

BY POST AND EMAIL

Mr Chris Howsham
Department for Communities and Local Government
Zone 1/H1
Eland House
Bressenden Place
LONDON
SW1E 5DU

16347/A3/SF/ne

23rd December 2011

Dear Mr Howsham

**APP/B1930/A/09/2109433: LAND IN AND AROUND FORMER AERODROME, NORTH
ORBITAL ROAD, UPPER COLNE VALLEY, HERTFORDSHIRE
APPEAL BY HELIOSLOUGH LTD
APPLICATION REF 5/09/07/08**

Further to your letter of 29th November 2011 in connection with the above planning appeal, we are pleased to provide additional representations, on behalf of our client, Goodman Logistics Development (UK) Ltd ('Goodman'). These comments for obvious reasons do not repeat any representations previously made by Goodman in relation to this appeal.

1. Strategic Rail Freight Interchange Policy Guidance, Written Ministerial Statement and Logistics Growth Review

In broad terms, we consider the three recently published documents serve to strengthen the support for new SRFI development in order to serve London and the South East, to which the Secretary of State has previously applied considerable weight. In particular, the Strategic Rail Freight Interchange Policy Guidance emphasises a need "significantly to increase" the number of SFRI and in geographical terms recognises that locations are required "particularly but not exclusively serving London and the South East".

2. Network Rail Representations

We note Network Rail's advice that: *"There is an implication ...that Colnbrook and Radlett are competing Rail Freight Interchange schemes aimed at the same market. ...we are quite clear that this is not the case. ...there is no reason to suppose that these two developments could not both tap into this growing market successfully. ...multiple new RFI developments around a number of major urban centres are needed. ...each site has its own advantages ...there is unlikely to be such a thing as a "perfect" site solutionit is misleading to suggest that there is a choice between one site or the other."* This is not dissimilar to the position previously expressed by the Appellant (IR 7.197); informed by the King Sturge market assessment within the ASA that "the distribution warehouse markets around Colnbrook and Radlett are largely distinct, being characterised by different occupiers and different demand and supply dynamics".



3. Slough Borough Council Representations

The selective and misleading use of quotations fails to provide a complete picture of the routing of trains from the west towards Colnbrook. While the need case for SIFE and the subsequent traffic forecasts are not predicated on train movements from the west, train services from the west can be accommodated should the need arise, either requiring a reversing manoeuvre at Acton Yard or a direct (but slightly longer) route via Staines and the West London Line.

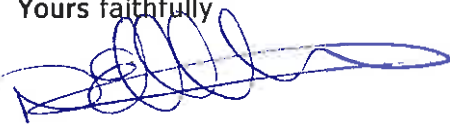
The implications of a reversing manoeuvre at Acton Yard for trains between Radlett and the WCML are discussed in the Appendix to this letter.

4. Appellant Representations

We rely on our letter dated 10th November 2011 and maintain the points made in it, in view of which and the recent policy documents (referred to at 1 above) together with Network Rail's advice (referred to at 2 above) we do not consider it appropriate to treat the redetermination of the Radlett appeal as if it were the appropriate forum for considering the merits of Goodman's forthcoming appeal. Instead we simply seek to correct some of the most striking errors for the record and so as to ensure that the Secretary of State is not misled by the Appellant's representations. On this basis, our response to specific numbered paragraphs within the Appellant's representations is set out in the enclosed Appendix.

We trust that that the above comments are of assistance in the determination of the appeal and please do let me know should you require any additional information at this stage.

