

**AGENDA for a special meeting of the DEVELOPMENT CONTROL COMMITTEE in the Council Chamber, County Hall, Hertford on Monday 16 October 2006 at 11.00 am.**

**MEMBERS OF THE COMMITTEE (10) - QUORUM - 3**

N K Brook (Chairman), G R Churchard, D W Cullen, D S Drury, M D R Muir, D A A Peek, E T Roach, E N Singam, W A Storey, J W A Usher (Vice – Chairman).

## **AGENDA**

### **AUDIO SYSTEM**

The Council Chamber has an audio loop system to assist those with hearing impairment. This can be used by anyone who has a compatible hearing aid.

### **PART I (PUBLIC) AGENDA**

Meetings of the Committee are open to the public (this includes the press) and attendance is welcomed. However, there may be occasions when the public are excluded from the meeting - for particular items of business. Any such items are taken at the end of the public part of the meeting and are listed below under "Part II ('closed') agenda".

### **NOTIFICATION OF OTHER BUSINESS**

Members are invited to notify the Chairman of other business which they wish to be discussed by the Committee at the end of either Part I business (open to the public) or Part II business (closed to the public). In so doing the member(s) must state the special circumstances which they consider justify the matter being considered as a matter of urgency.

The Chairman will decide whether the item(s) shall be considered under "Other Business".

### **Report of the Director of Environment**

#### **1. ST ALBANS DISTRICT – APPLICATION FOR RAIL FREIGHT INTERCHANGE : FORMER RADLETT AIRFIELD, NORTH ORBITAL ROAD, ST ALBANS**

[Local Member : A Lee      Adj Local Members : H M Saunders, B Lee & R J Clarkson]

### **OTHER PART I BUSINESS**

Such other Part I (public) business which, the Chairman agrees, is of sufficient urgency to warrant consideration.

### **PART II ('CLOSED') AGENDA**

#### **EXCLUSION OF PRESS AND PUBLIC**

There are no items of Part II business on this agenda but if an item is notified the Chairman will move:-

"That under Section 100(A)(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph \*\* of Part 1 of Schedule 12A to the said Act and the public interest in maintaining the exemption outweighs the public interest in disclosing the information."

**If you require a copy of the report mentioned above or require further information about this agenda please contact Adrian Service, Democratic Services, County Secretary's Department, on telephone no. 01992 555564 or fax. 01992 555518 or E mail : [adrian.service@hertscc.gov.uk](mailto:adrian.service@hertscc.gov.uk) .**

**Please note that full papers have been dispatched to Committee members only.**

**HERTFORDSHIRE COUNTY COUNCIL  
DEVELOPMENT CONTROL COMMITTEE  
MONDAY, 16 OCTOBER 2006, AT 11.00 A.M.**



**ST ALBANS DISTRICT**

**APPLICATION FOR RAIL FREIGHT INTERCHANGE:  
FORMER RADLETT AIRFIELD, NORTH ORBITAL ROAD, ST. ALBANS.**

Report of the Director of Environment

Author: Steve Bailes

Tel: 01992 556293

Local Member: Aislinn Lee

(Adjoining Members: Martin Saunders, Brian Lee, Bob Clarkson)

**1. Purpose of Report**

To inform the Development Control Committee of the above application and for the Committee to determine a response to St. Albans District Council.

**2. Summary**

- 2.1 This application is to develop a rail freight interchange facility at the former Radlett Airfield south of St Albans. Freight would be brought in by rail, mainly from the greater south east region's container ports plus the Channel Tunnel, using a new link from the Midland Main Line. It would be off loaded into warehousing (over 3 million square feet) and then processed, assembled and repackaged before being moved out by road largely to London markets. About half the facility is anticipated to handle rail based freight and the other half freight brought in by road.
- 2.2 12 trains a day (24 in and out) are predicted when the facility is fully operational generating 3,200 HGV movements a day (in and out). In addition there would be 7,000 light vehicle movements daily, employee cars and 'white vans'. The facility would operate 24 hours a day.
- 2.3 The main highway access would be to the north to a new signalised roundabout on the A414 with a second access to the south via a new bypass to Park Street/Frogmore. The two existing roundabouts on the A414 would be improved, with traffic lights installed at the Park Street roundabout and the lights up rated at the London Colney roundabout. The bypass is proposed as a benefit to provide mitigation to existing traffic problems in Park Street and Frogmore.
- 2.4 Employment is forecast at nearly 3,400 employees three quarters being classified as 'process plant and machine operatives'. Nearly half the

staff (43%) is expected to live in London with a further 10% in Luton. Hertfordshire is predicted to provide 40%.

- 2.5 As part of the proposals landscaping, tree planting and improvement works to provide a country park on surrounding land is intended. This is proposed as mitigation for the impact of the SRFI but little detail is provided at this stage.
- 2.6 Most of the development site has been worked for minerals and has been restored at the lower, post extraction, level. It is currently being used for agriculture (grazing) and woodland. The whole of the application site is within the Green Belt.
- 2.7 The application is an outline application to cover siting (which is taken to include demand and local impacts such as noise and air quality), access (both road and rail) and landscaping. St Albans District Council as the local planning authority will determine the application. They intend to do so within the statutory 16-week period at a meeting of the Referrals Committee on 1 November.
- 2.8 The County Council has been consulted as Highway Authority and on aspects such as strategic planning (greenbelt) and environmental/ landscaping/country park issues.

### **3. Conclusions**

Subject to the completion of remaining work on the Traffic Assessment report and other consultations, officers are of the view that the County Council should make the following views to St Albans District Council:

The planning application should be refused because:

- The application has been submitted in advance of a region wide study of potential SRFI locations. It would be premature to permit the development in advance of the findings of the EERA commissioned Regional Freight Strategy.
- The applicant's Alternative Site Assessment is inadequate in being limited to a small sector of the east and south east regions and producing results which appear contradictory.
- An SRFI site to the north of London, such as Radlett, is not well placed to meet the forecast arisings of demand.
- The 'very special circumstances' that are required to warrant permitting this development in the Green Belt have not been demonstrated and the application should therefore be refused.
- According to the applicant's Traffic Assessment, a fully operational SRFI will increase traffic on the A414 by over 10%. As the A414 is already near capacity, the County Council is particularly concerned with the following aspects:

- The safety and congestion aspects of the location and design of the new roundabout on the A414. The proposed roundabout is not large enough to provide sufficient capacity for queuing traffic creating unacceptable safety issues.
  - The increase in traffic on this section of the A414 will be significant and the ability of the proposed traffic lights at the Park Street and London Colney roundabouts to handle the extra traffic is questioned.
  - The amount of traffic to be generated may have been underestimated. There is no guarantee that the SRFI will operate as currently envisaged. The proportion of road based freight operations may increase beyond that anticipated increasing the level of HGV traffic generation.
  - The impact, beneficial and adverse, of changing flows on the A5183. The environmental benefits and disbenefits to the Park Street Bypass are inadequately assessed.
- The application site is poorly located to attract the necessary staff and achieve the potential economic spin-off benefits from an SRFI contrary to the expectations of SRFI locational policy. It will not be of benefit to the Hertfordshire economy and a location in a Regeneration Area would be preferable.
  - The target non car mode share for journeys to work of 35% is considered unachievable on the evidence presented given the widespread residential location of the labour force and the lack of detail on improvements to public transport services to the vicinity of the site.
  - The proposals for Country Park and landscape and ecological improvements intended to mitigate for the losses associated with the development are unacceptable in scale, outcome and detail and the process and funding of a long-term management regime is not determined. No permission should be granted until these matters are satisfactorily addressed.
  - The proposed measures to mitigate the landscape impact of the development are not sufficient compensate for the loss of this greenfield site.
  - The loss of this area of Green Belt is unacceptable because of the impact this would have on the Green Belt area south of St Albans as a whole.

#### **4. Background**

- 4.1 It is government, regional and county council policy to seek to increase the amount of freight carried by rail and water to reduce road freight traffic. If freight is to be carried by rail, whether through the Channel Tunnel, from container ports such as Felixstowe and Southampton, or from other parts of the country, it has to be off loaded at sites for onward transmission by road.

