

## **Doc No 9/LPA/2.24**

Outline planning application (approval of means of access, siting and landscaping only) for the development of a Strategic Rail Freight Interchange comprising intermodal area, distribution buildings (Class B8 use) and other related floorspace (Class B1/B2 use) of up to 331,665 sq.m, with a maximum height of 20 metres, together with associated road, rail and other infrastructure works, including parking for up to 1,602 cars and 617 lorries with earth mounding, tree planting and a new Park Street/Frogmore relief road. Includes additional landscape and other works on further sites to provide public access to open land and community forest. The overall proposals involve some 419 hectares.

### **Appeal by Helioslough Ltd**

**In relation to land at  
North Orbital Road, St Albans**

**REBUTTAL TO EVIDENCE PROVIDED BY MR G SMITH  
Eur Ing BENJAMIN WILSON CEng BSc (Hons), MIMechE**

**on behalf of  
St. Albans City & District Council**

**Appellant Ref: 4093**

**Planning Inspectorate Ref: APP/B1930/A/09/2109433/NWF**

**Local Planning Authority Ref: S/09/0708**

**Steer Davies Gleave Limited Ref: 22131101**

**November 2009**

## 1 Scope of Rebuttal Evidence

- 1.1 This rebuttal evidence considers the evidence submitted on behalf of Helioslough by Mr Smith.
- 1.2 In this evidence I do not present a line by line review of every clause put forward by Mr Smith, but I draw attention to specific elements of his evidence which I regard as requiring comment and detailed rebuttal. As such it cannot be implied that where I do not comment on any point, that I agree with that point.

## 2 Policy context and rail freight growth forecasts

- 2.1 Paragraphs 1 to 12 of Mr Smith's evidence [9/HS/3.1] cover much of the same policy and demand forecasting ground covered by Mr Gallop. I do not consider it necessary to comment on these points in detail, as they have been covered in my rebuttal to Mr Gallop [9/LPA/2.19].
- 2.2 I note however that Mr Smith draws attention in paragraph 6 to the recently instituted perishable goods service between Spain and London. This service terminates at Dagenham in East London for the goods to be onwards distributed by Tesco to the region and beyond. It is clearly viable therefore for a long haul train to access east London and for region wide distribution to be undertaken from an interchange in that area. This in my view demonstrates quite clearly that any argument about sub regional or smaller market areas (i.e. the North West quadrant of the M25) being applicable to an SRFI is flawed.
- 2.3 I also note the last three bullet points in paragraph 10 [9/HS/3.1], which are put forward as 'Commitments' by Mr Smith:

- Undertaking infrastructure enhancements so that longer freight trains can operate from the North West and East Midlands to London via the Midland Main Line;
- Infrastructure work to allow mainland European wagons to access London; and
- Development work on identifying an arterial route for rail freight to the north, incorporating work to allow mainland European wagons to reach the Midlands via the Midland Main Line.

2.4 To verify these commitments I refer to the DfT Strategic Freight Network document [9/CD/5.4]. With respect to the first of these commitments, the DfT document states only (in Annex C) “*Train lengthening : £40 million for schemes to be identified by the industry.*” Given that this document was only published recently I do not believe the industry has yet confirmed where these enhancements will be made.

2.5 With respect to the second point above, I have no evidence as to what this refers to. The closest commitment I can find is the gauge enhancement to W10 on the Gospel Oak to Barking Line, but this is only to W10, so it does not facilitate mainland European wagons (which could mean UIC, W9 or W12).

2.6 Again with the last of the three points above, I am unclear as to the source of the statement. The DfT Strategic Freight Network document [9/CD/5.4] states only that £5 million will be spent developing the next stage investment proposals; it does not identify what these would be.

### 3 The requirements for SRFIs

3.1 In reviewing the need for SRFIs in the UK (paragraphs 13 to 15), Mr Smith [9/HS/3.1] replicates and concurs with much of the original SRA Freight Interchange Policy [9/CD/5.1]. Mr Smith does

introduce one point in the first bullet point of paragraph 14 saying that “*terminals should be located as close as possible to their respective markets*”. It is important to note that the market in this context is the London and South East region, rather than any smaller sub region or smaller market (i.e. the North West quadrant of the M25), hence, in accordance with the SRA guidance, the proximity to market is gained by being within close proximity of the M25.

3.2 Also in paragraph 14 Mr Smith draws attention to the need for an SRFI to have W10 capability and support 12 trains per day. The Radlett site does not have W10 capability and there are no plans for it to be available at site opening, and as I have shown in my evidence there is little or no chance that 12 trains per day could access or exit the site without having a severe detrimental impact on the committed Thameslink services.

