

Town and Country Planning Act

Appeal by Helioslough Ltd

**Site at Land in and around Former Aerodrome, North
Orbital Road, Upper Colne Valley, Hertfordshire.**

Rebuttal to Proof of Evidence

Nick Gallop Rail Freight Evidence

**David Tucker Need, Alternative Sites and Transport
Sustainability Evidence**

Richard Tilley Policy and Planning Evidence

Jeremy Thorne

Rail Freight Operations

**On behalf of:
St Albans District Council
Hertfordshire County Council
Hertsmere Borough Council**

26th October 2007

Comment on Proof of Evidence. Rail Freight Evidence presented by Nick Gallop.

Reference is to paragraph numbers in Nick Gallop: Rail Freight Evidence. HS/2.1 Proof of Evidence

- 3.17 The Network Rail Freight RUS (CD 6.7) does not make any reference to the extent of rail linked warehousing required or assumed in the growth calculations. Paragraph 4.2.5 in CD 6.7 refers generally to possible interest in providing new terminals and table B10 in Appendix B simply lists all possible terminal developments highlighted during Freight RUS Consultations. No comment is therefore included about the extent or volume of rail linked warehousing required.
- 3.18 CD 6.1 “Strategic Rail Authority; Strategic Rail Freight Interchange Policy (March 2004) is not a Government policy document. Whilst the original document formed part of SRA policy, the demise of the SRA in 2005 rendered the policy overtaken. CD 6.3 Department for Transport “Status of the SRA Strategic Interchange Policy – October 2005” clarifies the status of the policy document CD 6.1. The SRA policy document is therefore retained for advice and guidance but is not a formal policy document.
- 3.24 The comments in this paragraph re-enforce the need for rail linked distribution centres to be located in the appropriate strategic area to minimise and reduce the need for road delivery. SRFIs or rail terminals located some distance from end markets will increase road haulage delivery mileage and increase overall rail costs. Radlett is poorly located to serve the south and east of London and the south east region in general.
- 3.25 Measured in terms of tonnes/kilometres (weight of freight lifted multiplied by the distance carried) there has undoubtedly been a growth in the volume of freight carried by rail. However, it is erroneous to infer this is due to entirely to intermodal and general freight. In addition to the growth in demand for intermodal traffic from UK ports, a number of other factors have helped to increase the volumes of freight carried by rail. These include:
- Imported coal moving longer distances to power stations.
 - Increased costs of road haulage.
 - Greater costs and delays resulting from traffic congestion.
 - Central and local government and planning process support for sustainable transport across a range of freight commodities.
 - A growing and buoyant U.K. economy.
- 3.26 The Midland Main Line (MML), to which Radlett would be connected, is not considered a key freight route for intermodal rail freight traffic. There is no reference to the MML in the context of intermodal traffic in the Network Rail Freight RUS (CD 6.7). The plans outlined in CD 6.7 for W12 clearance aspiration (Figure 6.3) and Gauge options appraised (Table 7.8) do not include

the MML. This indicates there is no intention by Network Rail and no demand from rail freight users, to provide gauge enhancement over the MML essential for an intermodal strategic freight route.

