public access to our online noise and track monitoring system (TraVis) and work with the supplier to enhance future functionality.	Community relationship	Ongoing	Evidence of TraVis website.	N/A	Maintain and enhance functionality of TraVis system.	Ongoing
5.8	We will divert all money raised from noise and track violations penalty schemes into the Community Trust Fund (CTF).	Community relationship	Ongoing	Evidence in annual Community Strategy and AMR.	N/A	Annually publish the amount of money diverted to the CTF.	Ongoing - £60,000 diverted to CTF in 2022.
5.9	We will produce and publish Quarterly Monitoring reports to inform Stakeholders of performance trends and noise management at London Luton Airport.	Community relationship	Ongoing	QMR published on website.	N/A	Publish reports on our website at earliest opportunity each quarter.	Ongoing
5.10	We will continue to present summer and annual noise contours within our Annual Monitoring Report.	Community relationship	Ongoing	Evidence in AMR.	N/A	Publish contour statistics in Annual Monitoring Reports.	Ongoing
5.11	We will continue to produce and publish an Annual Monitoring Report to inform stakeholders of performance trends and noise management at London Luton Airport.	Community relationship	Ongoing	AMR published on website.	N/A	Publish AMR on our website by 31st May each year.	Ongoing - Merged with Sustainability Report from 2022.
5.12	We will engage proactively with LLACC and NTSC to identify initiatives which will help minimise noise in our local community.	Community relationship	Ongoing	Minutes of Meetings.	N/A	Meet with LLACC and NTSC every 3 months.	Ongoing
5.13	We will collaborate with our Flight Operations Committee (FLOPC) to determine new initiatives to reduce noise.	Community relationship	Ongoing	Minutes of FLOPC meetings.	N/A	Engage proactively with FLOPC at meetings held twice a year.	Ongoing

Appendix 14: Community Engagement

TABLE 37: COMMUNITY INVESTMENT PROJECTS, AMOUNT AND LOCATION

Investment stream and Initiatives	Amount	Local authority area	Location
Community Trust Fund	£150,000.00		
Amicus Trust	£10,000.00	Central Bedfordshire	Multiple locations across Bedfordshire
Barrel Organ	£8,710.00	Central Bedfordshire	Leighton Linslade
Cancer Hair Care	£9,994.00	Multiple	
CHAT Children's respite charity	£6,000.00	Aylesbury Vale	Aylesbury
Chilterns MS Centre	£5,000.00	Multiple	
Codicote Tennis Club	£5,000.00	Central Bedfordshire	Codicote
Country Days Ltd	£3,000.00	Central Bedfordshire	
Give. Help. Share.	£7,857.00	Stevenage	Stevenage
GRIT; Growing Resilience in Teens	£9,464.00	North Herefordshire	Hitchin
Happy Days Children's Charity	£6,766.00	Luton	Luton
Headway Hertfordshire Limited	£3,000.00	St Albans	St Albans
Hitchin Scouts	£3,500.00	North Herefordshire	Hitchin
Kids in Action	£6,000.00	Central Bedfordshire	Dunstable
Kids Out	£5,000.00	Multiple	Leighton Buzzard
Leighton Linslade Helpers	£9,391.00	Central Bedfordshire	Leighton Buzzard
Mediation Hertfordshire	£5,000.00	Stevenage	Stevenage
MERU	£6,690.00	Stevenage	Stevenage
The Cricket Society Trust	£4,200.00	Central Bedfordshire	
The Hygiene Bank Luton	£9,900.00	Luton	Luton
The PathwaySTILL Community Interest Company	£4,706.00	Central Bedfordshire	Hitchin
Trinity Community Project	£8,485.00	St Albans	St Albans
VegBox Donation Scheme	£2,649.00	Central Bedfordshire	Potton
Youth Concern (Aylesbury)	£9,688.00	Aylesbury Vale	Aylesbury

Appendix 15: Surface Access

TABLE 38: SURFACE ACCESS STRATEGY

Target	Description of project	2022 Target	2022 Actual
1A	Reduce employee single occupancy vehicle (SOV) travel	64%	75%
1B	Reduce passenger private car travel	47%	43%
2A	Increase employee travel by sustainable modes of transport	28%	21%
2B	Increase passenger travel by sustainable modes of transport	33%	34%
3A	Secure participation in the staff travel survey	12% (2,000 total staff)	12.16%
3B	Increase the number of organisations attending the Airport Transport Forum (ATF)	13+	14

FIGURE 10: MAP SHOWING CAR PARKS AT THE AIRPORT.

