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Christine Symes
Department for Communities and Local Government
Zone 1/H1
Eland House
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London SW1E 5DU

10th October 2011

Your ref: APP/B1930/A/09/2109433

Dear Ms Symes

**LAND IN AND AROUND FORMER AERODROME, NORTH ORBITAL ROAD,
HERTFORDSHIRE – APPEAL BY HELIOSLOUGH LTD**

Thank you for your letter of 15th September 2011. You ask us to make representations on three matters, specifically your 3 (a), (b) and (c). We do not feel qualified to comment on either 3 (a) or 3 (b), but with regard to 3 (c) we do consider that there are significant changes in circumstances which have developed since the close of the Public Inquiry and that these are sufficiently material to warrant the re-opening of the Inquiry.

Firstly, we can now see the actual traffic movements resulting from the widening of the M25 motorway. At the time of the Inquiry we only had mathematical projections as to what impact this would have on the feeder and distributor roads. The carrying capacity of the local road network was a key aspect of the Inquiry with everyone in agreement that it was a very finely balanced judgment. If the higher carrying capacity of the M25 has brought more traffic onto the A414 and A405, this could have significant consequences. It seems only sensible that a full and comprehensive traffic survey is now undertaken and the results presented to a re-opened Inquiry.

Secondly, the joint Luton and South Bedfordshire Local Development Framework (LDF) was agreed by both authorities, subsequent to the Inquiry's close. This agreed strategy incorporated a determination to progress the development of a Strategic Railfreight Interchange at Sundon Quarry just north of Luton. Indeed in the final report of the Public Inquiry into the Luton and South Bedfordshire LDF, the inspector specifically highlighted Sundon as "an obviously major and strategically critical employment site."

Although the Luton and South Beds LDF has since been withdrawn, this is for reasons entirely unconnected with the issue of location of a Strategic Railfreight Terminal.

This clear support from both local councils is in marked contrast to the opposition from both St Albans and Hertsmere local planning authorities to the Radlett Aerodrome proposals - and indeed to the opposition from local planning authorities in Berkshire to the Colnbrook site. The Luton and South Beds Inspector's remarks equally contrast with the observations of the inspector at the Radlett Aerodrome Inquiry, who noted that the proposed development there was 'inappropriate' and could only be acceptable if it could be shown that there was no other suitable site.

The Sundon site is suitable, it is located on the same Midland railway line as the Radlett site with no need for any additional major engineering works between Sundon and Radlett. Access to the M1 motorway southbound using the new Luton and Dunstable northern by-pass will be far less problematic than the complicated manoeuvres proposed for the Radlett site. It clearly has the support of the local councils. There is a large local pool of employees. This movement forward with the Luton & South Bedfordshire LDF proposals removes the argument put forward previously that proposals for the Sundon site are insufficiently developed.

The emerging National Planning Policy Framework and Localism agenda, all developed since the original Inquiry, emphasise the importance of rail freight but remove the reference to 'Strategic' hubs, suggesting they should be locally incorporated into LDF proposals. This further strengthens the case for sites such as Sundon, where there is identified support.

It seems clear that these are material changes in circumstances which can be best considered by re-opening the Public Inquiry, and we formally ask the Secretary of State to adopt this course of action in his further consideration of the application.

Yours sincerely

Alexander (Sandy) Walkington

David Parry