- 4.6 The comment in this paragraph again re-enforces the need for rail linked distribution centres to be located to minimise road delivery distances.
- 4.15 The success of DIRFT and Hams Hall is due especially to the location of the terminal and the rail links to the WCML, one of the principal strategic rail freight routes. Radlett does not have these strategic location advantages in respect of the rail network.
- 4.18 CD 6.1 “Strategic Rail Authority; Strategic Rail Freight Interchange Policy is not a Government policy document. The SRA policy is retained for advice and guidance but is not a formal policy document. This repeats my comments on section 3.18.
- 4.21 There is no mention of a proposed SRFI at Radlett in the SRA policy document (CD 6.1)
- 4.24 This description of the Eddie Stobart rail freight service for Tesco is an example of U.K. domestic traffic at DIRFT. The volume of such domestic traffic and implications for warehouse use and road deliveries are referred to in my Proof of Evidence paragraphs 7.2 and 7.5. Radlett is not well placed to cater for such traffic to and from Scotland and the north of England because of its location on the MML.
- 4.27 The Government White Paper “Delivering a Sustainable Railway” July 2007 (CD 4.2) refers to the development of a Strategic Freight Network (SFN) and the provision of £200 million of Network Rail investment to develop the SFN up to 2014. However the commentary on freight in the white paper concentrates on those areas regarded as “Freight Hotspots” where investment will be needed to resolve conflict and capacity issues. (section 9.27 and table 9.2 in CD 4.2) . None of these key sections involve Radlett and only the northern end of the Midland Main Line at Burton on Trent is mentioned. There is no suggestion that the Midland Main Line would be included within a Strategic Freight Network and the white paper commentary does not go into detail about sites or SRFIs.
- 4.28 The report quoted; “Rail Freight Growth and the Land Use Planning System, Sheffield Hallam University, May 1999,” is not identified as a core document. This document should be provided as a core document to consider the validity and relevance of the section quoted.
- 4.30 Neither of the two studies referred to in this paragraph are listed as core documents and it therefore not been possible to identify the basis of the figures quoted. “On the move: An outline of the UK distribution industry in the

1990s and the implications for warehousing and planning policy, Gazeley Properties Limited, June 1992” and “ West Midlands Regional Logistics Study, MDS Transmodal Limited, Savills Regeneris Consulting, 2005” should be provided as core documents to review the basis of the figures quoted.

Warehouse space proposed for Radlett amounts to 330,000 sq.m in five distribution units ranging from 44,592 sq.m. to 111,480 sq.m. This paragraph confirms warehouses should be in excess of 9,500 sq.m and often 28,000 sq. m. SRFI may still therefore operate effectively with less warehouse space than that proposed for Radlett.

- 4.31 The Trafford Metropolitan Borough Council response to the Trafford Unitary Development Plan Review of October 2004, referred to in this paragraph, is not listed as a core document. Nevertheless, the quotation suggests rail linked warehousing upwards from 30,000 sq m. can operate successfully. This is significantly less than the rail linked warehouse provision suggested for Radlett. The Trafford Metropolitan Borough Council document quoted should be provided as a core document.
- 4.32 Comparisons with Continental Europe are only of limited value because of different market circumstances and in some cases, restrictions or controls on the operation of road haulage.
- 4.34 It has been assumed this paragraph refers to Appendix E of the SRA Strategic Rail Freight Interchange Policy March 2004. (CD 6.1). As stated in comments on paragraphs 3.18 and 4.18, this document does not constitute Government policy.
- 5.3 It is understood Willesden terminal remains connected but is not currently receiving any traffic. It has not been formally closed. The East of England also has an approved site at Alconbury which has not yet been developed and the site at Howbury Park (Bexley) is awaited a decision from the Secretary of State.
- 5.5 No mention is made in this paragraph of Howbury Park which has been promoted as an SRFI with 198,000 sq.m. of warehousing on a 68.8 ha site. Options also remain for developing rail linked warehousing in the Thames Gateway.
- 5.8 Research was undertaken by the SRA prior to the publication of the SRFI policy document (CD 6.1) in 2004. The status of this document in relation to Government policy is commented upon in the response to paragraphs 3.18 and 4.18
- 5.13 This paragraph endorses Colnbrook, Howbury Park and Cricklewood as possible rail freight interchange sites in the London area.

