

**Public Inquiry into Appeal by Helioslough Ltd into a proposed
Strategic Rail Freight Interchange on land in and around Former
Aerodrome, North Orbital Road, Upper Colne Valley,
Hertfordshire**

**Proof of evidence by Bill Pryce on behalf of
St Stephen Parish Council**

A LOCAL PERSPECTIVE

1. INTRODUCTION

My name is Bill Pryce. I am a St. Stephen Parish Councillor and resident of Park Street. I am currently a Training Consultant and before that I was a Police Officer.

I have been authorised to speak on behalf of the Parish Council.

St Stephen Parish Council is comprised of the settlements of Park Street, Chiswell Green, Bricket Wood, Frogmore and Colney Street. There are approximately 10500 names on the electoral roll according to figures supplied by SADC and about 5800 dwellings.

2. LOCAL FEELING

- 2.1. There is unanimous local opposition to the appellant's proposal and St Stephen Parish Council (SSPC) fully supports St. Albans City and District Council's stance in this matter. Although the scheme affects the whole district, the site is right on our, St Stephen's, doorstep and is seen as being particularly harmful to our local environment and the daily life of the residents.
- 2.2. SSPC is extremely concerned that if the scheme as outlined by the applicants goes ahead as detailed in the application documents, it will have a very detrimental effect on our villages and the inhabitants.
- 2.3. SSPC is further concerned that should the appeal be successful and the appellant's projections prove incorrect, the effect will be far worse. There is a great concern that, although the scheme professes to be that of a Strategic Rail Freight Interchange (SRFI), that in point of fact it will turn out to be just a monstrous road to road facility. We cannot prove this, but consider that it is quite reasonable to demand that should the appeal be allowed, conditions be attached to the approval that will ensure that the site does in fact operate within the parameters outlined by the appellants.
- 2.4. Above all the technical detail we should not lose sight of the fact that this site is Green Belt land and is important for the health, welfare and enjoyment of present and future generations. The land is sacrosanct and must be preserved at all costs.
- 2.5. This objection is not founded on the premise '*not in my back yard*' but on a heartfelt concern for the lives of those who live in the area now and for future generations. PPPG13 states that '*developments such as distribution and warehousing, particularly of bulk goods be located away from congested central areas and residential areas*'. This development flies in the face of that criterion.

3. TRAIN PATHS

- 3.1. We are aware that this matter will be considered at length by the Inquiry and we also recognise the need to avoid duplication of evidence. However, for the appellants proposal to succeed, the necessary freight paths must exist. There has been a great deal of controversy over this point, which hopefully this Inquiry will resolve. If it is shown that paths are available for the 12 trains envisaged, then these paths must be permanently reserved for the application site. At the time this statement was prepared,

we have only been told that, as paths are required, the freight train operators will need to apply to Network Rail through the normal process.

- 3.2. We understand this to mean that should there be competing requests; either Network Rail or the Rail Regulator will make a decision as to who has priority. If the adjudicator has to choose between a container train equivalent to about 23 to 27 HGVs (*table 1 Tech. Report 3*) or an aggregate train equivalent to 120 HGVs (*Sustainability Statement page 6 Para. 1.16*), the choice seems clear to us. We realise that to give a guarantee such as we request is probably beyond the power of Network Rail (NR) and probably the Office of Rail Regulator (ORR) but it is surely not beyond the power of the authority that has the final decision in approving or denying the appeal. Unless the paths are guaranteed, the site operators may not be able to operate an SRFI because of circumstances outside their control and we will have a road to road facility by default.
- 3.3. Therefore, we request a clear undertaking that freight paths will be available.

4. PLANNING CONDITIONS (Rail)

- 4.1. At the time this evidence was prepared, to the best of our knowledge, it had not been established beyond doubt that it is practical to complete the gauge enhancement works. We believe that it should be a condition that the gauge enhancement work should be completed before work starts on the application site. This is the only way that it can actually be shown that the exercise is feasible.
- 4.2. We appreciate that the appellant may cry foul, or perhaps find that the work is more expensive than expected, but it is they who want to develop the site for the purposes of making a profit. We do not wish a situation to arise where the site has been disturbed only to find that for some unexpected reason, this aspect of the proposal cannot be or is not completed. In such a situation, we would either end up with a road to road facility or a piece of Green Belt land that had been despoiled.
- 4.3. Therefore, we request a condition requiring the gauge enhancement and the connection to the main line, including the under-bridge, to be completed before ground works on the site commence.

