

From: [John Smith](#)
To: [Luton Airport](#)
Subject: Re: London Luton Airport Expansion
Date: 03 December 2023 18:33:58

Hi Sian,

I attended the Issue Specific Hearing 7 (ISH7): Traffic and Transport, on Tuesday 28th November 2023 and I have an Action Point to follow up and submit - Action 31. Also, I have some additional issues to raise.

Before addressing the more detailed points, I wish to make an observation and a strong comment that, all through this Examination, the detrimental effects on Harpenden which would be caused by the proposed airport expansion, always seem to be overlooked or completely ignored. Harpenden has a population of 30,000 and is the nearest town of significant size to the airport that would be adversely impacted by the proposed expansion. It is little more than 4 miles from the airport as the crow flies, or should I say, as the plane flies. It needs to be looked at in a lot more detail and with the mitigations for the detrimental impacts clearly set out.

At the ISH7, the Applicant referred me to REP5-057 in response to my questions about the trains and rail system but, having read this again, I cannot see how it answers my questions, which I will set out below.

TRAFFIC AND TRANSPORT - RAIL

1). Table 2.1 states that the Applicant expects the number of passengers to rise by only 980 in the morning peak (6.00am - 9.30am), if passenger numbers rise from 18million per annum to 32million, which has got to be vastly understated, with an estimated 7,261 arriving passengers, which means 6,281 would travel by road. This does not make sense and blows a hole in the Applicant's claim for "Sustainable Transport". In addition, the forecasts make no comment nor allowance for the passengers' luggage - where will it go? The new Thameslink 700 trains have more standing capacity, but are not built for volumes of holiday luggage, there is not enough room.

Furthermore, the Applicant has not taken into account the substantial housebuilding programme in locations near to the Thameslink rail stations - St Albans, Harpenden, Luton, Leagrave, Harlington, Flitwick, Ampthill and Bedford. People move to these areas for a number of reasons - chiefly, for the ability to commute to London for work, and to get direct services to both Luton airport and Gatwick airport and now, with the opening of the Elizabeth line, easier access to Heathrow airport. Harpenden itself is facing the prospect of 1,700 new homes being built, which will result in greater demand for the rail services on Thameslink, mostly at peak times and weekends.

The passenger forecasts within REP5-057 are vastly understated and need to be challenged and more realistic figures put forward, taking into account growth in non-airport passenger numbers as well as a more sensible assessment of airport passenger numbers using the rail system.

2). Hertfordshire County Council have given approval for the use of the former Radlett Airfield, North Orbital Road, St Albans, for use as a Strategic Rail Freight Interchange (SRFI). This will significantly reduce, or take away completely, any possible increase in the number of services on Thameslink and the East Midlands Express. Has the Applicant taken this into account when suggesting that expansion of rail services can be achieved?

3). REP5-057 states:

2.5 Assessment of impacts

2.5.1 Appendix H sets out the impact on airport passengers from the forecast growth in background demand related to the Proposed Development (both assessment Phases 2a and 2b) at the airport, as follows:

a. In the AM peak there are available seats to accommodate passengers at Luton Airport Parkway station.

However, there will not be many seats as standing seems to be the main option, and this does not address the overcrowding that would occur at Harpenden and St Albans - the regular,

annual season-ticket commuters would be the ones that suffer as they try to catch their regular trains to work. Once again, this is a selfish, self-centred approach, without any concern for the surrounding areas, and the problem would be dumped on others.

4). REP5-057 states:

2.6.1 The assessment of rail impacts did not model individual services. This is due to:

a. The medium and long-term nature of the forecast meaning that timetables are likely to have changes before the airport growth materialises, which will impact demand for individual services.

This is a cop-out and needs to be addressed. Network Rail, Thameslink and East Midlands Railways must know the capacity that can be achieved on those rail lines, both now and in the future. They must undertake passenger forecasting themselves as new trains, carriages, development work, engineering, etc. have to be planned and budgeted for well in advance. Considering the rail system as it is, there must be little room for changes in rail timetables.

b. The exact demand on each service from the airport would have significant variance over the year and between days; by looking at the average peak period this variance is reduced.

Another cop-out. This work can and MUST be done. The peak times for airport passengers are, surely, holiday periods and the impact on the rail system needs to be assessed, including built-in contingency for delays and cancellations in trains and passenger build-up and congestion.

c. Non-airport passengers can reassign between services if they prefer less crowded trains within the peak periods, therefore wider capacity can be utilised.