- 5.14 Comment on the status of CD 6.1 is covered in paragraph 3.18 and 4.18 of this rebuttal.
- 5.19 This acknowledges the need for SRFIs in London and the south east in general and confirms the conclusions in the SRA policy document (CD 6.1) of 2004. It is not proven there is a specific need for an SRFI to be located to the north of London in the Radlett locality.
- 5.20 Possible alternative sites for SRFI s in London and the south east have been identified by Transport for London and are listed in my Proof of Evidence sections 9.4 and 9.14. These are:
- Dagenham (Ford and Hanson sites)
 - Ripple Lane yard
 - Willesden Euro Terminal
 - Cricklewood
 - Colnbrook
 - Howbury Park
 - Alconbury
- 6.3 Radlett is located on the Midland Main Line which is not a core strategic freight route for intermodal traffic or “ the UK’s major trade axis”. The West Coast Main Line is the core rail freight route for traffic from Scotland, the North West and West Midlands. Most rail traffic would need to cross London to reach Radlett and the site is therefore poorly located from a strategic rail route perspective.
- 6.4a This again re-enforces potential options for alternative SRFI sites in London. Neither Transport for London Rail Freight Strategy (August 2007) or the Rail Freight Sites List and Guidance Notes make any reference to Radlett as a potential site. (CD 6.46).
- 6.4d The extract again draws attention to the options of Colnbrook and Cricklewood as well as Radlett.
- 6.4e The Cross –London Route Utilisation Strategy CD 6.6 make a brief reference to Radlett together with Cricklewood, Howbury Park, Colnbrook and Redhill. (paragraphs 4.4.19 and 4.4.21) The RUS specifically states:

“These SRFI proposals need to be taken into account but they are not yet at a sufficient stage of development for the forecast traffic generated to be confirmed”

Paragraph 4.4.20

No more emphasis is placed on Radlett than other potential sites in the Greater London area.

- 6.7 Capacity analysis work presented by the applicant has been related only to the Midland Main Line between Radlett and Brent Curve Junction (Cricklewood). No capacity analysis has been presented for cross London routes which would be critical in defining network capacity for additional freight services to London. Additionally, no account has been taken of the impact of Thameslink and Crossrail schemes on available rail capacity. Both these scheme have been approved by Government and will have a significant impact on the availability of train paths for additional freight trains.
- 6.14 Comments about capacity are outlined in the response to paragraph 6.7. The availability of paths to the north of Radlett has only limited relevance as it is not proposed to provide a north facing connection from the proposed terminal.

6.20 – 6.24

Evidence about capacity has been covered by comments in relation to paragraph 6.7. All the capacity analysis work mentioned in paragraphs 6.20 – 6.24 covers only the MML and analysis was undertaken prior to the approval of Thameslink and Crossrail. Both these projects will generate demands for additional paths for passenger services affecting routes across London and the Midland Main Line. It is not proven that necessary paths for additional freight services will be available.

Network Rail’s letter to Helioslough confirms the position:

“With regard to network capacity, like other infrastructure bodies Network Rail does not as a principle make open-ended guarantees about future capacity.”

6.27 and 6.30

The needs case only makes reference to gauge clearance over the MML and between Cricklewood and Carlton Road Junction. This paragraph states it is now proposed to gauge clear the route between Cricklewood and Acton Wells Junction.

My Proof of Evidence (paragraph 11.6) draws attention to the fact that much of the traffic for Radlett would still need to use specialist low height wagons as the Acton Branch (Acton Wells Junction to Brent Curve Junction) would remain W8 gauge.

The suggestion that the Acton Branch will now be included alters my comments and concerns about gauge enhancement expressed in my Proof of Evidence.

Gauge clearance of the Acton Branch, in addition to the route between Radlett, Brent Curve Junction and Carlton Road Junction, will increase the cost of gauge enhancement and raise further questions about the financial viability of the project. No information has been provided by the applicants about the costs or practicability of the gauge improvements proposed.

It must be clarified and confirmed the applicants propose to fund gauge clearance works to W10 for the following sections:

Radlett to Brent Curve Junction (Cricklewood)

Brent Curve Junction to Carlton Road Junction (including Belsize Tunnel)

Brent Curve Junction to Acton Wells Junction (Acton Branch)

