

APPEAL BY HELIOSLOUGH  
PROPOSED STRATEGIC RAIL FREIGHT INTERCHANGE  
PARK STREET  
ST ALBANS

STATEMENT OF CASE ON BEHALF OF STRiFE  
RULE 6 STATEMENT

ST ALBANS REFERENCE: 5/2009/0708

APPEAL REFERENCE: APP/B1930/A/09/2109433

TOWN AND COUNTRY PLANNING ACT 1990

## Introduction

1. In 2006 Helioslough submitted an outline planning application to St Albans District Council ref: 5/2006/1680 for the development of a Strategic Rail Freight Interchange on the site of the former Radlett Aerodrome.
2. STRiFE is a local interest group which was formed to represent the interests of residents in areas likely to be affected by the above proposed Strategic Rail Freight Interchange.
3. The 2006 application was refused by St Albans District Council on 19<sup>th</sup> February 2007 and Helioslough appealed against that refusal. In November and December 2007, a Planning Inquiry was heard in respect of that appeal by an Inspector appointed by the Secretary of State. The Inspector reported to the Secretary of State on 1<sup>st</sup> June 2008 recommending that the appeal be dismissed. The Secretary of State agreed with that recommendation by a decision letter dated 1<sup>st</sup> October 2008 and dismissed Helioslough's appeal.
4. On 8<sup>th</sup> April 2009 Helioslough submitted a further outline planning application (ref : 5/2009/0708) in respect of an almost identical proposed development of the same site as that which was dismissed on appeal by the Secretary of State's decision letter dated 1<sup>st</sup> October 2008. The application comprised the following development: an intermodal area; distribution buildings (Class B8 use) and other related floor space (Class B1/B2 use) up to 330,000sqm, with a maximum height of 20 metres; associated road, rail and other infrastructure works, including parking for up to 1665 cars and 617 lorries with earth mounding, tree planting and a new Park Street/Frogmore relief road; and 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.

5. STRiFE wrote to St Albans District Council on 29<sup>th</sup> June 2009 (within the statutory notice period), objecting to the proposed development and setting out detailed and extensive reasons why the proposals for the freight terminal amounted to inappropriate development in the Green Belt which would cause significant planning harm to the Green Belt (including by definition) and other harm, which harm was not clearly outweighed by very special circumstances.
6. On 20<sup>th</sup> July 2009 St Albans District Council refused planning permission for the proposed development, with the reasons for refusal detailed in the decision notice.
7. On 24<sup>th</sup> July 2009 Helioslough lodged an appeal with the Planning Inspectorate against the decision of St Albans District Council to refuse planning permission for the proposed development.
8. The appellant has elected to have the appeal heard under the bespoke appeal procedure, in which the appeal timetable should be agreed by the appellant and the local planning authority.
9. The Pre-Inquiry Statement of STRiFE (this document) is submitted in accordance with the start date letter of 19<sup>th</sup> August 2009 and Rule 6 of the Town and Country Planning (Inquiries Procedure) Rules 2000.
10. The appeal is to be considered at a Public Inquiry, the date of which is which is still to be finalised.
11. This statement outlines STRiFE's case in respect of the appeal, which will be further amplified in the evidence submitted at the Public Inquiry.

## Site and Surrounding Area

12. The site that is the subject of the appeal is broken down into 8 sites and extends over 419 hectares
13. The main site (Areas 1 and 2) comprises 172 hectares and is located on the site of the former Radlett Aerodrome, being bounded by Frogmore and Park Street to the west, the North Orbital Road (A414) to the north, the Midland Mainline Railway and Napsbury to the east and the M25 Motorway to the south.
14. Previously this site has been used for the extraction of minerals. However, this use has now ceased, and in accordance with conditions attached to the mineral planning permission(s), the area has now been restored to open countryside and is used as farm land, including the grazing of sheep.
15. The openness of the sites affords views from the adjacent train line of St. Albans cathedral, the City's premier historic landmark.
16. STRiFE's evidence will describe in more detail the site and its surroundings.

## Planning Policy

17. Reference will be made to relevant national guidance, including Planning Policy Guidance Note 2 (PPG2) 'Green Belts' (1995); and to the evolution of, and present status of, any national policy guidance in respect of the development of Strategic Rail Freight Interchanges.
18. Reference will be made to the relevant policies of the Regional Spatial Strategy for the East of England Region.
19. Reference will be made to the 'saved policies' of the Hertfordshire Structure Plan Review 1991-2011 (Adopted 1998).
20. Reference will be made to the relevant 'saved policies' of the St Albans District Local Plan (Adopted 1994).
21. Reference will be made to the emerging Local Development Framework ('LDF') and in particular the Core Strategy.

## **Grounds of Objection**

22. In their evidence, and based on their local knowledge, STRiFE will object to the proposed development on the following grounds:
- I. Green Belt
  - II. Visual Amenity
  - III. Enjoyment of the Countryside
  - IV. Noise (including the affect of the proposed development on the recently completed residential development on the site of the old Handley Page engine and wiring warehouses)
  - V. [Disruption to Travel, both by Rail and Road
  - VI. Non-compliance with the Locational Criteria of Strategic Rail Freight Interchanges
  - VII. The Inadequacy of the Alternative Sites' Assessment.]

## **.Witnesses**

23. STRiFE currently proposes to call witnesses at the Inquiry to address:
- I. Local planning implications of the proposed development
  - II. Suitability of the site as a Strategic Freight Terminal in light of the guidance contained within national and other policy guidance.
  - III. Impact of proposal on local community and will call representatives of local groups and organisations who will testify how they consider the proposed development will have a detrimental affect upon their immediate local environment and their way of life. In particular, we intend to address the following:
    - (a) Impact the development will have on this Green Belt site, and the important contribution it makes to the local environment, in terms

of separating existing communities and a providing a valuable source of recreation;

- (b) Impact the proposal will have on the existing background noise, level and the detrimental affect this will have on the amenity of residential properties. In addition, we will also question some of the conclusions reached in the Inspector's Report with respect to predicted noise levels on sleep disturbance. It will also specifically include the effect of night time noise on families living in the recently completed residential development on the site of the old Handley Page Engine and Wiring Warehouse.
- (c) Impact that the proposed development will have on established local views;
- (d) Impact that the proposed freight development will have on the network of footpaths and bridleways in the vicinity of the site; severing links between existing communities; and

IV. Impact of the proposed freight terminal on the existing and future passenger services operated on the adjacent Midland Main Line.

24. STRiFE reserves the right to add to this list as necessary in light of the Appellant's Statement of Case.

## Documentation

25. At the inquiry STRiFE will rely on the following documentation. It also reserves the right to add to this list in the period leading up to the Public Inquiry.

- I. Site layout plan
- II. Indicative Master Plan 002
- III. Development Specification Documentation
- IV. St Albans District Council Decision Notice
- V. The LIFE appeal decision
- VI. Strategic Rail Freight Interchange Policy by SRA (March 2004)
- VII. Herts County Council traffic statistics