- 4.2 The former Strategic Rail Authority (SRA) considered the implications of growing rail freight traffic. Their Strategic Rail Freight Interchange Policy in March 2004 indicated that the required capacity 'would be met by three or four new strategic rail freight interchanges (SRFI)' in the wider south east region around London (para 6.9).
- 4.3 These sites would enable rail borne containers to be offloaded, unpacked and their contents repackaged (and assembled) for onward transmission by road, a much bigger operation than the traditional rail/road terminal. The site proposed in this application would also handle a considerable proportion of road borne freight for redistribution.
- 4.4 The proposal for an SRFI at Radlett Airfield would be for the first such site in the south east. There are a number in the Midlands, such as DIRFT near Daventry, and one permitted at Alconbury (north of Cambridge) but not yet developed. The SRFI proposed in the south east previous to Radlett, at Colnbrook, Slough, just west of Heathrow, was refused after an appeal in 2002.
- 4.5 The requirements for an SRFI, particularly in terms of the size of site, link to the railway and access to major roads and motorways (radial routes and the M25), are such that there are relatively few areas in the region which could potentially accommodate one. Development company Helioslough have identified the former Radlett Airfield south of St. Albans as having this potential. After some years work, including pre-application public consultations in which local members were consulted, they have now bought forward a planning application.

## **5. The Application**

- 5.1 The proposed development site is the former Radlett Airfield lying between the M25 and the A414 North Orbital Road west of the Midland Main Railway Line (MML) and east of Frogmore and Park Street on the A5183 and the Abbey Rail line. Its most recent use was for the extraction of minerals. (Appendix 1 shows a Map of the site and surrounding area).
- 5.2 The planning application seeks permission for an SRFI comprising 'intermodal terminal and rail and road serviced distribution units' (331,665 m<sup>2</sup> B8 Warehousing including ancillary B1/B2 office accommodation). These would be served by rail sidings linked to the 'slow up' line (the most easterly of the 4 tracks) of the Midland Main Line by a track passing through the existing embankment under the main line and curving back southwards. About half the facility is anticipated to handle rail based freight and the other half freight brought in by road.
- 5.3 Road access would be from a new signalised roundabout on the A414 North Orbital road near Hedges Farm (which would be demolished). The new road from the roundabout into the site would divide, with one

road to serve the site and one to continue along the edge of Frogmore to join the A5183 at a realigned bridge over the M25.

- 5.4 This road would form a Park Street/Frogmore Bypass which would allow traffic calming measures in Frogmore and Park Street and reduce car and lorry traffic through the villages. This is put forward by the applicants as a positive benefit arising from the development.
- 5.5 The applicant forecasts that when fully developed the facility would handle 12 trains a day (24 movements), about 1 train an hour. These would largely arrive from the south via a cross London route though a rail connection for trains from the north could be added later.
- 5.6 This level of operation, the applicant estimates, would generate 3,200 HGV movements over a 24 hour period. 97% would use the new A414 access, 54% turning west to the Park Street roundabout and 43% turning east to the London Colney roundabout.
- 5.7 Employment is forecast at about 3,385 on site employees (including lorry drivers) (1 employee per 100 sq m of warehouse). 68% would be warehouse staff and 74% classified as 'process plant and machine operatives'.
- 5.8 Workers are expected to commute from within 30 minutes drive of the facility, 40% from London and 10% from Luton with 15% from St Albans District. Shift working would reduce the impact on peak hour traffic and 35% of all employees are expected to travel to work by modes other than the car. 7,000 light vehicle movements (employee cars and vans carrying goods) into and out of the site are forecast for the 24 hour period.
- 5.9 Parking provision would be 1,665 car spaces and 617 HGV spaces.
- 5.10 The application is an outline application to cover siting (which is taken to include local impacts such as noise and air quality), access (both road and rail) and landscaping. The development site is 146 hectares of which 86 hectares are proposed for landscaping, including large bunds between Frogmore and the new bypass to mask the views and reduce noise from the development from this aspect.
- 5.11 The proposals indicate major land remodelling to reduce the visual impact of the development from the surrounding area. The submitted drawings however are inadequate to allow critical assessment of the wider impact of the development. More detail should be provided in this respect.
- 15.12 Most of this area has been worked for minerals and has been restored generally at the lower, post extraction, level. It is being used for agriculture (grazing) and woodland.

traffic  
directions

- 5.13 The application also includes 6 other parcels of land in the area (247 hectares), 2 to the north being river valley areas and 4 to east, west and south being former mineral workings. These former mineral workings are now restored though to varying standards that reflect the age of the different sites and the relevant planning requirements that applied at the time for each. Some of the sites are still subject to planning permissions which may provide a basis for achieving their final restoration.
- 5.14 The applicant proposes further landscaping and other works within these areas to provide publicly accessible open land and community forest. They intend to create nearly 250 hectares for Country Park and recreation uses with improved access to the countryside which is offered as a benefit to the local area. However, officers are concerned that no details have been provided that are capable of being assessed or quantified.
- 5.15 The whole of the application site is within the Green Belt. As a restored mineral working the airfield would be defined as a green field site.

## **6. Planning Process**

- 6.1 The application will be determined by St Albans District Council as the local planning authority. They intend to do so within the statutory 16 week period at a meeting of their Referrals Committee on 1 November. The County Development Control Committee is to determine the county's response.
- 6.2 The County Council has been consulted as Highway Authority and on aspects such as strategic planning (greenbelt) and environmental/landscaping/country park issues. The Biological Records Centre and Countryside Management Services have already provided some information to St Albans but a detailed response on some of the other issues will not be possible within the time frame. St Albans are however anxious that the County Council provides at least its initial views in time for inclusion in their Committee Report.
- 6.3 The applicant has provided a large volume of material including an Environmental Statement (ES) and Traffic Assessment (TA). However there remain a number of unanswered questions and uncertainties regarding the proposal. This also applies to the applicant's assessment of alternative sites.
- 6.4 The road and rail issues are particularly complex and the County Council has asked its consultants (Mouchel) to consider some aspects. The two authorities have jointly appointed rail consultants (W S Atkins) to consider the rail issues and the needs case (demand) for the development along with the adequacy of the consideration of alternative sites.



6.5 While the proposal is for a major development of regional importance the Secretary of State has determined it is not a 'major infrastructure project' which should be 'called in' for determination. If St Albans decide to refuse the application however, the applicant is likely to go to appeal at a Public Inquiry.

## **7. Land Ownership Information**

7.1 The development site and the 'country park' area to the west and east are owned by Lafarge Aggregates. Ownership of the development site (Radlett Airfield) will be transferred to the County Council on completion of the restoration of the mineral workings. This was expected to be on 4 September this year but has been delayed slightly.

7.2 The land will be subject to a restrictive covenant, enforceable by Lafarge, requiring no buildings to be erected and the land not to be used for other than Green Belt uses (open space, agriculture etc). This covenant could be changed with the agreement of Lafarge.

7.3 Landownership is not however relevant to determining this planning application which should be considered on its merits.

## **8. Representations**

8.1 The County Council has received a large number of letters (over 125) objecting to the proposal and none in favour. St Albans District Council has received substantially more and, as local planning authority, the representations from local and statutory bodies including EEDA and EERA.

8.2 The major areas of public concern are summarised in a number of letters as:

- At least 3000 extra lorry movements on our already congested road network.
- Another 2500 cars for the employees to the site, also on the congested local road network.
- Twelve 750 metre long freight trains per day on already congested tracks, which when they break down would affect the commuter trains.
- 12 more noisy freight trains, mostly at night – sleep is basic human right.
- The air, noise and light pollution that an operation such as this would inevitably bring.
- Loss of 300 acres of Green Belt land.
- Urbanisation of Radlett to St Albans, and Park Street to London Colney.
- The effect an operation such as this would have on the water table and consequential rivers and streams.

- The fact that St Albans wants to be renowned as an historic market town, not for its International Rail Freight Terminal.
- The fact that properties may be devalued.
- The fact that an operation such as this would change the whole area physically and socially.
- The fact that this would most probably evolve into a "road to road" freight interchange with even more traffic than presently being anticipated.

8.3 Some of the points can be best left to the District Council. The major issues for this Committee are:

- Is the needs case, including the desirability of increasing rail freight, and the consideration of alternative sites sufficiently well proven to demonstrate the very special circumstances necessary to override Green Belt policy.
- Are the provisions to mitigate the impact of the generated traffic, including the Park Street Bypass and the new traffic lights at Park Street and London Colney roundabouts, sufficient to ensure traffic impact on existing and future flows is acceptable.
- Are the proposed landscape improvements and country park provision and management adequate to mitigate against the loss of this area of open land in the Green Belt.