Yours faithfully

PP 

SIMON FLISHER
Director

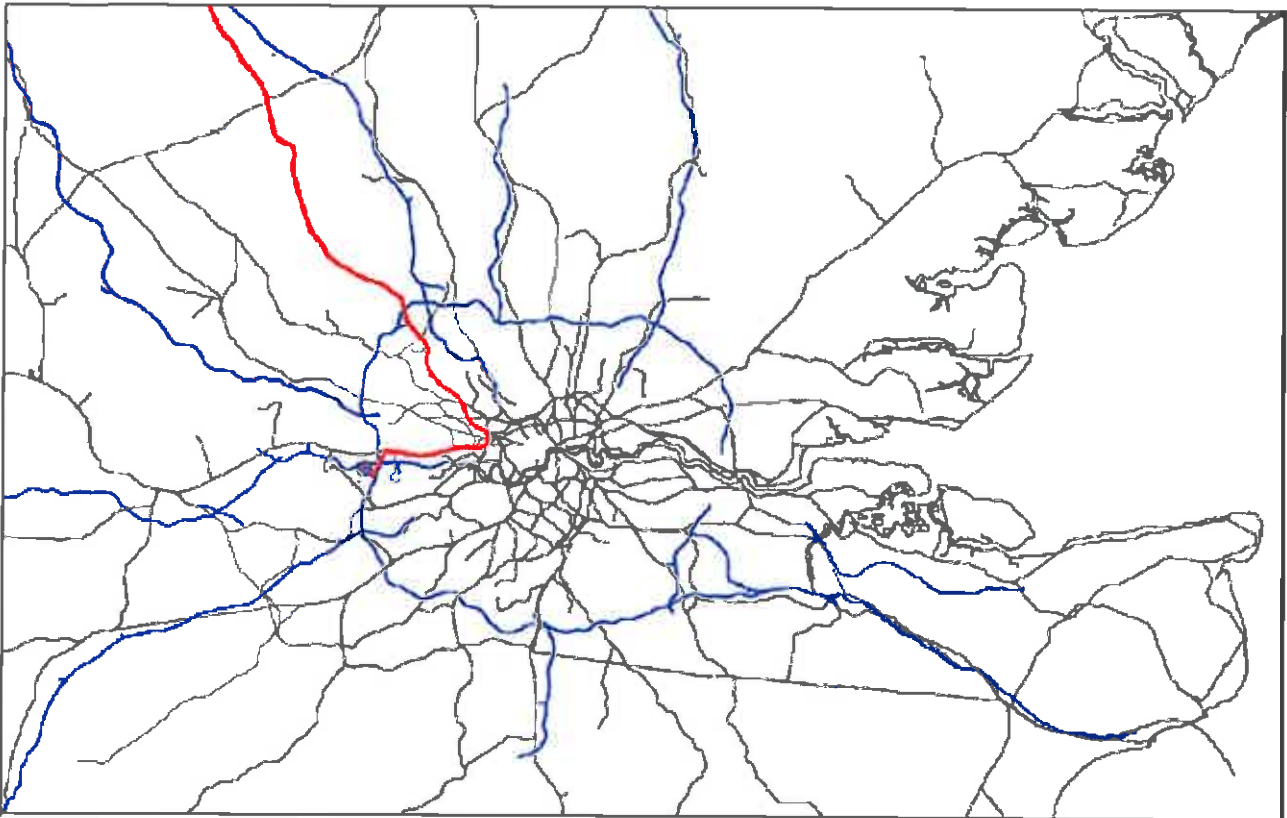
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Appendix

