

BY POST AND EMAIL

Ms Christine Symes
Department for Communities and Local Government
Zone 1/H1
Eland House
Bressenden Place
LONDON
SW1E 5DU

16347/A3/SF/mg

27th March 2014

Dear Ms Symes

**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**

On behalf of our client, Goodman Logistics Development (UK) Ltd, we write further to your letter of 14th March 2014 in connection with the above planning appeal.

1. National Planning Practice Guidance

The National Planning Practice Guidance sits alongside the National Planning Policy Framework, to which our previous representations make reference. In relation to this particular planning appeal, we have no comments in respect of the content of the National Planning Policy Guidance or the associated cancellation of previous guidance documents.

2. Representations and Material Changes of Circumstances

We note that representations have made reference to developments at London Gateway and Sundon Park and can comment as follows:

- The implications of London Gateway for the proposed development have been previously considered. The Inspector concluded that London Gateway is not in the right location to serve the west of London and is a port complex as opposed to a SRFI¹. More recently, the Government has confirmed that the implementation of London Gateway will lead to an increase in logistics operations and as a consequence "will increase the need for SRFI development to reduce the dependence on road haulage to serve the major markets"². Therefore, we consider that the effect of London Gateway is actually to increase the need for SRFIs to serve London and the South East.

¹ Inspector's Report (March 2010) Paragraph 13.85.

² Draft National Policy Statement on National Networks (December 2013) Paragraph 2.43.

- Sundon Park has also been previously considered and the appellant's assessment of alternative sites comments that it has the potential to provide a smaller scale rail freight interchange serving the northern part of the Greater South East³. We note that the emerging local planning policy context for the area⁴ also envisages that a freight interchange in this location would be of a smaller scale and serve its immediate sub-region. Therefore, we do not consider that the emerging proposal at Sundon Park represents a material change in circumstances.

We have no further comments at this stage in respect of the other changes in circumstances or on the representations of St Albans District Council regarding the content of the Unilateral Undertaking.

Yours sincerely


 **SIMON FLISHER**
Director

³ Technical Report 6 – Consideration of Alternative Sites (March 2009) Paragraph 8.88.

⁴ Draft Central Bedfordshire Development Strategy (January 2013).