## 9. Strategic Policy Background

9.1 The policy background to the provision of rail freight interchanges is set out at length in the documents supporting the application. The desirability of increasing the carriage of freight by rail to reduce road borne freight and therefore road traffic is a feature of national (Sustainable Distribution Policy 1999), regional (Draft East of England and Draft South East Regional Spatial Strategies) and County (1998 Structure Plan Review and Draft 2003 Alterations) policy.

9.2 The particular demand highlighted for this development is the need to move freight from the regions' container ports, such as those at Felixstowe, Harwich and Southampton, by rail to the main markets especially London. The rail borne containers from the ports and those on trains through the Channel Tunnel then need to be off loaded and their contents often repackaged for onward movement by road. This is a bigger operation than simply transferring the containers to road vehicles and requires large areas of warehousing.

### ***The Development Plan – the Hertfordshire Structure Plan and St Albans District Local Plan***

9.3 Development proposals must be in accordance with the development plan unless material considerations indicate otherwise. The relevant parts of the development plan for the purposes of determining this application are the Hertfordshire County Structure Plan adopted 1998 and St Albans District Plan 1994.

9.4 The County Structure Plan (Policy 30) supports an increase in the use of rail at the expense of road. Rail depots for freight will be supported at suitable locations in the County, taking into account the suitability of the local road network, the relationship with employment uses and the environmental impact. No need was identified at that time for a strategic rail interchange and no site study was carried out so the Radlett location cannot be considered as being in accordance with the current development plan.

9.5 The St Albans District Plan does not refer to rail freight issues.

***National and Regional Rail Freight Policy***

9.6 However, both the Structure Plan and St Albans Local Plan precede national SRA policy and the emerging development plan, comprising the draft East of England Plan and Structure Plan Alterations for the period to 2016. These factors are material considerations in determining the application.

9.7 The Strategic Rail Authority (SRA) in their SRFI Policy March 2004 indicated that the required rail freight capacity in London and South East, as determined by their analysis, 'would be met by three or four new strategic RFI in the region'. The qualitative criteria to deliver this required capacity would mean 'that suitable sites are likely to be located where the key rail and road radials intercept with the M25'.

9.8 With the demise of the SRA the Department of Transport (DfT) took responsibility for rail freight. The DfT determined that much of the interchange policy was still relevant though it has not been adopted formally as Government policy. The DfT Guide for Producing Regional Transport Strategies (RTS) makes clear that 'adequate and suitably located facilities for inter-modal freight interchanges (i.e. facilities for transfer between road vehicles and rail, sea, inland waterways and airfreight) are vital to fulfilling national policy objectives in relation to freight transport.'

9.9 The DfT Guide goes on to say that the Regional Planning Bodies (EERA etc.) 'should consider the best approach to assessing issues and options for freight interchanges as part of the background analysis for the Road Transport Strategy. As a result of necessary analysis (and, where appropriate, appraisal of proposals) the regionally important locations for inter-modal freight interchanges should be identified and safeguarded in the RTS. The RTS should make clear where regional and national needs have to be accommodated within local development and transport plans.'

9.10 This policy background informed the East of England Draft Regional Spatial Strategy (RSS) and Draft Regional Transport Strategy (RTS) and the Examination in Public (EIP). The Panel Inspector has recommended a freight policy (T10) which states:

“provision will be made for at least one strategic rail freight interchange within the East of England, at a location with good access to the strategic rail routes and highway network”.

The regional planning process did not however identify specific sites and locations as required by the DfT nor has it addressed whether the interchange already permitted at Alconbury meets the region's requirements.

- 9.11 The draft South East RSS (Policy T13) requires the Regional Authority to work with other stakeholders 'to identify broad locations within the region for up to three intermodal interchange facilities'. The East of England Inspector in his Report (para 8.23) refers to the SRA identifying a need 'to provide at least one SRFI to serve the northern quadrant of London and destinations within the (East) region' which with the South East would provide a total of three to four SRFIs in the greater region though none in the east.
- 9.12 The SRA March 2004 policy document itself does not state any such geographical requirement which would suggest one site in the north. The SRA expects (para 7.7) that Regional planning policy would 'identify areas where Strategic RFI could or should be developed, or delineate those parts of the region most suitable to Strategic RFI's development'. It goes on to add that 'the essential operating characteristics of Strategic RFI must be integral to allocations for their potential development.'
- East of England Plan Rail Freight Policy***
- 9.13 The recent and ongoing preparation of the East of England Plan has not considered locations or locational criteria for SRFIs in the region. The three Regional Assemblies and Mayor of London and the DfT have not jointly commissioned research to identify the most appropriate approach to dealing with the freight needs of the capital and wider south east. As a consequence there is no technical work available to the development plan processes in London and the two regions on the most appropriate approach to SRI provision in the south east.
- 9.14 EEDA appears to have similar concerns with regard to the lack of an inter-regional perspective. In its response to the application consultation it states that it 'would expect an application of this scale and impact to be supported by and considered within an inter-regional strategic content and assessment of the provision currently or proposed to serve the markets'. This is also the view of County Council officers. While the applicant has done some assessment of sites in the chosen sector (see section 11) the scope of the assessment is too limited and the inter-regional strategic context is completely absent.
- 9.15 Neither has the Regional Assembly, with partners, undertaken any assessment of the range of potential most suitable locations for a Strategic RFI to the north (or east) of London within the Region. EERA

now propose to commission a Regional Freight Strategy to estimate future requirements for interchange facilities within the region and indicate criteria for selection and broad locations for future search for the required development.

- 9.16 It is hoped to have early output on this element of the Strategy to inform EERA's representations on the Proposed Changes to RSS in November 2006. However, County officers are of the view that it will be probably too late in the Plan preparation process for the Government to introduce any such changes to the Plan.
- 9.17 Alterations to the yet to be approved East of England Plan are already underway or programmed to make good existing recognised shortcomings in the Plan, for example in relation to gypsies and travellers and waste issues. The same should apply to the failure of the Plan to consider SRI matters.
- 9.18 Officers are of the view that, in line with DfT RTS guidance, the most suitable locations for strategic rail interchanges to serve the capital and the wider south east region should be explored by robust technical studies taken forward collaboratively by the Mayor of London, the three adjoining regional assemblies and the DfT, covering the entire periphery of the capital. In the absence of this technical work and the findings tested and taken forward by responsible bodies (regional assemblies and relevant district/borough councils) through the relevant aspects of the development plan (regional spatial strategies and local development frameworks) this application must be considered to be premature.
- 9.19 In the absence of a regional study of potential locations the applicant has chosen to concentrate the search for a site in the sector between the M4/Great Western Main Line and the A1(M)/East Coast Main Line (see section 11). While this may meet the overall SRA policy location of three to four sites around London, the policy justification for limiting the search to this area, a small part of the two regions, is questioned.
- 9.20 The northern sector around London is not the area most suited to meet the demand that the applicant has identified. Freight arising from Southampton and the Channel Tunnel bound for London would be better catered for in the west where the rail journey is shorter and does not involve cross-London routes and similarly freight from the Haven Ports and the Thames would be better catered for in the east for the same reasons.
- 9.21 This policy aspect is extremely important in regards to Green Belt policy as well as rail freight policy. The application site is located within the Green Belt so the applicant has to demonstrate that 'very special circumstances' exist to warrant overturning Green Belt policy to permit the development. The applicant has sought to do so quoting the general rail freight policies and the SRA's conclusions regarding the

need for new capacity together with the analysis of sites showing Radlett to be the optimum location.

- 9.22 For the reasons given above officers are not satisfied that there has been a satisfactorily strategic analysis of alternative options around the capital or within the East of England Region. In addition the applicant's findings that Radlett is the optimum location is not accepted (see section 11). Under these circumstances the 'very special circumstances' required for development within this Green Belt location are not considered to have been demonstrated.

## 10. Operational Factors

The proposed Radlett Airfield site does meet some of the criteria referred to by the SRA in that it is well located in relation to the M25 and radial routes to serve London markets. However in rail operational terms it is flawed. The Midland Main Line (MML) is not a major freight route and freight trains to Radlett from the ports, the Channel Tunnel or origins elsewhere in the UK would require access from cross London routes such as the North London line.

Network Rail are of the view that there should be sufficient capacity on the MML for the forecast 12 trains (24 in and out) every 24 hours. With one per hour on average this should not disrupt local services. Network Rail do add however that there remains a 'significant level of work to be carried out' in terms of rail capacity and the existing capacity is to be confirmed. They have also registered concerns on the longer term freight capacity of the London crossings on which Radlett would rely but do not refer to this in their response to the application.

