



London Luton Airport

Carbon Reduction Strategy Performance

2025

The following constitutes London Luton Airport Operation Limited's ("LLA") annual review for 2025 in respect of its Carbon Reduction Strategy in accordance with its planning permission and the related s106 agreement.

No.	Category	Emission Source	Short Term Target (to 2025)	2025 Progress
1	Infrastructure	Natural gas	Feasibility study on low carbon heating options (e.g., air/ground source heat pumps, hydrogen etc.) in 2023	A feasibility study on low carbon heating options was completed in 2022 to understand how this technology can be implemented across the airport site.
2	Infrastructure	Refrigerants	Refrigerant usage plan implemented in 2025	A refrigerant use policy has been developed and was implemented in 2025. The policy applies to all refrigerant systems that utilise F-gases.
3	Infrastructure	Emergency generators	Diesel use reduced by using low carbon fuels (where feasible) by 2025	Diesel use was reduced in 2025 using low-carbon fuels where LLA trialed HVO within airport & airfield emergency generators. The trial was successful and further rollout planned.
4	Infrastructure	LLAOL vehicles	Begin transitioning to low-carbon vehicles by introducing low-carbon fuels and planning for transition to electric alternatives	LLA continues to transition to low-carbon vehicles with 86% of LLA owned vehicles now being low-carbon (HVO & Electric).
5	Aviation	De-icer	Continue to implement forced-air and blend-to-temperature de-icing methods (or similar) to improve efficiency and reduce deicer use	LLA continued to work towards implementing forced-air and blend-to-temperature methods to improve efficiency and reduce the amount of deicer used during de-icing operations.
6	Infrastructure	Electricity	Continue to purchase 100% of electricity from renewable sources as determined through contracts	LLA continued to procure 100% of electricity from renewable sources through the Renewables Guarantee of Origin (REGO) scheme in 2025.
7	Infrastructure	Electricity	Request planning permission or explore permitted development rights for a solar farm onsite adjacent to the runway	No planning permission was required for the development of an on-site solar farm, for which enabling works commenced in 2025 and construction planned to commence in 2026.
8	Infrastructure	Electricity	Ongoing equipment replacement to be continued (energy efficiency)	Following a site-wide audit in 2022, LLA developed a 5-year energy efficiency plan. In 2025, LLA continued to implement projects to improve energy efficiency as part of this plan and is continuing to collaborate with experts and operational teams to identify and implement further energy saving measures.

No.	Category	Emission Source	Short Term Target (to 2025)	2025 Progress
9	Aviation	Aircraft main engine	Report percentage of based aircraft that are next generation, against a benchmark of 40% next generation by 2023	LLA reports on the percentage of based aircraft in the annual Sustainability Report. In 2025, LLA achieved 62.5% next generation-based aircraft, with a further increase in next-gen proportion expected in coming years.
10	Aviation	Aircraft main engine	Engage with airlines to discuss measures to reduce emissions such as SAF uptake, operational efficiency and introducing new generation aircraft	LLA holds regular meetings with airline partners to discuss measures to reduce emissions and other sustainability initiatives. LLA also collaborates with Government and the wider industry through various forums, including the Sustainable Aviation trade body.
11	Aviation	Aircraft main engine	Continue to review emerging information on new technologies	LLA continues to review emerging information on future flight technologies, including through engagement with industry and academia. This includes a Memorandum of Understanding with Cranfield University, signed in 2024 to explore opportunities for research and feasibility studies on future flight technologies.
12	Aviation	Aircraft main engine	Update departure procedures to facilitate modernisation of the airspace (subject to CAA approval)	Departure procedures are still planned to be updated; however, this is delayed while new regulatory frameworks for airspace redesign are created, which LLA is supporting by responding to CAA consultations.
13	Aviation	LTO	Proactively engage with airlines to encourage implementation of the DCOP	Departures Code of Practice (DCOP) implementation is encouraged through regular communications, notices, and targeted discussions with operators.
14	Aviation	LTO	Proactively engage with airlines to encourage implementation of the ACOP	Arrivals Code of Practice (ACOP) implementation is encouraged through regular communications, notices, and targeted discussions with operators.
15	Aviation	LTO	Proactively engage with airlines to encourage delayed landing gear deployment, in line with the requirements of the Noise Action Plan	As set out in LLA's Noise Action Plan, LLA continues to engage with aircraft operators to encourage delayed landing gear deployment (no earlier than 5nm where safely and operationally feasible) through regular communications, notices, and targeted discussions.
16	Aviation	Maintenance (run-up)	Continue night-time ban on engine testing and enforcement of time-based charging for engine testing	No night-time engine testing took place in 2025 within restricted night period. Enforcement of time-based charging continued in 2025.