5. PLANNING CONDITIONS (Roads)

- 5.1. Some 3300 HGV movements a day have been forecast We are aware that at one time the Highways Agency were requesting agreement on increased trip rates but we believe this has yet to be resolved. We are well used locally to traffic congestion, particularly when there is an incident on the nearby trunk roads and the thought of the numbers proposed by the applicant being added to our local roads fills us with dread.
- 5.2. The number of commercial vehicle movements will depend very much on how the facility is used. Until tenants are actually in place, we believe there can be no accurate forecast. The number of movements can vary greatly for the same floor-space. Property and development consultants MDS Transmodal normally quote standard stock turnover rates as 12.5 pa for a National Distribution Centre (NDC), 25 pa for a Regional Distribution Centre (RDC) and if perishable goods are involved, we understand the

stock turnover rate can be as high as 50 times a year (*Jacobs Consultancy Report page 78 para 7.1.3 and page 79 table 24.*) So for a RDC, we can expect twice as many movements as a NDC and even more if there is an element of perishable goods involved.

- 5.3. It is not clear to us on what basis the HGV movements have been calculated, NDC or RDC but it is a question we would like the appellants to answer. By way of comparison, at KIG, which is of a very similar size, two-thirds of the floor-space is proposed to operate as a NDC with the remainder as a RDC (*Jacobs Consultancy page 8*) The projected HGV movements there are 3404 a day(*Jacobs Consultancy page 80 table 28*), very similar to Radlett. We are not experts but it seems very likely to us that the Radlett figures are calculated using NDC movement figures and that the traffic movements may therefore be heavily understated.
- 5.4. Therefore, if this application is granted, we request a condition, enforceable by penalty, limiting the number of HGV movements to that projected by the Appellant.

6. SUMMARY

- 6.1. SSPC hope this appeal will be dismissed since, should it succeed, we believe that even on the basis proposed by the appellant; it will represent a disaster for our community. However, should the appeal be successful then at least provide our parish the protection we seek.

We do not ask for anything more than the appellant proposes to deliver, we merely wish to ensure that they do not deliver more than is proposed.

Kent International Gateway

Strategic Rail Freight Interchange in Kent: Logistics Rationale

Final Report

April 30th 2009

The proposed development would be:

- A total of eight warehousing units providing 345,000 m² of floor space (subsequently slightly reduced in the January 2009 revised proposal);
- 162,000 m² of rail connected warehouses (the larger of which may be slightly reduced in the revised proposals where goods can be transferred directly between trains and warehousing by fork-lift truck);
- 183,000 m² of other warehousing not linked to rail;
- A 6.5 ha intermodal terminal, where unitised¹ cargo is lifted between road and rail vehicles for either onward distribution or unpacking and processing elsewhere on site;
- Facilities for freight trains of up to 750m to arrive and depart in both north and south directions; and
- Associated office development of around 11,400 m².

The applicant's concept is that KIG would consist of the following:

- Primarily a National Distribution Centre (NDC) - a single location from which, for inbound goods, onward delivery to regional centres would take place. This use is expected to take up two-thirds of the warehouse floor space on the site;
- A Regional Distribution Centre (RDC) – a location from which regular (daily/weekly) deliveries can be made to retail/wholesale outlets in the regional vicinity. This use is expected to take up one-thirds of the warehouse floor space on the site; and
- An intermodal terminal - a specialist facility for the transfer of unit loads (principally containers) between road and rail.

The site is not envisaged as having other rail uses such as a specialist marshalling yard, where freight trains are received and re-formed but not unloaded, or facilities for handling bulk materials, such as aggregates or fuel.

The application includes no proposals for gauge enhancement and we understand the Applicant's proposal is not based on such improvement although it is referred to in supporting documents. The applicant has suggested the option of an amended shape and reduced size for the largest rail connected unit shown in Figure 2.

The rail traffic to the site envisaged by the applicant in documents submitted with the application is as follows:

“Assuming 30 unit loads per train this equates to [each way]:

*8.3 trains per day from Europe through the Channel Tunnel [and]
4.8 trains per day from British origins.”*

From this rail service, the applicant envisages that units carried by rail would account for 18.7% of the combined road and rail traffic including empty vehicles, or 22% of unit loads carried. Elsewhere the applicant describes a different rail service and this is dealt with in Chapter 8 of this report.

