

**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 Ann Morton on behalf of  
Bricket Wood Residents Association**

**A LOCAL PERSPECTIVE**

## **1. Introduction**

My name is Ann Morton. I represent the Management Committee of Bricket Wood Residents' Association (BWRA). I have held a number of roles during my 21 years on the Committee and am presently leader of Planning. I have not had any "planning training", although over time I have generally gained a greater understanding of 'planning' than an average member of the public.

There are close to 1800 households in Bricket Wood, 85% of whom are members of the Residents' Association. A team of Road Stewards collect an annual £2 per household subscription and distribute the quarterly magazine we produce for our village. We hold quarterly open meetings for residents, where we often arrange a speaker or a social evening and the meetings provide the opportunity to discuss local matters, including this proposed Rail Freight Interchange.

This proof of evidence sets out issues and concerns which the Management Committee of BWRA believe are unique to our village and the surrounding area.

## 2. **M1 Motorway Junction 6**

- 2.1 The proposed development is intended to serve LONDON and the South East. The normal route to and from London using the M1 would be via Junction 6.
- 2.2 Junction 6 needs to be considered at this Public Inquiry because, in our view, the issue was not dealt with and therefore not resolved by the previous Inquiry. We have been unable to find any reference in the Inspector's Report to vehicles travelling routes via M1 Junction 6 despite it being an obvious southern route for London direction.
- 2.3 We believe the Transport Assessment is fundamentally flawed because it does not deal with Junction 6 of the M1 motorway. In the Transport Assessment, access to the M1 is shown to be at Junction 8 via the A414 (*formerly M10/ Junction 7*). The road layout at Junction 8 is, in practice, a route for traffic to and from the NORTH only. The M1 southbound cannot be directly accessed at Junction 8 and there is no logical reason why northbound traffic would drive past Junction 6 and not exit there for the Rail Freight Interchange.
- 2.4 There are two routes between the proposed development and M1 Junction 6. The prime route for all vehicles to and from the northern end of the proposed Park Street bypass is via the A414 and A405. An alternative route for all light goods vehicles, cars and motorbikes is from the southern end of the bypass and then via the local roads of Smug Oak Lane, Station Road and Mount Pleasant Lane, to the dual purpose residential road/southbound slip road of the M1 Junction 6.
- 2.5 There appears to have been no evaluation of M1 Junction 6 by the Appellant or the Highway Authorities suggesting that the impact of Rail Freight Interchange traffic using these routes is being ignored.
- 2.6 Junction 6 is a substandard junction with single carriageway and two way traffic where the southbound slip road between the A405 and the motorway unusually acts as combined slip road and residential road, with access for residential properties and two residential roads.
- 2.7 Junction 6 also operates as the M25-M1 motorway interchange as there is no direct southerly connection between these motorways.
- 2.8 The M25 is being widened to four lanes in both directions yet the Highways Agency have no plans to improve the M25-M1 interchange and such motorway traffic will continue to use the A405 as far as we are aware.
- 2.9 The A405 is already heavily congested, especially at peak hours as it approaches the notorious bottle neck of M1 Junction 6 south. The junction itself is totally unsuitable for the volume of traffic that currently uses it.
- 2.10 Whereas the Highways Agency and the Appellant seem likely to reach agreement concerning Junction 21A of the M25, BWRA would consider whether enough consideration has been given to traffic from the proposed development through the Junction 21A roundabout to and from the M1 south at J6. BWRA consider that this is an extremely important point that needs to be addressed.
- 2.11 The expected visitor numbers given by Butterfly World were initially 250,000 (planning application), but now vary widely up to 700,000 (Travel Plan) and over one million (presentation at BWRA Open Meeting). The extra traffic generated by Butterfly World will be additional pressure on the A405 and in particular the M25 Junction 21a /A405 /M1 Junction 6.

