Sustainability report

2024

Contents

Image: Tennyson Road School

Introduction from our CEO

Welcome to our 2024 Sustainability Report – the first for our new three-year Responsible Business Strategy cycle.

As one of the UK's busiest airports, London Luton Airport (LLA) is a gateway to Europe, connecting people and businesses. Yet, we are equally dedicated to creating lasting benefits closer to home, supporting local communities, driving economic growth, and managing our environmental impact.

This report marks an exciting milestone as we continue to build on our foundation of environmental management and meaningful social impact.

Our vision for LLA is to be simple to use and friendly, whilst seeking to improve our sustainability management. I'm delighted to be able to share some of the highlights of our work in 2024 that seeks to work towards these goals, creating positive social impact across our community and tackling key environmental impacts, including climate change and noise.

In 2024, we spent £110 million with businesses within a 25-mile radius, representing 60% of our total annual supply chain spend. We are now working with more local suppliers than ever. Last year, 70 local businesses were added to our approved supplier list, meaning that over 320 local businesses are now providing vital works, goods and services to our operation.

This investment cements LLA's position as a key economic driver, contributing £830 million to Luton's economy, £1.3 billion to the Six Counties region (Bedfordshire, Hertfordshire, Buckinghamshire, Cambridgeshire, Oxfordshire and Essex), and £1.8 billion nationally.

In 2024, we delivered another year of operational excellence, strong financial performance, and an outstanding passenger experience, culminating in our highest ever customer satisfaction scores and recognition as Best European Airport (10-25 million passengers) at the ACI EUROPE Airport Awards.

Receiving this prestigious award was an incredibly proud moment for everyone associated with the airport, with a range of achievements and key milestones highlighted by the ACI judging panel including:

- Achieving Level 4 'Transformation' of the ACI Airport Carbon Accreditation programme, another key step towards our ambition to achieve Net Zero[1] for our airport emissions by 2040.

- Demonstrating remarkable resilience following the major car park fire in October 2023.

- The success of the Luton Airport Express and DART rail services, a result of close collaboration with our transport partners, significantly reducing carbon emissions while enhancing LLA's connectivity.

- Establishing collaborative approaches with key partners.

Our airport-wide commitment to delivering a first-class passenger experience was also recognised at the 2024 UK Customer Experience™ (CX) Awards, where LLA won the Team of the Year Award (large company) and received the Gold Award for Best Customer Experience for Vulnerable Customers, recognising our services for passengers requiring assisted travel.

Across the airport, we have also continued to invest in passenger facilities. This included the completion of a £20 million refurbishment of our security hall, positioning LLA as one of the first major airports to feature state-of-the-art, next-generation body scanners and CT scanner technology.

In addition, Jet2 has chosen LLA as its latest UK base for summer 2025, flying to 17 sunshine destinations, creating around 125 new jobs. To support this growth, Jet2 will base two new Airbus A321neo aircraft at the airport, which are quieter and more fuel-efficient than older models, meaning we now have the highest proportion of next generation Airbus neo and Boeing Max aircraft of any major European airport.

Improving sustainability remains at the heart of our strategy, and maintaining best-in-class environmental, social and governance (ESG) performance is a key priority. We were therefore proud to achieve a 100% score, a five-star rating, and sector leader status for the third consecutive year in the Global Real Estate Sustainability Benchmark (GRESB) assessment, an independent, international framework that benchmarks major organisations on ESG excellence.

As part of our commitment to Net Zero airport operations, we have set targets to implement a 100% low-carbon[2] vehicle fleet by 2030. This objective took another decisive step last year in the form of a multi-million-pound investment in a fleet of low-carbon car park transfer buses and operational vehicles.

We recognise that our ongoing success is intrinsically linked to the prosperity of the local area and we are committed to playing an instrumental role in creating meaningful opportunities for local people. We completely support Luton Council's 2040 vision of a healthy, fair and sustainable town where everyone can thrive, and no-one has to live in poverty.

In 2024, LLA joined forces with The Forest of Marston Vale Trust to launch a hugely successful environmental education programme aimed at local primary school children. This partnership, along with the launch of our new Essential Skills Workshops, are just two examples of our broader programme of skills, education and outreach programmes, aligned to our Classroom to Careers roadmap and the Council's 2040 vision.

Our aim is to reach 2,000 students annually, providing a variety of interventions throughout a student's school journey, equipping them with skills, opportunities and career insights that will one day help them to thrive in the workplace.

At the time of writing, LLA received Government approval to expand to 32 million passengers per year. This development presents significant opportunities, including the creation of up to 11,000 new jobs and an additional £1.5 billion in annual economic benefits by the mid-2040s. However, with this growth comes greater responsibility, including a legally binding and independently assessed framework to manage the impact of airport operations.

As we plan for the future, this report provides deeper insight into our sustainability strategy, detailing the progress we have made to date and the ambitious targets we are striving toward. Through these efforts, we remain committed to delivering a simple, friendly, and more sustainable passenger experience for everyone who travels through London Luton Airport.

Alberto Martin
CEO, London Luton Airport

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1. Net Zero for airport emissions includes Scope 1 - emissions sourced and controlled directly by LLA and Scope 2 - emissions indirectly emitted by LLA and sourced from the production of electricity on the national grid.

2. Low-carbon includes the use of Electric Vehicles and HVO as fuel for vehicles.

About London Luton Airport

London Luton Airport (LLA) is the fifth biggest and one of the UK's busiest airports, serving over 16.7 million passengers in 2024. It serves 127 destinations across Europe, Africa and Asia.

LLA is committed to delivering a simple and friendly travel experience for the millions of passengers who choose to travel through the airport each year, while also driving improved 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.

LLA is unique in that our freeholder, Luton Rising, is owned by Luton Council and the airport is 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.

LLA works in collaboration with Luton Council and Luton Rising and engages closely with our neighbours, local residents and regional policy makers. This public-private model enables us to enact good practices to mitigate our impacts as a neighbour and ensure we are delivering meaningful and enduring benefits for local communities.

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. At the time of writing LLA has just received Government approval to expand the airport's capacity to 32 million passengers per year.

We have developed a comprehensive and refreshed Responsible Business Strategy that aligns with Luton Council's 2040 vision and sustainability objectives. Working as a responsible business partner, we strive to balance our stakeholders' varied interests for sustainable outcomes.

As a business owned by the world's leading airport operator and a global investor, we take our broader corporate responsibilities seriously. From building positive relationships with employees, partners and stakeholders, to managing our environmental impacts and creating an exceptional passenger experience for all.

As operator of one of the UK's busiest airports, we're committed to working toward shaping a more sustainable future and mitigating the environmental impact of our operations on our people, our community, and of course, our environment. We acknowledge that there are negative environmental impacts from the airports operations, we as a business are striving to reduce those impacts through the development of this ambitious and forward looking strategy.

An airport for community benefit: Luton Rising

Luton Rising owns assets including London Luton Airport, the Luton DART and other commercial interests, solely for community benefit, through its sole shareholder Luton Council.

Our ownership of the airport reflects our full commitment to supporting and improving people's lives while driving economic and employment growth in Luton and neighbouring communities. As such, the airport is a key partner in Luton Council's bold 2040 vision for a healthy, fair and sustainable town where everyone can thrive.

Through our ownership, and unique partnership with the airport operator, London Luton Airport is the UK's most socially impactful airport, and we remain committed to being so. Each passenger helps us generate industry-leading community investment which has already exceeded £500 million.

Our future growth plans will increase the airport's capacity to 32 million passengers, creating up to 11,000 new jobs and boosting the economy by up to £1.5 billion annually. These plans have been carefully consulted on and designed with local communities in mind, balancing growth with environmental responsibility while creating exciting opportunities throughout our supply chain.

At the centre of the plans is our innovative Green Controlled Growth framework which puts sustainability at the heart of everything we do, with limits on noise, emissions and environmental impacts as we grow.

We are proud to play a crucial role in delivering a more sustainable, prosperous and healthier future for the people of Luton.

Nick Platts
Managing Director, Luton Rising

A record-breaking year: welcome from Oli Jaycock

London Luton Airport is entering an exciting new phase of our Responsible Business Strategy (RBS), reinforcing our commitment to seeking more sustainable aviation and embedding ethical practices at the heart of our operations. Since launching our first strategy in 2020, we've made significant strides in transforming how we approach sustainability.

Our hard work has paid off in meaningful ways. In 2024, we were honoured to be named European Airport of the Year - a recognition that reflects our approach to managing sustainability issues. Such achievements however can only be realised through active engagement with stakeholders and support from partners, in which we've achieved impressive milestones, including:

- Reducing our airport carbon emissions by 28% since 2019.

- Recycling 82% of our waste.[3]

- Buying 60% of goods and services from within a 25-mile radius of the airport, spending £110 million.

- Raising more than £300k over four years for our two charity partners.

- Securing a £27.6 million train refurbishment programme by East Midlands Railway, operator of the Luton Airport Express.

- Becoming the only airport to achieve Level 3 in ACI's Airport Customer Experience Accreditation.

- Receiving our third consecutive global No. 1 airport ranking in the GRESB assessment, an independent, international sustainability index, earning us a 5-star ESG rating that underscores our robust sustainability management practices.

Our achievements were further highlighted by several prestigious awards, including the Green World Environment Award for Environmental Best Practice with waste management company, Cawleys, and the PRWeek UK Corporate Affairs Award for 'Best Crisis or Issues Management' for our exceptional response to the 2023 fire in Terminal Car Park 2.

To share the progress we've made in 2024, within this report we outline our performance across four essential themes: Infrastructure, Partners, Community and Teams. We've set bold commitments for the coming years, including supplying 25% of electricity at the airport through on or near-site renewable energy sources by 2026, working with our airlines with an aim to support the uptake of Sustainable Aviation Fuel (SAF) and providing pathways to a career in aviation to local young people.

We're committed to improving our environmental management practices and creating a positive social impact in our communities, and I look forward to sharing updates with you in the future.

Oli Jaycock
Corporate Affairs Director

The airport's role in the town's future[4]

Luton Council's 2040 vision is for a healthy, fair and sustainable town where everyone can thrive. London Luton Airport plays a vital role in this journey as our town's most significant economic driver.

Already providing 14,000 directly linked jobs, the airport contributes substantially to building an inclusive economy through local employment, skills development and procurement practices. The community investment of Luton Rising, the Luton Council company that owns the airport and associated assets for community benefit, is consistently 20 times higher per passenger than any other UK airport and supports many local organisations.

Looking forward, we see the airport's expansion as an opportunity to create new jobs for those who need them most, while positioning Luton as an emerging centre for green technology and research. This will create new pathways for our town's future prosperity and help meet our target of becoming carbon neutral by 2040.

Mark Fowler
Interim Chief Executive, Luton Council

Awards & accreditations by theme

Excellence in Airport Operations

ACI Europe Best Airport Awards 2024
European Airport of the year
(10-25 million passenger category)

Environmental Leadership

Global Real Estate Sustainability Benchmark (GRESB) Sector Leader and #1 Airport Globally
5-star ESG rating (third consecutive year)

Green World Environment Award
Environmental Best Practice for
waste management

GO Award
Contract and Supplier Management
(Highly Commended) for waste
initiatives with Cawleys

Transportation & Infrastructure

National Transport Award
Best Alliance/Collaboration for the Luton
Airport Express (with Luton Rising and
East Midlands Railway)

Customer Experience

ACI Customer Experience Accreditation
Level 3 Accreditation (only UK airport to
achieve this)

ACI Customer Experience Awards 2024
Team of the Year (large company)
Best Customer Experience for Vulnerable
Customers

Airport Food and Beverage (FAB) Awards 2024
European Food and Beverage Offering of
the Year

Health, Safety & Wellbeing

**ISO 45003 Psychological Health
and Safety Certification**
First airport globally to achieve Psychological
Health and Safety in the Workplace certification

RoSPA Awards 2024
Silver award

IIRSM Risk Excellence Awards 2024
Wellbeing Strategy of the Year
(Highly Commended)

Sustainability, Communications & Crisis Management

PRWeek UK Corporate Affairs Award
Best Crisis or Issues Management
for Terminal Car Park 2 fire response

PR Moment Gold Award
In-House Team of the Year

CIPR Excellence Award
Crisis Management

edie Awards 2025
Sustainability Reporting and Communications
- Finalist

Innovation & Internal Excellence

Aena *We are creative, we are Aena* Award
for the LLA Way

World Procurement Awards
Procurement Team of the Year - Finalist

UK National GO Awards
Best Procurement Delivery - Finalist

RECOGNITION

Airport Carbon Accreditation (ACA) – Transformation

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 2024 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.

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. LLA has no obligation to update any forward-looking statements contained in this Report, whether as a result of new information, future events or otherwise.

2024 Highlights

LUTON DART SHUTTLE:

2.9M PASSENGERS

IN ITS FIRST YEAR

2/3 OVER TWO-THIRDS OF LLA OPERATIONAL VEHICLE FLEET ARE NOW LOW-CARBON[6]

GRESB INFRASTRUCTURE sector leader 2024

GRESB GLOBAL SECTOR LEADER

FOR THREE CONSECUTIVE YEARS IN ESG MANAGEMENT AND PERFORMANCE

ACI EUROPE BEST EUROPEAN AIRPORT AWARD 2024

ACI BEST EUROPEAN AIRPORT 2024

1

IN THE 10-25 MILLION PASSENGER CATEGORY

82%

AVERAGE RECYCLING RATE[5]

FIRST AIRPORT TO ACHIEVE THE ISO 45003 CERTIFICATION

PSYCHOLOGICAL HEALTH AND SAFETY AT WORK

OVER

28%

REDUCTION IN AIRPORT CARBON EMISSIONS VS 2019[6]

CONTINUING TO BE A LEADER IN

NEXT GENERATION AIRCRAFT

60% OF AIRCRAFT BASED AT LLA ARE NOW NEXT GENERATION

RECORD CUSTOMER EXPERIENCE SCORE

ONLY UK AIRPORT TO ACHIEVE LEVEL 3 IN ACI CUSTOMER EXPERIENCE ACCREDITATION WITH A RECORD 4.07 AIRPORT SERVICE QUALITY SCORE IN 2024

60% OF SUPPLY CHAIN SPEND WITHIN 25-MILE RADIUS WITH DIRECT SPEND OF £110 MILLION IN 2024

LOCAL SPEND

100% OF LLA OPERATED CAR PARKS HAVE LED LIGHTING AND TRANSFER BUSES ARE 100% LOW-CARBON[7]

£300K+ RAISED

FOR OUR TWO CHARITY PARTNERS OVER

4 YEARS

£180K+ DONATED

TO OUR COMMUNITY TRUST FUND AND GREENER FUTURE FUND BENEFITING

19,000+ PEOPLE

10 LOCAL SCHOOLS

(LU1-LU4) REACHED THROUGH CLASSROOM TO CAREER INITIATIVE IN ITS FIRST YEAR

5. All terminal waste (including LLAOL operations, concessions passenger waste but excludes waste managed by third parties)

6. Our airport emissions are scope 1 and 2 carbon emissions which account for 0.4% of our overall carbon emissions.

7. Low carbon includes the use of Electric Vehicles and HVO as fuel for vehicles and stationary sources (e.g. back-up generators)

Introducing our Responsible Business Strategy: David Vazquez

In July 2024, we unveiled our new Responsible Business Strategy (RBS, which charts our ambitions to make a step change in environmental and social management at the airport and, working with our partners, support improvements in the aviation industry. Building on strong foundations, this comprehensive strategy sets out an ambitious framework of targets and commitments that aim to drive impact over the next three crucial years.

Our strategy is rooted in the belief that airports can drive positive change. By aligning closely with Luton Council's 2040 vision and Net Zero by 2040 ambition, we are dedicated to creating an inclusive and diverse work environment that reflects the makeup of our local community. The new RBS is structured around four key themes: Our Teams, Our Community, Our Infrastructure and Our Partners, each representing an important aspect of our areas of negative impact and positive influence.

CLIMATE CHANGE

As a major infrastructure asset in the UK we recognise the role we play in operating and contributing to a resilient transport system. With this we recognise the increasing risk climate change poses to the airport operation and interdependencies of communications, surface access and utilities such as electricity and water.

We are working with the Department for Environment, Food and Rural Affairs (DEFRA) the Department for Transport (DfT), our partners and the wider industry to ensure we develop a robust and resilient plan to mitigate and adapt to the impacts of a changing climate. We also recognise the responsibility we have to seek to decarbonise our operations and encourage our airport partners to reduce their emissions, as part of the aviation industry's contribution to tackling climate change.

At the heart of our strategy are 30 carefully developed goals, created through extensive discussions with employees, regulators, passengers, community stakeholders and shareholders. These goals include significant initiatives such as:

- Generating 25% of the airport's electricity through on-site or near-site renewable energy sources by 2026
- Working with our airlines with an aim to drive up the proportion of Sustainable Aviation Fuel (SAF) usage
- Transitioning our entire vehicle fleet to low-carbon emissions by 2030
- Launching the Classroom to Careers roadmap to provide local young people with structured pathways into aviation careers

Our work is guided by core principles of collaboration, transparency and innovation. We are not just committed to making our operations more sustainable; we aim to make sustainability principles a core part of our organisational culture, ensuring that we grow responsibly.

We couldn't achieve the ambitions in our RBS without the support and dedication of teams across the business; in 2024 LLA welcomed a new Environmental Compliance Manager and a Sustainable Travel Plan Coordinator. Together with our airport partners, we are showing the important role we can play in creating a more sustainable future for aviation.

David Vazquez
Head of Sustainability

The RBS at a glance

Our vision for the future

Our corporate vision

To be the simplest and friendliest major airport, focused on sustainable growth

Our sustainability ambition

Champions for Sustainable Aviation

Delivered by our

Responsible Business Strategy

Definition: Sustainable growth

Our strategy is built on the principle of sustainable growth. This means growing the number of passengers travelling through London Luton Airport through a business model which generates strong, positive social impact and limits environmental impacts to within planetary boundaries. This does not mean zero impact.

To deliver this, our Responsible Business Strategy lays the foundation for better business that supports our communities, makes the airport a great place to work, delivers Net Zero operations at the airport, and works with our partners to work towards a sustainable future for air travel.

Definition: Sustainable Aviation

Adoption of business practices and technologies across all organisations working in the aviation sector that create positive social outcomes and operate aircraft, ground vehicles, and infrastructure that limits environmental impacts to within planetary boundaries, especially climate change and noise. This does not mean zero impact.

Our strategic themes

Our airport

Our responsibility

The future of people

1. Our Teams

Making LLA a great place to work, learn, and build a fulfilling career.

Read more on page 64

2. Our Community

Supporting our neighbours and community in impactful ways.

Read more on page 50

The future of flight

3. Our Infrastructure

Providing the infrastructure, and supporting the transitions necessary for LLA to move to Net Zero.

Read more on page 16

4. Our Partners

Collaborating with our partners to design the future of our sector and supporting the innovation and implementation of future flight technology.

Read more on page 34

Robust governance mechanisms hold the organisation and teams across LLA accountable for the delivery of the RBS.

ENVIRONMENTAL · NET ZERO BY 2040

Our Infrastructure

London Luton Airport (LLA) is committed to managing our environmental and social impact in our daily operations. Leading by example, we focus on high-impact areas to inspire partners and passengers towards Net Zero, starting with our own infrastructure and journeys.

This section covers both our physical infrastructure and the operational systems under our direct control, including our scope 1 and 2 emissions, waste management and water use. We'll spotlight our proudest achievements and be transparent about where we need to do better.

Our ambition is clear: to achieve Net Zero airport operations by 2040 or earlier. As a key player in the Luton community, our work directly supports Luton Council's 2040 vision to be a a healthy, fair and sustainable town.

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Net Zero: Airport emissions

PAGE 23
Energy

PAGE 28
Waste

PAGE 32
Water

PAGE 33
Light pollution

Highlights from 2024

88% OF OUR VEHICLES TRANSITIONED TO LOW-CARBON[8] **ALTERNATIVES**

53% OF ENERGY EFFICIENCY UPGRADE PLAN **NOW COMPLETED**

82% AVERAGE RECYCLING RATE[9]

NEAR COMPLETION OF INTERNAL BUILDING LED UPGRADES (IDENTIFIED THROUGH SITE-WIDE ENERGY AUDIT)

28% REDUCTION IN SCOPE 1 & 2 CARBON EMISSIONS (AGAINST 2019 BASELINE)

"In 2024, we took major steps forward on our Net Zero journey - transitioning to low-carbon[8] vehicles, enhancing energy efficiency, and reducing our reliance on gas. These efforts have led to a meaningful drop in airport emissions, an important step in our Net Zero roadmap. We're also proud to be one of the first major UK airports to introduce next generation security technology, improving screening while ensuring a smoother, more welcoming experience for everyone travelling through London Luton Airport. Additionally, our pioneering trial of electric Ground Support Equipment is exploring innovative ways to reduce the environmental impacts of aircraft servicing."

— **Neil Thompson, Chief Operations Officer**

8. Low-carbon includes the use of Electric Vehicles and HVO as fuel for vehicles.

9. All terminal waste (including LLAOL operations, concessions passenger waste but excludes waste managed by third parties)

RBS commitments

Commitment	Status	Progress
100% LED in LLA-operated buildings by 2027 and work towards achieving 100% for taxiways by 2030.	Performing	More than 90% of LLA-operated buildings have LED installed – putting us on track to complete the target two years ahead of schedule. Taxiway and runway LED lighting upgrades on track for end of 2030.
Work towards our aim to achieve 100% low-carbon in our own vehicles by 2030.	Performing	Significantly ahead of target. 88% of LLA fleet was low-carbon at the end of 2024.[10]
Promote and collaborate with on-site concessionaires with the aim of achieving a 75% recycling rate by 2026.	Performing	We achieved this in 2024, reaching 82% - above the industry average – and we will maintain this in the years ahead.
Supply 25% of direct electricity at the airport through on or near-site renewable energy sources by 2026.	Performing	We worked with our network partner to make good progress towards on-site renewables - see page 24.
Maintain our Energy Management System ISO 50001 and 14001 Environmental Management System Certification.	Performing	We maintained this by achieving recertification in 2024.
Identify and quantify our own operations that currently use potable water that could be served by non-potable water.	Performing	Our water use is increasing. We have commenced a feasibility review to explore opportunities to reduce water consumption across terminal and airfield operations. See page 32.
Develop an Electric Vehicle (EV) and future mobility transition roadmap by the end of 2025.	Performing	Our EV roadmap has been developed.

Performing
Performing as expected or exceeding targets set.

Monitoring
Behind target and requires attention. Regular monitoring and potential action required.

At risk
Off track and at risk of non-compliance. Immediate corrective action needed.

10. Vehicles operated directly by LLAOL

Net Zero: Airport emissions

INTRODUCTION

We have set an ambition to achieve Net Zero by 2040 for our airport emissions.

Emissions that come directly from the airport's buildings and vehicles (scope 1 and 2) account for only 0.4% of our total carbon footprint. The majority of our emissions are indirect, with aircraft emissions and passengers traveling to and from the airport making up the most.

The airport's total reported carbon emissions (scope 1, 2 and 3) increased 1% from 1,206,244 tCO_2e in 2023 to 1,221,915 tCO_2e in 2024, but are 4% lower than 2019 (1,268,898 tCO_2e).

In this section of the report, we showcase some of the measures we have taken that seek to reduce the carbon emissions from our operations. We outline our actions to reduce our scope 3 partner emissions in more depth from page 37.

Our work to achieve Net Zero by 2040 follows the carbon management hierarchy, where we prioritise avoiding emissions, followed by reducing emissions wherever possible, and then plan to address any residual emissions using carbon credits.

In line with this, we are working to reduce our airport emissions by at least 90% across our vehicle fleet, heating, energy use, ground de-icing, fire training and electricity use. If necessary, any residual emissions are likely to be addressed by purchasing appropriate carbon credits.

Our Net Zero roadmap sets out our path to this goal, with a programme of interventions that aims to progressively avoid and reduce carbon from airport operations. The roadmap is underpinned by an investment model that enables us to plan capital allocation.

OUR CARBON MANAGEMENT APPROACH

We report our carbon emissions in accordance with the Greenhouse Gas (GHG) Protocol (Corporate Standard), the world's most widely-used greenhouse gas accounting standards.

We follow industry good practice in our methodology and seek external validation via the ACA carbon management certification standard. We have expanded our footprint measurement in line with the requirements of Level 4 (Transformation) of the ACA scheme - which we achieved in 2023. We will be conducting a full renewal of our ACA membership in 2026.

As a result of updated methodologies and data availability, we have recalculated the emissions from 2019 and 2023 to best reflect these updates and accuracy of carbon outputs from our airport. One of the more significant recalculations is the improved methodology and data used to calculate the emissions from Landing Take Off (LTO) cycle and Cruise, Climb and Descend (CCD) emissions under scope 3. This new approach ensures that true taxi-in and taxi-out times at LLA are used in the calculation, whilst introducing the full aviation emissions generated in the CCD, in line with ACA Level 4 requirements.

We obtained limited assurance of our 2024 scope 1 and 2 emissions against the ISO 14064-1 standard. You can find the verification opinion in the Carbon and GHG Management Report on our website.

Our carbon management approach incorporates key aspects of emerging guidance, policy and legislation, in particular the Government's Jet Zero strategy.

Finally, we compare our carbon emissions and set our Net Zero targets against a 2019 baseline, because this is the most recent period in which LLA was operating at full operational capacity, with the highest passenger numbers seen at LLA.

OUR AIRPORT'S ANNUAL EMISSIONS TRENDS

In 2024, our scope 1 and 2 emissions were 5,764 tCO_2e (location-based). This is 28% lower than our 2019 baseline. This is a big step forward from 2023 emissions, which were 17% below our baseline. As a result, our airport emissions per passenger (scope 1 and 2) reduced to 0.34 kg CO_2/pax, a 23% reduction from our 2019 baseline and a 15% reduction from last year's 0.40 kg CO_2e/pax.

As you can see in Figure 1, we have been able to reduce our scope 1 emissions which include operational vehicles and car park buses, generators, heating, fire training, refrigerant losses and ground de-icing.

In 2024 we made further significant progress on reducing our scope 1 emissions. We have now implemented over half of the energy efficiency measures identified in our site-wide audit, trialled Hydrotreated Vegetable Oil (HVO) in our generators as an alternative to diesel, and 88% of our operational vehicles have now been replaced with low-carbon alternatives.

In comparison, our scope 2 emissions come from the energy we purchase. We report our scope emissions using 2 methods: location-based (which uses the national average carbon intensity of the UK grid) and market-based (which reflects the specific contracts we have in place).

Location-based

Currently, the decarbonisation of the National Grid is significantly lagging behind Government targets. With less green energy being introduced to the National Grid than forecasted, these emissions remain high as we electrify the airport's operations. The impact of this lag has been reduced by the energy efficiencies delivered across the airport, particularly our LED programmes and building controls on our Heating, Ventilation and Air Conditioning (HVAC) systems.

To reduce the airport's energy consumption from the National Grid and local sources, we are seeking to continue with our plans to generate on-site renewable energy and to achieve at least 25% of airport electricity demand from these sources by the end of 2026. As a result of this intervention, our scope 2 emissions should start to fall significantly.

Market-based

Since April 2021, we have purchased all Airport electricity from Renewable Energy Guarantees of Origin (REGO) certified suppliers, ensuring we are fully renewably powered and zero carbon in our scope 2 emissions under a market-based approach.

FIGURE 1: Our airport emissions (scope 1 and 2)

Legend:
- Mobile sources - vehicles
- Stationary sources - natural gas heating & boilers
- Process emissions - refrigerants
- Stationary sources - generators & heating
- Stationary sources - fire training
- Process emissions - ground de-icing
- Purchased electricity (location-based)
- Carbon emissions per passenger
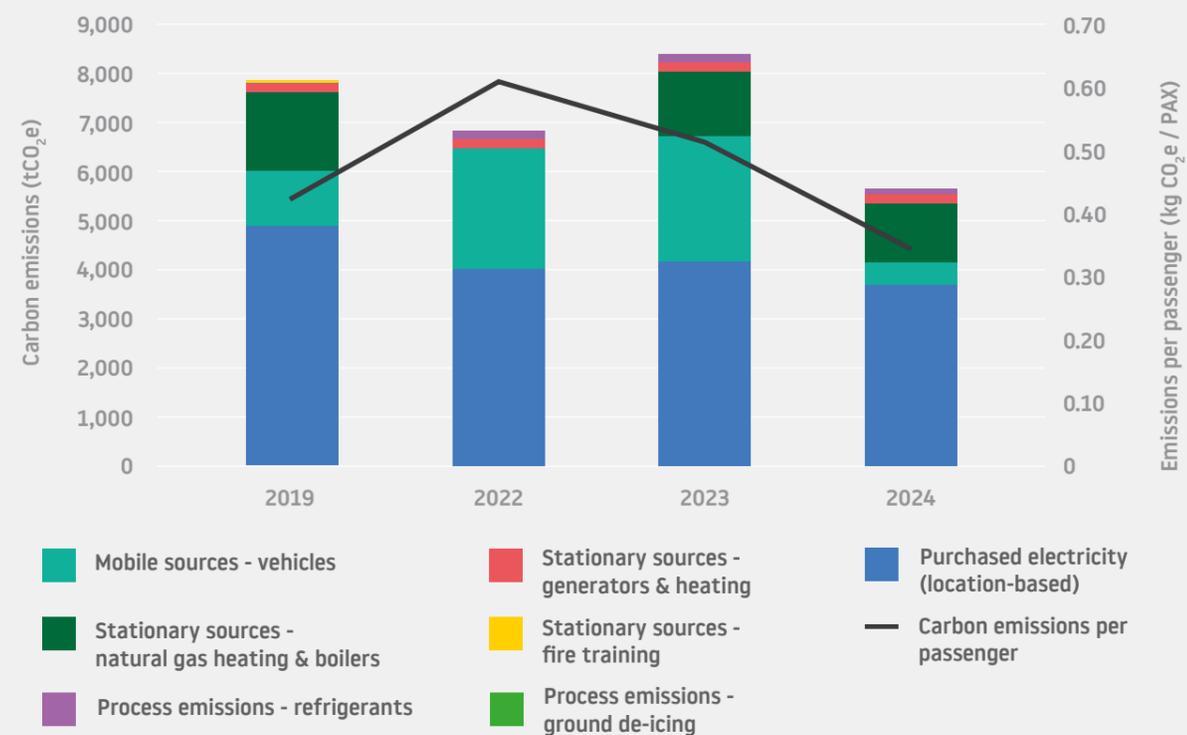
FIGURE 2: Net Zero roadmap

7,946 tCO_2e
5,764 tCO_2e
300 tCO_2e

Legend:
- Residual emissions
- Generators
- Renewables
- Vehicles
- Heating
- Buses
- Energy efficiency
- Business as usual
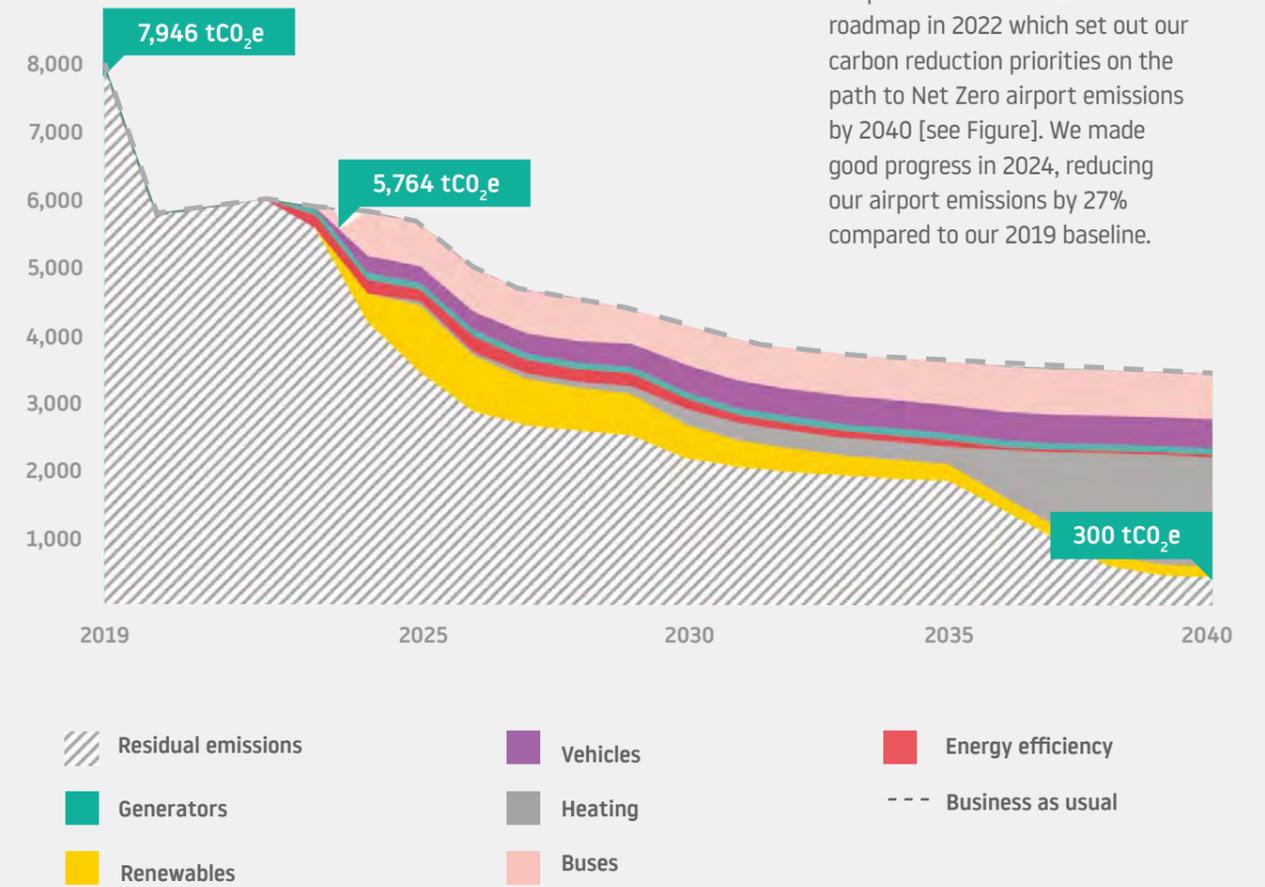
### PROGRESS

We published our Net Zero roadmap in 2022 which set out our carbon reduction priorities on the path to Net Zero airport emissions by 2040 [see Figure]. We made good progress in 2024, reducing our airport emissions by 27% compared to our 2019 baseline.

Energy

LOW-CARBON VEHICLES AND FUELS

Emissions from operational vehicles account for around 15% of our scope 1 and 2 footprint. To reduce our emissions we must change the way we operate our vehicle fleet.

In 2024, we announced the implementation of a new Low-Carbon (LCV) Policy and Fleet Transition Strategy. We have committed to achieving 100% low-carbon vehicles in our own fleet by 2030 and a 100% zero emission fleet by 2035. Low-carbon means Electric Vehicles (EV) or vehicles powered by hydrotreated vegetable oil (HVO), which provides lifecycle carbon emission savings of up to 90% compared to diesel.[11]

We've made significant progress towards these targets. 88% of our operational fleet has now switched to low-carbon alternatives - up from 25% at the end of 2023. Last year, we were proud to transition all our car park transfer buses to HVO fuel; a change that directly reduces passenger journey emissions. In 2024, this reduced emissions by 377.84 tCO$_2$e.

This was a collaborative initiative across sustainability, commercial, motor transport, airport operations, fire service, security and procurement teams.

88% of our operational fleet has now switched to low-carbon alternatives - up from 25% at the end of 2023

EV AND FUTURE MOBILITY ROADMAP

We have met our RBS commitment to develop an EV and future mobility transition roadmap by the end of 2025.

ENERGY MANAGEMENT APPROACH

Electricity is our largest energy source, followed by natural gas and fuel. In 2024, we used 29,757 MWh of energy, of which 18,564 MWh was from electricity usage (62.3%). We manage our energy use through our integrated energy and environmental management system, and in 2024 we achieved recertification to the ISO 50001 and ISO 14001 standards, both of which we have held for a decade.

To reduce our total energy use of grid electricity and non-renewable sources, reduce our emissions and improve resilience across the operation, LLA is enhancing energy efficiency, shifting to on-site renewables and adopting low-carbon[12] fuels in our vehicles and stationery energy sources. This work includes actively retrofitting existing infrastructure and developing new projects, including pursuing the implementation of a 10MW solar farm.

As an airport, we face unique energy efficiency opportunities and challenges. We have many safety-critical systems, including runway lighting and emergency vehicles, which require greater planning and implementation time to transition to lower carbon alternatives. The requirement for the airport to remain operational 24 hours a day creates a number of unique challenges, such as transitioning to electric operational vehicles that require time 'offline' to recharge or upgrading key assets such as generators or lighting. In light of this, we are working with industry experts and operational teams across the airport to identify innovative solutions to decarbonisation, whilst preserving our operational and safety requirements.

We have purchased 100% of our electricity from renewable sources since 2021 and, as mentioned, are looking to generate on-site electricity from renewable sources.

Our work to implement more effective electricity metering across the airport site will ensure we identify further opportunities for efficiencies and consumption reduction.
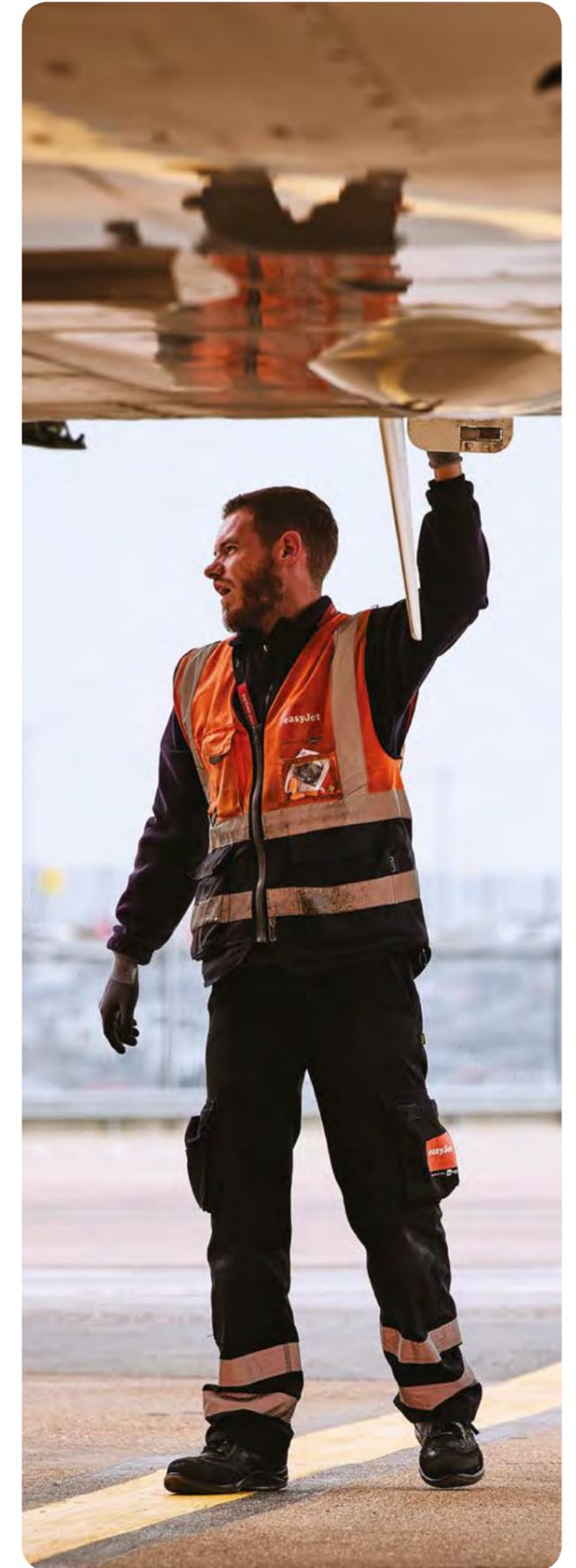
ELECTRICITY EMISSIONS DATA

Location-based emissions

Based on the emission intensity of the UK National Grid.

FIGURE 3: ELECTRICITY - LOCATION-BASED

Carbon emissions

■ Scope 2: Emissions from LLAOL electricity use

■ Scope 3: Emissions from third-party electricity use
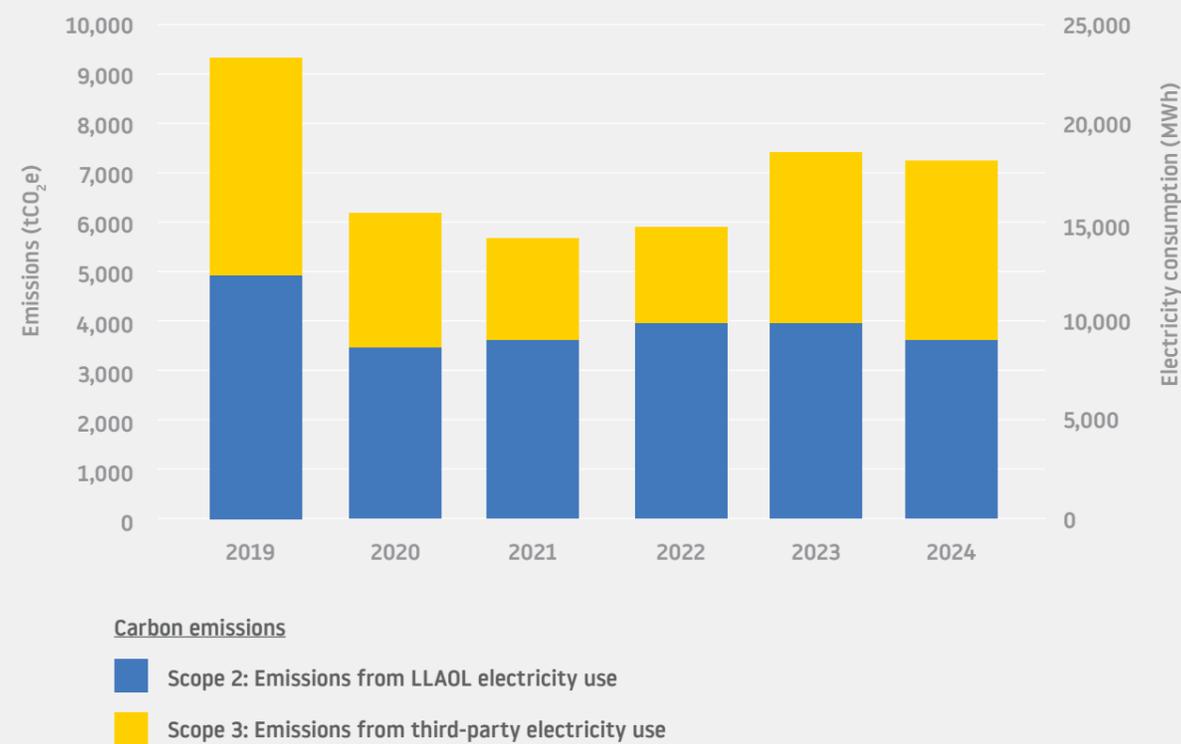
Market-based emissions

Based on the electricity purchased by LLA, using contract-based emissions factors.

FIGURE 4: ELECTRICITY - MARKET-BASED

Carbon emissions

■ Scope 2: Emissions from LLAOL electricity use

■ Scope 3: Emissions from third-party electricity use
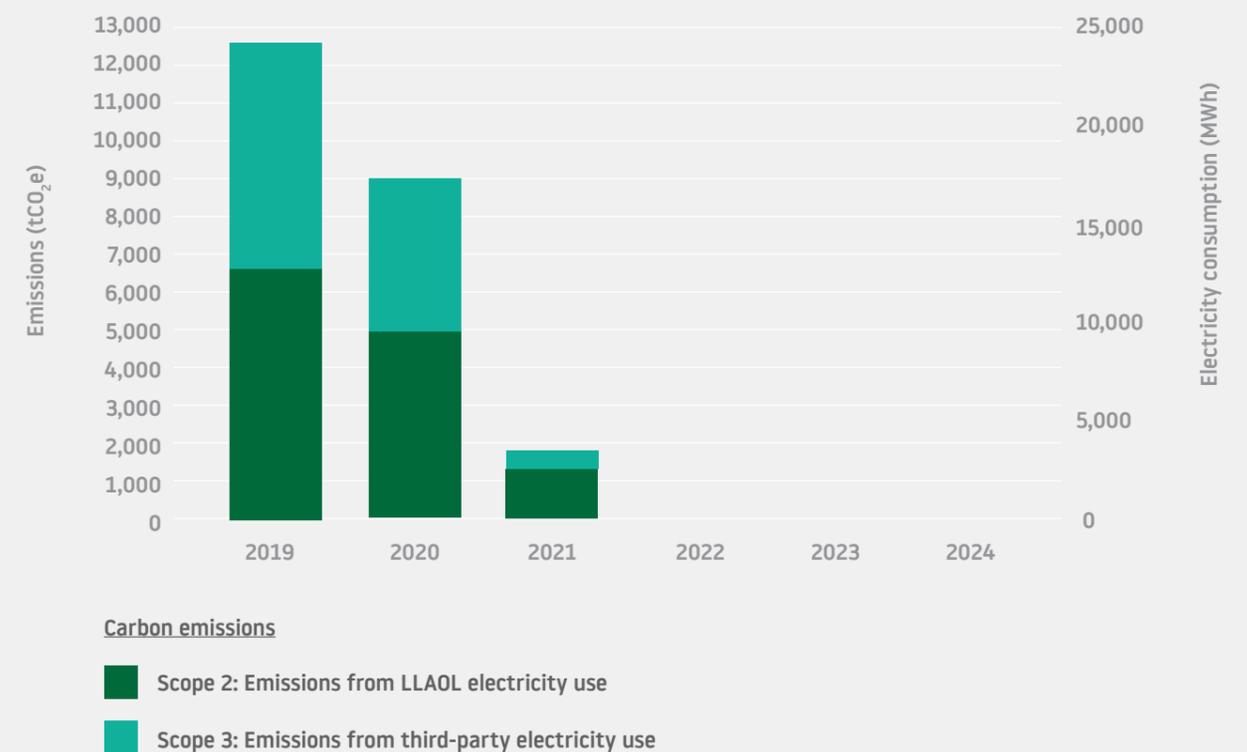
FIGURE 5: ELECTRICITY USE AND EMISSIONS FROM ELECTRICITY

		2019	2020	2021	2022	2023	2024
Carbon emissions (location-based)	Scope 2	4,981	3,418	3,538	4,045	4,091	3,844
	Scope 3	4,324	2,706	2,211	1,918	3,404	3,621
Carbon emissions (market-based)	Scope 2	6,772	5,059	1,332	0	0	0
	Scope 3	5,880	4,034	779	0	0	0
Electricity consumption (MWh)	LLAOL	19,488	14,660	16,665	20,920	19,756	18,564
	Third-party	16,920	11,609	10,415	9,918	12,384	13,158
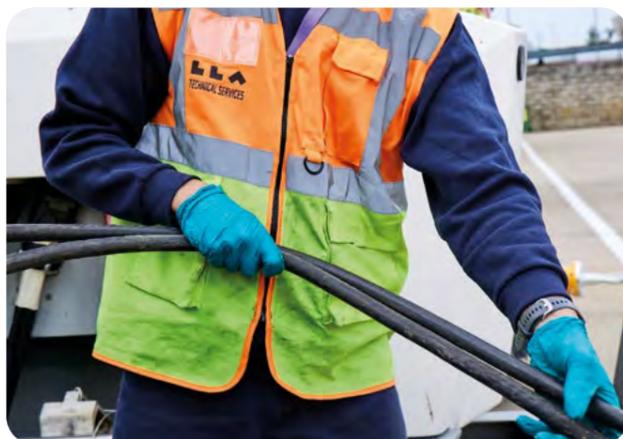
POWER FEASIBILITY STUDY

In 2024, we conducted a power feasibility study to understand the airport's evolving energy needs and how to best plan for future growth in a responsible way. This innovative approach treats electricity as a finite resource rather than an unlimited commodity, examining the capacity of the airport's electrical infrastructure to better match demand with available capacity. The findings will inform our plans for better energy and carbon management.

