

From: John Smith [REDACTED]
Sent: 13 July 2025 18:57
To: Planning Policy (SADC)
Subject: Re: St Albans City & District Local Plan – Transport Modelling Narrative – July 2025. SADC/ED76B

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I wish to comment on the topic of "Transport Modelling" and draw the attention of the Examiners to the fact that there have been some major significant changes and decisions made since the Local Plan was submitted, that MUST be taken into account and to not do so would be NEGLIGENT.

1). The Secretary of State for Transport has given the go-ahead for the expansion of Luton airport from 18 million passengers per annum to 32 million which will have a massive impact on the local road and rail systems. This decision went totally against the recommendation of the Executive Authority ("ExA"), five fully qualified, Government-appointed Planning Examiners who spent six months thoroughly researching and investigating and then recommending it be turned down, with Traffic and Transport being one of their key Negative Factors - see below. To ignore their findings and recommendations would be NEGLIGENT!

2). Quotes from the ExA Report and the Secretary of State's decision:

While the ExA noted that there is no requirement to prevent an increase in airport related traffic it considered that the Proposed Development would increase traffic substantially [ER 3.20.70].

The Secretary of State has had regard to the requirements of the NPPF.....she agrees with the ExA that the amount of extra traffic the Proposed Development would generate is considerable. She notes the ExA were also concerned regarding the potential for rat running on rural roads due to the increase in traffic and that appropriate monitoring was not in place to identify and subsequently mitigate the impacts.

While the ExA notes that the TRIMMA process was designed to address this, it also noted that this only included monitoring at the locations of the proposed off-site highway works. Monitoring at other locations on the Local Road Network and Strategic Road Network would need to be undertaken by the relevant highways authority and the onus would be on them to demonstrate that any issue identified was airport related. **The ExA considers that these residual impacts on**

the road network, when considered cumulatively, could be severe and that this weighs greatly against the making of the Order [ER 3.20.71].

Overall, the ExA concluded that Traffic and Transport attracted great negative weight against the making of the Order.

The ExA's overall recommended weighting on the matters examined are as follows:

- Air Quality (little negative weight ER 3.6.167);
- Alternatives (neutral - ER 3.5.28)
- Biodiversity (little negative weight – ER 3.7.103);
- Chilterns National Landscape (great negative weight -ER 5.2.37)
- Climate Change resilience (neutral – ER 3.9.28);
- Design (neutral – ER 3.10.91);
- Geology and Land Contamination Soils (neutral – ER 3.11.41);
- Greenhouse Gases and Climate Change (moderate negative weight – ER 3.12.127);
- Health and Community (moderate negative -ER 3.13.102)
- Historic Environment (great negative weight – ER 3.14.162);
- Landscape and Visual Effects (little negative weight in the longer term – ER 3.15.162);
- Land Use (The ExA did not provide an overall weighting for this issue. The weightings for the individual elements are set out in ER 3.16.100);
- Major Accidents and Disasters (neutral – ER 3.17.15);
- Need (great positive weight – ER 5.2.6. The Secretary of State's further consideration of this matter is set out in her conclusion on the Planning Balance);
- Noise and Vibration (great negative weight. The weightings for individual elements are set out in ER 5.2.17 - 5.2.34);
- Socio-economics (great positive weight – ER 3.19.53. The Secretary of State's further consideration of this matter is set out in her conclusion on the Planning Balance);
- **Traffic and Transport (great negative weight – see ER 5.2.59);**
- Waste and Resources (neutral – ER 3.21.23);
- Water Resources and Flood Risk (neutral – ER 3.22.115. However, see 'Consider of 'neutral' matters' section above);
- In Combination and Cumulative Effects (neutral – ER 3.23.20).

3). With the announcement of the new Universal Studios Theme Park on the proposed 476-acre site in Kempston Hardwick in Bedfordshire, with an anticipated 8.5 million visitors per annum, Thameslink Trains and East Midlands Railway will be hit even harder and I very much doubt they will be able to cope with the passenger demand, and the M1 and local roads will be severely impacted. The M1 will be a nightmare to navigate and I can see rat-runs through places like Harpenden getting worse. **What mitigations will be put in place for the poor residents of local towns and villages like Harpenden? Answer - NONE!**

4). St Albans Local Plan Traffic Modelling Report. SADC/ED76C.vii
"Sustainable Travel Opportunity" - from cars to cycling, walking and public transport. Sustainable travel propensity for existing communities.
There is no guarantee that "opportunity" will convert to facts. It is pie-in-the-sky and spurious analysis - fake analysis. People do not just stop using cars and start using bicycles or walk, especially during the winter months.
"Forget trains" - many people live here to commute to London by train - there are no alternatives. A lot of journeys are local - the school-run, to the shops, entertainment, visiting friends and family, GP and dentists, local jobs, including charity shops where staff are not paid - mostly by car, with some walking if very close to the destination. There is no focus on that - the data and analysis is too broad brush.

5). **No mention of alleviations or mitigations, especially for Harpenden. Why? Because there aren't any!**

Page18: In general journey times across SAD increase between Base year, Option 0 and Option 1, with reductions in Option 2 and 3 compared to Option 1. However, there are some journey times where there are increases in Option 2 and 3 and **further investigation could be considered alongside potential mitigation measures to look to reduce delays. Yes, what are the mitigations? Answer - THERE AREN'T ANY!**

6). "There are increases in delay at some access points onto the SRN further investigation could be considered alongside potential mitigation measures to look to reduce delays." **Again, what are these pie-in-the-sky "mitigations"? Answer - THERE AREN'T ANY!**

In summary, the transport modelling is severely lacking, out-of-date, and the road network has already been thoroughly researched over a 6-month period by five fully-qualified Government Planning Inspectors who found it to have such a negative weight in their recommendation to turn down the airport expansion. **But now we know that the airport expansion is to go ahead, the concerns from the ExA will become reality! Add to this, the building of Universal Studios Theme Park and you have the ingredients for a recipe for a crisis on the roads and rail, with NO MITIGATIONS PROPOSED (BECAUSE THERE AREN'T ANY!).**

Best wishes.

Mr. John A. Smith

