

STRiFE9/08

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

Proof of Evidence by Alan Wilkinson on behalf of
Napsbury Lane Residents Association

A LOCAL PERSPECTIVE

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1. INTRODUCTION

My name is Alan Wilkinson. I live in Napsbury Lane. I am Chairman of the Napsbury Lane Residents Association and my occupation is Project Manager.

The Napsbury Lane Residents Association (NLRA) represents the residents of Napsbury Lane and Green Lane Cottages, St Albans. The Lane comprises 25 houses between the North Orbital Trading Estate and where it joins the eastbound A414. Numbers 45 and 71 face the A414, with the front doors on average 40m from the carriageway. Green Lane Cottages are 2 cottages overlooking the Midland Main Line railway. At its closest Napsbury Lane is about 500m from the proposed development site.

NLRA believe the appellant's proposal will have a severe impact on the quality of life of the residents of Napsbury Lane.

2. ALTERNATIVE SITE ASSESSMENT (RAIL)

2.1. The NLRA believes that the new Alternative Site Assessment provided by the appellant in their latest planning application still does not show Radlett to be superior to other sites considered and consequently the application fails to demonstrate the very special circumstances tests that justify development of the Green Belt.

2.2. NLRA have examined the appellant's Alternative Site Assessment and comment as follows:

2.3. The proposed redevelopment of the Brent Cross / Cricklewood area includes for rail freight facilities. This site was excluded on grounds of size. Although it is a smaller development without large warehousing, this development will have an effect on the Radlett site for 2 reasons:

2.3.1. It uses the Midland Main Line, and therefore will use a number of the freight routes available on this line. This obviously reduces the number of routes available for Radlett.

2.3.2. The site sits within North Circular Road, and as such will be a better place to unload freight for a large part of the market sector that Radlett is intended to serve.

2.4. The availability of freight routes is a contentious issue with this application. By eliminating the Brent Cross / Cricklewood option at an early stage, NLRA believe the

appellant have ignored the potential impact this site could have on a terminals at Radlett.

3. ALTERNATIVE SITE ASSESSMENT (ROAD)

3.1. Paragraph 7.19 of the Consideration of Alternative Sites states:

“As a general principle roads are considered unsuitable if there is a length of residential development or mixed uses, such as shops and schools, with direct frontage to the road.....It is not considered appropriate to generate around 3,200 HGV movements along roads where multiple road features would result in safety concerns”

3.2. Residential dwellings 45 to 71 Napsbury Lane face the A414, and are only stopped from having direct frontage by a six metre wide strip of deciduous trees and vegetation between the lane and the A414.

3.3. Ayletts Nursery, the Sopwell House staff hostel, Pet Partners Supermarket, Maidenhead Aquatics and Millers Sheds all front onto the A414 and have direct access. In terms of road safety, the junction of Napsbury Lane onto the A414, and the entrance to Ayletts Nursery are of particular concern to NLRA.

3.4. Transport Assessment Table 7.6 Distribution of HGV Trips, shows that 43% of all the site generated HGV trips will be along the eastbound A414. It appears that the principle stated in para 7.19 of the Consideration of Alternative Sites (quoted 3.1 above) has been ignored.

3.5. In respect of Accessibility to Work Force, the cost of travel has not been taken into account. Whilst the Midland Main Line into St Albans does provide a good service into the area for a north London or Luton workforce, there is no acknowledgement of the high cost of travel on this line. It is felt this would constitute a too high percentage of earnings to make the use of the MML to get to the site attractive to workers. Hence the proposed figures of car usage are seen as unrealistically low.

3.5.1. Included in the Sustainability Statement is reference to *“a ‘package of improvements to Park Street Station..... which will encourage greater use..... including for those of Impaired Mobility”* (Sustainability Statement, para 3.10).

NLRA do not believe improvements to a single station will benefit those of impaired mobility. Any true benefit would only be provided if the similar improvements were undertaken at all stations on the St Albans Abbey – Watford Junction branch line. Without such improvements then those of impaired mobility would be unable to travel to Park Street or alight at destinations from Park Street.

4. ALTERNATIVE SITE ASSESSMENT (Criteria NOT Included)

4.1. NLRA consider that the following should have been included as assessment criteria

4.2. Availability of Utilities - Specifically, the Sundon site is situated adjacent to the Sundon National Grid 132kV Electricity Substation. Radlett would require either new supplies or to generate its own power.

4.3. Use of renewable energy sources - in section 5 of the Sustainability Statement, the appellant seeks to explain why they will not be using renewable energy (the only costing in any of the technical reports is the financial justification for not having a green roof). Whereas, elsewhere in the application, much is made of the HGV related savings, the site itself is not 'green'.

