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CBRE

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8th August 2025

Dear Mr Birkinshaw and Mr Bristow,

St Albans Local Plan Examination – Additional Documents Consultation 4 July - 22 August 2025

CBRE is instructed on behalf of Tarmac Trading Limited in respect of the Additional Documents Consultation.

Tarmac Trading Limited has 2 x omission sites in the Draft Local Plan:

- **Land at Colney Heath (CH-14-21)**
- **Land at Tyttenhanger (CH-06a-21, CH-06b-21-1 and CH-06b-21-2)**

We do not refer in specific terms to these omissions sites within this response but note that both are located in Colney Heath which is relevant for how the Council has approached this settlement in the site selection process.

Whilst not within the scope of this consultation, we would like to continue to reiterate our concerns around the Council have discharged its obligations under the Duty to Cooperate.

Highways Evidence

We reserve the right to comment on SADC/ED76 (A), (B), (C) which all pertain to relevant highways updates. SADC/ED76 clearly states that at both the local and national highways level conversations remain ongoing and will culminate in an updated Statement of Common Ground (SoCG) which will be provided in Autumn 2025. This will be key in assessing the soundness of the plan and we assume that Participants will be given the opportunity to comment on this.

Site Selection Process

Both of the omission sites of Tarmac were discounted as they were located outside of the Green Belt Buffers, along with a further 83 sites. This stage in the site selection methodology was the most significant in terms of impact and consequence with almost 25% of sites being rejected at this point. The robustness of this approach is thus highly relevant in considering soundness.

As anticipated through the Stage I Hearings and now confirmed by **SADC/ED81** the site selection process was an entirely linear one. There is no suggestion within **SADC/ED81** that there was any check-back loop or re-evaluation of the methodology once the Council had sifted the number of sites so significantly that it resulted in a significant shortfall in homes to meet the objectively assessed needs for housing in the first five years of the plan period.

The need for a review/feedback loop to be undertaken is entirely consistent with the relevant section of the Planning Practice Guidance (an accompanying flow diagram in the PPG). As noted:

“What happens if the assessment indicates that there are insufficient sites / broad locations to meet needs?”

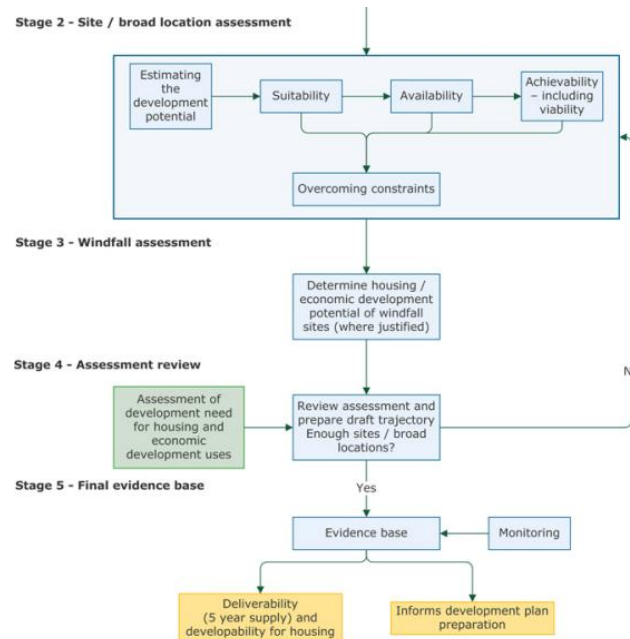


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When preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need.

In the first instance, strategic policy-making authorities **will need to revisit their assessment**, for example to carry out a further call for sites, **or changing assumptions about the development potential** of particular sites to ensure these make the most efficient use of land. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport.”



In response to the Inspectors’ Initial Questions, the Council states that a stepped housing requirement is justified to allow sufficient time for the significant uplift in housing delivery to be realistically delivered. The stepped requirement is proposed as 485 dwellings per annum for the first 5 years post adoption of the Plan, rising to 1,255 dwellings per annum in years 6-10. In the context of the significant levels of unmet need that have arisen as a consequence of a lack of an up-to-date plan it is clear that the NPPF (2023) would expect needs to be met within the first five years rather than delayed. The approach to the Site Selection process set out by the Council would cast doubts as to the Council’s conclusions that “no stone was left unturned.”

As presented orally during the Stage I Hearings, in itself the approach to the Green Belt methodology and the approach of the buffers is not unsound, however, the way that it manifests through the site selection process demonstrates how it becomes a soundness issue. The buffers approach represents a useful sense check of general Green Belt principles and sustainability, however, alone it should not be determinative of site selection for the reasons set out below.

From the ARUP Green Belt Report (2023) (**GB 02.02**) we note that the villages washed over by the Green Belt were not assessed and so not included in the buffers assessment. The consequence of this is that all sites in Colney Heath are discounted at Stage 2 of the sifting process. If we have understood correctly then the approach of the Council would have precluded any site being allocated for development in Colney Heath. Having reviewed the Sustainability Appraisal (SA), there is nothing in there that would suggest that allocations in Colney Heath need to be avoided as an absolute point of principle, to the contrary the SA confirms that a number of schemes have recently been permitted in Colney Heath which would confirm (1) its appropriateness as a location to accommodate development in principle and (2) the market interest in developing in this area.

Notwithstanding the above, two obvious further sense checks that would have been relevant to undertake are as follows:

1. **Relationship to Emerging Settlements** – in respect of Land at Tyttenhanger, this is adjacent to a significant allocation being brought forward by Hertsmere Borough Council as a standalone

settlement. The site selection methodology in the bluntness of its application would not allow sites such as this to be considered. The absence of this consideration also casts doubts as to how the Duty to Cooperate has been successfully discharged in respect of the ongoing engagement with Hertsmere.

2. **Looking at Smaller Areas** – in respect of Land at Colney Heath, part of this allocation is adjacent to the existing village. There is no review of reflection within the methodology as to whether or not small land parcels (than the whole) could be brought forward for assessment.

We suggest that through any Main Modifications Consultations this process is re-run in order to identify the necessary sites to meet objectively assessed housing needs. In our submission sites have been prematurely excluded from the assessment process that could make a valuable contribution to meeting housing needs in the first five years of the Local Plan.

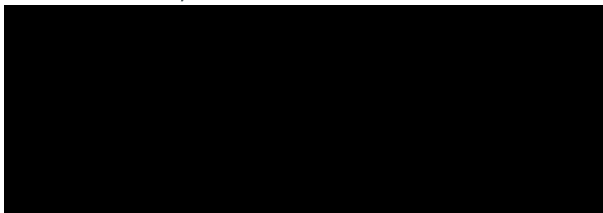
Chilterns National Landscape

As set out in **SADC/ED80A** we note that the Council is now proposing the re-instatement of sites M14, M24 and M26 which were previously unallocated from the Reg 19 process due to their potential conflict with the proposed extension to the Chilterns National Landscape. The National Landscape Board has since confirmed formally that it will not be pressing ahead with the proposed extensions.

As set out by the Council, any suggested inclusion of these sites should be undertaken as part of the Main Modifications process. At this stage we have no specific comments to make on these sites as they are not before the examination and remain omission sites but will provide comment at the Main Modifications stage in the event that they continue to be proposed to be reintroduced.

We would be grateful for formal confirmation of these representations having been received.

Yours sincerely,

A large black rectangular box redacting the signature of Adam Kindred.

Adam Kindred | Senior Director
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