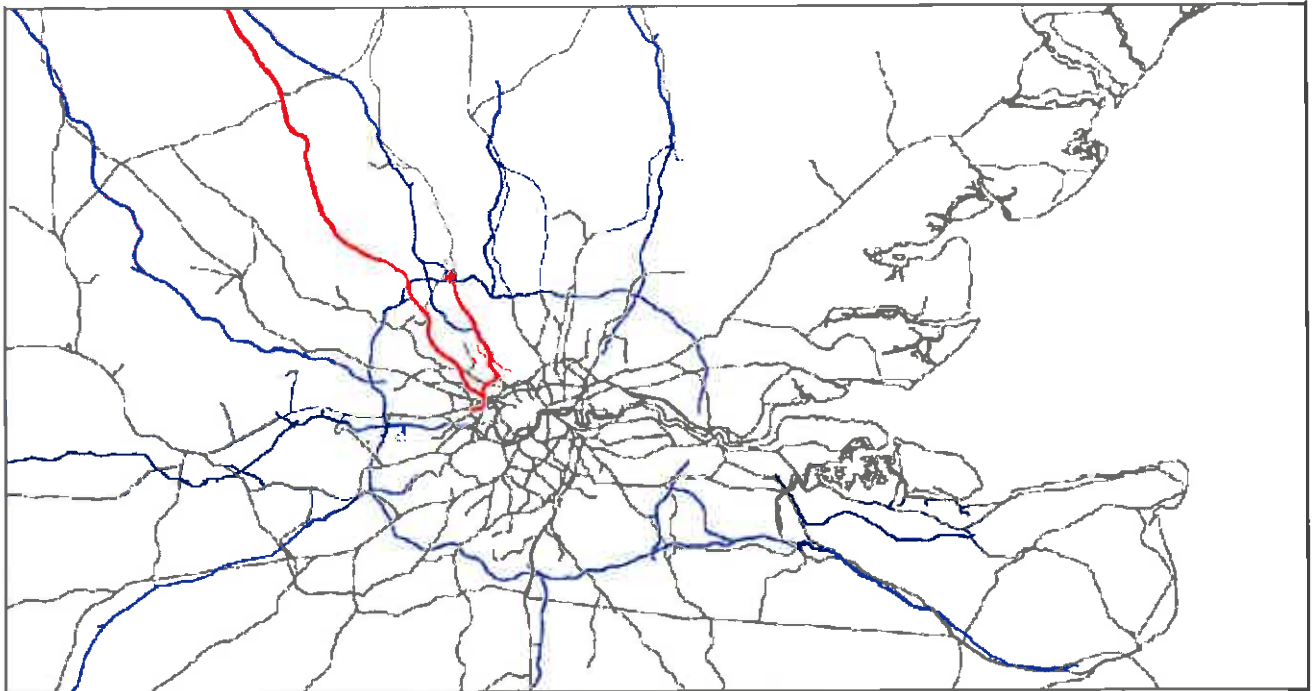
- Para 16 – The suggestion that the Secretary of State accepted the conclusions of the Appellant's ASA in 2010 is clearly incorrect (Decision Letter para 25). Furthermore, the inference that Radlett is better related to the highway network than Colnbrook is at odds with the Appellant's own application documentation (ASA para 8.20) and the Inspector's conclusions (IR para 13.103).
- Paras 35-36 – The GWML enhancements and their particular benefit to Colnbrook are detailed at Pages 99-100 of the IIP. It is acknowledged that Radlett could potentially benefit from these enhancements, but only if the route from Acton to Radlett via Crickwood was also upgraded at the same time. These additional upgrade works are not being promoted by Network Rail at this time (the IIP states that the gauge enhancement of the GWML will include the connection to the WCML, but not the MML). They are also beyond the scope of the proposed planning condition triggers until after 175,000sqm of floorspace is occupied (IR Page 199).
- Para 38 – In respect of the gauge clearance of the GWML, the Appellant fails to recognise that the Secretary of State for Transport confirmed in a statement to Parliament on 1st March 2011 that GWML electrification will proceed to Bristol, Cardiff and Oxford. In order to install the Overhead Electrification Equipment, overline clearances will need to be upgraded at a number of locations. This will, as a 'knock-on' effect, also enhance the loading gauge of the GWML beyond its current W8 designation. The upgraded GWML connects with the Southampton to Midlands via Oxford route at Reading, which has recently been enhanced to W10. The WCML and route to the Channel Tunnel are already cleared to W9/W10. On that basis all access routes to Colnbrook will be gauge cleared to the required standard when the development would be open for business. The gauge enhancement of the GWML is referenced on Network Rail's own website (extract enclosed). Should any further safeguards in connection with gauge enhancement be required through a S106 Agreement, that would be a matter to be addressed in the context of Goodman's own planning appeal.
- Appendix Para 4 – The assertion that Colnbrook has no advantage over Radlett in terms of connectivity to the WCML is not confirmed by the Inspector (para 13.102). Indeed, Colnbrook can be seen to demonstrate clear advantages over Radlett in terms of connectivity to the WCML, as follows:
 - Trains from Colnbrook benefit from a direct route to the WCML, whereas trains from Radlett would need to perform a reversing manoeuvre at Acton Yard;
 - The distance from Colnbrook to the WCML is broadly similar to that from Radlett, however the time taken for trains to route from Colnbrook to the WCML (45 minutes) is significantly less than from Radlett to the WCML (83 minutes), based on current average Working Timetable sectional running times;
 - The gauge between Colnbrook and the WCML will be to the required standard, whereas the enhancement works required to improve the route between Radlett and the reversing manoeuvre at Acton Yard are beyond the scope of the proposed planning condition triggers until after 175,000sqm of floorspace is occupied;
 - Plans summarising the routes between Colnbrook/Radlett and the WCML are enclosed.
- Appendix Para 10 – The Applicant fails to acknowledge that the Colnbrook Branch Line can already accommodate the full range of intermodal units on standard height platform wagons and therefore does not require gauge enhancement. Furthermore, Network Rail have

