

**From:** John Smith  
**Sent:** 08 February 2024 18:21  
**To:** Luton Airport  
**Subject:** Re: The Proposed Expansion of Luton Airport - Examination Process

Good evening Sian and Rammiel,

I would like to make this a late submission, please, as it is current and very important news (published yesterday, 7<sup>th</sup> February 2024), and important for the Examining Authority to read as it concerns flawed modelling as issued by a Public Sector Body, namely Transport for London (TfL).

## **TRAFFIC AND TRANSPORT MODELLING**

This news article published by the BBC, dated 7<sup>th</sup> February 2024, draws attention to the dangers of using modelled data instead of actual data, as issued by a Public Sector Body, in this case, Transport for London (TfL). It emphasises how critically essential it is that the Examining Authority scrutinises and challenges fully, and understands fully, all of the modelling used by Luton Rising in their application.

This is the link:

[Ulez: Complaints upheld over four radio adverts - BBC News](#)

Quotes from this article include:

TfL said it **believed** the information, "which was based on **robust** scientific evidence, was clearly presented". This loose term "robust" used again - it now cannot be held to have any acceptable meaning, other than not reliable and not trustworthy. Also the term "**believed**" - **no proof and no hard evidence**.

The Advertising Standards Authority (ASA) said TfL did not clarify that the claim was based on "modelled estimates" based on data.

**The ASA said the claim had not been "adequately substantiated" and was "likely to materially mislead"**. This shows the danger of using modelled data and not actual data, especially with a proposal as big as the proposed Luton airport expansion.

It was wrong to claim Ulez had reduced nitrogen dioxide (NO<sub>2</sub>) in central London by nearly half. There is no before and after study to back this up.

**This should have had a big caveat attached: it was a "calculation" based on estimating what would have happened without Ulez. Estimates are unreliable.**

Similarly, it was unacceptable to make a claim about "actual" deaths, rather than "modelled estimates" based on data.

**So, a very clear censure over this public info campaign.**

Best wishes.

John A. Smith

Harpden

Unique Interested Party Reference Number: 20038700