3.3 Mr Smith makes reference in paragraph 15 to the use of low platform wagons as an appropriate solution in the early days of operation. I have discussed the use and poor economics of low platform wagons in my evidence [paras 11.96 to 11.98 9/LPA/2.2] and my rebuttal to Mr Gallop [9/LPA/2.18].

## 4 The need for an SRFI at Radlett

4.1 Mr Smith discusses the merits of the Radlett proposal in paragraphs 16 to 21. In paragraph 16 Mr Smith suggests that DB Schenker “*will be able to run a train set to Radlett on two round trips from those ports [Felixstowe and Southampton]*”. I am assuming that Mr Smith is describing a situation where two train sets each operates two round trips to each of the ports.

4.2 I have discussed in my evidence [paras 11.58 and 11.59, 9/LPA/2.2] the operational difficulties presented in trying to operate intensive services. The lack of day time access to the site would mean that it would not be possible to operate a ‘there and back’ service twice a

day within the viable operational windows for gaining entry and exit from the site and it would be extremely difficult even to operate such a service just once a day.

- 4.3 Notwithstanding these restrictions, while the potential journey and turn around times may make Mr Smith's assertion (that one train set would run two round trips per day) correct, he does not demonstrate that such a service would be commercially viable and that there is any market demand for it should it be offered.
- 4.4 In paragraph 19, Mr Smith suggests that the proposed SRFI at Colnbrook would be complementary to the Radlett proposals, once again suggesting that such a facility would serve a different market. I have discussed at some length here and in my evidence [9/LPA/2.2] that SRFI's are regional facilities, so the suggestion of two sites serving different markets is false, in my view. Moreover, Mr Smith's arguments run contrary to Helioslough's own assertions that a unique market exists for an SRFI in the North West Sector and that no better site exists for such a facility in that sector. By accepting that Colnbrook could act as an SRFI, and that it falls within Helioslough's own search area for an SRFI, it is clear that an alternative site does exist for a facility within their own (albeit restricted) criteria for identifying such facilities.
- 4.5 I also note the submission to the Inquiry by Barton Willmore [Appendix K to my evidence, 9/LPA/2.13] on behalf of Goodman, the developer taking forward the Colnbrook SRFI (also known as SIFE). In their submission, Barton Willmore [paragraph 3.9, 9/LPA/2.13] state that SIFE is not being progressed as a complimentary facility and should be considered as a free standing SRFI as one of the three to four such facilities envisaged by the SRA.

## 5 Network Capacity

- 5.1 Mr Smith discusses rail network capacity in paragraphs 21 to 26, repeating the current freight path utilisation quoted by Mr Gallop of 60% (I understand indicatively from Network Rail that utilisation is around 50% in the up direction and 73% in the down), and concluding that ample capacity exists. As an operator of freight services, Mr Smith should be well aware that the availability of spare capacity is essential to the rail freight business in order to permit some degree of operational flexibility.
- 5.2 60% utilisation is quite high. No railway, passenger or freight service, is planned to 100% capacity utilisation. At around 70% - 80%, freight path utilisation capacity would be regarded as being full. In the down direction that level has already been reached. While theoretical capacity for additional services may be available and there may indeed be some practical capacity that could be available for additional services (notwithstanding the extreme difficulties in accessing the Radlett site), it cannot be inferred that anything like 40% is available.
- 5.3 According to the Network Rail Freight RUS [9/LPA/2.23] freight train use on the southern end of the MML is around 5 to 10 trains per day each way. An additional 12 trains per day would account for a more than doubling of this level. In my view considerably more detail is required to explain how this could be accommodated, even within the current timetable.
- 5.4 In paragraph 24, Mr Smith discusses the accessibility of the Radlett site from various routes. I have discussed this issue in some detail in my evidence [paras 9.27 to 9.31, 9/LPA/2.2]. I note however, that Mr Smith, whilst describing the route from the West Coast Main Line, fails to draw attention to the complexity, time and cost involved in this movement.
- 5.5 The issue of Midland Main Line loading gauge is discussed by Mr Smith in paragraph 26 [9/HS/3.1], and he reasserts Mr Gallop's

statement that a container service would be operated from site opening. I am unaware of any deep sea containers being conveyed on a W7 route (either 8'6" or 9'6"), and I have seen no evidence to indicate where this has been successfully accomplished. Similarly there is no evidence that any European swap body traffic (Channel Tunnel and short sea traffic) can be conveyed on a W7 route. I do not contend that a UK compliant conventional wagon may be operated on a W7 route, though would note that such traffic is very minimal.