The MML only has a freight gauge of 8 between London and Radlett (and gauge 7 north of Radlett) while major freight lines such as the West Coast Main Line and Great Eastern Main Line have a gauge of 10. This limits the size of container and wagons which can be handled and therefore the potential of the facility.

The applicant refers to improving the gauge between London and the site but there are no details of the work that would be required or where the funding would come from. There are no plans to increase the gauge to the north.

If the proposed gauge improvements are carried out full weight freight trains could access the site via the cross London lines. Trains with origins and destinations elsewhere in the UK, an important element of any policy to increase rail freight nationally and reduce road traffic, would, however, always have to go south to London before continuing elsewhere. (In the initial years all trains would be required to travel towards London as the rail link into the site only operates southwards though there is the potential to provide a northern link.)

The view of the authorities' consultant Atkins is that while the present proposal may be feasible in demand and operational terms it is clearly not ideal in rail terms. There are real concerns that the facility could fail to realise the levels of train borne freight predicted and will then have to attract increased levels of road borne freight further taking on the characteristics of a typical, if very large, distribution warehouse depot.

## **11. Alternative Sites**

11.1 The applicant has carried out a study of alternative sites to the proposal as is required for an Environmental Statement. The applicant has limited this study to the chosen M4 – A1(M) sector and assessed each site against the applicant's own criteria. The best scoring sites were finally re-assessed using the NATA Appraisal Process (the DfT recommended process for assessing transport schemes).

11.2 One hundred alternative sites were identified and tested against three key assessment criteria:

- Adjacent to or within 2km of one of the 5 key rail corridors (Great Western Main Line, Chiltern Main Line, West Coast Main Line, Midland Main Line and East Coast Main Line).
- Good road access, being within 5 km of a major road, namely a main, trunk or primary route.
- Suitable topography and configuration to provide a minimum of 40 ha of developable land.

The series of assessments led to an eventual short list of 6 sites including Radlett for the detailed analysis.

11.3 This assessment does show that there are relatively few sites in this part of the region which are suitable for consideration for such a large and specialised facility and none will be entirely suitable. Beyond that the nature of the first assessments, with a subjective scoring system where one result could then exclude seemingly potential candidates, means that officers are not be satisfied with the soundness the study. A full study of alternatives should involve a full Strategic Environmental Assessment as part of the plan making process rather than the limited Environmental Assessment the applicant has chosen to adopt.

11.4 As an example of the weakness of the applicant's study is the inclusion as one of the 6 final sites of Hunton Bridge, Abbots Langley, located immediately south of the M25 junction 20 with the A41 and between the two roads. While like Radlett this would be well located for the major roads, development would involve a rail link from the West Coast Main Line across the Grand Union Canal, across the Gade River floodplain and the A41 and then serious earth moving to provide a flat site north of the Grade 2 listed Langleybury church.

- 11.5 It is difficult to see this site as a serious contender but it has come through ahead of others which seem to have a serious claim. One such is at Sundon immediately north of Luton where there is flat agricultural land and a disused chalk quarry (albeit valued ecological/recreation land) adjacent to the MML.
- 11.6 It would seem the applicant has overlooked the fact that the new M1 junction 11A is to be developed at Sundon vastly improving the site's access though this still might not have led to short listing. The applicant also has not noted that the landowner is actively promoting the site for a SRFI (representation to St. Albans DC).
- 11.7 Sundon shares some of the locational disadvantages of Radlett being north of London on the MML and has some benefits (Luton is a regeneration area where the jobs would be of greater value) and no doubt some disbenefits. The issue at this stage is not whether Sundon is better or worse than Radlett but that the applicant's process and reasoning appears questionable.
- 11.8 One further site(s) should be mentioned. At Colnbrook, Slough, south of the M4 and immediately west of Heathrow Terminal 5 the applicant has assessed 2 adjacent sites which appear to have much in common with Radlett. They have good access to the GWML (and therefore Southampton and the Channel Tunnel) and are close to the motorway network (M4/M25). Like Radlett they are in the Green Belt and have an important recreation use and landscape/gap function so the similarities would suggest they should be short listed.
- 11.9 These sites were however previously proposed for the development of an SRFI and the proposal (LIFE) was refused after an appeal in 2002. The Radlett applicant's assessments do not make it clear why Radlett is sufficiently superior to Colnbrook to warrant planning permission when it has been refused at a seemingly similar site elsewhere.
- 11.10 The applicant concludes (Technical Report 6 para 7.8) that 'there are no superior sites' in terms of key assessment criteria and on this basis 'it has been demonstrated that the former Aerodrome site provides the optimum location for a Strategic Rail Freight Interchange serving the North West Sector of M25'. This conclusion however is not considered by officers to be sufficiently justified from the evidence supplied and is not accepted.
- 11.11 It is not the role of the County Council in considering this application to put forward alternative sites whether in this county or elsewhere. However it is apparent that there are other sites for consideration in any comparison with Radlett. This strengthens the view that a fuller strategic assessment of sites in the region should be carried out and that the applicant's study is insufficiently rigorous.



## **12. Economy and Employment**

- 12.1 An SRFI requires a large work force and the SRA in their 2004 policy refer to the presence of an available and economic workforce as an 'increasingly important determining (locational) factor' in the effective siting of such facilities. 'When major distribution facilities can employ well in excess of 1,000 people, the economics of access to a reliable and skilled workforce, employable at economical cost, is of high importance' (Paras 4.26 and 4.27 SRA SRFI Policy March 2004).
- 12.2 The Policy document goes on to comment on the potential for locating further employment uses near to an SRFI. In this respect it says SRFIs should be seen not simply as rail specific activities 'but a key element of spatial planning for employment development'. The Park Street, St Albans area is clearly not an area where the County Council would encourage major employment growth nor does it offer a workforce to service one.
- 12.3 The applicant estimates that when the proposed facility is fully operational the level of on site employment generated will be 'about' 3,385 jobs. This is based on a job to floorspace to ratio of 1 to 100 sqm which is probably a reasonable basis for this type of forecast.
- 12.4 68% of the total would be classified as warehouse staff, 11% administration or support staff, 7% managerial and 13% drivers. 74% of workers (2500) would be classified as "process, plant and machine operatives".
- 12.5 Clearly this is a large number of relatively low skilled jobs which would be welcome in many parts of the country including those areas in need of regeneration elsewhere in the East of England. However in this part of Hertfordshire with its low unemployment rate (1% in St Albans) and high skill levels (3.67% of workers in St. Albans District are process, plant and machine operatives compared with 8.42% in England – 2001 Census). Such numbers cannot be sourced locally to Radlett or in the surrounding area.
- 12.6 The applicant recognises this and suggests staff would be drawn from the area within 30 minutes drive time of the site. This wide area extends across north London and up to Luton and has a total population of 2.8 million with 64,000 unemployed and 79,000 process, plant and machine operatives. With this labour pool therefore the applicant's claim that the Radlett facility would have no problem attracting the 3,385 staff required.
- 12.7 34% of workers (1,164) are estimated to come from Barnet, Brent, Enfield and Harrow, 10% (331) from other parts of London and 10% (350) from Luton. Just 14% (477) are estimated to live in St Albans town, Park Street/Bricket Wood/Colney Street and London Colney, with nearly 6% (194) in Watford.

- 12.8 If these figures are taken at face value it means that the development would have little direct benefit to the local area. Most of the St Albans based workers could be expected to be changing jobs rather than being added to the workforce given the low level of unemployment. It also means a distribution of workers with the majority living towards the edge of a 30 minute drive time area rather than the more normal one where workers are concentrated nearer to their place of work with concentrations reducing further away.
- 12.9 No evidence is presented to show such commuting patterns are in fact likely to occur. There is presently much cross commuting between southern Hertfordshire and north London but the distance travelled, particularly by this occupation group is an issue. Borehamwood draws 22% of its workplace population from Outer London but only 4.5% of in-commuters are in this occupational category. Welham Green (south of Hatfield and about a similar distance to London as Radlett) has a high (for Hertfordshire) proportion of in-commuters in this category (12.9%) but it draws only 6.8% of its total workplace population from Outer London.
- 12.10 If the proposed distribution, skewed to London and Luton, were to be realised, however, it would have important implications for journeys to work. Aside from the extra distance travelled and the fuel consumption and greenhouse emissions a widespread workforce is more difficult to service with non car options for travel. These issues are considered in the employee access section (14) below.
- 12.11 Since the mid nineties, Hertfordshire's economic policy (eg. the Bright Green industrial strategy) has promoted the development of knowledge-based employment in order to best balance economic growth and the protection of the environment. A development which provides only 1 job per 100 m2 of warehousing with almost three quarters being in the 'process, plant and machine operatives' category runs totally contrary to this approach. It is also a profligate use of land in this highly constrained part of the region.

