

**From:** [REDACTED]  
**To:** [Luton Airport](#)  
**Subject:** Re: Proposed Expansion of London Luton Airport - Project Update  
**Date:** 25 August 2024 21:30:02

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Good evening,

I would like to submit the following comments in respect of the Secretary of State Consultation Letter - 2 August 2024. In particular, regarding outstanding issues on which the Department requires updates, on the following:

"It is noted that the Applicant will provide additional information in relation to engagement with Network Rail, Govia Thameslink Railway, and East Midlands Railway by 20 September 2024."

Dear Secretary of State,

I write as an "Interested Party", having attended the Hearings on "Traffic and Transport" in my capacity as a private citizen and resident of Harpenden, which, as only 4 miles from Luton airport as the crow flies, would be severely and badly affected if the proposed expansion was to receive approval.

## **RAIL**

Questions were raised by Network Rail regarding the station capacity at Luton Airport Parkway and its ability to accommodate the increased passenger numbers the Proposed Development would generate. The Applicant was requested to confirm what engagement they have undertaken with Govia Thameslink and East Midlands Railways regarding the information on rail capacity contained within the Environmental Statement and Rail Impacts Summary and whether there is agreement between the parties on the conclusions.

I urge the Secretary of State to take into account the following critical issues when considering the responses from the Applicant, together with the effects on the local Rail System:

1). I have yet to see any solutions to the effects of the additional passengers and their luggage on Thameslink Trains. There is just a blind assumption that the impact will be minimal - you need to witness the Thameslink trains from Harpenden on a morning, and from St Pancras in the evening. There is limited space for luggage on these trains. A comment has been made by the Applicant about more "open spaces" being made available within Thameslink trains, but these "open spaces" will be taken up by passengers, not luggage! The Luton Airport Express starts in Corby and stops at Wellingborough and Bedford before arriving at Luton Airport Parkway, and there are only two an hour, so they will not be empty and not sufficient for the massive increase in passenger numbers. If the Luton Airport Express is not running or is having delays, then the DART system will create even more overcrowding on Thameslink - it is not sustainable.

2). What are the Contingency Plans if the whole rail system is down, or there are severe delays? The Applicant has not put forward any, they are happy to get rid of the passengers from the airport and dump the problem onto others. 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, 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, and speed restrictions. As the Applicant will know, all railway systems have to close for essential maintenance and engineering works, which can take a whole day and sometimes longer. Luton Airport Parkway station is remotely located with NO alternative travel options.

3). The projections for passenger numbers do not take into account the impact of new housing developments alongside the Thameslink railway line. Indeed, one of the main reasons for people moving to these areas is the ability to access a station and commute into central London. These places for new housing include St Albans, Harpenden, Luton, Leagrave, Harlington, Flitwick, Ampthill and Bedford. Angela Rayner has announced an overhaul of the planning system, with mandatory housing targets re-introduced to pave the way for 1.5 million new homes over the next five years. Furthermore, Angela also warns that she will not hesitate to use her powers of intervention should it be necessary – including taking over an authority's plan-making directly. In the recent draft Local Plan for St Albans and District, there were proposals to a house-building target of 15,000 new homes, with at least 1,700 homes in Harpenden alone. That number will result in a lot of additional commuters on Thameslink trains. Angela may well impose additional housing developments which would add further congestion on the rail system.

The Applicant states that "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." 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 East Midlands Rail routes and the additional passengers that will result.

4). Of special note regarding the number of passengers on Thameslink, which was not taken into account by the Applicant, is the new Brent Cross West station on the Thameslink line, which was opened by the Mayor of London on Sunday, 10th December 2023. This is not hypothesis nor an exception, this has now happened, and is hard fact. The £419 million project was due to take place in 2030, but was brought forward to put infrastructure in place before thousands of people move into new homes. It is a "doorway" to what will be a new town, and they are looking to have about **25,000 people working in the area**, which is why they need a new station, and now they have got it. A substantial increase in passenger numbers is expected.

There are also new stations planned at: Wixams (between Flitwick and Bedford), Ampthill (between Flitwick and Bedford), Clay Cross (between Chesterfield and Ambergate/Alferton), and Irchester (Rushden Parkway, between Wellingborough and Bedford).

All the figures in the Application for the proposed airport expansion on passenger

numbers on Thameslink will have to be re-assessed, re-worked, re-modelled, and re-presented for inspection, analysis and review.

5). In May 2021, East Midlands Rail introduced a new half-hourly service named "EMR Connect". The trains run non-stop between Luton Airport Parkway and St Pancras International stations. To the north the trains call at Luton, Bedford, Wellingborough, and Corby. What is confusing is that, despite the Luton Airport Express branding, these are actually trains to elsewhere, such as Corby in Northamptonshire. They just happen to stop at Luton Airport Parkway. This means: a) the trains are not adapted to carry excessive amounts of luggage, b) you have a risk of being delayed if the train gets stuck between the Midlands and Luton, and c) trains into London are likely to be busy when they reach Luton Airport Parkway.

Each train has the capacity to carry up to 170 passengers. But, 32 million passengers per annum is about 90,000 per day on a straight average, but there must be around 150,000 passengers per day in the peak summer season, which would be over 6,000 per hour and many of those will be travelling by train. How can the DART and the rail system cope?

6). 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. The Applicant states that: "It is **not expected** that the Strategic Rail Freight Interchange (SRFI) impacts planned capacity as set out in the statement of facts between Network Rail 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. The forecast increased in demand from the development is **expected** to be accommodated within the proposed capacity of the railway network." But, "**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**". Where is the evidence and the burden of proof? Remember the post office scandal and the lack of both?

7). The Applicant claims that in the morning 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. Travelling from London towards Luton in the evening would be a different matter, as passengers with luggage would then have to compete for access to the train carriages with the frustrated commuters.

8). The assessment of rail impacts did not model individual services. The Applicant said that this is due to 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. Also, as previously stated, new housing developments and the considerable increase in commuters must be built in to the forecasts.

9). The Applicant states that 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 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.

10). The Applicant states that 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 and work practice just to suit Luton airport and their passengers?

11). The Applicant states that, for southbound journeys, the existing loading on trains can be expected to be lower on the Thameslink service. Where is the evidence for this? A family returning from holiday, with children and luggage, will take the first southbound train that arrives, whether it is East Midlands Railway or Thameslink, especially if there are a lot of passengers waiting and more are arriving.

12). The Applicant has not evaluated the impact on stations other than Luton Airport Parkway. This is a major omission and, once again, reveals the self-centred approach to this whole proposal. This must be fully evaluated, and include Harpenden and St Albans.

Conclusion: this proposed expansion of Luton airport is a selfish and self-serving scheme with complete disregard for the passengers and the local 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, even when they know there are major problems on the rail system and then the passengers are at the mercy of Thameslink and East Midlands Rail, but will have to fend for themselves. 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 any issue. It is hard to see any benefits of the proposed airport expansion other than within the Luton area, whereas the detriment to other communities would be manifest. Approval of this proposed expansion would leave those areas to suffer the consequences forever.

Best wishes.

Mr. John A. Smith



Unique Interested Party Reference Number: 20038700