



Square One, 4 Travis Street,  
Manchester, M1 2NY  
T: 0161 880 3597  
E: [jill.stephenson@networkrail.co.uk](mailto:jill.stephenson@networkrail.co.uk)

Louise St John Howe  
Programme Officer,  
PO Services,  
PO Box 10965,  
Sudbury,  
Suffolk  
CO10 3BF

11 December 2019

Dear Ms St John Howe

## **St Albans City & District Local Plan 2020-2036: Publication Draft 2018**

### **Hearing Position Statement by Network Rail Infrastructure Ltd**

#### **Strategic Policy S6 xi: Park Street Garden Village**

Network Rail wishes to expand on our original representations raising two important matters for consideration relating to the proposed Strategic Site Allocation at Park Street Garden Village. These matters concern a) the impact of the allocation on the rail network, and b) the conflict between the proposed site allocation and the consented Strategic Rail Freight Interchange (SRFI). These considerations are set out in turn below.

#### **Impact on the Rail Network**

The proposed allocation of the Park Street Garden Village comprises 2300 new homes with associated community facilities, supported by a new park and ride facility on the Abbey Branch Line with a “step change” in the rail timetable to a 15-20 minute peak service. There is also a proposal for a possible additional station on the main line railway.

The Abbey Branch line would require thorough capacity analysis and appraisal work to consider the service provision capabilities, and to appraise the infrastructure enhancements required to support any increase in train movements. The policy as currently worded correctly identifies the need for a passing loop to be developed on the Abbey Branch line.

Additionally, there are currently 3 level crossings in situ on the Abbey Branch line that would form part of the analysis work.

The crossings have been assessed using the rail industry’s recognised ALCRM risk assessment tool. If service patterns double as proposed to support the proposed site allocation, these ALCRM ratings will change, as highlighted in the table below.

Crossing Name	Current FWI	Future FWI	Increase in Risk	Current Position in Ranking	Future Position
Cotton Mill Lane	0.03125 8779	0.061698475	97 %	4 <sup>th</sup>	1 <sup>st</sup>
Hyde Lane	0.00216 904733	0.004281258	97 %	109 <sup>th</sup>	68 <sup>th</sup>
Watford North	0.03024 33999	0.059894692	98 %	5 <sup>th</sup>	2 <sup>nd</sup>

An increase in risk as set out in the table would be unacceptable to Network Rail, and therefore the Policy must be amended to include reference to the need for the closure of the railway crossings, and for any necessary diversions to be funded and delivered as part of the development of the Garden Village.

Capacity and capability analysis would also be required to ascertain the suitability of any additional stations on the main line railway.

### **Conflict between the Proposed Garden Village and the consented SRFI**

Network Rail recognises that there is a need to achieve the right planning balance between the pressures of providing adequate rail freight infrastructure through the delivering the already consented SRFI, and achieving sufficient new homes in the plan area. In this respect it should be noted that Network Rail supports both the SRFI and housing development objectives in principle. Unfortunately, however, in this instance the Local Plan places both objectives in conflict.

SRFI developments are key to the realisation of Government objectives for carbon reduction in the transport sector through freight mode shift from road to rail. This is a particular issue for deep sea and domestic intermodal flows which are the biggest forecast UK rail freight growth sectors. Three key infrastructure elements need to be delivered, however, for this mode shift objective to be realised. These are:

1. Additional port rail capacity, particularly at the major deep-sea intermodal ports of Felixstowe, London Gateway and Southampton. This additional capacity has been progressively delivered since 2005.
2. Improved network capability (typically gauge, capacity and train lengths). This is being delivered by the DfT and Network Rail under the Strategic Freight Network programme which commenced in 2007 and continues to be supported by the DfT.
3. Inland terminal capacity particularly in the major regional centres of London & the South East, the Midlands, the North West, North East and Central Scotland. The needs in this area have been consistently recognised in Government policy since 2004. Delivering this capacity however typically falls to private sector developers and has proved to be the most challenging element to close out.

The merits of providing the SRFI at Radlett have already been proven through the granting of outline planning permission in 2014. Delivery of the SRFI at Radlett represents a significant step to meeting that need. Therefore, the consequences of re-allocating the site in question for the Garden Village proposal and foregoing the SRFI, need to be very carefully considered for the following reasons:

- A failure to support Government freight mode shift objectives.

- A failure to deliver SRFI capacity and freight mode shift benefits in the key London and the South East region.
- The risk of significant loss of confidence in the SRFI developer community with attendant risks to wider SRFI capacity development within the UK. Were this risk to materialise it has the potential to significantly impact on the ability to achieve intermodal mode shift objectives with socio economic and national productivity disbenefits to the UK.

When Network Rail was formed in 2002 it carried a primary mandate to operate, maintain and renew the UK rail network. Although not funded to promote network enhancements in its own right, it carries a Licence Condition obligation to facilitate network enhancements that are funded by third parties where these align with Network Rail and the DfT's wider strategic objectives for the network. The proposed SRFI at Radlett aligns with these objectives.

Specifically, Government policy set out in the National Policy Statement for National Networks (2014) states that there is a key need for SRFI facilities to serve the key London and the South East economic region:

***2.56** The Government has concluded that there is a compelling need for an expanded network of SRFIs. It is important that SRFIs are located near the business markets they will serve – major urban centres, or groups of centres – and are linked to key supply chain routes. Given the locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited, which will restrict the scope for developers to identify viable alternative sites.*

***2.57** Existing operational SRFIs and other intermodal RFIs are situated predominantly in the Midlands and the North. Conversely, in London and the South East, away from the deep-sea ports, most intermodal RFI and rail-connected warehousing is on a small scale and/or poorly located in relation to the main urban areas.*

***2.58** This means that SRFI capacity needs to be provided at a wide range of locations, to provide the flexibility needed to match the changing demands of the market, possibly with traffic moving from existing RFI to new larger facilities. There is a particular challenge in expanding rail freight interchanges serving London and the South East.*

Network Rail has therefore worked with the promoter on early stage development of the SRFI. All development work undertaken to date has confirmed the viability of the SRFI proposal from a rail technical perspective. Network Rail also carries a Licence Condition obligation to continue to support the SRFI promoter as a Dependant Person so long as the SRFI proposal remains viable from a rail context.

On this basis therefore Network Rail remain committed to supporting further development of the SRFI to the promoter's timescales.

We trust that the information contained within this letter will allow the Inspector to fully consider all aspects of the need for the SRFI facility balanced against the need for new homes, and the context of the spatial strategy proposed.

Network Rail has already confirmed that representatives wish to attend specific Hearing Sessions.

Yours sincerely

**Jill Stephenson**  
Town Planning Manager NWC  
Network Rail