### **13. Highways and Transport Issues**

Traffic generation, and the impact it will have on what are seen to be already congested local roads, is probably the aspect of greatest concern to local people. The applicant has produced a Traffic Assessment report (TA) showing how they see the traffic being assimilated and this is being considered by the County Council as Highway Authority.

This work is not yet completed. The Council has asked its in-house transport consultants Mouchel to consider aspects including comments on the detailed highway design, a feasibility safety audit and checking the traffic signal calculations and capacity assumptions. The Council

as Highway Authority will respond to St Albans as soon as they are in a position to. The report to this Committee therefore is based on the work done so far.

The principal access to the site would be from the A414 with a new signalised roundabout constructed near to Hedges Farm. The A414 is a primary route, 'detrunked' in 2003, but still the highest level in the county strategic route network. The County's Local Transport Plan (LTP) has a presumption against new access points on the primary route network.

When not congested this is a fast stretch of the A414 with a record of accidents, though not as many as at the two roundabouts at either end, Park Street and London Colney. There would therefore be safety issues for any design of this complex new junction. The initial views of the County's consultants is that that proposed is not large enough to provide the required capacity.

Traffic generation will result from the HGVs moving the freight from, and to, the facility, the employee's cars and a range of 'white vans' both carrying freight and servicing the site. The main access will be from the new roundabout on the A414 with a lesser access largely for cars and vans to the south to the A5183, the link between them forming a bypass to Park Street and Frogmore.

The applicant estimates that when the facility is fully operational traffic generation will be:

	Traffic Generation (vehs)		
	Light Vehicles	HGV's	Total
AM Peak (0800-0900)	494	202	696
PM Peak (1700-1800)	491	185	676
24 Hour AADT	7,057	3,197	10,254

Predicted figures for other hours, including those where the employee shifts change (06.00, 14.00 and 22.00 hours), have not been made available.

The figure for HGVs is based on operations at the DIRFT site in Daventry, a successful rail based freight interchange, and at Magna Park, a major road based distribution centre. The estimates for Radlett assume that about half the facility is used for rail based freight and the other half for road based (road in, road out) freight. Of the forecast 3,197 HGV movements 1,126 are estimated as rail related and 2,071 road related. There is no certainty the facility will be half rail and half road and any increase in the proportion of road based freight will cause a disproportionate increase in HGV movements.

It is also quite possible the operation could seek to expand in the future. This would require a new planning permission but this might be difficult to refuse once the proposed development is in place. Expansion would inevitably increase forecast traffic generation.

The figure for light vehicles includes both employee cars and white vans. No breakdown is provided in the Environmental Statement (ES Chapter 1) but 65% of employees are assumed to travel by car with a maximum demand for 1665 parking spaces. 3,000 workers a day would therefore generate 2,000 employee car journeys (4000 in and out) the majority arriving and leaving when the shifts change (06.00, 14.00 and 22.00 hours).

The County Council has serious doubts whether the site could achieve a car mode share as low at 65% (see below section 14). It is not clear however how this mode share is reflected in the applicants' traffic figures which are being used for initial tests on the impact on roads.

The majority of the traffic is predicted to use the A414 access, 97% of the HGVs and 67% of the light vehicles. If this were a constant proportion the flows onto/from the A414 would be:

	Light Vehicles	HGV's	Total	Existing Flows
AM	331	196	527	4372
PM	329	179	508	4528
24	4728	3101	7829	55830

The A414 is already an extremely busy road with flows on this section some of the highest non motorway flows in the county. The applicant shows that with a fully operational SRFI the traffic would add around 12% to existing flows on the road. Typically a traffic increase of 5% is considered to be a material increase and therefore this development is likely to have a significant impact on the road network. The implications in terms of congestion (additional time taken to travel this section of road) are not clear from the applicant's submission.

The forecast overall percentage increase at the Park Street and London Colney roundabouts is less because of the traffic on the other arms. The applicant has forecast the increase in flows at the London Colney roundabout in the pm peak in 2011 at 8% on the A414 west arm and at 4% for the whole roundabout. The 2011 pm peak figures for the Park Street roundabout are 8% for the A414 and 6% for whole roundabout.

To handle the traffic the applicant intends to introduce traffic lights onto the 3 major arms of the Park Street roundabout and to improve those on the London Colney roundabout (upgrade the system). Technical work continues to assess the applicant's figures

and the impact of the new roundabout and the traffic signals. At present officers are not satisfied that the solutions offered will prove acceptable in either congestion (capacity) or safety terms.

Traffic implications beyond the two roundabouts are also important. The Highways Agency (HA), who have also been consulted, is concerned about those junctions where the traffic joins the trunk road network, Junctions 21A and 22 on the M25 and Junction 3 on the A1(M) (also a concern of Welwyn Hatfield DC). The HA have issued a Holding Objection subject to further technical work being undertaken. As Highway Authority the County Council is in discussion with the HA regarding traffic conditions generally.

As well as the reliability of the traffic predictions and the technical aspects of the roundabout design and operation there is a further issue regarding the anticipated growth in existing flows on the A414. The applicant has used a standard growth formula to estimate flows in 2011 but this approach does not take account of the specific changes relevant to this stretch of the A414.

Work by the HA for the RSS Examination in Public showed there were anticipated to be specific congestion issues in the future in this part of Hertfordshire and on the A414 in particular. Since the Examination in Public the proposed housing growth at Hemel Hempstead and Hatfield, either end of the road, has increased substantially which will add to demand. In addition while the M25 is to be widened to 4 lanes the HA intend to introduce management measures which could limit access to the motorway in peak times adding to traffic on this stretch of the A414 as the alternative route.

Of course when the M25 is congested or closed by an accident traffic will always use the A414 as many letters of representations have pointed out. The County Council is aware of the difficulties created for local residents when the M25 is congested.

An important element of the proposal is the bypass for Park Street and Frogmore. This is put forward as a positive benefit of the development as it will reduce traffic, including the existing heavy goods traffic, through the villages and allow traffic calming measures to enhance the local environment. Some of these benefits, the reduction in road noise for instance, are used by the applicant as a trade-off for the impacts of the development, for instance the increase in noise levels at some dwellings.

The bypass as proposed leaves the A5183 south of Frogmore on a realigned bridge over the M25 (subject to further discussion with the HA) to join the A414 at the new access roundabout. The existing road would be traffic calmed to discourage through traffic.

For traffic which previously used the road from St Albans to Radlett etc. via the Park Street roundabout this diversion might seem overly long. It should be possible to enforce the exclusion of HGV through traffic from Park Street and Frogmore but the impact on HGVs which wish to use Harper Lane, the B556, to access M25 Junction 22 and on car movements is less clear. There have already been a number of local improvements to alleviate the impact of existing traffic on the A5183.

The applicant has assumed following a survey that about 85% of the existing traffic through Park Street/Frogmore would use the bypass. The applicant estimates that the existing flows of 12,000 vehicles a day (12 hours) will reduce to 2,000 but the method of prediction is unclear. The reduction could be being over estimated, particularly as the new route is not particularly direct for those travelling on the corridor to and from St Albans and there will be scope for additional 'rat running'. Some of the environmental benefits for the village may therefore be exaggerated.

In addition the applicant appears to have given no consideration for the potential of the bypass to cause other rerouting by drivers. For some it will increase the attractiveness of the A5183 route through Radlett village and Elstree towards the A41. These cars would be in addition to the SRFI light vehicle traffic using the route.

Existing flows on the A5183 south of Radlett village are about 10,000 per (16 hour) day. Congestion is particularly bad at Elstree in peak hours. The majority of the forecast SRFI traffic using the southern access (33% of the light vehicles, employees and vans, 2,350 per 24 day) would travel outside the peak hours but the environmental implications of a potential 20% increase in traffic in Radlett and Elstree have not been addressed by the applicant.

A bypass for Park Street and Frogmore may prove to be an environmental benefit for those villages. However significant further work would be required to determine the true level of benefit and the extent of the disbenefit elsewhere.

The traffic issues need further consideration by the County Council in consultation with the HA before a final Highway Authority response is made. Members will be updated on the situation at Committee. At present officers are of the view that:

- The design of the new roundabout on A414 will be inadequate in terms of congestion and safety to acceptably handle the forecast traffic generation.
- Traffic queues at the 2 existing roundabouts even with the proposed traffic lights will increase to the detriment of existing users.

