

TRANSPORT AND WORKS ACT 1992

TRANSPORT AND WORKS (INQUIRIES PROCEDURE) RULES 2004

THE NETWORK RAIL (OLD OAK COMMON GREAT WESTERN MAINLINE TRACK ACCESS) ORDER

PROOF OF EVIDENCE – HIGHWAYS

STATEMENT OF JEREMY DOUCH

16 OCTOBER 2023

1. INTRODUCTION

- 1.1 My name is Jeremy Douch and I am employed by AECOM Ltd as a Regional Director. I am responsible for the Development Transport Planning team in the UK and Ireland which comprises approximately 80 staff.
- 1.2 AECOM Ltd is one of the largest engineering and environmental consultancies in the world employing over 50,000 staff and has a number of offices in the UK. Within our Development Transport Planning team, we provide advice to a range of private and public sector clients within a number of end markets.
- 1.3 AECOM has supported Network Rail on a number of schemes across the UK over many years. In addition, the South Rail Systems Alliance was formed in 2019 between AECOM, Network Rail and Colas. It is one of three alliances appointed by Network Rail, covering a 10-year framework to help deliver track and rail system renewals specifically in the south of the UK.
- 1.4 I hold a Bachelor of Arts Honours degree in Planning Studies and a Postgraduate Diploma in Planning specialising in Transport Planning. Both qualifications were obtained from Oxford Brookes University. For the past 20 years I have been a Chartered Member of the Institute of Logistics and Transport.
- 1.5 I have worked in the field of Transport Planning for around 30 years, within the private sector. I started my career at Jacobs, a large multi-disciplinary consultancy where I progressed from a Graduate to a Principal Consultant and Project Manager. I was then employed with the (as was) global Halcrow Group Limited as an Associate Transport Planner. Between 2007-2012 I was the south-west England Regional Manager of the medium sized independent consultancy Mayer Brown. I was appointed as the south-west England / south Wales head of Development Transport Planning at AECOM Ltd in 2013, where I have since progressed to the UK and Ireland lead (since 2021).
- 1.6 Whilst at AECOM Ltd I have also held the positions of Bristol Office Manager between 2014-2017 responsible for around 200 staff and have been an active member of the Bristol Chamber of Commerce Group and also the Bath Group.
- 1.7 I have provided technical transport planning advice to a range of private and public sector clients and have considerable experience in the residential, industrial, commercial, energy, defence, education and health sectors. I am also experienced in the rail sector which includes a secondment into the rail industry, and have also worked on a range of highway and active travel projects. I have presented a technical transport planning paper at a European-wide industry event and have undertaken formal lecturing at Universities and through the industry recognised PTRC training courses.

- 1.8 I have attended a number of Public Inquiries, Appeals and Hearings as both an expert witness and as technical support. I have prepared various formal evidence submissions.
- 1.9 I have attended the site which is the subject of this Inquiry (**the Site**), which is comprised of the 'Order Land' (being Plots 2-4 in the above-named Order) and also the land identified as Plot 1 for the purposes of the Order. I am familiar with the area in which the Site is located.

2. INVOLVEMENT WITH THE PROJECT AND STRUCTURE OF THIS STATEMENT

- 2.1 I am the transport lead on this project (**the Project**) and my involvement has been to provide advice regarding its impact on the local highway network, including responsibility for overseeing the preparation of the Transport Statement submitted to inform deemed planning application applied for pursuant to the Order.
- 2.2 The Project is described in detail in Mr Fleming's Proof of Evidence, as well as Network Rail's Statement of Case, but in summary consists of:
- a. Provision of a temporary Road-Rail Vehicle (**RRV**) access via a Road-Rail Access Point (**RRAP**) onto the Great Western Main Line (**GWML**) up to 2030, together with a temporary construction/access compound; and
 - b. Provision of a permanent RRV access onto the GWML railway to enable reliable future maintenance to the southern side of the main railway lines.
- 2.3 The first part of the Project is proposed to be undertaken at the Order Land, which is described in Mr Sinclair's Proof of Evidence, but which (as noted above) in summary consists of Plots 2, 3 and 4, as shown on the Land Plans submitted with Network Rail's application for the above order. The second part of the Project (i.e. the Permanent RRV) will be provided on Plot 1, served by an access route running over Plot 2.
- 2.4 My proof of evidence partly addresses the matters raised at paragraph 3 of the Secretary of State's Statement of Matters dated 15 September 2023 (**Statement of Matters**), namely: *"impact resulting from an increase in HGV movements including on the local highway network"*.