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17	Aviation	APU	Engage with operators each year regarding minimising APU usage in line with the ACOP/DCOP, including considering technology options (e.g., low-carbon fueled GPUs, FEGP, PCA)	In line with ACOP & DCOP, APU usage is minimised to 30 minutes prior to departure, and 5 minutes following arrival. Airside Operations team conducted Points of Engagement. Operators are encouraged to use Ground Power Units (GPUs) as an alternative to APU which are now using Low-Carbon Fuel from April 2025.
18	Aviation	GSE	Continue to implement equipment pooling for GSE and associated telematics to maximise efficiency. Use pooling contract renewal to request the use low-carbon fuels (where feasible) in the short-term	LLA continues to implement equipment pooling for GSE, and the recent pooling contract renewal included a request for use of HVO in the short term where feasible, with the majority of pooled GSE equipment now using HVO. We also undertook a successful proof of concept trial testing the use of electric ground support equipment at five stands.
19	Aviation	Airside buses	Use leasing contract renewals to request capability for the use of low-carbon fuels (where feasible)	In 2025, all of LLA's own airside buses and leased car park transfer buses continued to operate on low-carbon (HVO) fuel.
20	Infrastructure	Construction	Sustainability incorporated into construction contracts (where feasible)	Minimum environmental standards for construction issued in 2025. Where feasible, compliance with these standards forms part of contractors' Service Level Agreements (SLAs).
21	Infrastructure	Solid waste processing	Targets embedded in waste management contracts, with aim of being 100% landfill free (where feasible)	Recycling and landfill diversion targets are integrated into LLA's Waste Management contract with 100% landfill free maintained in 2025 under the contract.
22	Infrastructure	Solid waste processing	Achieve 70% recycling of non-hazardous operational waste (excluding aircraft waste) by the end of 2025	Non-hazardous operational waste (excluding aircraft waste) recycling rates averaged 81% in 2025, exceeding the 75% target for 2025.
23	Infrastructure	Water	Water use plan developed	Completed a site-wide water audit in 2025, identifying further opportunities to inform the water use plan.
24	Surface Access	Business travel	Internal guidance developed in 2024 (Business Travel)	Internal business travel policy developed, encouraging staff to consider virtual meetings where possible and offering guidance to reduce the emissions and environmental impacts of travel when required.
25	Surface Access	Staff	The strategy will reflect working towards a target of 35% sustainable transport mode share for employees in 2024	Airport Surface Access Strategy and associated travel plan published in 2024, which includes communication of sustainable mode options to staff and improvements to local transport services to work better around staff shift patterns.

No.	Category	Emission Source	Short Term Target (to 2025)	2025 Progress
26	Surface Access	Passenger	The strategy will reflect working towards a target of 47% sustainable transport mode share for passengers in 2024	Airport Surface Access Strategy and associated travel plan published in 2024, which includes measures such as strengthening the provision and visibility of public transport options, introducing new fare options, and further understanding passenger travel behavior.
27	Surface Access	Staff and passenger car/taxi	Develop an EV Transition Roadmap by 2025. This will consider electricity capacity requirements and provide flexibility to meet various user needs by exploring options such as charging hubs, valet park and charge, and mobile charging services	EV transition roadmap developed, which includes review of electricity capacity requirements for various user needs and feeds into the wider EV transition roadmap.
28	Surface Access	Staff	Implement EV Salary Sacrifice Scheme to trial this initiative	EV salary sacrifice scheme introduced via Octopus and now has 75+ staff enrolled.
29	Surface Access	Passenger	Review strategies for car-parking allocation, consider preferential parking for electric or hybrid vehicles and higher charges for high emissions vehicles.	Drop-off tariff reduced for fully electric vehicles using Terminal Car Park 1, providing preferential parking for these vehicles for up to 30 minutes close to the terminal. Ongoing review of further opportunities to provide preferential parking for electric or hybrid vehicles.
30	Surface Access	Passenger taxi	Taxi contracts updated on renewal to encourage transition to electric vehicles and a minimum requirement of Euro 6. Provide discount incentive on annual fee for use of electric taxi	All taxis licensed to operate at the taxi forecourt at the Airport are required to meet Euro VI standards at minimum. Contracts provide a discount on the annual fee for fully electric taxis, to encourage the transition to electric vehicles. 33 of the 134 licensed taxis operating from the Airport are now fully electric.
31	Surface Access	Passenger bus/coach	No idling zone implemented in 2023	No idling zone introduced for coaches and buses in the CTA in May 2022, enforced via signage and Parking Charge Notices for non-compliance.
32	Surface Access	Passenger coach	Explore opportunities for tenders to include Euro 6 as minimum requirement and rebates for conversion of fleets to low/zero carbon alternatives	Coach tenders require all fleets to meet Euro VI standards as a minimum. All operators serving the Airport adhere to this requirement.

Following independent audit and verification of the Airport's carbon management and performance, Airport Carbon Accreditation (ACA) Level 4 Certification for London Luton Airport is attached to demonstrate compliance with condition 19 of Planning Permission 21/00031/VARCON, which requires independent verification annually, as well as three yearly independent verification and audit by ACA.

CERTIFICATE of ACCREDITATION

Valid until 12th May 2029

This is to certify that *Airport Carbon Accreditation*, under the administration of Environmental Minds, confirms that the carbon management processes at

LONDON LUTON AIRPORT

Implemented by London Luton Airport Operations Limited



have earned the accreditation of **LEVEL 4**, in recognition of the airport's exceptional work in aligning its carbon management with global climate goals to reach absolute emissions reductions and establishing related partnerships with its business partners, as part of the Global airport industry's response to the challenge of Climate Change.



www.airportcarbonaccreditation.org

A handwritten signature in blue ink, appearing to read "O. Jankovec".

Olivier Jankovec
Director General
ACI EUROPE

A handwritten signature in blue ink, appearing to read "P. Karamanos".

Panagiotis Karamanos
Programme Director
Environmental Minds