

Hi Sian,

It was good to meet you again last Thursday and, following that session (ISH4), I have some further comments and questions to submit, please, and here they are:

## **TRAFFIC AND TRANSPORT**

At the Issue Specific Hearing 4 (ISH4), which was held on Thursday, 28<sup>th</sup> September 2023, it was clear that a number of extremely important issues have not been properly addressed by the Luton Airport Authority and must be taken into account and assessed by the Inspectors.

In the:

Action Points arising from the Issue Specific Hearing on traffic and transport (ISH4) held on Thursday 28 September 2023

and

Letter dated 3<sup>rd</sup> October 2023, from Jo Dowling, Lead Member of the Examining Authority, to The Applicant and Host Authorities

and

Letter dated 2<sup>nd</sup> October 2023 from Antony Aldridge, Head of DCO Programme, Luton Rising, to Jo Dowling, regarding ISH4

there are a number of outstanding points, questions, and requests that have not been included, and my question is: WHY NOT? These relate to the effects on the people and the town of Harpenden, through excess road traffic and the resultant extra pollution which damages health; and also the effects of increased substantial passenger numbers on the Thameslink train line on the already stressed commuters who pay a lot of money for their annual season tickets. Also, the lack of capacity for luggage. Also, no Contingency Plans for when the rail system goes down (which it does), or for when essential engineering and maintenance work has to be carried out (typically, at weekends and the Christmas and Easter holiday periods when a lot of people like to fly off for a break).

## **HARPENDEN**

1). a). Being just 6 miles from the airport, Harpenden is the closest town to the airport and, most probably, the town that would be most badly affected by the airport expansion. Harpenden is hardly featured in any of the documents, and it is critical that Harpenden is included in all areas of transport and traffic, including roads (A1081 and B653), rail, buses, cars, fly-parking, pollution, air quality, etc. The Airport Authority have dismissed the B653, Lower Luton Road, and ignored the traffic through Harpenden town centre (A1081). **It is imperative that the Airport Authority and the Inspectors fully investigate, analyse the potential damage, and produce mitigating factors.**

b). The airport's proposals do not include any significant plans to improve the east-west routes to the airport to cater for this increase in traffic.

Traffic from the east, and, in particular, the B653 (known to people in Harpenden as the Lower Luton Road), where there is NO public transport from the south-east (Hatfield, Welwyn Garden City, Wheathampstead, Harpenden, to Luton) since Centerbus cancelled the 366. **How is the Airport Authority going to change this**

**and ensure that there will a regular, frequent, and fully-staffed bus service? The Airport Authority used the phrase “commercial viability” when taking about establishing bus-routes, which indicates that the airport would only fund such measures if commercially viable rather than limit the growth of the airport to mitigate the impact. Let's get real here, bus-routes from the east to the airport will NEVER be commercially viable.**

c). Traffic from the east. The CAA model for journey routes is flawed, as it only provides point of origin, not route, and it assumes that all traffic from the east to Luton airport, travels via the M25 and M1, when satnavs point drivers across the country and, anyway, who in their right mind, if travelling with a family, heading to Luton airport to go on holiday, would risk driving on the M25 with all the congestion, delays, and hold-ups? The traffic travels along the B653, which is no more than a country road (only 5 metres wide in places), and it already takes a lot of airport traffic to the detriment of the local population. In addition, there is a new school alongside the B653, on the Lower Luton Road in Harpenden, called The Katherine Warington school, which is not yet at full capacity (two more years of growth to come, when the sixth form is in place), and has already increased the traffic flow in the early morning and evening. Children from Luton and Wheathampstead attend the school and travel along the B653. There are also major housing developments planned alongside the B653, particularly a major one in Batford of over 500 new homes, all of which will have no alternative but to use the B653 to get anywhere. **The proposed expansion of the airport would make the B653 at peak times untraversable. What do they plan to do about it? Has the current Transport Assessment shown any hard and reliable (i.e. third-party) evidence of route taken? Over what area has the modelling been done?**

d). It was claimed in the proposal last year that “passenger surveys” had been completed. However, when questioned, they amounted to a meagre 1,600, which is a meaningless, non-significant, and unrepresentative sample. This is 0.009% of the current capacity of 18 million; and 0.01% of 12 million. **Have the Airport Authority undertaken a major and extended exercise of passenger surveys?**