3. ORDER LAND EXISTING TRIP MOVEMENTS

- 3.1 As at the date of this proof of evidence, the Order Land is occupied by STARK Building Materials UK Limited (formerly Saint-Gobain Building Distribution Limited) trading as Jewson, who have been operating the Order Land as a builders' merchant for over 30 years (**Existing Use**).
- 3.2 The Site is bounded to the north by the GWML railway, to the east by residential and commercial properties and the A4000 Horn Lane, and to the southwest by other residential properties. Plot 1 (also known as the Crown Land, as described in detail in Mr Sinclair's Proof of Evidence), which adjoins the Order Land is currently not occupied, and comprises a vegetated area.
- 3.3 Vehicle access to the Order Land is from the A4000 Horn Lane via a T-junction. The A4000 Horn Lane connects Acton in the south with North Acton in the north. Adjacent to the Order Land, the A4000 Horn Lane is a single carriageway road varying in width between 7-10m, allowing for some on-street parallel parking in places, and with a 20mph speed limit. It is managed and maintained by the Local Highway Authority, the London Borough of Ealing (**LBE**). There are wide footways along the length of the A4000 Horn Lane, although there is no footway provision from Horn Lane to the Order Land.

- 3.4 The Order Land (and also Plot 1) abuts the GWML which runs between London Paddington and Bristol Temple Meads and can also provide access to the Old Oak Common (**OOC**) station located 1.2km to the east of the Site.
- 3.5 Road collision data for the section of Horn Lane in vicinity of the Site for the most recent five years' available (2017-2021) demonstrates a total of six collisions were recorded. One was classified as a serious collision with the remaining classified as slight. There were no fatal collisions that occurred in vicinity of the Site during this time period and no clusters of collisions were identified.
- 3.6 As described in Network Rail's Statement of Case, as well as Mr Fleming's Proof of Evidence, the Project is critical in terms of delivering HS2 and for future maintenance of Network Rail's assets. The Site provides at-grade access to the railway whereas other potential points along the route have height variations significantly compromising or removing the opportunity to connect with the railway (as explained in Mr Ford's Proof of Evidence).
- 3.7 The impact on vehicle movements generated by the Project in comparison to the Existing Use has been considered by AECOM Ltd, as summarised in their report *Temporary Road Rail Access Point – Transport Statement*, a copy of which is appended to this Proof of Evidence [JD1].
- 3.8 Manual Classified Counts were undertaken at the junction of Horn Lane and the Order Land access road on Wednesday 2 November 2022 between 07:00–10:00hrs to cover the weekday network morning peak period, and between 16:00–18:00hrs on the same day for the evening peak period.
- 3.9 AECOM's Transport Statement concludes that the Order Land currently generates the following traffic volumes:
- a. Approximately 145 two-way trips a day (61 trips arriving and 84 trips departing, calculated by extrapolating the average hourly profile by the 10.5hr store opening hours), of which 13% are HGVs;
 - b. 16 two-way trips (9 trips arriving and 7 trips departing) in the AM peak hour (08:00-09:00hrs), of which 15 are vehicles (including 2 HGVs); and
 - c. 9 two-way trips (3 trips arriving and 6 trips departing) in the PM peak hour (17:00-18:00hrs), of which all are vehicles (0 HGVs).
- 3.10 Bellaview Properties Limited, the freehold owner of the Order Land, have also submitted a Transport Assessment as part of their application for the "*construction of a building ranging in height from 6 to 15 storeys, to provide builders merchants (Use Class Sui Generis) at ground and first floor level, and 185 self-contained residential units (Use Class C3) and associated amenity space above; hard and soft landscaping works; provision of car and cycle parking; works to provide means of access for both pedestrians and vehicles from Horn Lane and all other works incidental to the development. (Following demolition of existing builders' merchants)*" (**Bellaview's Development**).
- 3.11 The Transport Assessment was prepared on behalf of Bellaview Properties Ltd. by Velocity Transport Planning and is dated November 2022 (**Bellaview's Transport Assessment**) [JD2]. Bellaview's Transport Assessment is based on an Automatic Traffic Count survey, which was undertaken for seven days in December 2021, and records the Order's Land current vehicle demand as:

- a. 948 two-way movements in total over a week (noting that the Site is closed on Sunday);
 - b. Average of 158 two-way movements per day;
 - c. Average of 22 two-way vehicle movements in the peak hour; and
 - d. 5% of the vehicles accessing the Site are HGVs.
- 3.12 The Manual Classified Count undertaken in November 2022 presented by AECOM and Automatic Traffic Count undertaken in December 2021 presented by Velocity Transport Planning show similar profiles of trips and gives a sense of validation to both datasets given the small marginal differences.
- 3.13 Bellaview's Transport Assessment includes an estimate of the traffic generated by its proposed mixed-use development, and concludes that it would not have a detrimental impact on the local transport networks.

4. THE PROJECT – PROPOSED TRIP GENERATION AND IMPACTS

Trip generation

- 4.1 It is anticipated that the Project would be operated mostly over weekends and overnight, and the Order Land would typically be used on alternate weekends. There may be periods where the Order Land would be used on consecutive weekends, but this is likely to occur infrequently. The following vehicles are anticipated to be required:
- a. 5 low loaders carrying 10 RRVs per weekend (each low loader can carry 2 RRVs), which would be likely to drop-off the RRVs on Friday or Saturday with vehicles arriving and departing during the daytime (10 two-way movements), and returning to pick-up the RRVs on Monday, with vehicles arriving and departing during the daytime (10 two-way movements);
 - b. 2 lorry / flatbed deliveries to bring materials, anticipated to arrive / depart weekend daytime;
 - c. 8 vans / cars per shift (3 shifts in a 29-hour possession period), forecast to arrive in the hour before the shift starts and depart in the hour after the shift ends; and
 - d. 8 minibuses per shift (3 shifts in a 29-hour possession period), likely to arrive in the hour before the shift starts and depart in the hour after the shift ends.
- 4.2 In summary, it is anticipated that during a typical weekend possession the Project would generate 24 two-way HGV movements and 96 car / minibus two-way movements.
- 4.3 The 5 low loaders are anticipated to drop-off the RRVs on Friday or Saturday daytime, and return to pick them up on Monday daytime. As such they will arrive and depart outside the network weekday AM and PM peak hours. Staff arrivals and departures would occur from late Saturday night to very early on Monday morning, and therefore once again outside of the weekday peaks. Instead, it would be expected that they would take place during quiet periods on the highway network.
- 4.4 The construction/access compound on the Order Land may also occasionally be used for midweek night-time track access and is expected to generate the following vehicle movements:
- a. 6 vans / cars per shift, likely to arrive in the hour before the shift starts and depart in the hour after the shift ends; and

- b. 3 minibuses per shift, anticipated to arrive in the hour before the shift starts and depart in the hour after the shift ends.
- 4.5 No HGV movements are anticipated to be generated during a weekday possession.
- 4.6 The construction/access compound may also occasionally be used for midweek daytime use with general compound activities taking place. This would typically generate:
 - a. 5 cars; and
 - b. 1 HGV, likely to arrive / depart outside the network peak hours.
- 4.7 Staff arrivals and departures are forecast to occur outside the network AM and PM peak hours and occur infrequently. Therefore, the impact on the transport network is considered to be negligible.
- 4.8 The Project also seeks to retain connectivity through the Order Land to Plot 1 which will provide access to the railway for future maintenance. This will be for occasional use only, with vehicle movements being very limited, and occurring outside network peak hours. Therefore, the impact on the highway network is, again, considered to be negligible.

Impacts

- 4.9 Overall, while the Project is anticipated to generate a maximum of 120 two-way movements (of which 24 are HGVs) during a weekend possession, very few of these trips are anticipated to occur during the weekday AM and PM peak hours. As such, the proposed use of the Order Land for the Project would result in a significant reduction in weekly vehicle movements when compared to the existing use of the Order Land as a builder's merchants, and there would be negligible impact on the highway network during the weekday AM and PM peak periods.

