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24th September 2025

Dear Mr Birkinshaw and Mr Bristow,

St Albans Local Plan Examination – MIQs for Stage 2 - Matter 2 – Issue 2 (Question 3) – Site Selection Methodology

CBRE is instructed on behalf of Tarmac Trading Limited in respect of the St Albans Local Plan Examination in Public (EiP).

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)**

6. Natural England has confirmed that it is no longer pursuing an extension to the Chilterns National Landscape (formerly referred to as the AONB). The potential extension of the AONB had previously informed the Council's decision not to allocate certain sites for development. Through Examination Document SADC/ED80B it is now suggested that the sites should form part of the Local Plan to ensure that it is justified and sound.

Q3. If the sites are necessary, are they justified, effective and consistent with national planning policy?

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.

We consider that the National Landscape Boards decision to not press ahead with the proposed extension is unjustifiably being taken to assume that this is in some way reflective of the sites not having landscape value. The response of Natural England to the Additional Documents Consultation states that in their view the sites should be considered as Valued Landscapes. Paragraph 108a of the NPPF (2023) is clear that *“Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).”*

The acknowledgement of these sites as being within valued landscape does present cause for further consideration for how these sites (and others) have been assessed in the Sustainability Appraisal. To our knowledge, LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) presents these sites as having a “green” rating in respect of AONB. We would assume that such a view is given on account of the sites not being located within the AONB. However, the simplicity of this assessment does not capture the harm that would present from developing on valued landscapes. Had this been reflected in the assessment it is likely to have resulted in other sites being considered ahead of these as they would not necessarily be valued landscapes and thus, in principle, more likely to be able to accommodate development without significant mitigation being required.

There are omission sites, such as Tarmacs, that if allocated would resolve the soundness issues identified.



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

Yours sincerely,



Adam Kindred | Senior Director
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