

# London Luton Airport Interim ASAS - Consultation Summary

This table summarises responses received during the public consultation on London Luton Airport's proposed Interim Airport Surface Access Strategy (ASAS), conducted between 24th December 2008 and 27th February 2009. A response to each proposal is included, and any subsequent action taken to address this concern or comment noted.

Following this consultation, and a subsequent meeting of the Airport Transport Forum, a final Interim ASAS was compiled for adoption.

Section	Consultee Comment	Revision (April 2009)	Reference code
General Comments	Uncertainty expressed on meaning of 'sustainable access'. Greater incentives to use public transport needed.	Additional comments on bus initiatives have been included	ASAS_4
	Greater engagement with airport employers needed if a modal shift is to be achieved.	Reference included to consideration of travel plan mechanisms, which would promote employer engagement	ASAS_13
	All data that is quoted needs to be fully referenced	Data referenced accordingly, source quoted for transport frequencies	ASAS_26
	Questioned whether London Luton Airport (LLA) charges for the use of the long stay shuttle bus	Not at present. Noted, no change	ASAS_27
	Numbers for monitoring need to be specified	KPI included for future monitoring	ASAS_30
	B653 (Lower Harpenden Road) is not suitable for heavy traffic, being narrow and twisty. Consultee asked if route could be omitted from the access maps used by the airport and businesses established at the airport to discourage additional use of the road?	(London Luton Airport Operations Ltd) LLAOL to refer to Herts CC. No change	ASAS_37
	The draft ASAS does not include consideration of whether steps can be taken to reduce the amount of freight traffic going to and from the airport by road.	Low volume of air freight through LLA means this is not such a significant component as other major airports; steps to reduce freight movements would be considered as part of a Travel Plan - for future consideration; No change	ASAS_43
	Supports general thrust of the draft ASAS	Noted, no change	ASAS_56
	Concerned that little or no mention of North Hertfordshire district in draft ASAS despite ~15% of staff and passengers passing through the area	Employee and staff travel trends are presented in the draft ASAS according to CAA data and LLA staff surveys. No change	ASAS_57
	Draft ASAS exhibits most of "minimum" requirements for ASAS, but lacks many needed for "good" ASAS documents	The revised ASAS now displays the majority of characteristics deemed to reflect a 'good' ASAS. Requirements from ASAS guidance document are included in the revised document.	ASAS_66
	Increased use of the airport to 2030 (DfT projections of 15 mppa) would lead to some 7,500 extra private car trips by passengers per day.	Noted, although the Interim ASAS covers the period 2008-2011. No change	ASAS_95
Chapter 1 - Introduction	The draft ASAS does not cover a 5 year period	Text added to highlight Interim ASAS designed to re-align with Local Transport Plan (LTP); revised document in 2011	ASAS_39
	Time period for the ASAS should be longer than 2011	Text added to highlight Interim ASAS designed to re-align with LTP; revised document in 2011	ASAS_86
Chapter 2 - Vision	An extra penultimate bullet should be added to read "identify specific actions needed to encourage the greater use of public transport"	Bullet point added	ASAS_24
	Expressed difficulty extracting an express objective for the ASAS	Objectives are contained in Vision. No change	ASAS_47
Chapter 3 - Policy Context	No Comments received		-
Chapter 4 - London Luton Airport Today	The report should make clear whether staff from all companies were surveyed or just LLA employees. The return should also be stated	The survey was distributed to all companies at the airport. Around 1000 responses collected. Note included in appendix specifying this information.	ASAS_75
	a) Most of the data presented in the ASAS is in percentages. Raw data would be more useful as a basis on which to form an opinion of targets b) It is presumed that train travel is a preferred option. However, the trains are currently poorly configured, overcrowded, expensive and the Luton - Gatwick trains have no space for luggage. Passengers also have to pay for the shuttle bus from LAP station.	a) Absolute values are now included b) Interim ASAS makes reference to Thameslink Programme, which will improve rail accessibility to Luton Airport Parkway station. No change	ASAS_1
	General agreement that LLA's targets are sufficient to ensure the ASAS achieves more sustainable surface access. However, it is difficult to know because of the way data is presented. For example, the ASAS presents the proportion of car users being reduced yet a graph (not specified) shows the absolute number increasing	Absolute values are now included	ASAS_3
