

From: [John Smith](#)
To: [Luton Airport](#)
Subject: Re: The Proposed Expansion of Luton Airport - Examination Process
Date: 17 January 2024 18:09:12

Good evening Rammiel and Sian,

Happy New Year.

As the DCO Examination is an iterative process, I believe I have a "right of reply" to the latest writeup. I would like to submit my responses to comments made by Luton Rising in the link below, on pages 34-39.

[TR020001-002783-8.163 Applicant's Response to Deadline 6 Submissions.pdf \(planninginspectorate.gov.uk\)](#)

As a preliminary, I now expect that the members of The Examining Authority ("the ExA") have realised that the bar has now been set at a very high level for information gathering and investigations in the public domain following the recent disclosures surrounding the post office scandal and we, the general public, and the Government, will expect the ExA to probe and challenge every single aspect of this proposed expansion of Luton airport and leave nothing vague, unexplained, unproven and without firm evidence. Responses from Luton Rising that are "aspirational", "within a framework", "to be established" are no longer good enough and the wording within some of Luton Rising's submissions is now questionable. For example, the word "robust", which they use for a number of elements, including methodology and modelling, is now discredited, having been found to be worthless and meaningless, as it was used by the post office to describe their flawed and faulty system Horizon. "Robust" does not mean that anything is faultless or fit for purpose. Here is a quote from an article in The Daily Telegraph on the 9th January, written by Allison Pearson, about the post office scandal: "Apart from keeping a straight face when she insisted the Fujitsu software that was playing havoc with sub-postmasters' accounts, leaving them in terrifying arrears, was "absolutely accurate and reliable" and, of course, that favourite word of the elite, slithering classes, "robust"."

General Points: I still do not see any specific references to protecting Harpenden from the damaging impact of the proposed airport expansion, despite many pages about protecting Hitchin, particularly the roundabout. Harpenden is closer to the airport and has a population of 30,000.

Comments and Questions: Why has this not been done? When will it be done?

11.3: Traffic and Transport (Rail) Forecasts: Luton Rising Statement: "The background demand forecast takes into account growth with 3.1% annual growth based on 2018/19 levels of rail demand. This was based on average demand growth prior to 2018."

Comments and Questions: This is out-of-date, over 6 years' old and does not take into account the housing growth since then and also planned along the Thameslink and Midland Main Line routes and the additional passengers that will result. They have also completely ignored the additional passengers which will use the trains as a result of the new station which has opened, Brent Cross West

(between Cricklewood and Hendon), nor the new stations planned at: Wixams (between Flitwick and Bedford), Ampthill (between Flitwick and Bedford), Clay Cross (between Chesterfield and Ambergate/Alferton), Irchester (Rushden Parkway, between Wellingborough and Bedford).

11.5: Transport (Rail) Forecasts: Luton Rising Statement: "It is not expected that the Strategic Rail Freight Interchange (SRFI) impacts planned capacity as set out in the statement of facts between NR and the appellants not all existing paths are utilised all applications for additional paths will be subject to the standard industry-wide timetable planning process.(Ref4). The forecast increased in demand from the development is expected to be accommodated within the proposed capacity of the railway network."

Comments and Questions: "Not expected" and "expected" are not good enough - where is the evidence and the proof? It needs to be much stronger and more certain than just "not expected" and "expected". I refer again to the post office scandal and the burden of proof and evidence which was not shown, NOR CHALLENGED, which is the important point!

11.6: Transport (Rail) Forecasts: Luton Rising Statement: "As the planning of the future rail network is undertaken over the medium and long-term this is subject to change and uncertainty. The timetable as set out in Appendix H [APP-202] represents the Applicant's understanding of future capacity on the network."

Comments and Questions: Once again, without substance and aspirational, and more evidence and certainty is required. Thameslink and Midland Main Line MUST have medium and long-term plans as the planning cycle for rail network development and the purchase of trains is not a short-term exercise.