5. BELLAVIEW DEVELOPMENT – TRIP GENERATION AND IMPACTS DURING CONSTRUCTION

- 5.1 Bellaview's Outline Construction Logistics Plan (**CLP**) anticipates that construction of its proposed development would start in Q4 2023 and end in Q2 2025, and the core working hours would be as follows:
 - a. 08:00 - 18:00 hours on weekdays;
 - b. 08:00 - 13:00 hours Saturdays; and
 - c. Working on Sundays / Public Holidays would be subject to reasonable notice.
- 5.2 Any work outside these hours would be subject to prior agreement and / or reasonable notice given to LBE as Planning Authority.
- 5.3 The number of vehicles anticipated to be required during the construction period is not stated.
- 5.4 Bellaview's Outline CLP sets a framework from which construction trips would be managed, with a Detailed CLP to be secured via a Planning Condition and approved by LBE prior to commencement of works on the Order Land.

6. BELLAVIEW DEVELOPMENT – TRIP GENERATION AND IMPACTS DURING OPERATION

- 6.1 Bellaview's Transport Assessment considers the trip generation associated with the proposed residential and builders' merchant uses:
- a. The residential element would generate a total of 870 all-mode two-way trips per day; of these, 695 would be by public transport, 14 would be by motorcycle and there would be no private car trips as the development is car-free except provision of blue badge bays;
 - b. In addition, 26 two-way servicing and delivery trips are anticipated to be generated by the residential element per day, comprising 2 HGVs and 24 LGVs; and
 - c. The builders' merchant would generate 227 total daily two-way trips, including 11 HGVs.
- 6.2 Overall, Bellaview's Development is anticipated to result in a net increase of 110 two-way vehicle trips per day when compared to the Existing Use.
- 6.3 The conclusion to Bellaview's Transport Assessment states that *'the effect on the local highway network is considered negligible as very few additional vehicles will be added to the network due to the development, mostly servicing and delivery vehicles'*.
- 6.4 Minor changes to Bellaview's development were proposed after submission of Bellaview's planning application. These included a change to the residential unit mix, although no change to the total number of units (185), and a minor reduction in the floor area of the builders' merchant (from 4,316sqm to 4,274sqm GEA). A Transport Assessment Addendum dated May 2023 was submitted by Bellaview to assess the impact of these minor changes and concluded that the *'summary and conclusions set within the Transport Assessment are still appropriate, and the revisions to the scheme will have a negligible transport impact'*.

7. SITE SHARING – PROPOSED TRIP MOVEMENTS AND CUMULATIVE IMPACTS

- 7.1 As explained in Mr Sinclair's Proof of Evidence, at the date of this statement Network Rail is negotiating with Bellaview with a view to establishing whether the parties can share the Order Land to allow Network Rail to deliver the Project whilst Bellaview takes initial steps to bring forward Bellaview's development. Whilst no agreement has been reached at the date of this statement, I have been asked to consider cumulative impacts of the two schemes proceeding at the same time.
- 7.2 The majority of vehicle movements associated with the Project would not coincide with vehicle movements associated with construction and operation of the Bellaview Development, with most vehicles arriving before and departing after the rail possession period (typically midnight to early hours of the morning) with minimal trip movements likely to occur during the daytime. Therefore, the impact on the highway network of traffic generated by the Project is considered to be negligible, both during the construction of, and also during the operational phases of, Bellaview's development.

8. RESPONSE TO OBJECTIONS

- 8.1 The only statutory objector to the Project who has raised transport implication issues is Bellaview. Those objections have been amplified by Bellaview in their Statement of Case. In this section I provide a response to the matters raised.
- 8.2 In paragraph 8.7 of Bellaview's Statement of Case, Bellaview submit as follows:

"The nature of NR's proposed operation is likely to have significant transport implications, yet inexplicably NR has not provided a Transport Assessment or Travel Plan. NR has also failed to

submit a parking management plan, despite the fact its proposals seek to increase the levels of parking at the Property".

8.3 Paragraph 8.12 further provides as follows:

"Given the absence of any form of Transport Assessment, NR has failed to properly assess the effect of the proposed use of the Property on the operation and safety of users of the local highway network, as well as the use of the local highway network generally. Instead, it makes the following unsubstantiated assertions in its Rebuttal regarding trip generation and transport impacts as associated with the proposed use of the Property:

- (a) just-in-time deliveries "would increase the levels of vehicle movements significantly during night-time hours increasing noise and light pollution" (paragraph 19);*
- (b) "... deliveries of rail associated materials will be significantly less than the amount of construction materials currently being delivered by HGV and then collected by customers in a combination of vans, cars and HGV's associated with a retail/trade builders merchants" (paragraph 25);*
- (c) "...based on the existing use on site and the compared to proposed temporary use of site further assessment by Network Rail is not required as we believe we will cause less traffic and less disturbance than the existing busy builder's merchant" (paragraph 26).*

Without any evidence in the form of a Transport Statement or Transport Assessment, as well as information about proposed HGV construction traffic routes and servicing and deliveries, the SoS cannot attach any weight to the bare assertion made by NR in relation to highway impacts and safety."