	The figure of 500% must be an error. The July 2000 ASAS must have used the 1999 passenger throughput of 5.25mppa therefore it is suggested the ASAS should refer to "an almost doubling"	Noted. Text has been changed accordingly to 61% increase.	ASAS_22
	There are not enough overseas-based aircraft to balance the use of airport and public transport capacity. Luton needs to attract overseas carriers as overseas passengers are more likely to use public transport	Noted, no change	ASAS_9
	Over 50% of staff live in the Luton area, with greater potential for other modes than driving alone	Additional initiatives for local staff are discussed	ASAS_74
	Explanation needed of why the previous 60% staff modal share target has not been achieved	Target was over-challenging combined with the difficulty of developing appropriate interventions	ASAS_73

Section	Consultee Comment	Revision (April 2009)	Reference code
	There should be some more systematic analysis of the reasons for observed changes in the pattern of traveller access, so as better to target future actions	Targets have been informed by a comprehensive analysis of travel behaviour for staff and passengers - this information allows inferences to be made on surface access. This is summarised to an appropriate level in the ASAS. No change necessary.	ASAS_45
Chapter 4 - London Luton Airport Today (continued)	Explanation is needed of why the previous 35% passenger modal share target has not been achieved	Progress was made towards this target on the original timeframe, however reasons for failing to meet it are likely to be a combination of accessibility and the passenger base. No changes necessary.	ASAS_69
	Using unweighted data rather than the published weighted data is confusing and makes future comparisons more difficult.	Unweighted data used to ensure consistency between responses; full explanation has been included in the text	ASAS_21
	Weighted CAA data as used in CAA publications should be used	Unweighted data has been used to ensure consistency between responses; reference to use of unweighted has been added	ASAS_93
	Data should be presented on a more regular basis. There is no data between 2002-2007.	A full range of data has been included in the figures. More data has previously been supplied to Air Transport Forum (ATF)	ASAS_70
	Eight year spacing between staff travel surveys is too long - these should be conducted more regularly	This is acknowledged; LLAOL commits here to conduct regular monitoring bi-annual staff travel survey	ASAS_76
	The ASAS should comment on progress against previous ASAS targets	Most recent targets are discussed; however, previous targets are from 2000 and discussion would be unlikely to add to the ASAS. No change.	ASAS_87
	Bus service information is inaccurate - 101 and 102 do not enter the Airport	Text has been revised	ASAS_81
	Funding of bus services should be explored. It should be noted that Bus and Coach Working Groups have been used successfully at other airports	A note on funding for bus initiatives has been included. Bus and Coach investigation will be conducted through ATF meetings	ASAS_83
	Information on the main highway routes used to access the airports should be presented	This is presented in the ASAS. No change.	ASAS_15
	Need to consider how LLA's access requirements can be co-ordinated with the growth planned for the area	The ASAS has been produced to align with the LTP which runs to 2011. Therefore, future access arrangements can be easily coordinated with planned growth for the area. No change.	ASAS_65
	Number of rail services at Luton Airport Parkway station has decreased in recent years	Noted, although Thameslink Programme will see increased frequency and routes serving the station from March 2009. No changes necessary.	ASAS_96
	There is a need to return to a partnership approach between LLA and bus operators to maximise the numbers of public transport passengers.	Additional comments on bus initiatives and partnerships have been included. Further initiatives are being explored in conjunction with the ATF.	ASAS_10
	There is frustration about the lack of progress in developing increased public transport usage to the airport for employees, mainly because of lack of commitment to do so from airport employers	LLA are committed to engaging with stakeholders, employers and employees. Additional comment on bus initiatives included. Further initiatives are being explored in conjunction with the ATF.	ASAS_11
	Further explanation and context needed on staff car parking and other facilities	Additional information included; Key Performance Indicators (KPI) noted	ASAS_82