4.4. In respect of Availability of Workforce, Table 4.2 in the Transport Assessment shows that of the estimated 3,385 jobs created with the vast majority (2,729) being either warehouse or driving jobs. Table 7.7 states that of the total 3,385 jobs, 527 will be taken by St Albans residents. It is recognised by the appellant that St Albans is an area of low unemployment. However they do not appear to fully accept that, due to the cost of housing, St Albans is unlikely to provide the number of local employees projected. NLRA supports this assertion with the following facts concerning local employment:

4.4.1. Sopwell House Hotel provides staff accommodation by means of a hostel on the A414

4.4.2. Ayletts Nursery has planning permission to build a staff hostel next to the nursery (SADC Planning application 5/2009/0159)

4.5. Availability of Site - two other sites that are seen by many as being superior alternatives, Colnbrook and Sundon, are the preferred sites for other developers who already own the land in question or have agreements to purchase. Clearly these locations would not have been available to the appellant so they sought to develop Radlett despite not being in ownership of the land and aware that the current owner is opposed to their plans.

5. TECHNICAL REPORTS - General

- 5.1. Reports in the press record that the appellants were claiming that it was unnecessary for the Inquiry to consider the entire planning application on the basis that the previous appeal only failed on the Alternative Sites Assessment. NLRA believe the whole application must be considered for the following reasons:
- 5.2. All the Technical Reports are dated March 2009,
- 5.3. Paragraph 1.6 of the Sustainability Statement reads *"The new application....reflects any changes to the previous scheme which were made between the 2006 submission and the close of the Inquiry"*. NLRA contends that the scheme as described by the application has never before been considered as a whole.
- 5.4. Technical Report 1 - Background Context para 4.4.4 quotes a report published in December 2008

6. TECHNICAL REPORTS - TRANSPORT ASSESSMENT

- 6.1. NLRA accepts that much has been said about the perceived traffic problems. However we find some of the data provided in the Transport Assessment to either lack robustness or to appear deliberately misleading.
- 6.2. The A414 between the Park Street Roundabout and the London Colney Roundabout is, as has been pointed out by many people, a highly utilised stretch of dual carriageway and highly susceptible to any disruption on the local road network. As an example, a closure on the M25 on Friday 18th September 2009 resulted in traffic travelling along the A414 at walking pace for over 4 hours. The traffic flow data makes light of these situations, and regards them as unusual. They are depressingly regular
- 6.3. During such incidents, the section of Napsbury Lane leading into St Albans becomes a rat-run, choked with traffic that typically tails back to the North Orbital Trading Estate which is the last opportunity drivers have to turn round and hence why it tails back no further. At such times, the residents of Napsbury Lane become prisoners in their own homes.
- 6.4. Tables 3.5 and 3.6 Turning Flows at Curo Park / Ventura Park

The Traffic Flow data ignores the development at Radlett 400/500, which is a development to the south of Ventura Park. At Radlett 400, units 2 and 3 (of 4 units

total) have recently been granted planning permission to change from Class B1/B2 usage to Class B8 (SADC 5/2009/0863).

Following these tables, para 3.3.4 states *“As a result of this review it can be seen that the use of the 2004 surveyed data is still acceptable”*. NLRA believe this statement should be justified in light of an entirely separate development being excluded.

6.5. Table 4.3 Arrival/Departure Patterns.

Appendix C explains that before shift change 793 cars will enter the site, and after shift change 793 will leave. The appellant has correctly identified that there is a requirement for 2 parking spaces for every car-using shift worker, but what has not been addressed is how to physically shift that volume of traffic through the single site entrance in that time, especially as there ought to be some form of security checking cars onto site. A simple analysis suggests that the vehicle at the back of the queue will take over an hour to get out the site. Likewise, there is huge concern that cars entering the site will tail back onto the A414 causing further disruption. The NLRA believes that as currently proposed the site would not operate as described..

6.6. Table 7.5 Total Traffic Generation

This table would appear to show that in any given 24 hour period, 13 more HGVs leave the site than enter it (1592 in, 1605 out). This requires explanation.

6.7. Table 8.6 London Colney Roundabout Flows

Paragraph 8.5.2 reads (referring to the table) *“It can be seen that the increase in overall flow through the London Colney Roundabout during the peak hours in 2011 is 4%. This does not represent a material increase in the total flow through the junction as a result of the development proposals”*

The NLRA has identified two issues with table 8.6 and the above statement

Firstly, the table does not show “Saturation Flow %” (Tables 8.3, 8.4, 8.5) or “% of Capacity” (Table 8.6). This appears to be a deliberate omission. With the known problems of the A414 eastbound towards this roundabout these figures are likely to prove that the roundabout cannot handle the additional traffic.

Secondly, the table gives projected traffic volumes in 2011. It is now 2009. Even if the development goes ahead there will be no work done on the site by that time. NLRA therefore questions the appropriateness of these figures.

- 6.8. In discussing the start up of freight services, Technical Report 4 Railway Operations and Infrastructure (Para 2.3.7) states "*Experience of DIRFT suggests that such levels [of rail freight] would not be expected for at least the first 10-15 years following opening, with DIRFT now operating (February 2009) at around 12 trains in and out of the site after 12 years of operation*". It must be assumed that HGV activity will increase in line with this, and that the full impact of the proposed development on local roads will not be felt until at least 2021.