There are four on-airport car parks at LLA; Terminal Car Parks 1&2 (TCP1 and TCP2), the Mid Stay Car Park and the Long Stay Car Park.
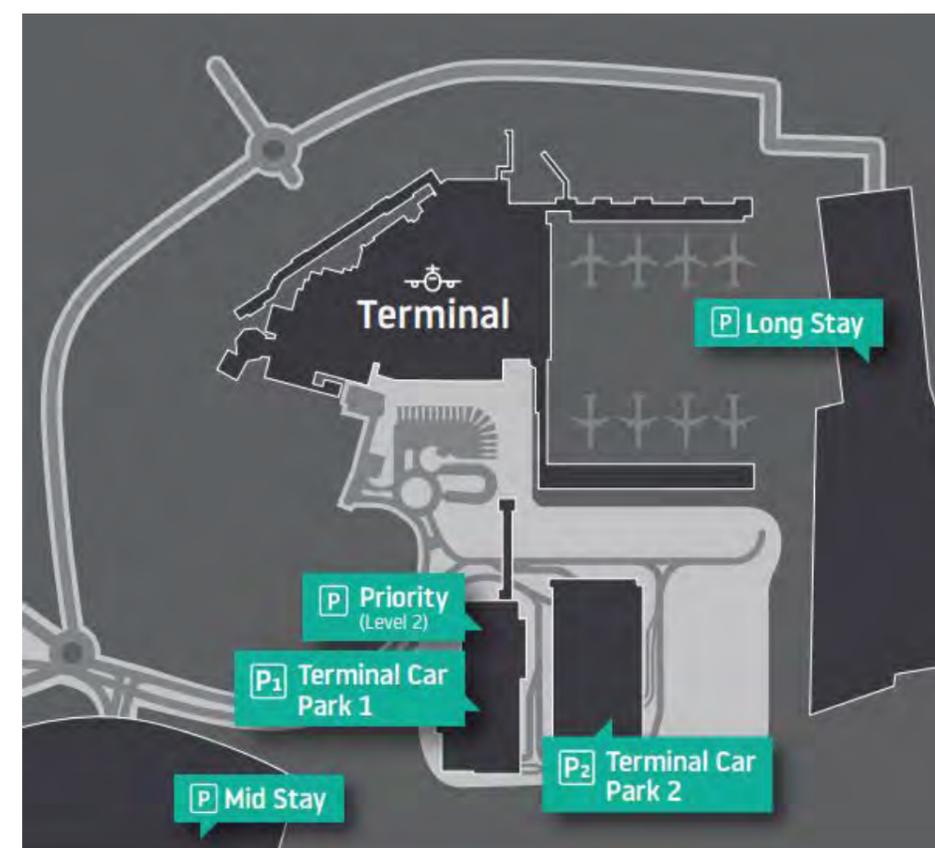
TABLE 39: CAR PARK LOCATIONS AND TOTAL SPACES

Car park	Number of spaces
Passenger - Terminal Car Park 1 (TCP1)	1,699
Passenger - Terminal Car Park 2 (TCP2	1,924
Passenger - Mid Stay	1,651
Passenger - Long Stay	4,151
Drop Off Zone	96
Total Passenger	9,521
Other - Priority Parking	802
Total Other	802

Staff - Executive	101
Staff - Car Park B	555
Staff - Car Park 7	110
Staff - Building 134	50
Total Staff	816

