

Sustainability Strategy

1. Purpose

Planning consent was granted in 2014 by Luton Borough Council (LBC) to application 12/01400/FUL submitted by London Luton Airport Operations Ltd (LLAOL). LLAOL and London Luton Airport Ltd (LLAL) have also entered into a Section 106 Town and Country Planning Act 1990 (as amended) Agreement with LBC which includes obligations with respect to sustainability, given in Schedule 4 - Sustainability.

The Section 106 Agreement requires LLAOL to submit a draft Sustainability Strategy to LBC for approval. This document has therefore been produced to satisfy that requirement.

2. Introduction

London Luton Airport is the fifth largest and among the fastest growing of the UK's airports. In 2013 it served over 9.7 million passengers and facilitated the movement of 29,000 tonnes of cargo, with nearly 98,000 aircraft movements. The airport is also an important landmark in Luton and plays a major part in its economy. It is the single largest centre of employment in the area, contributing 8,400 direct jobs and nearly £1 billion to the region each year.

LLAOL is committed to operating in a way that maximises the socio-economic benefits for the local and regional area whilst minimising our environmental impact. To ensure this vision is shared and supported, we work closely with airlines, stakeholders and business partners to promote this approach across the airport, ensuring that the full benefits that London Luton Airport can bring to the region are realised.

This Sustainability Strategy sets out our proposal for managing sustainability, and sets objectives and targets that we will strive to achieve across the airport.

3. Aviation policy and guidance

LLAOL's vision for sustainability mirrors the vision outlined in the Department for Transport's (DfT) *Aviation Policy Framework* published in March 2013, which aims to support sustainable development within aviation. The framework explains *"This means making the necessary decisions now to realise our vision of stimulating economic growth and tackling the deficit, maximising wellbeing and protecting our environment, without negatively impacting on the ability of future generations to do the same"*.

4. Environmental Management System

London Luton Airport Operations Ltd operates an Environmental Management System that covers all aspects of operations. The international environmental standard ISO14001 was obtained in September 2013 demonstrating a commitment to the continual improvement of environmental performance across the site.

The Environment Policy is published on the LLAOL website, making a public commitment to minimising the environmental impacts associated with the business activities. The current policy is provided in Appendix A.

Assessment of opportunities and measures for implementation:

Internal audits covering all requirements of ISO14001 are undertaken annually across all departments to identify opportunities for improvement. An audit is also undertaken annually by the external certification body, through which opportunities for improvement are also suggested.

Improvements will be made to the Environmental Management System promptly once identified.

Performance Target:

- Maintain ISO14001 accreditation.

5. Influencing Supply Chains

Sustainability is considered throughout the procurement process at London Luton Airport for contracts of a substantial value. Where feasible and taking into account other relevant considerations such as safety and commercial factors, London Luton Airport consider sustainable procurement options for equipment, materials and services that:

- are non-hazardous;
- have a low carbon footprint;
- have a low water footprint
- are low in embodied energy;
- are recyclable;
- are reused, refurbished or recycled;
- are from renewable or sustainable sources;
- minimises the transport impact (i.e. sources from within a 30 mile radius of the airport)
- provides local employment or economic benefit

Companies are also assessed to determine whether they are accredited to ISO14001 or whether they uphold the same commitments and aspirations as those detailed in LLAOL's environment policy (Appendix A).

This assessment is undertaken using an evaluation matrix during the procurement process to compare companies.

Assessment of opportunities and measures for implementation:

During the Curium development, further measures will be taken to ensure sustainable procurement is fully integrated into the project. The principal contractor must operate their own ISO14001 accredited Environmental Management System (EMS), and 100% of suppliers and subcontractors must also either operate their own ISO14001 accredited EMS or demonstrate their ability to comply with the principal contractor's. Contractors will be required to demonstrate that wood is procured from an FSC (Forestry Stewardship Council) accredited source, and that aggregates used are recycled or secondary aggregates (unless not made possible due to the design specification).

Opportunities for further improvements will be assessed throughout the Curium development project.

Performance Target:

- The principal contractor and all subcontractors will comply with the requirements of an ISO14001 accredited Environmental Management System
- 100% of wood used during Curium will be procured from a sustainable source (FSC certified or equivalent)
- 100% of aggregates used during Curium will be recycled or secondary aggregates

6. Energy Efficiency

Climate change is one of the most significant challenges that the aviation industry will face in the coming decades. With energy prices also rising year on year and legislation increasingly putting pressure on companies to cut their emissions, energy efficiency is high on LLAOL's agenda.

Emissions are divided into the following categories:

- Scope 1 - direct emissions from LLAOL operations i.e. gas consumption and petrol/diesel in company owned vehicles (t CO₂)
- Scope 2 - indirect emissions from consumption of electricity either within our own assets or within tenanted facilities (t CO₂)
- Scope 3 - emissions from aircraft movements, passenger and staff travel to the airport, airside activities, waste disposal, etc.