- 2.12 BWRA would wish to highlight that the first suggested route on Google maps from Park Street Roundabout to City of London, to Wembley or to Wood Green directs vehicles via A405, through Junction 21a and M1 at Junction 6.
- 2.13 Road signage on the A405 at Bricket Wood directs vehicles to turn left on to the southbound residential road and motorway slip road for Central London, Harrow, Watford, (M1) and Bricket Wood; it directs vehicles to carry straight on for North Watford but black background signs direct lorries to turn left for North Watford Industrial Estate.
- 2.14 The Need Case for a Strategic Rail Freight Interchange Technical Report 5 - Locational advantages does refer to M1 Junction 6:- Para 2.2.2 “The main HGV routes from the site would be ... To London via A414 west, A405 to join M1 at Junction 6” and Para 4.1.1 “The site is just 5 km from junction 6 of the M1 providing a route to the heart of the North West Sector of London.” Surprisingly, the Technical Report 5 then concludes that access to the M1 will be via M10 (now A414) i.e. Para 6.1 “..and the M10, which provides direct access to the M1.” and Para 6.2 “The site is ideally located in terms of the strategic highway network, being close to the M25 and the M10, which gives direct access to the M1.” There is NO mention of the A405 to M1 Junction 6 in the conclusion.

### 3.0 Local roads

- 3.1 The Highways Agency are expected to introduce demand management on motorways and there is also talk about road pricing on motorways – the consequences could be significant on local roads if vehicles are prevented or discouraged from entering the motorway.
- 3.2 The Inspector’s Report of the first Inquiry acknowledges the widespread concern amongst local residents that traffic generated by the development would worsen congestion on the principal roads serving it and that this would in turn increase traffic on local roads through residential areas. (IR16.81)
- 3.3 Bricket Wood already suffers significant rat-running when main roads are congested and the whole area can be brought to a standstill when there are serious problems on either the M25 or the M1.
- 3.4 When Smug Oak Lane was raised by interested parties (including BWRA) at the previous Inquiry, in his cross examination the Inspector referred to access to local roads being restricted by the junction design at the southern end of the proposed bypass. In his report the Inspector only refers to local roads being used as rat runs at times of congestion but this does not show an understanding of Smug Oak Lane as an ‘alternative route’.
- 3.5 The local roads of Smug Oak Lane, Station Road and Mount Pleasant Lane provide an openly available, direct route for all Light Goods Vehicles, vans, cars, motorbikes to travel to and from the M1 Junction 6 and the A405 – 24 hours a day, 365 days of the year. Despite directing traffic to the A414 northern access, the Transport Assessment traffic flow diagrams show a third of the light vehicles will use the southern access and travel south towards Radlett but apparently NO traffic will use Smug Oak Lane. Given the convenience of the ‘alternative route’ to the M1 and availability of SATNAV, a significant proportion of drivers will use the local roads through Bricket Wood.
- 3.6 A414 to Junction 6 of the M1 at Bricket Wood. This had clearly been over-looked by the Appellant when their road witness, under cross examination, stated in response to this particular issue, that local people would have a better understanding of local road conditions. BWRA would question if any studies been done on the proposed southern access junction design. For example, if vehicles are prevented from travelling on the current A5183 through Park Street, some drivers may choose not to use the new A5183

Park Street relief road to the A414 but, may travel along Smug Oak Lane and then north via Park Street Lane and Tippendell Lane to the A405.