- 6.37 The GB Freight Model is only capable of producing forecasts on a regional basis, not to specific locations or terminals. Hence, forecasts in the SRA policy document Appendix G (CD 6.1) relate to the South East as a whole. No data has been produced which demonstrates a demand for a Radlett terminal specifically.
- 6.38 Comments about the strategic disadvantages of the location of Radlett on the MML are included in the response the paragraph 6.3.
- 6.39 SRFIs located to the west, east or south of London (eg. Such locations as Colnbrook, Dagenham/Barking or Howbury Park) would at least receive some traffic from major ports and the Channel Tunnel without this traffic needing to cross London to reach the terminal. In the case of Radlett, located to the north of London on the MML, all traffic will need to cross London. Even traffic from the north using the WCML will need to travel via London to reach the MML. Radlett is poorly located when compared to other strategic locations to the west, east and south of London or to locations on the WCML.
- 6.53 GRIP stage 1 is a very early definition of a project in line with Network Rail's project assessment and investment procedures. It includes only project outline definition and not any detailed analysis of costs, implications, risks or liabilities. This is entirely in line with a Basic Services Agreement at this stage.

Comment on Proof of Evidence. Need, Alternative Site and Transport Sustainability evidence presented by David Tucker

Reference is to paragraph numbers in David Tucker: Need, Alternative Site and Transport Sustainability Evidence. HS/6.1 Proof of Evidence

- 5.1.5 The Needs Case presented by the applicant proposed a terminal at Radlett would serve the London and South East region as well as the north west sector of London. Demand forecasts for the whole of the south east of 17.1 million tonnes (Needs Case Executive Summary Paragraph 39) were presented as demonstrating demand. This paragraph suggests other locations for SRFI will serve different London regions and therefore the demand and need for a terminal at Radlett is much lower. Forecasts for the north west sector of London alone have not been presented as the GB Freight Model, used as the basis for forecasts, does not define demand below the South East region as a whole.
- 6.5.6 Colnbrook is well located strategically and operationally for rail. The site to the west of London is on the direct rail route from the major traffic generating port of Southampton and can be accessed from the Great Western Main Line.
- 6.5.17 This paragraph states *“if a container arrives at Southampton Docks, it would not be realistic for this container to be taken across London to Shellhaven before being distributed to markets in London”*

However the proposals for a terminal at Radlett would mean the containers arriving at Southampton, the Haven Ports (Felixstowe/Bathside Bay) and the Channel Tunnel would all need to be taken across London to reach Radlett. In addition, traffic arising in the north and travelling via the WCML would also need to be taken across London. This again demonstrates the poor strategic location of Radlett in relation to the principal places from which traffic will originate.

Comment on Proof of Evidence. Policy and Planning evidence presented by Richard Tilley

Reference is to paragraph numbers in Richard Tilley: Policy and Planning Evidence HS/7.1 Proof of Evidence

4.14 Deliverability

There is no technical, physical or engineering reason why a rail connection to the site could not be provided. However, the cost of providing a grade separated connection with a bridge under the Midland Main Line to reach the terminal will be substantial. To this will be added signalling and infrastructure costs and disruption costs for Network Rail and other train operating companies whilst the work is carried out. All these connection costs will need to be borne by the developer. Furthermore the cost of gauge enhancement to W10 to accommodate high cube containers between Radlett and Carlton Road Junction and Acton Wells Junction will also be substantial and need to be met by the developer.

The applicant's case does not provide any estimate of costs for this work. However the experience of Alconbury suggests there would be doubts about the economic viability of the scheme if the proposals for the rail connection and route enhancement were carried out. There is therefore uncertainty about the economic deliverability of the proposals from the perspective of project viability.

If the proposals were to be approved and then not implemented for economic reasons, a constraint would be imposed on any other future proposals for SRFI in the London area. This would result from a potential situation where approval had been given for an SRFI Radlett, but not implemented, which would argue against the economic, business or planning case for further SRFI in the London area to meet the target need of 3/4 SRFI sites.

It is therefore not proven that a Radlett SRFI could be delivered economically and as a result, an approval for Radlett could inhibit the development of further SRFI at alternative sites in the London area.

The provision and completion of the rail connection from the Midland Main Line to the proposed terminal and gauge enhancement work between Radlett and Carlton Road Junction and Acton Wells Junction must be provided before the SRFI is permitted to operate a distribution centre, not only to ensure the rail market is protected but also to prove the economic viability of the project.