ENERGY PERFORMANCE

We used 29,757 MWh of energy in 2024, down from 31,325 MWh of energy in 2023. We saw our energy use per passenger reach a new low of 1.78 kWh/pax, (2019: 1.84 kWh/pax). This means we have achieved a new benchmark for energy use per passenger, whilst passenger numbers remain 7% lower in 2024 than in 2019. To reduce this further we are also looking to shift from using natural gas and fossil fuels to electrical alternatives.

FIGURE 6: Scope 1 and 2 energy performance, including per passenger
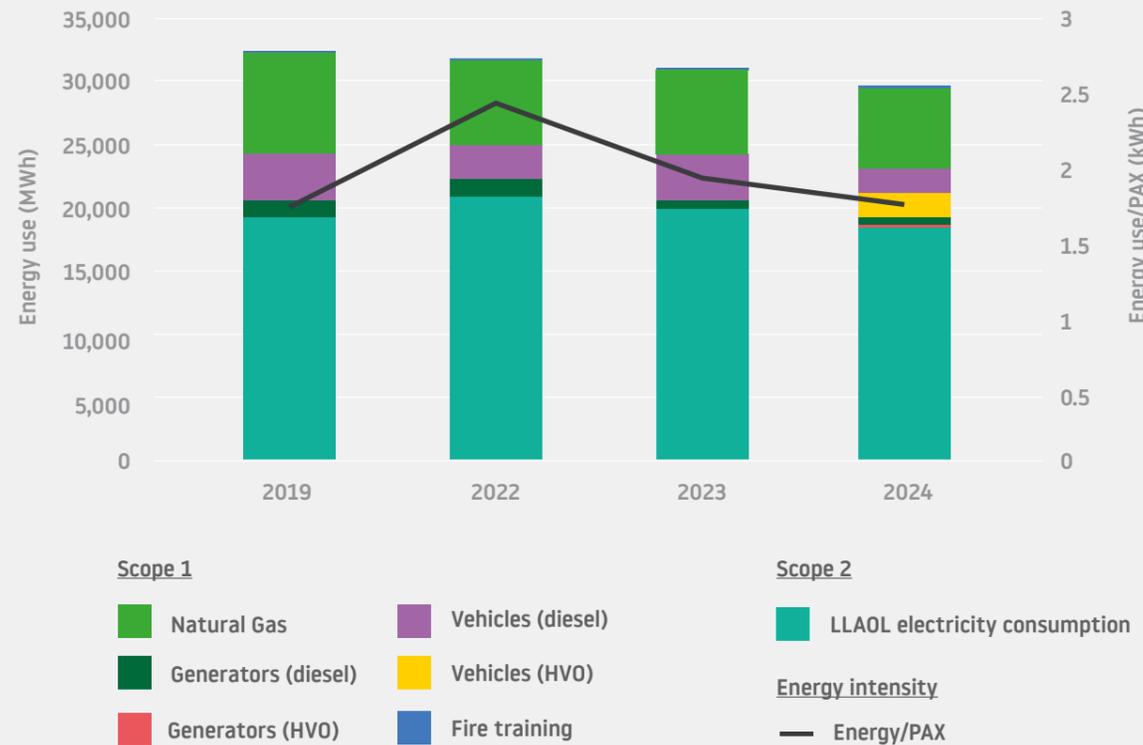
ENERGY EFFICIENCY

Following a site-wide energy audit in 2022, we created a five-year upgrade plan which, once fully implemented, will deliver a 15% reduction in energy use. We have now completed 53% of this plan.

In 2024, progress on energy efficiency projects included:

• Progressing with LED lighting upgrades in the terminal building and terminal car park.

• A new boiler management system that ensures we only run the necessary number of boilers, contributing to significant scope 1 emissions reductions.

• When we renewed our Building Management System (BMS) service contracts, we included a requirement for monthly visits to optimise energy strategies and identify potential savings.

ON-SITE RENEWABLES

Generating renewable energy on site would make a significant contribution to achieving Net Zero by 2040. We have committed to supplying 25% of our direct electricity consumption from on- or near-site renewable energy sources by 2026.

Despite some challenges, our on-site solar plans progressed through 2024, keeping us on track for generation by the end of 2026. After six months of negotiation with our network partner, we reached an agreement in principle to proceed with the design development of our planned solar farm.

The new 10MW solar farm would supply a significant portion of the airport's energy needs. Our target is to generate more than 25% of the airport's electricity requirement via the solar farm by 2026. We are also exploring the use of batteries to store excess energy, and whether we can integrate this system with electric Ground Support Equipment (eGSE) charging.

We are seeking to take an innovative financing approach for our solar project, working with Zestec Octopus Group. This complements our broader energy transition plans to engage our shareholders, Luton Rising, and other partners in delivering on-site and off-site renewable energy solutions.

Ultimately, we want to establish LLA as a renewable energy hub, supporting research, design and adoption of innovative technologies that will help us - and our wider community - achieve our Net Zero goals.

Case study

DRIVING DOWN EMISSIONS WITH LOW-CARBON VEHICLES AND ENERGY EFFICIENCIES

Progress towards Net Zero at LLA is picking up speed. In 2024, we accelerated the transition to a cleaner, greener fleet, with more than two-thirds of airport vehicles now running on low-carbon alternatives, including electric and HVO-powered models.

This shift didn't happen overnight. It was the result of careful planning and strong cross-team collaboration across the sustainability, airport operations, fire service and procurement teams. **Notably, all car park transfer buses now run on HVO - a fuel that slashes lifecycle carbon emissions by up to 90% while reducing noise and improving air quality for passengers and staff.**

This momentum was matched on the energy front. We've completed more than half of our five-year energy efficiency upgrade plan, unlocking operational savings while cutting carbon. LED lighting retrofits, new boiler management systems and smarter energy monitoring have contributed to a 28% reduction in scope 1 and 2 emissions since 2019. Combined with plans for a 10MW solar farm, these measures put us on track to deliver our ambitious Net Zero roadmap.

FOCUS FOR 2025

Looking ahead, a key focus area for improvement is our energy metering systems. We are working to develop more granular level monitoring capabilities to better understand and manage our energy usage across the airport. In 2024 we began trialling the use of HVO in our generators. If the trial is successful, we will aim to roll this out fully in 2025.

Waste

APPROACH

We aim to reduce the total waste generated across the airport operation whilst improving recycling rates and material re-use.

Together with our local waste partner Cawleys, we manage waste through clearly segregated streams across the airport. Since 2016, we've been working closely with our teams and on-site partners to improve waste segregation practices, particularly single-use plastics.

We established an on-site waste pre-treatment process with Cawleys in 2021, and their expertise and sorting facility has been instrumental in significantly improving our recycling rates. This, combined with proactive engagement with airport concessions and incentives for reducing general waste, has delivered remarkable results.

PERFORMANCE

In 2024, we produced 2,209 tonnes of waste, up slightly from 2,138 tonnes in 2023 - a 3% increase, year on year. However, our waste per passenger rate in 2024 remained the same as in 2023, at 0.132 kg per passenger, down from 0.14 kg in 2019. Our target is 0.12 kg per passenger.

No airport waste from our Cawleys operation went to landfill - it was either recycled, composted (food waste and coffee), or sent to an energy-from-waste plant.

In 2024, we created 1,811 tonnes of recycled waste and 398 tonnes of non-recycled waste, and achieved an average recycling rate of 82%. This means we achieved our RBS commitment to reach a 75% recycling rate by 2026 - two years ahead of schedule. We have maintained high rates of recycling despite a considerable increase in passenger numbers, demonstrating the effectiveness of our processes.

In 2024, we also worked to improve passenger waste reduction and recycling behaviours. We installed hundreds of new waste disposal points throughout the terminal, passenger journey and forecourts. We also improved the design and layout of recycling points to increase usage.

Our approach to waste has attracted interest from other airports across the UK who are keen to learn from our success. We're proud that our collaboration with Cawleys earned us a Gold 'Green World Award' highlighting LLA's leadership in waste management.

UPDATE ON EMISSIONS AND WASTE FROM 2023 CAR PARK FIRE

The TCP2 fire in 2023 is classified as a non-business-as-usual (BAU) emergency incident in respect of carbon reporting and therefore falls out of scope for reporting. However, under construction activities, we have reported the emissions originating from the demolition waste and fuel used in the deconstruction of the car park structure itself. This is a reportable scope 3 measure covering the emissions from the LLA infrastructure asset demolition waste only.

FIGURE 7: Waste performance
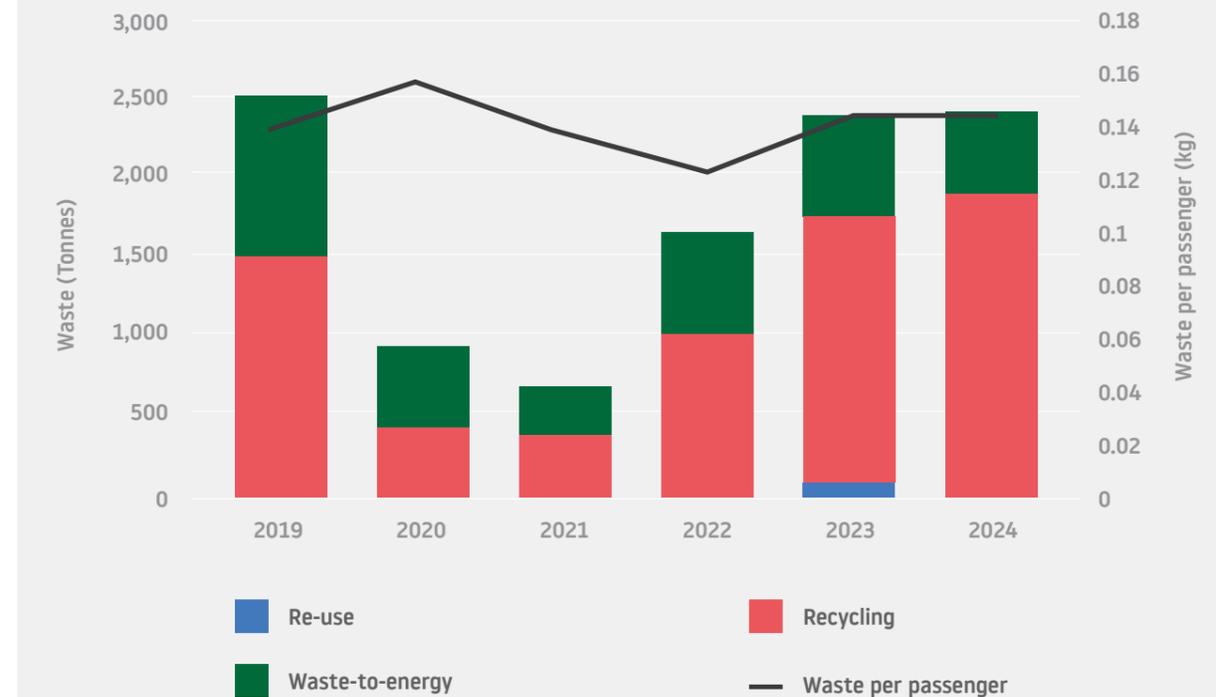
FIGURE 8: Recycling rate
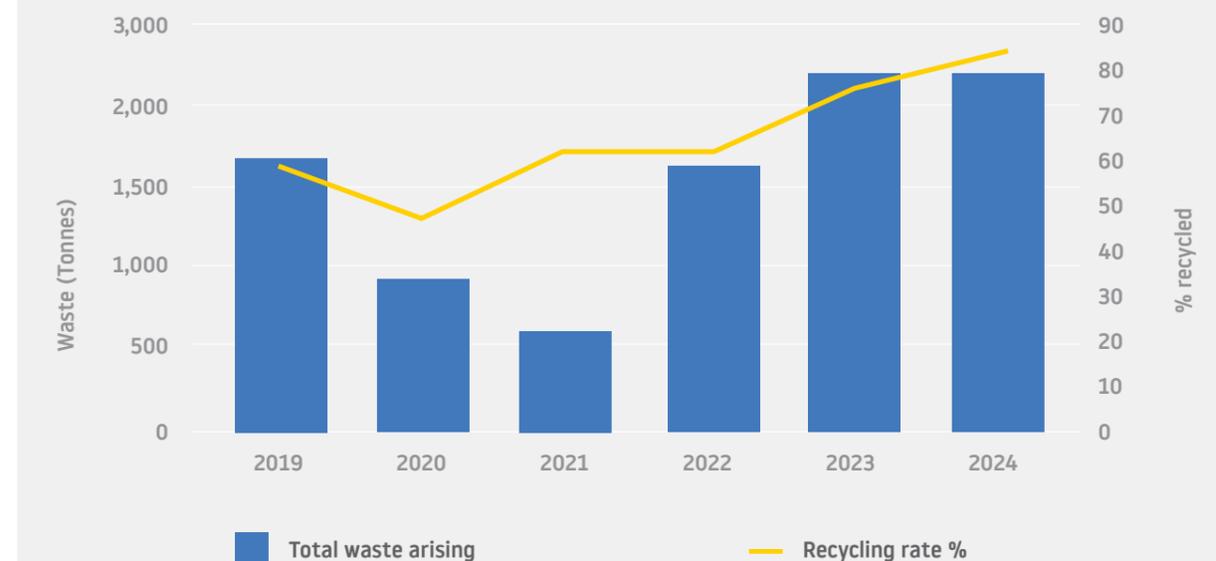
Case study

AWARD-WINNING COMMITMENT TO REDUCING WASTE

Together with Cawleys, we have successfully increased recycling rates from 49% to 82% since 2020, earning three award nominations last year - with a win at the Green World Environment Awards and 'Highly Commended' at the GO Awards for Contract and Supplier Management.

Judges praised our joint commitment to continuous improvement, a shared vision and determination to make a difference.

Central to this success has been the close collaboration between LLA and Cawleys, whose permanent on-site sorting facility and proactive engagement with concessions helped drive significant behavioural change.

Our achievements haven't gone unnoticed - other airports have visited to learn about our innovative approach to waste management.

ENGAGING WITH CONCESSIONS

In 2024, we continued to improve our recycling rate by working closely with Cawleys and our concessionaires to pinpoint opportunities for improving waste management.

Our incentive scheme, which ran throughout 2024, helped increase awareness and accountability on waste and recycling. Every quarter, concessions with the highest recycling rates are celebrated on a leaderboard and awarded gift vouchers to give to employees, which has proved incredibly successful.

SINGLE-USE PLASTICS

We work with all our on-site partners to reduce some types of single-use plastics, and all new retail concession agreements contain clauses to prohibit the use of certain types of single-use plastic. Our total plastic waste in 2024 was 15 tonnes, down from 20 tonnes in 2023.

With the implementation of the new next generation security system, passengers can now carry liquids through security, which helps reduce the need for single-use plastic bottles.
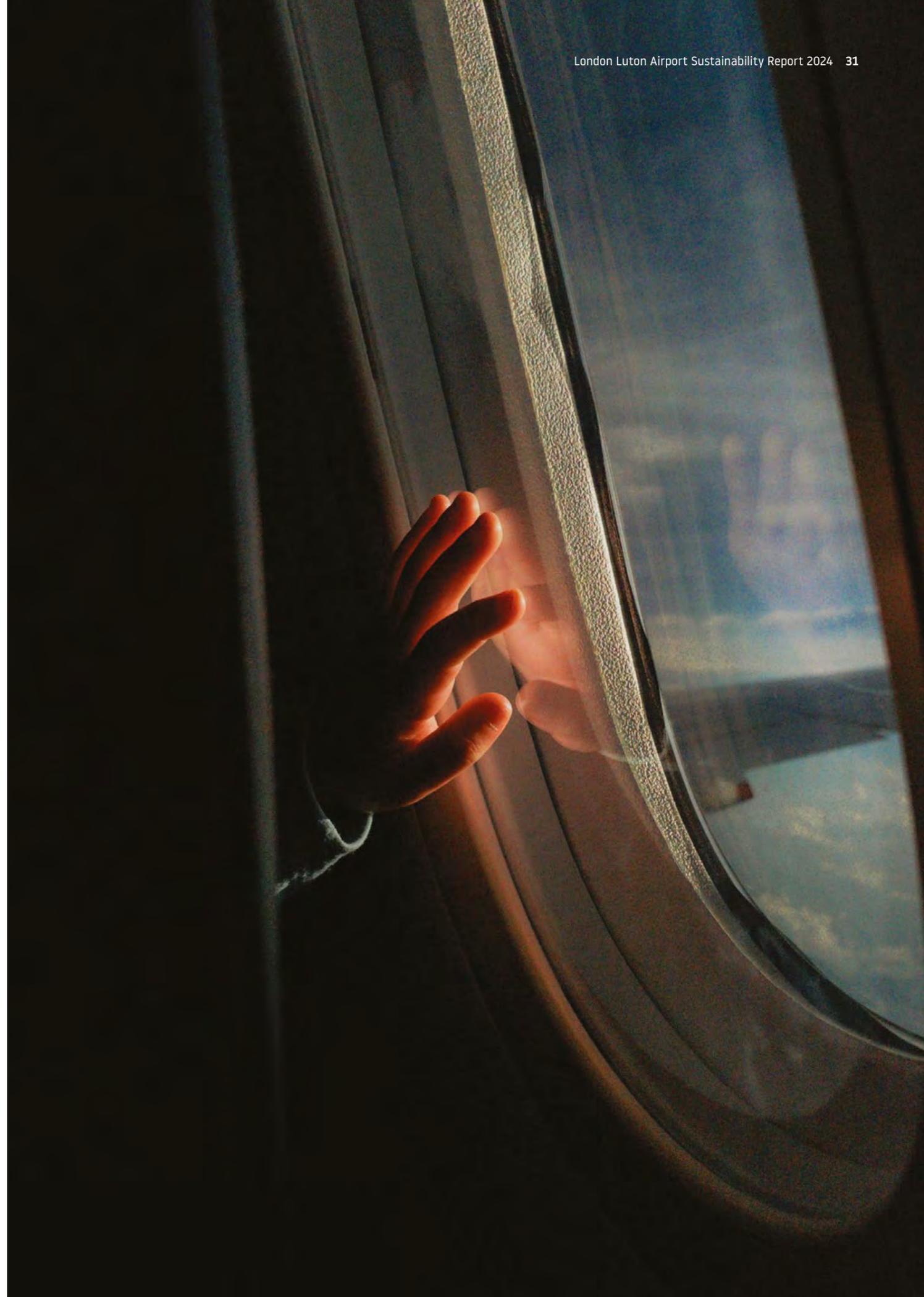
Water

APPROACH

We aim to use water responsibly across the airport, with a goal to reduce our water use per passenger and to explore opportunities to increase our use of non-potable water. Most water at LLA is consumed in terminal facilities, with additional use in operational buildings, such as the fire station, as well as landscaping and construction.

We work with a third-party contractor and use data from an expanding network of water meters to identify leaks and reduce consumption. We have installed 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 QUALITY

The airport operates robust controls for de-icing aircraft as this can impact water quality. For more information, see Our Partners section on page 34.

PERFORMANCE

In 2024, LLA's water consumption increased to 8.2 litres per passenger, up from 7.4 litres in 2023, placing us behind our target. This increase was partly due to additional water required for demolition works associated with the TCP2 fire.

However, we recognise we need to improve water management as our passenger numbers grow. In 2024, we started working more closely with our partner Veolia to improve metering across our site. The more information we have about water consumption, the more effective we can be in our response.

As part of this work, we began conducting a feasibility study to find out where and how we can make water savings. In particular, we're assessing opportunities to substitute potable water with non-potable sources, particularly in high-use areas like the fire station.

AVOIDING WATER CONTAMINATION FROM THE CAR PARK FIRE

Following the TCP2 fire, LLA took extensive measures to protect the environment from potential contamination. For over five months, LLA continuously pumped and transferred runoff water to a secure contractor compound for containment - collecting over 8 million litres of water.

To manage this efficiently, LLA secured an environmental permit, enabling on-site water treatment and avoiding costly off-site disposal. We could then safely discharge the treated water back into the water table, without risking any environmental contamination.

Additionally, we installed several 70-meter-deep boreholes across the site to continuously monitor for contaminants.

SPILLS

LLA remains committed to reducing both the number and severity of spills occurring at the airport. This protects the local environment from potential contamination of substances like oil, fuel and chemicals.

We have robust procedures and thorough risk assessments in place to seek that reduce the likelihood and severity of spills, and our staff receive training to manage incidents effectively. Spill kits are strategically located throughout the airport and on air operations vehicles, ensuring rapid response.

In 2024, there were 45 spills, a reduction from 53 in 2023 and 57 in 2022. Only one spill was classed as major (amber rating), down from four the previous year. Most incidents involved equipment, closely followed by aircraft. All spills were successfully contained and cleaned. Additionally, we incentivise spill reduction by charging partners responsible for these incidents.

Light Pollution

APPROACH AND PERFORMANCE

Exterior lighting at LLA is carefully managed to seek to reduce negative impacts on our neighbours. We use lighting efficiently while reducing unnecessary use. Recent upgrades to energy-efficient LED lighting across the airport have further helped to reduce light pollution.

Our Partners

We are committed to collaborating with our partners to design the future of our sector and support the innovation and implementation of future of flight technology. From airlines and supply chains to concessions, tenants, operators and research institutions, our partners play a vital role in helping us run our airport operations both on the ground and in the air.

This section outlines our work with those partners - whether commercial, operational or academic - to reduce carbon emissions from airport activities, champion new aircraft technologies and promote more sustainable travel choices for passengers and employees. We'll share highlights from the past year and reflect on the challenges ahead.

Working with our partners, we aim to support initiatives that will reduce the environmental impact of aviation. In doing so, we support Luton Council's 2040 vision for a healthy, fair and sustainable town. By engaging partners with this shared agenda, we aim to maximise our collective impact and contribute to a greener, more resilient future.

PAGE 37 Scope 3 emissions

PAGE 42 Surface access

PAGE 45 De-icing

PAGE 46 Guests

PAGE 49 Partnership

Highlights from 2024

OUR ASQ SCORES REACHED 4.07 IN 2024 - **OUR HIGHEST SCORES EVER**

FORMALISED A STRATEGIC RESEARCH PARTNERSHIP WITH CRANFIELD UNIVERSITY ON THE FUTURE OF FLIGHT

WIZZ AIR UK TRANSITIONED ALL LLA BASED AIRCRAFT TO AIRBUS A321NEOS **A YEAR AHEAD OF SCHEDULE**

OUR **NEW AIRPORT SUSTAINABLE ACCESS STRATEGY** (ASAS) AND TRAVEL PLAN WERE DEVELOPED AND APPROVED BY LUTON COUNCIL

9.5% REDUCED LTO[14] EMISSIONS BY 9.5% FROM 2019, TO **9.47 KG CO$_2$E PER PASSENGER**

OVER **1400** EMPLOYEES FROM **52 BUSINESSES** COMPLETED OUR LICENSE TO SERVE TRAINING

COMMISSIONED **IN-DEPTH RESEARCH** TO UNDERSTAND BARRIERS TO SUSTAINABLE STAFF TRAVEL

THE DART CARRIED **2.9M PASSENGERS** FROM JAN-DEC 2024

60% OF AIRCRAFT BASED[13] AT LLA WERE NEXT GENERATION, REACHING OUR TARGET **THREE YEARS AHEAD OF SCHEDULE**

LEVEL 3 IN ACI'S AIRPORT CUSTOMER EXPERIENCE ACCREDITATION - **THE ONLY UK AIRPORT TO ACHIEVE THIS**

SUCCESSFUL INITIATION OF AN INNOVATIVE ELECTRIC GROUND SUPPORT EQUIPMENT TRIAL, WITH RESULTS AND A FEASIBILITY STUDY IN 2025

13. Based aircraft refers to an aircraft that operates from a specific airport as its primary base. It is typically stationed there and normally completes its overnight turnarounds at this airport.

14. LTO refers to the Landing Take-Off Cycle all aircraft conduct on departure and arrival at LLA, including ground taxiing and flight up to 1000ft.

RBS commitments

| Commitment	Status	Progress
Report the percentage of LLA-based aircraft that are next generation against a benchmark of 60% next generation by 2028.	Performing	In 2024, 60% of aircraft based at LLA were next generation, reaching our target three years early.
Work with airlines operating at the airport to drive up the proportion of Sustainable Aviation Fuel (SAF) used at the airport.	Performing	We continued engaging with airlines operating at LLA.
Work with airlines with the ambition to achieve a 5% reduction in aircraft carbon emissions per passenger by 2026.[15]	Performing	Significant progress made. LTO emissions[16] per passenger are down 9.5% since 2019 and down by 3.6% against 2023 alone – demonstrating the highly effective use of next generation aircraft.
Request the use of low-carbon fuels in the short term and work towards achieving 100% zero-carbon pooled equipment by 2035.	Performing	36% of the ground support equipment to service aircraft on a stand are electric or low-carbon. This includes existing electric fleet and the additional equipment introduced through the innovative electric Ground Support Equipment trial.
Develop an updated Airport Surface Access Strategy (ASAS) containing an emphasis on promoting sustainable modes of transport.	Performing	Our new Airport Surface Access Strategy was published in 2024.
Work towards a target of 35% sustainable transport mode share for employees and a target of 47% sustainable transport mode share for passengers by the end of 2028.	Monitoring	Although the target date is 2028 and we remain on track for employee Surface Access, passenger travel dropped to 29% in 2024 and is an area we remain focused to improving.
Develop partnerships and work with local universities and colleges to support academic projects related to future of flight technologies and infrastructure.	Performing	We formalised our partnership with Cranfield University.

	Performing		Monitoring		At risk
	Performing as expected or exceeding targets set.		Behind target and requires attention. Regular monitoring and potential action required.		Off track and at risk of non-compliance. Immediate corrective action needed.

15. From a 2023 baseline.

16. LTO (Landing, Take-Off Cycle) emissions cover the emissions from aircraft on the ground at Luton and up to 1,000ft in Luton Airspace

Scope 3 emissions

APPROACH

LLA is aligned with and a signatory member of **Sustainable Aviation**[17] and ACI Europe's Net Zero by 2050 goal. We are also aligned with the UK Government's Jet Zero goal to reach Net Zero for all aviation-related emissions by 2050.

In 2024, 87% of our scope 3 emissions came from aviation emissions (landing and take-off (LTO), auxiliary power unit (APU), cruise, climb and descent (CCD), and engine testing). Passenger surface access contributes 10% of our scope 3 emissions, and the remaining percentage was made up of multiple smaller scope 3 sources.

In 2024, we continued to report our carbon footprint in line with GHG Protocol and guidance from Level 4 of the ACA scheme.

As with our scope 1 and 2 emissions, we compare our scope 3 performance against a 2019 baseline - this is the most recent period in which LLA was operating at full operational capacity, with the highest passenger numbers seen at LLA.

KEY TO FIGURE 1 AND 2

- Category 1 - Purchased goods and services
- Category 11 - Total aircraft emissions
- Category 11 - Passenger surface access
- Category 11 - Landside cargo transport
- Category 11 - Tennant staff commuting

(0.1%) Category 3 - Fuel and energy related activites
(0.0%) Category 5 - Waste generated in operations
(0.0%) Category 6 - Business Travel
(0.1%) Category 7 - Employee commuting and home working
(0.3%) Category 11 - Third-party operational vehicles & GSE
(0.0%) Category 11 - Aircraft de-icing
(0.0%) Category 12 - End of life treatment of sold products
(0.3%) Category 13 - Downstream leased assets

FIGURE 1: SCOPE 3 EMISSIONS TRENDS
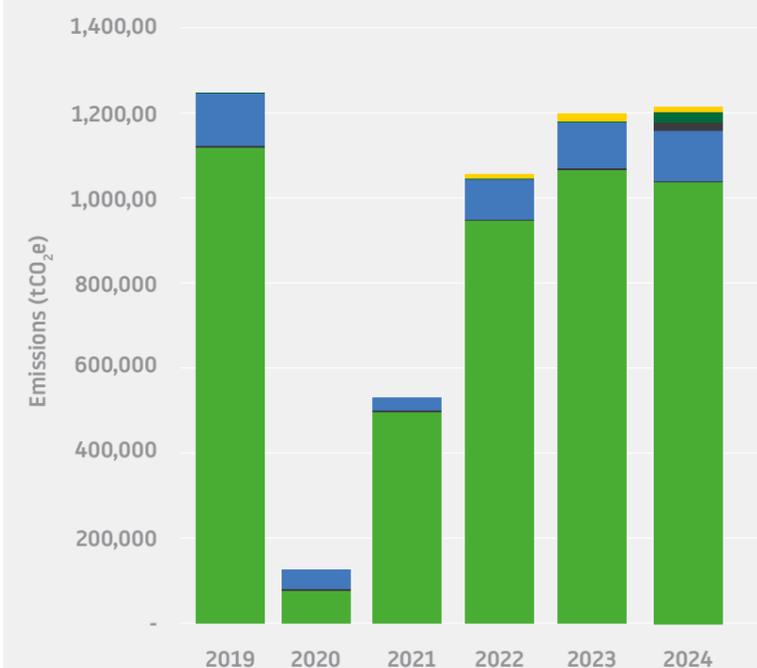
FIGURE 2: 2024 SCOPE 3 EMISSIONS BREAKDOWN

17. https://www.sustainableaviation.co.uk/

FIGURE 3: EMISSIONS PER PASSENGER TARGET

■ Emissions per passenger   — RBS reduction target
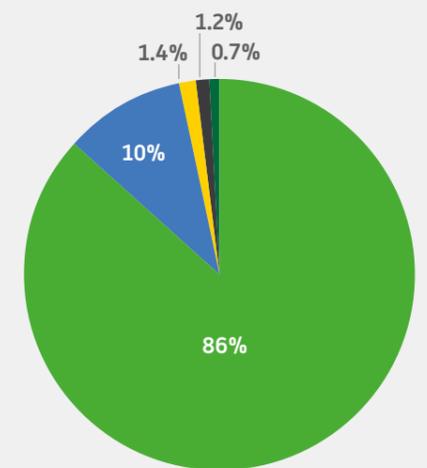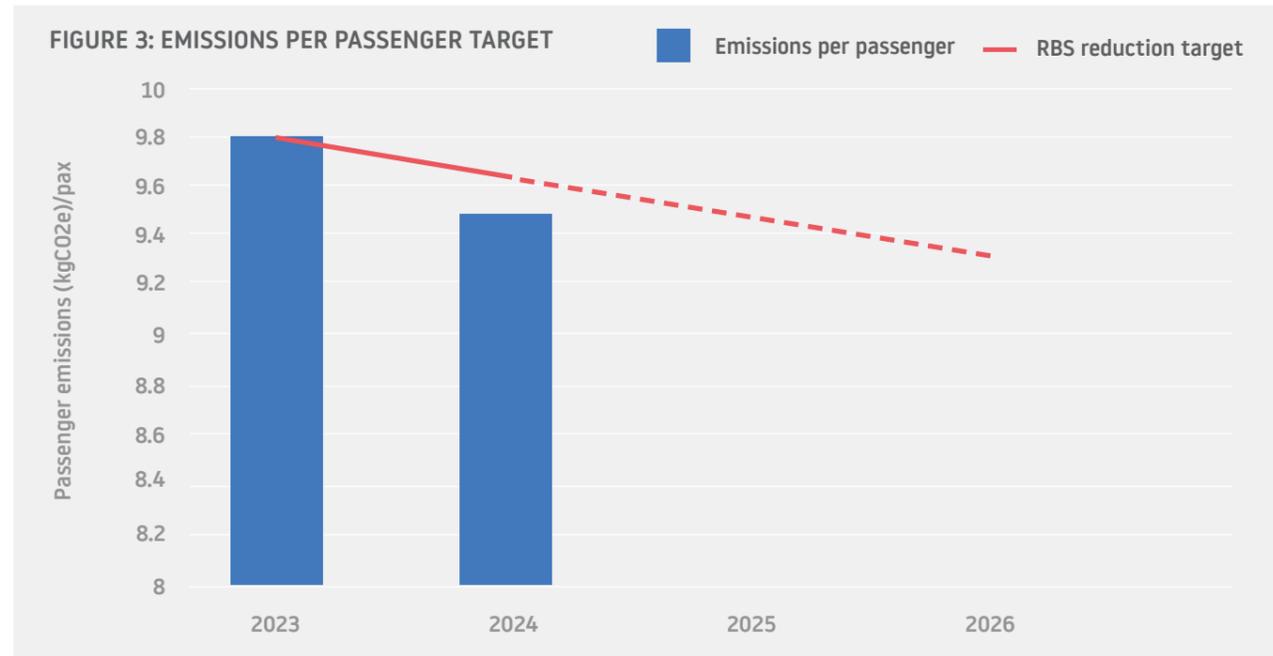
PERFORMANCE

In our Responsible Business Strategy, we have a commitment to reduce aircraft carbon emissions per passenger by at least 5% by 2026. We measure this as LTO emissions per passenger, which covers aircraft operations on the ground and in Luton airspace up to 1,000 feet.

We have made significant progress on reducing LTO emissions per passenger. Between 2019 and 2024, emissions per passenger fell by 9.5%, and are 3.6% lower than in 2023.

This ongoing reduction in LTO emissions per passenger has come through a combination of effective measures and engagement points. A large share was achieved by increasing the proportion of next-generation aircraft. Further measures include a reduction in APU run time, strict engine testing operating restrictions and ongoing engagement with airlines to improve efficiency, and reduce the environmental impact of flight operations to and from LLA, with respect to carbon emissions, air quality and noise.

A full breakdown of our carbon emissions can be found in the Supporting data on page 88.

AVIATION EMISSIONS

In 2024, we continued to work with our airline partners and the wider industry to decarbonise aviation through engagement, innovation and research, and operational procedures. We want all feasible carbon reduction opportunities to be explored.

NEXT GENERATION AIRCRAFT

We continue to work with our airline partners to increase the use of next generation aircraft for passenger movements. The Airbus A320neo and Boeing 737 Max are both modern aircraft that deliver carbon savings of up to 20% compared to their original models. These savings are delivered through improved engine efficiencies and aerodynamic enhancements.

Our new RBS commits us to report the percentage of next-generation aircraft based at LLA against a target of 60% by 2028. In 2024, we reached 60%, therefore reaching our target well ahead of schedule.

FIGURE 4: % OF NEXT-GENERATION BASED AT LLA BY AIRLINE

■ Wizz
■ Ryanair
■ easyJet
■ TUI

100%
57%
44%
0%

60%
of aircraft based at LLA are next-generation

FIGURE 5: CHART SHOWING YEAR-ON-YEAR PROPORTION OF NEXT GENERATION AIRCRAFT FLIGHTS
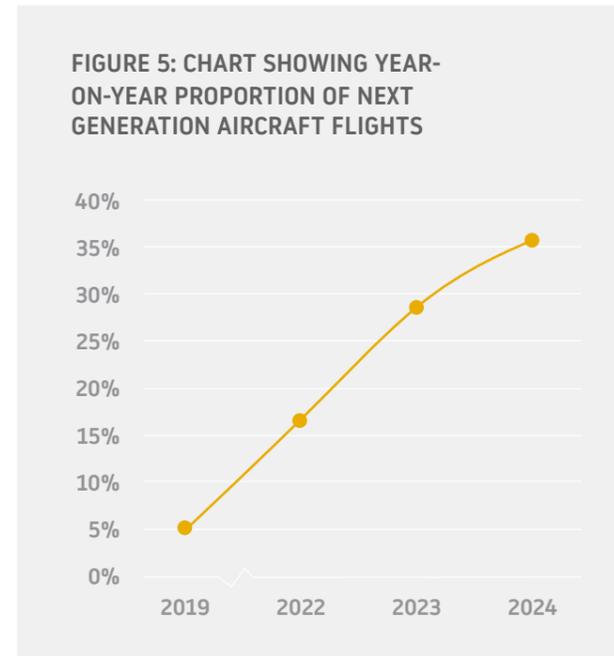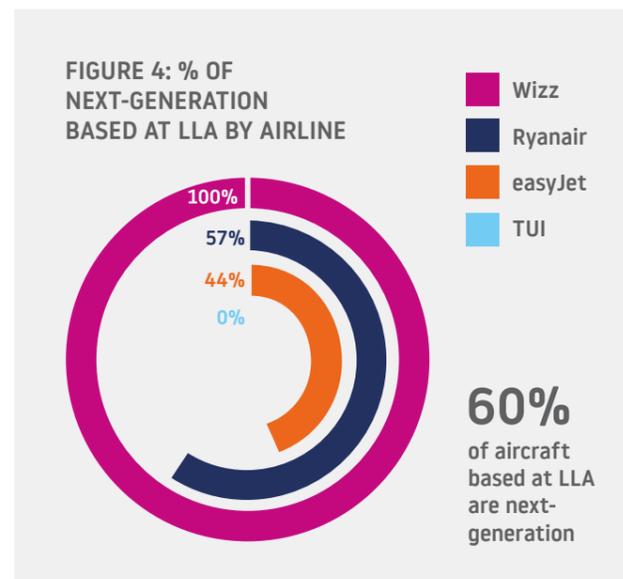
As you can see in Figure 5, the proportion of next-generation flights also increased in 2024 – reaching 36%, up from 27% in 2023. Compared to older aircraft models, this saved 16,913 tCO_2e in 2024, across 46,300 flights through LLA. These aircraft are crucial in delivering carbon reductions in aviation and enabling LLA to grow responsibly, and we are seeing tangible reductions in aircraft passenger emissions as a result of introducing them.

Where airlines continue to operate older aircraft, airline partners have upgraded them with aerodynamic improvements such as winglets or sharklets, which can reduce fuel burn by 4-6%. In 2024, 54% of all aircraft flying through LLA had these improvements. Excluding next generation aircraft, 19% of aircraft had either winglets or sharklets, resulting in emissions savings of 1,500 tCO_2e compared to aircraft with no modifications.

2024 UPDATES TO TOTAL EMISSIONS REPORTING METHODOLOGY

In 2024, we updated our carbon disclosure framework to align with the ISO 14064-1:2018 standard. This included a new methodology with updated data collection processes, boundary definitions, and calculations. We have also introduced a detailed supplementary carbon footprint report outlining the work undertaken on LLA's journey to Net Zero and providing further detail on emissions sources and performance.

To remain compliant with Level 4 of the Airport Carbon Accreditation scheme, we have expanded the emissions sources we disclose, including landside cargo transport and third-party staff commute. This is in addition to the introduction of CCD, supply chain emissions, and Well-To-Tank emissions introduced and reported upon in 2023.

We also introduced an enhanced approach to calculating LTO in 2024, using available data for true taxi-in and taxi-out times at Luton. For comparison and consistency, we also applied this methodology to recalculate our 2023 and 2019 LTO emissions.

This, along with our approach to reporting supply chain emissions, CCD emissions reporting and Well-To-Tank emissions is set out in the Carbon and GHG Management Report available on our website.

OPERATIONAL IMPROVEMENTS

Sustainable Aviation, an industry body, has produced a Net Zero roadmap which anticipates that operational efficiency improvements can deliver up to a 5% reduction in carbon emissions. These improvements include reducing the use of aircraft Auxiliary Power Units (APU), improving taxiing practices, and following more efficient climb and descent practices.

We are working with airlines and ground handling agents to implement these improvements, while monitoring their uptake and impact to maximise the opportunity they present.

SUSTAINABLE AVIATION FUEL

Switching from traditional kerosene-based fuel to Sustainable Aviation Fuel (SAF) is one of the most practical and impactful ways to reduce aircraft lifecycle emissions whilst hydrogen and electric technologies continue to develop. SAF is produced from sources such as cooking oils, certain crops, and even household waste, and offers lifecycle carbon savings of up 70% or more.

According to Sustainable Aviation's Net Zero roadmap to 2050, SAF plays a vital role in decarbonising the aviation sector, contributing substantially more to emissions reduction than any other decarbonisation measures up to 2050.

Recognising its potential, the UK Government announced in 2022 that it would introduce a SAF mandate from 2025, aiming for at least 10% of all jet fuel to come from sustainable sources by 2030.

Our RBS commits us to work with our airlines with an aim to drive up the proportion of SAF used at the airport. In 2024, we continued to engage with our airline partners to support their transition to SAF, joined the pledge for the RISE Back British SAF campaign, while also working closely with experts in the industry to map out the optimal path ahead.
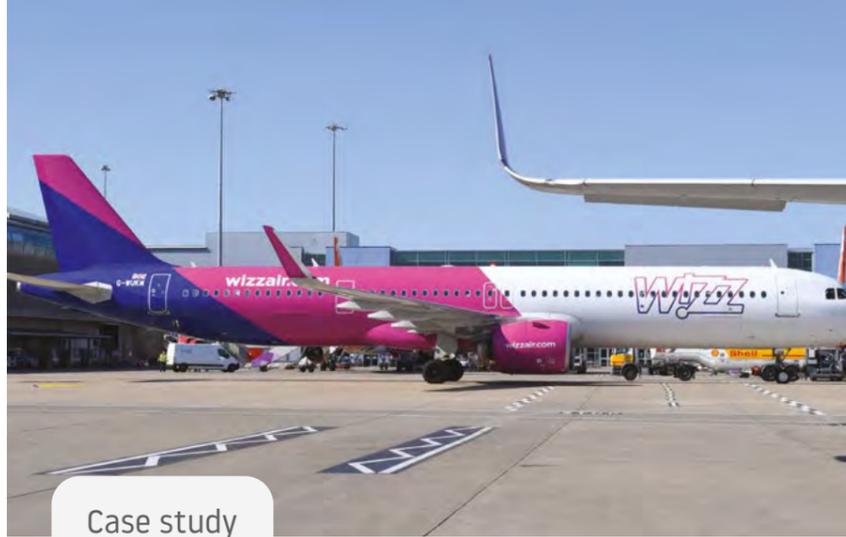
Case study

WIZZ AIR TAKES OFF

In a significant milestone, Wizz Air UK completed the transition of its entire LLA based aircraft fleet to the next generation Airbus A321neo a full year ahead of schedule.

The A321neo aircraft offers significant environmental benefits, delivering a 20% reduction in fuel consumption and halving nitrogen oxides (NOx) emissions compared to the previous models. As one of LLA's largest carriers, Wizz Air UK's proactive fleet upgrade marks a key step in reducing the airport's overall carbon intensity and minimising noise pollution for local communities.

This move supports our Responsible Business Strategy and forms part of a broader push to encourage the adoption of cleaner, quieter aircraft through close collaboration with airline partners. It highlights what's possible when ambition, innovation and partnership come together.

"Wizz Air's business model is firmly centred on providing affordable and more sustainable options for our customers. Together, with LLA, we are leading the way in the decarbonisation of the aviation industry. We have invested millions of pounds in the next generation aircraft technology, with 100% of our UK fleet now the fuel-efficient Airbus A321neo, and the youngest in Europe. We have also invested in Sustainable Aviation Fuel and its production in the UK.

While airlines are making progress towards decarbonisation through technology investment, delays in infrastructure development and outdated regulatory frameworks are hampering the industry's progress. Together with London Luton Airport, a key base for Wizz Air in the UK and the home of our UK head office, we believe we have a vital role to play in driving decarbonisation efforts."

— **Marion Geoffroy, Managing Director, Wizz Air UK**

TRIALLING ELECTRIC GROUND SUPPORT EQUIPMENT

2024 saw the launch of a ground-breaking trial of electric Ground Support Equipment (eGSE) at LLA.

As part of our approach to enabling fully electric, low-carbon aircraft turnarounds, we equipped five aircraft stands with eGSE including battery-powered ground power units and electric pushback tugs, baggage belts and passenger stairs.

Unlike traditional systems that require costly fixed electrical infrastructure at each stand, our trial introduces an innovative 'battery as a service' model. Mobile battery packs are centrally charged and transported to the aircraft stand as needed, powering the equipment without the need for disruptive construction works or major capital expenditure. This approach is believed to be an industry first, showcasing how operational innovation can unlock more agile, cost-effective routes to decarbonisation.

The proof of concept is ongoing, and we're now working closely with delivery partners to assess the potential for scaling the solution across all 45 aircraft stands. Data is being gathered on equipment use, energy demand and actual carbon savings to determine long-term feasibility.

As outlined in our RBS, we remain committed to requesting the use of low-carbon[18] fuels in the short term and to achieving 100% zero-carbon pooled equipment by 2035. This eGSE trial represents a key step forward on that journey.

RESEARCH PARTNERSHIP

As part of our RBS commitment to foster academic partnerships that support the future of flight, LLA has has joined forces with Cranfield University - one of the UK's leading institutions for aerospace research and innovation. Announced in 2024, the collaboration will explore practical solutions to decarbonise air travel and modernise airport infrastructure, from Sustainable Aviation Fuels and zero-emission ground operations to next generation propulsion systems and digital airspace design. The partnership also creates opportunities for student research projects, internships and knowledge sharing that will help shape the aviation workforce of tomorrow.

The agreement formalises a long-standing relationship between LLA and Cranfield and signals a shared ambition to accelerate progress on climate goals through innovation and research.

This partnership demonstrates the power of collaboration in meeting our strategic commitment to support future flight technologies - and in doing so, strengthen the UK's position as a leader in finding solutions that reduce the environmental impact of air travel.

18. Low-carbon includes the use of Electric Vehicles and HVO as fuel for vehicles and stationary sources (e.g. back-up generators).

Surface access

APPROACH

Surface access (how employees and passengers travel to and from the airport) represents 10% of our scope 3 carbon emissions, second only to aviation in terms of our total carbon footprint.

Continuing to reduce this impact is vital - both for our Net Zero goals and for enhancing quality of life for local residents.