FIGURE 11: NUMBER OF PRE-BOOKINGS PER MONTH DURING 2022 FOR PASSENGER CAR PARKS

Car Parking Transactions
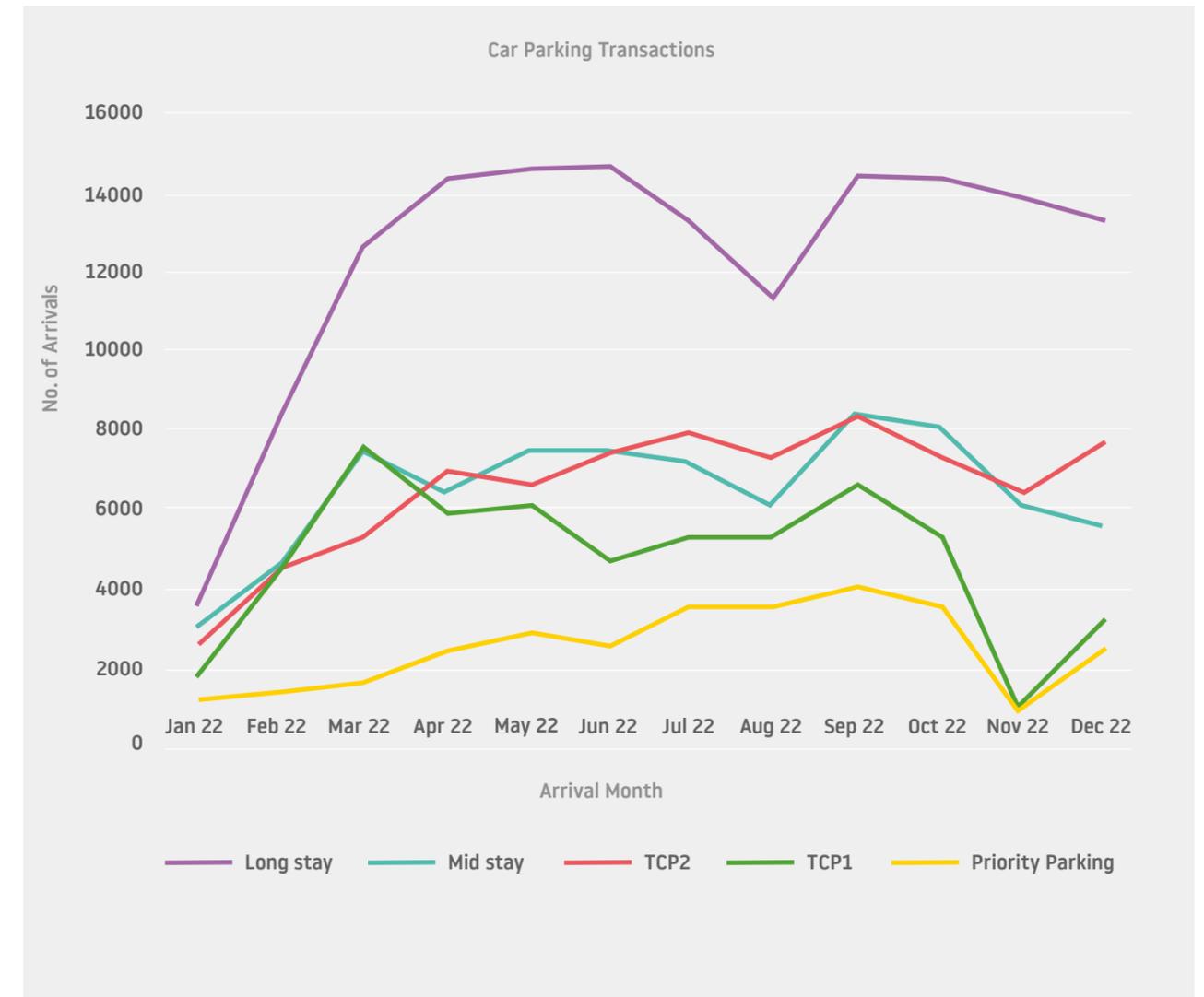
Appendix 16: Air Quality

Figure below shows the 24-hour average time series of PM10 measured by the BAM monitor at LLA in 2022. There were no exceedances of the PM10 24-hour objective.