- The forecast traffic levels of the SRFI could be underestimated increasing the potential impact and changes to the assumed origin/destinations could further affect the predicted impacts.
- The benefits in terms of traffic reduction and traffic calming measures of the Park Street/Frogmore Bypass may be overestimated as the level of local and remaining through traffic is likely to be greater than predicted.
- There will be environmental implications for Radlett and Elstree villages on the A5183 arising from the increase in traffic associated with this development and these should have been addressed by the applicant.

#### **14. Employee Access**

The applicant states in his Environmental Statement (ES) (Chapter 1 – Transport) that to meet the PPG13 transport policy requirements appropriate arrangements will be made for providing good access to the development for employees by non-car mode. It is part of the applicant's case promoting Radlett that the site is "accessible" for employees.

The site appraisal under 'Access to the Transport System' states:

- 67% of potential employee catchment areas are served by existing public transport to the vicinity of the site, and comments:
- Existing public transport services are to main centres of employee catchment and run on average two or more times per hour.

The ES states that 'a consequence of this level of accessibility is the ability of the site to have high targets for non car modes'. This view leads to the assumption that with appropriate arrangements, largely provision of shuttle buses, a non car mode share of 35% can be achieved for employees travelling to work.

This conclusion is unrealistic and is not accepted by officers as there is no evidence that the practical difficulties can be overcome. In addition the existing accessibility has been grossly over estimated by including more distant services, such as the Midland Main Line and Thameslink, which should not be considered as being 'in the vicinity of the site' as they would require a change of mode (bus) to service the development.

Public transport to the 'vicinity' of a site is normally assumed to mean services that can actually serve the site direct. For local bus services this means 400m and for a railway station normally 800m. Leaving aside the issue of the nature of this development (it is nearly a mile in length and would presumably need an internal transport system for non car borne employees) the existing services meeting the criteria are the Abbey Rail line (Watford to St Albans Abbey) at Park Street station,

and the 655 bus route Borehamwood to Hatfield along the A5183. To suggest these services serve 67% of potential employee catchment areas, while possibly true if sufficient changes are made, is not credible in practical terms.

At present neither service would meet the shift pattern of employees (0600/1400/2200 hours). The applicant has provided no information as to whether either operator would extend operations to meet these hours and this is of particular importance for rail. Even if trains were run to meet the shift pattern capacity limitations on the line mean that the service level is limited to one train every 45 minutes.

Capacity could be increased by installing a loop at Bricket Wood and this is included as an option in the DfT's draft franchise specification (West Midlands) with the new franchise to start in November 2007. If taken up this would allow trains to run every 30 minutes. It is unclear whether the applicant is expecting this loop to provide a service usable by shift workers.

The applicant intends to increase site accessibility by providing shuttle buses notably from St Albans mainline station which is otherwise only linked to the site by a 13-16 minute/2.5 mile journey on the 655 bus. The County Council does not normally support 'staff' shuttle bus services as these do little to promote sustainable transport on a user basis. The preferred alternative is to upgrade and add to local bus services but the applicant does not appear to have yet discussed this with the local bus operators or have particular improvements in mind.

The applicant also suggests there is potential to have pool bicycles at Park Street Station to allow rail users to cycle to the site and leave it for someone else to cycle back. This is a novel idea but its practicality has yet to be demonstrated.

If the development were to go ahead the County Council would wish to see non car access promoted and would expect the developer to commit funding to this. From the evidence presently available however it considers a target of 35%, however laudable, to be extremely unlikely to be reached. The practical accessibility of the site from the widespread area of anticipated employee residence has been grossly over-estimated.

It might be noted that one improvement which would increase accessibility would be the provision of a new station at Napsbury. The developer has ruled this out of his proposals but has stated that his application would not prevent a new station being built.

## **15. Landscape Ecology and Country Park Recreation**

**15.1** Over half of the total application area is dedicated to providing publicly accessible open space and other areas of community forest. The



indicative proposals include new areas of woodland and managed countryside, a Country Park visitors centre and picnic areas, improvements to existing footpaths and provision of new ones, nature trails and cycle routes, equestrian facilities, playing pitches and enhancement and creation of new habitats.

- 15.2 Much of the proposed Country Park area is agricultural grazing land with established footpaths and bridleways allowing public access to the countryside. Although there are improvements as indicated above, they are not as significant as indicated on the plan, as much of the landscaping shown is in fact already in existence. Many of the new footpaths and bridleways indicated cross private land and may not be achievable.
- 15.3 The proposed Country Park is also not shown as a single entity, rather as a series of disjointed land parcels. Four of the application areas (Areas 5,6,7 and 8) could be perceived as being remote and separate sites with uncertain linking connections.
- 15.4 The SRFI itself will represent a considerable built development that will occupy a large area of Green Belt and have (at minimum) locally significant ecological impact. The loss of this land will mean a loss of an important area of open land, which is part of the gap extending south from St Albans to London. The Green Belt in this area is already disjointed by development and further degradation should be avoided.
- 15.5 The information on the proposed countryside improvements listed above by which the applicant intends to mitigate for the loss of the land is insufficient. The Hertfordshire Biological Records Centre has identified a number of specific problems in their response to St. Albans. These include:
- The loss of Hedges Farm and the airfield site will end the *grazing regime* which is essential to maintain the ecological value of this area and particularly the river valley Wildlife Sites to the north.
  - Inappropriate tree planting is suggested on grasslands of importance.
  - Public access is suggested for areas of ecological importance which will increase disturbance in sensitive areas.
  - The *future management systems* for the Country Park and of the ecological areas have not been clarified.
- 15.6 In addition the physical improvements intended for the Moor Mill part of the Country Park (Area 5), the site immediately west of Frogmore, are not clear. If the area is to be made suitable for increased public access it may need improvement through landraising.
- 15.7 The quality and source (the development site or elsewhere) of any material has not yet been identified although the applicant refers to the

possibility of surplus soils arising from the airfield. It would however involve major movement of material which would add to the initial vehicular movements anticipated as part of the construction process. As a result, there is no certainty whether the work on Moor Mill could go ahead acceptably if it were required.

- 15.8 One existing bridleway crosses the north end of the site. This would have to cross the bypass/access road but the applicant's proposals for it are unclear other than in terms of slight relocation of alignment away from the site.
- 15.9 While the present proposals are unacceptable, environmental benefits could be obtained from suitably revised proposals. There is potential for improving past restoration, tree planting, public access, recreation, ecological and other environmental benefits but critically subject to an adequate long-term management regime and funding.
- 15.10 However the mitigation for the loss of the greenfield site as presently proposed is not considered sufficient in scale, outcome or detail to provide adequate levels of compensation for the SRFI developments. In addition the loss of this area of Green Belt is unacceptable because of the impact this would have on the Green Belt area south of St Albans as a whole.
- 15.11 The application does not address the critical measure of openness, which is a crucial aspect of the Green Belt. Whilst there may be improvement in landscape quality, there will be a loss of existing open landscape, some 100 Ha, through the construction of five massive buildings and associated infrastructure.

## **16. Other Issues**

- 16.1 The application raises a number of issues, such as those regarding visual amenity, impact on landscape character, tree loss, noise, air pollution and light pollution. These are matters for the District Council.
- 16.2 If permission were granted there would be a need for detailed section 106 agreements on a wide range of issues ranging from public transport provision to country park management. In addition as part of any detailed permission there would be local sustainability issues such as disposal of waste, grey water and so on.

## **17. Conclusions**

- 17.1 It is national, regional and county policy to support the increase in the carriage of freight by rail in order to reduce the amount carried by road. If freight is to be carried by rail it normally has to be off loaded at an interchange site to be delivered to its final destination by road (or in some cases by rail).