	It would help if the figures of original and current number of employee parking spaces are specified so as to illustrate action taken	Staff car parking provision has remained at 3,835 since the 2005 Annual Monitoring Report. No change to Interim ASAS	ASAS_28
	The number of travel cards issued or the percentage of staff involved in the travel card scheme should be specified. This will help to give a later target for improvements	A KPI has been included for future monitoring	ASAS_29
It would help to have a sub-heading of 'conclusion' in chapter 4	A sub-heading has been included	ASAS_31	
Report does not discuss how early and late shifts / flights are catered for by public transport (other than 757 service)	Additional initiatives are discussed related to local buses	ASAS_79	
Chapter 5 - Achievements	The respondent would like to congratulate all concerned on the increasing use of public transport (especially rail) for passenger access to the airport.	Noted, no change	ASAS_36
	The respondent welcomes progress made towards reductions in private car trips for passengers and staff	Noted, no change	ASAS_55
Chapter 6 - Targets	The respondent supports LLA's proposed SA target of achieving a PT modal share of 38% or greater	Noted, however the passenger public transport access target has since been increased to 40%	ASAS_5
	The respondent does not support LLA's proposed SA target of achieving a PT modal share of 38% or greater. This is not stretching enough and there should be action proposed to deter passengers using cars	Noted, however the passenger public transport access target has since been increased to 40%	ASAS_18
	(a) Doubtful that a target of 38% for public transport access to the airport is "challenging". (b) Methods for monitoring the success of the employee car-sharing scheme are unclear.	(a) The passenger public transport access target has since been increased to 40% (b) KPI included for future monitoring.	ASAS_44
	Respondent supports LLA's proposed target of achieving a passenger public transport modal share of 38% or greater	Noted, however the passenger public transport access target has since been increased to 40%	ASAS_48
	Proposes that a challenging target for passenger public transport use would be 36% or above by 2011	This is less than the proposed target. However, the passenger public transport access target has subsequently been increased to 40%.	ASAS_97
	Proposes that a challenging target for passenger public transport use would be 40% or above by 2014	Note longer timeframe - this would be outside the scope of the current LTP cycle, but information taken into consideration when setting future targets. No changes to target necessary.	ASAS_98
	Respondent suggests that the passenger target and timescale could be increased	Noted. The passenger public transport access target has been increased to 40%	ASAS_64
	Supports the passenger public transport target and views it as being both challenging and realistic	Noted, no change	ASAS_108

Section	Consultee Comment	Revision (April 2009)	Reference code
	Target should be related to expected passenger numbers and growth	DfT Guidance states that targets should be percentages	ASAS_71
	Target for passenger public transport use is lower than other London airports - this section should make the reasons for this more explicit	Other London airport ASAS targets often consider longer time period and involve much larger airports, which have scale to attract more public transport services and investment, so comparison not appropriate. For example, LGW target is 40% by the time it reaches 40mppa. Notwithstanding this, the LLA passenger public transport access target has subsequently been increased to 40%	ASAS_72
	Does not support proposed passenger access target	Noted. The passenger public transport access target has subsequently been increased to 40%	ASAS_84
Chapter 6 - Targets (continued)	Supports LLA's staff target of reducing single car occupancy to 60% or less	Noted, no change	ASAS_2
	Supports LLA's staff target of reducing single car occupancy to 60% or less	Noted, no change	ASAS_17
	Supports LLA's staff target of reducing single car occupancy to 60% or less	Noted, no change	ASAS_6
	Agrees that LLA's targets are sufficient to ensure the ASAS's sustainability aspirations, but only in the period to 2011	Noted, no change	ASAS_7
	Supports LLA's staff target of reducing single car occupancy to 60% or less	Noted, no change	ASAS_49
	Staff modal share target could be made more challenging considering the proportion of staff in the local area	60% is viewed as a challenging target on this timeframe - this will be reviewed and revised if necessary on a yearly basis. No change	ASAS_63
	Supports staff driving alone target of 60%	Noted, no change	ASAS_109
	More explanation of how staff ASAS target would be achieved is needed	Additional initiatives are discussed in the Interim ASAS	ASAS_77