Our 2024 Airport Surface Access Strategy (ASAS) outlines our commitment to this objective, setting a target to increase sustainable travel by passengers to 47% and by staff to 35%, and laying out our five-year programme to accomplish this.

While we work to increase the modal share of passengers using sustainable transport modes, we're also working with the airport's surface access partners to further reduce emissions from these sources. We define 'sustainable travel and transport' as rail, coach or bus. Our strategy prioritises sustainable alternatives for cars and taxis, therefore supporting the decarbonisation of the remaining modal share.

Collaboration remains essential to delivering progress. For example, we've worked closely with Luton Council on their Local Transport Plan (LTP5), actively participating in stakeholder workshops to support sustainable transport across the borough.

PERFORMANCE DATA

In 2024, we saw good progress on employee travel, with 27% of our people travelling to and from work using sustainable transport - up from 21% in 2022 (we currently measure this metric every two years). However, we have not returned to our highest performance, which was reached before the 2020 Covid pandemic.

We lost ground on our passenger numbers, dropping from 38% in 2023 to 29% in 2024. Breaking this down, we can see it is mostly driven by a 3% drop in rail travel and a 6% drop in coach and bus travel. A significant cause for this drop has been attributed to the impact of TCP2 fire with drop-off restrictions at the mid-stay car park removed and a new paid drop off zone reducing the competitiveness of public transport options.

We are currently reviewing how best to overcome this, while continuing to deliver a convenient, accessible and affordable travel experience for our passengers.

Whilst also ensuring we review our car parking pricing strategy to incentivise the use of electric and low-emission vehicles by passengers using our car park and drop off options.

KEY UPDATES FROM 2024

In 2024, our ASAS and Travel Plan were approved by Luton Council. They outline clear objectives, policies and targeted actions to achieve our surface access travel goals.

In 2024, we also opened a new Onward Travel Centre at LLA, which is both more passenger friendly and actively promotes sustainable travel.

We also recruited for a Sustainable Travel Plan Coordinator, an exciting new role central to fulfilling our travel goals.

STAFF TRAVEL

We conduct a staff travel survey every other year and successfully ran 2024's edition with a response rate of 14%, exceeding our target by 2%. The survey provides essential data to identify and address barriers to more sustainable commuting for over 10,000 airport pass holders. The survey is a requirement of our planning permission and it is invaluable in helping us deliver on our commitment to reducing carbon emissions.

Alongside the survey, we secured external funding for further research in partnership with the Future Transport Visions Group (FTVG). The researchers interviewed 100 people to explore commuting barriers, perceptions, and behaviours across demographics, resulting in four personas (see figure 6 opposite). The findings also recommended how we could start to use AI to overcome some of these barriers and engage more effectively with our diverse staff demographic.

These combined insights make up the first steps in a project to engage more deeply with staff around reducing carbon emissions from travel, helping us create targeted, data-led strategies that future-proof our travel planning.

FIGURE 6: LLA STAFF PERSONAS

Susie
- Safety and comfort are priorities
- Juggling multiple journey types (commute, school-run, groceries, evening clubs)
- Will pay more for comfort

Omar
- Willing to make compromises in their journey
- Used to buses but 'soon to be lost' if buys a car
- Price sensitive

Rich
- Autonomy and status a priority
- Open to cycling for health and status but lives outside Luton area
- Not price sensitive
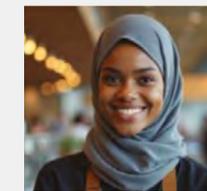
Elli
- Reliability and safety are priorities
- Open to lift sharing but 'soon to be lost' if buys a car
- Sensitive to bad weather
- Price sensitive

FIGURE 7: COMPARES 2022 AND 2024 MODE SHARE FOR LUTON STAFF

2022 MODE SHARE

| Car 75% | Bus & coach 11% | Rail 7% | Walk 4% | Cycle & scoot 2% | Taxi 1% |

2024 MODE SHARE

| Car 70% | Bus & coach 16% | Rail 5% | Walk 5% | Cycle & scoot 1% | Taxi 3% |
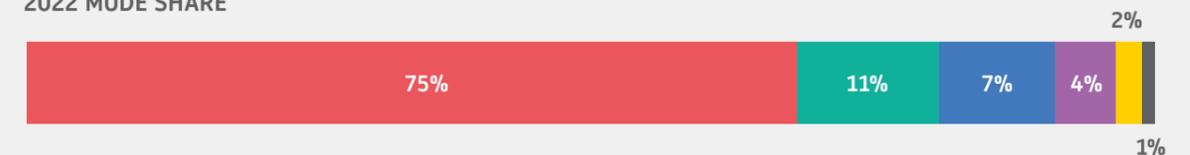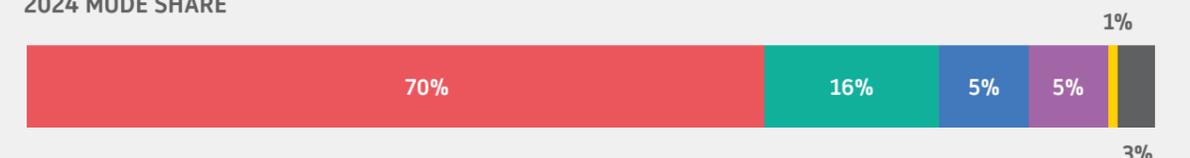
Legend: Car | Bus & coach | Rail | Walk | Cycle & scoot | Taxi

RAIL

We continued our partnership with the Luton Airport Express, East Midlands Railway (EMR) and the DART. In its first full year of operation, the DART carried more than 2.9 passengers from January to December.

A new advertising campaign titled "32 minutes to go" was launched, and we trialled QR code ticketing for enhanced passenger convenience.

Our collaboration with Luton Council, EMR and the DART was recognised with the Collaboration of the Year award at the National Transport Awards. By joining the Beds and Herts Community Rail Partnership, we further strengthened community engagement through initiatives such as hosting local scout troops and promoting rail travel.

BUSES

We have been proactively building partnerships with current and potential future bus operators serving the airport. New bus services include Stagecoach's Luton Airport Express (LAX), increased frequencies to Milton Keynes, and Arriva's new route to Leighton Buzzard. Discussions are also underway for a route to Aylesbury.

Successful staff promotions with Stagecoach and Arriva via the LLA Employee Travel Club have seen excellent uptake, and our new digital information totems help enhance the overall passenger experience.

COACHES

We implemented new concessionaire contracts with Arriva Green Line and National Express, standardising the use of Euro 6 coaches, the latest and most stringent exhaust emissions standard. A marketing campaign with National Express featured coach wraps promoting travel to the airport through central London, successfully raising visibility and awareness.

TAXIS

We secured an agreement with Luton Council to grant electric taxis access to the Airport under a licensing scheme. Currently, 126 taxis hold licences, with 43 of these being electric vehicles eligible for discounted licensing rates.

ACTIVE TRAVEL

We conducted an active travel audit to identify strengths and areas for improvement. As part of our ASAS commitment, we shared these findings with Luton Council, setting the stage for active travel to become a key area of focus in 2025.

BUSINESS TRAVEL

LLA recognises that travel for work is a necessary part of business. It allows for collaboration, learning, face-to-face engagement and building relationships across the industry. As part of our carbon reduction strategy, LLA wants to encourage staff to travel in the most sustainable way possible. LLA has developed guidance around business travel, encouraging staff to consider virtual options for meetings and events, and to use public transport such as rail or coach for journeys wherever possible.

"Our collaborative partnership with London Luton Airport and Luton Rising has transformed rail connectivity, offering one of the fastest airport-to-capital connections in the UK while driving a significant shift toward sustainable travel options. As a result, rail journeys increased by more than 50% during the year following the launch of the Luton Airport Express and DART services. We're proud that this seamless integration of services provides passengers with both convenience and environmental benefits."

— Jenna Cowie, Interim Commercial Director, East Midlands Railway
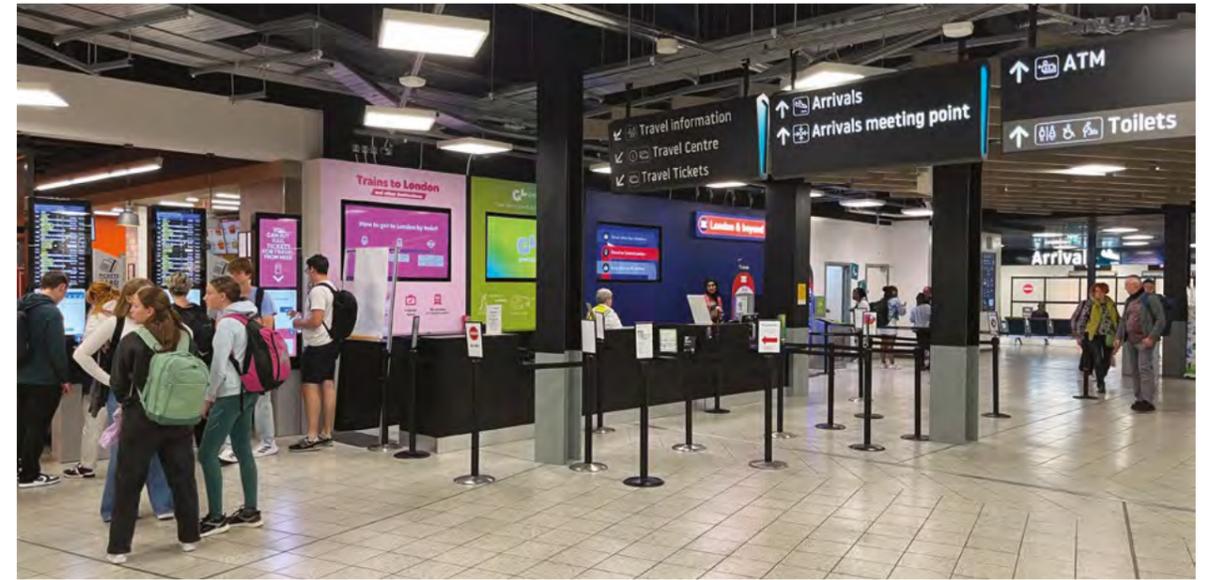
NEW ONWARD TRAVEL CENTRE

In November 2024, we unveiled our new Onward Travel Centre, a key capital investment in LLA's Landside Strategy. This enhancement places travel information and ticketing directly in the main arrivals flow, creating an intuitive experience for passengers. The Centre features modern service desks for National Express, Arriva Greenline, and Govia Thameslink Railway, along with integrated rail ticket machines displaying departure information to streamline journey planning for travellers.

❄ De-Icing

APPROACH

We continue to reduce the environmental impact of aircraft and ground de-icing through more efficient technologies, targeted application and improved fluid recovery systems.

Our main de-icing contractor, IDS, uses a forced air/blend temperature technique to reduce the amount of glycol required, whilst our GlyVac unit helps collect residual fluid from de-icing areas across the airfield.

In line with our RBS, we are working to shift de-icing operations from aircraft stands to the new de-icing pad on Foxtrot taxiway. We are working with de-Icing providers to accelerate this shift in 2025 onwards whilst minimsing the impact on operational performance.

This approach improves fluid containment, reduces the need for reapplication, and helps prevent glycol from entering the drainage system. Pollution control valves are in place, and recovered glycol is sent for recycling.

We primarily use acetate-based products for ground de-icing - considered the most environmentally friendly option - and our GPS-enabled equipment helps maximise coverage and efficiency.

Guests

APPROACH

Guest satisfaction remains at the heart of our mission, and we continually strive to ensure everyone travelling through LLA enjoys an outstanding experience. We have successfully embedded the LLA Way - a comprehensive guest experience framework - into our culture, guiding every employee, from frontline staff to third-party teams, to deliver exceptional service.

Our passionate and dedicated guest experience team, many multi-lingual, ensure guests feel comfortable, supported and valued throughout their journey. Regular feedback via ACI's Airport Service Quality (ASQ) programme and Net Promoter Scores (NPS) drives continuous improvement in the guest experience.

Recognising that excellent guest service is everyone's responsibility, we provide comprehensive training and certification to all frontline employees, including security personnel, cleaning teams and third-party staff through our Licence to Serve training. Every new frontline team member at LLA is inducted and trained in the principles and practices of the LLA Way, ensuring our high standards are met by everyone.

PERFORMANCE

This year marked significant achievements. We advanced to Level 3 in ACI's Airport Customer Experience Accreditation, the only UK airport to reach this milestone. Our ASQ scores improved further, reaching 4.07 in 2024 - our highest score ever. Additionally, our guest experience team proudly secured two prestigious awards at the UK Customer Experience Awards: CX Team of the Year (Large Company) and Best CX for Vulnerable Customers.

We also performed well in the Department for Transport's CAA Departing Passenger Survey, which evaluates the security screening at selected UK airports. LLA had the highest percentage of 'very satisfied' passengers in the 'Level of satisfaction with security screening at UK airports, 2023' category.

FIGURE 8: ASQ SCORES

Year	Score
2019	~3.93
2023	~4.07
2024	~4.08

"We are so proud of the record satisfaction scores we achieved in 2024. This comes a result of closely listening to guest feedback, investing in our facilities, collaborating with our airport partners, and - above all - the absolute dedication of our skilled guest experience colleagues. We remain totally committed to delivering a safe, simple and friendly experience for the millions who travel through London Luton Airport each year."

— Clare Armstrong,
Head of Guest Experience
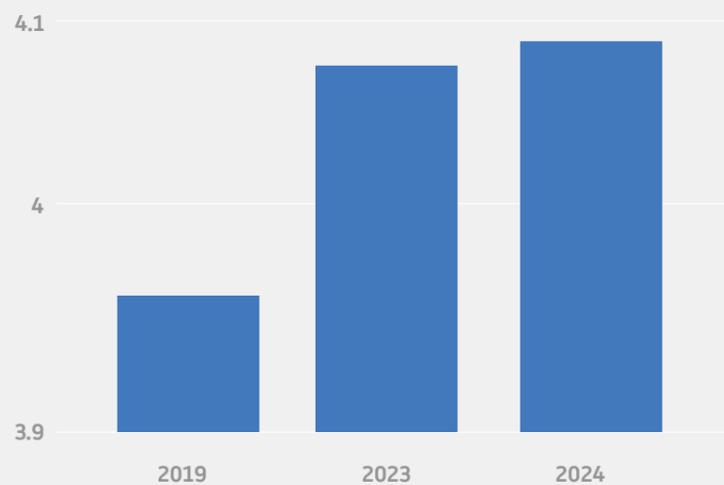
LLA EXCELLENCE ACADEMY

Opened in April 2024, the Excellence Academy provides a dedicated space for the internal and external LLA community to come together and learn, share best practice and collaborate.

The facility allows the airport to showcase the amazing work happening across different teams, and we've been proud to host other airports and organisations to visit and learn from our experience.

There are plans to develop more structured training content for the Excellence Academy, as well as aligning even more closely with Luton Council's strategic needs in the future.

LLA WAY UPDATE

The LLA Way, introduced in 2022, is now deeply integrated across our airport ecosystem, defining service standards and ensuring a high level of consistency across all guest interactions.

We are pleased to confirm that 100% of LLA staff are trained in the LLA Way, and all new joiners receive the training. Where appropriate, metrics within the LLA Way are connected to employee incentives.

When we saw how our approach was improving our ASQ scores, we extended the training offer to third-party employees via our Licence to Serve programme. By the end of 2024, over 1,400 employees from across 52 businesses had completed the training. We'll keep growing those numbers in 2025.

In June 2024, we launched our new quarterly Service Chain Meetings, with the strapline of 'Connecting teams, inspiring excellence, delivering unforgettable journeys'. These meetings take place at the Excellence Academy and seek to foster collaboration and alignment among service stakeholders - from retailers to security teams. Any third-party that has completed Licence to Serve training can attend the meetings, where they'll be presented with their very own LLA Way pin badge.

All future projects at LLA continue to be guided by our overarching LLA Way Service Strategy.

THE VOICE OF THE CUSTOMER

Our guest relations team is focused on aligning all customer feedback gathered from ASQ touchpoints. This allows us to have more meaningful discussions about how the different feedback is linked together and how it can be addressed.

The goal is to then use this customer feedback to inform our new Service Chain Meetings, bringing external stakeholders together to collaborate on delivering the desired guest experience.

In recent years, continued investment in the guest experience has led to new pick-up and drop-off zones, next generation security, the mezzanine redevelopment, myLLA enhancements, and new retail offerings, contributing significantly to our highest-ever guest satisfaction ratings.

FOCUS FOR 2025

Looking ahead, we applied to set the BSI Kitemark for service excellence - a recognised symbol of trust and quality, demonstrating that a product or service has undergone rigorous testing and meets or exceeds industry standards. We are also working to achieve ACI Level 4 Accreditation.

Alongside this, we are developing the Guest Experience Manual (GEM) to standardise procedures across airlines and guest touchpoints. We are also on track to open the new Assisted Travel Lounge for our passengers.

Finally, in 2025, we will do more to recognise and reward our staff for exceptional service.

Case study

ACCESSIBILITY

We remain committed to making LLA accessible for all guests. We continue to work hard to ensure our facilities make travelling through the airport as stress-free and seamless as possible.

In 2024, we introduced 18 new help points and designed a dedicated Assisted Travel Lounge with sensory areas and adult changing facilities. The new lounge is intended to improve the experience and efficiency for Persons with Restricted Mobility (PRM), because it will be a larger space with better circulation for people, resources and equipment.

Despite operational challenges due to rising demand (a 25% increase year-on-year), we maintained a 'good' CAA accessibility rating in 2024, highlighted by commendations for our staff training, contingency planning, and disability collaboration.

We were also thrilled to receive the Gold Award in the Best Customer Experience for Vulnerable Customers category at the UK Customer Experience Awards.

In 2024, we continued to host regular accessibility focus groups and our Accessibility Forums, receiving some wonderful feedback from participants on the value this provides.

In March, our annual Accessibility Familiarisation Day successfully provided guests with disabilities an opportunity to experience every step of the passenger journey, including check-in, security and the departure lounge, before boarding an aircraft to talk with cabin crew. The day was supported by multiple airport teams, including guest experience, security, airport operations and the fire service, as well as our special assistance provider, Wilson James, and airline partner easyJet.

HIDDEN DISABILITIES

We continue our commitment to assisting guests with hidden disabilities. In 2024, we trained 100 staff members in Dementia Friends and Sight Loss Awareness programmes. Additionally, we maintain ongoing delivery of our "How May I Best Assist You?" training to ensure that guests with hidden disabilities receive compassionate, personalised support.

RELIGION AND SPIRITUALITY

Recognising the importance of supporting guests' diverse religious and spiritual needs, we have two multi-faith prayer rooms. Alongside offering places to pray, our multi-faith chaplaincy team provide comfort, emotional support and, for those who need it, access to local charities and support groups.

Jet2 partnership

In late 2024, Jet2.com and Jet2holidays revealed that LLA would become their newest operational hub in the United Kingdom, commencing services in summer 2025. Jet2 is renowned for its excellent customer service, aligning perfectly with the airport's commitment to provide a simple and friendly experience for all. For their inaugural season at LLA, this major tour operator and airline operated 17 routes spanning Europe, the Mediterranean and the Canary Islands, addressing strong customer and travel agent demand throughout the area.

The company has based two new Airbus A321neo aircraft at LLA, providing both package holidays through Jet2holidays and standalone flights via Jet2.com. This expansion brings substantial economic benefits to the region, with an initial creation of over 125 employment opportunities across various departments including pilots, cabin crew, maintenance and airport operations.

A LANDMARK YEAR FOR PASSENGER EXPERIENCE

In 2024, LLA hit two high notes: winning ACI Europe's prestigious Best European Airport award and ACI's Customer Experience Accreditation Level 3 – the only UK airport to achieve this. We also recorded our highest-ever passenger satisfaction scores. These achievements highlight our airport-wide strategic focus on making the travel experience simpler, friendlier and more enjoyable for all.

The Best European Airport judging panel praised our joined-up approach to sustainability management, spotlighting major milestones including the launch of the DART and Luton Airport Express services. Meanwhile, our high satisfaction rating saw 80% of passengers describing their experience as "very good" or "excellent".

Key factors behind this success included:

- Early rollout of next generation security scanners, speeding up screening
- Over 1,400 staff trained in the LLA Way, boosting service quality across 52 airport businesses
- New passenger lounges and the UK's largest airport restaurant, enhancing comfort and choice

The recognition didn't go unnoticed. News of both awards spread widely online - and was met with real pride on the ground. LLA marked the moment for our Best European Award with a company-wide pizza party, celebrating the hard work of staff across the airport.

Our Community

The impact of our airport goes far beyond the terminal. LLA's unique ownership model means that the success of the airport directly benefits the wider Luton community - and we take that responsibility seriously.

We want everyone in our community to have the opportunity to thrive. That's why we work in partnership with local businesses, schools, charities and community organisations to deliver positive social impact and long-term value. Whether it's supporting local employment, developing skills, investing into our Community Trust Fund, or championing inclusive economic growth, our aim is simple: be a force for good to allow those who live near the airport, are affected by its operations, or use its services, to thrive.

We've made a commitment to be a good neighbour, to help build stronger, healthier, more resilient communities, and to open up opportunities for future generations.

Through this work, we contribute to Luton Council's 2040 vision by supporting a fairer, more inclusive economy, improving population wellbeing, and helping to create a strong, empowered community where everyone can reach their full potential.

Highlights from 2024

60% OF LLA'S TOTAL SUPPLY CHAIN SPEND CAME FROM WITHIN A 25-MILE RADIUS OF THE AIRPORT, **AN INCREASE OF 7% SINCE 2023**

£100k FUNDS RAISED FOR OUR **TWO CHARITY PARTNERS**

£182k INVESTED, MEETING OUR RBS COMMITMENT ON CTF AND GFF FUNDING **BENEFITING 19,161 PEOPLE**

EDIE AWARD FINALIST FOR 2023 SUSTAINABILITY REPORT

1 INAUGURAL EMPLOYEE VOLUNTEER AND FUNDRAISER OF THE YEAR CELEBRATION EVENT

SUCCESSFUL LAUNCH OF OUR CLASSROOM TO CAREERS ROADMAP. DELIVERING OUR SKILLS AND EDUCATION WORKSHOPS

12% OF WORKFORCE VOLUNTEERED COMPARED TO 9% IN 2023 – **EXCEEDING OUR RBS TARGET**

"The airport is one of Bedfordshire's most significant economic drivers, working with hundreds of local businesses to supply goods and services, creating thousands of direct and indirect jobs, and serving as a catalyst for opportunity and growth. London Luton Airport has firmly established itself as a linchpin of the regional economy, extending its positive impact across Bedfordshire and beyond."

— Justin Richardson,
**Chief Executive, Bedfordshire Chamber of Commerce**

RBS commitments

Commitment	Status	Progress
Implement new air quality monitoring equipment in 2024 that helps to further understand source effects in real time.	Performing	8 air quality monitors are now installed at LLA.
Work towards achieving the targets outlined in our Noise Action Plan 2024-2028.	Performing	On track. We are making good progress in delivering the Noise Action Plan. More detailed updates can be found in the AMR supplement.
Seek to improve local biodiversity by developing at least three biodiversity initiatives by 2027.	Performing	We now have two initiatives up and running – our Greener Future Fund and our employee volunteering scheme.
Work towards enabling 100% of eligible Greener Future Fund beneficiaries access to environmental education programme by 2027.	Performing	On track, with the launch of our Environmental Education programme.
Maintain our contribution to the Community Trust Fund at £150,000 per annum and aim to contribute £100,000 to the Greener Future Fund.	Performing	On track. We contributed £150,000 to the Community Trust Fund and £61,000 to the Greener Future Fund in 2024.
Invest £30,000 per year to support selected local, regional or national sustainability initiatives.	Performing	On track. We invested £40,000 during 2024 to sustainability initiatives.
Develop and deliver Essential Transferable Employment Skills workshops to at least five local schools annually from 2025 onwards.	Performing	We exceeded this target, delivering our workshops to 10 schools in 2024.
Work towards achieving at least five enterprise advisers paired with local schools by 2027.	Performing	We're on track, pairing four advisors in 2024.
Work to maintain at least 25% of total supply chain spend within a 20-mile radius of the airport.	Performing	We exceeded our target, with 54% of spend in 2024 within a 20-mile radius of LLA.

Performing
Performing as expected or exceeding targets set.

Monitoring
Behind target and requires attention. Regular monitoring and potential action required.

At risk
Off track and at risk of non-compliance. Immediate corrective action needed.

Primary and secondary school skills and education workshops

Collaboration with academia supporting the future talent of our aviation industry

Insight and hands-on work experience through a structured career pathway

Join the future workforce
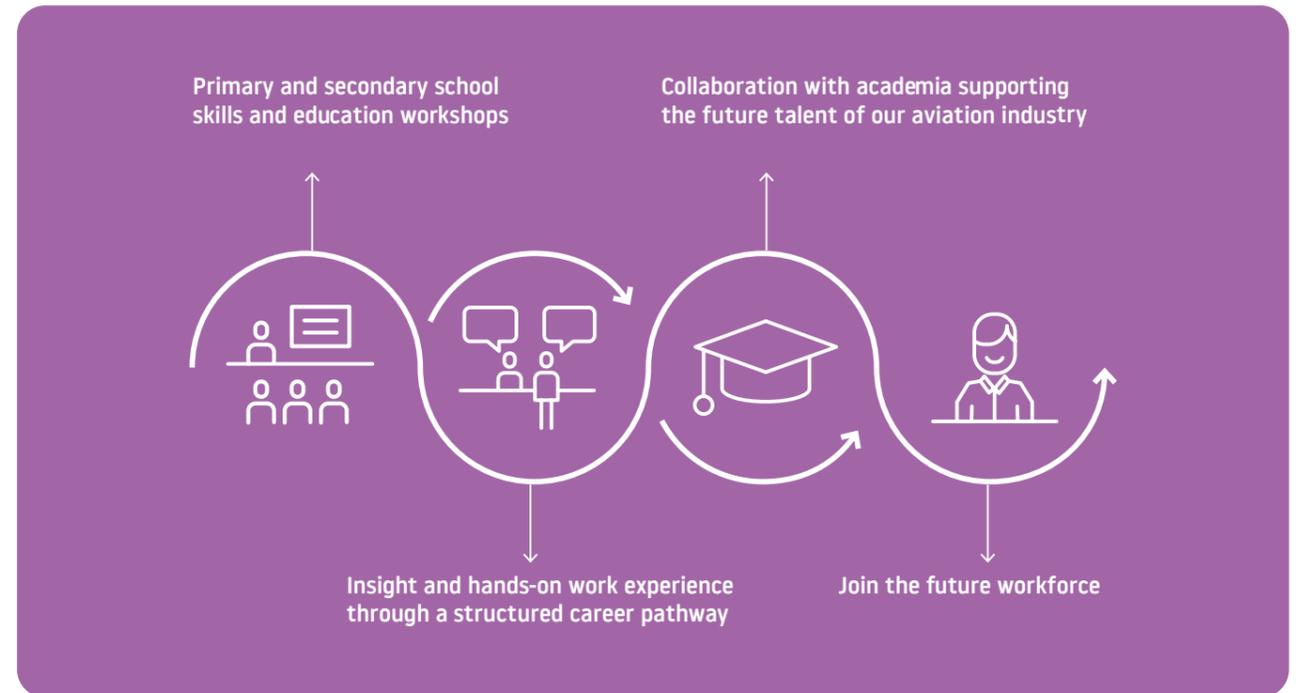
Community and social value

INTRODUCTION

LLA has been actively contributing to change in the local community for many years, striving to ensure we make a positive difference through the types of programmes and interventions we drive. We are always looking for ways to increase the value we contribute. In 2024, we focused on learning how to better measure the social outcomes of our community activities to understand how effective they are. Assessing our work in this way will help to ensure we deliver the right types of interventions and create a greater positive impact in our local community.

INVESTING IN THE FUTURE OF OUR COMMUNITY

Working closely with Luton Borough Council, we are investing in the future of our community through structured skills, training and career development programmes aligned with the airport's strategic objectives and Luton Council's 2040 vision.

Our central Classroom to Careers education and skills roadmap, is aimed at supporting local schools and community groups. It has been designed to align with Luton Council's 2040 vision and provides tailored learning interventions from early education right through to employment. These interventions include environmental education, essential skills workshops, apprenticeships, work experience and university partnerships.

SUPPORTING · **LUTON 2040** · **THE VISION**

"Skills Builder Partnership is proud to have been working in collaboration with London Luton Airport in 2024 to support LLA's Social Mobility and Sustainability goals. We have launched the hugely successful Essential Skills Workshops that connect local students with career opportunities while developing the crucial competencies and essential skills needed for success at the airport and look forward to building on this work in 2025."

— **Sophie Holmes, Lead Associate for Employer Programmes, Skills Builder Partnership**

Case study

CLASSROOM TO CAREERS LAUNCH

In 2024, we launched our Classroom to Careers programme - an exciting new chapter for our skills and education roll out in our community. Collaborating with our internal HR and Security teams and working closely with Luton Council's Children, Families and Education team to identify local schools and colleges, we created a central roadmap with tailored interventions to support young people.

The initiative offers practical skills and employment pathways and seeks to inspire the next generation of aviation talent. Here are a few highlights from the programme's first year:

• **The Environmental Education programme** is managed by our Sustainability team in partnership with the Forest of Marston Vale. The programme provides young Lutonians aged 8-11 with an opportunity to learn more about the environment and biodiversity, aligning with our RBS commitment to provide all eligible GFF beneficiaries with access to environmental education by 2027.

In 2024, 120 local pupils from Tennyson Road primary school (a GFF beneficiary) visited the Forest of Marston Vale in February 2024 as part of the Environmental Education programme, planting over 800 trees with the support of our LLA volunteers.

Carla Gotch, Head of Tennyson Road School, commented: "One of the best ways for children to learn is by doing and our visit to the Forest of Marston Vale has provided our pupils with a fantastic first-hand opportunity to develop their understanding of biodiversity, the importance of nature and how all living things are connected."

• **The Essential Skills Workshops** are designed to equip young people with a fresh insight into skills, jobs and career opportunities at LLA. These skills include listening, speaking, teamwork and problem-solving (key skills required in the workplace). Fun, interactive and thought-provoking skills-based tasks for pupils to learn, adapt and demonstrate what they've learned.

In 2024, we engaged with 200 students from 10 local schools.

The workshops were supported by 29 LLA employee volunteers, some of whom were part of our leadership development programme, enabling them to transfer their newfound skills knowledge and expertise into the local community.

Looking ahead, we are particularly excited about the official launch of our LLA apprenticeship programme in 2025. Having identified three partners (two local and one online), we will roll out five placements per year from 2025, creating pathways to employment aligned with the Luton 2040 vision.

COMMUNITY TRUST FUND AND GREENER FUTURE FUND

LLA funds a variety of local initiatives under the themes of Healthy Today, Skilled Tomorrow, Alleviating Poverty and Environmental Impact.

We provide direct financial support through our Community Trust Fund (CTF), which offers grants of £250 to £10,000 to projects that benefit communities across our region. We also provide funds through the Greener Future Fund (GFF), which is partly funded through our existing Community Trust grant funding process. This fund is focused on supporting local environmental and biodiversity projects.

The CTF is managed by our partner, Bedfordshire Luton Community Foundation (BLCF), who are proactively using Luton Council's 2040 vision themes to guide its granting.

In 2024 we invested a combined total of £181,702 into our CTF and GFF (part of our CTF) impacting 22 organisation and 19,161 local beneficiaries.

CHARITABLE GIVING

At LLA, we have a longstanding employee charity of choice partnership programme.

In 2024, we concluded our successful four-year partnerships with Luton Foodbank and East Anglian Air Ambulance, raising over £300,000 in total, and £100,000 in 2024 alone. To mark this, we held a celebratory event hosted by our CEO Alberto Martin, bringing together our charity partners and our employee volunteers of the year.

Fundraising highlights included the annual golf day (£17,284), a four-day bike ride across Ireland (£61,000), and various community and fundraising events totaling over £100k.

We are delighted to confirm that our two new charity partners are the National Literacy Trust, a UK based charity focused on improving literacy skills and TOKKO Youth Hub, a Luton-based charity committed to supporting young people. Both partners will help support LLA's skills and education ambition, working with children and young people, and strengthening the delivery of our Classroom to Careers roadmap to increase awareness, skills and education opportunities.

In 2024, we also continued to generate charitable funds through initiatives such as employee match funding (boosted significantly during Giving Back Month), customer donations via foreign currency collections and car park contributions.

Case study

CELEBRATING OUR CHARITY PARTNERSHIPS

Last year, we were proud to celebrate an outstanding four-year partnership with Luton Foodbank and East Anglian Air Ambulance. Individuals and teams raised over £300,000 - and 2024 was the crowning achievement.

Over the course of the year, individuals and teams from across LLA went above and beyond to raise over £100,000 for our partners, through events like our hugely successful annual charity bike ride, golf day, charity football tournaments, and many more individual fundraising events.

We commemorated these achievements with a special celebration, saying thanks and farewell to our partners, and honouring our employee volunteers of the year who went the extra mile to support their work.

SPONSORING LOCAL AWARDS

As well as our quarterly grant giving and employee match funding programmes we invest further into the community through the sponsorship of awards and community initiatives. LLA supports three local awards, reinforcing our commitment to community recognition and enhancement: the Lifetime Achievement at the Love Luton Awards, Luton in Bloom and the Community Interest Awards.

VOLUNTEERING

As a result of providing every employee with two paid volunteering days per year, participation reached new heights in 2024, with 114 colleagues volunteering 573 hours - up from 380 hours in 2023.

Highlights included:

- **Leading volunteers:** Volunteers from our leadership programmes generously offered their time and expertise, supporting both our employment skills workshop and environmental activities at the Forest of Marston Vale.

- **Taking care of the community:** Volunteers from across the LLA ecosystem rolled up their sleeves to support various meaningful initiatives - from woodland restoration at Marston Vale, to a community litter pick which resulted in the collection of 61 bags of rubbish.

- **Giving Back Month:** Last August, we launched our inaugural Giving Back Month - a dedicated month where employees donated their volunteer time to give back to a total of 138 hours to our community. We also boosted fundraising efforts by doubling match funding contributions throughout the month. Given its success, we're planning for Giving Back Month to return in 2025.

FOCUS FOR 2025

Looking ahead, we are exploring new opportunities to enable our people to use their skills and expertise locally with our two new charity partnerships.

Noise

APPROACH

LLA is committed to reducing the impact of aircraft noise on our neighbouring communities. Our approach combines some of the most stringent noise control measures of any UK airport with a renewed focus on transparency, innovation and collaboration.

Our updated Noise Action Plan, approved by DEFRA in 2024, sets out 50 actions designed to build on previous progress and take our efforts to the next level. Structured around the same five pillars as our earlier plan, it provides continuity while raising the bar:

- Operational procedures
- Quieter aircraft
- Operational restrictions
- Land use planning and mitigation
- Working with local communities and industry partners

Our RBS commits us to working towards the targets outlined in our Noise Action Plan, available on our website.

As in previous years, noise fines collected from breaches contribute to our Greener Future Fund, which we invest in local environmental projects.

"We strengthened our approach to community engagement even further in 2024, with eight public noise surgeries, our first-ever Airspace & Noise Week, and regular face-to-face meetings in local communities that we think are making a real difference in people's awareness of the airport's efforts to reduce noise. We've seen noise complaints significantly decrease towards the end of 2024, which shows the critical importance of listening to local people and responding transparently."

— **Nicole Prior, Head of Flight Operations**

COMMUNITY ENGAGEMENT

Engagement with our neighbours is a cornerstone of our noise strategy. In 2024, we placed a strong emphasis on face-to-face interaction, spending more time than ever in local communities alongside councillors, using portable noise monitors, and increasing opportunities for dialogue and feedback.

One of the most impactful initiatives was our series of public noise surgeries. We hosted eight in 2024 - our highest number to date - providing local residents with direct access to support, information and advice. These sessions are an essential part of our Noise Action Plan and key to helping improve community wellbeing.

We also launched our first ever Airspace and Noise Week at the airport, bringing together experts from LLA, NATS, easyJet, Luton Rising, and the Bedfordshire and Luton Community Foundation. This week-long event welcomed a diverse audience, from councillors and council officers to gliders and curious residents, with the most popular sessions covering airspace change and Luton Rising's DCO.

All this work is making a difference. Towards the end of 2024, we saw a notable reduction in noise complaints.

QUIETER AIRCRAFT

We're seeing a real shift in the types of aircraft flying in and out of LLA. The introduction of more Airbus A321neos and Boeing 737 Max - which are quieter than older models - is making a noticeable difference. We encourage operators to bring these next generation aircraft to LLA, and our incentive programme supports that transition.

Supply chain

APPROACH

Our airport's influence extends far beyond our own operations. Through our supply chain - which includes hundreds of businesses working on site or supplying us with goods and services - we have a significant opportunity to drive positive change.

A considerable share of our overall sustainability impacts, risks and opportunities lie within our supply chain. That's why we're focused on partnering with organisations that share our values and can help us deliver on our sustainability objectives. At the same time, we recognise the vital role our procurement decisions play in supporting the local economy, through both spend and the sharing of knowledge and resources.

In 2024, our procurement team was shortlisted for two major industry awards - the World Procurement Awards (Procurement Team Award) and the GO Awards (Best Procurement Delivery) - reflecting the growing strength of our work in this space.

Looking ahead, the airport is embarking on a transformation of its approach to procurement, underpinned by a new digital system. This tool will streamline how we engage the market, generate reports and manage supplier relationships, making it easier to track progress, follow up on commitments and hold suppliers to account.

FIGURE 1: TOTAL SUPPLY CHAIN SPEND

	TOTAL SPEND	LOCAL SPEND (WITHIN 20 MILES)	LOCAL SPEND (% OF TOTAL)
2024	£183,776,431	£99,465,033	54%
2023	£132,619,489	£52,149,801	39%
2022	£79,516,230	£36,931,375	46%

	TOTAL SUPPLIERS	LOCAL SUPPLIERS (WITHIN 20 MILES)	LOCAL SUPPLIERS (% OF TOTAL)
2024	1,242	284	23%
2023	895	217	24%
2022	607	143	24%

PERFORMANCE

Local procurement has many benefits, from strengthening our relationships with our community and supply chain, to helping reduce transport emissions and supporting the regional economy.

That's why we have made a commitment to keep at least 25% of LLA's total supply chain spend within a 20-mile radius of the airport. In 2024, we exceeded that target significantly, with 54% of our supply chain spend coming from suppliers within a 20-mile radius.

We also analyse local procurement using other reporting boundaries: spend within 25 mile radius of the airport, and spend within the administrative areas of Luton Borough Council, Central Bedfordshire Council, North Hertfordshire District Council, Stevenage Borough Council, St Albans District Council, Dacorum Borough Council and Aylesbury Vale District Council.

In 2024 we spent £110,210,353 with suppliers within 25 miles of the airport, 60% of our total spend.

In 2024, the top two suppliers we worked with by spend were from the local area. Firstly, the reconstruction of the car park after the fire in 2023 was awarded to BAM Construction. The second largest amount of spend by supplier went to Ryebridge Construction across several contracts, a longstanding partner (see right).

Looking ahead, we will continue to work closely with Luton Council to identify and engage businesses that align with our needs and values.

HOW WE TENDER

We are always looking for ways to make our tendering process more sustainable and locally focused.

- Our tender templates emphasise preferring local supply chains, encouraging our partners to source locally wherever possible.

- We have started asking suppliers to share information on their efforts to support local jobs, apprenticeships and recruitment - an area we'll report more on in future years.

- Our procurement requirements continue to uphold high standards on issues such as the Real Living Wage.

ENGAGING WITH OUR SUPPLY CHAIN

We want to make it easier for businesses - especially local ones - to work with us. We host regular supplier engagement days to build capacity, offer networking opportunities and encourage knowledge-sharing.

In 2024, we ran one supplier engagement day, which is fewer than usual. We're planning more of these sessions in 2025, along with our 'How to Bid for Contracts' events, and will seek feedback to evaluate where we can improve to ensure they provide real value.

Building on the foundations laid in previous years, we continue to engage our supply chain on sustainability issues through:

- Our Contractor Code of Practice and Business Ethics Policy

- Including sustainability in our contract risk register

- Embedding the Sustainable Supply Chain Charter

Together, these initiatives ensure we're not only working with the right partners but also helping to create a more resilient and sustainable supply chain that benefits everyone - from LLA and our passengers, to our community and the local Luton economy.

SPOTLIGHT ON RYEBRIDGE CONSTRUCTION

In 2024, Ryebridge Construction was added to our civil engineering framework, along with two other suppliers. A trusted local partner for over 15 years, Ryebridge shares our vision for sustainability. They are also one of the three local suppliers on our building maintenance framework and work with us on a range of contracts.

More than 90% of Ryebridge's staff are local, and they actively support the community through apprenticeships, school partnerships and a locally focused supply chain. Last year, the Ryebridge team built a new outdoor play area for pupils at Woodlands School - a great example of the kind of social value we now encourage in all new tenders.

SUPPORTING LUTON 2040 THE VISION

Air quality

APPROACH

Air quality has always been a priority for LLA. We have had management and monitoring controls in place since 2003, ensuring we track and address emissions in and around our site.

Emissions from road vehicles and aircraft - notably nitrogen dioxide (NO_2) and particulate matter (PM10 and PM2.5) - can negatively affect air quality. Areas with higher traffic volumes, such as the coach terminal, access roads and airfield apron, are particularly impacted. Occasionally, international pollution events such as Saharan dust episodes also contribute to elevated particulate levels.

NO_2, PM10 and fine particulate matter (PM2.5) are the key pollutants of concern in relation to airports, and objectives for this are set out by the UK Government. Under these objectives, local authorities must identify where pollutants are exceeding the relevant objectives and put in place measures to achieve compliance where they are being exceeded. Therefore, it is the responsibility of Luton Council to work with LLA, as a major stakeholder, to monitor and assess air quality around the airport.

Our Air Quality Strategy (AQS), introduced in 2022, is designed to further reduce emissions from airport-related traffic and aircraft, while strengthening our monitoring efforts.

We continue to take action by:

• Increasing the proportion of low- and zero-emission vehicles on-site

• Accelerating the transition to electric vehicles across operations, supply partners, staff and passengers

• Using diffusion tubes to monitor air quality at 17 locations across the airport, grouped by activity zone

• Continuously monitoring particulate matter with an EU reference equivalent monitor (in place since 2003)

• Installing 8 new continuous monitors to assess the impact of pollutants in real-time

• To ensure coaches and operational vehicles are not idling in front of the terminal.

PERFORMANCE

The annual mean PM10, monitored within the airport boundary in 2024, was 14 µgm-3. This is well within the UK's annual mean AQS objective for PM10 of 40 µgm-3 and below the World Health Organisation guideline value of 15 µgm-3.

The annual mean NO_2 concentrations measured by the diffusion tubes ranged from 6.5 to 29.3 µgm-3. After bias correction, no sites exceeded the UK annual mean NO_2 AQS objective of 40 µgm-3 in 2024.

On average, the NO_2 concentrations across all the diffusion tubes was 15.5% lower in 2024 than 2023, even though the number of passengers at the airport increased by 3.3% over the same period. Concentrations have also remained lower than pre-pandemic levels measured in 2019.

Data gathered across all LLA monitors shows that concentrations are below the relevant national long-term air quality objectives for all three pollutants.

PROGRESS

In 2024, we delivered on a key commitment by completing the installation of eight real-time continuous air quality monitors - exceeding our target of six.

The new monitors have enabled us to track air quality around the airport at a greater level of detail and frequency. They measure nitrogen dioxide (NO_2), particulate matter (PM10) and fine particulate matter (PM2.5) across one hour, 24 hour and annual means at the eight locations around the airport. This data is then monitored against the UK standards for air quality.

The improvements in this year's air quality performance are likely driven by the use of next generation, lower-emission aircraft and improvements in low-carbon surface access options for passengers and staff.

We remain focused on maintaining and improving air quality, for the benefit of both our workforce and neighbouring communities.

Image: Tennyson Road School

Image: Tennyson Road School

Image: Tennyson Road School

Biodiversity

APPROACH

At LLA, we are committed to supporting and enhancing local biodiversity, whilst managing the operational impacts of biodiversity on site.

Our new RBS commits us to develop at least three biodiversity initiatives by 2027, and we have started two so far. The first being our ongoing partnership with Marston Vale, through which we were able to donate and plant 800 trees as part of our Classroom to Careers environmental programme. We donated a further 1,000 trees to be planted at Marston Vale in 2025 with the support of LLA employee volunteers.

And second, the Greener Future Fund (GFF) is a key biodiversity programme, allowing us to better support local environmental and biodiversity projects. In 2024, we awarded £61,000 in GFF grants to seven local organisations, supporting a range of initiatives, from biodiversity-focused garden projects to environmental education programmes.

ON-SITE BIODIVERSITY

While encouraging biodiversity on site, we must also manage it carefully due to the safety risks associated with increased bird populations near aircraft.

In 2024, we focused on improving the appearance and ecological value of some of our green spaces around the estate. Over this period, we completed several landscaping projects, each one significantly improving the appearance of the estate. These projects promoted a greater respect for the local environment amongst staff, passengers and visitors and improved overall safety.

We continued to work with Luton Council and Luton Rising to explore ways to enhance the local landscape in the surrounding areas including the approaches to the airport. Through this collaboration we aim to complement some of the great work already being carried out across the LLA estate.

Landscaping highlights from 2024 include:

- 58 native silver birch trees planted
- 200kg spring flowering bulbs planted
- 180 sqm of Lonicera hedging planted
- 75 sqm of Californian lilac planted
- 6,500 sqm amenity grass sown

One of the key changes made this year was the move to Carbon4Grass aviation-specific grass seed. This seed mix has a multitude of benefits including greater resistance to drought condition, strong and deeper rooting which helps to stabilise banks, and improved tolerance to wear. It also sequesters relatively more carbon than typical grass seed mixes, helping to reduce the impact of operating the machinery used to maintain the grounds.

SOCIAL • CONNECTING WITH COMMUNITY

Our Teams

Our people are at the heart of everything we do. Whether they're delivering brilliant passenger experiences, maintaining safe and efficient operations, or driving innovation behind the scenes, our teams make LLA what it is.

We're committed to making LLA a great place to work, learn and grow - a place where everyone feels supported, inspired and empowered to succeed. That means creating an inclusive and diverse workplace culture, prioritising wellbeing and safety, and offering opportunities for meaningful development and career progression.

Our ambition is to set the standard for excellence in our sector - not just through what we deliver, but how we support the people who deliver it. By embedding ethical practices and fostering a culture of creativity, collaboration and pride, we aim to be recognised as a top-class employer within and beyond aviation.