- 17.2 The SRA in March 2004 determined there would be a need for three to four strategic regional freight interchanges around London. This policy has been accepted by the Department for Transport but there has been no study into potential locations for such development. The MML is not a major freight line.
- 17.3 The proper strategic planning processes for determining the most appropriate locations or broad locations to meet the need for SRFIs have either failed to consider appropriate locations or have not yet taken place. The three regional assemblies around London, together with the Mayor of London and the DfT are the responsible bodies for undertaking appropriate technical work and coming to conclusions on how best to meet the SRFI needs of the wider south east. Those conclusions should be then tested through the development plan process, regional spatial strategies, the London Plan and Local Development Frameworks. This has not taken place and as a consequence this application is considered to be lacking sufficient support through due planning process.
- 17.4 The criteria for SRFIs, proximity to a main rail line and to major roads and motorways, mean there are few suitable sites in the wider south east region and all will have some disadvantages. The applicant for the Radlett proposal has carried out a study of alternative sites in the M4 to A1(M) sector and declared that Radlett is the optimum site. Officers however are of the view that this study is not robust and should encompass a wider area.
- 17.4 Officers are also of the view that a location to the north of London is not that preferred to handle the anticipated demand for rail freight which is forecast to arise largely from the Haven and Thames ports and Southampton and the Channel Tunnel. For these reasons the 'very special circumstances' that would be necessary to warrant the release of this Green Belt site are considered not to have been adequately demonstrated by the applicant.
- 17.5 Employment generation will be far greater than the level the local area or even southern Hertfordshire could supply. Employees are predicted to commute from a wide area, over 50% from north London and Luton, which will add to congestion and there will be little local economic benefit from the development.
- 17.6 At the same time there will be little opportunity to realise any spin off employment benefits from the operation. It is the view of officers that an SRFI would be better located where it can help regional policies for regeneration, in the Thames Gateway or at Luton for instance.
- 17.7 Traffic generation and its impact on the already congested roads in the St Albans area is the issue of most concern to local people and the County Council. Technical work has not yet been concluded but to

date officers are not satisfied that various aspects have been adequately addressed. These include:

- The safety and congestion aspects of the location and design of the new roundabout on the A414.
- The ability of the proposed traffic lights at the Park Street and London Colney roundabout to handle the extra traffic.
- The amount of traffic to be generated and in particular the potential for an increase in road borne freight movements.
- The impact, beneficial and adverse, of changing flows on the A5183.

- 17.8 A bypass to Park Street is offered as a benefit arising from the development. It would mean existing through HGV traffic could be banned from passing through the villages of Park Street and Frogmore and traffic calming measures installed to bring environmental improvements to the villages.
- 17.9 The level of benefit in terms of reduction in traffic has not been proven. In addition the impact on Elstree and Radlett has not been determined by the applicant, both from the extra SRFI traffic and from any increase in the A5183 corridor as a result of the opening of the bypass.
- 17.10 Work on assessing the transport implications of the proposal are still underway. Initial views are that the proposed development will have a significant impact on traffic on the highway network and the County Council is not convinced at this stage that the proposed mitigation measures are adequate to address the problems.
- 17.11 A development the size of the proposed Radlett SRFI will inevitably mean the loss of open greenfield land and have an ecological impact. The applicant seeks to mitigate this by proposing landscape and recreational improvements over a large area forming a Country Park for public access.
- 17.12 The proposals however are not sufficiently detailed and the management processes not sufficiently determined for the suggested mitigation to demonstrate it would adequately compensate for the loss of open greenfield land. The Green Belt in this area is already disjointed by development and further degradation which would harm its important 'gap' function should be avoided.
- 17.13 Subject to the completion of remaining work on the Traffic Assessment report and other consultations officers are of the view that the County Council should make the following views to St Albans District Council:

The planning application should be refused because:

- The application has been submitted in advance of a region wide study of potential SRFI locations. It would be premature to permit in advance of the findings of the EERA commissioned Regional Freight Strategy.
- The applicant's Alternative Site Assessment is inadequate in being limited to a small sector of the east and south east regions and producing results which appear contradictory.
- An SRFI site to the north of London, such as Radlett, is not well placed to meet the forecast arisings of demand.
- The 'very special circumstances' that are required to warrant permitting this development in the Green Belt have not been demonstrated and the application should therefore be refused.
- According to the applicant's Traffic Assessment a fully operational SRFI will increase traffic on the A414 by over 10%. As the A414 is already near capacity the County Council is particularly concerned with the following aspects:
  - The safety and congestion aspects of the location and design of the new roundabout on the A414. The proposed roundabout is not large enough to provide sufficient capacity for queuing traffic creating unacceptable safety issues.
  - The increase in traffic on this section of the A414 will be significant and the ability of the proposed traffic lights at the Park Street and London Colney roundabouts to handle the extra traffic is questioned.
  - The amount of traffic to be generated may have been underestimated. There is no guarantee that the SRFI will operate as currently envisaged. The proportion of road based freight operations may increase beyond that anticipated increasing the level of HGV traffic generation.
  - The impact, beneficial and adverse, of changing flows on the A5183. The environmental benefits and disbenefits to the Park Street Bypass are inadequately assessed.
- The application site is poorly located to attract the necessary staff and achieve the potential economic spin-off benefits from an SRFI contrary to the expectations of SRFI locational policy. It will not be of benefit to the Hertfordshire economy and a location in a Regeneration Area would be preferable.
- The target non car mode share for journeys to work of 35% is considered unachievable on the evidence presented given the widespread residential location of the labour force and the lack of detail on improvements to public transport services to the vicinity of the site.
- The proposals for Country Park and landscape and ecological improvements intended to mitigate for the losses associated with the development are unacceptable in scale, outcome and detail and the process and funding of a long-term management regime is not determined. No permission should be granted until these matters are satisfactorily addressed

- The proposed measures to mitigate the landscape impact of the development are not sufficient compensate for the loss of this greenfield site.
- The loss of this area of Green Belt is unacceptable because of the impact this would have on the Green Belt area south of St Albans as a whole.

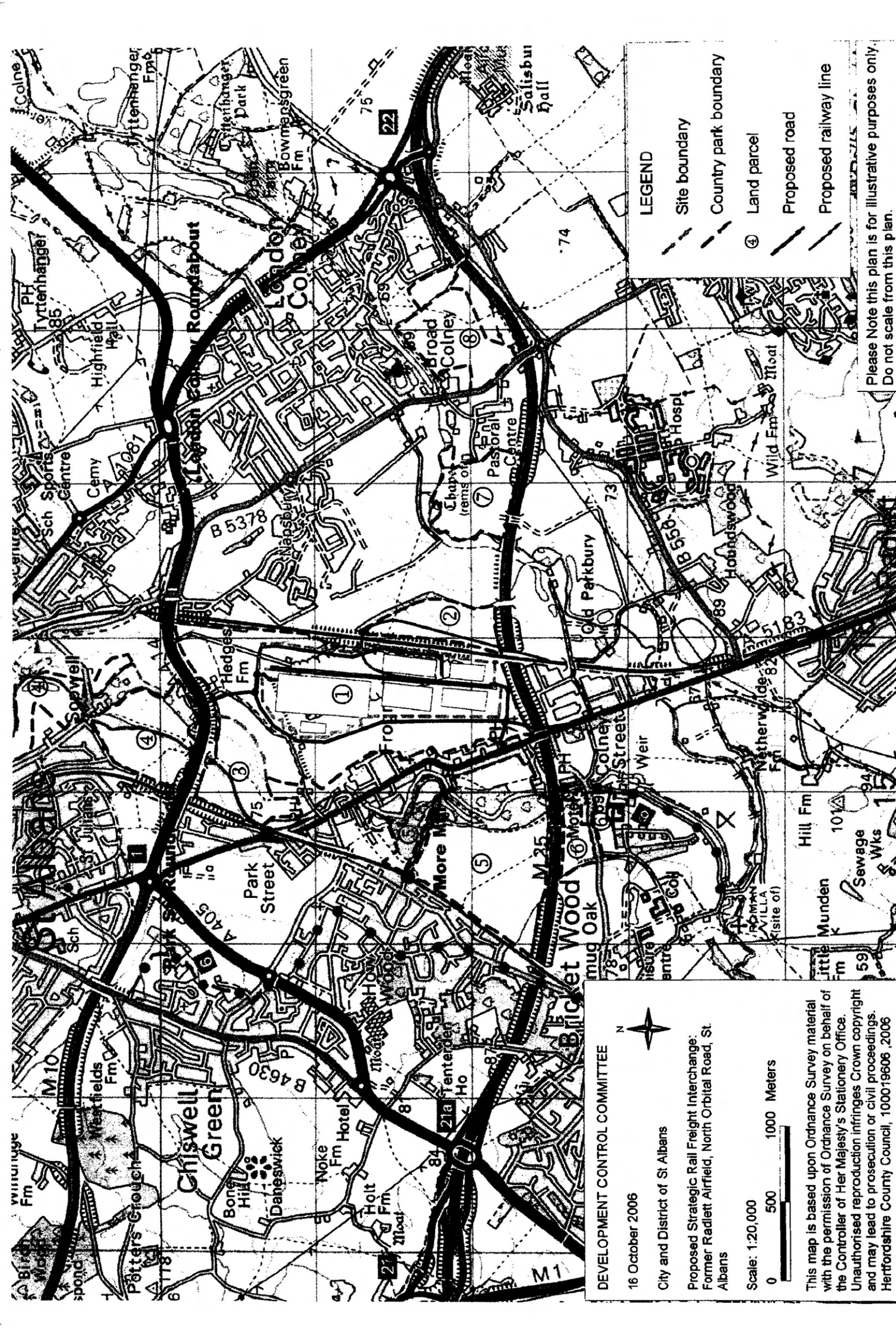
17.14 In summary the applicant has failed to demonstrate that a variety of issues have been satisfactorily dealt with in the application as presented and therefore the County Council should recommend to St Albans District Council that the application should be refused. The District Council could defer determination and require further information from the applicant or refuse it and let the applicant appeal to the Secretary of State. In the absence of a region wide study of potential locations an application of this strategic nature should be determined following a Public Inquiry.