FIGURE 12
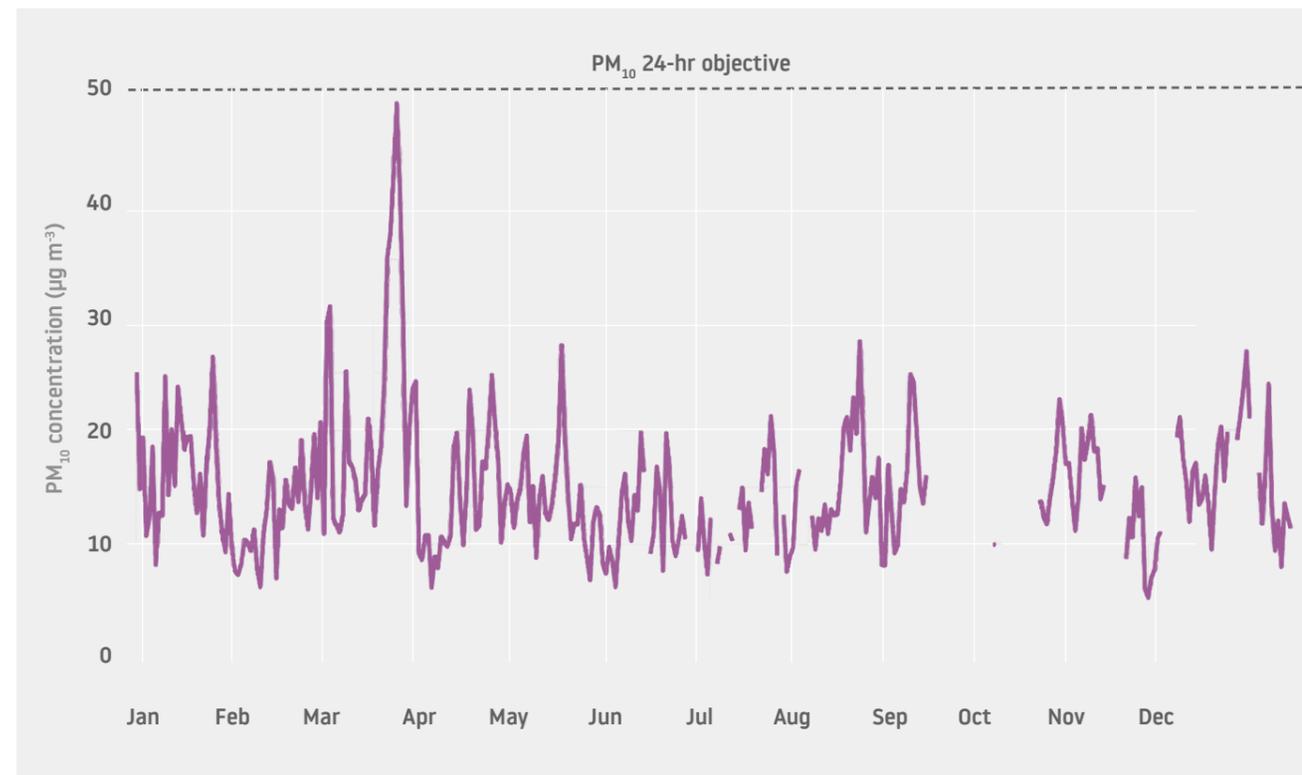
Figures below show the NO2 annual mean concentrations from the diffusion tube monitoring programme from 2013 to 2022 for the (1) airfield (2) Runway and under flight paths (3) Car parks and drop-off zones (4) Access roads. The dashed line at 40 μm m-3 represents the annual mean NO2 AQS objective