Highlights from 2024

51%
OF NEW RECRUITS CAME FROM A LU1 TO LU7 POSTCODE

BECAME THE FIRST AIRPORT TO ACHIEVE CERTIFICATION TO ISO 45003 FOR OUR PSYCHOLOGICAL HEALTH AND SAFETY AT WORK MANAGEMENT SYSTEM

DEVELOPED A NEW WELLBEING STRATEGY

97%
OF MANAGERS COMPLETED OUR WELLBEING TRAINING FOR MANAGERS

173 APPLICATIONS FOR OUR IMPACT DEVELOPMENT PROGRAMME

+38 EMPLOYEE NET PROMOTER SCORE

73%
OF COLLEAGUES COMPLETED THE COLLEAGUE SURVEY – **OUR HIGHEST NUMBER EVER**

185
EMPLOYEES HAVE TAKEN PART IN OUR CORE SKILLS TRAINING PROGRAMME

69%
INCREASE IN SAFETY OBSERVATION REPORTING COMPARED TO 2023

SUCCESSFULLY COMPLETED OUR NEXT GENERATION SECURITY PROJECT

55
SENIOR LEADERS PARTICIPATED IN THE LEADERSHIP DEVELOPMENT PROGRAMME

RBS commitments

Commitment	Status	Progress
Achieve at least 15 accredited Mental Health First Aider (MHFA) and Safety Ambassadors across the business by 2028.	Performing	We have 114 trained MHFA's at LLA, 84 of which were trained in 2024. We also trained 24 colleagues to reach Level 2 NEBOSH H&S at Work.
Achieve Psychological Health and Safety at Work ISO 45003 certification by 2027	Performing	We achieved this certification two years early.
Implement a sustainability training programme for 100% of employees by 2027	Performing	Training programme not yet due to start.
Increase the percentage of employees using their volunteer time with the aim of achieving 25% annually by 2027.	Performing	On track. 12% of employees volunteered their time in 2024.
Work to launch apprenticeship scheme ensuring we showcase the opportunities to local people annually.	Performing	Our apprenticeship scheme is ready to launch in 2025. Additionally, we have begun planning programmes that will help support local people accessing our future early employment initiatives.
Produce an annual sustainability report that outlines progress on our Responsible Business Strategy.	Performing	We produce an annual sustainability report.
Ensure the Responsible Business Strategy is updated every three years.	Performing	We last updated the Responsible Business Strategy in 2024.

Performing
Performing as expected or exceeding targets set.

Monitoring
Behind target and requires attention. Regular monitoring and potential action required.

At risk
Off track and at risk of non-compliance. Immediate corrective action needed.

Our People

SUPPORTING
LUTON 2040
THE VISION

APPROACH

Our new RBS continues our commitment to making LLA a great place to work, learn and build a fulfilling career. Our HR team oversees a strategy focused on inclusive development - supporting core skills, nurturing talent, and strengthening leadership at every level.

LLA has robust policies and protocols in place to ensure fairness and consistency, and we are always looking to improve. For example, recent updates to our grievance and dispute policy have contributed to a notable reduction in internal issues and employment tribunal cases over the past couple of years.

Our company-wide attrition rate remains low, around 12%, which is below the market average and reflects a positive workplace culture.

Employee feedback is central to our approach to HR. We encourage engagement through regular surveys and initiatives like LLA Fest and Employee Appreciation Day, which celebrate our people and create space for connection across the business.

We also encourage you to read the Wellbeing section on page 71 to learn more about the support we offer.

RECRUITMENT

Last year, 51% of new recruits came from an LU1 to LU7 postcode, and 49% came from an LU1 to LU4 postcode. Local recruitment is core to our RBS and our strategic alignment to Luton Council's 2040 vision of a healthy, inclusive local economy.

We benchmark our pay and benefits against sector and regional peers and are confident that our strong recruitment is thanks – in part – to the excellent package we offer, particularly in security jobs.

"We recognise that developing core skills, talent and leadership within our people is fundamental to both the airport's long-term success and to create an inclusive regional economy. Our commitment to creating opportunities that are accessible to people local to build fulfilling careers is already bearing fruit, with half of our new recruits coming from local postcodes."

— Nik Jones, HR Director

Case study

BUILDING A FULFILLING CAREER: LEADERSHIP AND DEVELOPMENT PROGRAMMES

At LLA, we believe in creating an environment where everyone can grow. Our leadership and development programmes are central to this ambition - providing structured opportunities for individuals at all levels to develop their skills, expand their impact and contribute to a thriving workplace culture.

Wherever possible, these programmes are delivered at the Excellence Academy, our new dedicated learning and development hub.

LEADERSHIP DEVELOPMENT PROGRAMME

Now onto its fifth cohort, the Leadership Development Programme continues to play a vital role in shaping senior talent. In 2024, 55 senior leaders participated in the programme. With demand outstripping places, the next cohort is already oversubscribed - 14 people have been nominated for 12 available places.

In addition to structured learning, participants are encouraged to give back through our Essential Skills Workshops (see page 54). So far, 35 individuals have contributed to community-focused projects, strengthening both their leadership and our connection to the local area.

IMPACT DEVELOPMENT PROGRAMME

Launched in 2023, the Impact Development Programme is designed to uncover and support high-potential individuals and future leaders from across LLA.

The programme is inclusive by design: participants self-nominate, and uptake has been strong. So far, we've received 173 applications, and four cohorts have already begun the nine-month journey (with a fifth due to launch in 2025). Each cohort includes 12 participants, with a strong representation of women (40%), aligning with our ED&I priorities.

The programme features three core modules - behaviours, performance, and mindset/relationships - delivered over six days, plus two additional days for graduation and cross-functional networking. Each participant develops a personal project to drive change within LLA, pitching it 'Dragons' Den'-style for potential executive sponsorship.

In 2024, the Impact Development Programme kicked off in February, with participants getting together for a morning to find out more about their upcoming development journey and hear from members of the senior management team and some brilliant guest speakers.

CORE SKILLS TRAINING PROGRAMME

Our Core Skills Training Programme is open to all employees who want to build their leadership potential. It offers a suite of eight half-day courses focused on practical workplace skills such as presentation and communication.

Participation is via self-nomination, and demand has been high: 185 employees have taken at least one course so far.

We will be expanding this programme further, with plans to recruit a dedicated Learning and Development professional to support delivery. We're also exploring new training content, such as marginal gains, in response to ongoing demand and evolving workplace needs.

EMPLOYEE ENGAGEMENT

At LLA, we want our people to feel genuinely connected to our vision, to one another, and to the work we do every day. That's why employee engagement remains a central priority across the organisation. With a diverse range of roles operating throughout the airport, we use a variety of tools to ensure everyone has the opportunity to feel heard, valued and part of our journey.

Now in its third year, our colleague survey continues to be one of the most important ways we gather insight into what matters most to our people. In 2024, participation reached a new high with 73% of colleagues completing the survey, up from 70% in 2022 and 61.5% in 2021. This upward trend signals increasing trust in the process and confidence that participation leads to action.

We also measure our Employer Net Promoter Score (eNPS), which gauges how likely colleagues are to recommend LLA as a place to work. This year, we scored +38, significantly above the industry benchmark of +12. This places us in the top three companies in our sector, out of 147 organisations measured.

WORKPLACE HARASSMENT

LLA takes a proactive stance on workplace safety and respect. Ahead of legislative changes in October 2024, we implemented a comprehensive new Harassment Policy that includes greater detail on all the potential forms of harassment. The policy also addresses harassment from third parties, including customers.

We provided training to more than 100 managers on the new policy as part of the launch.

Next up, we will extend training and awareness campaigns to all employees. LLA is already being recognised as a leader in this area, with other organisations reaching out to learn from our approach.

Highlights included:

- **Inspired by the vision at LLA: 7.7 (Benchmark 7)**
- **Engagement at LLA: 7.9 (Benchmark 7.7)**
- **People of all backgrounds can succeed at LLA: 7.8 (Benchmark 7.6)**
- **Enthusiastic about role at LLA: 7.7 (Benchmark 7.2)**
- **Desire to stay at LLA: 8.3 (Benchmark 7.9)**
- **Sense of pride at LLA: 8.3 (Benchmark 7.8)**
- **Understanding one's role in achieving the vision: 8.3 (Benchmark 7.6)**

These results reflect the strength of our workplace culture and the pride our people feel in being part of LLA. Areas that received particularly positive feedback included leadership visibility, the benefits package, and opportunities for development.

We are committed to transparency: survey results are shared openly with colleagues, alongside clear plans of action in response. As we did last year, we're continuing to implement targeted interventions based on feedback, ensuring we stay accountable and responsive.

In 2024, we also hosted two Town Hall events with our Executive Leadership Team. These sessions provide a safe and open space for colleagues to ask questions, share concerns and hear directly from leadership on key topics. The sessions were well attended and well received, strengthening trust and reinforcing our values of openness and inclusion.

EQUALITY, DIVERSITY AND INCLUSION

At LLA, we are committed to fostering a workplace where everyone feels respected, included and able to thrive. In 2024, we launched a new ED&I page on the LLA Hub, designed as a one-stop shop for content related to inclusion and accessibility.

Alongside this, we published our 2025 ED&I calendar, helping colleagues stay informed about key cultural and community events.

In 2024, we also continued to embed ED&I into everyday practice - from inclusive recruitment strategies to awareness campaigns. As part of this, PRIDE Month was a highlight, with colleagues encouraged to share their stories, helping to build empathy and strengthen our culture of inclusion.

FOCUS FOR 2025

Looking ahead, we're focused on improving the overall employee experience. This will include procuring a new HR system to give employees easier access to information about, for example, their benefits, as well as streamline processes and reduce paperwork and admin time.

We are also looking to keep expanding our in-house expertise with new team members trained in Neuro-Linguistic Programming (NLP), further enhancing our mature approach to Occupational Health. These resources are available to everyone at LLA.

REWARD, RECOGNITION AND BENEFITS

We are dedicated to fostering a healthy, inclusive and supportive environment for all employees - both inside and outside the workplace. Workplace flexibility and benefits are key to this, as are competitive pay, private medical coverage, pension contributions, and value-aligned perks such as EV salary-sacrifice and cycle to work schemes.

We believe in recognising and celebrating our people in meaningful ways. From Employee Appreciation Day and our Christmas shopping vouchers to weekly newsletter shout-outs and accompanying gift vouchers, recognition is part of our everyday culture. We also like to share our successes with our people, with rewards such as our generous profit-sharing scheme and an ASQ programme that thanks staff for maintaining high levels of guest experience.

Our pension scheme is managed through Scottish Widows, who take a responsible approach to investment and conduct research into customers' views and priorities on ESG matters.

FAIR PAY

We are proud to be an accredited **Real Living Wage Employer**, a status we maintain through the Living Wage Foundation, ensuring that all staff receive a wage that reflects the real cost of living.

In 2024, we agreed a 4.5% pay increase through union negotiations, and expanded eligibility for our profit-share scheme. Additionally, our ASQ bonus scheme continues to recognise collective achievement when performance targets are met.

Last year, we made our profit-share scheme more inclusive - new joiners now start accruing from day one, rather than waiting two years. The generous scheme is open to all permanent and directly employed staff, so success is shared fairly across the business.

LLA FEST

In 2024, we held our first all-employee social event in well over a decade. LLA Fest was organised by the reward and recognition team and hosted locally at Luton Rugby Club. This post-summer thank you to staff was fully funded by LLA and open to employees and their families.

Around 400 people joined in the celebrations, and it was brilliant to see everyone mingling across the whole business. The event received positive feedback across the board, with everyone who gave feedback saying they would attend a future event and that it was nice to all get together.

EV SALARY SACRIFICE SCHEME

In response to employee feedback from the 2023 colleague survey, LLA launched a brand-new EV Salary Sacrifice Scheme in partnership with Octopus Electric Vehicles. Over 40 employees signed up to the scheme in 2024, from all areas of the business, which is estimated to have saved over 44 tonnes of carbon in the first year. The scheme is open and accessible to all permanent staff, regardless of credit score and requires no cash deposits – giving easier access to electric vehicles to all.

Wellbeing

APPROACH

At LLA, ensuring the psychological safety and wellbeing of our people remains a top priority, not least because it ensures the ongoing success of our airport. In our new RBS, we commit to striving to be the employer of choice for current and future employees, with a reputation for diversity and inclusivity.

PERFORMANCE

Another year of progress to feel proud of with our continued commitment to improving psychological safety and wellbeing across the business.

In 2024, our focus areas included developing a new Wellbeing Strategy, continuing the rollout of wellbeing training for managers - including training on wellbeing risk assessments - and implementing our Wellbeing Awareness Plan. We also trained 84 Mental Health First Aiders and 24 Safety Ambassadors in 2024, achieving our target of 15 new recruits per year.

Similarly, our commitment to employee volunteering is helping foster an environment of care and giving back, within and around our LLA community. In 2024, 12% of the LLA workforce gave their time to causes they care about - see more in the Our Community section on page 50.

All this hard work is continuing to show real results. In 2024, not only did we become the first airport to achieve certification to ISO 45003 for our Psychological Health and Safety at Work management system (see the case study), we also saw encouraging trends in the mental health of our workforce. A year-on-year comparison between 2023 and 2024 absence data shows:

- **Mental health days lost reduced by 44% (despite 17.4% increase in headcount)**

- **Mental health-related absence spells increased by 54%**

This suggests that employees are increasingly able to take a break when they need it, and that employees feel more comfortable returning to work sooner after a mental health absence and are more willing to report mental health-related absences openly.

Case study

bsi ISO 45003 Psychological Health and Safety at Work CERTIFIED

WELLBEING AWARDS AND CERTIFICATION

In 2024, we became the first airport in the world to achieve ISO 45003 for Psychological Health and Safety Management. Achieving certification three years ahead of our 2027 target reflects the dedication and maturity of our approach.

We received outstanding feedback from the audit team, with no findings or recommendations for improvement. The BSI said our comprehensive data gave us insights that made the impact of wellbeing truly tangible.

Our achievement was recognised across our industry. The health, safety and wellbeing team was Highly Commended in the Wellbeing Strategy of the Year category at the IIRSM Risk Excellence Awards. Judges praised us for "embracing a profound commitment to fostering an open and transparent wellbeing culture, elevating psychological safety to the same level of importance as physical health and safety."

Meanwhile, our Health and Wellbeing Lead, Sam Cartwright, won three awards, including the SHP Rising Star Award, the Most Inspiring Wellbeing Employee of the Year at the Great British Workplace Wellbeing Awards - as well as the coveted Wellbeing Hero of the Year.

These accolades reflect the people and strategy driving our wellbeing culture, which ensures psychological safety is taken seriously throughout our business.

NEW FIVE-YEAR HEALTH AND WELLBEING STRATEGY

Last year, we developed a new five-year Health and Wellbeing Strategy, setting our direction from 2024 through to 2029. Created in collaboration with our sustainability and HR teams, the strategy was presented to and endorsed by our Executive Team.

The new strategy is built around six key pillars, each aimed at improving the physical and psychological wellbeing of our people. To keep momentum and focus, we've developed a detailed annual action plan for each year of the strategy.

To ensure the strategy delivers real, lasting impact, we've also defined what we want to see, hear and feel across the business as a sign of successful implementation. And we're tracking a range of wellbeing metrics to measure progress, including:

• Absence data

• Occupational health insights

• Outputs from our wellbeing risk assessments, aligned to key workplace stressors

• Results from our annual engagement survey, with specific wellbeing-related questions and year-on-year comparisons

The strategy builds on the strong foundations laid over recent years, including targeted training, early intervention, and an increasingly open culture around mental health and wellbeing. It reflects our long-term commitment to making LLA a place where people feel supported, valued and able to thrive.

WELLBEING TRAINING

Supporting wellbeing starts with confident, informed leadership. That's why manager training has been a major focus of our wellbeing work, with fantastic results.

As of January 2025, 142 out of 146 managers had completed our Wellbeing Training for Managers, achieving a 97.2% completion rate, exceeding our target of 95%. Feedback on the in-house sessions has been overwhelmingly positive: 100% of participants rated the training as 'extremely useful'.

In 2024, we made our course content even more practical and relevant with the launch of in-house wellbeing training that's specific to LLA's policies, roles and responsibilities.

Key elements of our wellbeing training programme include:

• **Wellbeing risk assessments:** Managers and leaders are now empowered to lead these themselves, instead of relying on the health, safety and wellbeing team.

• **Wellbeing conversations:** Managers are trained in how to hold supportive, proactive conversations around mental health and wellbeing.

• **Ongoing learning:** We have a rolling approach to ensure new managers are trained as they become business leaders.

All this training is closely aligned with our broader leadership development work, therefore complementing other programmes across the organisation. Together, these efforts ensure that leaders across the LLA ecosystem have the skills, knowledge and understanding they need to foster a culture where wellbeing is prioritised and people can thrive.

WELLBEING AWARENESS PLAN

In 2024, we launched a new Wellbeing Awareness Plan (WAP) to communicate wellbeing issues across LLA.

The plan introduces monthly focus topics, shaped by insights from employee surveys and trends identified by our MHFAs. For each month's theme, we share resources and signposting via the wellbeing hub and wellbeing emails.

Highlights from 2024 include:

• **Our #Let'sTalk campaign, which featured weekly interviews with LLAers sharing their personal wellbeing experiences, helping to normalise open conversations across the business.**

• **Increased visibility of employee benefits through My Benefits month, including promotion of our Private Medical Insurance Scheme.**

• **The Move More Autumn Challenge, delivered jointly with Luton Council, which encouraged healthier and more sustainable travel - supporting both employee wellbeing and Luton's ambition to be a carbon-neutral town by 2040.**

Wellbeing Awareness Plan 2024 — one team

January Let's Talk Campaign	February Let's Talk Campaign	March Let's Talk Campaign	April Stress Awareness
May My Benefits	June Diversity, Equality & Inclusion	July Recognition	August Giving Back
September Mental Health Awareness	October Women's Health Awareness	November Men's Health Awareness	December Disability Awareness

Events with Helen this Mental Health Awareness Month

Wellbeing Brunch & Meet Helen
Thurs 12th Sept - Security Break Room - 12-1pm

Surviving to Thriving workshop
Weds 25th Sept - Room Delta, Percival House - 1-1.45pm
This session raises awareness about mental health in the workplace, focusing on the common stressors of workplace relationships and the demands of modern work environments. Gain practical strategies for managing stress, improving communication, and fostering a healthier work-life balance.

1-1 Wellbeing Check-ins
Fri 27th Sept - 10am-1pm - Prayer Room office or virtual

FOCUS FOR 2025

In 2025, we will focus on embedding and fine-tuning new wellbeing processes - ensuring they're effective and making improvements where needed. We'll also continue delivering our Health and Wellbeing Strategy, while maintaining our ISO 45003 certification.

Wellbeing is now a core part of LLA's culture, supported by senior leadership, recognised externally, and reflected in the growing range of initiatives we offer. This year is about consolidating progress and continuing to build a workplace where everyone feels supported.

Health & safety

APPROACH

We are committed to fostering the best possible safety culture - one in which our colleagues feel empowered to consistently make the right choices, take accountability for their safety and that of others, and collaborate openly by sharing information to maintain a secure working environment.

Our ongoing commitment is demonstrated by maintaining our certification to ISO 45001 and 45003. We monitor performance metrics across health and safety monthly, with our health and safety team reporting into LLA's overall risk governance structure.

SAFETY METRICS

We achieved all our health and safety targets in 2024. Notably, we recorded a 69% increase in safety observation reporting compared to 2023, reflecting greater vigilance and proactive engagement from colleagues. Lost Time Injury Frequency Rates (LTIFR) decreased by 6.7% year-on-year, and employee accidents reduced by 13% despite a significant headcount increase of 17.6%. While third-party accidents reduced by 2.7% and public accidents increased by 13%, 97.5% of all accidents were classified as level one, representing low risk. There were no fatalities.

PERFORMANCE

In 2024, we worked hard to improve our approach to risk management. This work included training 24 colleagues in NEBOSH H&S at Work, implementing new enterprise risk management software and the provision of NEBOSH-certified training in risk management and assessment to 18 colleagues across our departments. In collaboration with security, we established an inclusive, gold-standard approach to risk assessment, scheduled for company-wide implementation in 2025.

Last year, we also collaborated with the guest experience and security teams, as well as other airport stakeholders, to address a consistent rise in disruptive passenger incidents. The guest experience team rolled out conflict management training for public-facing LLA teams and third-party airport stakeholder partners.

In 2024, our health and safety department alone delivered 2,989 hours of dedicated training.

We incorporated Building Safety Act legislative requirements into our construction management procedures and facilitated awareness training for key stakeholders and contractors.

We were also proud to have our efforts recognised in the achievement of a Silver RoSPA award, demonstrating our unwavering commitment to keeping employees, customers and passengers safe from accidental harm and injury.

TRIM PROCEDURE UPDATES

We maintain a team of trauma risk management (TRIM) practitioners, supported by three TRIM managers. In 2024, following a thorough review by our health, safety and wellbeing team, we published significant improvements to our TRIM procedure, enhancing our trauma risk management effectiveness. We also developed the TRIM hub on our intranet, featuring detailed video guidance including managerial responsibilities and resources for trained practitioners.

SAFETY CULTURE SURVEY

In 2024, we initiated a safety culture maturity assessment pilot with Safe365, encompassing four departments. The assessment indicated a proactive maturity level, and plans are underway to expand this survey to additional departments, supporting continual cultural improvement across the business.

HEALTH, SAFETY & WELLBEING WEEK

Our annual Health, Safety & Wellbeing Week featured diverse and engaging sessions, including occupational health checks, first aid training (facilitated by the fire service), sleep prioritisation workshops, interactive sessions led by physiotherapists, mental health optimisation activities, and virtual reality hazard spotting exercises.

AIRSIDE OPERATIONS AND THE SAFETY STACK

Airside operations maintain a robust safety management system to guarantee the safe operation of aircraft at LLA. Safety remains integral to our culture and collaborative efforts with airside partners to proactively manage risks. Last year's Civil Aviation Authority (CAA) compliance audit yielded no findings, reflecting our rigorous standards.

The LTN Safety Stack has been in operation since 2017 and represents a highly effective collaborative relationship among airside operators, fostering effective information exchange and best practice sharing. This partnership approach continues to yield substantial safety and operational benefits, including successful initiatives like equipment pooling and the safety leader scheme.

EMBEDDING A JUST CULTURE

We believe that a Just and Fair Culture allows for continuous learning and the open sharing of safety related information and continue to embed the Just Culture approach across the wider business. Through this we aim to ensure that colleagues are encouraged and empowered to confidently speak up and report near misses and hazards without fear and ensure a fair and balanced response to incidents.

Security

APPROACH

Our security team represents the largest employee group at LLA and is dedicated to providing an exceptional guest experience while ensuring the highest standards in safety and security. We prioritise the wellbeing of our security team and are currently developing a new professional development and leadership training strategy to further empower our colleagues.

NEXT GENERATION SECURITY UPGRADE

In 2024, we successfully completed our next generation security project, significantly enhancing the guest experience with more spacious security lanes, and faster, more efficient scanning technology.

As one of the first major airports in the UK to fully implement these next generation upgrades, passengers can now pass through security without needing to remove liquids and electronic devices from their bags, dramatically improving processing speeds and overall satisfaction. There has been a noticeable increase in guest experience scores for security.

This £20 million refurbishment project has also seen aesthetic improvements, including new flooring and ceilings, creating a more pleasant environment for both passengers and our employees.

FOCUS FOR 2025

Looking ahead, our priorities include maintaining our ISO 45001 and 45003 accreditations whilst ensuring continuous improvement in our health, safety and wellbeing management systems. We will also continue our Safety Culture Maturity assessment programme and set departmental strategic improvement plans and objectives to feed into our overall 2025 Health, Safety and Wellbeing Strategy.

Sustainability Governance

We prioritise efficient resource utilisation, adaptability and attracting talented individuals to drive our sustainability agenda. Our Responsible Business Strategy (RBS) is deeply integrated into our daily operations, with each department responsible for delivering key sustainability actions, supported by our central Sustainability team.

The Sustainability Board Committee provides strategic oversight and ensures accountability for achieving our sustainability objectives. In 2024, we launched our new Responsible Business Strategy covering the period from 2024 to 2027. This refreshed strategy outlines our ambitious goals and highlights the critical sustainability commitments we will pursue over the next three years, reinforcing our dedication to continuous improvement and meaningful impact.

There's more information on our new RBS on page 86, or you can download it on our website **https://www.london-luton.co.uk/corporate/sustainability/responsible-business-strategy**.

Accountability, governance structure & policies

ACCOUNTABILITY

Transparency and accountability underpin everything we do at LLA, guiding our decision-making and reinforcing our commitments to stakeholders and the community. Our comprehensive approach ensures we meet the highest standards of governance, risk management and ethical conduct, reflecting our values as a responsible business.

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, our majority shareholder. It comprises representatives from LLA (CEO, CFO, Director of Corporate Affairs, Chief Operations Officer (COO), General Counsel and Head of Sustainability) and from shareholders Aena and InfraBridge.

In addition, we run quarterly meetings with Luton Council and Luton Rising, the airport freeholder, on the long-term sustainability of the airport, with Luton Rising's Managing Director, and LLA's CEO, Head of Sustainability and Director of Corporate Affairs.

We have a central Sustainability team, which is directly responsible for our social impact and environmental programmes. The team supports 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.

"Our sector operates within a complex landscape of regulations. At London Luton Airport, we strive to foster a culture of transparency and accountability to support our compliance framework. Integrating our principles into our operations helps us to cultivate trust among stakeholders as well as supporting compliance."

— **Mee-Ling Skeffington, General Counsel**

GOVERNANCE AND REPORTING

Our governance structure is designed to oversee our approach to responsible business practices.

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 the Global Reporting Initiative (GRI) and sector supplement guidance.

The governance structure is as follows:

• CEO

• Sustainability Board Committee

• Executive Leadership Team

• Senior Management Team

• Risk Committee

• Team meetings

POLICIES

The RBS 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 Strategy and Travel Plan, new in 2024

2. Sustainability, Energy and Environment Policies, introduced in 2023

3. Energy Plan, refreshed in 2023

4. Environmental Management Plan, refreshed in 2023

5. Noise Action Plan, new in 2024

6. Equality, Diversity and Inclusion Strategy, refreshed in 2022

7. Health, Safety and Wellbeing Strategy, refreshed in 2024

8. Passenger Satisfaction Strategy, launched in 2019

9. Employee Engagement and Communications Strategy, launched in 2019

10. Hybrid Working Policy, launched in 2021

GRESB

In 2024, for the third year running, LLA received the 'Sector Leader' title for sustainability governance and disclosure, scoring a perfect 100/100 score and achieving a five-star rating for our management and performance on Environment, Social and Governance (ESG) matters in the Global Real Estate Sustainability Benchmark (GRESB) assessment.

GRESB is an independent, international sustainability framework that globally benchmarks major organisations and assets on their ESG management, with sector leaders being identified as the top-performing organisations by sector, region and nature of ownership.

This achievement shows strong governance, management and performance on ESG material issues, which is an essential component of how we deliver strong progress in reducing our environmental impact while accelerating positive impacts within our community and local economy, and delivering a simple, safe and friendly passenger experience.

Supported by our shareholders Aena and InfraBridge, this achievement positions us a sector leader in sustainability management.

"We work closely with London Luton Airport to drive and deliver strong ESG management and performance, demonstrated by their sector-leading GRESB assessments with maximum scores and five-star ratings for three consecutive years. This strong governance foundation enables us to support LLA to manage sustainability issues effectively as they grow."

— **Graeme Ferguson, Head of Airports Europe, InfraBridge**
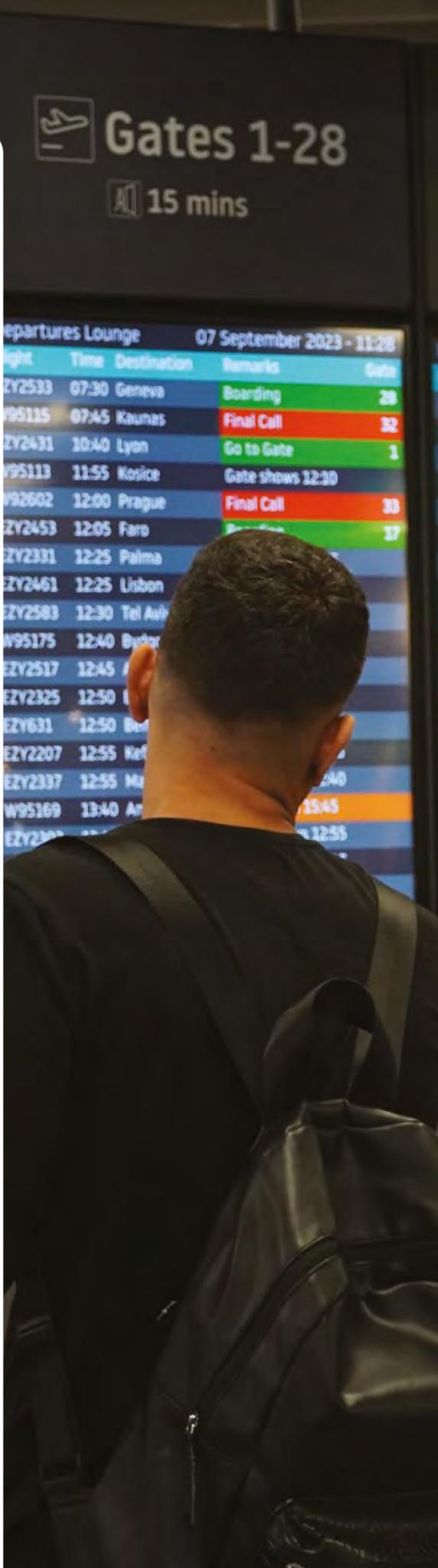
Industry alignment

LLA actively engages with leading aviation industry bodies, both contributing to and aligning with their guidance to enhance sustainability and environmental performance across the sector.

Our key partnerships include:

• **Sustainable Aviation:** A UK coalition committed to achieving Net Zero emissions. Our involvement helps shape and implement industry-wide sustainability strategies.

• **Airports Council International (ACI):** We follow ACI's international standards and sustainability best practices, benefiting from global expertise and collaborative innovation.

• **Airports UK:** LLA is a member of this association representing the interest of UK airports with an aim to influence and work with government and decision-makers on areas related to security, economic development, safety and environmental sustainability.

• **Jet Zero Council:** LLA supports this UK Government initiative focused on achieving zero-emission aviation, actively participating in the adoption of groundbreaking decarbonisation technologies.

• **Connected Places Catapult (CPC):** Through programmes launched by CPC such as the Zero Emission Flight Infrastructure programme, LLA contributes to the research and development of infrastructure for future hydrogen and electric aircraft.

By engaging with these industry groups, LLA plays an integral role in making a contribution to the sector-wide response to climate change, ensuring we are well-positioned to adopt industry advancements and meet future environmental challenges.

OPTIMISE AI DIGITAL TWIN

We partnered with Optimise AI through the Connected Places Catapult innovation accelerator to develop an advanced AI-assisted digital twin designed to reduce energy use and carbon emissions at the airport. The digital twin can monitor real-time energy consumption against predictions, benchmark our performance against similar facilities, and simulate different energy-saving interventions.

Finance

This year, LLA delivered a strong financial performance, achieving our most profitable year to date. Our financial position remains secure, highlighted by our fully funded pension scheme.

The finance team structure has evolved positively, now encompassing diverse expertise and clearly defined roles. We've introduced new entry-level positions, investing significantly in training and professional development. Local recruitment has naturally supported the airport's community-focused approach.

"2024 was a very successful year for London Luton Airport. We delivered record financial results, plus we expanded our capacity to 19 million passengers per year, providing a platform for further growth in the coming years. We also took important steps along our Net Zero pathway, gaining the green light for our planned on-site solar farm, and continuing our transition to low-carbon vehicles."

— **Richard McCord, Chief Financial Officer**

IT and cybersecurity

APPROACH

At LLA, safeguarding personal and sensitive information is paramount. We operate robust procedures to secure sensitive data and protect our network against cyber and physical threats. Clear data protection and information security policies are in place, with a dedicated Data Protection Officer service appointed to support compliance with the UK Data Protection Act 2018 (DPA 2018) and the EU General Data Protection Regulations (GDPR). We minimise the volume of sensitive information we store, limiting access to restricted systems and data.

Our secure network infrastructure includes company-wide Virtual Private Networks (VPNs) and stringent access controls. We regularly monitor and test the security of critical IT systems and networks. Employees participate in mandatory annual information security training via our e-learning platform. Additionally, we collaborate closely with Aena, our primary shareholder, on cybersecurity initiatives and are actively working towards ISO 27001 compliance for information security management.

Project updates

In the past year, we've delivered several important IT projects, including a new check-in and boarding system, improved Wi-Fi access, and enhanced mobile phone signals throughout the airport. These developments directly support our airlines, retailers, ground handlers and passengers.

We've also focused on more collaboration across departments, breaking down silos and fostering approachable, productive partnerships. Notably, we worked closely with the security team to successfully implement the next generation security screening system. We conduct quarterly Information Security forums, led by our CFO, ensuring continuous oversight and improvement in information security matters.

Cybersecurity

Strengthening our cyber resilience remains a priority, especially as cybersecurity concerns grow for critical national infrastructure like airports. Our IT team has developed an advanced cybersecurity programme, incorporating robust tools, defined processes and clear governance structures to safeguard our networks. Our approach to cybersecurity oversight is continuously updated and we maintain an Information Security Management System (ISMS) framework which supports all applicable elements of the CAA's CAP1753 cybersecurity standard.

We maintain rigorous internal cybersecurity measures and undergo regular audits by both Aena and the CAA, achieving accreditation (CAA Cyb019). Additionally, LLA achieved the highest airport cybersecurity score in a recent BitSight Cybersecurity Report.

Building our team

We've significantly expanded our IT team over the last year and improved our internal structure, ensuring each team member has clear development plans. This positions us to effectively support various departments and partners, including ground handlers, airlines and retailers, reinforcing our resilience and capacity to support the airport's continued growth.

FOCUS FOR 2025

Looking ahead, we are planning a major IT infrastructure upgrade to provide more reliable, more efficient and less energy-intensive services. We will enhance internal communications across all teams, focusing on raising awareness of cyber risks through targeted monthly initiatives covering key topics like phishing awareness and password security.

Government engagement

APPROACH

We actively engage with national and local government, providing input through various forums, consultations and by maintaining an open dialogue with MPs, Ministers, Government Advisors and Local Councillors.

This includes supporting strategic priorities such as the Oxford-Cambridge Arc, and contributing to discussions on the future of aviation, infrastructure and regional development. Through this engagement, we aim to ensure that LLA continues to play a vital role in delivering growth for the region and the UK.

"Strong ESG governance isn't just about ticking boxes - it's about creating real impact, something London Luton Airport consistently demonstrates through its forward-thinking approach. As major shareholder, we value how LLA's dedication to responsible management accelerates our shared commitment to deliver better environmental and social management practices for LLA's partners, passengers and communities. Everybody associated with LLA should feel extremely proud of the contribution they have made to the airport's approach to environmental management and social initiatives."

— **Amparo Brea Álvarez, Innovation, Sustainability and Customer Experience Director and Chief Green Officer, Aena**

Climate adaptation and climate change

LLA recognises the need to identify and embed climate change adaptation within the airport's strategic business planning. The physical impacts of climate change, such as surface water floods, rising temperatures, and irregular weather events, as well as the transition to a lower-carbon economy present both risks and opportunities to the airport. These need to be assessed through integration into existing LLA risk governance processes and adapted to, or mitigated against, where required.

The Government holds the reporting powers to request major national infrastructure operators to report on how they manage climate risk. Reports are expected to address the current and future projected impacts of climate change on their organisation, proposals for adapting to climate change, and an assessment of progress. This is known as the Adaptation Reporting Power (ARP).

We submitted our last climate resilience plan and climate change adaptation report in 2021. Last year, the Government requested its fourth round of the adaptation reporting process – known as ARP4.

In response, we submitted our updated climate change adaptation and resilience framework, which includes a full risk assessment and adaptation planning, as well as financial disclosure about the risks of climate change on the airport and its operation.

This report is now public. The updates include progress we've made on climate change adaptation, as well as an update to our climate risk. Since 2021 (our last report submission), extreme heat led to a significant delamination in the runway pavement and we experienced several flooding incidents. These are highlighted as case studies in the report, and we've identified what we will do to rectify future incidents.

Supporting data and information

Environment, Social and Governance Performance Data

This section sets out the detailed metrics related to the Environmental, Social and Governance performance of the airport.

We have disclosed performance metrics for:

- 2024 (this reporting year),
- 2023 (the first full year when the airport operated without restrictions following COVID)
- 2019 (which is our baseline for many metrics and a peak year for passenger numbers and operations).

Since 2019, LLA has continued to evolve its reporting in line with industry best practice and changes in sustainability reporting frameworks, commencing disclosure when additional metrics were introduced.

Data Code	KPI	Units	2019	2023	2024
Scope 1 Emissions					
E-CRB-1	**Total Scope 1 Emissions**	**tCO$_2$e**	**2,966**	**2,486**	**1,920**
E-CRB-1.1	Mobile Sources - Vehicles	tCO$_2$e	1,137	801	423
E-CRB-1.2	Stationary Sources - Generators & Heating	tCO$_2$e	203	158	149
E-CRB-1.3	Stationary Sources - Natural Gas Heating & Boilers	tCO$_2$e	1,562	1,393	1,306
E-CRB-1.4	Stationary Sources - Fire Training	tCO$_2$e	8	5	10
E-CRB-1.5	Process Emissions - Refrigerants	tCO$_2$e	55	103	8
E-CRB-1.6	Process Emissions - Ground De-Icing	tCO$_2$e	-	25	23
Scope 2 Emissions					
E-CRB-2	**Total Scope 2 Emissions (Location Based)**	**tCO$_2$e**	**4,981**	**4,091**	**3,844**
E-CRB-2.1	Electricity - LLAOL Use - Location Based	tCO$_2$e	4,981	4,091	3,844
E-CRB-2.2	Electricity - LLAOL Use - Market Based	tCO$_2$e	6,772	0	0
Scope 3 Emissions					
E-CRB-3	**Total Scope 3 Emissions (Location Based)**	**tCO$_2$e**	**1,260,951**	**1,199,668**	**1,216,151**
E-CRB-3.1	**Category 1 - Purchased Goods and Services Total**	**tCO$_2$e**	**46**	**24,097**	**17,074**
E-CRB-3.1.1	C1 - Purchased Goods and Services and Category 2 Capital Goods	tCO$_2$e	-	23,578	16,659
E-CRB-3.1.2	C1 - Water Consumption	tCO$_2$e	46	21	21
E-CRB-3.1.3	C1 - Non-road construction Vehicles	tCO$_2$e	-	497	394
E-CRB-3.3	**Category 3 - Fuel and Energy related Activites Total**	**tCO$_2$e**	**790**	**1,831**	**1,720**
E-CRB-3.3.1	C3 - WTT & T&D of Scope 1 and 2 Energy	tCO$_2$e	790	1,831	1,720
E-CRB-3.5	**Category 5 - Waste generated in Operations Total**	**tCO$_2$e**	**140**	**2,658**	**39**
E-CRB-3.5.1	C5 - Waste	tCO$_2$e	50	2,635	15

Data Code	KPI	Units	2019	2023	2024
Scope 3 Emissions					
E-CRB-3.5.2	C5 - Wastewater	tCO$_2$e	90	23	24
E-CRB-3.6	**Category 6 - Business Travel Total**	**tCO$_2$e**	**103**	**68**	**178**
E-CRB-3.6.1	C6 - Business Travel	tCO$_2$e	103	68	178
E-CRB-3.7	**Category 7 - Employee Commute and Home working**	**tCO$_2$e**	**1,010**	**1,648**	**1,251**
E-CRB-3.7.1	C7 - Staff Commute	tCO$_2$e	1,010	1,648	1,251
E-CRB-3.11	**Category 11 - Use of Sold Products Total**	**tCO$_2$e**	**1,254,538**	**1,165,963**	**1,192,076**
E-CRB-3.11.1	C11 - Aircraft LTO and APU	tCO$_2$e	188,267	159,030	158,448
E-CRB-3.11.2	C11 - Aircraft CCD	tCO$_2$e	930,561	873,200	883,875
E-CRB-3.11.4	C11 - Aircraft Engine Testing	tCO$_2$e	608	2,157	2,282
E-CRB-3.11.5	C11 - Third Party Operational Vehicles & GSE	tCO$_2$e	3,179	3,661	3,625
E-CRB-3.11.6	C11 - Aircraft De-Icing	tCO$_2$e	-	502	372
E-CRB-3.11.7	C11 - Passenger Surface Access	tCO$_2$e	131,923	127,411	120,046
E-CRB-3.11.8	C11 - Tenant Staff Commute	tCO$_2$e	-	-	8,985
E-CRB-3.11.9	C11 - Landside Cargo Transport	tCO$_2$e	-	-	14,443
E-CRB-3.12	**Category 12 - End of Life treatment of sold products Total**	**tCO$_2$e**	**-**	**-**	**193**
E-CRB-3.12.1	C12 - MSCP Decomissioning	tCO$_2$e	-	-	193
E-CRB-3.13	**Category 13 - Downstream leased assets Total (Location Based)**	**tCO$_2$e**	**4,325**	**3,404**	**3,621**
E-CRB-3.13.1	C13 - Third Party Grid Electricity (Location Based)	tCO$_2$e	4,325	3,404	3,621
E-CRB-3.13.2	C13 - Third Party Grid Electricity (Market Based)	tCO$_2$e	5,880	-	-
Outside of Scope					
E-CRB-4.1	WTT of Aviation Emissions	tCO$_2$e	-	214,930	217,031

Data Code	KPI	Units	2019	2023	2024
Outside of Scope					
E-CRB-4.2	WTT & T&D of Scope 3 Electricity	tCO$_2$e	4,325	3,404	3,621
E-CRB-4.3	Biofuel outside of scope	tCO$_2$e	-	-	457
Total Emissions					
E-CRB-5	Total Scope 1,2&3 (Location Based)	tCO$_2$e	1,268,898	1,206,244	1,221,915
Energy					
E-ENR-1	**Total Energy**	**MWH**	**33,062**	**31,325**	**29,757**
E-ENR-2	Mobile Sources - Vehicles - HVO	MWH	0	-	1,760
E-ENR-3	Mobile Sources - Diesel	MWH	4,317	3,306	1,640
E-ENR-4	Stationary Sources - HVO	MWH	0	0	31
E-ENR-5	Stationary Sources - Diesel	MWH	693	623	504
E-ENR-6	Stationary Sources - Oil	MWH	-	-	76
E-ENR-7	Stationary Sources - Natural Gas	MWH	8,495	7,617	7,142
E-ENR-8	Stationary Sources - Fire Training	MWH	69	23	41
E-ENR-9	Electricity - LLAOL Use	MWH	19,488	19,756	18,564
E-ENR-11	Total Energy - Stationary Sources	MWH	9,257	8,263	7,794
E-ENR-12	Total Energy - Mobile Sources	MWH	4,317	3,306	3,400
E-ENR-10	Intensity - Energy Per PAX	kwh/PAX	1.84	1.93	1.78
Refrigerant					
E-REF-1	Process Emissions - Refrigerant Losses	kg	27	62	7
Ground De-Icing					
E -GDI-2	Ground Airport De-Icing Fluid	litres	-	22,606	20,574
Net Zero Progress					
E-NZO-1	Percentage decarbonisation against 2019 baseline	%	-	17%	28%
E-NZO-2	Proportion of Electricity sourced from on-site renewables	%	-	-	-
E-NZO-3	Proportion of low-carbon LLAOL operational vehicles	%	-	23%	88%
E-NZO-4	Proportion of low-carbon LLAOL operated buses	%	-	-	100%
E-NZO-5	Proportion of low-carbon heating	%	-	-	-

Data Code	KPI	Units	2019	2023	2024
Net Zero Progress					
E-NZO-6	Proportion of LED in LLA operated buildings	%	-	90%	95%
E-NZO-7	Proportion of LED in LLA operated Car Parks	%	-	90%	100%
E-NZO-8	Proportion of LED on taxiways	%	-	-	-
E-NZO-9	Proportion of emissions offset/removed through carbon credits	%	-	-	-
Industry Decarbonisation					
E-DCB-1	Proportion of Airside Pooled GSE Low-Carbon	%	-	25%	36%
E-DCB-2	Proportion of based aircraft that are Next-Generation	%	-	47%	60%
E-DCB-3	Proportion of all commercial movements that are Next-Generation	%	-	35%	47%
E-DCB-4	Proportion of all movement that are Next-Generation	%	5%	27%	36%
E-DCB-5	Aircraft LTO emissions per passenger	kgco$_2$e	10.5	9.8	9.5
E-DCB-6	Passenger Sustainable Surface Access Mode Share	%	38%	38%	29%
E-DCB-7	Employee Sustainable Surface Access Mode Share	%	31%	21%	27%
Water					
E-WTR-1	**Water Inflows - Network Withdrawal**	**m3**	**133,334**	**119,573**	**137,100**
E-WTR-2	**Water Outflows -Total**	**m3**	**-**	**1,553,670**	**1,891,798**
E-WTR-3	Water Outflows - Groundwater	m3	-	1,194,480	1,452,662
E-WTR-4	Water Outflows - Seawater	m3	0	0	0
E-WTR-5	Water Outflows - Surface Water	m3	-	336,170	417,955
E-WTR-6	Water Outflows - Third Party Treatment	m3	-	23,020	21,221
E-WTR-7	Water Outflows - Third Party Re-Use	m3	-	-	-
E-WTR-9	Intensity Usage - Water Per PAX	litres/pax	7.41	7.38	8.19
Spills					
E-SPL-1	**Number of Spills**	**no.**	**94**	**53**	**45**
E-SPL-2	Number of Major Spills	no.	7	4	1
E-SPL-3	Number of Negligible Spills	no.	77	47	44
E-SPL-4	Number of Minor Spills	no.	10	2	0

Data Code	KPI	Units	2019	2023	2024
Aircraft De-Icing					
E-ADI-1	Type 1 De-Icing Fluid Used	litres	-	171,261	136,083
E-ADI-2	Type 2 De-Icing Fluid Used	litres	-	67,961	41,029
E-ADI-3	Type 4 De-Icing Fluid Used	litres	-	50,235	22,575
E-ADI-4	Total De-Icing Fluid Collected	litres	-	60,415	39,000
E-ADI-6	Proportion of De-Icing conducted on Designated zones	%	-	21%	9%
E-ADI-7	Total De-Icing Fluid used per Movement	litres/ATM	-	118	101
E-ADI-8	Proportion of Forced Air & Blended to temperature De-Icing	%	-	-	80%
E-ADI-9	Average Winter temperature	degrees	7˚C	8˚C	8˚C
Waste					
E-WST-9	**Total Waste output**	**tonnes**	**2,492**	**2,138**	**2,209**
E-WST-1	Total Hazardous Waste	tonnes	21	26	27
E-WST-2	Total Non-Hazardous waste	tonnes	2,471	2,111	2,182
E-WST-2.1	Plastic Waste	tonnes	-	20	15
E-WST-3	Disposal - Re-use	tonnes	-	55	0
E-WST-4	Disposal - Recycling	tonnes	1,493	1,611	1,811
E-WST-5	Disposal - Waste-to-Energy	tonnes	999	527	398
E-WST-6	Disposal - Landfill	tonnes	0	0	0
E-WST-7	Recycling Rate	%	60%	78%	82%
E-WST-8	Diversion from Landfill	%	-	100%	100%
E-WST-10	Waste Per Passenger	kg/PAX	0.14	0.13	0.13
Air Pollution					
E-AIR-9	Number of Continuous Monitors	no.	-	-	8
Biodiversity					
E-BIO-1	Wildlife Strikes - Confirmed Strike	no.	6	14	40
E-BIO-2	T&E Species Fatalities	no.	-	0	7

Since 2019, LLA has continued to evolve its reporting in line with industry best practice and changes in sustainability reporting frameworks, commencing disclosure when additional metrics were introduced.