previously confirmed (letter enclosed) that the rail connections between Colnbrook and the UK rail network are technically feasible and will comply with relevant engineering standards.

WCML Rail Access Maps



	<i>Minutes</i>
From West Coast Main Line	
HARROW & WEALDSTONE	0
HEATHROW AIRPORT JN	31
WEST DRAYTON	35
ARRIVE SIFE	45
<i>Distance</i>	111km



From West Coast Main Line	Minutes
HARROW & WEALDSTONE	0
ACTON MAIN LINE	23
ACTON MAIN LINE	53
ACTON WELLS JN	56
DUDDING HILL JN	62
SILKSTREAM JUNCTION	74
ARRIVE RADLETT	83
<i>Distance</i>	<i>119km</i>

Network Rail website http://www.networkrail.co.uk/developing_rail_freight_in_control_period_5.aspx

Developing rail freight in CP5

We want to see more freight removed from road onto rail to provide a faster, greener, safer, and more efficient and reliable way of transporting goods.

We're already making major improvements to the rail freight network, but more needs to be done. The industry wants this network to develop further through funding these schemes in Control Period 5 (CP5), 2014-2019:

Falcons – Nuneaton phases 2

Increase capacity to up to 56 trains per day (tpd) in each direction by 2030

Works will include signalling remodelling and double tracking schemes

Will help remove 760,000 lorry journeys per year by 2030

Diversion of freight traffic from North London line and Great Eastern Main Line to decongest railways saving the capital

Southampton – West Coast Main Line capacity

Increase capacity to meet 2030 forecasts

Works required include signalling enhancements and line speed improvements

Use of the routes via Andover, New, Melksham and Oxford to Blisley to provide additional capacity and diversionary capability will also be explored

West Coast Main Line, north of Preston capacity

Increase capacity to 30tpd in each direction by 2019 and 40tpd by 2030

Extended freight loops will allow additional 775m freight trains

Improved interaction of freight services with higher speed passenger services to avoid potential delays

Great Western Main Line gauge widening works

Gauge enhancement from Ayles to Bristol and Cardiff to accommodate larger containers

Efficiencies gained from earlier enabling works by the Crossrail and CMLM electrification projects

Works include bridge reconstructions, track lowering and slowing, modifications to platforms and canopies

What happens next?

September 2011 – Initial Industry Plan published, setting out plans for rail between 2014 and 2019

Summer 2012 – Government decides whether or not to fund these freight schemes

Autumn 2013 – Office for Rail Regulation makes its final decision on whether to give these freight schemes the go ahead

We're continuing to make the case for these freight schemes and develop the smartest engineering solutions at the best possible price, in order to secure funding from government by the summer of 2012. We approach to any support you're able to offer.



Distance a tonne of goods can travel on a gallon of diesel

Contact us

Email FreightCP5@networkrail.co.uk or FreightCP5@networkrail.co.uk for more information on the proposed schemes.