Electricity, gas and fuel consumption (scope 1 and 2) is monitored across the airport, along with the associated carbon footprint. Whilst LLAOL mainly focus on improving energy efficiency which is under our direct control, we also work with business partners such as airlines, handling agents, retail companies and transport operators to reduce their energy usage too. Further information on how this is achieved is provided in Section 10.

Assessment of opportunities and measures for implementation:

LLAOL will undertake an energy review to determine areas of significant energy use, and identify, prioritise and record opportunities for improving energy performance. From this review, an action plan will be produced designating responsibility and outlining a timescale for implementation. This review will be undertaken annually from 2015, and include energy usage contributing to emissions under scopes 1, 2 and 3, thereby implementing measures to reduce our own energy usage as well as continuing to work with partners to reduce their emissions.

Energy efficiency will also be integrated into the design and development of the terminal building. The design will include energy efficient lighting, inverter motor drives and heat recovery measures.

Performance Targets:

- Achieve accreditation to ISO50001 – Energy Management by the end of 2015.
- Reduce scope 1 and 2 carbon emissions per m² of indoor space by 5% by 2020, compared to a baseline of 2014.
- Energy-efficient lighting, inverter motor drives and heat recovery incorporated into the terminal design.

Low Carbon Generation of Heating/Cooling Facilities and Electricity

VRF heat recovery systems will be included in the terminal design. More information will be available at a later design stage.

Performance Target:

- Derive at least 10% of the total energy requirements of the terminal extension from renewable or low carbon sources.

7. Waste Management and Recycling

LLAOL has developed a waste management strategy for the Airport as part of the environmental management system. Central to this strategy is the need for LLAOL to comply with all legal requirements, including the waste management hierarchy.



A range of initiatives are in place at the Airport to reduce waste generation and encourage re-use and recycling. Textiles are also collected and donated to LLAOL's charity of the year via a dedicated clothes bin, and on average approximately 2 tonnes of textile waste are generated per month. There are recycling points for passenger waste throughout the landside and airside areas of the terminal, as well as all staff areas. These recycling points provide passengers, employees and business partners with the opportunity to recycle plastic, metal, cardboard, paper and glass. Retail units are also provided dedicated recycling facilities, which extend to food waste, oils and glass.

This encourages the segregation of recyclables at source, however waste is also sorted manually on site and off site to ensure as much waste as possible is diverted from landfill.

Waste that arises throughout construction activities will be managed separately. Excavated material will be reused on site where possible, and where waste is sent off site it will be recycled or disposed of via a licensed waste contractor.

Assessment of opportunities and measures for implementation:

LLAOL audits all aspects of the Environmental Management System annually, and measures to reduce the amount of waste generated and increase recycling rates are identified through this process.

LLAOL will operate an Environment Forum starting in 2015, where LLAOL and third party businesses located within the Airport boundary will meet to promote waste management and recycling.

Performance Targets:

- 40% annual recycling rate by 2015 for waste arising from operational activities, and 55% by 2020.
- 90% of construction waste to be reused or recycled throughout the development.

8. Water Management and Efficiency

Climate change is a strategic driver for London Luton Airport, and the airport is committed to reducing its impact to help contribute to a sustainable future. The increase in passenger numbers as a result of the development will increase water usage at the Airport. Climate change is anticipated to increase the likelihood of drought, and therefore the availability of water may be affected in the coming decades. London Luton Airport will monitor water usage across the site, and minimise site water demands to mitigate this impact where possible.

Water management issues relating to flooding, the foul network and surface water run-off will be detailed through the discharge of planning conditions.

Assessment of opportunities and measures for implementation:

LLAOL audits all aspects of the Environmental Management System annually, and measures to reduce the amount of water used are identified through this process.

Opportunities for water minimisation have also been identified through the design phase. Low-water usage appliances will be included in the terminal development and sub-metering will also be installed.

Performance Targets:

- Improve water metering facilities.
- Reduce water usage per pax by 5% by 2020, compared to a baseline of 2014.
- Low-water usage appliances incorporated into the terminal design.

9. Biodiversity

The maintenance and enhancement of biodiversity is a key sustainability issue. In the context of London Luton Airport however, the airport's constrained footprint and operational use mean that the site itself has limited ecological value.

Through the Community Trust Fund, requests for grants will be considered from local schools and community-led organisations for projects that support and enhance biodiversity at appropriate locations in the airport's catchment. The fund is managed by Bedfordshire and Luton Community Foundation, and information on how to apply is available on the London Luton Airport website.