Data Code	KPI	Units	2019	2023	2024
Community Trust Fund					
S-COM-1	Annual contribution to Community Trust Fund	£	£150,000	£150,000	£150,000
S-COM-2	Annual contribution to Greener Future Fund	£	-	£89,322	£61,007
S-COM-4	Number of Community Trust Fund Beneficiaries	no.	-	6,269	15,491
S-COM-7	Number of Greener Future Fund Beneficiaries	no.	-	9,397	3,670
Volunteering					
S-COM-9	Number of hours volunteered	hrs	-	380	573
S-COM-10	Proportion of LLA employees volunteering	%	7%	9%	12%
Community Investment					
S-COM-11	Investment in local, regional or national sustainability initaitives	£	-	£30,000	£40,775
S-COM-12	Total Fundraising	£	£104,000	£67,000	£102,676
S-COM-13	Total Matched-Funding	£	£1,000	£800	£3,500
Skills & Education					
S-COM-15	Total number of Transferable Employement Skills Workshops delivered	no.	-	-	10
S-COM-16	Total number of schools involved in skills workshops	no.	-	-	10
S-COM-17	Total number of skills workshops beneficiaries	no.	-	-	200
S-COM-18	Number of Enterprise Advisors	no.	-	-	4
S-COM-20	Proportion of eligible GFF beneficiaries Access to Environmental Education	no.	-	-	1
Biodiversity					
S-COM-19	Number of Local Biodiversity Initiatives	no.	-	-	2

Data Code	KPI	Units	2019	2023	2024
H&S - Employees					
S-HSE-1	Fatalities for employees	no.	0	0	0
S-HSE-2	Loss Time Injuries	no.	-	10	11
S-HSE-3	Number of recordable Accidents	no.	-	46	41
S-HSE-4	Near Miss Incidents	no.	-	2,002	3,405
S-HSE-5	Hours worked	hrs	-	1,503,180	1,758,984
S-HSE-6	Loss Time Injuries frequency rate (per 10k hours)	hrs	-	669	623
S-HSE-15	Number of days (Working time lost)	days	-	133	253
H&S Contractors					
S-HSE-8	Fatalities	no.	-	0	0
S-HSE-9	Loss Time Injuries	no.	-	1.0	1.0
S-HSE-10	Number of recordable Accidents	no.	-	37	36
H&S Passengers					
S-HSE-16	Fatalities	no.	0	0	0
S-HSE-17	Number of Incidents	no.	149	134	157
S-HSE-18	Number of Incidents per 1m PAX	no. /1mPAX	8	8	9
Wellbeing					
S-HSE-21	Number of accredited Mental Health First Aiders	no.	-	47	114
S-HSE-22	Number of managers completing wellbeing training	no.	-	49	96
HR - Development					
S-HRP-1	Number of employees who received professional training (e.g IDP, LDP,Core Skills)	no.	-	97	95
S-HRP-3	Number of Apprentices	no.	-	-	1.0
S-HRP-4	Number of Gradutates & Interns	no.	-	-	2
S-HRP-5	Number of Career Events Attended or Facilitated	no.	10	10	5
S-HRP-6	Average spend per FTE on training & development	Avg £/FTE	-	1,026	993
S-HRP-7	Average hours per FTE of training completed	Avg hrs/FTE	-	36	9

Data Code	KPI	Units	2019	2023	2024
HR - Colleague Survey					
S-HRP-8	Percentage of Employees covered by survey	%	-	100%	100%
S-HRP-9	Survey Response rate	%	-	70%	73%
S-HRP-10	Survey NPS	-	-	37	38
HR - People					
S-HRP-12	Total number of Employees (FTE)	no.	854	817	944
S-HRP-13	Total Number of Contractors (FTE)	no.	-	117	90
S-HRP-14	Employee turnover	no./FTE	1.2	0.9	0.8
S-HRP-15	Total employees in LU1	no.	-	64	84
S-HRP-16	Total employees in LU2	no.	-	200	208
S-HRP-17	Total employees in LU3	no.	-	93	114
S-HRP-18	Total employees in LU4	no.	-	53	61
S-HRP-19	Total Employees inside LU1-LU4	no.	-	410	467
S-HRP-20	Total Value of salaries paid to LU1-LU4 Employees	£	-	£12,962,155	£15,140,503
S-HRP-21	Total Value of Salaries paid to all Employees	£	-	£31,468,970	£36,926,806
S-HRP-22	Total number of Grievance claims made	no.	-	7	7
HR - ED&I					
S-HRP-26	Board Gender Ratio - Proportion Women	%	-	30%	20%
S-HRP-27	Board Gender Ratio - Proportion Men	%	-	70%	80%
S-HRP-30	Board Socioeconomic Background	-	-	-	-
S-HRP-31	Employees - Percentage under 30 years old	%	-	17%	18%
S-HRP-32	Employees - Percentage between 30 and 50 years old	%	-	59%	59%
S-HRP-33	Employees - Percentage over 50 years old	%	-	24%	24%
S-HRP-34	Employees - Gender Pay Gap	%	-	24%	26%
S-HRP-35	Employees Gender Ratio - Proportion Women	%	39%	39%	42%
S-HRP-36	Employees Gender Ratio - Proportion Men	%	61%	61%	58%
S-HRP-40	Number of Work Experience Placements	no.	-	-	11

Data Code	KPI	Units	2019	2023	2024
Supply Chain					
S-SPY-2	Total number of Suppliers	no.	-	895	1,242
S-SPY-3	Total Supply Chain spend	£	-	£132,619,489	£183,776,430
S-SPY-4	Total number of Suppliers in 20 miles of Airport	no.	-	217	284
S-SPY-6	Total supply chain spend in 20 miles of Airport	£	£46,892,190	£52,149,801	£99,465,033
S-SPY-7	Proportion of supply chain spend in 20 miles of Airport	%	30%	39%	54%
S-SPY-8	Total number of Suppliers in 25 miles of Airport	no.	-	262	330
S-SPY-10	Total supply chain spend in 25 miles of Airport	£	-	£70,332,325	£110,210,352
S-SPY-11	Proportion of supply chain spend in 25 miles of Airport	%	-	53%	60%
S-SPY-12	Number of Procurement and Local Supplier Chain workshops held	no.	-	2	1
Guest Exp - Satisfaction Monitoring					
S-GXE-1	Internally Conducted - Passengers covered	N/A	ASQ require 350 per 1/4	ASQ require 350 per 1/4	ASQ require 350 per 1/4
S-GXE-2	Internally Conducted - Passenger survey response rate	%	100%	100%	100%
S-GXE-3	Internally Conducted - Satisfaction rate	score	3.69	4.06	4.07
Guest Exp - Training					
S-GXE-7	Percentage of staff completing Customer Service Training	%	-	100%	100%
Guest Exp - Complaints					
S-GXE-8	Number of Service Complaints	no.	13,297	14,261	7,372
S-GXE-9	Complaints per 1m Passengers	no/1mPAX	738.72	808.30	441
Guest Exp - PRM					
S-GXE-10	CAA PRM Score	score	GOOD	VERY GOOD	GOOD
Guest Exp - Accrediation					
S-GXE-11	ACI Customer Service Accrediation	Level	-	Level 2	Level 3

Since 2019, LLA has continued to evolve its reporting in line with industry best practice and changes in sustainability reporting frameworks, commencing disclosure when additional metrics were introduced.

Data Code	KPI	Units	2019	2023	2024
Corporate Data - Traffic					
G-TRF-1	Passenger Numbers	no.	17,999,969	16,195,068	16,735,984
G-TRF-2	Passengers - Domestic	no.	1,197,578	1,269,674	1,319,302
G-TRF-3	Passengers - International	no.	16,802,391	14,925,394	15,416,682
G-TRF-4	Total Air Traffic Movements	no.	141,481	128,443	131,972
G-TRF-5	Total Commercial Passenger Movements	no.	110,284	98,603	100,954
G-TRF-6	Total Commercial Cargo Movements	no.	2,828	1,989	2,195
G-TRF-7	Total GA Private Movements	no.	28,112	27,621	28,608
G-TRF-8	Other Movements	no.	257	229	215
G-TRF-9	Total Cargo tonnage	tonnes	36,906	26,043	30,667
G-TRF-10	Number of Air Traffic Units	ATU*	32,517,129	29,299,798	30,239,854
G-TRF-11	Number of Airlines	no.	9	8	9
G-TRF-12	Number of Destinations served	no.	141	132	127
G-TRF-13	Number of Countries Served	no.	41	38	38
Corporate Data					
G-COR-1	Number of ESG FTE	no.	-	8	9
Corporate Data - Finance					
G-FIN-1	Total Revenue	£	£226,873,000	£296,584,000	£304,441,000
G-FIN-2	Total Operating Costs	£	£193,811,000	£236,419,000	£257,359,000

*ATU: Passengers + (100*Operations) + (10*Cargo Tons)

Annual Monitoring Report

The following constitutes London Luton Airport Operations Limited's ("LLA") annual report for 2024 in respect of aircraft noise in accordance with planning permission 21/00031/VARCON and the related s106 agreement dated 9 December 2022.

Appendix 1: Aircraft Chapters

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

	Number of aircraft which are Chapter 3	645
	Number of aircraft which are Chapter 4	2782
	Number of aircraft which are Chapter 14	443
	Others	98
	Total	3968

2.47%
11.16%
16.26%
70.11%
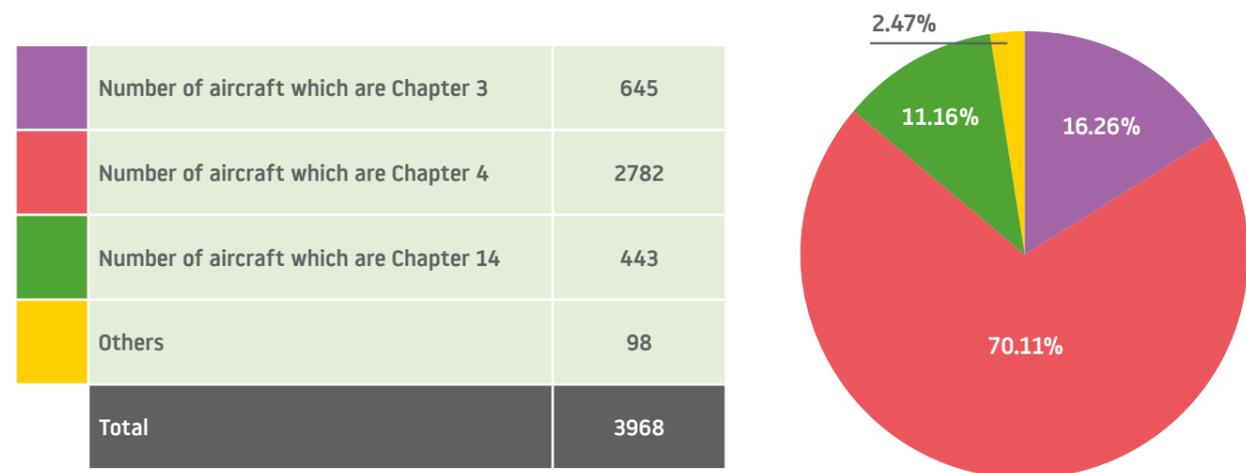
Appendix 2: Noise and Track Violations

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

Month	Number of track violations	Total fines by month	Aircraft types violating
Jan-24	0	0	0
Feb-24	10	£16,000	C680, A20N, A320, GLEX, B752, C56X, A21N, C68A
Mar-24	1	£2,000	E190
Apr-24	2	£2,000	GLF5, GLF6
May-24	5	£9,000	GLEX, B737, E135, A320, FA7X
Jun-24	3	£4,000	GLF6, B38M
Jul-24	3	£3,000	B738, GLEX
Aug-24	6	£6,000	F900, C650, A320, E145, E550, E55P
Sep-24	6	£6,000	GL7T, GLEX, C56X, H25B, LJ36, CL60
Oct-24	7	£8,000	AT72, C680, FA7X, GLF4, LJ36
Nov-24	9	£10,000	A21N, E55P, F900, PC24, GALX, A306, B738, GLF5, H25+
Dec-24	3	£3,000	GLF5, CL35, B738
Total	55	£69,000	-

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-24	0	1	1	£1,000	GLF6
Feb-24	0	0	0	-	-
Mar-24	1	0	1	£2,000	FA7X
Apr-24	2	1	3	£5,000	B738
May-24	0	0	0	-	-
Jun-24	0	0	0	-	-
Jul-24	0	0	0	-	-
Aug-24	0	0	0	-	-
Sep-24	0	1	1	£1,000	B739
Oct-24	0	2	2	£2,000	F900
Nov-24	0	0	0	-	-
Dec-24	0	0	0	-	-
Total	5	3	8	£11,000	-

TABLE 3: CHARGE BY AIRCRAFT TYPE

Aircraft Type	Charge- Track	Charge- Noise
B738	4 (£4,000)	3 (£5,000)
A320	5 (£9,000)	0
F900	2 (£2,000)	2 (£2,000)
FA7X	3 (£3,000)	1 (£2,000)
GLEX	4 (£5,000)	0
GLF6	3 (£3,000)	1 (£1,000)
GLF5	3 (£3,000)	0
A21N	2 (£3,000)	0
B739	0	1 (£1,000)
C56X/ C680/ CL60/ E55P/ LJ36	2 (£2,000)	0
A20N/ B38M/ B737/ B752/ E135/ E190/ GLF4/ H25+	1 (£1,000)	0
A306/ AT72/ C650/ C68A/ CL35/ E145/ E550/ GALX/ GL7T/ H25B/ PC24	1 (£1,000)	0

TABLE 4: CHARGE BY AIRLINE

Airline	Charge- Track	Charge- Noise
EasyJet	5 (£9,000)	£0
EL AL Israel Airlines	1 (£1,000)	1 (£1,000)
DHL	2 (£3,000)	£0
Harrods Aviation	9 (£11,000)	1 (£2,000)
Israir	1 (£1,000)	£0
Malta MedAir	1 (£1,000)	£0
NETJETS	4 (£4,000)	£0
Ryanair	1 (£2,000)	1 (£2,000)
Signature	27 (£31,000)	3 (£3,000)
TUI	2 (£2,000)	2 (£3,000)
Wizz Air	2 (£3,000)	£0

Appendix 3: CDA Compliance

TABLE 3: CDA COMPLIANCE (%) BY OPERATOR

CDA compliance by aircraft operator		
Operators	No. of arrivals	% of CDA compliance
easyJet	22,324	97%
Wizz Air	19,553	96%
Ryanair	6,959	99%
European Air Transport	1,043	90%
TUI	528	99%
El Al	479	90%
MNG Airlines	53	94%
London Executive Aviation	296	94%
Israir	51	88%
VistaJet	1,190	85%
NetJets	1,559	86%
Sun Express	190	94%
Signature	7,090	80%
Metro business aviation	3,633	83%
Others	828	92%
All	65,776	94%

Appendix 4: Complaints Data

TABLE 4: NUMBER OF NOISE COMPLAINTS AND COMPLAINANTS FOR 2024

Month	No. specific complaints	No. of general complaints	Total complaints	No. complainants
Jan-24	503	16	519	31
Feb-24	382	40	422	30
Mar-24	281	46	327	35
Apr-24	383	43	426	40
May-24	621	102	723	71
Jun-24	687	86	773	69
Jul-24	538	73	611	59
Aug-24	475	53	528	56
Sep-24	752	48	800	40
Oct-24	302	33	335	41
Nov-24	139	22	161	26
Dec-24	289	18	307	24
Total	5,352	580	5,932	522

TABLE 5: COMPARISON OF COMPLAINT AND COMPLAINANT DATA FOR 2023 – 2024

	2023	2024	% change
Total no. of complaints relating to LLA aircraft operations	15,688	5,932	62.2% decrease
No. of complainants	1,108	522	52.9% decrease
No. of general complaints	1,306	580	55.6% decrease
No. of specific complaints	14,382	5,352	62.8% decrease
Average no. of complaints per complainant	14.1	11.4	21.2% decrease
No. of aircraft movements per complaint	8.1	22.2	19.1% increase

TABLE 6: OVERVIEW OF COMPLAINTS DATA

Number of individuals contacting the airport only once	313
% contacting the airport only once	60%
Number of individuals reporting concerns for the first time	86
% of complaints from 10 individuals	90.16%
Number of complaints concerning night noise	87
Number of specific complaints concerning night noise disturbance from LLA	52
Main source of complaints (e.g. West arr, dep, East arr or deps)	West Arrivals
Five top locations for complaints	Cambridge Wheathampstead Harpenden Impington Horningsea

TABLE 7: NUMBER OF SURGERIES IN 2024

Location of surgery	Month	Attendees (approx.)	Key concerns
South Luton	February	10	Easterly arrivals and westerly departures
Caddington	March	7	Easterly arrivals
Farley	April	5	Easterly arrivals
Abbotsley	May	7	New arrival Airspace change (AD6)
Dallow	June	2	Easterly arrivals
Markyate	July	6	Westerly departures
Whitwell	September	3	Westerly arrivals

Appendix 5: Aircraft Movements

TABLE 8: TOTAL AIRCRAFT MOVEMENT OVERVIEW

Total aircraft movements	131,974
Number of passenger movements	100,271
Number of cargo movements	1,741
Number of positioning movements	1,126
Number of non-commercial movements	28,830

TABLE 9: NON-COMMERCIAL AIRCRAFT MOVEMENT OVERVIEW

Breakdown of non-commercial movements	
General aviation	28,609
Military	0
Official	0
Other	216
Test & Training	5

TABLE 10: TOTAL PASSENGER OVERVIEW

Number of domestic passengers	1,318,559
Number of international passengers	3,400,383
Total Passengers	16,735,030

TABLE 11: AVERAGE AIRCRAFT MOVEMENT BY HOUR

Hour	Average hourly arrivals	Average hourly departures	Average hourly movements
00:00-00:59	5	1	6
01:00-01:59	5	1	6
02:00-02:59	3	1	4
03:00-03:59	2	0	2
04:00-04:59	1	1	2
05:00-05:59	1	2	3
06:00-06:59	1	15	16
07:00-07:59	13	17	30
08:00-08:59	7	16	23
09:00-09:59	6	14	20
10:00-10:59	7	8	15
11:00-11:59	9	8	17
12:00-12:59	11	10	21
13:00-13:59	11	10	21
14:00-14:59	10	10	20
15:00-15:59	9	10	19
16:00-16:59	9	10	19
17:00-17:59	11	8	19
18:00-18:59	10	10	20
19:00-19:59	10	9	19
20:00-20:59	11	8	19
21:00-21:59	9	7	16
22:00-22:59	12	5	17
23:00-23:59	9	1	10

TABLE 12: CARGO OVERVIEW

	Day movements	Night movements	Total	Tonnes
2023	689	1,300	1,989	26,043
2024	894	1,302	2,196	30,677
2023/2024 comparison	-29.70%	-0.15%	-10.4%	-17.8%

Appendix 6: Movement by Aircraft Type

TABLE 13: MOVEMENT BY AIRCRAFT TYPE OVERVIEW

Aircraft type movements % of total movements		
Aircraft type	Movements	% of total movements
A306	1,133	0.9%
Airbus A319	17,684	13.4%
Airbus A320	20,376	15.4%
Airbus A320 NEO	16,509	12.5%
Airbus A321	5,872	4.4%
Airbus A321 NEO	24,218	18.4%
Airbus A330	20	0.0%
Beechcraft Twin Turboprop	415	0.3%
Boeing B737-300	24	0.0%
Boeing B737-400	24	0.0%
Boeing B737-500	6	0.0%
Boeing B737-700	72	0.1%
Boeing B737-800	9,484	7.2%
Boeing B737-900	446	0.3%
Boeing B737 Max 8	6,768	5.1%
Boeing B757	981	0.7%
Boeing B767	48	0.0%
Boeing B777	-	0.0%
Boeing B787	46	0.0%
Canadair Global Express GLEX	3,598	2.7%
Cessna Citation Family	4,743	3.6%
Canadair Challenger Family	403	0.3%
Dassault Falcon FA7X	871	0.7%
Embraer Legacy 450-650 series	1,899	1.4%
Embraer ERJ-135	821	0.6%
Learjet Family	286	0.2%
Gulfstream 3, 4 & 400 series GLF3/GLF4	563	0.4%
Gulfstream 5 and 500 series GLF5	1,280	1.0%
Gulfstream 650 GLF6	2,498	1.9%
Helicopters	362	0.3%
Pilatus PC-12	1,039	0.8%
Other aircraft	9,485	7.2%
TOTAL	131,974	100%

TABLE 14: MOVEMENT BY OPERATOR OVERVIEW

Operators	Movements
easyJet	44,370
Wizz Air	38,924
Ryanair	13,766
DHL	954
MNG Airlines	1,634
TUI Airways	879
Fly One	567
Others	924
Total	102,018

TABLE 16: 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	58,211	1,863	5,563	7,771
Arrivals	56,399	7,533	264	9,593
Total	114,610	9,396	5,827	17,364

Appendix 7: Night Quota

TABLE 15: 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-24	565	145.625	381
Feb-24	525	138.375	342
Mar-24	542	133.25	373
Apr-24	741	178.875	589
May-24	823	200.625	605
Jun-24	686	199	546
Jul-24	710	198.75	537
Aug-24	729	196	548
Sep-24	732	195.5	536
Oct-24	781	203	545
Nov-24	467	155.375	358
Dec-24	463	154.625	397
Total	7,764	2,099	5,757

Appendix 8: Correlated Noise Events

TABLE 17: DAYTIME AND NIGHT-TIME NOISE EVENTS BY SOUND INTENSITY (DB)

dB (A)*	Daytime	Night-time	Total
<70	6,644	712	7,356
70	3,015	508	3,523
71	5,853	943	6,796
72	6,699	1,026	7,725
73	6,883	941	7,824
74	6,335	812	7,147
75	4,203	533	4,736
76	2,132	260	2,392
77	1,065	126	1,191
78	435	28	463
79	147	12	159
80	43	2	45
81	4	1	5
82	1	0	1
83	0	0	0
84	0	0	0
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.
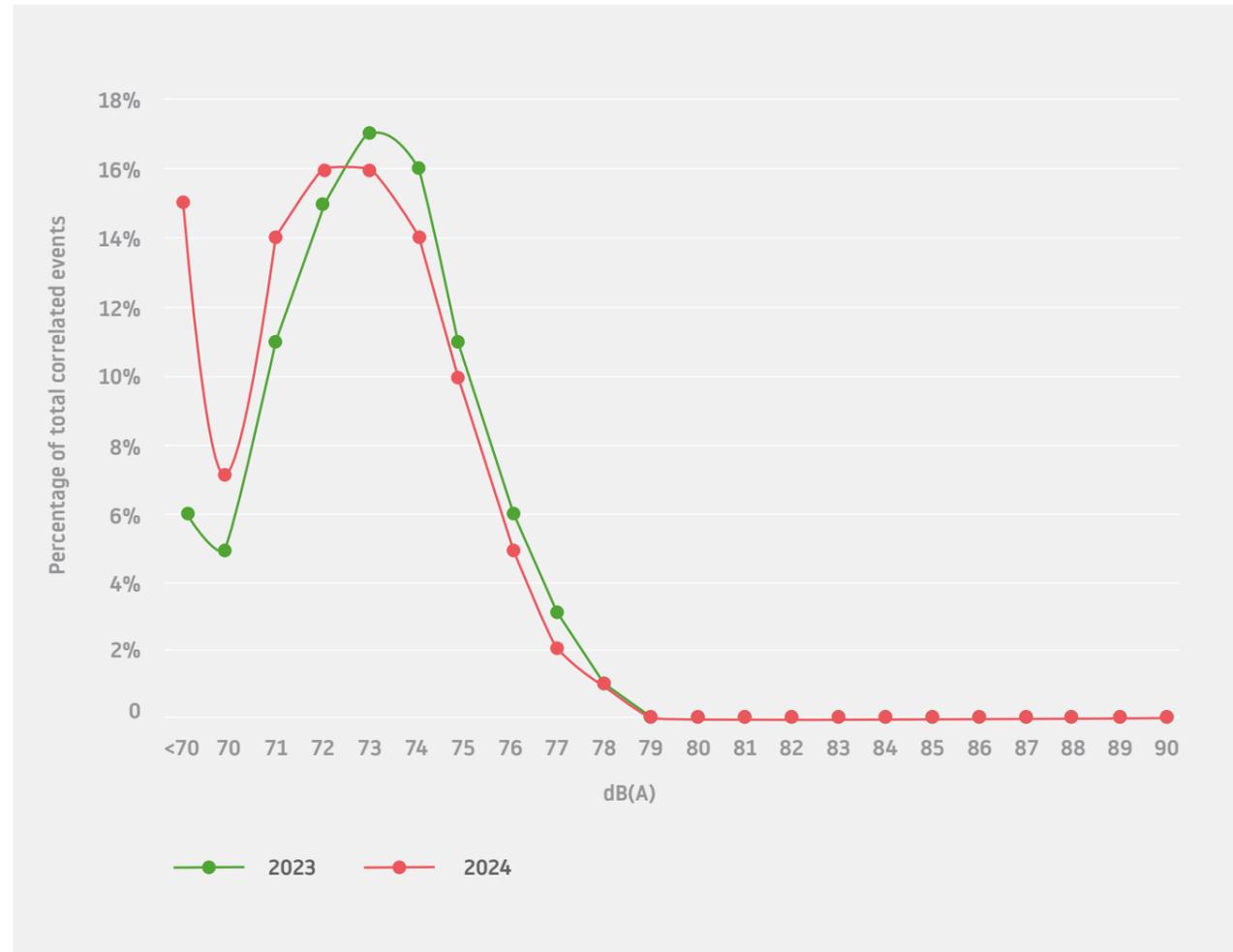
Appendix 9: Noise Insulation

TABLE 18: NOISE INSULATION INVESTMENT OVERVIEW

Total amount invested	£478,894
Number of properties insulated	138
Number of properties contacted	163

Appendix 10: Contour plans

2024 AND 2025 SUMMER NOISE CONTOURS

10.0 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 were to be compared to the limits contained in Condition 12.

When the subsequent permission was granted for increased passenger throughput at Luton Airport (Application 21/00031/VARCON) a replacement set of conditions were imposed. This permission has now been enacted which means the size of the noise contours at the airport are to comply with Condition 9 of the new permission.

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 2024 and forecast movements for 2025. These contours provide part of the information required to comply with Condition 9. Also required is information on the actual and forecast aircraft noise movements.

10.1 CONTOUR PRODUCTION

Aircraft movement data for use in the contour production has been supplied by LLAOL. In the summer period seventeen flights associated with the 19th July IT disruption were subject to a dispensation and have therefore not been included in the 2024 summer contours.

The 2024 contour production methodology has been updated from that used for the 2023 contours. It retains the inclusion of terrain, and the use of the INM software (Version 7.0d), and custom departure profiles for key aircraft types based on radar data, but the validation has been updated. The validation is now based on measured results from the fixed noise monitors in 2023.

The updated methodology results in contours that are around 10% larger than those produced using the previous methodology. This is due to an increase in measured noise levels in 2023 compared to those from 2022 which were used for the previous methodology. The update to the methodology is discussed in more detail in BAP note A11060-N85-DR.

The 2025 forecast contours are based on the actual movements in summer 2024 with an allowance for expected additional summer flights in 2025. Specifically, 920 additional flights by the Airbus A321neo in the daytime and 184 additional flights by the Airbus A321neo in the nighttime.

10.2 RUNWAY USAGE

The 2024 contours are based on the actual runway usage (modal split) in 2024. The 2023 contours, which are included for comparison, are based on the actual runway usage in 2023.

The forecast 2025 contours have been produced based on the long term (2020-2024 average) modal split, which is shown in Table 19 along with the values for 2023 and 2024.

10.3 NOISE CONTOUR RESULTS

The noise contours for 2024 and 2025 are shown in the attached Figures A11060-N86-01 to A11060-N86-04. 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 20 (daytime) and Table 3 (night-time), and compared with the corresponding 2023 contour.

The 2024 57 dB daytime contour is around 10% larger than the equivalent 2023 contour. This is due to an increase in the number of daytime movements in 2024 compared to 2023 and the updated contour methodology, which more than offset the increase in the proportion of quieter modernised types in 2024. The 2024 57 dB $L_{Aeq,16h}$ contour area is less than the airports current contour area limit of 21.1 km^2.

The 2025 forecast daytime contours are larger than those for 2023 and 2024. The 57 dB $L_{Aeq,16h}$ contour area is less than the airports current contour area limit of 21.1 km^2.

TABLE 19: 2023, 2024 AND LONG TERM SUMMER MODAL SPLIT

Year	% of summer movements	
	Runway 07	Runway 25
2023 Actual	21%	79%
2024 Actual	24%	76%
Long Term Average (2020-2024)	30%	70%

TABLE 20: AREA OF DAYTIME SUMMER NOISE CONTOURS, 2023, 2024 AND 2025 (FORECAST)

Contour Value (dB LAeq,16h)	Contour area (km²)		
	2023	2024	2025 (Forecast)
57	14.0	15.4	15.9
60	7.5	8.2	8.4
63	4.4	4.8	4.9
66	2.3	2.5	2.6
69	1.2	1.3	1.3
72	0.7	0.8	0.8

TABLE 21: AREA OF NIGHT-TIME SUMMER NOISE CONTOURS, 2023, 2024 AND 2025 (FORECAST)

Contour Value (dB LAeq,16h)	Contour Area (km²)		
	2023	2024	2025 (Forecast)
48	33.0	34.7	36.0
51	19.0	19.8	20.3
54	10.1	10.7	11.1
57	5.7	5.9	6.1
60	3.2	3.3	3.4
63	1.5	1.6	1.7
66	0.9	0.9	0.9
69	0.5	0.6	0.6

The 2025 forecast daytime contours are larger than those for 2023 and 2024. The 57 dB $L_{Aeq,16h}$ contour area is less than the airports current contour area limit of 21.1 km².

The 2024 48 dB night-time contour is around 6% bigger than the equivalent 2023 contour. This is due to the updated contour methodology, which is partially offset by the increase in the proportion of quieter modernised types in 2024. The 2024 48 dB $L_{Aeq,8h}$ contour area is less than the airports current contour area limit of 42.1 km².

The 2025 forecast night-time contours are larger than those for 2023 and 2024. The 48 dB $L_{Aeq,8h}$ contour area is less than the airports current contour area limit of 42.1 km².

The 57 dB $L_{Aeq,16h}$ (daytime) noise contours for 2023, 2024 and 2025 are compared in Figure A11060-N86-05. The daytime contours for all three years are similar in shape. What difference there is arises to the west and east of the airport and is partly due to the different modal splits, as Runway 07 was used by 21% of flights in summer 2023 but the long term average use assumed for 2025 is 30%.

The 48 dB $L_{Aeq,8h}$ (night-time) noise contours for 2023, 2024 and 2025 are compared in Figure A11060 N86-06. The night-time contours for all three years are similar in shape except in the area to the west of airport near Caddington. There the greater proportion of Runway 07 operations modelled for 2025 based on the long term modal split means the contour extends further from the airport.

10.4 DWELLING AND POPULATION COUNTS

An assessment has been carried out of the number of dwellings and the population within the noise contours produced for 2023 and 2024. This has utilised a postcode database supplied by CACI Ltd, specifically the 2023 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 in Table 22 and Table 23 for the daytime and nighttime contours 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 2023 counts given here utilise the latest postcode database, and so may differ from those previously reported.

10.5 SUMMARY

Noise contours have been produced for 2024 based on the actual movements during the summer period. The contours are slightly larger than those for 2023. This is due to an increase in the number of movements and the updated contour methodology, which more than offset the increase in the proportion of quieter modernised types in 2024.

Forecast noise contours have also been produced for 2025. These are slightly larger than the 2024 contours. The 2025 57 dB daytime and 48 dB night-time contours are forecast to remain within the corresponding current contour area limits.

Dwelling and population counts for the daytime and night-time contours for both 2023 and 2024 have been determined based on a 2023 postcode database.

TABLE 22: DWELLING AND POPULATION COUNTS FOR DAYTIME SUMMER NOISE CONTOURS, 2023 AND 2024

Contour Value (dB LAeq,16h)	2023		2024	
	Dwellings	Population	Dwellings	Population
57	3,950	9,300	4,200	9,800
60	1,550	4,050	2,000	5,150
63	400	1,150	500	1,350
66	1	4	1	4
69	0	0	0	0
72	0	0	0	0

TABLE 23: DWELLING AND POPULATION COUNTS FOR NIGHT-TIME SUMMER NOISE CONTOURS, 2023 AND 2024

Contour Value (dB LAeq,16h)	2023		2024	
	Dwellings	Population	Dwellings	Population
48	7,800	18,350	8,700	20,250
51	5,000	11,650	5,100	11,750
54	2,450	6,200	2,450	6,300
57	750	2,050	750	2,050
60	50	200	150	350
63	0	0	0	0
66	0	0	0	0
69	0	0	0	0

FIGURE 3: 2024 SUMMER ACTUAL DAY
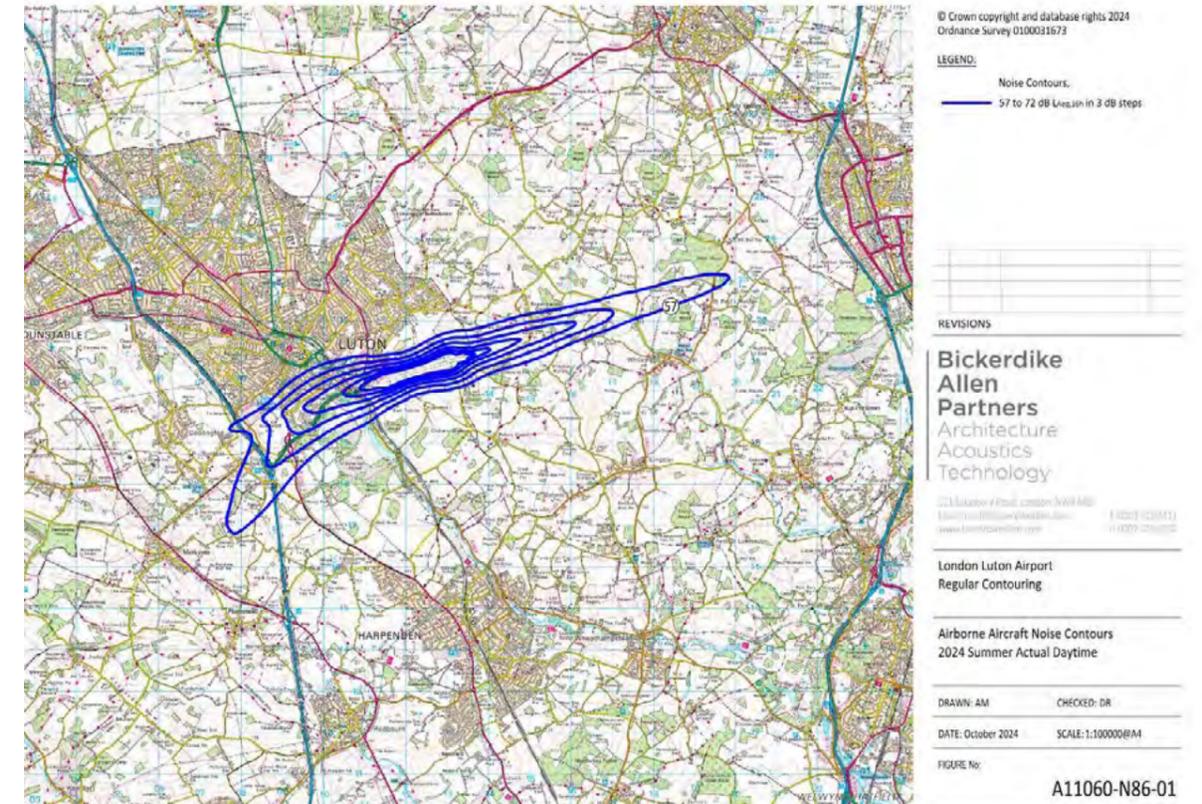
FIGURE 4: 2024 SUMMER ACTUAL NIGHT
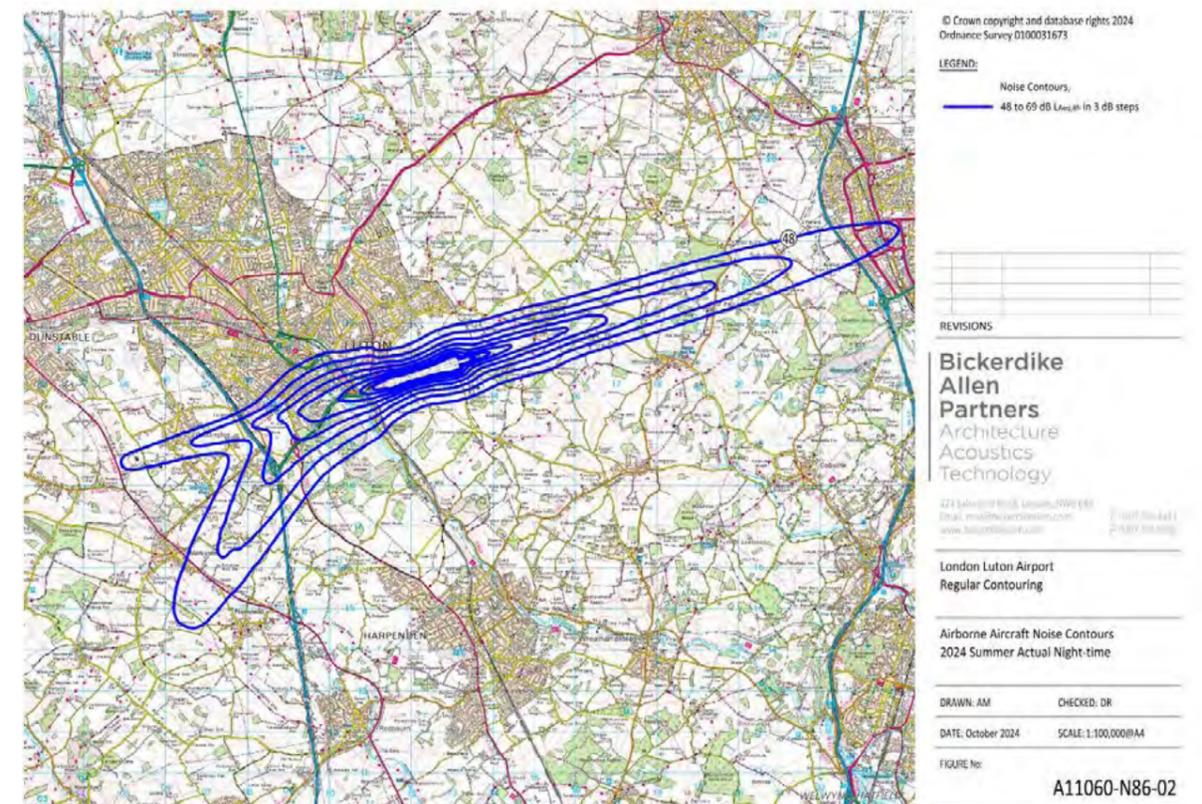
FIGURE 5: 2024 SUMMER DAYTIME COMPARISON 2022, 2023 AND 2024
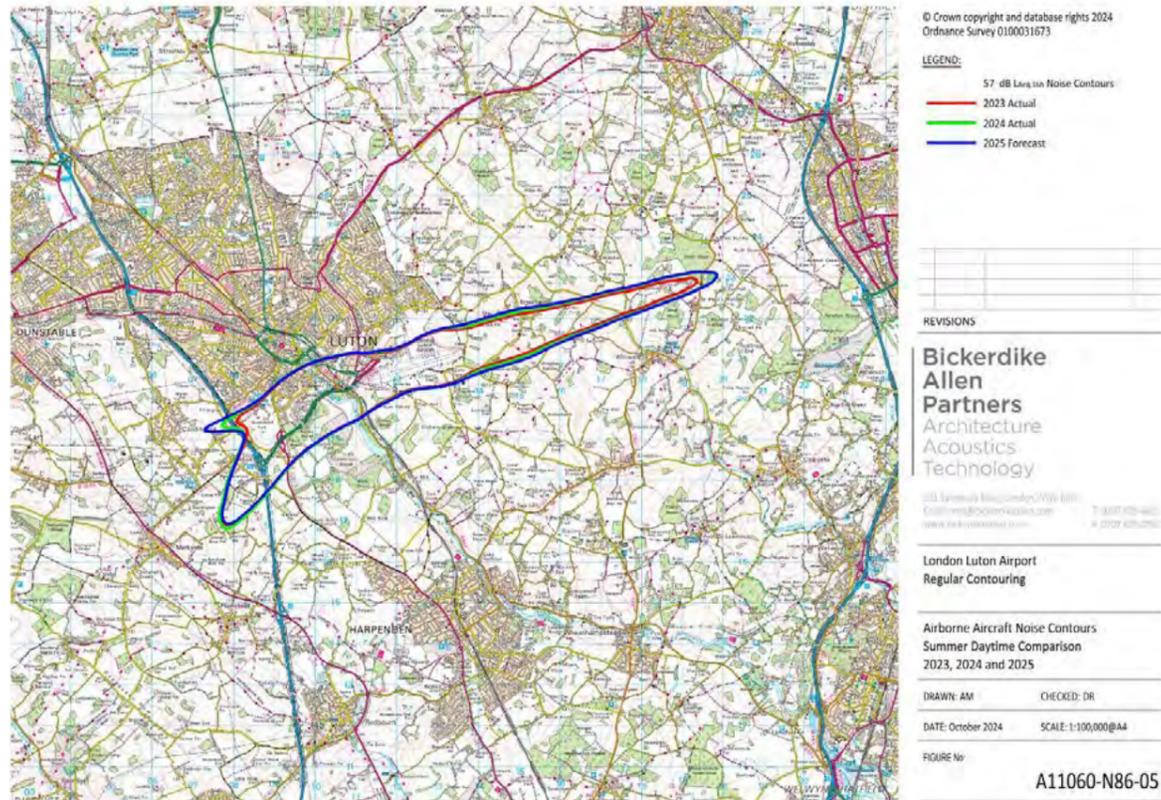
FIGURE 6: 2024 SUMMER NIGHT-TIME COMPARISON 2022, 2023 AND 2024
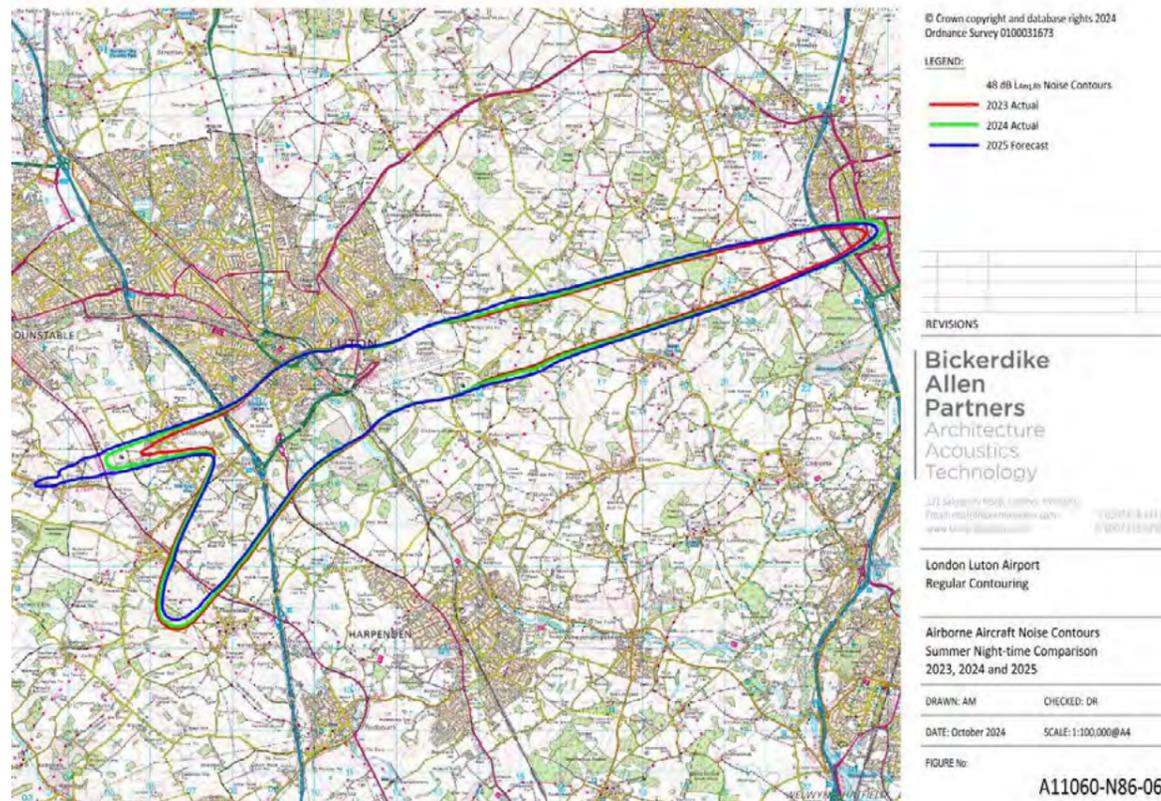
2024 ANNUAL CONTOURS

10.6 INTRODUCTION

London Luton Airport Operations Limited (LLAOL) have retained Bickerdike Allen Partners (BAP) to produce the annual L_{den} noise contours for 2024. The corresponding annual L_{night} noise contours have also been produced. These metrics are central to the airport's Noise Action Plan.

10.7 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 2024 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 2023 at the fixed noise monitors with departure profiles for key aircraft types based on radar data. This validation update leads to larger contours as the measured noise levels in 2023 were higher than those in 2022 which were previously the basis.

10.8 AIRCRAFT MOVEMENTS

The 2024 aircraft movements used for the production of the noise contours as supplied by LLAOL are summarised and compared with those for 2023 in Table 24 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 by them are grouped together in the "Other" category.