Cleaner

Per tonne of cargo, rail freight produces 76% less carbon dioxide than road freight

This saves 1.8m tonnes of carbon in Britain every year – equivalent to that saved by more than 230,000 solar panels

Rail freight produces less than a 1/10 of the nitrogen oxides and fine particulates produced by road haulage per tonne carried

Cheaper

On average one freight train replaces 60 lorry journeys. Removing 10% of road freight would save British industry nearly £1bn per year
A gallon of fuel moves a tonne of goods 246 miles by rail but only 68 miles by road, on average
Road congestion costs the British economy up to £20bn every year

Safer

Lorries contribute to a disproportionate number of accidents per mile travelled; Department of Transport figures suggest that between 1999 and 2008 there were 117,000 incidents involving HGVs

Network Rail letter (28th October 2010)

Network Rail
3rd Floor
Bristol Temple Point
Bristol
BS1 6NL

Ask for : Barbara Morgan
Tel : 0117 3721118

My Ref : CP/TP10/0329/BM
Your Ref : P/14961/000

Date : 28th October 2010

Dear Mr Stimpson

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: (Outline Application) Construction of a rail/road freight Interchange comprising an intermodal terminal and Class B8 Distribution Units to include:

Infrastructure to enable the exchange of freight between road and rail, including railway sidings with a connection to the Colnbrook Branch Line and an intermodal terminal incorporating two overhead gantry cranes and external container storage etc.

SIFE, Land North of A4 Colnbrook by Pass, and West of Lakeside Road, Colnbrook By Pass, Slough, Berkshire SL3 0FE

Thank you for your letter received 18th October, together with the opportunity to comment on this proposal.

In relation to the above application I can confirm that Network Rail supports the principle of this application and below are the comments supplied by Network Rail's Route Director.

"It is the aim of Network Rail, in accordance with those of Central Government and the Department for Transport as set out in the White Paper 'Delivering a Sustainable Railway', 2007, to promote, encourage and accommodate the growth in the transportation of freight by rail since it is recognised (within the White Paper) the important contribution that freight services (by rail) makes to the Government's economic, social and environmental goals.

Network Rail's Freight Route Utilisation Strategy (March 2007) sets out a detailed analysis of freight issues, requirements and proposals for accommodating growth. The development schemes identified in this strategy, including this proposed Intermodal Freight Terminal, are considered to contribute to a Strategic Freight Network.

Network Rail are committed to working with independent parties such as Goodman to grow freight transport on our railway network. We have previously been involved in a series of discussions with Goodman regarding the S.I.F.E. proposals in order to understand their requirements as clients and to evaluate how this proposed freight terminal could fit on the U.K. railway network, in particular how it will operate in reference to the Colnbrook branch line and the Great Western Main Line (GWML) and how it will affect other future railway projects.

The S.I.F.E proposals fulfil a number of the criteria for a successful rail freight interchange to enable rail to supply new markets.

The proposals would have the opportunity to enhance the performance and capacity of the network and will likely result in the enhancement of the railway infrastructure. It will also be able to co-exist with other railway projects including Crossrail.

Upon the review of the development proposals to date, Network Rail are satisfied that the proposals developed for the rail connections between S.I.F.E. and the U.K. rail network are technically feasible and will comply with relevant engineering standards.

The proposed development would contribute towards sustainable economic development in accordance with PPS 1 – Delivering Sustainable Development. The proposals would deliver significant environmental benefits, including the reduction in the number of lorries on the road network, reduction in road congestion and the reduction in the emission of greenhouse gases of which would help to mitigate the effects of climate change; and social benefits, including the protection and enhancement of the vitality of the local economy, local employment opportunities and the overall enhancement of quality of life in Slough and other nearby settlements. In addition, the proposals would encourage a more sustainable pattern for the transportation of freight by rail, in accordance with PPG 13 – Transport.

Accordingly, Network Rail is, in principle, in support of the proposed development”.

Please feel free to get in contact if you have any questions.

Yours sincerely,

Barbara Morgan
Town Planning Technician (Western)