NLRA believes that until traffic projections for 2021 and 2025 are provided, and not 2011 and 2016 as provided, a major deficiency exists in the proposal and that consequently the appeal should be dismissed.

- 6.9. Road Only Distribution (Para 7.2.5)

This paragraph states "*In addition to the rail related distribution activities, a proportion of the warehousing units will be used for road only distribution*". However, para 7.2.11 states (referring to table 7.5) "*It can be seen that, of the total daily traffic movements generated by the proposals, 36% arises from the rail based distribution, with 64% arising from road based distribution*"

Concern is constantly being expressed that the proposal is a thinly disguised road hub. These statements do nothing to dispel that fear, and the implication is that the development is 3 times the size it need be if it was solely a rail to road interchange.

- 6.10. Locational Advantages. Road Safety

Technical Report 5 - Locational Advantages, para 3.2.3 states that "*The Park Street Roundabout currently experiences more than two times the number of accidents which occur at the London Colney Roundabout*". However, Table 4 details the accidents at these Roundabouts and shows the Park Street Roundabout having 40 accidents in the given period compared the London Colney's 23. This is not more than two times. It is just over 1.7 time and therefore the statement appears deliberately misleading.

The report fails to assign any accidents to the proposed new roundabout on the A414. This is totally overlooked. The evidence from table 4 however suggests that an accident rate similar to that of the other two roundabouts is not unreasonable, i.e. 23 over the given period. With this assumption the overall accident rate for this stretch of dual carriageway will increase.

7. SUSTAINABILITY STATEMENT

- 7.1. Paragraph 5.2.2 uses Tables 1 & 2 to demonstrate that by use of the design methodologies described in the previous section of the document, CO₂ savings of 54% can be achieved. NLRA will dispute this statement.
- 7.2. Paragraphs 5.14 to 5.19 describe various methods of using renewable energy yet then dismisses them all.
- 7.3. Paragraph 5.20 states that the energy (CO₂) savings will be made by insulating the buildings and switching off lights.
- 7.4. Table 1 provides Baseline emissions data prior to applying energy efficiency measures. However, it does not show what this baseline is. It is therefore to be assumed that it is current design codes and standards, which are already quite stringent on energy efficiency.
- 7.5. Table 2 gives Baseline emissions data after applying energy efficiency measures, and shows a total 54% saving. However
 - The reduction in the warehouses is 667kg CO₂/year, a 0.03% saving
 - The reduction in the chilled warehouses is 4062567kg CO₂/year, a 73.8% saving
 - The reduction in the Offices is nil (which implies no saving is possible over current standards).
 - The reduction in the Vehicle Maintenance Units is nil
 - The reduction in the external lighting is nil
- 7.6. NLRA would challenge that a 73.8% saving is possible over current standards unless a 'green' power source such as wind power is used. Yet, as this was discounted in para 5.19, the claim should be justified.
- 7.7. Paragraph 5.24, bullet point 4 states that "*Local supplies and suppliers within a 50 mile radius will be preferred where economically viable*". This development will use a lot of concrete and steel. Whilst these can probably be obtained from a *supplier* within a 50 mile radius, neither of these products is *manufactured* within a 50 mile radius. As such, the 'green' credentials of this claim are meaningless, and it is felt that most similar claims made in the proposal do not stand up to similar scrutiny.

- 7.8. Great effort has been put into justifying not having a 'green' roof, and it is noted that this is the only costing provided in all the Technical Reports.
- 7.9. NLRA believe the appellant has given insufficient consideration to 'green' issues especially where financial investment is required. Despite a huge roof area, solar hot water heating (5.17) and photovoltaics (5.18) are both dismissed. The proposed design does not meet current expectations with regard to the environment. Should this appeal be allowed, then stringent conditions should be applied to ensure that a green agenda is followed.

8. OTHER CONCERNS OF NAPSURY LANE RESIDENTS

- 8.1. There is concern that the development will suppress house prices in the area, a fact confirmed by local Estate Agents. Obviously no exact figure can be put on this, but there is feeling of the appellant will profit whilst our own investments (our homes) see their value reduced. There appears to be no recognition of this in the appellants proposal, apart from acknowledging this as an issue raised at the Public Information Exhibition (see Statement of Community Involvement)
- 8.2. Napsbury Lane suffers from constant noise from the A414, and the curve in the A414 between the lane and the London Colney Roundabout means that noise easily enters the back gardens. Whilst we accept the constant drone as being part of living there, it is during the night that individual vehicles passing at speed can cause severe disturbance. The site is proposed to be 24 hour working. The additional noise that will be generated in quiet periods is of grave concern.
- 8.3. NLRA believe that growth in passenger services will absorb any spare capacity that may exist such that the required freight paths will not be available when required. The worry is that the site will become a road hub, with it being the Train Operating Company's fault.
- 8.4. There is widespread disbelief at the appellants proposal for a Countryside Park next to the M25. It does not really qualify as peaceful countryside. An area of reclaimed land has been opened, by LaFarge, in Harper Lane directly opposite the proposed park. This has a very low take up, and makes the proposal in the Helioslough submission somewhat superfluous