**For a proposal of this magnitude, proper, independent and extensive traffic surveys, over a period, need to be taken, across all roads and rail services. Then assumptions about future traffic levels can be transparent, explained and challenged.**

d). If there is an accident or other hold-up on the M1 today, the extra traffic through St Albans, Harpenden, Wheathampstead and Redbourn causes major problems. This would be much worse with increased volumes of traffic. **What mitigating factors will be introduced to prevent this?**

Public transport services, especially buses, do not offer a choice for many of the journeys people in Harpenden currently make, and services have been reduced. In fact, according to a BBC survey, Hertfordshire saw the biggest cut in vehicle mileage on bus services in England of 56.5% from 2016/17 to 2021/22. Centrebus has recently withdrawn the 366 route from Luton via Harpenden to South Hatfield, i.e. a cross-country east-west route. Apart from the 321 bus, there are no evening services and limited Sunday services.

**A report has just been published (dated September 2023) by the University of Hertfordshire Smart Mobility Unit, entitled "Transport in Harpenden", and it includes some important and relevant facts:**

Traffic levels in Hertfordshire as a whole are among the highest in Britain, at 6.6 billion vehicle miles in 2021, around 55,230 miles per head. It is not surprising, therefore, that prosperous places like Harpenden see relatively high traffic levels and consequent congestion, and official maps show Harpenden as one of the county's congestion hotspots. Car ownership in Hertfordshire is 1.38 per household (against the England average of 1.16).

It is important to note that the problems of transport and traffic in Harpenden (and places like it) have a wide range of impacts – congestion and delays are just the most noticeable issues. Motor vehicles produce pollution from their exhausts, and also from their brakes and tyres. There are internationally set, by the World Health Organisation, standards for air quality with limits to the pollutants, which aim to reduce the health impacts. However, in Harpenden, the air quality in some streets breaches these limits. For example, in Church Green, in the centre of town, the air quality breaches THREE WHO limits and is in the 67<sup>th</sup> percentile nationally, i.e. in the top third nationally for pollution. More traffic through the town will make it worse, causing even more health problems. **What mitigating factors will the Airport Authority introduce to prevent this from getting even worse?**

## **TRAINS**

1 a). The Airport Authority said that Thameslink has capacity for the airport expansion, yet Harpenden station each morning at peak commuting times shows the exact opposite. Return journeys in the peak-times from the London stations, such as St Pancras International, shows the same. **Where is the evidence? Where are the surveys and measurements of passenger numbers? The Operators of Thameslink are Govia Thameslink Railway (GTR), not Network Rail. Where is their confirmation of capacity and why were they not at the ISH4 hearing? Network Rail could not provide any meaningful information.**

b). The train passenger modelling assumes people will be standing to fit them all in, but there is no mention of their luggage. Those Thameslink trains were not designed to carry luggage - there are minimal places to put cases, rucksacks, and bags. **The numbers need to be reassessed with proper surveys and measurements of passenger numbers, plus clear assumptions that can be assessed for realism.**

c). The Airport Authority have not taken into account the level of new housing that is planned in all areas that will use Thameslink - Harpenden, St Albans, places in Bedfordshire (Harlington, Flitwick, Leagrave, Ampthill, and Bedford), and Luton itself - they seem to be relying on a 2016 base-case plus assumptions that are out-of-date and no longer valid. See also "The Modelling" below. Only recently (July 2023) St Albans District Council released its Draft Local Plan for 15,000 new homes in and around the District, which does not include the 550 new homes in the proposed Legal and General development in north-east Harpenden, which is only 6 miles from the airport. If you search the internet, you can find more up-to-date housing development plans for all the other places. People move to these areas for two main reasons: good schools and the ability to commute easily into London. **These new**

**figures must be included in the forecast assumptions and set out clearly so that they are transparent.**

Another example: Bedford Council Local Plan 2040 is for 1,355 dwellings each year, or 27,100 dwellings over the period covered by the plan (2020 to 2040). Taking account of existing commitments, the number of new dwellings to be allocated in this plan is around 12,275. Between 118 hectares and 142 hectares of land is needed to accommodate new office, industrial and warehousing jobs. All of this will require infrastructure to support new homes and jobs and will result in more traffic and pollution.