	Does not support proposed staff access target	Noted. This target is viewed as challenging but realistic. No change	ASAS_85
	More explanation would be required on reasons for the increase in staff public transport use	Likely due to improved services and Travelcard (although difficult to clarify due to time since previous survey). Additional KPIs as part of annual monitoring will allow this to be monitored in future years. No changes necessary.	ASAS_94
	Expects the report to include a view of achievements but notes that the employee target has been missed	Noted - retained target will be challenging but is viewed as realistic. No changes necessary.	ASAS_12
	Failure to achieve long-term modal shift targets has implications for both the local and wider highway network.	Noted, the Interim ASAS targets have been reviewed here and will be further reviewed in 2011; revised targets will be set as necessary. The AMR will closely monitor traffic flows to and from LLA. No changes necessary.	ASAS_14
	It is suggested that the date "end 2006" is added to both targets	Targets are quoted directly - timeframe now specified in preceding text: "...challenging targets for the period 2002-2006"	ASAS_32
	How does LLA envisage monitoring against targets where there are so few targets, other than the headline figures. The CAA survey will be the key to checking overall targets (hence the need to revert to published figures). Each action proposed in the ASAS needs a target to measure its success against	KPI's have been included for future monitoring. Unweighted CAA data is utilised and justified in the document. It is envisioned that the actions will contribute to achieving the two targets.	ASAS_35
	The draft ASAS takes no long-term view regarding setting challenging goals, and short-term targets are not particularly challenging	Short-term targets are challenging, and will be reviewed annually. No changes necessary.	ASAS_40
	Although supports the proposed targets, suggests LLA consider stretching these targets by keeping the ASAS under regular review.	Annual review is a key part of the draft ASAS - this will include re-appraisal and if necessary revision of targets; a revised ASAS will be prepared and consulted in 2011 in line with the LTP schedule. Annual review is made clear together with the KPI. Notwithstanding this, the passenger public transport access target has since been increased to 40%	ASAS_50
	The proposed targets go some way to achieving sustainable surface access. However, targets should be reviewed on a regular basis taking account of high-level regional objectives identified in the Regional Economic Strategy.	Targets will be reviewed on an annual basis; LLA will consider all new local, regional and national policy where relevant when the ASAS is updated in 2011	ASAS_51
	Timeline of ASAS targets should be extended	Text added to highlight Interim ASAS designed to re-align with LTP; revised document in 2011	ASAS_62
	Targets should be set to a longer term and be more challenging	Noted, although timescale has been designed to coincide with LTP cycle. No changes necessary.	ASAS_88
	ASAS should identify whether targets are realistic or deliverable	Reference added to realistic delivery in Interim ASAS timetable with additional initiatives	ASAS_89
Targets should normally reflect a five year time horizon in line with the timetable for LTPs, and should be reviewed every 5 years	Text added to highlight Interim ASAS designed to re-align with LTP; revised document in 2011	ASAS_92	
Two alternative working targets (benchmarks and data collection) and one resultant modal split target are proposed for staff surface access	Data collection already proposed and would require a modal split target regardless - additional KPIs have been proposed for the Interim ASAS	ASAS_99	
The ASAS makes no reference to the long-term goals, and only contains short-term targets up to 2011. In particular, the short-term target for improving passenger access by public transport is not sufficiently challenging	Text added to highlight Interim ASAS designed to re-align with LTP; revised document in 2011. Notwithstanding this, the passenger public transport access target has since been increased to 40%	ASAS_103	
Proposed targets are sufficient to ensure ASAS contributes to achieving more sustainable access to the Airport	Noted, no change	ASAS_110	

Section	Consultee Comment	Revision (April 2009)	Reference code
Chapter 7 - Achieving Success	Measures in the ASAS will help ensure LLA achieves more sustainable surface access	Noted, no change	ASAS_8
	Does not agree that measures in the ASAS will help ensure LLA achieves more sustainable surface access	Additional details included on ATF consultation. Chapter 7 has been developed to include more details on initiatives	ASAS_19