TABLE 24: ANNUAL AIRCRAFT MOVEMENT NUMBERS BY INM AIRCRAFT TYPE

INM aircraft type	Day		Evening		Night	
	2023	2024	2023	2024	2023	2024
1900D	360	337	89	43	34	23
737700	145	138	41	34	9	21
737800	7,874	7,044	2,345	1,948	1,475	936
737800 (MAX)	2,404	4,583	660	1,076	649	1,109
757RR	36	30	8	3	952	948
A300-622R	560	706	94	95	345	332
A319-131 (ceo)	11,434	11,933	3,910	3,973	1,781	1,806
A320-211 (ceo)	14,759	12,418	7,265	6,173	2,760	1,762
A320-211 (neo)	8,261	10,683	2,345	2,657	2,740	3,189
A321-232 (ceo)	6,735	3,767	2,626	1,616	1,462	458
A321-232 (neo)	11,068	15,129	3,234	3,975	3,320	5,133
CIT3	49	80	15	12	2	2
CL600	1,017	972	144	135	34	47
CL601	2,408	2,648	374	444	122	122
CNA208	335	365	64	72	64	71
CNA500	135	136	26	16	6	1
CNA510	227	176	45	27	18	12
CNA525C	1,766	1,768	266	243	62	66
CNA55B	836	925	124	136	28	26
CNA560U	85	73	18	7	13	10
CNA560XL	2,151	1,940	312	221	71	53
CNA680	908	1,185	131	165	32	27
CNA750	993	1,123	135	157	33	36
EMB145	1,194	1,243	255	223	96	63
EMB190	188	209	30	54	23	10
F10062	1,040	1,123	264	256	145	122
GIV	475	396	96	117	45	50
GV	5,953	6,690	1,284	1,449	776	813
IA1125	65	61	13	7	4	6
LEAR35	588	362	109	77	61	25
MU3001	176	137	31	29	5	6
Other	291	275	77	42	34	44
Total	84,516	88,692	26,430	25,503	17,201	17,341

The actual runway used by each movement during the individual day, evening and night periods of 2024 has been allowed for in the preparation of the contours. Table 25 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 2023.

10.9 NOISE CONTOUR RESULTS

The resulting noise contours are shown in the attached Figures A11060-N87-01 and A11060-N87-02. They are presented at values from 55 to 75 dB(A) L_{den} and 48 to 66 dB(A) L_{night}. Comparisons between the 2024 and the 2023 noise contours are shown in the attached Figures A11060-N87-03 and A11060-N87-04 at 55 dB(A) L_{den} and 48 dB(A) L_{night} respectively. The areas, population and dwelling counts relating to each noise contour are given in Table 26 for L_{den} and Table 27 for L_{night}, where they are compared with the values for 2023.

10.10 NOISE CONTOUR COMPARISON

The total number of annual movements increased in 2024 compared to 2023. The annual number of movements remains around 7% lower than occurred pre-pandemic in 2019.

The annual fleet mix in 2024 is broadly similar to that in 2023, with Airbus and Boeing passenger jets making up the majority of the movements in both years. The total movements have risen by 3% compared to 2023, with the proportion of movements performed by quieter modernised aircraft increasing, from 34% in 2023 to 46% in 2024.

As can be seen from Table 26 and Table 27, the areas of the L_{den} and L_{night} contours have increased, primarily due to the update of the contour validation. The increase in the area of the 2024 contours compared to 2023 can be seen in figures A11060-N87-03 & 04, which compare the 55 dB L_{den} and 48 dB L_{night} contours respectively. The population and number of dwellings within the contours have also increased, due to the larger contour areas.

TABLE 25: ACTUAL ANNUAL RUNWAY USAGE (PERCENTAGE OF TOTAL MOVEMENTS)

Runway end	2023	2024
07	31%	29%
25	69%	71%

TABLE 26: CONTOUR AREAS AND POPULATION & DWELLINGS WITHIN CONTOURS - L_{DEN}

Contour value (dB(A) L_{den})	Contour area (km²)		Population[1]		Dwellings[2]	
	2023	2024	2023	2024	2023	2024
55	34.8	36.6	19,000	20,300	8,000	8,650
60	13.4	14.2	8,100	8,000	3,400	3,500
65	5.1	5.3	1,500	1,800	600	700
70	1.7	1.8	0	<100	0	<50
75	0.7	0.7	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 27: CONTOUR AREAS AND POPULATION & DWELLINGS WITHIN CONTOURS - L_{NIGHT}

Contour value (dB(A) L_{night})	Contour area (km²)		Population[3]		Dwellings[4]	
	2023	2024	2023	2024	2023	2024
48	28.6	30.0	16,000	17,400	6,850	7,500
51	16	16.8	9,500	9,800	4,050	4,300
54	8.4	8.8	4,300	4,700	1,650	1,900
57	4.9	5.1	1,400	1,800	500	650
60	2.7	2.8	<100	<100	<50	<50
63	1.3	1.4	0	0	0	0
66	0.8	0.8	0	0	0	0

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

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

FIGURE 7: 2024 ANNUAL L_{DEN}-LTN REPORT
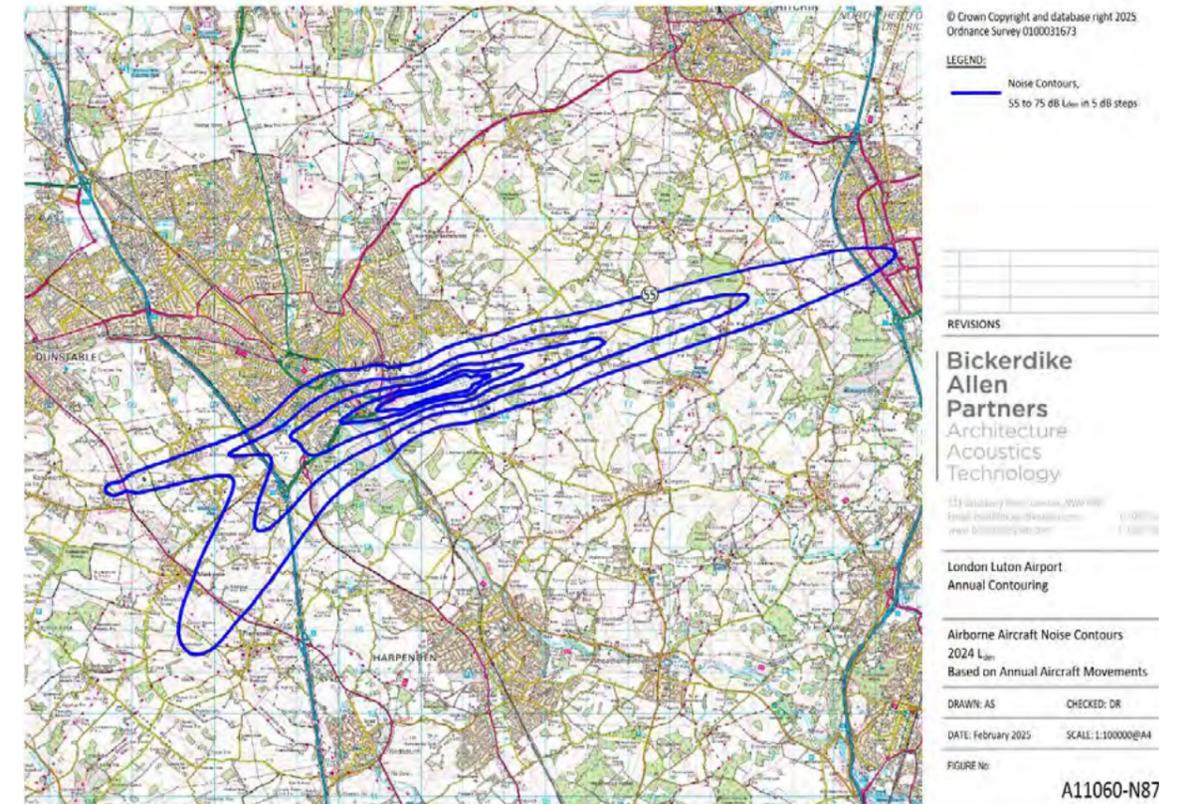
FIGURE 8: 2024 ANNUAL L_{NIGHT}-LTN REPORT
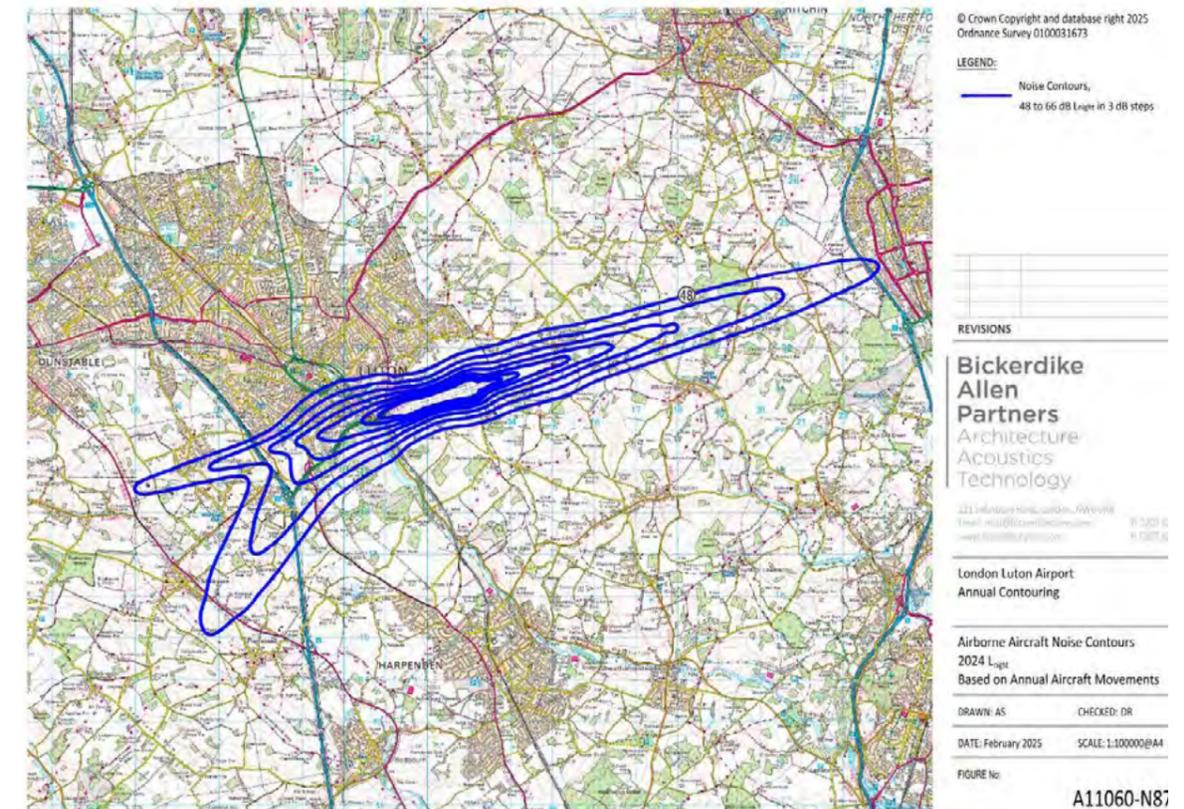
MARGINAL COMPLIANCE ASSESSMENT

10.11 INTRODUCTION

Planning consent was granted in 2014 by Luton Borough Council (LBC) 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 2024.

10.12 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 28. 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 smaller propeller aircraft is to different standards and so these aircraft have been separately recorded. Military aircraft are not subject to noise certification and therefore are included in this category. There were 2 movements by military aircraft in 2024.

TABLE 28: 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 Smaller Propeller Aircraft (n/a)
January 2024	0	8,542	0	88
February 2024	0	9,122	0	100
March 2024	0	9,838	0	103
April 2024	0	11,040	0	110
May 2024	0	12,287	0	167
June 2024	0	12,325	0	164
July 2024	0	12,690	0	152
August 2024	0	12,044	0	108
September 2024	0	11,960	0	107
October 2024	0	11,591	0	92
November 2024	0	9,002	0	130
December 2024	0	10,097	0	105
2024 Total	4	130,538	0	1,426

Taking the year as a whole, there were 130,538 movements where Chapter 3 categorisation is applicable. Of these, none were by marginally compliant Chapter 3 aircraft.

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

[2] https://app02.bazl.admin.ch/web/bazl/en/#/lfr/search

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

10.13 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 108/2024[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 Noise Databases published by the CAA[5]. In some cases the 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.

TABLE 29: MONTHLY NUMBER OF NIGHT TIME (23:00-07:00) QC 2 AIRCRAFT MOVEMENTS.

Month	Number of QC2 aircraft movements (23:00-07:00)
January 2024	0
February 2024	0
March 2024	0
April 2024	0
May 2024	0
June 2024	0
July 2024	0
August 2024	0
September 2024	0
October 2024	0
November 2024	0
December 2024	0
2024 Total	0

There were no night-time aircraft movements classified as QC 2 or greater in 2024.

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

[5] https://www.caa.co.uk/commercial-industry/aircraft/airworthiness/certificates-and-permits/noise-certificates/aircraft-noise-certificate/

Appendix 11: 2023 CONTOURING METHODOLOGY UPDATE

11.0 INTRODUCTION

Since 2012, London Luton Airport Operations Limited (LLAOL) have retained Bickerdike Allen Partners LLP (BAP) to produce quarterly night noise contours in accordance with the Night Noise Policy.

The contouring methodology uses the Federal Aviation Administration's (FAA) prediction program, the Integrated Noise Model (INM), and the actual number and mix of aircraft during the quarter, which is supplied by the airport. The methodology is reviewed periodically to ensure that the accuracy of the contours is maintained. A review has recently been completed resulting in the 2024 methodology, which will be used for all 2024 contours. Compared to the previous (2023) methodology, reported in the note A11060-80-DR, the key change is the routine update of the validation exercise so that it is based on the most recent annual set of measured results from the airport's noise and track keeping (NTK) system, i.e. those for the calendar year of 2023.

Sections 2.0 to 7.0 describe the main assumptions used in the modelling and highlight the changes from the previous methodology. Section 8.0 assesses the effect of the methodology update by comparing contours for the first quarter of 2024 produced using both methodologies.

11.1 SOFTWARE

The 2023 contours were produced using INM version 7.0d, which was released on 30th May 2013. This has been replaced by the FAA with the Aviation Environmental Design Tool (AEDT) as of May 2015. Until this new software has been fully trialled and validated for use at Luton Airport, the earlier INM software has continued to be used.

11.2 ARRIVAL AND DEPARTURE TRACKS

Arrivals are modelled as straight approaches, along the runway centreline. Departure tracks are based on the published Standard Instrument Departures (SIDs) as given in the UK Aeronautical Information Publication (AIP). From runway 07 there are three modelled initial departure tracks; one to Rodni, one to Olney, and one to Match/Detling. From runway 25 there are four; these are to the same set of destinations, however the route to Match/Detling has an additional track for the RNAV version of the route. The majority of aircraft use the RNAV version of the route. The movement data supplied by the airport gives details of the specific departure tracks used.

11.3 LOCAL TERRAIN

Local terrain has been included in the model, as it was in the previous methodology.

11.4 DEPARTURE PROFILES

Custom departure profiles are used to model the key aircraft types, specifically the Airbus A319ceo, A320ceo, A320neo, A321ceo, A321neo, and the Boeing 737-800 and 737 MAX 8. These custom profiles are based on radar data from the airport's NTK system for 2021, and are the same as those used in the 2023 methodology. For the other aircraft types, the standard INM departure profiles have been used.

Based on information provided by LLAOL, westerly departures to short haul destinations and all easterly departures are modelled as performing intersection takeoffs. Westerly departures to long haul destinations are modelled as using the full runway length.

11.5 STAGE LENGTH

In the INM software, departure profiles and weights are determined by the stage length parameter, which categorises aircraft based on the distance to their destinations. Destination information has been used to determine departure weights, as was the case in the previous methodology.

11.6 UPDATE OF VALIDATION

The validation exercise undertaken by BAP has been updated so that it is based on the most recent set of annual measured results from the airport's NTK system. For the most common and loudest aircraft types the previous validation exercise, which used 2022 measured data, has been updated based on measured results in 2023.

Flights longer than 1,500 nm have been modelled as performing full length departures from Runway 25. Those flying shorter stage lengths and all Runway 07 departures have been modelled as performing intersection departures. For most aircraft they perform relatively few of these longer flights, however for certain types they are relatively common. This prevalence of longer flights is the case for the Airbus A320ceo, A320neo, A321neo, the Boeing 737-800 and 737 MAX 8. For these types the short haul and long haul departures have been validated separately.

In 2022 there were fewer long haul flights by the Boeing 737 MAX 8 and therefore all flights by this aircraft type were previously validated together. In 2022 there were more long haul flights by the Airbus A321ceo and therefore short haul and long haul departures by this type were previously validated separately, but all flights by this aircraft type are now validated together.

The measured sound exposure levels (SELs) obtained for five of the key aircraft types operating at Luton Airport, from the fixed Noise Monitoring Terminals (NMTs) in 2022 and 2023, are shown in Table 30. These are the averages of hundreds or in some cases thousands of results for each operation. For most types the noise levels are only for departures under 1,500 nm, the exception is the Airbus A321ceo in 2023 which includes the small number of departures over 1,500 nm.

For the validation itself the average at each individual monitor is considered, and the validation attempts to achieve the best fit with the results. In this it is considered that the results from NMT 3, due to its proximity to the motorway, are likely to overstate the aircraft noise, particularly for quieter types.

The average measured arrival noise levels in 2023 are higher than those measured in 2022 for all five aircraft types. The departure noise levels have similarly increased from 2022 to 2023. This is believed to be due to a recovery in load factors for passenger flights, following the COVID-19 pandemic. Due to the measured noise level changes, the validation has been updated to

increase some of the predicted levels for the types for both arrivals and departures. The updated validated predicted levels are given in Table 30. These show good agreement between the modelled noise levels and 2023 measured noise levels with all differences being small, at less than 1 dB.

Aside from these key types, changes have also been made to the modelled arrival and departure noise levels for several other validated types, based on changes in their measured levels. Specifically, the modelled arrival noise levels for the Boeing 737 MAX 8,

Bombardier Global Express, and Gulfstream G650 have all increased slightly, due to increases in the average measured arrival noise levels for these types. The modelled departure noise level has been increased for the Airbus A319ceo due to higher measured noise levels. The modelled departure noise levels for the Boeing 757-200, Bombardier Global Express, and Gulfstream G650 have decreased slightly, due to a decrease in the average measured departure noise levels for these types.

The Cessna 560 Excel was validated in 2023 but not in 2024, due to this aircraft type no longer operating in sufficient numbers. In 2024 any movements by this aircraft type will be modelled using the default INM assumption. The Boeing 737-900 has been newly validated in 2024, due to an increase in movements by this type.

TABLE 30: COMPARISON OF MEASURED SOUND EXPOSURE LEVELS – FIXED NMTS

Aircraft type[1]	Operation	Movement-weighted NMT noise level, SEL dB(A) [2]		
		2022 average	2023 average	Validated INM prediction
Airbus A320ceo	Arrival	84.2	85.0	85.0
	Departure	83.7	84.1	83.4
Airbus A320neo	Arrival	83.4	84.1	84.2
	Departure	80.4	80.6	80.7
Airbus A321ceo [1]	Arrival	83.9	84.9	84.8
	Departure	85.1	85.7	85.6
Airbus A321neo	Arrival	83.9	84.6	84.8
	Departure	83.1	83.5	83.3
Boeing 737 800	Arrival	85.2	86.2	86.0
	Departure	85.3	85.8	86.0

[1] In 2023 allows for all departures including those >1,500 nm

[2] Only NMT1 results used for arrivals. NMT10 and NMT3 given half weighting as each aircraft movement typically results in 2 measured noise events.

11.7 CONTOUR COMPARISON

The contours for the first quarter of 2024 have been computed using both methodologies and are compared in Figure 01. Contours at 69 and 72 dB LAeq,8h have also been produced but are not individually distinguishable when plotted at the scale of the figure. The areas of all the contours are given in Table 31.

As can be seen from Table 31, the methodology update results in an increase in the area of the noise contours. The increase in area is around 10%, although it varies slightly for the different noise contour levels. The increase in contour area is primarily due to the increase in measured arrival and departure noise levels, and consequential increase in modelled noise levels for many of the validated aircraft types.

TABLE 31: COMPARISON OF NIGHT-TIME NOISE CONTOUR AREAS

Contour value (dB LAeq,8h)	Jan – Mar 2024 contour area (km²)		
	2023 Methodology	2024 Methodology	Change (%) [3]
48	22.1	24.1	+9%
51	12.1	13.5	+11%
54	6.7	7.3	+8%
57	3.9	4.3	+10%
60	2.0	2.3	+12%
63	1.1	1.2	+8%
66	0.7	0.7	+8%
69	0.4	0.4	+7%
72	0.3	0.3	+7%

[3] Percentage change based on unrounded contour areas.

Appendix 12: 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	2025	Reduction of NVL's.	Residents within and beyond 55dB L_{den}	Reduce NVLs to 79dB during the day time by 2026 and 78dB during the night time by 2025.	Work underway with operators to reduce NVL. Came into effect from March 2025.
1.2	We will work with our airline partners to maintain performance relating to Continious Decent Operations (CDO) to minimise noise impact to the communities below.	Arrival Noise	Ongoing	CDO compliance.	Residents within and beyond 55dB L_{den}	Maintain 95% compliance	2024 CDO performance was 94%.
1.3	We will work with neighbouring airports, ACOG and stakeholders to submit an airspace change proposal as part of FASI-S, in line with the airspace modernisation strategy.	Departure and Arrival Noise	2028	FASI-S airspace change proposal.	Residents within and beyond 55dB L_{den}	Submit a FASI-S airspace change proposal by 2025/ 2026 and implement by 2028 (Subject to CAA approval).	LLA continued to work with neighbouring airports. Also new government initiative consultation on UKADS took place, which LLA engaged with.
1.4	We will partner with a UK university to explore, through research, feasible ways in which noise can be reduced at Luton.	Arrivals, departures and ground noise	2026	Minutes of Flight Operations committee (FLOPC) meetings.	Residents within and beyond 55dB L_{den}	Partner with university by 2027 and trial suggested changes based on research.	LLA developed a Memorandum of Understanding with Cranfield University in 2024.
1.5	Continue to promote the arrivals and departures code of practice, working with our airline partners to review with feasible initiatives.	Arrivals, departures and ground noise	2024-2028	Evidence of the review.	Residents within 55dB L_{den}	To review the ACOP and DCOP bi-annually.	Engagement with operators in 2024, however full review of practices is scheduled for 2025.
1.6	Continue to promote and encourage the use of single engine taxi procedures at London Luton Airport, through airfield points of engagement.	Ground Noise	Ongoing	Visual Monitoring on airfield.	Residents within and beyond 65dB L_{den}	Increase the number of points of engagement each year, with at least 80% of operators detailed in their SOPs.	Engagement with operators took place in 2024.
1.7	We will work with our airline partners to promote and encourage the delayed landing gear deployment and explore ways to measure and automate reporting in relation to landing gear deployment.	Arrival Noise	Ongoing	Minutes of FLOPC meetings.	Residents within 55dB L_{den}	Deployment of landing gear monitoring system by the end of 2027 (if feasible).	Engagement with operators took place in 2024.
1.8	Work with our partners with Sustainable Aviation we will challenge current operational procedures to ensure best practice.	Departure/ Arrival Noise	Ongoing	Minutes of Sustainable Aviation meetings.	Residents within and beyond 55dB L_{den}	To review procedures bi-annually in line with Sustainable Aviation best practice.	LLA regularly engages with Sustainable Aviation regarding noise.

TABLE 33: OPERATIONAL PROCEDURES (CONTINUED)

Ref:	Action	Impact	Timescale	Performance indicator	Numbers affected	Target	Progress to date
1.9	We will investigate the implementation of the low noise arrival metric (CAP 2302) at Luton and consider this in future airspace changes.	Arrival Noise	2024	Evidence of review	Residents within and beyond 55dB L_{den}	To explore opportunities and make appropriate changes (if feasible).	Study undertaken in 2024, results due to be published in 2025.
1.10	We will work with our airline partners to improve performance relating to off track aircraft to minimise noise impacts to the communities below.	Departure Noise	Ongoing	Track keeping performance	Residents within and beyond 55dB L_{den}	To achieve 99.8% compliance by 2025.	LLA's track keeping performance in 2024 was 99.9%.
1.11	We will explore opportunities to increase the vectoring release altitude for each of the departing noise preferential routes (NPR's).	Departure Noise	2024	Evidence of review	Residents within and beyond 55db L_{den}	To review vectoring release altitude by 2025 and implement any changes by 2027.	Project delayed from 2024, started in 2025.
1.12	We will survey airlines to understand best practice relating to reducing noise and encourage continuous improvement.	Arrivals, departures and ground noise	2025	Evidence of Survey	Residents within and beyond 55dB L_{den}	To conduct a survey by 2026 and share best practise with stakeholders by 2027.	Work not started in 2024, scheduled for 2025.

TABLE 34: QUIETER AIRCRAFT

Ref:	Action	Impact	Timescale	Performance indicator	Numbers affected	Target	Progress to date
2.1	We will continue to work with our Airlines 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	2027	% of Chapter 4 aircraft.	Residents within and beyond 55dB L_{den}	100% Chapter 4 by 2027 and 75% Chapter 14 by 2028.	Work underway to encourage modern aircraft to operate at LLA.
2.2	We will continue review our landing charges annually and incentivise airlines to adopt the use of the quietest aircraft at London Luton Airport e.g. Airbus NEO, Boeing and Max.	Departures/ Arrival and ground noise	Ongoing	Publication of Charges and Conditions of use	Residents within and beyond 55dB L_{den}	To increase the number of Chapter 14 aircraft at LLA.	Increase of NEO/ Max aircraft operating at LLA in 2024, this has been achieved through incentives with operators.
2.3	We will support our airlines partners to transiton to next generation aircraft (after NEO's and MAX), through noise trials at LLA should these aircraft be operational in the lifetime of this Noise Action Plan.	Departures/ Arrival and ground noise	2028	Trial of next generation aircraft at LLA	Residents within and beyond 55dB L_{den}	To engage with operators and manufacturers to support transition to next generation aircraft.	Work not started in 2024.
2.4	We will continue to voluntarily ban QC2 aircraft during the night time period (2300hrs - 0700hrs).	Departure/ Arrival/ Ground Noise	Ongoing	Annual Monitoring of night time QC usage	Residents within and beyond 48db L_{den}	To ensure no QC2 operations occur during the night time period.	There were no QC2 movements during the night period in 2024.

TABLE 35: OPERATIONAL RESTRICTIONS

Ref:	Action	Impact	Timescale	Performance indicator	Numbers affected	Target	Progress to date
3.1	We will operate within our consented night movement caps.	Night Noise	Ongoing	Annual monitoring of night time movements.	Residents within and beyond 48dB L_{night}	To operate within our consented limits	LLA operated within limits.
3.2	We will continue to operate within our agreed Total Annual Quota Count (QC) caps.	Night Noise	Ongoing	Annual monitoring of night time QC	Residents within and beyond 48dB L_{night}	To operate within our consented limits	LLA operated within limits.
3.3	We will operate within our consented contour area limits.	Night Noise	Ongoing	Annual monitoring of noise contours	Residents within and beyond 55db L_{den} (Day, evening, night)	To operate within our consented limits	LLA operated within limits.
3.4	To review LLA's noise contour reduction strategy and explore any new inititaives which could minimise the noise disturbance to local communities.	Arrivals/Departure Ground noise	Ongoing	Evidence of review	Residents within and beyond 55db L_{den} (Day, evening, night)	To review LLA's noise contour reduction strategy and explore suitable new initiatives which could minimise the noise disturbance to local communities.	In 2024, a new noise contour reduction strategy was approved by LLA's local planning authority.
3.5	In order to minimise ground noise, we will monitor and enforce restrictions around the use of aircraft Auxillary Power Unit's (APU's).	Ground Noise	Ongoing	Number of points of engagement carried out	Residents within 65db L_{den} (Day, evening, night)	Increase the number of points of engagement with operators each year on APU usage.	Engagement continued with operators in 2024.
3.6	In order to minimise ground noise, particularly at night, we will restrict the permitted hours for engine testing to day time periods only.	Ground Noise	Ongoing	Log of engine testing	Residents within and beyond 48db L_{night}	Restrict engine testing for aircrafts to the day time period only, report annually any instances of testing during the night.	No engine testing took place in 2024 during the restricted night period.
3.7	To review the visual reference points around Luton and the helicopter departure procedure.	Arrivals/Departure Ground noise	2026	Reporting on a quarterly basis, helicopter compliant data.	Residents within 65db	Minimise disturbance to communities who are overflown currently by helicopters.	Work not started in 2024.

TABLE 36: 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 Insuation Schemes.	Ground/Departure/Arrival Noise	Ongoing	Noise Insulation update in annual reporting.	Residents within eligible noise contours.	Continue to insulate those properties which are eligible.	138 Properties were insulated in 2024.
4.2	We will continue to carry out surveys to those property owners that have has insulation installed as part of the NIS, to measure the levels of satisfaction with the scheme.	Ground/Departure/Arrival Noise	Ongoing	Survey results	Residents within eligible noise contours	Conduct annual survey of insulated properties. Report results of survey to Noise Insulation Sub-Committee.	Satisfaction surveys were sent to properties insulated in 2024.
4.3	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 UK government legislation.	Ground/Departure/Arrival Noise	Ongoing	Stages in CAP1616 process	Residents within and beyond 55db L_{den}*	Preserve quiet areas through Airspace Change Process as far as possible.	Work in progress through airspace change process.
4.4	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	Engagement with local authorities.	N/A	Increase awareness for local authorities through engagement.	Work ongoing in 2024.
4.5	We will develop an airport information pack to supply to local estate agents with information regarding LLA's operations.	Ground/Departure/Arrival Noise	2026	Information pack developed and circulated to local estate agents.	N/A	Information pack to be developed and circulated by 2027	Work not started in 2024.
4.6	We will develop a vortex damage repair scheme to repair roofs that have been damaged by aircraft vortices (subject to eligibility criteria).	Arrivals and Departures routes	2024	Evidence of scheme in place	Residents within and beyond 55db L_{den}*	Develop vortex damage repair scheme by 2025.	Project delayed from 2024, started in 2025. No claims for vortext damage were submitted in 2024.
4.7	We will conduct a review of the locations of our fixed noise monitoring terminals and increase or relocate where necessary. (Note. this action is dependant upon completion of Action 1.3 Airspace modernisation).	Community Relationship	2028	Evidence of review	N/A	Conduct review by 2029	Work not started in 2024.

TABLE 37: WORKING WITH THE LOCAL COMMUNITY AND INDUSTRY PARTNERS

Ref:	Action	Impact	Timescale	Performance indicator	Numbers affected	Target	Progress to date
5.1	Carry out biannual 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	Ongoing	Results of survey.	N/A	Carry out next survey by 2025 and set improvements in 2026	Project delayed from 2024, started in 2025.
5.2	We will improve communications through continuing our community newsletter (inform) and reports.	Community relationship	Ongoing	Evidence of community newsletter and reports on website.	N/A	Publish newsletter quarterly	Inform published x3 in 2024.
5.3	We will engage with local stakeholders regarding the initatives the Flight Operations team continue to work on. This includes Aircraft Noise and Airspace Modernisation.	Community relationship	Ongoing	Evidence in QMR	N/A	Meet with at least 5 stakeholders per year	12 engagement sessions held during 2024 including Airspace and Noise week. 60 appoinments made during public surgeries.
5.4	We will regularly organise public surgeries 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.	8 public surgeries held in 2024.
5.5	We will log enquiries and complaints relating to airport operations in accordance with our noise complaints policy and publish complaint statistics in our QMR & AMR.	Community relationship	Ongoing	Evidence in QMR and AMR	N/A	Regularly publish stastics in monitoring reports on quarterly and annual basis	Complaint data logged and published in quarterly flight operations reports.
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.	NAP progress published in Sustainability Report in 2024.
5.7	We will give the public access to our online noise and track monitoring system and work with the supplier to enhance future functionality.	Community relationship	Ongoing	Evidence of flight tracking website.	N/A	Maintain and enhance functionality of flight tracking website.	TraVis was maintained during 2024, upgrade planned for 2025.
5.8	We will divert all money raised from noise and track violations charge 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.	£80,000 collected in Noise and track violations in 2024, diverted to Community Trust Fund.
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.	Quarterly Reports published on LLA's website.
5.10	We will arrange biannual Airspace and Noise engagement weeks in partnership with NATS, ACOG and our airlines for our local stakeholders.	Community relationship	2024	Evidence in AMR.	N/A	To complete and host the Noise and Airspace week in biannually.	Airspace and Noise week hosted in 2024.

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.

13. 1 LOCAL PLAN

The Luton Local Plan (2011-2031) was adopted in November 2017 and is the statutory development plan for the area. In July 2024 the Council's Executive approved a timetable for the production for a new Local Plan for Luton, with consultation on the new Local Plan commencing in December 2024.

The Luton Local Plan (2011-2031) 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; and

- town centre inset map.

These are available on the Council's website at:

www.luton.gov.uk/Environment/Planning/ Regional%20and%20local%20planning/ Pages/Local%20Plan%202011%20-%20 2031.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 (now known as Green Horizon's Park) and Wigmore Valley Park.

13.2 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 2024, determined that year, or else have been undertaken pursuant to an earlier planning permission:

- Details pursuant to three planning conditions within the Secretary of States' decision letter permitting the increase in the passenger cap to 19 million passengers per annum, and the variation of the summer contour areas (ref: 21/00031/VARCON), were approved by the Council in April 2024, namely:

- 24/00203/DOC: the Airport's Travel Plan and Car Park Management Plan, pursuant to condition 18 of the Secretary of States' decision;

- 24/00204/DOC: the Airport's Noise Reduction Strategy, pursuant to condition 9 of the Secretary of States' decision; and

- 24/00205/DOC: the Airport's Carbon Reduction Strategy, pursuant to condition 19 of the Secretary of States' decision.

- There were a number of applications in 2024 related to the Green Horizon's Park development (formerly known as New Century Park), located to the north of the Airport. These included:

- 24/00227/AMEND: in March 2024 the Council confirmed that the insertion of the words 'excluding the skate park and children's play area works' into conditions 9, 26, 28, 29 and 34 of the original permission (ref: 17/02300/EIA) would not be a material change to the planning permission previously granted;

- 24/00389/DOC: in May 2024 the Council approved details in relation to conditions 6 (heritage asset resource management), 12 (remediation strategy), 14 (contamination monitoring), 18 (redundant bore hole management), 19 (surface water drainage), 27 (secured by design) and 39 (protected species surveys);

- 24/00440/DOC: in June 2024 the Council approved details in relation to condition 24 (design codes) in so far as they related to the Light Industrial Quarter;

- 24/00493/DOC: in June 2024 the Council approved details in relation to conditions 7 (Construction Environmental Management Plan) and 11 (unexploded ordnance) in so far as they related to the skate park and children's play areas;

- 24/00513/AMEND: in May 2024 the Council confirmed that alterations to the design and layout of the skate park and children's play areas were non material amendments;

- 24/00631/AMEND: in June 2024 the Council confirmed that the insertion of the words 'sub-phase or building' within condition 2 was a non-material amendment; and

- 24/00764/REM: in September 2024 the Council approved the reserved matters in relation to the first building within the Light Industrial Quarter, pursuant to condition 2 of permission 24/00631/ AMEND.

- In May 2024, the Council confirmed that the reconstruction of the multi-storey car park (MSCP2) which had been destroyed by fire in October 2023, was permitted development (ref: 24/00333/GPDOPD)

- In October 2024, details of the lighting scheme in so far as it related to Taxiway Golf, pursuant to condition 11 of planning permission 21/00031/VARCON, were approved (ref: 24/00949/DOC);

- In October 2024, details of the surface water drainage scheme in so far as it related to Taxiway Golf, pursuant to condition 11 of planning permission 21/00031/VARCON, were approved (ref: 24/01010/DOC);

- In November 2024, the Council confirmed that the provision of one additional airport stand adjacent to the two stands that are within the engine run up bay, was permitted development (ref: 24/01125/GPDOPD); and

- In November 2024, details of the programme for Taxiway Golf extension, pursuant to condition 2 of planning permission 21/00031/VARCON, were approved (ref: 24/01111/DOC).

One further application of note is the Development Consent Order (DCO), submitted by the airport owner, Luton Rising, and which was the subject of Examination by the Planning Inspectorate (PINS), concluding in February 2024. The proposal entails an increase in passenger capacity to 32 million passengers per annum, involving the construction of a new terminal, additional taxiways and stands, landside buildings, and transport infrastructure improvements (PINS ref: TR020001). The Inspectors submitted their report to the Secretary of State for Transport in May 2024, with the decision expected to be announced by the Secretary of State in August 2024. However, this decision was delayed first, by the calling of a general election, and then by the resignation of the Secretary of State for Transport, and consequently a decision was not issued in 2024.

13.3 HOTEL DEVELOPMENTS

The Luton hotel market is very much dominated by airport related demand, from passengers and crew. The Luton Hotel Study (July 2015) formed the evidence base for the Local Plan (2011-2031), and indicated that demand was likely to continue to grow. The Council is gathering evidence to inform the emerging Local Plan.

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 2023 Sustainability Report was produced –

TABLE 38: HOTEL DEVELOPMENTS

Site address	Current status of application	Number of bedrooms
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). An amended application was reported to Committee in December 2024 with a resolution to grant (subject to the completion of a legal agreement).	150
New Century Park (Green Horizon's 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 (the permission has been implemented, the hotel is yet to be built).	145
Wenlock Court, Manor Road (Town Centre)	Planning permission granted November 2022 removing the cap on the number of rooms that could be used for guest accommodation, from an earlier permission permitting the change of use from student accommodation to flexible hotel/student accommodation.	274
Courtyard by Marriott Airport Way	Planning permission granted July 2024 for eight storey hotel comprising 171 bedrooms (yet to be implemented).	171
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 (Town Centre)	Planning permission for 20 additional hotel rooms granted April 2022 (conditions discharged and permission implemented).	20
Icon Hotel, Stuart Street (Town Centre)	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
Leeside Hotel, New Bedford Road (Town Centre)	Planning application for the conversion and change of use from a hotel to a 19 person house in multiple occupation was submitted in December 2024 and has yet to be decided.	-23

13.4 NATIONAL AVIATION POLICY

The Aviation Policy Framework (APF) published in March 2013 set out the 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 and 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 existing 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-CO_2 impacts.

13.5 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 (which commenced operation in 2023); and

- 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 it as it grows.

The LTP does not make direct reference to the Airport Surface Access Strategy 2024-2028 (ASAS), however, the ASAS (published in 2024) is relevant in promoting sustainable travel to the airport for both passengers and employees.' The ASAS informed the Travel Plan proposals approved pursuant to the Secretary of States' decision to allow the growth of the airport to 19 million passengers per annum.

In August 2024 the Council commissioned consultants to begin work on LTP5, which is anticipated to be completed in 2026.

14.0 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. Employment in and around the airport has been estimated and is presented in this report using the latest data from 2024.

14.1 METHODOLOGY

A list of businesses at London Luton Airport was matched with the Inter Departmental Business Register[1] (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.

The airport employment figure comprised of businesses inside the airport and companies outside the airport boundary in the following areas:

- 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. This methodology is consistent throughout the time series.

14.2 TOTAL EMPLOYMENT IN AND AROUND THE AIRPORT

TABLE 39: EMPLOYMENT BY INDUSTRY, LUTON AIRPORT & VICINITY 2024

Industrial sector	Total employees
Accommodation and food service activities	900
Administrative and support service activities	4,000
Financial and insurance activities	#
Manufacturing	600
Professional, scientific and technical activities	300
Public administration & defence; compulsory social security	300
Real estate activities	#
Transportation and storage	7,300
Wholesale and retail trade; repair of motor vehicles and motorcycles	200
Grand total	13,800

Source: Inter Departmental Business Register (IDBR), Office for National Statistics

 # 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 IDBR 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 13,800 employees in and around the airport. Employment increased by 14 per cent between 2023 and 2024. The largest industrial sector represented is transportation and storage with 7,300 employees and there are 4,000 employees in the administration and support services sector.

14.3 FULL TIME AND PART TIME EMPLOYMENT

The total number of full-time employees was 11,600 in 2024 which increased by 1,300 between 2023 and 2024, an increase of 13 per cent. The figure for part time employees was 2,200 which increased by 300, a rise of 16 per cent over the last year.

TABLE 40: EMPLOYMENT BY FULL TIME & PART TIME WORK, LUTON AIRPORT & VICINITY 2024

	Full time employees	Part time employees
Vicinity of Luton Airport	84%	16%
Luton UA	65%	35%

Source: Business Register & Employment Survey (BRES) 2023, latest data. Figures are percentages of those in employment.

Table 34 shows the percentage split of full/part time employees found at the airport compared to that found in Luton as a whole. 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.

14.4 LONG TERM TRENDS

The numbers recorded as in employment in and around Luton Airport increased from 12,100 to 13,800 between 2023 and 2024, an increase of 14 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. Employment at the airport returned to pre pandemic levels in 2022 and has continued to rise since then. In 2024 employment is now at the highest level recorded and has increased by 45 per cent since 2015.

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

Year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Airport Employment	9,500	9,300	10,200	10,400	11,200	11,200	10,600	11,100	12,100	13,800

Source: Business Intelligence, Luton Council

■ Airport Employment
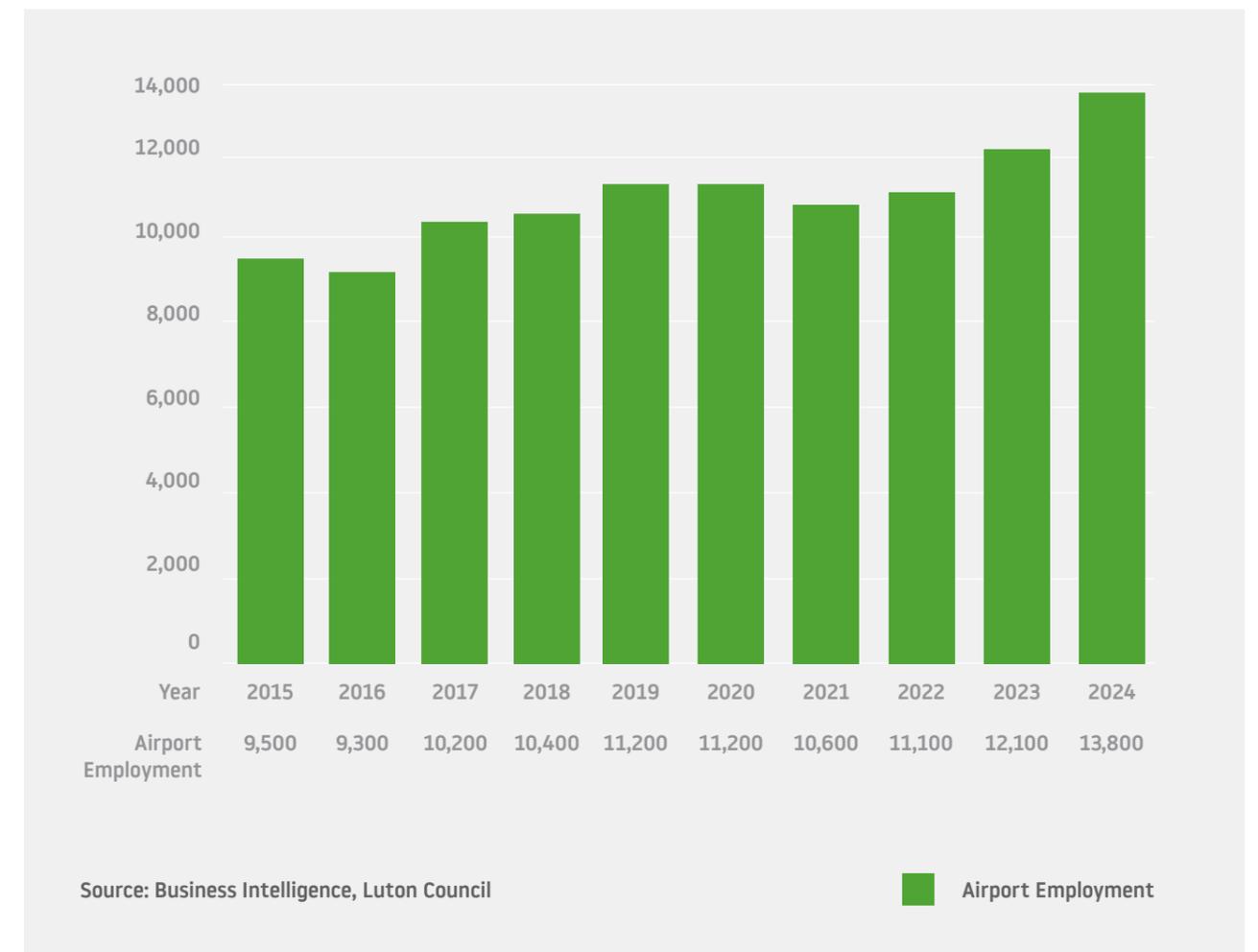
[1] The IDBR combines administrative information on VAT traders and PAYE employers with ONS survey data in a statistical register comprising over two million enterprises, representing nearly 99% of economic activity. Analyses that are produced as part of this service are at the same level at which business statistical surveys are conducted. *(Source: ONS website www.statistics.gov.uk).*

Appendix 15: Community Trust Fund

TABLE 41: COMMUNITY TRUST FUND AMOUNT AND LOCATION

Organisation Name	Amount Awarded	Local Authority
Chiltern Academy	£10,000.00	Central Bedfordshire
Cockernhoe Endowed CofE Primary School	£10,000.00	North Hertfordshire
Denbigh Primary School	£10,000.00	Luton
Groundwork East	£9,851.00	Luton
Hillborough Junior School	£9,711.00	Luton
Penrose Options	£9,800.00	Luton
St Annes Community Garden	£1,645.00	Luton
Bedfordshire Hospitals NHS Charity	£10,000.00	Luton
Bloomin' Well CIC	£5,000.00	Central Bedfordshire
Blunham youth FC	£4,095.00	Central Bedfordshire
Buckinghamshire Disability Services	£9,337.00	Central Bedfordshire
Friends of Ardley Hill	£3,000.00	Central Bedfordshire
Level Trust	£9,333.00	Luton
Luton Phoenix Football Club	£5,600.00	Luton
Luton Town Football Club Community Foundation	£10,000.00	Luton
Q:alliance	£9,533.00	Central Bedfordshire
Stevenage FC Foundation	£10,000.00	Stevenage
St Luke's Leagrave	£9,851.00	Luton
The Need Project	£10,000.00	Central Bedfordshire
The Trauma Healing Collective CIC	£9,515.00	Luton
USP CIC	£9,400.00	Luton
Young Enterprise	£6,031.00	Luton
22	**£181,702.00**	

Note: The beneficiary figures are based upon anticipated beneficiary numbers recorded by groups when they are apply, as opposed to actual figures, which we would not receive until they complete relevant monitoring reports. Figures therefore may slightly differ to the end data, although Foundation staff have reviewed numbers before compiling this report to try and provide the most accurate data possible.