This is an arrogant statement and, once again, self-centred. What are these so-called "Less-crowded trains" within peak periods? So, regular Harpenden commuters, who pay a substantial amount of money for their annual season tickets, would have to change their lifestyles just to suit Luton airport and their passengers?

5). Point 2.7.1 states clearly that the Applicant has not evaluated the impact on other stations. This is a major omission and, once again, revealing the self-centred approach to this whole proposal. The Inspectors must demand that this is fully evaluated, and include Harpenden and St Albans.

6). 5.1.2 Forecasting background demand growth was based on the data available in 2019 with future growth based on growth factors based on growth in prior years. Current expectations based on the fall in commuting demand due to changing working patterns as a result of the Covid-19 pandemic means future growth is likely to be lower than previously forecast.

Previously forecast background growth was 3.1% per year resulting in a 109% growth by 2043. This is now becoming an incorrect assertion as the trend for remote working is slowly reversing. More banks and businesses, particularly in the City, are asking their staff to return to the office. In April 2023, JPMorgan Chase & Co asked its managing directors to work from the office for five days a week. Also, new research into remote work and wellbeing has shown mixed results – in Microsoft's 2022 "New Future of Work" Report, researchers found that, although remote work can improve job satisfaction, it can also lead to employees feeling "socially isolated, guilty and trying to overcompensate". The negative effects have come as a surprise for some employees, who are now feeling the crush, realising remote work isn't necessarily the wellness panacea it has been touted as. Contrary to the running narrative of a mass demand for remote work, some employees are actually choosing to switch into roles with an in-office component. From research showing that remote workers are putting in longer hours at their desk, to data suggesting that up to 80% of UK workers feel that working from home has negatively impacted their mental health, an increasingly complicated picture is emerging when it comes to the wellbeing of home-workers. One survey showed 81% of under-35s feared loneliness from long-term home working, and studies have showed heightened levels of stress and anxiety among younger workers since the shift to remote work.

7). This important question has been raised several times and has never been addressed, and REP05-57 completely ignores it.

What are the Contingency Plans if the whole rail system is down, or there are severe delays, which happens quite often and cannot be brushed-off with a quick comment such as "exceptional" and ignored? There are many reasons for delays and cancellations on the railway

system and here are some of them - most of which I have experienced in my Thameslink commuting of over 30 years: Staff shortages, strikes, powerlines down, inclement weather – too hot, cold or windy, snow and ice, lightning strikes, flooding, leaves on the line, points failures, power failures, suicides, fatalities, trespassers or animals on the railway, flooding, broken or buckled rails, landslips, signal power failures, telecoms failures, track circuit failures, damage to overhead lines, bridge strikes, cable thefts, vandalism, lineside fires, overrunning engineering works, broken-down trains, speed restrictions, and, yes, a trampoline on the line in Harpenden, which happened to me on Sunday 9th February 2020, I remember it well. Also, all rail systems have to undergo regular engineering works and maintenance, which involves a complete shut-down, or severe reductions and restrictions in the service. From all the reports and papers withing the Application, there are NO Contingency Plans as to what to do with hundreds, if not thousands, of airport passengers, their luggage and families, if the rail system is down. It seems the passengers are just dumped at Luton Airport Parkway railway station where they then become someone else's problem.

TRAFFIC AND TRANSPORT - ROADS

The two main roads to the airport through Harpenden are still not getting the attention they deserve – the A1081 through Harpenden town centre, and the B653, the local section in Harpenden is called the Lower Luton Road.

1). At the ISH7, I asked the question: Where will the traffic go when the development works in and around Junction 10 of the M1 are being carried out, and how much extra traffic would go through Harpenden? The flippant response from the Applicant was that the work will be phased. So what? The question was not answered and needs to be answered, so I ask it again: Where would the traffic go when the development works in and around Junction 10 of the M1 are being carried out, and how much extra traffic would go through Harpenden?

2). If there is an accident or other hold-up on the M1, the only alternative is for the traffic to go through St Albans, Harpenden, Wheathampstead and Redbourn, and this causes major gridlock problems. This would be much, much worse with increased volumes of traffic caused by this proposed airport expansion. In one sense, the M1 is the “by-pass” for St Albans and Harpenden.