	Does not agree that measures in the ASAS will help ensure LLA achieves more sustainable surface access. The ASAS needs to propose more pro-active and detailed initiatives to change behaviour. The experience of the ATF should be capitalised.	Additional details added on ATF consultation. Chapter 7 has been developed to include more details on initiatives	ASAS_20
	There is very little in section 7 that will actually change behaviours. Detailed measures need to be developed and set out in a way that can be monitored. Perhaps the Forum may help with this matter. Why is there not a commitment to a green transport plan for employees as suggested in DfT Guidance?	KPI included for future monitoring. ATF will be consulted as appropriate. Chapter 7 has been strengthened with more details on initiatives.	ASAS_33
	The draft ASAS contains no evidence of how the Airport intends to do anything significant regarding the key objective of increasing the proportion of journeys made to airports by public transport and to reduce the proportion of journeys made by private car.	Additional initiatives have been included in Chapter 7	ASAS_38
	More could be done to induce a significant modal shift as the ASAS does not explicitly outline how any new measures will help achieve the targets.	Additional initiatives have been included in Chapter 7	ASAS_52
	Action Plan required for softer measures as well as infrastructure improvements, particularly those which will have an impact on the timeline of the ASAS	Additional initiatives have been included in Chapter 7	ASAS_78
	New actions which may be implemented on the ASAS timescale should be identified	Additional initiatives have been included in Chapter 7	ASAS_90
	Agrees that the measures identified in this draft ASAS will help ensure LLA achieves more sustainable surface access for both passengers and staff	Noted, no change	ASAS_111
	The draft ASAS does not provide an indication of the cost of schemes and associated policy measures and how they might be funded.	It is very difficult to predict costs of schemes and initiatives at strategy stage, before these have been scoped out in more detail. LLAOL is unaware of any ASAS that includes details of project costs. No change	ASAS_41
Chapter 7 - Achieving Success (continued)	Efforts should be made to improve use of bus and coach services to both Hitchin and Stevenage stations	LLAOL is engaging with local partners to seek improvements to the bus network and would welcome further dialogue with Herts CC/NHDC. Annual monitoring of staff and passengers will allow take-up of bus services in this area to be assessed. No changes necessary.	ASAS_58
	Likely potential for increasing use of foot, cycle and bus by staff in the Luton area	Cycle scheme included, reference to bus investigations. Physical layout and topography contribute to making cycling and walking unattractive	ASAS_61
	The ASAS is inward looking. Improvements to the Central terminal are mentioned, however, the potential for reallocation of road space, traffic management and demand restraint measures on the wider local road network is not mentioned at all.	LLAOL engages with appropriate delivery agencies, and also through ATF, on issues such as these. No changes to Interim ASAS.	ASAS_104
	Further parking strategies should be considered: a) raising an access charge for all non-public-service vehicles entering the airport curtilage b) substantially increase the cost of on-site car parking c) substantially reducing the number of on-site car parking spaces both for public and airport employee use d) attention to the fiscal consequences of providing free on-site employee parking	LLAOL intends to introduce drop-off charges during 2009. Passenger and staff parking spaces have been significantly reduced in recent years when compared against growing passenger/employee numbers	ASAS_46
	The following interventions should be considered to induce behavioural change at the Airport: a) cycle incentives including secure parking, showers / lockers and safe cycle routes b) Demand responsive public transport services c) Integrated airline / public transport ticketing d) Flexible working e) Pool vehicles for on-site staff f) Travel Plan coordinator g) Increased marketing to raise awareness of sustainable travel alternatives	LLAOL acknowledges the suggested strategies. Additional interventions have been considered following the consultation period and included in the Interim ASAS. LLAOL will continue to examine the feasibility of further opportunities	ASAS_53
	Additional 'stick' interventions could include: a) Possible restrictions, pricing strategies and management of staff car parking b) Car park pricing / management mechanisms for passenger travel	LLAOL intends to introduce drop-off charging in 2009	ASAS_54