FIGURE 13

FIGURE 14

FIGURE 15

Car parks and drop-off zones

FIGURE 16

Access Roads
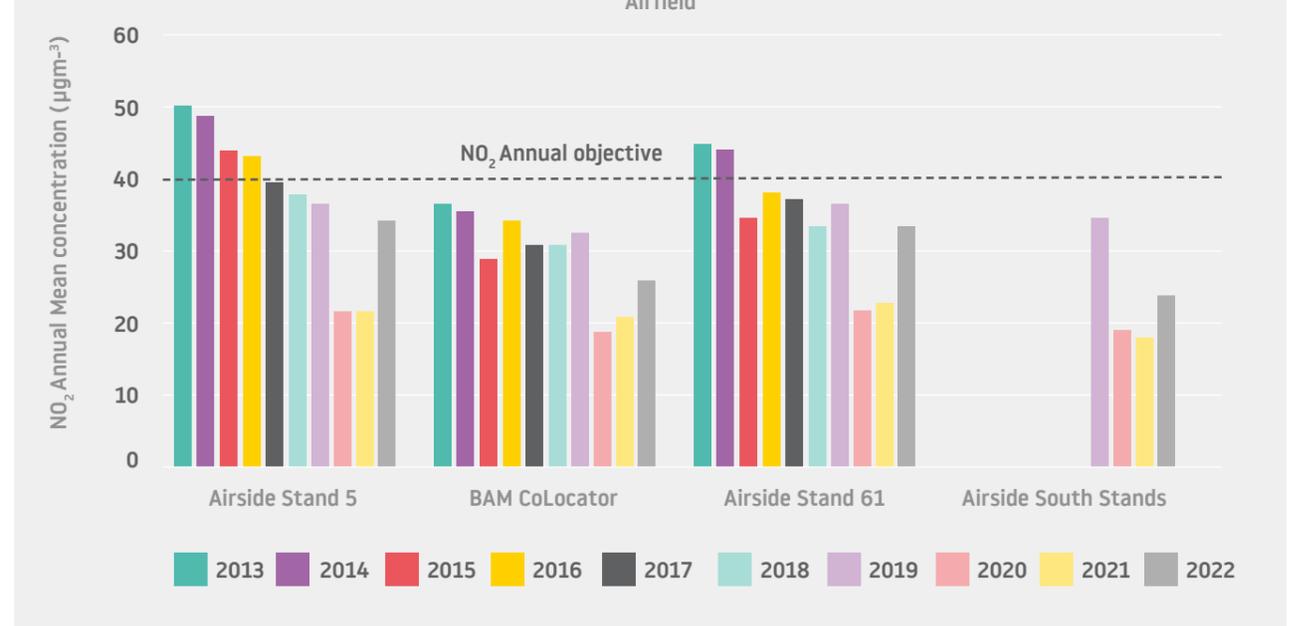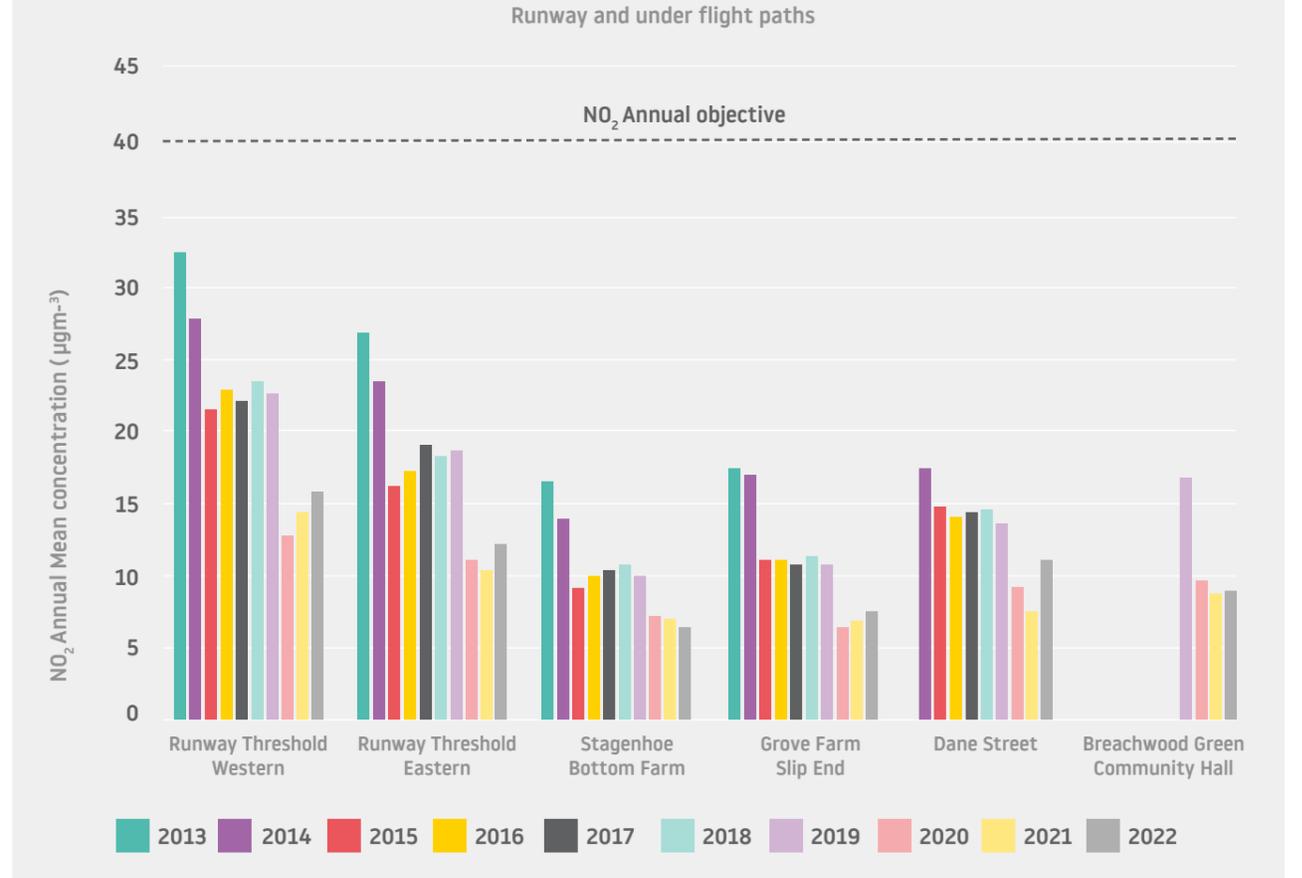