

**Unique Reference 20040142**

**St. Albans Quieter Skies**

**Deadline 6 submission - comment on Luton Rising Surface Access Strategy – on behalf of STAQS members**

We wish to comment on the applicants' proposals for surface access – particularly for road users – following Issue Specific Hearing 7, Traffic and Transport.

We have three points that we ask the Inspectors to consider:

**1 – The use of mode share percentages.**

The 2012 masterplan for expansion was presented for public consultation in September – October 2012.

[https://gat04-live-1517c8a4486c41609369c68f30c8-aa81074.divio-media.org/filer\\_public/98/3b/983b6c31-612b-4afa-b25a-381891de9a65/masterplan\\_sep\\_2012.pdf](https://gat04-live-1517c8a4486c41609369c68f30c8-aa81074.divio-media.org/filer_public/98/3b/983b6c31-612b-4afa-b25a-381891de9a65/masterplan_sep_2012.pdf)

Within section 3, – Public Transport Accessibility, there is the following statement:

**3.31** The Airport's national, regional and local multi-modal transport links include a well-developed coach network, excellent rail connections via Luton Airport Parkway station, and high quality connections to the local and strategic highway network. In 2010, 32% of passengers arrived or departed by train, bus or coach, while 16% travelled by taxi (see figure 3.1). LLAOL aims to increase the proportion of air passengers travelling to and from the Airport by public transport to more than 40% by 2017.

Also within the 2012 Masterplan there are figures for the number of passengers forecast to use Luton Airport in a growth profile.

<b>Year</b>	<b>mppa</b>	<b>ATMs-000s</b>
2013	10.3	112
2014	10.8	116
2015	11.2	118
2016	11.7	121
2017	12.1	124
2018	12.6	128
2019	12.9	130
2020	13.4	132
2021	14.3	137
2022	14.8	141
2023	15.4	144
2024	15.8	146
2025	16.6	150
2026	17.3	154
2027	17.7	156
2028	17.8	157
2029	17.8	157
2030	17.8	157
2031	17.8	157

**Figure 9.1 - Upper end passenger and associated ATM unconstrained demand forecasts for LLA**  
Source: LLAOL (2012)

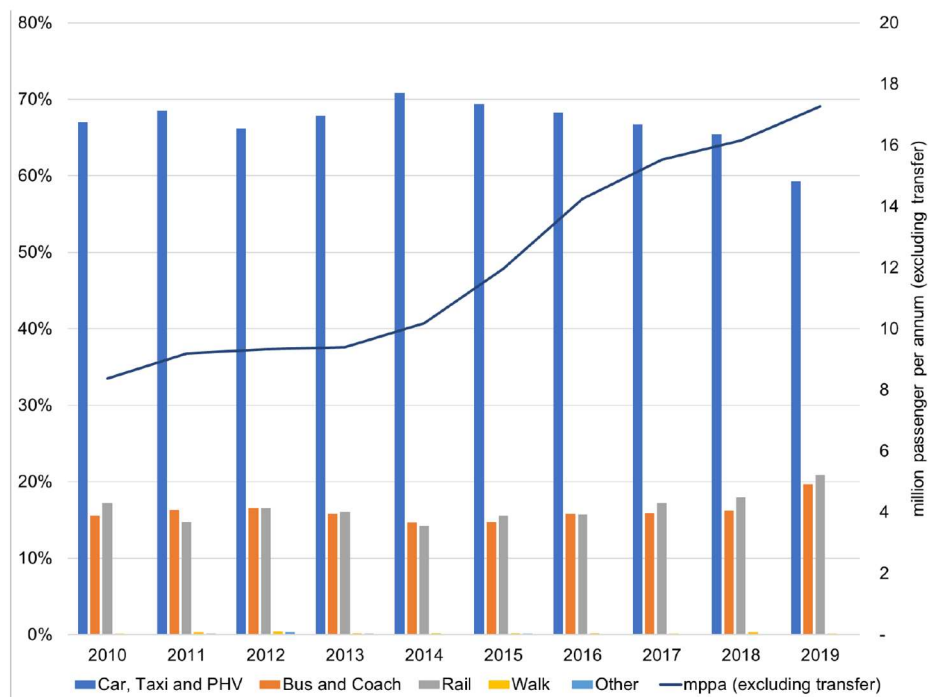
We believe the continued use of “mode share” as a percentage hides the true impact that Luton Airport traffic has on local roads.

For example, if the aspiration of 40% of passengers using public transport by 2017 had been achieved, this would have been 60% not using public transport. 60% of a forecast 12.1mppa would be 7.26 million road passenger journeys.

Passenger numbers and mode share percentages are published by the airport operator in the Annual Monitoring Reports (now renamed Sustainability Reports).

Figures from these reports have been used by the applicant within their document 7.12 – Surface Access Strategy. Application reference TR020001/APP/7.12.

Figure 4.1: Passenger mode share between 2010 – 2019 and million passengers per annum (CAA data for Luton Sample size c.10k, final mode and annual passenger volumes)<sup>2 3</sup>



As can be seen, passenger numbers using Bus, Coach and Rail in 2017 represented 33% of the actual 15.8mppa. 67% did not, which when combined with the higher passenger numbers that were a consequence of the incentivised growth meant that there were 10.58 million passenger road journeys – the original target missed by 45% just five years after it was published.

