

Date: 21st August 2025
Our Ref: 25.5002

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Planning Policy
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To Whom It May Concern:

Re: St Albans Local Plan – Additional Documents Consultation

These representations to the 'Additional Documents Consultation' are submitted by Boyer Planning Ltd on behalf of our client, TT Group, in connection with their site at Marlborough House, 18 Upper Marlborough Road, St Albans, AL1 3UT ('the Site'). These representations should be read in conjunction with TT Group's earlier representations at both Regulation 18 and Regulation 19 stages of the draft St Albans Local Plan, as well as TT Group's written representations regarding Matters 1, 2 and 3 of the Examination in Public and associated verbal representations at the Hearing Session on 30th April 2025.

As with TT Group's previous representations, these representations raise significant concerns regarding the soundness of the draft St Albans Local Plan in the context of the Council's failure to demonstrate that they have maximised the opportunity to meet housing needs through the use of previously developed land within the existing built-up area. As set out within their previous representations, TT Group contend that the Council have failed to clearly set out the methodology used to identify potential development sites and the subsequent assessment of these potential development sites for inclusion in the draft St Albans Local Plan as site allocations. In the continued absence of a clear methodology for either the identification of potential development sites or the subsequent site selection process, TT Group maintain their position that the draft St Albans Local Plan is unsound.

Whilst the 'Site Sifting Process Addendum (July 2025)' that has been published by the Council as part of the 'Additional Documents Consultation' following Stage 1 of the Examination in Public seeks to provide further clarification regarding the Council's approach to identifying and assessing potential development sites, it simply clarifies the number of sites that were identified and assessed at each stage. The 'Site Sifting Process Addendum (July 2025)' does not provide any further detail on the site identification process, including the criteria for including or excluding sites from the initial site search. Nor does the 'Site Sifting Process Addendum (July 2025)' provide any further information on the methodology used in the subsequent sifting exercise.

The following representations are framed by those specific questions as set out by the Inspectors with regards to Matter 2 (Housing Growth and Spatial Strategy) of the Examination in Public and to which TT Group have previously made written representations.



Q1: What were the reasons for discounting sites at the initial assessment stage? Was this done on a consistent and transparent basis?

As set out in their previous representations, TT Group contend that neither the draft St Albans Local Plan nor the associated evidence base set out the methodology which was used to identify and subsequently assess brownfield sites. The additional information within the 'Site Sifting Process Addendum (July 2025)' does not provide any further information on the reasons for discounting sites as part of the assessment stage. Consequently, it remains TT Group's view that the site assessment not undertaken on a consistent and transparent basis.

TT Group are particularly concerned that the 'Site Sifting Process Addendum (July 2025)' does not provide any further information on the methodology adopted in identifying potential sites at any stage, and in the absence of any transparency on how those sites taken forward for assessment were identified it is unclear which, if any, other sites were discounted by the Council before the initial assessment stage.

It is therefore contended that the Council continue to fail to disclose which sites were discounted from the initial assessment, and the reasons for their exclusion. In failing to provide a consistent and transparent approach to the initial identification of brownfield sites, it is contended that the Council have failed to assess all available sites, including Marlborough House which represents a vacant brownfield site which should have been identified and assessed transparently through the Urban Capacity Study, and which was actively promoted by the landowner at the Regulation 18 stage consultation.

Overall, the draft St Albans Local Plan and the associated evidence base, including the 'Site Sifting Process Addendum (July 2025)' fails to demonstrate that SACDC have identified and assessed all available brownfield sites in a consistent and transparent manner. This suggests that the Council have not identified all potential brownfield sites, and therefore the allocation of sites within the draft St Albans Local Plan is not justified. The draft St Albans Local Plan is consequently unsound.

Q8: Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

Despite the additional information set out within the 'Site Sifting Process Addendum (July 2025)' TT Group maintain their position that the Council have failed to identify all available brownfield sites, and thus the selection of potential sites that were subsequently assessed was not exhaustive.