## **18. Financial Implications**

18.1 There are no known additional financial implications for Hertfordshire County Council arising directly from this report. However, if the application is refused by St Albans in line with the recommendations of this report, a Public Inquiry is likely to take place which would mean significant extra cost, although this will only have implications for the department's wider service delivery if this exceeds the amount set aside as a provision in the balance sheet for public inquiries.

### **Background Papers**

Planning Application SADC/5/06/1680 and related documentation



**LEGEND**

- - - Site boundary
- - - Country park boundary
- ④ Land parcel
- - - Proposed road
- - - Proposed railway line

Please Note this plan is for illustrative purposes only.  
Do not scale from this plan.

**DEVELOPMENT CONTROL COMMITTEE**



16 October 2006

City and District of St Albans

Proposed Strategic Rail Freight Interchange:  
Former Radlett Airfield, North Orbital Road, St.  
Albans

Scale: 1:20,000  
0 500 1000 Meters

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20 October 2006

**To:** Members of the Development  
Control Committee  
Chief Officers

**From** COUNTY SECRETARY'S  
DEPARTMENT

**Ask for** Adrian Service  
**Ext** 25564  
**Minicom** 6611  
**My Ref** AS/  
**Your Ref**

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**SPECIAL DEVELOPMENT CONTROL COMMITTEE  
16 OCTOBER 2006  
MINUTES**

**ATTENDANCE**

**MEMBERS OF THE COMMITTEE**

N K Brook (Chairman), G R Churchard, D W Cullen, D S Drury, M D R Muir, D A A Peek, E T Roach, E N Singam, W A Storey, J W A Usher (Vice - Chairman).

**ALSO IN ATTENDANCE**

N E Agar, D A Ashley, D Beatty, R J Clarkson, R I N Gordon, B N W Hammond, D J Hewitt, A Lee, B Lee, D B Lloyd, S J Pile, H M Saunders.

Upon consideration of the agenda for the Development Control Committee meeting on 16 October 2006, as circulated, copy annexed, action was taken or decisions were reached on individual items as recorded below.

**1. ST ALBANS DISTRICT – APPLICATION A RAIL FREIGHT INTERCHANGE;  
FORMER RADLETT AIRFIELD, NORTH ORBITAL ROAD, ST ALBANS**

[Officer contact : Steve Bailes

Tel : 01992 556293]

Mr S Hoare on behalf of the applicant [Helioslough] made a presentation supporting the planning application. In response to the statement made in the final sentence of paragraph 5.14 of the submitted report, he stated that the applicant intended to fund landscaping and other works to the proposed public accessible open land and community forest as part of the development. He also stated that discussions were continuing with the Highways Agency and Hertfordshire Highways concerning the associated highway proposals.

Ms C Bolshaw representing STRiFE [Stop the Rail interchange Freight Expansion] made a presentation opposing the planning application.



The Assistant Director of Environment (Strategic Planning & Partnerships) advised on strategic planning issues relating to this outline planning application which needed to be taken into account and ahead of any regional analysis or study into the location of rail freight interchanges this application was seen to be premature.

The Head of Transportation Planning & Policy outlined the likely effect that this proposed rail freight interchange would have on highways in Hertfordshire especially in the Radlett, Park Street and London Colney area. He also commented on some of the current restrictions on rail freight movements that currently exist. *These include the freight gauge limits south and north of Radlett which would limit rail freight movements due to the size of the larger containers being transported by rail not being able to pass through some narrow tunnels and bridges.* He stated that another major concern about this proposal was the actual amount of additional vehicular movements that would be generated with the likelihood of more road based freight than anticipated being handled plus the proposed modal split of 65% private cars and 35% non cars i.e cycles and public transport was probably unrealistic and not achievable and could result in more private car movements.

The local Member for the Watling division stated that the applicant had not consulted the adjoining Borough Council which covered the parish of Radlett, Hertsmere Borough Council about the planning application nor the accompanying Environmental Assessment.

The Committee expressed its concerns about the additional traffic movements on Hertfordshire roads which was likely to lead to greater congestion on surrounding roads, especially as there would be no direct link to the nearby M25. There was also concern about the railway linkage to the proposed interchange which would involve travelling along the 'slow' up and 'down' lines and using a crossing line with the operations being during the day and night but primarily during the day.

In response to a question, the Head of Transportation Planning & Policy stated the amount of parking provided as part of the development would be determined by the parking standards operated by St Albans District Council which in particular would need to take account of the peak demand experienced during shift workers change over times around 2 pm.

## **RESOLVED**

That, based on the information which has been received by the County Council to date and subject to the completion of the remaining works on the Traffic Assessment report and other consultations and for the reasons set out in the report, the Director of Environment be requested to advise St Albans City & District Council that the County Council's response is as follows :-

That the planning application should be refused because:

- a) The application has been submitted in advance of a region wide study of potential Strategic Rail Freight Interchange locations. It would be premature to permit the development in advance of the findings of the EERA commissioned Regional Freight Strategy and a wider greater south east study by the Regional Planning Bodies (in line with Department for Transport guidance)

- b) The applicant's Alternative Site Assessment is inadequate in being limited to a small sector of the east and south east regions and producing results which appear contradictory.
- c) A Strategic Rail Freight Interchange site to the north of London, such as Radlett, is not well placed to meet the forecast arisings of demand and is unlikely to achieve the benefits intended from increasing rail freight at the expense of road freight.
- d) The 'very special circumstances' that are required to warrant permitting this development in the Green Belt have not been demonstrated and the application should therefore be refused.
- e) According to the applicant's Traffic Assessment, a fully operational Strategic Rail Freight Interchange will increase traffic on the A414 by over 10%. As the A414 is already near capacity, the County Council is particularly concerned with the following aspects : -
  - 1) The safety and congestion aspects of the location and design of the new roundabout on the A414. The proposed roundabout is not large enough to provide sufficient capacity for queuing traffic creating unacceptable safety issues.
  - 2) The increase in traffic on this section of the A414 will be significant and the *ability of the proposed traffic lights at the Park Street and London Colney roundabouts to handle the extra traffic is questioned.*
  - 3) The amount of traffic to be generated may have been under estimated. There is no guarantee that the Strategic Rail Freight Interchange will operate as currently envisaged. The proportion of road based freight operations may increase beyond that anticipated increasing the level of HGV traffic generation.
  - 4) The impact, beneficial and adverse, of changing flows on the A5183. The environmental benefits and dis benefits of the Park Street Bypass are inadequately assessed.
- f) The application site is poorly located to attract the necessary staff and achieve the potential economic spin-off benefits from a Strategic Rail Freight Interchange contrary to the expectations of Strategic Rail Freight Interchange locational policy. It will not be of benefit to the Hertfordshire economy and a location in a Regeneration Area would be preferable.
- g) The target non car mode share for journeys to work of 35% is considered unachievable on the evidence presented given the widespread residential location of the labour force and the lack of detail on improvements to public transport services to the vicinity of the site.

- h) The proposals for country park and landscape and ecological improvements intended to mitigate for the losses associated with the development are unacceptable in scale, outcome and detail and the process and funding of a long-term management regime is not determined. No permission should be granted until these matters are satisfactorily addressed.**
- i) The proposed measures to mitigate the landscape impact of the development are not sufficient to compensate for the loss of this greenfield site.**
- j) The loss of this area of Green Belt is unacceptable because of the impact this would have on the Green Belt area south of St Albans as a whole.**

**A L Laycock  
County Secretary**