11.7: Transport (Rail) Forecasts: Luton Rising Statement: "The forecast low number of airport related passengers at Harpenden and St Albans compared to the scale of the stations during the peak period does not require detailed evaluation of station capacity."

Comments and Questions: Luton Rising have completely misunderstood my comments about the packed trains at Harpenden and St Albans. My point is that the additional airport passengers would make it even harder for regular commuters to get on trains at Harpenden and St Albans and their comments were about the number of airport passengers catching trains at those places! Complete misreading and misunderstanding. I still require an answer to my question on what mitigations will be put in place to allow regular commuters to be able to catch their trains without overcrowding due to airport passengers and their luggage? Annual passenger numbers using Thameslink from Harpenden are 2.4 million (2022/23) and growing. Not insignificant.

11.9: Traffic and Transport (Rail): Luton Rising Statement: "It is industry best practice to model and assess a typical situation on the highway and rail networks and not a perturbed situation as described. It is the responsibility of the Train Operating Companies and Network Rail to deal with issues on the network, introduce emergency timetables and other contingency measures. The Airport Operator would be in close contact with Network Rail and Train Operating Companies during these times to understanding the contingency measures they would seek to introduce and impact on the Airport."

Comments and Questions: This answer confirms what I have been saying from

the very start about this proposed airport expansion - that it is a selfish and self-serving scheme with complete disregard for the passengers and the people and the environment surrounding it. The airport will continue to "dump" the passengers, their "paying customers", onto the DART system, to Luton Airport Parkway station, knowing full well that there are major problems on the rail system and then the passengers are at the mercy of Thameslink and Midland Main Line. Luton Airport Parkway station is remotely located with no alternative travel options. As a suffering Thameslink commuter for over 30 years, I know the misery and stress that delays cause, and the thought that hundreds upon hundreds of passengers coming off planes, many of them families, will be left to fend for themselves at Luton Airport Parkway station, beggars belief. It is simply not acceptable to just say "it is industry best practice" - it sounds like something the post office would have said to avoid the issue. A "perturbed situation" is something that MUST be modelled with such a massive increase in passenger numbers proposed and the impact that delays would have on so many people.

11.13: Surface Access: Luton Rising Statement: "The Applicant considers that the point regarding usage of the B653 was sufficiently addressed within Deadline 2 Submission Applicant's Response to Written Representations made by Members of the Public at Deadline 1 (Part 1b) [REP2-034], page 48."

Comments and Questions: They have not taken into account the effect of additional road congestion due to the planned housing developments and the expansion of the Katherine Warrington Secondary School along the country road which is the B653, and then further congestion due to airport traffic - why not? When will they do so?

11.14: Surface Access Greenhouse Gas Emissions: Luton Rising Statement: "Table 3.5 of the Strategic Modelling Forecasting Report, contained within Transport Assessment Appendices - Part 2 of 3 (Appendix F) [APP-201] sets out the forecast residential developments (greater than 250 dwellings) in terms of their certainty of delivery, ranging from reasonably foreseeable, near certain to more than likely. **The St Albans District Local Plan sites are classified as 'reasonably foreseeable', and as per TAG guidance have not been included as part of the Core Scenario modelling.**"

Comments and Questions: This is ridiculous! The St Albans Local Plan for housing developments has to be included - indeed Michael Gove, the current Secretary of State for Levelling Up, Housing and Communities and Minister for Intergovernmental Relations, is currently pushing the St Albans District Council to get their Housing Plan finalised. Every other housing development plan near to the M1, the B653, the A1081, the A505, the A6, and other roads that lead to Luton has to be included, plus the housing developments planned that are near to the Thameslink and Midland Main Line rail system.