	Clarity on funding for infrastructure and identifying short and long term proposals required	The Interim ASAS considers on a short-term period and includes details of proposals that can be delivered on this timescale. Providing details of costs for projects/initiatives difficult at the strategy stage. No changes	ASAS_67
	Scheme costs and funding arrangements should be provided	Not appropriate or possible at strategy level	ASAS_91
	Additional interventions suggested including through-ticketing, increased parking charges, charging for drop-off zone entry	Additional initiatives included in the Interim ASAS	ASAS_100
	Chapter 7 mainly refers to schemes and measures that have already been introduced or are in advanced stages of planning. The chapter fails to recognise the role that a number of transport proposals could play in improving access and circulation around the airport. These include: - northern entrance to Luton Airport Parkway Station - Park & Ride proposals at Butterfield - proposed grade separation of M1 J10a - planned road to serve the Wigmore employment area to the east of the airport	Additional interventions have been suggested separately - to be discussed with ATF. No changes.	ASAS_106

Section	Consultee Comment	Revision (April 2009)	Reference code
	There are a number of potential measures mentioned in Govt guidance which the ASAS does not address or mention at all. In particular: - Pump priming of significantly enhanced or new local bus services, in particular to serve areas to the north and east of the town - taxi sharing schemes - Park and Ride - parking restraint and car park management	Reference included to reflect that LLAOL considering some of these, and additional, schemes	ASAS_107
	Wishes to see a major relaunch of the staff travelcard scheme, supplemented by a staff travel survey to identify reasons for staff choosing private car to travel to work.	Noted, marketing of services will help achieve ASAS goals. LLAOL to increase marketing prior to relaunch of Airport Travelcard. Staff survey to be conducted on a yearly basis as part of Interim ASAS monitoring.	ASAS_112
	Travelcard initiative could also be extended to passengers	Unlikely to be commercially viable for public transport providers. No change.	ASAS_60
Chapter 8 - Stakeholder Engagement, Consultation & Monitoring	How does LLA see the Forum "overseeing the implementation?"	ATF information added to inform this	ASAS_34
	The draft ASAS does not feature any performance indicators and other output measures which can be used to monitor and assess whether the strategy is delivering its targets and stated objectives	Additional KPIs will be identified for ongoing monitoring; draft ASAS commits to monitor and review progress on a yearly basis, with a revised ASAS in 2011	ASAS_42
	Keen to see close liaison between LLA and local bus / coach operators	LLA welcomes this approach and actively looks to improve cooperation between stakeholders. No change to ASAS.	ASAS_59
	Only two KPIs included in the draft ASAS - these are not considered sufficient and others (e.g. number of Airport Travelcards issued, staff signed-up for car sharing, travel planning use) would be beneficial	Additional KPIs have been included following the consultation period to help achieve ASAS targets. These have been established in the Interim ASAS.	ASAS_68
	Monitoring baselines, including sample numbers, are insufficient	KPI included for future monitoring	ASAS_80
	Co-operation with public transport operators necessary	Additional bus initiatives and cooperative working included in revised Interim ASAS	ASAS_101
	Progress towards targets should be reported in an Annual Monitoring Report	This is a commitment of the Interim ASAS. No change necessary.	ASAS_102
	The ASAS is reliant on the other key stakeholders providing for some of the Airport's future transport needs. However there is little reference or recognition of the role of those stakeholders. Without these achieving targets could be difficult.	Additional reference to the role of the ATF added to Interim ASAS to reflect its role	ASAS_105
Appendices		Traffic flows are presented in Appendix B. Vehicles entering the Airport will be monitored as a KPI. No change	ASAS_16
	The DfT Guidance contains a lot of information that has not been included, therefore LLA may wish to dilute the current comment	DfT guidance has been included in the Appendices, text changed to reflect interim nature of ASAS. Additional changes help ensure document reflects DfT Guidance where practical for an Interim ASAS	ASAS_23
	DfT 1999 Guidance should be inserted for completeness (even though it is mentioned in Para. 1.3)	DfT guidance summary included in Appendix	ASAS_25