

Doc No 9/LPA2.1

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**

SUMMARY PROOF OF EVIDENCE

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

October 2009

1 INTRODUCTION

Eur Ing Benjamin Wilson CEng BSc (Hons), MIMechE

- 1.1 I am a Chartered Engineer, a registered European Engineer, and a full corporate member of the Institution of Mechanical Engineers. I hold an honours degree in Mechanical Engineering.
- 1.2 I have over 21 years experience as a consultant and practitioner in private practice and public authorities including Railtrack, Crossrail, Transport for London, London Underground Limited, and the Strategic Rail Authority (SRA).
- 1.3 At the SRA (2001-2005), I held Director grade and I was a Project Manager or Project Sponsor for a large number of rail freight projects, amongst other projects.
- 1.4 My evidence is presented on behalf of St Albans City & District Council in relation to the Alternative Sites Assessment and Rail Capacity.

2 SCOPE OF EVIDENCE

- 2.1 My evidence considers aspects of the Needs Case (9/CD/2.8) put forward by Helioslough in their planning application. In particular I address the following:
 - The policy support for Strategic Rail Freight Interchanges (SRFIs) in general, and the support for one to be located at the site of the former Radlett Aerodrome;
 - The demand for SRFIs both in terms of market volume and market sectors, the extent to which that demand has been, and is being addressed and the extent to which the proposed Radlett facility could meet that demand;
 - The extent to which there is a unique and specific requirement for an SRFI to be located in the north west quadrant of the M25;

- The ability of the proposed Radlett facility to function as an SRFI from commercial, operational and technical perspectives; and
- The extent to which Helioslough have adequately assessed alternative sites and demonstrated whether there is no better site for an SRFI than at Radlett.

3 ASSESSMENT

Policy context

- 3.1 I believe that while the policy support for SRFIs in general is high, the specific policy support for the Radlett proposal is not strong in terms of regional planning policy. Moreover, in the light of the time horizon for the development of SRFI capacity there is no urgent need for any further capacity to be approved at this time.

Potential Rail Freight Market and Assessment of Demand

- 3.2 The market which SRFIs are intended to address both in policy and recognised forecasts terms is that of non-bulk domestic freight. This is not the market that Helioslough expect the Radlett facility to predominately address (only 20% of demand will be from this market) and that the international markets that they expect to form the majority of the trade using the site will be abstractive from other facilities which do not require the development of SRFIs to accommodate growth.
- 3.3 Moreover, I am of the view that Helioslough's market demand forecasts are flawed as they take no account of the rail freight market as opposed to the overall freight market or the available evidence on real market factors. Furthermore, they are based on the GB Freight Model which is not to be considered applicable at a regional or sub-regional level.

The North West Sector

- 3.4 I have reviewed whether there is a justification for a sectorised approach to locating SRFIs and whether the north west quadrant of the M25 represents an area of specific SRFI demand. I have concluded that given the size and scale of distribution centres which SRFIs are intended to address and the markets they serve there is no evidence that that a sectorised approach has any merit, nor that there is any unique market in the north west sector which an SRFI located in that sector would serve.

Commercial Ability to Act as an SRFI

- 3.5 I have reviewed the extent to which the proposed SRFI at Radlett would be capable of meeting the needs of any foreseeable markets for rail freight at the facility. I have concluded as follows;
- The proximity of the proposed Radlett facility to the principle deep sea ports means that it is very unlikely to attract significant volumes of traffic from them;
 - The lack of W9 gauge enhancement within the Helioslough scope of rail works make it highly unlikely that Channel Tunnel traffic will be attracted to the Radlett facility in significant volumes; and
 - The complexity and time penalty of accessing the site from the West Coast Main Line make it highly unlikely that domestic freight traffic will be attracted to the site.
- 3.6 Therefore from a commercial perspective the Radlett facility will not operate as an SRFI.

Operational and Technical Ability to Work as an SRFI

- 3.7 The details provided and low level of development of the scheme provide no confidence in either the deliverability or

adequacy of the rail works, and consequently no confidence that the site will be capable of operating as an SRFI.

3.8 The level of support from Network Rail claimed for the SRFI is very limited and cannot be seen as doing any more than fulfilling regulatory responsibilities.

3.9 In terms of the capability of the Midland Main Line to support freight services to the proposed Radlett SRFI, my key conclusions are;

- While the current timetable contains two freight paths in each off-peak hour, a maximum of three trains could access the Radlett site during this period and these would require flexing to be operable;
- Owing to significant timetable constraints, freight access to Radlett freight terminal will not be possible following the completion of the Thameslink Programme and implementation of the enhanced Thameslink service specification; and
- There would be a limited number of paths available to the site if operation was only possible at night time, such operations are unlikely to permit a commercially viable terminal operation and would make it difficult to match expected customer delivery times.

3.10 Overall from the technical and operational perspective, I have concluded that the facility will not be capable of operating as an SRFI.

Alternative Sites

3.11 I have reviewed the Consideration of Alternative Sites study (9/CD/2.8) submitted to support the application, and my conclusions are as follows:

- There is a lack of coherence and clarity in the approaches taken by CgMs in determining the initial list of sites;

- The initial sifting criteria is underpinned by what is the unjustifiably restrictive North West Sector principal that effectively serves to endorse the development of an SRFI in an area largely made up of the Metropolitan Green Belt;
- Notwithstanding my concerns regarding the methodology and criteria, I have demonstrated that the application of this methodology is inconsistent, unclear and in several cases incorrect;
- If the stated methodology was applied correctly, the short list identified would multiply in size fivefold, and;
- When following the fundamental requirements for a viable SRFI as outlined by the SRA (9/CD/5.1), from sites already publicly identified as potential SRFI locations, ten more suitable sites than Radlett can be identified, two of which actually appear on the appellant's shortlist of sites.

3.12 I therefore conclude that the application documents have not adequately demonstrated that there are no better sites for an SRFI than that proposed at Radlett.

4 Conclusions

- 4.1 While policy support for SRFI's in general is high, the specific policy support for the Radlett proposals is not strong. Moreover there is no urgent need for the approval of further SRFI capacity at this time.
- 4.2 The market which SRFIs are intended to address is non bulk domestic freight, Helioslough do not expect the Radlett facility to predominately address this market. The international markets that they expect to form the majority of the market do not require the development of SRFIs to permit growth.

- 4.3 Helioslough's market demand forecasts are flawed and are based on a model which is not applicable at a regional or sub-regional level.
- 4.4 Given the size and scale of distribution centres which SRFIs are intended to address and the markets they serve there is no evidence that that a sectorised approach has any merits, nor that there is any unique market in the north west sector which an SRFI located in that sector would serve.
- 4.5 The proposed Radlett facility will be not be capable of addressing any foreseeable markets, so from a commercial perspective the Radlett facility will not operate as an SRFI.
- 4.6 Due to low confidence in the deliverability and adequacy of the proposed rail works, limited support from Network Rail and insurmountable operational constraints, from the technical and operational perspective the facility will not be capable of operating as an SRFI.
- 4.7 The alternative site assessment put forward by Helioslough (9/CD/2.8) is flawed in terms of search criteria, methodology and application of process. Had Helioslough's own methodology been correctly applied then a significantly broader range of short listed sites would have been subjected to assessment.
- 4.8 A consideration of the approved or publicly identified possible SRFI locations based on the Strategic Rail Authority criteria (9/CD/5.1) for SRFI locations indicates that Radlett is a poorly located site and that a significant number of better sites (including two which are shortlisted against Heliosloughs own assessment criteria) exist for such a facility.