11.15: Surface Access Consultation: Luton Rising Statement: "The use of CAA data to determine mode of travel to the airport is industry best practice. The sample size for London Luton Airport is routinely in excess of 6,000 interviews and the CAA undertakes a comprehensive validation and weighting exercise before releasing the data for use. The process of weighting ensures that the data is representative of the total population of airport users. The submission also demonstrates a fundamental lack of understanding of statistics and the required sample size of large populations in order to obtain a representative sample to the

necessary confidence level and margin of error. Sample size does not need to increase proportionally to population size to achieve the thresholds."

Comments and Questions: Firstly, the CAA data is something which was called into question at the 2022 Public Inquiry and never answered properly.

This is a particularly disparaging comment about me. It refers to my belief that a passenger survey of just 6,000 is not a representative sample of 15 million passengers and therefore of no use. They say I have a "fundamental lack of understanding of statistics". If Luton Rising need to resort to personal level criticism, then clearly they are not confident of their position. Luton Rising needs to prove and provide evidence to the ExA, myself and the general public how this magical "comprehensive validation and weighting exercise" that the CAA are alleged to have done, is all about - how can they turn 6,000 into a representative sample of 15 million passengers? Details and proof are needed.

Furthermore, just because the CAA say something, it does not mean that this is right or even applies to this particular case. Surely, the ExA can appreciate that a "one-size-fits-all" methodology cannot apply, each case has to be analysed individually.

It is important to note that sample size is just one of many factors that can affect the accuracy of a study. Other factors include the quality of the data collected, the study design, and the statistical methods used. Furthermore, the underlying rationale in "qualitative sampling" depends on the type of research, the purpose of the research, the questions being asked and the resources available. Therefore, sampling is not a matter of representative opinions, but a matter of information richness. None of this has been set out and explained by Luton Rising.

A small sample size also affects the reliability of a survey's results because it leads to a higher variability, which may lead to bias. The most common case of bias is a result of non-response. Non-response occurs when some subjects do not have the opportunity to participate in the survey. Alternatively, voluntary response bias occurs when only a small number of non-representative subjects have the opportunity to participate in the survey, usually because they are the only ones who know about it.

In the case of researchers conducting surveys, for example, sample size is essential. To conduct a survey properly, you need to determine your sample group. This sample group should include individuals who are relevant to the survey's topic.

Disadvantage 1: Variability

Variability is determined by the standard deviation of the population; the standard deviation of a sample is how far the true results of the survey might be from the results of the sample that you collected. You want to survey as large a sample size as possible; the larger the standard deviation, the less accurate your results might be, since smaller sample sizes get decreasingly representative of the entire population.

Disadvantage 2: Uncoverage Bias

A small sample size also affects the reliability of a survey's results because it leads to a higher variability, which may lead to bias. The most common case of bias is a result of non-response. Non-response occurs when some subjects do not have the opportunity to participate in the survey. For example, if you call 100 people between 2 and 5 p.m. and ask whether they feel that they have enough free time in their daily schedule, most of the respondents might say "yes." This

sample - and the results - are biased, as most workers are at their jobs during these hours. People who are at work and unable to answer the phone may have a different answer to the survey than people who are able to answer the phone in the afternoon. These people will not be included in the survey, and the survey's accuracy will suffer from non-response. Not only does your survey suffer due to timing, but the number of subjects does not help make up for this deficiency.

Disadvantage 3: Voluntary Response Bias

Voluntary response bias is another disadvantage that comes with a small sample size. If you run a survey with only a small number of people having access to or knowledge about your survey, and it is likely that those who do participate will do so because they feel strongly about the topic. Therefore, the results of the survey will be skewed to reflect the opinions of those who contribute.