What are the mitigations that will be introduced to prevent this happening? In Harpenden, the air quality in some streets breaches World Health Organisation (WHO) limits on pollutants - for example, in Church Green, in the centre of town, the air quality breaches THREE WHO limits and is in the 67th percentile nationally, i.e. in the top third nationally for pollution (Source: A report published in September 2023 by The University of Hertfordshire – Smart Mobility Unit, entitled “Transport in Harpenden”). This would be exacerbated and the impact on health and wellbeing would get worse if the proposed airport expansion is approved. I recommend that the Inspectors read that report on transport, it is publicly available.

3). 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. The only bus service going East-West cross-country, from South Hatfield, Welwyn Garden City, through Wheathampstead and Harpenden to Luton, the 366 route, has been withdrawn! It is farcical the airport is aiming for 45% sustainable transport to and from the airport when they currently have zero from the East and 40% of their passengers! Apart from the 321 bus through Harpenden town centre, there are no evening services and limited Sunday services.

The flawed assumption continues to be advocated, without any empirical evidence, that all passengers from the east travel via the M25 and M1, which is incorrect, especially as 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 and the M1 with all the congestion, delays, and hold-ups? Just because Google Maps suggests the M25 and M1 route, it does not make the assumption correct and for the Inspectors to rely on that assumption would be reckless and shallow.

To enhance the point:

4). Planning Inspectorate Scheme: Volume 5 Environmental Statement and Related Documents: 5.01 Chapter 18: Traffic and Transportation:

18.7.7 It says the B653 to the south of Luton is only attractive for car travel to and from a limited area which is confined to Harpenden, villages along the B653 and parts of Welwyn Garden City and Hatfield.

Where is the evidence for this critical assumption? What about passengers from Hertford, Ware, Hoddesdon, and even Essex - Chelmsford and Colchester, and Suffolk?

The B653 is no more than a country road, and 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, for the sixth form to be established), 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.

Furthermore, the planned housing development will result in Batford, which lies alongside the B653, doubling in size, resulting in a major increase in road traffic on the B653 as there is no other option for access to other areas.

5). The St Albans District Local Plan has recently been published (publication date: 11th July 2023), with proposals designed to meet the Government-imposed housing target of 15,000 new homes.

Sites in Harpenden could make way for more than 1,700 homes - with a suggestion for 762 homes in "North East Harpenden", which is very close to the airport. In addition, Legal and General have submitted a proposal for a new housing development of 550 homes in north-east Harpenden, on a site adjacent to the Luton Road, with at least 1,100 parking spaces. Taylor Wimpey are planning to build 220 new homes on Green Belt land on the south-east edge of Harpenden.

The traffic congestion and the resulting pollution would get even worse if the proposed airport expansion is approved. So what mitigations are planned?

PASSENGER SURVEYS

It has been claimed that "passenger surveys" have been done. However, I understand they amount to a meagre 6,000, which is a meaningless, non-significant, and unrepresentative sample, and is not enough to use with any confidence in any models. This works out at just 0.03% of the current capacity of 18 million; and even only 0.05% of 12 million.

FLY-PARKING

The Action Point 18 only covers Luton! Once again, Harpenden has been ignored, yet it is an existing problem in Harpenden, and has been for some time, particularly in the north of the town, and it is getting worse. Even the centre of the town has been affected - the residents and the local council have had to introduce a residents parking system in and around Hitherfield Lane, Lydekker Park, to stop fly-parking. So, Harpenden MUST be included in this work.

ACCIDENTS ON THE M1:

The proposal appears to be light on the information on local Accidents on the M1. The number of "Collisions" quoted is understated and misleading. This is extremely important to the Examination as to the effects on traffic congestion, delays and hold-ups, and the knock-on impacts, such as vehicles coming off the M1 early and travelling through local towns and villages, such as Harpenden and adding to their congestion, hold-ups, delays, and pollution. These accidents MUST be included in the modeling, they are NOT exceptional events. Here are some actual figures, obtained via a Freedom of Information Act 2000 request from National Highways, dated 17th August 2023. National Highways were asked: Please can you provide details of all M1 reported accidents Northbound Junction 9 to 10 and Southbound Junction 11 to 10 for the past five years? Starting at the beginning of each calendar year. Information provided by National Highways:

Number of Accidents	J9 - J10	J11 -J10	Totals	Comments
2018	19	63	82	
2019	18	64	82	
2020	10	32	42	Lockdown started on 23 rd March 2020
2021	17	37	54	th

				Lockdown ended on 17 May 2021
2022	24	62	86	
2023 (half-year)	12	44	112	112 is Annualised

Best wishes.

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Harpenden
Unique Interested Party Reference Number: 20038700