- 3.7 In addition, the proposed Park Street relief road benefit will actually disadvantage Bricket Wood because it will provide a NEW, more direct, route between the A414 and the M1 Junction 6 and A405, further increasing traffic on local roads. As highlighted at the first Inquiry, the proposed relief road connects with Smug Oak Lane, Station Road and then Mount Pleasant Lane to provide an alternative route from the congested A414 and A405. Drivers who know the area may travel along Smug Oak Lane and through the centre of the Bricket Wood to access the A405 via Oakwood Road.
- 3.8 The Inspector agreed that significant rat-running occurs (IR16.81) yet then went on to conclude that the situation would not worsen because of the development and in doing so clearly ignored the rat-running opportunity afforded by the proposed Park Street bypass as described in the previous paragraph. The reasoning for the Inspector's conclusion was that rat-running is a response by drivers to congestion and that this would not increase as a result of the development. This is based on evidence that with the proposed improvements to the Park Street and London Colney roundabouts, congestion would be no worse with the development than without (IR16.81).
- 3.9 Significantly, the Inspector stopped short of stating that congestion will be any better. Consequently, it can be concluded that congestion will still affect the A414 and A405 and that rat-running will still represent an attractive alternative for drivers. The proposed relief road will contribute to this harm in the manner described to the detriment of local communities. This undermines the conclusion that rat-running would not worsen because of the development (IR16.81).
- 3.10 To support the statement that Smug Oak Lane is an 'alternative route' and not just a rat-run at times of congestion, some members of the Management Committee (BWRA) have carried out a "snapshot" of traffic movement with vehicle counts on Smug Oak Lane and Mount Pleasant Lane to illustrate the use of these local roads. Ideally an 'origin and destination' survey would be more helpful to inform where drivers are coming from and going to but we are not in a position to do this. As far as we are aware there were no exceptional traffic incidents at the time of counting. The results of our traffic count are shown in Appendix 1.
- 3.11 The "snapshot" shows the expected increased peak hour traffic flowing south in the morning and north in the evening but there appears to be a consistent flow of vehicles in both directions at all times.
- 3.12 80% of Smug Oak Lane traffic travels to and from the south. So, if NO Rail Freight Interchange vehicles will use Smug Oak Lane why are so many vehicles in the "snapshot" currently travelling north from Radlett/Harper Lane turning into Smug Oak Lane even in the morning when it is against the usual peak morning southerly flow of traffic? There are too many vehicles for it to be just Bricket Wood local traffic; A5183 traffic to St Albans and M1 north will logically travel on the A5183 through Park Street. The numbers of vehicles using Smug Oak Lane and Mount Pleasant Lane suggest they may be using the 'alternative route' travelling to and from the M1 and A405.
- 3.13 Further evidence that drivers will currently use the route can be found by searching Google maps for directions from Colney Street (where the southern access will emerge on to the existing A5183). The first suggested route from Colney Street to City of London, to Wembley or to Wood Green gives the directions:- A5183, via Smug Oak Lane, Station Road, Mount Pleasant Lane, and then M1 Junction 6 south.
- 3.14 It is a reasonable assumption that a currently used route would also be used by Rail Freight Interchange traffic. Not only are some of the workforce likely to use the southern access on

to Smug Oak Lane, depending on where they live, but the route is also likely to be legitimately used by light goods vehicles, vans delivering goods to London and other southern destinations as well as service vehicles and visitors to the site – the developers do not know yet who will occupy the massive warehouses and other businesses on the site so there must be uncertainty about the numbers and makeup of vehicles it will generate.

- 3.15 The route may occasionally be used by SRFI HGV drivers because, despite the 7.5 ton weight restriction, currently some HGV drivers continue to travel through Bricket Wood, probably realising there is minimal risk of enforcement.
- 3.16 Bricket Wood residents will suffer environmental harm and deterioration in quality of life due to the significant increase in traffic generated by the development as well as additional through traffic taking advantage of the new relief road from the A414 to and from the M1 and A405. This extra traffic will cause noise, disturbance, nuisance, air pollution, and congestion at busy times. It will also be a safety hazard on our local roads - safety of children from the increased traffic passing the Primary School and Children's Centre on Mount Pleasant Lane is a particular concern. Bricket Wood is generally considered a pleasant and attractive place to live and the extra traffic will adversely affect the character and environment of our village tremendously.

#### **4.0 Green Belt**

- 4.1 Impact on openness of the Green Belt and loss of countryside is a significant issue.
- 4.2 It is a tremendous concern that the massive industrial complex and its associated activity will harm the environment and open countryside surroundings as well as the setting of the historic city of St Albans. This land totally achieves the objectives and purposes of the Green Belt without which it would long ago have become part of a north London conurbation.
- 4.3 Bricket Wood residents will suffer from the loss this countryside and green land that makes a positive contribution to the appearance and attractive character of the area. We enjoy using the extensive network of footpaths and bridleways in the countryside south of St Albans. We consider the proposed Country Park to be of limited benefit because of its piecemeal nature and proximity to the noise, pollution and disturbance of the development.