Although the Council suggest they adopted a 'no stone left unturned' approach in identifying potential sites, it is evident from the 'Site Sifting Process Addendum (July 2025)' that the Council's approach to the site search was inconsistent and not transparent. Indeed, the 'Site Sifting Process Addendum (July 2025)' suggests that majority those site allocations within the draft St Albans Local Plan were primarily identified through either the 'Call for Sites' process, which focused on identifying potential sites within the green belt and urban greenfield sites, and the Urban Capacity Study ('UCS') which focused on identifying brownfield sites within urban areas. Whilst the 'Site Sifting Process Addendum (July 2025)' suggests that the initial search undertaken as part of the Urban Capacity Study in 2021 identified the majority of the brownfield sites that were subsequently assessed, this exercise was not conclusive and the 'Site Sifting Process Addendum (July 2025)' notes that further

sites were identified after the Urban Capacity Study (2021), up to and including at the Regulation 18 consultation in 2023.

At Appendix 2, Table C of the 'Site Sifting Process Addendum (July 2025)' the Council note that additional sites were identified at the following stages, with the number of sites that were identified at each stage and how many of these sites were discounted as part of the site sifting exercise also set out.

- Sites identified pre-Reg 18 as urban sites from the HELAA
- Sites identified pre-Reg 18 sourced from the historic SHLAA (2009 - 2016) or Brownfield Land Register (2021)
- Further sites identified pre-Reg 18 by the Council
- Additional sites submitted by the landowner/ developer at Reg 18
- Site identified pre-Reg 19

Notwithstanding TT Group's grave concerns regarding the scope of the Council's initial site search exercise that was undertaken as part of the Urban Capacity Study in 2021, which are set out in TT Group's representations to Matter 2, the 'Site Sifting Process Addendum (July 2025)' raises further concerns regarding the thoroughness of the identification of additional sites at those subsequent stages (as outlined above). The 'Site Sifting Process Addendum (July 2025)' also provides limited information on the criteria against which these additional sites were assessed and therefore does not clearly state why those sites that have not been included in the draft St Albans Local Plan were discounted.

It is of particular concern that the 'Site Sifting Process Addendum (July 2025)' suggests that additional sites which were submitted by the landowner / developer at the Regulation 18 consultation stage were also considered. Appendix 2, Table 9 of the 'Site Sifting Process Addendum (July 2025)', indicates that only four additional sites were submitted by landowners / developers at the Regulation 18 consultation stage. It is noted that the four sites identified at Appendix 2, Table 9 do not include TT Group's site at Marlborough House, despite TT Group making representations at the Regulation 18 stage consultation proposing the site for allocation. Given the limited information provided within the 'Site Sifting Process Addendum (July 2025)' it is unclear whether any other sites were submitted at the Regulation 18 stage consultation, and if so, why these have been discounted prior to the proper site selection process (as is the case with Marlborough House).

The failure of the Council to identify all brownfield sites put forward by landowners / developers up to and including the Regulation 18 stage consultation raises significant concerns regarding the thoroughness of the identification of potential sites. As such it is contended that the draft St Albans Local Plan, and the associated evidence base, fails to demonstrate that all available brownfield sites have been identified in a consistent and transparent manner.

On the basis that it remains unclear whether the Council have identified all potential brownfield sites, the allocation of sites within the Draft St Albans Local Plan is not justified and consequently the draft St Albans Local Plan must be found unsound.

Conclusion

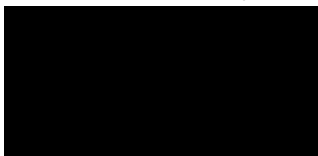
In summary, TT Group contends that the site selection process undertaken by SACDC for the draft St Albans Local Plan has not been carried out in a consistent, transparent, or robust manner.

The additional information provided within 'Site Sifting Process Addendum (July 2025)' does not provide clear and transparent detail in relation to the initial identification of sites, or subsequent assessment for allocation within the draft St Albans Local Plan. The absence of any clear rationale for the exclusion of sites from either the initial site identification or selection, continues to represent a significant flaw in the draft St Albans Local Plan.

As such, draft St Albans Local Plan fails to meet the tests set out within paragraph 36 of the NPPF and is therefore unsound.

We trust that our comments are of assistance and that the Inspectors will give due consideration to the recommendations that have been made.

Yours sincerely



James Cogan
Director

