St Albans Quieter Skies (STAQS) wishes to make this further representation about Traffic and Transport.

STAQS has reviewed the recording of ISH4 and related documents. STAQS remains very concerned about the impact an expanded airport would have on neighbouring communities.

## Passenger volumes and modes of transport

The airport is likely to handle over 16 million passengers in 2023. Figure 4.1 in the Surface Access Strategy (APP-228) suggests that about 60% of those passengers could be expected to travel to the airport by cat, taxi or phv. This is assuming that the mode share has returned to pre-pandemic levels, if not the percentage would be higher.

That means approximately 10 million passengers arrive by those means and 6 million will use buses, coaches or trains.

Should the airport expand to 32mppa then the number of passengers arriving by car, taxi or phy will increase to 20 million unless the airport successfully reduces the percentage using such vehicles.

## Impact on highways

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.

We are particularly concerned about the impact on the B653, A505, A1081 from the east and the A41 and A418 from the west.

Despite being asked for many years for evidence about routes taken to and from the airport, nothing has been presented (Inspectors made a major point of this in the 19mppa application, asking for evidence of who travelled along which route). CAA postcode origin of journey is the only data offered.

We ask the applicant to provide data on each route taken through Hertfordshire (applicant states 40% of passengers come from the east). Applicant has always implied those from the east drop down onto the M25 and come up the M1 to the airport, but no survey or data have ever been produced. SatNavs, as far away as Harlow and Bishop's Stortford, promote the shortest and fastest route, which does not include a motorway, preferring Hertfordshire's rural roads (the B653 is just over 5m wide in places and is already congested).

Our understanding from the representations made at ISH4 is that the applicant has not yet finalised its Sustainable Travel Plan to demonstrate how it will reduce the volume of passengers arriving by car, taxi or phy in order to mitigate the impact on those roads.

Nor has the applicant produced more than an outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA). This outline TRIMMA does not cover impact on the rail services and appears to be focused on the area immediately surrounding the airport.

There is also no clarity about the form and size of the Sustainable Travel Fund and whether that fund would be available to fund highways improvements in Buckinghamshire and Hertfordshire.

We were also concerned about the use of the phrase "commercial viability" which indicated that the airport would only fund such measures if commercially viable rather than limit the growth of the airport to mitigate the impact.

## Bus, coach and train services

If the airport is successful in switching passengers to bus, coach and train travel there remains significant concerns about the capacity of those services.

We understand that there is no bus service from Aylesbury to the airport and all the applicant is offering is to talk to operators about such a service. They could at least offer to subsidise a service for an extended period of time to see if it would be viable.

Whilst the applicant maintains that there is sufficient capacity on the Thameslink and EMR services there is a lack of detail about the impact passengers travelling in groups with luggage would have at peak times, especially those travelling to the airport from London during the evening peak and in the opposite direction in the morning peak.

The applicant has not, to our knowledge, addressed 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.

The applicant also refers to the proposed East West rail link connecting Cambridge to Oxford. Whilst this is planned there is currently no link between Cambridge and Bedford. The applicant considers that this would not have a material impact.

Our concern is that there are a number of such factors which individually may not have a material impact, but collectively would. For instance, the applicant contends that the expansion of the airport will boost the local economy, such growth will generate more traffic, which the application does not consider.

During ISH4 it became clear that there were a number of documents that the applicant and others (e.g. Network Rail) had yet to submit to the Inspectors. It will be difficult for us to review and comment on those documents in time for the Inspectors to be able to consider our comments. We therefore hope that when reviewing those documents the Inspectors take into consideration our concerns expressed in this submission.

John Hale

On behalf of St Albans Quieter Skies