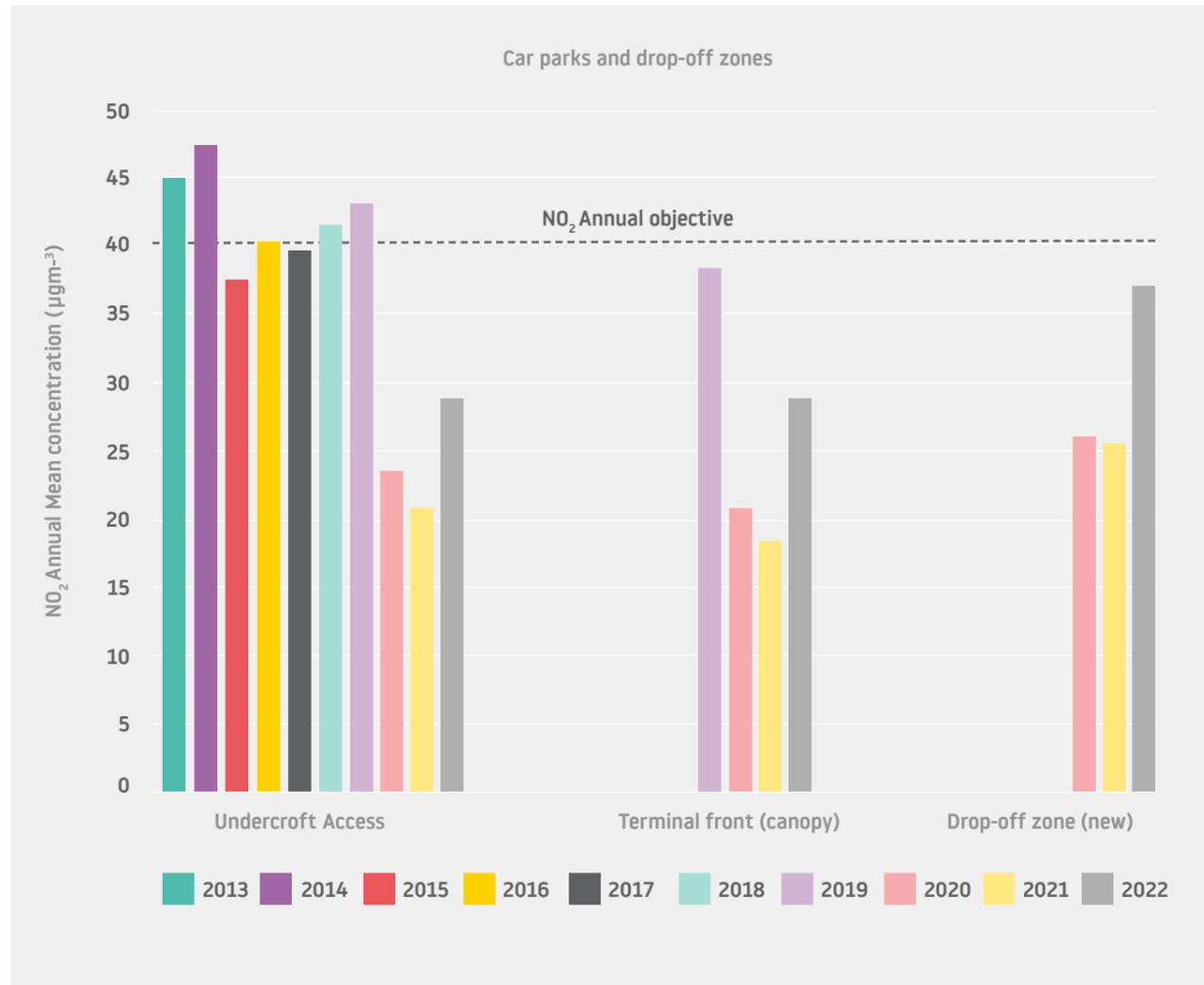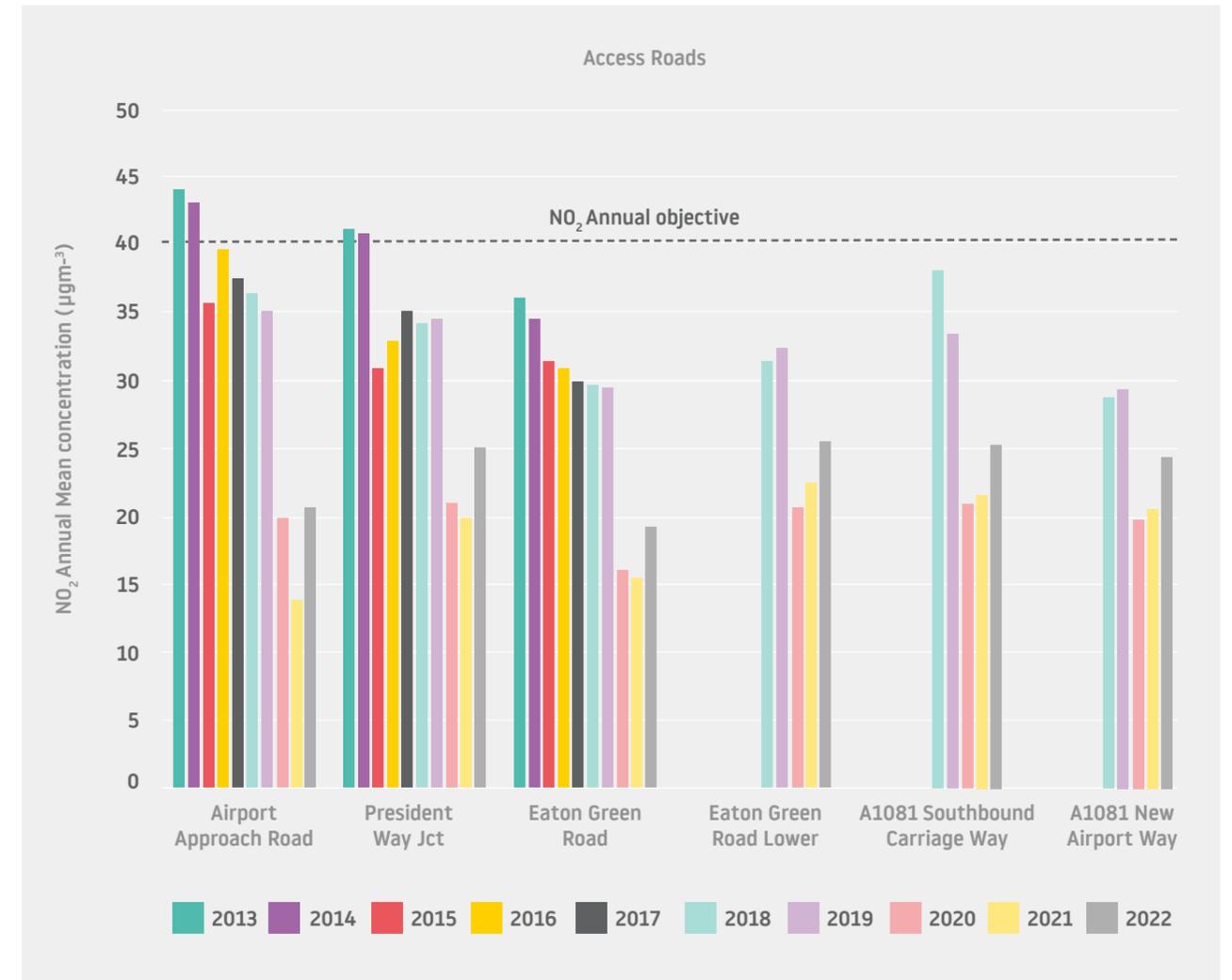
Appendix 17: CARBON EMISSIONS