- 8.4 AECOM has prepared a Transport Statement, a copy of which is appended to this Proof of Evidence [JD1]. This sets out the impacts of the Project and considers its cumulative impact together with Bellaview's development. Whilst there is anticipated to be a small increase in daily HGV movements during a weekend possession, these are likely to occur outside of the network peak hours and overall, the Project would result in a daily net reduction in total vehicle trips on the highway network (as compared to the Existing Use). Therefore, it is considered that the impacts would be negligible.
- 8.5 The Project will provide a temporary RRAP to assist with delivery of OOC Station and a permanent RRAP to enable future maintenance of the railway (as set out in detail in Mr Fleming's Proof of Evidence). This is therefore in line with Policy T3 of the London Plan which seeks to adequately safeguard and support the delivery of schemes such as HS2 as well as Policy T7 which should facilitate sustainable freight movement by rail. The Transport Statement assesses the transport impacts of the Project in accordance with Policy T4 of the London Plan. The Project's compliance with planning policies is further considered in Mr Field's Proof of Evidence.
- 8.6 In addition to the above, a review of highway safety has been undertaken in the Transport Statement with no collision clusters identified in the vicinity of the access to the Order Land. Vehicle tracking has also been carried out by the South Rail Systems Alliance (formed of Network Rail, Colas and AECOM) to demonstrate that HGV movements associated with the Project can be accommodated within the Order Land.
- 8.7 Car parking will be provided on the Order Land for staff. This has been based on the forecast number of staff anticipated to be on the Order Land and travel by car / van, as they would be required to travel during the night-time when public transport is not as frequent and / or available.

Further details of the level of car parking and how they will be managed will be set out within the Traffic Management Plan.

8.8 It is anticipated that a Traffic Management Plan (or Construction Logistics Plan) will be secured by means of a planning condition attached to any planning permission for the Project and prepared prior to commencement of any works on-site (as explained in detail in Mr Field's Proof of Evidence, which also provides wording of the proposed condition). This supports Policies T4 and T7 of the London Plan. The Traffic Management Plan would include:

- a. Operating hours;
- b. Proposed routing of HGVs and management of their movement into and out of the site by a qualified and certified banksman;
- c. Access arrangements and arrival/departure times of HGVs (to minimise the impact on the surrounding highway network);
- d. Travel initiatives for site staff;
- e. Parking provision for site staff;
- f. Engagement with local residents and businesses; and
- g. Contact details of the Project Manager and Site Supervisor responsible for on-site works.

8.9 As the use of the Order Land relates to the construction of OOC station and only constitutes a temporary land use, there is not considered to be a requirement to prepare a dedicated Travel Plan, Parking Management Plan and Delivery and Servicing Plan which are typically associated with permanent schemes.

9. CONCLUSION

9.1 In conclusion, the impact of the Project in transport terms is considered to be **negligible** as the number of trips are likely to be lower than the Existing Use and therefore would have less impact on the highway network. To the extent that if the Project were to operate in tandem with the construction/operation of Bellaview's proposed development, once again the impact (in cumulative terms) would not be sufficient. In so saying, I note that the traffic movements generated by the Project would very largely occur outside weekday peaks, and would mostly take place late at night or over weekends. A Traffic Management Plan will also be secured by means of a planning condition attached to any planning permission for use as a temporary RRAP use in order to manage the transport impacts.

10. WITNESS DECLARATION

10.1 This proof of evidence includes all facts which I regard as being relevant to the opinions that I have expressed and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion.

10.2 I believe that facts I have stated in this Proof of Evidence are true and that the opinions expressed are correct.

10.3 I understand my duty to the Inquiry to help with the matters within my expertise and I have complied with that duty.

A handwritten signature in black ink, appearing to read 'Jeremy Douch', written in a cursive style.

Jeremy Douch

Dated: 16th October 2023