LLA Carbon Reduction Strategy & GHG Management Report

The following constitutes London Luton Airport Operations Limited's ("LLA") annual report for 2024 in respect of LLA's Carbon Reduction Strategy in accordance with planning permission 21/00031/VARCON and the related s106 agreement dated 9 December 2022

About
London Luton Airport

The UK's 5th largest airport, with ambitious plans to grow and continue to serve London and the surrounding counties, with a focus on implementing sustainability initiatives to help mitigate the airport's environmental impact

London Luton Airport

2024 Performance

16.7m
Passengers

131k
Air Traffic Movements

30k
Cargo (t)

£1.3bn
Regional economic impact

Unique approach to sustainable growth with LLAOL's ownership structure.

aena INFRABRIDGE
a division of DIGITALBRIDGE

Operating at London Luton Airport Operations Limited (LLAOL)

Key Accreditations

airport carbon accredited
TRANSFORMATION

BEST EUROPEAN AIRPORT
2024

GRESB
INFRASTRUCTURE
sector leader 2024

Our Carbon Reporting Approach

LLAOL's 2024 GHG statement on scope 1 & 2 emissions has been verified as satisfactory in line with ISO 15064-3: 2019.

Purpose

The purpose of this report is to present the carbon footprint of London Luton Airport (LLA) for the 2024 period covering 1st January 2024 to 31st December 2024. During this time, LLA served 16,735,984 passengers with a total of 131,972 air traffic movements (ATMs).

The calculation of GHG emissions and publication of LLA's annual carbon management performance update helps LLA's stakeholders to understand the different emission sources which contribute to the overall carbon footprint and monitor performance on an annual basis.

LLA has committed to achieving Net Zero in scopes 1 & 2 (Airport Operations) by 2040, which is delivered using the carbon footprint process. The process helps to identify and track emission hotspots and improvement opportunities which will enable the decarbonisation of LLA's carbon footprint.

This report is managed and published by LLA's Sustainability team.

Process and Approach

The calculation and publication of LLA's carbon footprint is supported by LLA's Greenhouse Gas (GHG) inventory methodology document, which outlines the GHG inventory, methodology, processes for boundary definition and data collection and calculation for London Luton Airport Operations Limited (LLAOL).

The document also details LLAOL's alignment with the GHG protocol, Airport Carbon Accreditation (ACA) Level 4 and ISO 14064 carbon accounting standards.

By calculating the emissions of LLAOL in line with these standards and methodology, LLAOL can demonstrate to its stakeholders including customers, shareholders, partners and local community that it is committed to transparently reporting and deliver reductions on GHG emissions.

All emissions are reported under a location-based methodology in line with LLA's Net Zero roadmap, unless otherwise stated (e.g. to show use of REGO electricity).

All emissions are also reported back to LLA's baseline of 2019, which is the highest operational output point for the airport.

LLA's Carbon Emission Boundaries

London Luton Airports carbon emissions boundaries demonstrates the relevant sources for each emission scope and category based upon the latest Airport Carbon Accreditation Level 4 requirements, GHG protocol Corporate Reporting standard and ISO 14064-1. Emissions are reported under Scopes 1, 2 (Our Airport Emissions) and 3 (Our Partners Emissions).

Landside Activity | Terminal Operations | Airside + Airspace

1000m
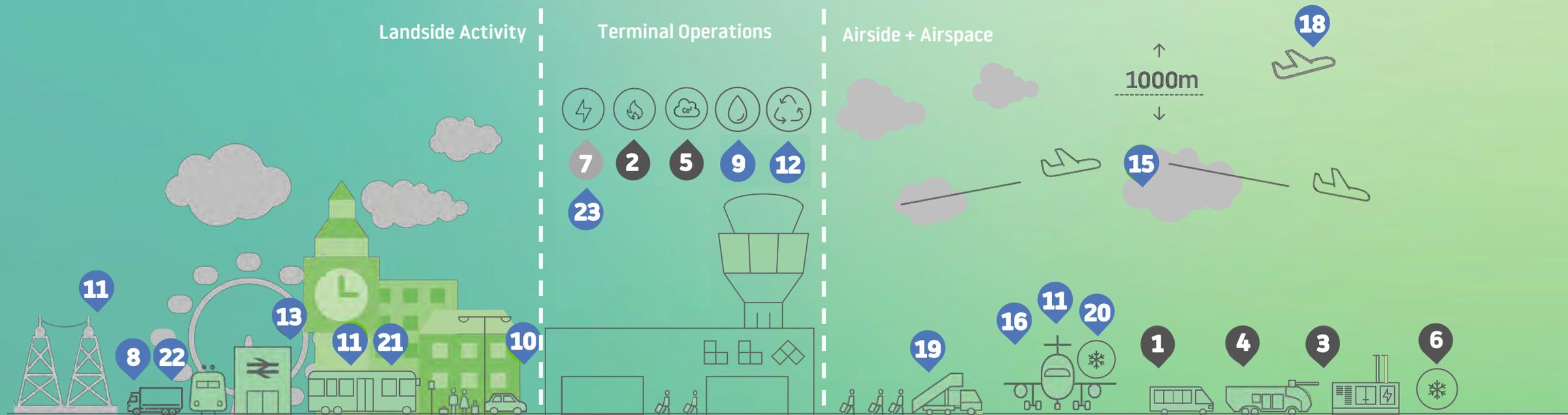
Our Airport Emissions

Scope 1 – Direct Emissions

Mobile Sources
1 LLAOL Operational Vehicles

Stationary Sources
2 Natural Gas – Heating + Boilers
3 Fuel – Heating + Power (Generators)
4 Firefighting Activities + Training

Process Emissions
5 Refrigerant Losses
6 Ground De-Icing

Scope 2 – Indirect Emissions

Purchased Electricity
7 LLAOL Electricity Usage

Our Partners Emissions

Scope 3 – Indirect Emissions

GHG Category 1
8 Supply Chain (inc. **Category 2** Capital Goods)
9 Water Consumption
10 Non-Road Construction Vehicles

GHG Category 3
11 WTT&T&D of Scope 1 and 2

GHG Category 5
12 Waste & Wastewater

GHG Category 6
13 LLAOL Business Travel

GHG Category 7
14 Employee Commuting

GHG Category 8
15 Aircraft LTO Cycle
16 Aircraft APU
17 Aircraft Engine Testing
18 Aircraft CCD
19 Third Party Operational Vehicles (GSE)
20 Aircraft De-Icing
21 Passenger & Tennant Staff Surface Access
22 Landside Cargo Transport

GHG Category 13
23 Third-Party Grid Electricity
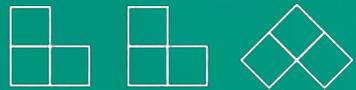
Carbon Management Highlights 2024

London Luton Airport

NET ZERO 2040
Our Airport Emissions (Scope 1&2)

28%
Reduction in Scope 1 & 2 emissions from our Net Zero baseline (2019)

↓ **0.34** kgco2e/PAX
LLA's lowest output

Driven by LLA's Net Zero roadmap interventions:

100%
Of LLAOL Car Parks
LED Operated

88%
Of LLAOL Fleet now
Low-Carbon

100%
Of LLAOL transfer buses
Low-Carbon

All electricity to LLA is **100%**
Renewably Sourced
Through REGO certification saving

3,844 tCo2e
under a market-based approach

With plans to generate 25% of airport electricity from
On-Site Solar
by the end of 2026

NET ZERO 2050
Our Partners Emissions (Scope 3)

Scope 3 breakdown

Aviation **88%**

Surface Access + Cargo Transport **10%**
Supply Chain **1%**
Other Scope 3 **1%**

36% ↓CO₂
of all flights operated in 2024 were
Next-Generation Aircraft

↗ 5% in 2019 & 27% in 2023

16,000+ tCo2e saved

Reducing our aircraft Emissions per passenger

9.5% reduction

LTO emissions - kgCO2e/PAX
10.5
10
9.5
9

2019   2023   2024

Passenger Surface Access
29% ↑ 6% vs 22

Staff Commute
27% ↑ 6% vs 22

Via sustainable mode
(rail, bus & coach)

With sustainable modes reducing carbon emissions by up to 87%

Minimising terminal operational carbon emissions

With managed recycling rate of
82%

In 2024, LLA's highest performance up from 60% in 2019

2024 Carbon Footprint Summary

All emissions have been calculated in line with the GHG protocol, to ACA Level 4 standards and ISO 14064-1. Outside of scope emissions have not been shown below, but account for 0.3% of emissions, reported for all fuels that contain a biofuel component. LLA reports in line with scope 1 & 2 reporting and the 15 categories of scope 3 as outlined in the GHG protocol standard. LLA reports to all applicable categories of scope 3, and continues to improve the scope of the footprint annually in line with standard and industry best practice.

1,221,916 tCO₂e/year
Location Based Emissions Figures (excl. outside of scope)

0.1%
Scope 1

0.3%
Scope 2

99.6% (74% CCD, 13% LTO)
Scope 3

Scope 1
1,920 tCO2e

Scope 2
3,844 tCO2e

Scope 3
1,216,152 tCO2e

Significant Scope 3 emission sources

Category 11 - Landside Cargo 1%

Category 1&2 - Purchased goods & Services (inc. Capital Goods) 1%

Category 11 - Ground Operational Vehicles 1%

Category 11 - Surface Access 9%

Category 11 - Aviation 88%

In 2024, LLA's largest emission sources remained within scope 3 of the carbon footprint, with the significant majority sourced from aviation related activities (including Cruise, Climb Decent (CCD), Landing-Take off (LTO) and APU usage).

LLA is working towards decarbonising all sources of carbon emissions including its scope 3 emissions, working closely with airport partners and the wider industry. LLA is a member of the Sustainable Aviation group, UK Jet Zero council and ACI's Net Zero 2050 pledge.

Expanded Reporting

Since 2019, LLA has continued to expand its scope of carbon footprint in line with updates to the ACA methodology and industry best practice. The footprint includes 5 additional emission sources including Aircraft CCD (74%), Supply Chain (1.2%), Well-To-Tank (0.1%), Landside Cargo Transport (1%) and tenant Staff commute (0.6%).

Many of these sources were calculated in 2023, but in 2024, these are now included in the full footprint of the airport.

Net Zero Roadmap

In 2022, London Luton Airport Operations Limited (LLAOL) introduced its Net Zero Roadmap to achieve net zero by 2040 at the latest for scope 1 and 2 airport operation emissions at London Luton Airport (LLA). Targeting a reduction of more than 90% in the airport's scope 1 & 2 emissions and resolving the residual emissions using carbon removals.

The Net Zero Roadmap uses a baseline from 2019, as the latest fully operational year at LLA with 18 million passengers, ensuring the airport highlights its true maximum output.

NET ZERO 2040
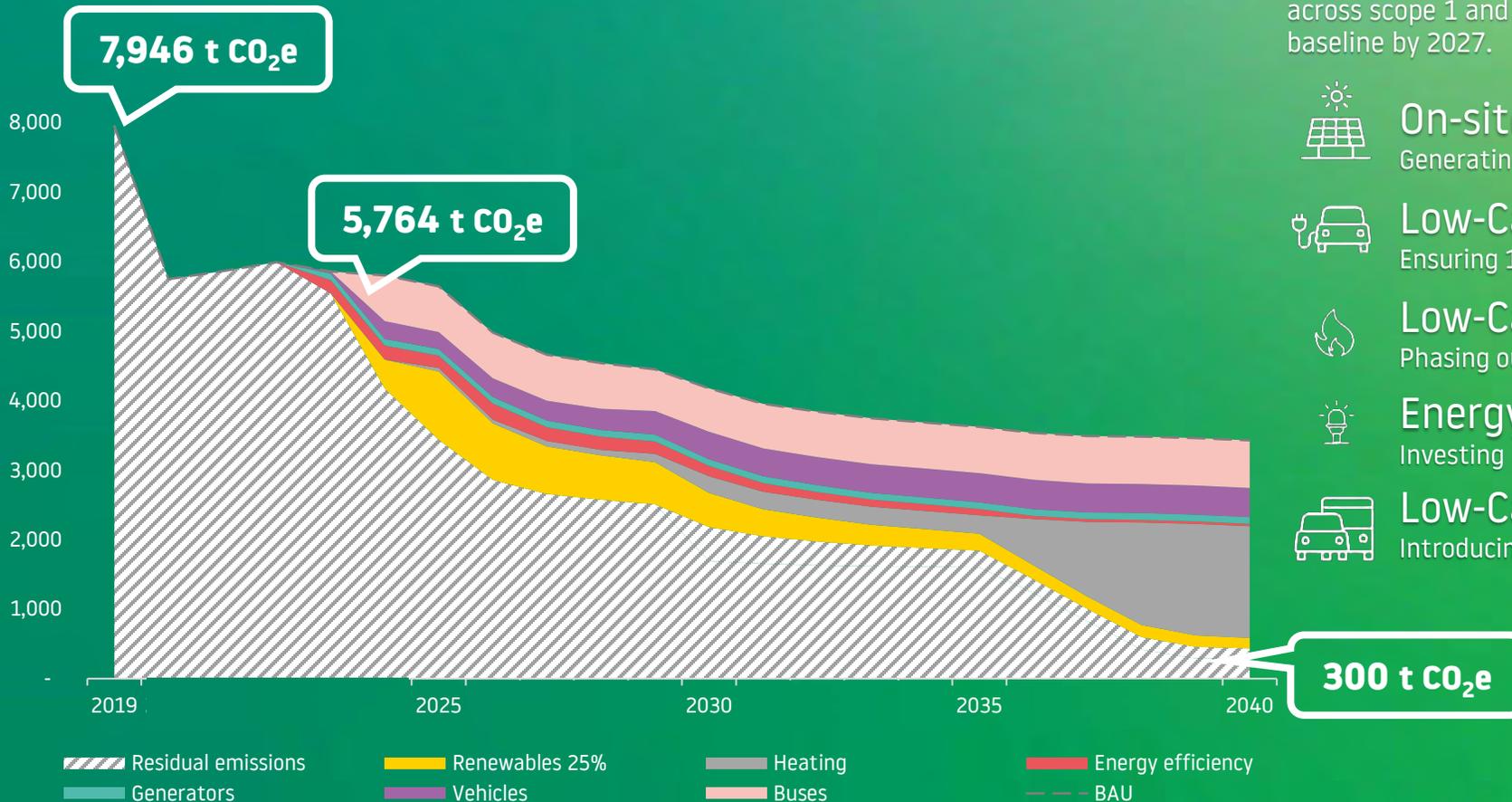
Using the following measures, LLA is reducing its emissions significantly across scope 1 and 2 sources, with the aim of having halved the original baseline by 2027.

On-site Solar
Generating 25% of LLAOL electricity requirement by the end of 2026

Low-Carbon Vehicles
Ensuring 100% of LLAOL fleet are low carbon by 2030

Low-Carbon Heating
Phasing our gas use across the airport by 2039

Energy Efficiency Upgrades
Investing in upgrades across lighting, systems and HVAC

Low-Carbon Buses
Introducing low carbon car park buses and exploring electric options

7,946 t CO$_2$e

5,764 t CO$_2$e

300 t CO$_2$e

Legend:
- Residual emissions
- Renewables 25%
- Heating
- Energy efficiency
- Generators
- Vehicles
- Buses
- BAU

Lowest Intensity Output

With successful implementation of LLA's Net Zero roadmap measures, in 2024 the airport saw the lowest scope 1 per passenger output at 0.11kgCO2e per passenger. Driven by key interventions such as energy efficiency upgrades on gas heating appliances, low-carbon vehicle transition and trialling HVO in airport generators.

A 31% reduction in passenger intensity from 2019, with passenger numbers also remaining 7% lower than LLA's operational baseline year – a clear demonstration of decarbonisation measures in practice.

Low-Carbon Vehicles

2024 saw the acceleration of LLA's low-carbon vehicle transition on all LLAOL operated vehicles and car park transfer buses, reducing emissions by 62% against the 2019 baseline.

Using a fleet transition mix of HVO and the introduction of electric vehicles across the fleet, LLA at the end of 2024 operated with 88% of the fleet being low-carbon. This significant decarbonisation measure is reducing scope 1 emissions, whilst transitioning to a fully electric fleet where feasible.

Scope 1 emission sources

- Operational vehicles (airport)
- Heating and generation
- Natural gas (airport)
- Fire training
- Refrigerant losses
- De-icing
- kgCo2e/PAX
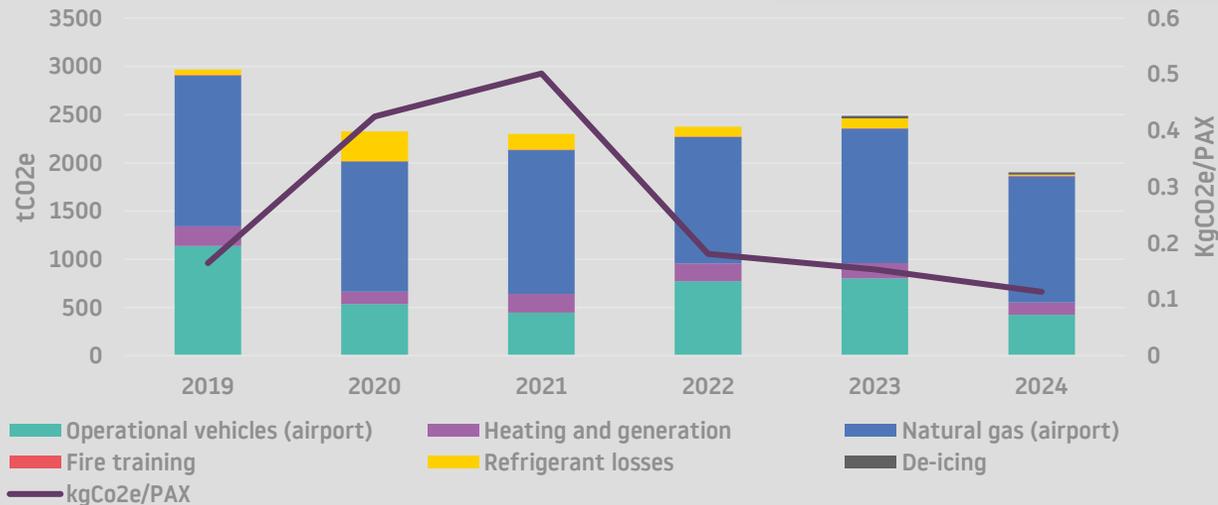
Our Airport Emissions
Scope 1

Reducing our direct control emissions sourced from LLAOL controlled mobile and stationary sources as well as process emissions from airport operational activities.

	2019	2020	2021	2022	2023	2024	Vs 2019 Baseline
Operational Vehicles (inc. CP Buses)	1,137	536	447	773	801	423	-62
Heating (Natural Gas)	1,562	1,349	1,492	1,307	1,393	1,306	-16%
Generators	203	129	192	184	158	149	-26%
Fire Training	8	2	6	6	5	10	+25%
Refrigerant Losses	55	309	162	102	103	8	-85%
De-Icing	-	-	-	-	25	13	-
Total	**2,966**	**2,326**	**2,299**	**2,373**	**2,486**	**1,920**	**-35%**

Material emissions

Our Airport Emissions
Scope 2

Reducing our indirect control emissions sourced from the use of grid electricity to power LLAOL operated buildings, equipment and systems across the airport, including airfield and external lighting.

	2019	2020	2021	2022	2023	2024	Vs 2019 Baseline
Location Based (tco2e)	4,981	3,418	3,538	4,045	4,091	3,844	-22%
Market Based (tco2e)	6,772	5,059	1,332	0	0	0	-100%
Total (Location Based)	4,981	3,418	3,538	4,045	4,091	3,844	-22%

Sourcing Renewable Energy

At LLA, electricity has been sourced from renewable energy sources since April 2021 through the REGO (Renewable Energy Guarantees of Origin) certification scheme. This ensures all electricity used directly by the airport and recharged to concessions is zero carbon under a market-based methodology.

This is a transitionary measure whilst we work towards installing our on-site solar farm, which is planned to generate c.25% of the airports direct electricity demands by 2026.

Energy Efficiency Investment

As part of LLA's commitment to Net Zero by 2040, energy efficiency measures across the airport site are being implemented.

In 2024, c.250 MWH was saved from the implementation of lighting upgrades across airport car parks and operated budlings, equating to around 50 tCO2e.

Further works are planned with lighting upgrades across the airfield and runway, and site-wide metering improvements to identify further opportunities.

Bar chart showing tCO2e (left axis, 0–8000) and MWH Consumption (right axis, 0–25000) for years 2019–2024.

Legend: Location Based - Scope 2 | Market Based - Scope 2 | LLOAL Consumption

GHG Protocol Categories

In line with the Corporate Value Chain (scope 3) Standard and supporting calculation guidance as well as ACA Level 4 guidance, LLA calculates its full scope 3 emissions against the 15 scope 3 categories.

Of the 15 categories, 9 emissions sources are in scope of LLA operations, with no activities undertaken in the remaining 6 categories including upstream transportation, processing of sold goods, franchise, investments, and upstream leased assets. This is in line with the guidance.

Goods & Services inc. Capital Goods

This category covers all LLAOL's spend based emissions. With 16% of these emissions coming from construction activities across site and a further 11% of these emissions originating from the investment in Next-Gen Security.

Capital emissions fell from a peak in 2023.

Surface Access

Passenger surface access emissions made up 8% of total emissions in 2024, with a further 1.1% from staff & tenant commuting (surface access).

The Luton DART saw 2.9m passengers in 2024 (Jan-Dec), with emissions per passenger around 80% lower than a car journey to central London.

Tenant staff commute covers airport pass holders who work on site at LLA. This was calculated for the first time in 2024.

Use of sold products

This category covers all aviation emissions (page 10), and the emissions from partner ground support equipment, surface access, aircraft de-icing and landside cargo transport (introduced in 2024).

This is our most significant emission category, and therefore working closely with all partners to reduce the emissions from these sources.

Business Travel

In 2024, we developed our internal business travel policy to provide guidance and influence to colleagues on business travel. Since the pandemic, these emissions have risen, but we are now looking to reduce and minimise these emissions.

Waste

In 2024, the methodology for waste emission reporting had been updated to reflect best practice. With the reporting of virgin material production emissions reported in category 1, the residual waste emissions from LLA waste only are then captured in category 5, where products have not been recycled.

Our Partner Emissions
Scope 3

Reducing our indirect emissions sourced from our partners activities across landside surface access, concession activities in the terminal and operations on the airfield and London Luton airspace. This also includes LLA's downstream activity emissions and supply chain.

	2019*	2020	2021	2022	2023*	2024
Category 1: Purchased goods and services	46	18	7	78	518	415
Category 1: Purchased goods and services, and Category 2: Capital goods	-	-	-	13549	23578	16659
Category 3: Fuel- and energy-related activities	790	527	2139	2102	1831	1720
Category 5: Waste generated in operations	140	980	786	2007	2658	39
Category 6: Business travel	103	39	4	101	68	178
Category 7: Employee commuting and home office	1,010	436	680	931	1,648	1,251
Category 11: Use of sold products	1,254,538	110,506	519,802	1,052,304	1,165,961	1,192,076
Category 12: End-of-life treatment of sold products	-	-	-	-	-	193
Category 13: Downstream leased assets	4,325	2,706	2,211	1,918	3,404	3,621
Total (Location Based)	1,260,952	115,212	525,629	1,072,990	1,199,666	1,216,152

*2019 & 2023 Carbon footprints have been adjusted in 2024 to account for new LTO + CCD methodology to reflect true taxi-in and taxi-out times in the LTO cycle, delivering a more robust and accurate carbon footprint output.

Aviation Emissions

Aviation accounts for over 85% of the total airport emissions output in 2024. LLA continues to work with Airline partners and the wider industry to influence the decarbonisation of this indirect emission source through engagement, innovation and research and operational procedures to ensure all carbon reduction opportunities are explored where feasible.

NEXT-GENERATION
Aircraft

AIRBUS A320neo **BOEING 737 MAX**

We are working with airlines to increase the use of Next-Generation Aircraft on passenger movements.

These modernised aircraft deliver carbon savings of up to 20% compared to the original models (CEO) and are currently one of the most significant decarbonisation measures being utilised in the industry through improved engine efficiencies and aero-dynamic enhancements to the fuselage.

Operational Improvements

As outlined in the Sustainable Aviation roadmap, there are carbon reduction opportunities from operational efficiency improvements which LLA is working with airlines and ground handler agents to implement.

These improvements can deliver up to a 5% reduction in carbon and include reduction in APU run time, taxi-practices and efficient climb and decent practices which we are continuing to enhance and monitor to maximise the opportunity.

Next-Gen Aircraft Proportion

↓CO$_2$
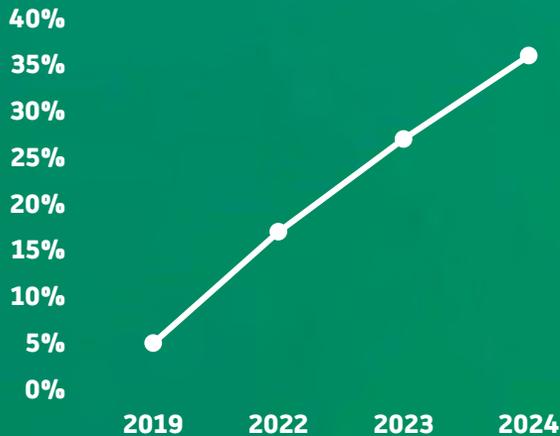
36% of all flights in 2024 were operated using a next-gen aircraft

Saving **16,913tco2e** in 2024

Co^2

	2019	2022	2023	2024

(Chart Y-axis: 0% to 40%)

Reducing Passenger intensities

LTO emissions - kgCO2e/PAX

(Y-axis: 8.8 to 10.6)

9.5% reduction

2019   2023   2024
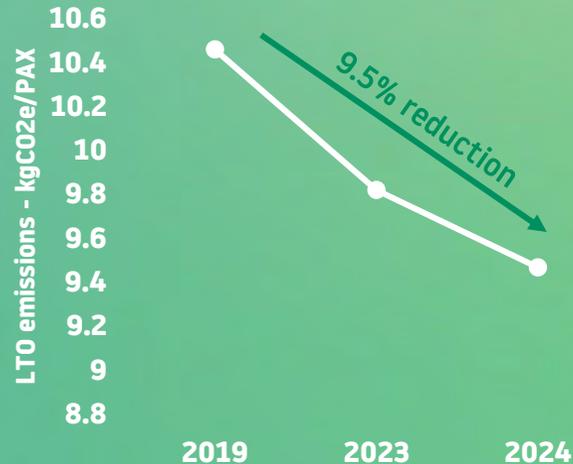
In line with our 2024 RBS, we are working to reduce aircraft carbon emissions per passenger by at least 5% by 2026.

Through a combination of measures and engagement points, we are reducing LTO emissions per passenger covering the aircraft operations on the ground and in Luton airspace (1000ft).

In 2024, passenger LTO emissions were 9.47 kgCO2e per passenger, a 9.5% reduction from 2019.

Carbon Footprint 2024 (Location Based)

Summary Category	ACA Category	tCo2e	tCo2	tCH4	tN2O
Scope 1 – Total		**1,920**	**1,871.28**	**2.09**	**7.99**
Mobile sources	Operational vehicles (airport)	423.25	411.18	0.05	5.46
Stationary sources	Heating and generation	148.93	146.88	0.04	1.89
	Natural gas (airport)	1,306.38	1,303.74	2	0.64
	Fire training	9.51	9.48	0.01	0.01
Process emissions	Refrigerant losses	8.47	0	0	0
	De-icing	23.04	0	0	0
Scope 2 – Total		**3,844**	**3,804.38**	**16.71**	**22.65**
Purchased electricity	Purchased electricity (airport)	3,843.74	3,804.38	16.71	22.65
Scope 3 – Total		**1,216,152**	**1,155,442.52**	**856.77**	**9,613.49**
Category 1: Purchased goods and services	Water consumption	21	0.00	0.00	0.00
	Non-road construction vehicles	394	312.67	0.04	4.15
Category 1: Purchased goods and services, and Category 2: Capital goods	Supply chain	16,659	0.00	0.00	0.00
Category 3: Fuel- and energy-related activities	WTT/T&D of scope 1 and 2	1,720	336.20	1.49	2.04
Category 5: Waste generated in operations	Waste	15	0.00	0.00	0.00
	Wastewater	24	0.00	0.00	0.00
Category 6: Business travel	Business travel	178	152.81	0.11	0.86
Category 7: Employee commuting and home office	Staff commute	1,251	976.29	2.27	2.42
Category 11: Use of sold products	Aircraft LTO and APU	158,448	157,017.36	109.47	1,321.08
	Aircraft CCD	883,875	875,894.68	610.50	7,369.41
	Aircraft engine testing	2,282	1,871.67	1.30	15.75
	Operational vehicles (third party)	3,625	2,877.63	0.38	37.92
	Aircraft de-icing	372	0.00	0.00	0.00
	Passenger surface access	120,046	94,487.04	101.08	633.60
	Tenant staff commute (new for 2024)	8,985	7,011.37	15.43	17.54
	Landside cargo transport (new for 2024)	14,443	11,430.06	1.79	189.38
Category 12: End-of-life treatment of sold products	MSCP decommissioning	193	139.92	0.02	1.86
Category 13: Downstream leased assets	Purchased electricity (tenant)	3,621	2,934.82	12.90	17.50
All Scopes Total (inc. outside of scopes)		**1,221,916**	**1,165,474**	**876**	**9,644**

2019 & 2023 Carbon footprints have been adjusted in 2024 to account for new LTO + CCD methodology to reflect true taxi-in and taxi-out times in the LTO cycle, delivering a more robust and accurate carbon footprint output.

Carbon Footprint – Historic Performance

Summary Category	ACA Category	2019*	2020	2021	2022	2023*	2024	% of Scope	% of Total Emissions
Scope 1 – Total		**2,966**	**2,326**	**2,299**	**2,373**	**2,486**	**1,920**		
Mobile sources	Operational vehicles (airport)	1,137	536	447	773	801	423	22%	0.03%
Stationary sources	Heating and generation	203	129	192	184	158	149	8%	0.01%
	Natural gas (airport)	1,562	1,349	1,492	1,307	1,393	1,306	68%	0.1%
	Fire training	8	2	6	6	5	10	0.5%	0.001%
Process emissions	Refrigerant losses	55	309	162	102	103	8	0.4%	0.001%
	De-icing	-	-	-	-	25	25	1%	0.001%
Scope 2 – Total		**4,981**	**3,418**	**3,538**	**4,045**	**4,091**	**3,844**		
Purchased electricity	Purchased electricity (airport)	4,981	3,418	3,538	4,045	4,091	3,844	100%	0.3%
Scope 3 – Total		**1,260,951**	**115,214**	**525,631**	**1,072,991**	**1,199,668**	**1,216,151**		
Category 1: Purchased goods and services	Water consumption	46	18	7	16	21	21	0%	0.001%
	Non-road construction vehicles	-	-	-	62	497	394	0%	0.03%
Category 1: Purchased goods and services, and Category 2: Capital goods	Supply chain	-	-	-	13,549	23,578	16,659	1%	1.2%
Category 3: Fuel- and energy-related activities	WTT/T&D of scope 1 and 2	790	527	2,139	2,102	1,831	1,720	0%	0.1%
Category 5: Waste generated in operations	Waste	50	945	774	1,979	2,635	15	0.0%	0.001%
	Wastewater	90	35	12	28	23	24	0%	0.002%
Category 6: Business travel	Business travel	103	39	4	101	68	178	0%	0.01%
Category 7: Employee commuting and home office	Staff commute	1,010	436	680	931	1,648	1,251	0%	0.09%
Category 11: Use of sold products	Aircraft LTO and APU	188,267	66,789	59,372	115,162	159,030	158,448	13%	13.3%
	Aircraft CCD	930,561	-	428,882	838,325	873,200	883,875	75%	74.0%
	Aircraft engine testing	608	266	85	1,832	2,157	2,282	0.2%	0.2%
	Operational vehicles (third party)	3,179	1,592	1,505	2,621	3,661	3,625	0%	0.3%
	Aircraft de-icing	-	-	101	188	502	372	0%	0.03%
	Passenger surface access	131,923	41,859	29,857	94,176	127,411	120,046	8%	8.3%
	Tenant staff commute (new for 2024)	-	-	-	-	-	8,985	1%	0.6%
	Landside cargo transport (new for 2024)	-	-	-	-	-	14,443	1%	1.0%
Category 12: End-of-life treatment of sold products	MSCP decommissioning	-	-	-	-	-	193	0.0%	0.01%
Category 13: Downstream leased assets	Purchased electricity (tenant)	4,325	2,706	2,211	1,918	3,404	3,621	0%	0.3%
All Scopes Total (excl. outside of scope)		**1,268,898**	**120,958**	**531,469**	**1,079,409**	**1,206,243**	**1,221,916**		

*2019 & 2023 Carbon footprints have been adjusted in 2024 to account for new LTO + CCD methodology to reflect true taxi-in and taxi-out times in the LTO cycle, delivering a more robust and accurate carbon footprint output.
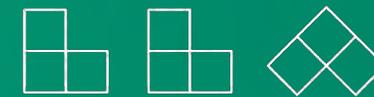
London Luton Airport

Carbon Reduction Strategy
Progress Update

Carbon Reduction Strategy

Theme	2024 Progress Update
Decarbonising our Operations	• Working towards this theme, LLA have planned on-site solar set to generate at least 25% of LLA electricity demand by the end of 2026 with planning permission not required following assessment of site requirements. In 2024, after six months of negotiation with our network partner, we reached an agreement in principle to proceed with the design development of our planned solar farm. Since April 2021, LLA has procured all electricity from renewable sources through the Renewable Guarantees of Origin (REGO) scheme. • As of 2024, 88% of LLA vehicles and buses are now low-carbon, operating on HVO or electric alternatives, reducing scope 1 emissions. Additionally, all landside leased car park transfer buses were replaced with new HVO fuelled buses, with airside "Cobuses" also transitioned onto HVO fuel. This is a transition measure as the airport moves to a fully-electric fleet where operationally feasible. • In 2024 we began trials of using HVO fuel in generators, reducing diesel consumption with results to be reviewed in 2025 to assess further LLA continues to upgrade its electrical and energy assets across the site in line with the site-wide energy audit conducted in 2022, whilst working with industry experts and operational teams to identify and implement further measures without impacting the requirement of the operation. In 2024, work was done to include a requirement for new suppliers to work proactively on energy efficiency and not just maintain the BMS (to be included in 2025 tenders). A feasibility study was also completed in 2022 on low carbon heating options, and a new boiler management system was installed in 2023 to ensure we only run the necessary number of boilers required for the operation. We are developing an internal refrigerant policy outlining the checks and best practice to be followed in line with relevant regulations to be implemented in 2025. New technologies explored in line with residual emissions review and continuous maintenance improvement. • LLA also began conducting a feasibility study in 2024 on potable and non-potable water usage across the site, with assessment of opportunities to substitute potable water sources, with a Water Use Plan to continue to be developed in 2025. • In 2024, LLA developed its internal business travel guidance and policy encouraging staff to consider virtual meetings where possible and use sustainable modes of transport for in personal meetings and events where feasible. • Recycling and landfill diversion have been at the core of LLA Waste management contracts since 2022, with record high recycling rates achieved and 100% diversion from landfill in 2024 from terminal and LLA managed waste. Work also continues to reduce per passenger waste output from LLA, alongside successful delivery of increased recycling rates with an average of 82% across 2024 on managed waste. • Looking forward to 2025, LLA is developing Construction Environmental Minimum Requirements to be incorporated into contractors SLA's to support the delivery of Responsible Business Strategy objectives.
Decarbonising the Ramp	• Working towards this theme, LLA engages with airlines on material shared goals such as SAF and objectives of the Jet Zero strategy, with references noted in the CCU and collaboration with local academia in 2024. LLA also collaborates with Government through forums such as Sustainable Aviation, Zero Emissions Flight Infrastructure Group and Sustainable Skies. In 2024, LLA signed a Memorandum of Understanding with Cranfield university which includes exploring research and operational feasibility studies on future flight supporting the goals of the Jet Zero strategy and Sustainable Aviation. • LLA also continues to work with airline partners through various mechanisms to increase the use of Next-Generation aircraft based and operating at LLA, with 60% of aircraft based at LLA in 2024 Next-Generation. • Introduced in 2017, GSE pooling has saved significant emissions from across the airfield from inefficient operations with enhanced use of telematics across the pooled fleet. In 2024, LLA continued to engage with airside operators and asset managers TCR to explore low-carbon fuel use and the trial of E-GSE equipment. • Additionally, LLA's main de-icing contractor uses forced air/blend to temperature techniques to reduce the amount of glycol required per Airframe, with the GlyVac units being used to collect residual fluid from de-icing locations across the airfield.

Carbon Reduction Strategy

Theme	2024 Progress Update
Reducing Noise Impact	• As set out in the Noise Action Plan, engagement with operators on ACOP and DCOP procedures took place throughout 2024, increasing the number of points of engagement with operators each year. Engagement with operators in regard to the use of delayed landing gear techniques also took place in 2024, with the introduction of monitoring systems where feasible. A full review of practices will be undertaken in 2025 and updated as part of the Noise Action Plan schedule. • LLA applies strict restrictions on engine testing, with time-based charging on engine testing and no engine testing taking place in 2024 during the restricted night period. • LLA also enforces an APU Use policy through the Operational Safety instructions to be followed by all airside users, which restricts usage to 30 minutes before departure and 5 minutes after arrival. LLA held ongoing engagement with operators throughout 2024 and are continuing to explore further mechanisms to reduce usage. • In regards to airspace modernisation, the Airspace Change Programme is currently delayed. The existing CAA/DfT methodology for airspace redesign has been deemed inadequate for the programme of this scale. The DfT through the CAA are expected to introduce a new UK Airspace Design Service aligned with the updated regulatory frameworks. This approach aims to enable faster and more effective airspace changes, with implementation expected from 2031 onwards.
Sustainable Surface Access	• In 2024, LLA published its new Airport Surface Access Strategy and associated travel plan, a full update of which can be found in the ASAS 2024 update on employee and passenger surface access. • Working towards the theme of sustainable surface access, LLA has developed an electric vehicle transition roadmap and charging strategy in collaboration with industry experts as we continue with the transition to electric operational vehicles. • Additionally, in 2024 LLA introduced the electric vehicle salary sacrifice scheme in partnership with Octopus energy, with over 40 employees signed up to the scheme. • We also continue to review current car parking and drop of charges and operations in line with in line with 2024 ASAS passenger requirements. • As of 2024, 126 taxis now hold a licence with Luton Council to use the taxi forecourt at LLA, with 43 of those being electric and eligible for discounted licensing rates for taxis with Euro 6 standard. • New contracts have also been implemented with Arriva Green Line and National Express to ensure a consistent use of Euro 6 coaches. LLA is currently exploring with coach operators a potential trial of electric coaches. • Clear signage has been installed across the terminal forecourt to enforce our "no idling" policy and support strict compliance with the potential of additional charges applied by the car parking management agency.
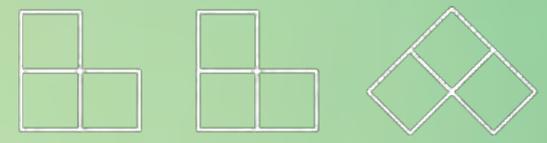
London Luton Airport

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LLA Travel Plan, Airport Surface Access Strategy and Car Park Management Plan

The following constitutes London Luton Airport Operations Limited's ("LLA") annual report for 2024 in respect of the operation of LLA's Travel Plan, Airport Surface Access Strategy and Car Park Management Plan in accordance with planning permission 21/00031/VARCON and the related s106 agreement dated 9 December 2022.

Purpose

The following constitutes London Luton Airport Operations Limited's ("LLA") annual report for 2024 in respect of the operation of LLA's Travel Plan, Airport Surface Access Strategy and Car Park Management Plan in accordance with planning permission 21/00031/VARCON and the related s106 agreement dated 9th December 2022.

LLAOL's Surface Access Development Manager also met with Luton Borough Council's Head of Transport Services and the Council's Independent Planning Consultant on 22nd April 2025 to provide an update on the targets outlined in this report.

Data Sources

Unless otherwise specified:
- Data regarding passenger travel is derived from the CAA Passenger Survey.
- Data regarding staff travel is derived from LLAOL's 2024 Staff Travel Survey; this was undertaken between 9th September 2024 and 14th October 2024 with a total of 1,402 respondents.

Summary

Passenger travel to/from LLA remains significantly impacted by the 2023 TCP1 fire in October 2023, which saw significant impacts on the airport's Central Terminal Area (CTA) and Mid-Stay Car Park operations.

As such, the airport saw an increase in passenger drop-offs of 8% year-on-year, and a subsequent reduction in public transport usage from 38% in 2023 to 29% in 2024. Temporary drop-off provisions will remain in place throughout 2025 until the re-opening of TCP1. LLAOL continues to monitor drop-off demand and CAA passenger mode share data. It is proposed by LLAOL that any continuing trends be discussed by the Airport Transport Forum (ATF) Steering Group in Summer 2025, including the identification of relevant mitigation measures.

Staff travel sustainable mode share has continued to rebound following the COVID-19 Pandemic. In 2024 staff travel by sustainable modes increased to 27% from 21% in 2022. LLA's Sustainable Travel Plan Coordinator has now implemented a 'business-as-usual' programme of works to continue to promote sustainable travel options to all airport staff.

Area	Progress
Air Quality	LLA's parking contractor APCOA include idling in their standard enforcement processes and can issue notices within the CTA to drivers of vehicles that idle.
Airport Transport Forum	A paper has been completed summarising options on reducing non-sustainable mode share which will contribute to LLA's ongoing analysis on considerations of potential mode-share interventions for implementation at the airport. LLA intends to discuss potential options at newly established ATF Steering Group.
	LLA engaged industry experts to review the operation of its ATF. The forum will be relaunched in 2025, including working groups to oversee development of individual modes; this will launch in June 2025.
	Membership of 15 organisations was achieved in 2024/25, up from 12 in 2023
Bus & Coach	LLA has worked with Arriva to promote the use of the Busway and local Luton services to the airport through targeted promotions, as well as the Employee Travel Club.
	LLA has undertaken viability studies on local bus demand, and regional bus/coach demand. These outputs were shared with LBC in January 2025. LLA is currently awaiting confirmation from LBC on the process for further collaboration to deliver additional network improvements. LLA has also engaged bilaterally with potential operators where interest has been shown.
	LLA has engaged with Arriva and Stagecoach to promote bus services to staff - this has included staff-specific promotional campaigns and exploring opportunities to co-brand local buses. LLA continues to work with both local operators to develop this area.
	LLA continues to facilitate discussions with both Arriva and National Express on fleet transition, including potential grid capacity requirements at the airport.
	LLA has worked closely with its coach operators to promote discounts on travel to LLA via the myLLA section of the website, including 'kids travel free' campaigns.
	LLA continues to develop its Surface Access Marketing Strategy for passengers which will inform targeting interventions in partnership with coach operators. Additionally, LLA has worked with National Express to deliver targeting coach wraps to promote coach travel between London and the airport.
	LLA has worked with Systra to complete an assessment of potential DRT demand and operating models in the Luton area. The results have been shared with potential operator, LBC and Luton Rising. LLA's Surface Access Development Manager has also led on meetings with LBC on this matter.
	LLA procured a new HVO fleet of Airport Campus Buses in 2024, which is now in operation.
	LLA has organised and attended several meetings with various operators, LBC, and Buckinghamshire Council to discuss potential bus route enhancements and funding opportunities. LLA will continue to engage with operators and local authorities to build business cases and unlock route enhancements.
Car Park Management Plan	LLA offers a discounted tariff for EVs for drop off / pick up located in TCP1 of £1 for 30 minutes (£11 for up to 30 minutes for non EVs).

	LLA is reviewing the EV charging strategy following the fire in TCP2. 10 electric chargers were removed from TCP1 in 2024 as a result due to potential fire risk. LLA is reviewing the best solution to rehouse these units in safer places around the estate.
	A new demand management system has been implemented and successfully forecasts the demand within car parks and sets prices accordingly. LLO car park revenue managers oversee the solution and monitor overall demand and prices.
Car Parking	LLA prepared and submitted its Car Park Management Plan to LBC in February 2024 and is now seeking to operate in accordance with this.
	LLA continues to discuss fly parking issues with LBC's Transport Team when raised via LLACC, and is willing to explore supporting additional CPZs on a case-by-case basis.
	LLA offers a discounted rate for car sharing within the Staff Car Park B and the Executive car park. There is ongoing work to promote this discount to staff, with the current rates being published in the LLA Charges and Conditions of Use document (CCU) each year.
	LLA continually monitors car parking occupancies.
Car Sharing	LLA undertook engagement on attitudes to lift-sharing as part of the 2024 Staff Travel Survey; this was also explored further through the FTVG-funded Staff Travel Barriers project. LLA is now in the process of engaging with companies that provide digital platforms for staff engagement, including lift-sharing products. It is expected that a new operator will be onboard by September 2025.
	For passengers, LLA is monitoring the provision of ridesharing and taxi-based solutions by the market. When a solution becomes available, LLA will look to promote taxi-sharing/ride-sharing to passengers and staff.
DART	LLA continues to promote the DART on its website and via rail partners to passengers, including through its collaboration with EMR and Luton Rising for the Luton Airport Express. For staff, LLA promotes the benefit of DART access and has a guidance document on how to obtain free DART tickets as an incentive.
	For staff, LLA promotes the benefit of DART access and has a guidance document on how to obtain free DART tickets as an incentive.
Engagement with LBC	LLA's Sustainable Travel Plan Coordinator partakes in LBC's Luton-wide Travel Plan Coordinator working group which has the principal aim of sharing knowledge and developing best practice on this. Car travel reduction is also embedded into regular catch-up discussions between LLA's Surface Access Development Manager and LBC. Such discussions focus on aligning with LTP5 objectives, identifying priority areas for improved walking, cycling and public transport access to the airport, coordinating joint staff engagement campaigns, and using travel data insights to support a shift away from single-occupancy car journeys.
	LLA continues to discuss potential ways to disincentivise car journeys at its regular meetings with LBC, transport operators and wider stakeholders. LLA's Surface Access Development Manager has also contributed to a series of workshops on LBC's new Local Transport Plan, providing input on reducing car journeys within the context of the ASAS and Luton's 2024 Vision. Additionally, it has shared the outputs of an Active Travel Audit with LBC which included potential interventions in this area. LLA would welcome further discussions with LBC on developing a programme of work for this.