Targets for mode share percentages – even if achieved – do not show the real world growth in road traffic caused by the passenger growth. The forecast passenger growth is far greater than the small and unambitious improvement in mode share towards public transport.

The applicant seeks to increase the public transport mode share to 45% - which means 55% will not.

55% of a 32mppa airport would be 17.6 million road passenger journeys - 67% greater than the actual number of road journeys made in 2017, and that figure is already 45% higher than they forecast in the Masterplan. We suggest that the

B653 could not cope with such an increase and the communities along the route would suffer greatly.

**The 45% target for public transport use is not ambitious. It needs to be higher, and expansion must be halted if the mode share targets are not achieved at key milestone dates.**

## **2 – Reporting of Taxi and Passenger Drop Off numbers.**

We suggest that the impact of Taxi and Drop Off mode share numbers is under represented.

When a passenger uses the drop off zone (or a taxi) then that vehicle makes two road journeys for each arrival and each departure.

With the cost of airport parking being high, this is an attractive method used by many to access the airport.

In 2019, 45% of passengers used “Drop Off”, compared to 16% using car parks. (Source: Annual Monitoring Report 2019).

**The true impact on local roads of the large numbers using passenger drop off is being under presented.**

## **3 – Roads used for surface access.**

The airport claims to have good access routes from the M1 – we leave it to others to question the capacity of the M1 to cope at peak times.

The area which St. Albans Quieter Skies represents is in the south east quadrant of the compass around Luton Airport.

We invite the inspectors to use traffic forecasting tools such as Google Maps to review the options given to drivers when travelling from the East.

Starting points in towns such as Hertford, Bishops Stortford, Harlow all propose using the B653 Lower Luton Road for the final leg from Welwyn Garden City to Luton.

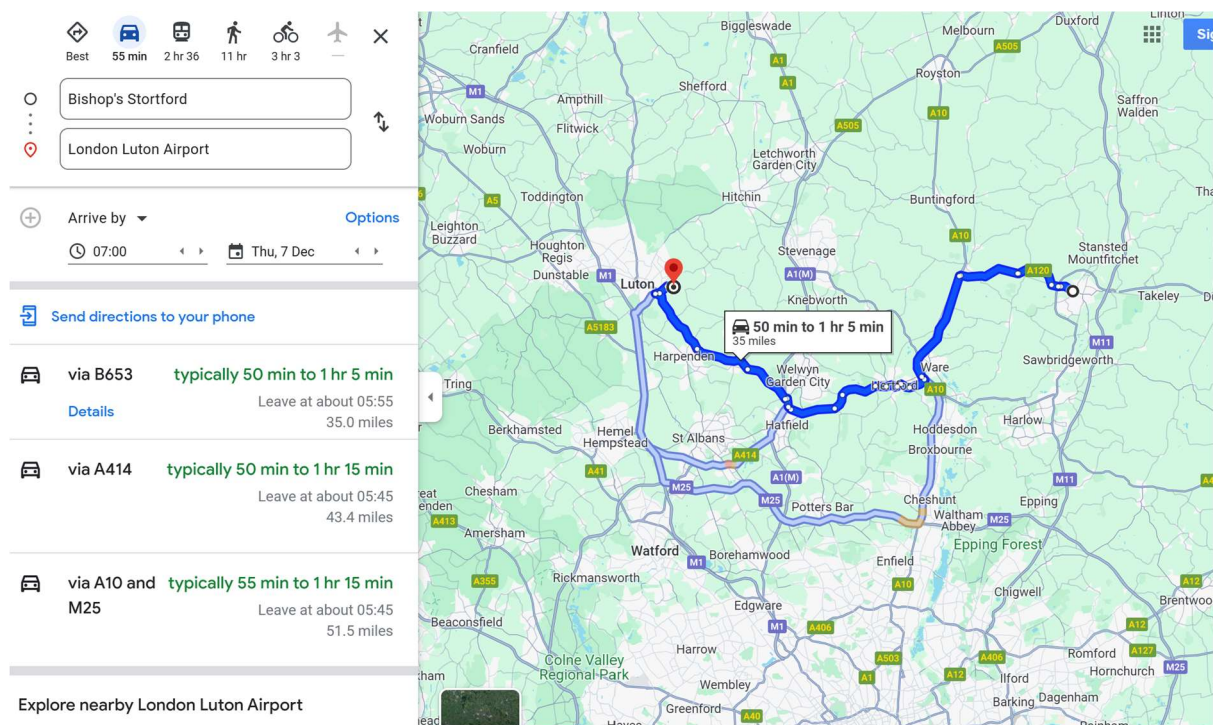
We suggest that a 32mppa airport cannot be reliant on B roads for surface access.

We note that Inspector Sarah Holmes drove this section of the B653 on the morning of the 27<sup>th</sup> November.

[TR020001-002498-14-LUTN-USI-Site-Note-A-27-November-2023-Morning.pdf](#)  
([planninginspectorate.gov.uk](#))

Along that road she will have observed the terraced cottages fronting the road and within metres of it. The schools adjacent the road – St. Johns C of E school in Lemsford, St. Albans High School in Wheathampstead, Katherine Warrington School in Batford, Noah’s Ark pre-school in Batford.

Example of the route suggested by Google Maps when travelling from Bishops Stortford.



## Conclusion

We suggest that the data presented does not reflect the true impact on local roads of airport traffic when traveling from the East.

St. Albans Quieter Skies

8<sup>th</sup> December 2023