Rail services are proposed from the continent serving the rail connected NDC warehouses directly (conventional traffic), and other NDC's via the intermodal terminal. Domestic (UK) rail services are envisaged running from the NDC's inland to the

¹ Unitised traffic is carried predominantly in containers or swap bodies, or in various forms of piggyback units where these can be accommodated within gauge.

Table 24 Warehouse operational data

| Use | Pallets per m2 | Stock turns per annum | Pallets per unit | Operating days |
|------------------|----------------|-----------------------|------------------|----------------|
| NDC | 1.5 | 12.5 | 25 | 300 |
| RDC | 1.5 | 25 | 25 | 300 |
| RDC (perishable) | 1.5 | 50 | 25 | 300 |

Source: KIG Application; Perishable, Jacobs Consultancy.

To convert total units into units to road and rail, the mode split assumed in the planning application for inbound and outbound goods at NDCs and RDCs is set out in Table 25.

Table 25 Modal split for KIG freight

| At the NDC | Inbound | Outbound |
|-----------------------|---------|----------|
| Conventional Rail (a) | 10.0% | 0.0% |
| Intermodal Rail (b) | 25.0% | 17.5% |
| Road | 65.0% | 75.0% |
| to site RDCs | | 7.5% |
| Total | 100% | 100% |

| At the RDC | Inbound | Outbound |
|-----------------------|---------|----------|
| Conventional Rail (a) | 0.0% | 0.0% |
| Intermodal Rail (b) | 17.5% | 0.0% |
| Road | 75.0% | 100.0% |
| from site NDCs | 7.5% | 0.0% |
| Total | 100% | 100% |

Notes:

(a) in traditional wagons; (b) between road and rail

Source: KIG Application

The planning application makes assumptions about the proportions of empty back-working by road, and these are set out in Table 26.

Table 26 Estimates of empty back-working

| Empty road movements | Inbound | Outbound |
|----------------------|---------|----------|
| NDC | 60% | 25% |
| RDC | 60% | 100% |

Source: KIG Application

All intermodal trains arriving at the terminal are assumed to be fully loaded, and those leaving at 50% load, in line with applicant's figures.

7.2 Estimate of traffic flows from a fully developed site

7.2.1 The planning application

The total volume of traffic arriving and departing by train is set out in Table 27. This is based on the number of units of freight traffic attracted to/generated by the KIG development as proposed. Assuming 30 units per complete train, this amounts to 13 train movements per day in and 13 train movements per day out of the site.

Table 27 Estimated rail traffic

| Units per day by rail | NDC | | RDC | | Empty |
|-----------------------|---------|----------|---------|----------|----------|
| | inbound | outbound | inbound | outbound | outbound |
| Conventional | 60 | | | | 61 |
| Intermodal | 151 | 166 | 182 | | 166 |
| TOTAL | 211 | 166 | 182 | | 227 |
| | 377 | | 182 | | 227 |
| | 786 | | | | |

A Unit is defined as a container, wagon or swap body that holds 25 pallets
Source: Jacobs Consultancy based on KIG Application

Based on the volumes of freight and the amount moved by rail, the lorry traffic is as set out in Table 28. Overall, we believe that we have a good fit and a sound basis from which to test alternative scenarios. The applicant's figure of 3,404 daily HGV movements is reproduced in our calculation.

Table 28 Estimated two-way lorry movements/day

| HGV movements | NDC | | RDC | | Intermodal | |
|---------------|---------|----------|---------|----------|------------|----------|
| | inbound | outbound | inbound | outbound | inbound | outbound |
| Loaded | 393 | 453 | 453 | 604 | 61 | 77 |
| Empty | 236 | 113 | 272 | 604 | 61 | 77 |
| TOTAL | 628 | 566 | 725 | 1208 | 122 | 153 |
| | 1,195 | | 1,933 | | 276 | |
| Overall Total | 3,404 | | | | | |

Source: Jacobs Consultancy based on KIG Application

As can be seen from Table 27 and Table 28:

- In total, there are 4.3 times as many units hauled by road than by rail;
- The largest assumed rail traffic is to and from the NDC floorspace, with about twice as much loaded rail traffic as generated by the RDC; and
- About 29% of rail hauled units and 40% of lorry units are expected to run/return empty.

7.2.2 Alternative scenarios

Using the spreadsheet we carried out a number of changes to the inputs to estimate the effects of changes to the rail use and the NDC/RDC content. The rail movements are assumed to transfer to road with the loss of rail facilities. These results are summarised in Table 29.