An Environmental Management Contribution of £5,000 shall also be provided to Luton Borough Council annually for the purposes of grassland and hedgerow management at Wigmore Valley Park as the Council's ecologist considers necessary.

10. Promoting sustainability across the Airport

Sustainability is promoted not just throughout LLAOL's activities but across all organisations that work at the Airport. This is reflected in LLAOL's Environment Policy (Appendix A) which states that London Luton Airport will seek collaboration from its service partners to operate in compliance with their regulatory obligations and will encourage the adoption of industry best practice. This is achieved through a variety of ways, a number of which are detailed below. London Luton Airport's surface access strategy (ASAS) promotes the use of sustainable forms of transport to and from the airport for all staff working on the site. As well as working with transport operators to provide the best service possible for staff and passengers, we undertake a staff travel survey every two years to help identify areas for improvement. We also work with operators to ensure staff receive discounts

on bus, coach and train travel, and operate a lift-share scheme across the site. More information on how sustainable modes of transport are promoted among staff is available in the ASAS published on the LLAOL website.

Concessionaires are required to follow the Concession Design Criteria when fitting out their units. Through the design criteria, consideration is given to energy efficiency and materials used. Concessionaires are also required to follow the waste hierarchy. Recycling facilities are provided, and organisations are incentivised to use this through lower rates of disposal.

Contractors working on the Airport site are required to comply with LLAOL's Contractors Code of Practice. This covers areas including pollution control, waste management and noise.

Pollution control is a key issue across the Airport apron. LLAOL work closely with airline and aircraft servicing companies to ensure pollutants such as fuels and de-icers do not enter the surface water drains. All organisations participate in an incident and near miss reporting system to ensure proactive measures are taken to control pollution as well as reactive measures where necessary.

Airlines and air traffic control also works closely with LLAOL to help minimise the environmental impacts and maximise the sustainability of the departure and arrival routes from London Luton Airport. Operations are continually reviewed to ensure noise impacts and fuel burn are minimised as far as possible. In the last few years new flight routes have been trialled which would save 885 tonnes CO₂ annually and reduce the number of people overflow along these routes by nearly 80%. An application has been submitted to the CAA with support from airlines and air traffic control to adopt these changes, and other routes will be assessed for similar modification in the next year.

11. Monitoring

Throughout the operation of the approved Sustainability Strategy, the Operator shall report to the Council annually as part of the Annual Monitoring Report (AMR) on the performance of the Airport against the targets in this Sustainability Strategy. The activities and achievements of the Environment Forum will also be reported annually through the AMR.

Appendix A: Environment Policy (2015)



ENVIRONMENTAL POLICY

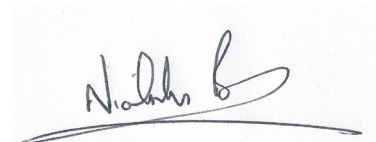
London Luton Airport Operations Ltd (LLAOL) recognises and accepts its responsibility to minimise the environmental impacts of its business activities. London Luton Airport will continuously review its environmental performance to manage those impacts.

In pursuit of this objective, London Luton Airport commits to:

- Ensure our environmental activities are safe for our employees, customers, visitors and others who come into contact with our business.
- Assess the potential environmental impacts of all operations and remove or mitigate these risks where possible.
- To comply with and or seek to exceed where possible relevant legislation, regulations and other requirements to which LLAOL subscribes in relation to its environmental aspects.
- Strive to achieve continual environmental improvement and prevention of pollution at London Luton Airport.
- Ensure LLAOL's Environmental Management System is documented, implemented, reviewed and maintained.
- Respect and adapt to the environment and ensure prudent use of natural resources.
- Improve energy efficiency and reduce associated carbon emissions where possible.
- Minimise waste generation, reuse and recycle where practicable.
- Undertake, set and review LLAOL's environmental policies, objectives and targets annually.
- Assign clear responsibilities within the organisation for all environmental management.
- Actively participate where possible in local, national or international activities aimed at mitigating the environmental impact of airports.
- Communicate this policy to all persons working for or on behalf of the organisation and make it available to the public.
- Assess all environmental impacts when improving or developing London Luton Airport.
- Ensure all employees working on behalf of LLAOL have a full understanding of their environmental responsibilities and that they are trained and competent to fulfil what is being asked of them.
- Retain ISO14001:2004 accreditation status.

This Environmental Policy encompasses those business activities, services and locations directly under the control of London Luton Airport, and is given effect through an environmental management system that meets the requirements of ISO14001:2004.

Whilst not detracting from or diminishing the responsibility of others, London Luton Airport will seek collaboration from its service partners to operate in compliance with their regulatory obligations and will encourage the adoption of industry best practice and the principles within this policy.



Nick Barton
Chief Executive Officer
London Luton Airport

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