In summary, sample size is a crucial factor in research as it directly impacts the reliability and generalizability of the findings to the larger population. A larger sample size can potentially enhance the precision of estimates, leading to a narrower margin of error. On the other hand, small sample sizes can lead to sampling errors such as large variability, bias or undercoverage, which can significantly affect the precision and interpretation of the results, leading to high costs for businesses or government agencies, or harm to populations of people being studied. Variability is determined by the standard deviation of the population; the larger the standard deviation, the less accurate the results might be, since smaller sample sizes get decreasingly representative of the entire population. A small sample size also affects the reliability of a survey's results because it leads to a higher variability, which may lead to bias. The most common case of bias is a result of non-response. Non-response occurs when some subjects do not have the opportunity to participate in the survey. Very small samples undermine the internal and external validity of a study. With small sample sizes, the increase in false negative rates can give a sense of complacency and lead to no process improvement. To counteract the high potential of a false negative with small sample sizes, it is best to continuously monitor these processes using control charts or try to increase the sample size.

In May 2021, the British Computer Society, a professional body for those working in IT in the UK, called for reconsideration of courts' default presumption that computer data is correct, which will include results of data modelling. The presumption that computer evidence is correct is based on a naïve and simplistic understanding of software systems. Large systems are complex and lay people cannot discern whether these systems are reliable or be confident that they can spot errors as they happen. It is difficult even for experts to judge the reliability of systems or detect any but the simplest errors. It seems absurd that anyone would want to think that computers give us a truer reality than what we know and have experienced. Additionally, the practice of modelling is spread among different fields, each characterised by its own quality assurance procedures. Without assessing model purpose, one cannot judge its quality. For this reason, while a rhetorical or ritual use of methods is lamented in statistics, it is perhaps even more frequent in modelling. What is meant here by ritual is the going through the motions of a scientific process of quantification while in fact producing vacuous numbers.

So, as well as expounding the concept that a tiny data sample is meaningful and acceptable, Luton Rising need to set out, explain and prove the quality of the data collected, the study design, and the statistical methods used; the underlying rationale in "qualitative sampling" inasmuch as the type of research, the purpose of the research, the questions being asked and the resources available. A matter of information richness. None of this has been set out and explained and proved by Luton Rising.

11.17: Surface Access: Luton Rising Statement: "Please see the response above at ID 11.11 which details why the Applicant does not consider that modelling accidents is appropriate. The extent of the network assessed as part of the application and the methodological; approaches were extensively discussed with the relevant highway authorities including National Highways. The assessment has been undertaken in accordance with typical practices and the modelling of 'incidence' including collisions would not comprise of part of the process. Given that every collision is different, it would not be appropriate to model such exceptional events."

Comments and Questions: This is ludicrous and arrogantly dismissive. I have previously submitted actual figures, obtained via a Freedom of Information Act 2000 request from National Highways, on details of all M1 reported accidents Northbound Junction 9 to 10 and Southbound Junction 11 to 10 for the past five years. The figure of 86 in 2022 and 112 (annualised) in 2023 are not insignificant and accidents and delays MUST be included in the modelling - they are NOT exceptional events, and lead to delays, congestion, and traffic problems in surrounding places like St Albans, Harpenden, and Redbourn. Luton Rising "does not consider that modelling accidents is appropriate" is an erroneous and misleading comment and assumption.

Within the "Hertfordshire Host Authorities' Response To The Examining Authority's Further Written Questions, Dated January 2024" on Parking, it says: "Mr Smith submitted a post-hearing submission restating his concern over fly parking in Harpenden [REP6-157]. Confirm if you consider there is an airport related on-street car parking issue in Harpenden. If yes, detail the engagement with the Applicant on this matter and the steps proposed to resolve this."

Hertfordshire Host Authorities' Response: "Hertfordshire County Council would only typically be involved in parking issues where they relate to safety issues (for example, the installation of double yellow lines on road junctions and bends) and is therefore not aware of fly parking issues in Harpenden. The City and District of St Albans is responsible for the implementation of Controlled Parking Zones. It has confirmed that it is not aware of a particular airport related on-street car parking issue in Harpenden."

Comments and Questions: This does NOT mean that the problem does not exist - it does! Have they bothered to find out? It is a problem and a number of people have told me that not only is it an existing problem in Harpenden, but it 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.

Best wishes.

Mr. John A. Smith

Harpenden

Unique Interested Party Reference Number: 20038700