	LLA has engaged with LBC and current and potential coach and bus operators to explore new routes including destinations in Buckinghamshire, Hertfordshire and London. LLA has worked with Systra to complete an assessment of potential DRT demand and operating models in the Luton area. The results have been shared with potential operators, LBC and Luton Rising. LLA's Surface Access Development Manager has also led on meetings with LBC on this matter.
EVs	Usage of available charge points is continually monitored via LLA's charge point provider.
	LLA continues to promote the use of EV charging (where available) to staff in the relevant locations. LLA administrative staff remind employees about the EV charging facilities and the priority parking for those with EVs. For passengers, LLA's Car Parking team are developing a product whereby an EV driver may be able to book a valet parking product, and their EV is charged whilst they are away. This product is planned to go live in 2025.
	LLA reviewed opportunities to implement additional EV charging points with VEV consultancy in May 2024. The outputs from this work continue to be used to scope EV opportunities on the airport campus.
	LLA currently offers preferential tariffs for EVs in TCP1 for both parking and drop-off.
	LLA reviewed opportunities to implement additional EV charging points with VEV consultancy in May 2024. The outputs from this review are currently being used for LLA's scoping on spare grid capacity and potential future interventions including LLA's future EV valet parking product.
	Following reviews of electricity availability and future demand planning, LLA will engage with operators as part of its scoping of the expansion of EV infrastructure at the airport.
	LLA's new salary sacrifice scheme exclusively offers EVs. By April 2025, 41 fully-electric vehicles had been purchased through the scheme by LLAOL employees.
	LLA continues to promote its EV salary sacrifice scheme to staff via its intranet site.
	LLA continues to regularly promote the use of EV chargers available to staff on the airport campus via internal communication channels. As the passenger-facing EVCPs have been decommissioned following a Charging Point risk assessment, the equivalent is still under review for passengers. Where public-facing EVCPs are reintroduced, LLA shall promote to passengers accordingly.
	LLA continues to engage with operators as part of its scoping of the expansion of EV infrastructure at the airport. This engagement will continue to feed into LLA's wider work on assessing current and future grid capacity for to scope EV charging requirements.
Rail	LLA has undertaken initial analysis of rail catchment and has commissioned a consultant to provide in-depth outputs to inform further steps, it is expected that these will be completed by June 2025. LLA will also seek to use these outputs to identify capacity opportunities with operators.
	LLA has engaged with GTR and EMR on promoting rail to staff within the operators' catchment areas. GTR have worked with LLA to undertake a 'try the train' campaign for staff living on the Thameslink route. Additionally, LLA has asked EMR to consider promotional discounts for staff who live within the catchment of EMR's services to/from the airport. LLA will continue to seek to engage with transport operators to promote rail to staff who live in the relevant catchment areas.

	LLA continues to lead on discussions with rail operators to introduce additional price incentives for rail passengers to/from the airport. LLA has continued to support EMR with its Luton Airport Express product which offers £10 fares to/from central London from LLA.
	LLA has worked with East West Rail to support the development of the route with the aim of maximising the benefits for passengers and staff. Additionally, LLA continues to work with EMR and Luton Rising on the continual growth and improvements of the Luton Airport Express and service improvements (eg. additional Luton Airport Express services)
	LLA has been working with Southeastern, EMR and GTR to expand the range of advance rail fares available to/from the airport, with a particular focus on routes from Kent via St Pancras.
Staff Engagement	LLA's Sustainable Travel Plan Coordinator has established the Staff Travel Working Group, meeting on a bi-annual basis. Discussions include improving staff commuting options, promoting sustainable travel modes, and evaluating initiatives to reduce environmental impact and support operational efficiency.
	LLA is promoting sustainable modes on a mode-by-mode basis; feedback from staff on barriers showed a preference to promoting relevant modes. Since implementation of the ASAS, staff campaigns for active travel, rail usage, and bus usage have been undertaken. Respectively, these have included the LLA/LBC Autumn Walking and Cycling Challenge, a Thameslink terminal pop-up, and seasonal promotions in partnership with Arriva and Stagecoach.
	LLA has fully implemented this and, as of March 2025, had 14 Staff Travel Champions. These champions represent a range of departments and on-site partners at the airport, including Commercial, Guest Experience, ID Unit, Procurement, Security, the Fire Station, Harrods Aviation, Ryanair, and the UK Home Office.
	LLA's Sustainable Travel Plan Coordinator has implemented a programme of BaU engagement with staff. LLA has also worked with the Future Transport Visions Group, securing funding to undertake 100 in-depth ethnographic interviews with staff from across the airport on barriers and perceptions of barriers to sustainable travel.
	LLA's Sustainable Travel Plan Coordinator has implemented a new Staff Travel Hub on LLAOL's intranet, prioritising sustainable travel information, discounts and services for staff.
Staff Travel Survey	LLA completed its latest Staff Travel Survey in September/October 2024 with a response rate of 14%. The survey was promoted through multiple channels, including Airport Management Notices, weekly newsletters, the Airport Community app, targeted emails, QR code T-shirts, and direct engagement with the Sustainable Travel Plan Coordinator.
	LLA offered prizes including the chance to win retail vouchers with Amazon and an iPad for staff who completed the survey and achieved a 14% participation in the staff travel survey as a result. From 2025, LLA will seek to expand discussions with new on-airport Food & Beverage operators to provide additional survey completion incentives.
Travel Discounts	LLA continues to promote third-party employee discounts via pop-ups and targeted internal communications led by its Sustainable Travel Plan Coordinator. It also continues to work with operators to implement additional discounts.
	LLA continually reviews incentives for staff travelling sustainably this is done on a mode-by-mode basis. Additionally, LLA is currently undertaking market engagement for a provider for a digital staff travel engagement platform which will include providing incentives for staff that travel sustainability. The provider should be onboarded by Summer 2025.

	LLA's Sustainable Travel Plan Coordinator now promotes the staff travelcard and assocaited discounts through BaU engagement and on digital staff channels, including Airport Management Notices, the Airport Community App, LLA intranet and staff gatekeeper emails.
	LLA has successfully secured long-standing staff bus discounts for airport with Arriva. Additionally, LLA has worked with both Arriva and Stagecoach to offer flash promotions including free bus travel to encourage staff to try travelling to/from the airport via bus.
	LLA has engaged with GTR and EMR on promoting rail to staff within the operators' catchment areas. GTR have worked with LLA to undertake a 'try the train' campaign for staff living on the Thameslink route; LLA has asked EMR to consider promotional discounts for staff who live within the catchment of EMR's services to/from the airport.
Travel Planning	LLA has now implemented personalised travel planning sessions for all airport staff who wish to take part, these are promoted and led by the Sustainable Travel Plan Coordinator through internal communication channels such as new starter sessions, 'Travel Tuesday' drop-in sessions, emails, and newsletters.
	LLA has implemented a 'new starter' Travel Pack covering sustainable travel options and staff travel discounts which goes to all new LLAOL staff and has been shared with third-parties for distribution. The Sustainable Travel Plan Coordinator also attends induction sessions to promote sustainable travel options.
	LLA has undertaken in-depth analysis into staff journey planning through its externally funded project with the Future Transport Visions Group. LLA is now exploring a digital staff engagement tool (including journey planning) and is currently in the market engagement phase with platform providers; it will engage with transport operators once a provider is secured, currently planned for Summer 2025.
	LLA's Sustainable Travel Plan Coordinator has implemented a new Staff Travel Hub on LLA's intranet, prioritising sustainable travel options and services for staff. Additionally, LLA is currently in the testing phase for improving Staff Travel information on its external website.
Walking & Cycling	Luton town and the surrounding areas are the priority cycling catchment for airport staff. LLA has collaborated with LBC on Autumn and Spring walking, cycling and active travel campaigns, including encouraging uptake from airport staff and providing incentives in the form of prizes.
	LLA has procured safe cycling merchandise (e.g. Hi vis slap wraps and cycle lights); these are now being distributed to staff through ongoing engagement from LLA's Sustainable Travel Plan Coordinator. In addition, the purchase of safety equipment will be included through LLA's new Cycle 2 Work provider, and a series of Dr Bike events have been implemented.
	LLA is currently procuring a new Cycle 2 Work scheme. The current Procurement timeline will see a Cycle 2 Work provider selected by LLA by the end of June 2025, after which, LLA will begin promoting the scheme to LLAOL staff via HR, Internal Comms, and the Sustainable Travel Plan Coordinator
	A series of safe cycling sessions and led cycle rides is currently in delivery for Summer 2025. It is envisaged that, once a new Cycle 2 Work supplier is onboard, these events and initiatives will be combined with the Cyle 2 Work programme.

	LLA continues to incorporate secure cycle parking provision into new buildings controlled and operated by LLA within the airport campus. With regards to retrospectively fitting secure cycle parking facilities, LLA's focus is currently on buildings that have been/are being significantly upgraded. Where such refurbishments are undertaken, LLA seeks to include secure cycle parking facilities into the design upgrade plans. As funding becomes available, LLA will look to install secure cycle parking facilities retrospectively on buildings that are not undergoing general refurbishment in the future.
	LLA has identified priority areas on the airport campus for the delivery of improved provision of shower and changing. As funding becomes available, LLA will look to install shower and changing facilities for LLAOL staff in these areas.
	Since March 2025, LLA has implemented a quarterly programme of Dr Bike events for staff on the airport campus.
	LLA commissioned an Active Travel audit in November 2024. These outputs were shared with LBC in February and March 2025 – LLA is currently awaiting review from LBC to identify opportunities for which to collaborate together on.
	LLA promotes walking to staff via identified staff channels including internal newsletters, emails and at departmental-specific events. Additionally, in collaboration with LBC, LLA has promoted and co-delivered seasonal walking challenges.
	LLA commissioned an Active Travel audit of the airport and its immediate vicinity in Autumn 2024. The outputs of this report have been shared with LBC; once LBC are ready, LLA would welcome an opportunity to establish next steps with LBC to improve cycling routes to/from the airport.
	Luton is the priority walking catchment for airport staff. LLA has collaborated with LBC on Autumn and Spring walking and active travel campaigns, including encouraging uptake from airport staff and providing incentives in the form of prizes.
Wayfinding & Information	LLA undertook in-depth analysis through external consultants Applied Information. The outputs of this will inform the scope of the airport's new Onward Travel Product, including digital and in-person journey planning; additionally, LLA has engaged with existing transport operators at the airport to inform the scope of this, and will continue to do so as it develops this new product.
	LLA's Digital team has completed a web experiment involving adding new tiles to the homepage for rail and coach options. They are now in the process of implementing these changes on a permanent basis; additionally, a broader UX redesign project began in April 2025, including requirements for Surface Access
	LLA continually reviews signage and recently implemented updated Onward Travel Wayfinding in the terminal and the CTA. (Note: routes and signage remain subject to change whilst the TCP2 rebuild continues). LLA is recently onboarded a new signage and wayfinding provider to deliver additional improvements at the airport.
	LLA provides live travel information for arriving passengers along the arrivals journey both airside and landside. From Summer 2024, digital information totems in the CTA for bus/coach travel passenger and timetable information were introduced.

In addition to the above, LLA's progress towards the five-year targets in the Travel Plan are set out below. It should be noted that LLA cannot directly control the achievement of the targets set out in this ASAS and Travel Plan, and they may not be achieved (particularly due to factors outside of LLA's control), but LLA aims at all times to use the measures set out in this ASAS and Travel Plan to help influence the achievement of each target.

Passenger Travel by Sustainable Modes (update to Travel Plan Table 4-1)

Year	Target	Actual Performance
2016	32%	32%
2019	34%	43%
2022	36%	34%
2023	36%	38%
2024	47%	29%
2028	47%	-

Passenger Travel by Bus and Coach (update to Travel Plan Table 4-2)

Year	Target	Actual Performance
2016	16%	16%
2019	-	22%
2022	17%	12%
2023	17%	16%
2024	22%	10%
2028	22%	-

Passenger Travel by Rail (update to Travel Plan Table 4-3)

Year	Target	Actual Performance
2016	16%	16%
2019	-	21%
2022	24%	23%
2023	24%	22%
2024	25%	19%
2028	25%	-

Employee Travel by Sustainable Modes (update to Travel Plan Table 4-4)

Year	Target	Actual Performance
2016	24%	24%
2019	26%	31%
2022	28%	21%
2024	35%	27%
2028	37%	-

Employee Travel by Bus and Coach (update to Travel Plan Table 4-5)

Year	Target	Actual Performance
2016	9%	9%
2019	-	16%
2022	11%	10%
2024	17%	16%
2028	18%	-

Employee Travel by Rail (update to Travel Plan Table 4-6)

Year	Target	Actual Performance
2016	7%	7%
2019	-	8%
2022	9%	6%
2024	10%	5%
2028	10%	-

Employee Travel by Cycle (update to Travel Plan Table 4-7)

Year	Target	Actual Performance
2016	-	2.4%
2019	-	1.7%
2022	-	1.7%
2024	3%	1%
2028	4%	-

Employee Walking (update to Travel Plan Table 4-8)

Year	Target	Actual Performance
2016	-	5.2%
2019	-	5.8%
2022	5%	2.8%
2024	3%	5%
2028	4%	-

Employee Cycle to Work Scheme Awareness (update to Travel Plan Table 4-9)

Year	Target	Actual Performance	
2016	71%	71%	
2019	-	46%	
2022	80%	80%	
2024	80%	30% (LLA-wide)	49% (LLAOL staff)
2028	85%		

Passenger Non-Electric Private Car Travel (update to Travel Plan Table 4-10)

Year	Target	Actual Performance
2016	51%	50%
2019	49%	40%
2022	43%	44%
2023	43%	42%
2024	40%	50%
2028	39%	-

Employee SOV Non-Electric Private Car Travel (update to Travel Plan Table 4-11)

Year	Target	Actual Performance
2016	68%	68%
2019	66%	59%
2022	64%	75%
2024	56%	73%
2028	53%	-

Employee Car Sharing Scheme Awareness (update to Travel Plan Table 4-12)

Year	Target	Actual Performance
2016	-	27%
2019	-	22%
2022	50%	n/a – scheme temporarily suspended
2024	50%	n/a – scheme temporarily suspended
2028	60%	-

LLA's Car Sharing Scheme was suspended during the Covid pandemic. In light of P19, the Surface Access team at LLA are currently undertaking the relevant procurement processes to onboard a new provider (see Travel Plan update MV5).

Staff Travel Survey Participation (update to Travel Plan Table 4-13)

Year	Target	Actual Performance
2016	10%	10%
2019	12%	9%
2022	12%	12%
2024	12%	14%
2028	12%	-

Airport Transport Forum Attendance (update to Travel Plan Table 4-14)

Year	Target	Actual Performance
2016	8	8
2019	10	10
2022	12	12
2023	12	12
2024	15	15
2028	15	-

Staff Discount Travelcard Awareness (update to Travel Plan Table 4-15)

Year	Target	Actual Performance
2016	53%	55%
2019	60%	60%
2022	65%	n/a*
2024	65%	n/a*
2028	70%	

*Staff Discount Travelcard Awareness was not measured in the 2022 and 2024 Staff Travel Surveys. It will be re-introduced to the survey from 2025 onwards

'

Appendix 1

This Appendix provides the data required under S106 Agreement (Schedule 7, Paragraph B) relating to the operation of the Updated Travel Plan and the Airport Surface Access Strategy. It presents key metrics and evidence to support LLA ongoing assessment and effort to a more sustainable surface access to and from the airport covering the period of 2024.

(a) Overall numbers of commercial air passengers using the Airport	16,735,984 in 2024
(b) Numbers and percentages of (i) staff and (ii) passengers travelling by car, bus, train and other modes of transport;	Please see detail earlier in the report for this data (note – data sets are weighted and stratified as per standard procedure to extrapolate mode share percentages)
(c) Assessment of the need for traffic counting equipment at road junctions and links on the approaches to the Airport and provision for a contribution by LLA towards the cost of installing such	LLA undertook 24 hour classified counts conducted at six locations on Thursday 12th September 2024:

equipment (if any);

Key:

🟥 Cordon count

The results of these were included in the Active Travel Audit shared with LBC via email on 3rd Feb 2025 and 7th March 2025. After a review of the cordon counts, along with continued BaU monitoring of Surface Access operations across the airport campus, LLA does not currently identify a need for any further counts.

(d) Usage of the short-term, mid-term and long-term public car parks under LLA's control including drop-off / 'kiss-and-fly' facilities including performance against any relevant measures in the car park management plan;	In 2024: Drop Off Zone – 610K transactions (3.65% Penetration) TCP1 Gate – 111K transactions (0.66% Penetration) Long Stay Gate – 47K transactions (0.28% Penetration) Mid Stay Gate – No data due to barriers remaining on 'keep open', due to the free drop off contingency measures established following the fire in TCP2. TCP1 Prebook – 95K transactions (0.57% Penetration) Mid Stay Prebook – 39K transactions (0.23% Penetration) Long Stay Prebook – 197K transactions (1.18% Penetration) Priority Parking (M&G) - 44K transactions (0.27% Penetration)
(e) Usage of staff car parking under LLA's control;	At the end of 2024, the number of discs issued to staff were:

At the end of 2024, the number of discs issued to staff were:

Car park B	1816
Car park B extension	276
Exec Car Park	153
Percival House/Car Park 7	158

(f) Passenger journeys by time of day;

Shown below is the breakdown of mode share by waves (the estimated arrival time at the terminal) for 2023-2025Q1.
- Private mode has a much higher share in the 1st (morning peak) and 3rd (evening) waves compared to the Second Wave. The drop-off shares increase significantly from 2023 to 2025 Q1 in both waves, in particular. Passengers preferred private car or Uber drop-offs over public transportation for morning and evening commutes.
- The 2nd wave still has a higher proportion of public transport users although the overall trend is shrinking.

(1) First Wave: 5:00 AM - 9:59 AM	2023	2024	2025Q1		(2) Second Wave: 10:00 AM - 3:59 PM	2023	2024	2025Q1		(3) Thrid Wave: 4:00 PM - 11:59 PM	2023	2024	2025Q1
Private	**71%**	**78%**	**87%**		**Private**	**57%**	**64%**	**62%**		**Private**	**54%**	**71%**	**77%**
Parking (Onsite)	18%	13%	14%		Parking (Onsite)	12%	11%	11%		Parking (Onsite)	9%	10%	12%
Parking (Offsite)	5%	10%	8%		Parking (Offsite)	6%	9%	5%		Parking (Offsite)	4%	10%	8%
Drop-off (Private Car)	29%	36%	40%		Drop-off (Private Car)	23%	28%	28%		Drop-off (Private Car)	25%	36%	40%
Drop-off (Taxi/Minicab)	14%	11%	12%		Drop-off (Taxi/Minicab)	10%	8%	9%		Drop-off (Taxi/Minicab)	9%	5%	4%
Drop-off (Uber)	4%	7%	13%		Drop-off (Uber)	4%	5%	7%		Drop-off (Uber)	4%	9%	12%
Rental car	1%	0%	1%		Rental car	2%	1%	1%		Rental car	2%	1%	1%
Walk/Cycle	0%	0%	0%		Walk/Cycle	0%	0%	0%		Walk/Cycle	0%	0%	0%
Others	0%	0%	0%		Others	0%	0%	1%		Others	0%	0%	0%
Public	**29%**	**22%**	**13%**		**Public**	**43%**	**36%**	**38%**		**Public**	**46%**	**29%**	**23%**
Bus/Coach	14%	10%	6%		Bus/Coach	17%	12%	16%		Bus/Coach	18%	7%	6%
Transist car/Shuttle bus/Rail	15%	12%	6%		Transist car/Shuttle bus/Rail	26%	24%	22%		Transist car/Shuttle bus/Rail	29%	22%	17%

(g) Passenger mode shares;	Please see detail earlier in the report for this data (note – datasets are weighted and stratified as per standard procedure to extrapolate mode share percentages)
(h) Passenger catchment area;	

(i)	Passenger car and taxi use;	Please see detail earlier in the report for this data (note – datasets are weighted and stratified as per standard procedure to extrapolate mode share percentages)
(j)	Staff journeys by time of day;	LLA undertook a survey of 1,402 staff traveling to the Airport in 2024. Those surveyed confirmed that they travelled to the Airport for the purposes of starting shifts at the following times of day:

Average Shift Start Time (by hour)
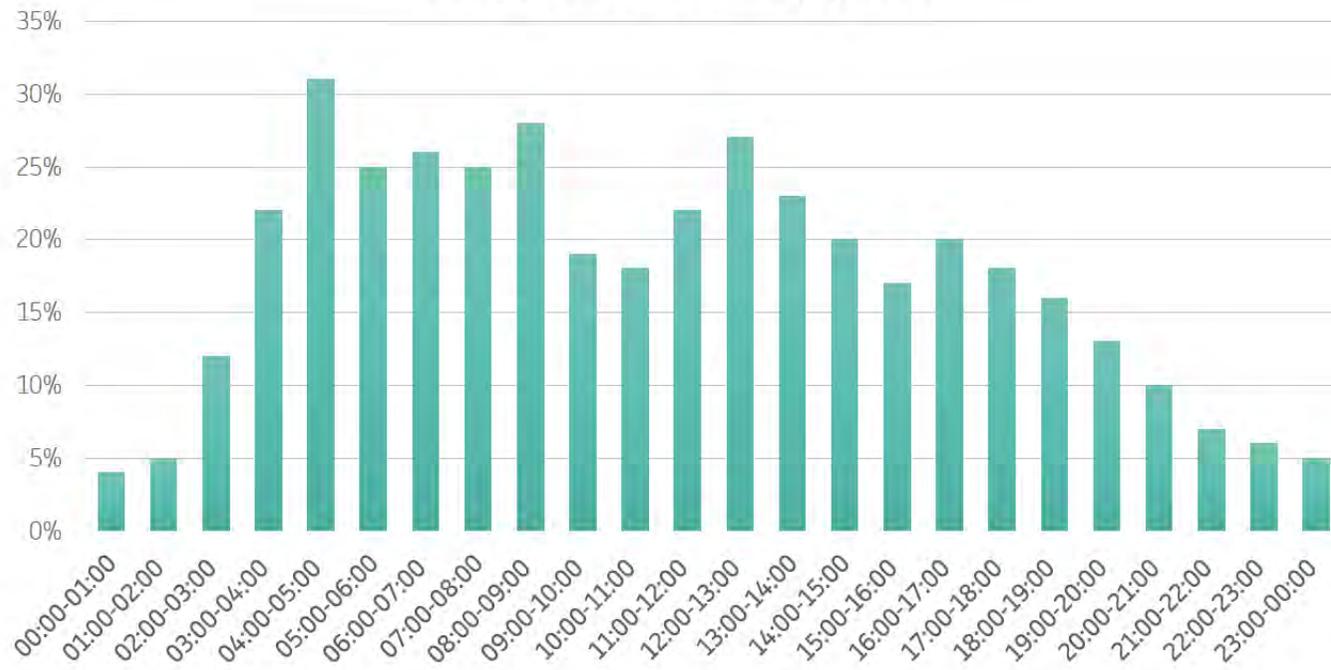
	Average Shift Finish Time (by hour) All data from LLA 2024 Staff Travel Survey	
(k) Staff mode shares;	Please see detail earlier in the report for this data (note – datasets are weighted and stratified as per standard procedure to extrapolate mode share percentages)	
(l) Staff catchment area;	The 2024 LLA Staff Travel Survey captured the following postcode data on staff catchment:	
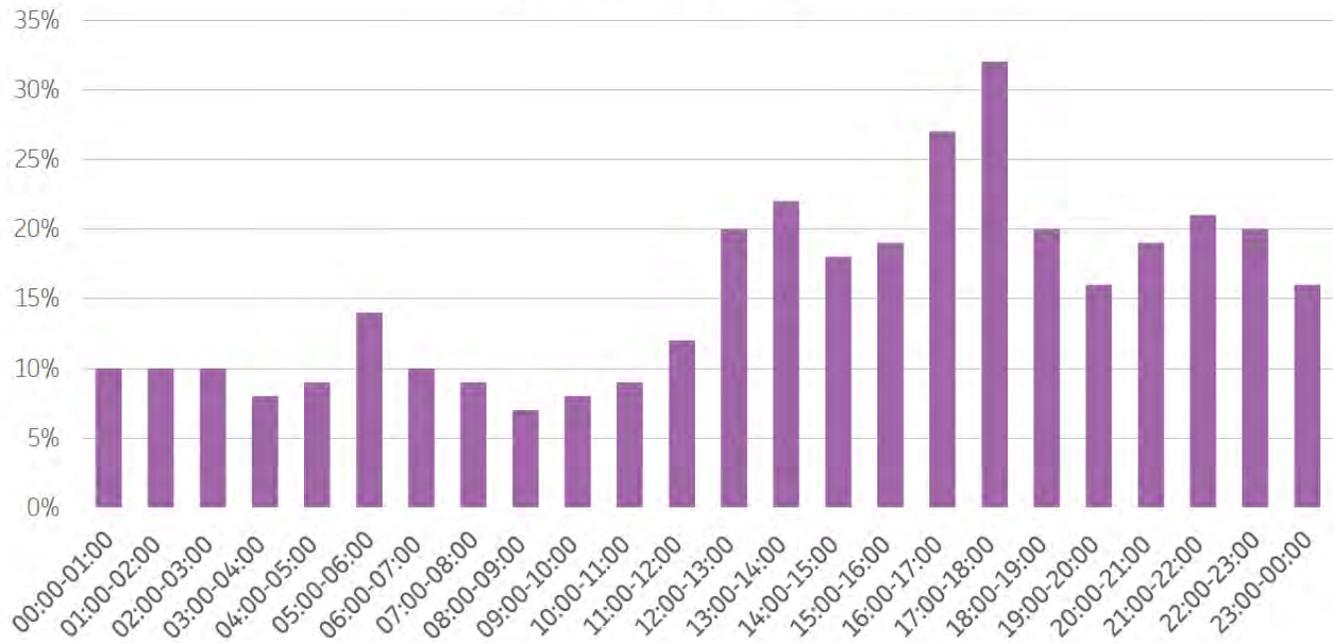
Postcode	Percentage (%)
LU	65%
MK	10%
SG	6%
AL	3%
HP	2%
CM	1%
NN	0.2%
NW	0.1%
GU	0.1%
SW	0.1%
TW	0.1%
UB	0.1%

Please also refer to point (h) on passenger catchment which is also applicable to staff.

(m) The activities of the Transport Forum and any other associated groups or forums relevant to surface access;	LLA has a specific obligation under P19 to operate (at its own expense) and work with members of the Airport Transport Forum to improve access to the airport by surface transport, including an annual forum to scrutinise the performance of the Airport against the Surface Access Strategy. The primary objectives: a) Provide input into ongoing implementation and development of the Airports Surface Access Strategy. b) Foster engagement and partnership between key stakeholders to enhance public transport and active travel to/from LLA. c) Oversee and monitor progress against Surface Access targets, ensuring improvements in sustainable transport options.

	d) Address collective transport challenges and work collaboratively with partners to unlock solutions and opportunities that increase sustainable transport to/from LLA. e) Ensure transparent communication with transport users and local communities regarding Surface Access developments. Activities from previous ATF: 1. Review of staff travel survey results, and staff travel as a whole. 2. Discussions on new bus services for staff and passengers. 3. Operational challenges and upcoming alterations, works and changes that impact concessionaires. 4. Successes, challenges and areas of improvement extended to new bus routes, EV initiatives, Dr Bike. 5. Sustainable mode share discussions / green initiatives, including new HVO car park buses for 2025. 6. Implementation of new coach concessions including targets for greener fleets. 7. Submission of the Airport Surface Access Strategy (ASAS) and Travel Plans. The ATF is subject to review and will be restructured to better fit the changing needs of the Airport and stakeholders.	
(n) Performance against actions and targets contained in the Updated Travel Plan	Please see detail earlier in the report for this data (note – datasets are weighted and stratified as per standard procedure to extrapolate mode share percentages)	

LLA Employment Skills and Recruitment Plan & Local Procurement Protocol

The following constitutes London Luton Airport Operations Limited's ("LLA") annual report for 2024 in respect of the effectiveness of its Employment Skills and Recruitment Plan & Local Procurement Protocol in accordance with planning permission 21/00031/VARCON and the related s106 agreement dated 9 December 2022.

The Employment Skills and Recruitment Plan

No.	Theme	2024 Progress Update
1.	Supporting Local Job Opportunities for Local People	LLA advertises the majority of its vacancies locally, including through the Luton Borough Council website, Luton Rising's social media and/or Luton Job Centre Plus following changes in the job market meaning that advertising in newspapers is no longer an effective means of communicating with local residents. They use mostly digital channels when searching for new jobs. This resulted in LLA moving its advertising primarily to online platforms such as LinkedIn, as well as LLA's, LBC's and Luton Rising's websites.
		Additionally, LLA actively advertises jobs at local community careers fairs as well as through the "Refer a Friend Scheme" referral scheme which is open to all LLA employees.
		LLA also participates in local careers fairs and targets recruitment of apprentices living in areas with an LU1-4 postcode, to provide opportunities for employment for the residents of Luton and surrounding areas.
		LLA holds its own recruitment fairs, which are available for residents to attend, and, when participating, shares information on external recruitment fairs to encourage attendance / collaboration by other Airport based companies.
		LLA works closely with preferred contractors where practical to ensure jobs are made available within the local area.
		LLA publicly tenders its construction works. The Tender Documents issued to interested bidders consists of specific questions about social value, including local jobs and apprenticeships.
		LLA does not advertise construction roles itself as LLA does not directly employ staff to carry out construction work.
		As construction works are contracted out, LLA actively works with its contractors to engage with local community schools and colleges to open opportunities for their career pathway and development. LLA encourages its contractors to advertise their job vacancies at Job Centre Plus, and on LLA's, LBC's and Luton Rising's Websites.

LLA Concessionaires are encouraged to utilise sections of LLA's website to advertise any vacancies they may have at the Airport.

Airport based companies are encouraged by LLA to use LLA's Excellence Academy to host events for their local recruitment campaigns and training. Equally, when LLA hosts such events, these companies and LLA's tenants are invited to participate.

LLA facilitates introductory calls to enhance relationships between recruiters and Airport businesses as well as providing them with guidance on how to recruit locally.

LLA issues Airport Manager Notice on a quarterly basis to guide Airport-based companies on their advertising campaign for job vacancies locally.

Additionally, LLA's procurement process includes a mandatory question asking bidders to demonstrate how they intend to create a positive social impact on the areas surrounding the Airport.

LLA issues press releases on wider Airport development/expansions. Additionally, potential recruits have open access to vacancies at LLA and a number of Airport businesses operating at the Airport through LLA's website / social media channels.

2.	**Early Careers and Apprenticeship Programmes**	2024 was dedicated to maturing LLA's partnership with Barnfield College and Central Bedfordshire College and re-designing and re-launching LLA's Apprenticeship Scheme.

LLA attends schools in Luton on an ongoing basis to share career/ education presentations. As part of LLA's Education Flagship Program, LLA visited 11 schools in 2024 encouraging young local people to consider careers in aviation, part of which could be through apprenticeship schemes.

LLA delivered education presentations at the Chiltern Academy for the Annual Luton Employability Day, put together by Reach Society, Generation Stevenage for local young people and delivered workshops as part of a Social Impact Scheme on topics like career start and development and how to best place themselves on the market.

650 people attended LLA's recruitment fair at Percival House followed by 750 attended a subsequent Recruitment Fair at the University of Bedfordshire. All these events were supported by Airport businesses and concessions.

LLA strongly encourages its appointed contractors to deliver a structured programme of apprenticeships and trainee opportunities as part of their commitment to workforce development. One of LLA's key contractors has offered both work experience for Barnfield College Students and apprenticeships in connection with LLA contracted construction works.

During LLA's regular meetings with its key contractors, topics such as the number of trainees and apprentices, and their appointments to job roles are discussed.

Due to the nature of employment opportunities at the Airport and how skills of residents are best developed for those roles, LLA employed one formal apprentice in 2024.

LLA focuses its training and skills development in a more impactful way by implementing job specific training programs which enable local residents, without suitable experience, to be recruited for vacancies at the Airport.

Foremost amongst those initiatives is LLA's security officer training scheme which enables local residents to obtain the skills necessary to undertake new roles in LLA's security department, which makes up the largest proportion of LLA's staff. Security staff are provided with structured training and a clear development pathway. LLA is also able to offer opportunities to some of these colleagues

in other parts of the business, which include further training and skills development opportunities, following the successful completion of their security training and development deliverables.

3. Training and career development	All mandatory and voluntary training are being recorded on LLA's training platforms as well as at departmental level.

Training development discussions take place during the annual objective settings and are recorded on LLA's internal systems.

To enable LLA's employees to achieve success during their employment with LLA, there are two programs available to sign up to:

1. The Core Skills Training Program is open to all LLA employees who want to build or develop a specific skillset. The program, offering a variety of courses, has been high in demand and is focused on gaining practical workplace and management skills.
2. The Impact Development Programme (IDP), launched with the core aim to offer junior colleagues the opportunity to develop their careers with LLA. The programme is underway with circa 60 delegates, almost half of whom are from local areas.

LLA attends schools in Luton on an ongoing basis to share career/ education presentations.

LLA delivered Essential Skills to 10 schools with Skills Builder in 2024.

LLA also presented at the Chiltern Academy for the annual Luton Employability Day put together as part of Reach Society's "Generation Stevenage" for local young people and delivered workshops as part of a social impact scheme on topics like career start and development and how to best place themselves on the market. Some of the workshops have been run in conjunction with airlines such as TUI & EasyJet.

LLA delivered education presentations at the Chiltern Academy for the Annual Luton Employability Day,

LLA organised workshops for residents locally as part of a Social Impact Scheme on topics such as career start and development.

LLA facilitates Work Experience Placements on an ongoing basis primarily for students between the ages of 14-16years.

There were 8 work experience placements through 2024.

Following LLA's successful working relationship through The Princess Trust Scheme, LLA has teamed up again with the Launch Group, a UK-based recruitment and training consultancy company offering commercial, pre-employment training programs and CSR to support job seekers into employment. These training courses run at LLA's Centre of Excellence training hub and are supported by the Luton Job Centre.

In its tender documents for new contracts LLA encourages suppliers and concessionaires at the Airport to implement similar obligations to those set out for LLA in the Employment Skills and Recruitment Plan.

LLA also issues Airport Management Notices to suppliers and concessionaires offering them the opportunity to advertise their vacancies on LLA's website and attend local job fairs organised by LLA.

LLA works with the Launch Group, a UK-based recruitment and training consultancy company to offer pre-employment training programs and CSR to support job seekers into employment. This also facilitates cross-operator working between LLA's larger airlines and a handling agent. The training courses are run at LLA's Centre of Excellence training hub and are supported by Luton Job Centre.

| 4. | Local Employee Promotion and Success Stories | LLA promotes success stories and publicises course attendance internally on a weekly basis in LLA's internal newsletter. LLA also promotes these on online platforms such as LinkedIn and LLA's corporate careers website. The latter also holds testimonials of colleagues who have successfully built their careers within LLA. |

LLA encourages all Airport employees and third parties to recognise colleagues via the Airport Community App, our recognition app, when they go above and beyond or contribute to LLA's success. All nominations for employee recognition are shared in LLA's weekly internal newsletter with the rest of the business.

To enable LLA's employees to achieve these success stories during their employment with LLA, there are 2 programs available for them to sign up to.

1. The Core Skills Training Program is open to all LLA employees who want to build or develop a specific skillset. The program, offering a variety of courses, has been high in demand and is focused on gaining practical workplace and management skills.
2. The Impact Development Programme (IDP), launched with the core aim to offer junior colleagues the opportunity to develop their careers with LLA.

LLA shares promotions and success stories on social media platforms such as LinkedIn, and LBC's, LLA's and Luton Rising's websites. LLA's website also holds testimonials from colleagues who have successfully built their careers with LLA.

LLA promotes success stories on a weekly basis in LLA's internal newsletter.

LLA encourages all Airport employees and third parties to recognise colleagues via the "Airport Community App", LLA's recognition app, when they go above and beyond or contribute to LLA's success. All nominations for employee recognition are shared in LLA's weekly internal newsletter with the rest of the business.

5.	Promotion of sustainable mode shares for both LLA Staff and Passengers	LLA offers "cycle to work" and staff travel discounts to make the Airport accessible in a more sustainable manner. Related policies and information are available to all staff on our internal website, the LLA Hub, which is shared with new starters as part of their introductory pack.

LLA provides the opportunity for personalised 1-2-1 travel planning sessions for interested staff led by LLA's Sustainable Travel Plan Coordinator.

LLA promotes discounted rail travel provided by East Midlands Rail and Thames Link and free DART travel offers to staff which are provided by its key partners, including Luton Rising along with discounted bus and coach travel offered by various providers such as Arriva, Centre Bus, National Express, Greenline and Stagecoach.

LLA has also been conducting targeted promotional campaigns for staff on the use of public transport.

Local Procurement Protocol

No	Theme	2024 Updates
1.	Strengthening relationships with local suppliers	LLA has continued to build strong, collaborative relationships with key local contractors through monthly project progress meetings. These sessions include discussions on current work, future opportunities and ways to broaden the scope for local supplier engagement. LLA's key partners, such as Ryebridge and Maplebrooke, regularly share updates on their own use of local businesses, helping LLA identify new potential suppliers and opportunities to expand local involvement in its supply chain. This engagement also allows LLA to consider inviting those local businesses to tender directly where appropriate.
2.	Enhancing visibility and transparency in tendering	LLA maintains regular reporting of tender activity through its Procurement Committee and sustainability reporting channels. This process tracks supplier interest and bidding outcomes, highlighting local participation. Local companies are clearly identified within this framework, in line with procurement regulations. Tender evaluations are formally reviewed every two weeks, summarising the level of market interest and outcomes for each opportunity. This monitoring ensures visibility and transparency around local supplier engagement. LLA also includes summaries of local tendering activity in formal reports to the local authority and in the Annual Sustainability Report.
3.	Expanding access through engagement and tools	LLA continues to host supplier engagement events such as "Meet the Buyer" sessions, which offer practical guidance to local businesses on accessing airport opportunities. These events are supported by partners including the local authority, business chambers and universities. Alongside these activities, LLA's e-procurement portal is used to promote opportunities and maintain a database of supplier capabilities, supporting ongoing efforts to improve local supplier understanding and access.
4.	Embedding local procurement in everyday practice	LLA actively encourages local supplier inclusion in procurement processes. The procurement team Category Manager has nominated to promote local procurement. LLA uses the procurement system Jaggaer as a data base of our suppliers which includes their capabilities and identifies if they are local. The procurement pipeline is used to map upcoming spend/tenders with potential local suppliers.

Where feasible, quotes are sought from local businesses for relevant procurements and successful suppliers are prompted to consider local sourcing as part of their delivery. Procurement documentation reflects this expectation. For tenders above £100k, opportunities are publicly advertised and visible to any registered supplier, including those locally based.

Tender documents also include encouraged behaviours around local sourcing, and LLA's award letter process includes a questionnaire that asks successful suppliers to confirm how they intend to work with local businesses. These practices support LLA's broader objective to embed local procurement considerations into the core of its purchasing activity.

As a result of these efforts, 60% of LLA's supply chain spend in 2024 was with businesses located within a 25-mile radius of the airport.

GRI Index

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 reported and where we have provided partial information. We have also referenced the data codes for key metrics set out in the Environment, Social and Governance Performance Data section.

Key					
Y	Reported	P	Partially reported	N	Not reported

Disclosure	Reported	Page number	Data code
GRI 2: General Disclosures 2021			
2-1 Organizational details	Y	6	
2-2 Entities included in the organization's sustainability reporting	Y	6	
2-3 Reporting period, frequency and contact point	Y	11,98	
2-4 Restatements of information	N	-	
2-5 External assurance	N	-	
2-6 Activities, value chain and other business relationships	Y	9, 14, 34-59	
2-7 Employees	Y	95	S-HRP-12
2-8 Workers who are not employees	P	95	S-HRP-13
2-9 Governance structure and composition	Y	79	
2-10 Nomination and selection of the highest governance body	N	-	
2-11 Chair of the highest governance body	Y	78	
2-12 Role of the highest governance body in overseeing the management of impacts	Y	78	
2-13 Delegation of responsibility for managing impacts	Y	78	
2-14 Role of the highest governance body in sustainability reporting	Y	78-81	
2-15 Conflicts of interest	N	-	
2-16 Communication of critical concerns	N	-	
2-17 Collective knowledge of the highest governance body	P	76-79	
2-18 Evaluation of the performance of the highest governance body	N	-	
2-19 Remuneration policies	N	-	
2-20 Process to determine remuneration	P	78	
2-21 Annual total compensation ratio	N	-	
2-22 Statement on sustainable development strategy	Y	14	
2-23 Policy commitments	Y	59, 69, 78-79	
2-24 Embedding policy commitments	Y	15, 18, 36, 52, 66	
2-25 Processes to remediate negative impacts	P	67, 95	S-HRP-22
2-26 Mechanisms for seeking advice and raising concerns	P	57, 69	
2-27 Compliance with laws and regulations	P	57, 60, 74, 82, 96	S-GXE-8
2-28 Membership associations	Y	19, 81	
2-29 Approach to stakeholder engagement	Y	30, 40, 44, 47, 57, 59, 69, 96	S-SPY-12
2-30 Collective bargaining agreements	N	-	

Disclosure	Reported	Page number	Data code
GRI 3: Material Topics 2021			
3-1 Process to determine material topics	P	6, 14	
3-2 List of material topics	Y	14	
3-3 Management of material topics	Y	14-82	
GRI 201: Economic Performance 2016			
201-1 Direct economic value generated and distributed	P	4-5, 7, 9, 50, 93	S-HRP-20, G-FIN-1, G-FIN-2
201-2 Financial implications and other risks and opportunities due to climate change	P	58-59, 78, 83	
201-3 Defined benefit plan obligations and other retirement plans	P	67, 69-73, 81	
201-4 Financial assistance received from government	P	5	
GRI 202: Market Presence 2016			
202-1 Ratios of standard entry level wage by gender compared to local minimum wage	N	-	
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	P	16, 40, 44, 96, 97	G-FIN-2, S-SPY-3
203-2 Significant indirect economic impacts	Y	51, 58	
GRI 204: Procurement Practices 2016			
204-1 Proportion of spending on local suppliers	Y	58, 96	S-SPY-7, S-SPY-11
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	P	28-29, 92	E-WST-9, E-WST-1, E-WST-2
301-2 Recycled input materials used	P	28-29, 92	E-WST-3
301-3 Reclaimed products and their packaging materials	N	-	
GRI 302: Energy 2016			
302-1 Energy consumption within the organization	Y	23-27, 88	E-CRB-1, E-CRB-2
302-2 Energy consumption outside of the organization	Y	23-27, 88	E-CRB-3
302-3 Energy intensity	Y	26, 90	E-ENR-10
302-4 Reduction of energy consumption	Y	26	
302-5 Reductions in energy requirements of products and services	Y	26	

Disclosure	Reported	Page number	Data code
GRI 303: Water and Effluents 2018			
303-1 Interactions with water as a shared resource	Y	32, 91	E-WTR-2
303-2 Management of water discharge-related impacts	P	18, 32	
303-3 Water withdrawal	Y	32, 91	E-WTR-1
303-4 Water discharge	P	91	E-WTR-2
303-5 Water consumption	Y	32, 91	E-WTR-2
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	54, 63	
304-2 Significant impacts of activities, products and services on biodiversity	P	63, 92	E-BIO-1, E-BIO-2
304-3 Habitats protected or restored	P	56, 63	
304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	N	-	
GRI 305: Emissions 2016			
305-1 Direct (Scope 1) GHG emissions	Y	20, 88	E-CRB-1
305-2 Energy indirect (Scope 2) GHG emissions	Y	25, 88	E-CRB-2
305-3 Other indirect (Scope 3) GHG emissions	Y	25, 88	E-CRB-3
305-4 GHG emissions intensity	Y	20	
305-5 Reduction of GHG emissions	Y	19-27	
305-6 Emissions of ozone-depleting substances (ODS)	N	-	
305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	P	40, 89	E-CRB-4.1
GRI 306: Waste 2020			
306-1 Waste generation and significant waste-related impacts	Y	54-56, 88, 92	E-WST-9, E-CRB-3.5.1
306-2 Management of significant waste-related impacts	Y	28-30	
306-3 Waste generated	Y	29, 92	E-WST-9
306-4 Waste diverted from disposal	Y	29, 92	E-WST-3, E-WST-4
306-5 Waste directed to disposal	Y	29, 92	E-WST-6
GRI 308: Supplier Environmental Assessment 2016			
308-1 New suppliers that were screened using environmental criteria	P	58-59	
308-2 Negative environmental impacts in the supply chain and actions taken	P	58-59	
GRI 401: Employment 2016			
401-1 New employee hires and employee turnover	P	95	S-HRP-14
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	P	68-69	
401-3 Parental leave	N	-	
GRI 402: Labor/Management Relations 2016			
402-1 Minimum notice periods regarding operational changes	N	-	

Disclosure	Reported	Page number	Data code
GRI 403: Occupational Health and Safety 2018			
403-1 Occupational health and safety management system	Y	71-74	
403-2 Hazard identification, risk assessment, and incident investigation	P	74	
403-3 Occupational health services	P	72-74	
403-4 Worker participation, consultation, and communication on occupational health and safety	Y	71-73	
403-5 Worker training on occupational health and safety	Y	72	
403-6 Promotion of worker health	Y	73	
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Y	71-74	
403-8 Workers covered by an occupational health and safety management system	P	72-74	
403-9 Work-related injuries	P	74, 94	S-HSE-6
403-10 Work-related ill health	P	71	
GRI 404: Training and Education 2016			
404-1 Average hours of training per year per employee	P	65-67, 94	S-HRP-7
404-2 Programs for upgrading employee skills and transition assistance programs	P	65-67, 94	S-HRP-1
404-3 Percentage of employees receiving regular performance and career development reviews	P	68, 94	S-HRP-1
GRI 405: Diversity and Equal Opportunity 2016			
405-1 Diversity of governance bodies and employees	P	69	
405-2 Ratio of basic salary and remuneration of women to men	P	95	S-HRP-34
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	7, 53-57, 93	S-COM-9
413-2 Operations with significant actual and potential negative impacts on local communities	P	4-5, 57, 60	
GRI 414: Supplier Social Assessment 2016			
414-1 New suppliers that were screened using social criteria	P	58-59	
414-2 Negative social impacts in the supply chain and actions taken	P	58-59	
GRI 415: Public Policy 2016			
415-1 Political contributions	N	-	

Disclosure	Reported	Page number	Data code
GRI 416: Customer Health and Safety 2016			
416-1 Assessment of the health and safety impacts of product and service categories	P	71-74, 94	S-HSE-17
416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	P	74	
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	N	-	

FURTHER INFORMATION

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