TABLE 40: LOCATION BASED

|	2015	2016	2017	2018	2019	2020	2021	2022
Scope 1 (tCO$_2$e)	2,885	2,917	2,899	3,189	2,965	2,325	2,299	2,372
Airport de-icer (tCO$_2$e)	-	-	-	-	-	-	-	-
Natural gas (tCO$_2$e)	1,904	1,802	1,611	1,650	1,562	1,349	1,492	1,307
Fuel (airport vehicles) (tCO$_2$e)	804	938	1,048	1,102	1,137	536	447	773
Gas oil (heating and power) (tCO$_2$e)	177	177	240	225	203	129	192	184
Refrigerants (tCO$_2$e)	-	-	-	212	55	309	162	102
Fire training (tCO$_2$e)	-	-	-	-	8	2	6	6
Scope 2 (tCO$_2$e)	17,364	14,910	12,912	10,184	4,981	3,418	3,538	4,045
Electricity - airport use (tCO$_2$e)	17,364	14,910	12,912	10,184	4,981	3,418	3,538	4,045
Scope 3 (tCO$_2$e)	-	-	-	292,511	288,453	115,213	96,747	221,118
Aircraft movements (tCO$_2$e)	-	-	-	137,603	146,329	66,789	59,372	115,162
Passenger surface access (tCO$_2$e)	-	-	-	152,286	131,923	41,859	29,857	94,176
Electricity - tenant use (tCO$_2$e)	-	-	-	-	4,325	2,706	2,211	1,918
Electricity - WTT (tCO$_2$e)	-	-	-	-	-	-	1,630	1,557
Staff commuting (tCO$_2$e)	-	-	-	1,428	1,010	436	680	931
Electricity T&D losses (tCO$_2$e)	-	-	-	868	790	527	509	546
Fuel (third-party vehicles) (tCO$_2$e)	-	-	-	-	3,179	1,592	1,505	2,621
Non-road construction (tCO$_2$e)	-	-	-	-	-	-	-	62
Third-party de-icer (tCO$_2$e)	-	-	-	-	-	-	101	188
Aircraft engine tests (tCO$_2$e)	-	-	-	-	608	266	85	1,832
Water (tCO$_2$e)	-	-	-	133	136	54	19	45
Business travel (tCO$_2$e)	-	-	-	145	103	39	4	101
Waste (tCO$_2$e)	-	-	-	48	50	945	774	1,979
Total (tCO$_2$e)	20,249	17,827	15,811	305,884	296,399	120,956	102,584	227,535

TABLE 41: MARKET BASED

	2015	2016	2017	2018	2019	2020	2021	2022
Scope 1 (tCO$_2$e)	2,885	2,917	2,899	3,189	2,965	2,325	2,299	2,372
Airport de-icer (tCO$_2$e)	-	-	-	-	-	-	-	-
Natural gas (tCO$_2$e)	1,904	1,802	1,611	1,650	1,562	1,349	1,492	1,307
Fuel (airport vehicles) (tCO$_2$e)	804	938	1,048	1,102	1,137	536	447	773
Gas oil (heating and power) (tCO$_2$e)	177	177	240	225	203	129	192	184
Refrigerants (tCO$_2$e)	-	-	-	212	55	309	162	102
Fire training (tCO$_2$e)	-	-	-	-	8	2	6	6
Scope 2 (tCO$_2$e)	17,364	14,910	12,912	13,690	6,772	5,059	1,332	-
Electricity - airport use (tCO$_2$e)	17,364	14,910	12,912	13,960	6,772	5,059	1,332	-
Scope 3 (tCO$_2$e)	-	-	-	292,511	290,008	98,258	80,547	219,200
Aircraft movements (tCO$_2$e)	-	-	-	137,603	146,329	48,506	44,988	115,162
Passenger surface access (tCO$_2$e)	-	-	-	152,286	131,923	41,859	29,857	94,176
Electricity - tenant use (tCO$_2$e)	-	-	-	-	5,880	4,034	779	-
Electricity - WTT (tCO$_2$e)	-	-	-	-	-	-	1,630	1,557
Staff commuting (tCO$_2$e)	-	-	-	1,428	1,010	436	680	931
Electricity T&D losses (tCO$_2$e)	-	-	-	868	790	527	125	546
Fuel (third-party vehicles) (tCO$_2$e)	-	-	-	-	3,179	1,592	1,505	2,621
Non-road construction (tCO$_2$e)	-	-	-	-	-	-	-	62
Third-party de-icer (tCO$_2$e)	-	-	-	-	-	-	101	188
Aircraft engine tests (tCO$_2$e)	-	-	-	-	608	266	85	1,832
Water (tCO$_2$e)	-	-	-	133	136	54	19	45
Business travel (tCO$_2$e)	-	-	-	145	103	39	4	101
Waste (tCO$_2$e)	-	-	-	48	50	945	774	1,979
Total (tCO$_2$e)	20,249	17,827	15,811	309,390	299,745	105,678	84,178	221,572

FURTHER INFORMATION

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