d). No mention at all of the impact on the rail capacity of the proposed Strategic Rail Freight Interchange to be built south of St Albans. When that is built, the trains using that facility will limit the ability of rail operators to increase passenger services. **This needs to be incorporated into the forecast assumptions.**

e). There are no Contingency Plans. Nowhere in all of the many documents, are there any contingency plans for when Thameslink, the East Midlands Railway, or the whole rail system, breaks down, which is not uncommon. When they occur, the delays can be long-lasting and substantial, and cause a lot of problems and misery. There are no easy alternatives to get into London or back out to St Albans, Harpenden, Luton and beyond. In addition, engineering works are essential and are usually carried out at weekends, or during the Christmas and Easter holiday periods when a lot of people like to fly away for a break. **What are the Airport Authority's Contingency Plans? Surely, they will not retain a string of buses (and they would need hundreds to cope with the passenger numbers) on standby for such events, which do happen and will continue to happen? What are their Contingency Plans if the DART breaks down?**

## **THE MODELLING**

1 a). The quality of a scientific field depends on how well the mathematical models developed on the theoretical side agree with results of repeatable experiments. Lack of agreement between theoretical mathematical models and experimental measurements results in bad decision-making. **Where is the evidence to demonstrate that this has been done and is accurate?**

b). A crucial part of the modelling process is the evaluation of whether or not a given mathematical model describes a system accurately. This question can be difficult to answer as it involves several different types of evaluation. **What evidence is there that the traffic and passenger modelling is even appropriate for this project, never mind accurate? Who has independently analysed it and checked it?**

c). In general, model complexity involves a trade-off between simplicity and accuracy of the model. Occam's razor is a principle particularly relevant to modelling, its essential idea being that among models with roughly equal predictive power, the simplest one is the most desirable. While added complexity usually improves the realism of a model, it can make the model difficult to understand and analyse, and can also pose computational problems, including numerical instability. **So, for a project of this size and with a substantial potential detrimental impact over a**

**wide area, it is crucial that proper surveys are completed, with assumptions clearly laid out – more simplicity and better understanding is required.**

d). Assessing the scope of a model, that is, determining what situations the model is applicable to, can be less straightforward. If the model was constructed based on a set of data, one must determine for which systems or situations the known data is a "typical" set of data. **In this case, the data is historic and way out-of-date and not appropriate to be used. New, up-to-date, accurate, relevant, and real-time data is essential.**

e). A mathematical model usually describes a system by a set of variables and a set of equations that establish relationships between the variables. The question of whether the model describes well the properties of the system between data points is called interpolation, and the same question for events or data points outside the observed data is called extrapolation. **But the base year is 2016, which is 7 years' ago, and there are no more data points other than inaccurate assumptions.**

f). Do the representatives of Luton airport and the Inspectors understand the modelling, the mathematics and the mathematical formulae underlying it? Taking a base year of 2016 is ridiculous (and who is to say that the statistics from that year are accurate? Have they been checked and verified? If so, by whom?) as so much has happened since then and it needs to be factually measured not assumed and modelled. There are so many assumptions going into the model that can be challenged and, also, many of those assumptions are now out-of-date, with subsequent new reports setting out house-building and new industrial units and business parks. **The assumptions and modelling for the number of vehicles on the roads and the number of passengers on Thameslink needs to be strongly challenged - they are wildly under-estimated.**

g). the new Junction 11A – Chalton Interchange, which links the A5 and A5505, brings more traffic onto the M1 from Dunstable, Leighton Buzzard, Houghton Regis, Milton Keynes, and Aylesbury. It was opened on the 10th May 2017, after the base-year for the model, 2016. **This has resulted in more vehicles on the M1 and needs to be taken into account in the assumptions.**

h). In the documents, 18.3.18 states: "The zone of influence for the highway network is based on the change in traffic flows. In light of the catchment area there will be changes in traffic flows over many highway links; however as one moves away from the airport the traffic disperses and the effect on the highway network reduces quickly." **This is such an arrogant statement as the problems will be dumped on the surrounding areas and highlights that this is a self-serving and downright selfish scheme that has no consideration for the surrounding areas and the environment. It is hard to see any real benefits other than within the Luton area, whereas the detriment to other communities is manifest. Approval of this proposed expansion leaves those areas to suffer the consequences forever.**

Best wishes.

John.