

Louise St John Howe
PO Box 10965,
Sudbury,
Suffolk
CO10 3BF

CBRE

CBRE, Inc.
Henrietta House
Henrietta Place
London W1G 0NB
+ 44 7787 270 837
Adam.kindred@cbre.com

24th September 2025

Dear Mr Birkinshaw and Mr Bristow,

St Albans Local Plan Examination – MIQs for Stage 2 - Matter 5 – Issue 1– Employment Land Requirement

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)**

Matter 5 – Economy and Employment Issue 1 – Employment Land Requirement and Allocated Employment Sites

Q2 Noting the Council's hearing statement for Matter 1, Issue 1, Question 5, should the Plan establish requirements for office, industrial and warehousing provision over the Plan period?
Q3 Is the Plan positively prepared in respect of setting a strategy and identifying land to meet assessed employment needs?
Q5 How will the allocated sites at East Hemel Hempstead (Central) and the Radlett Strategic Rail Freight Interchange assist Dacorum and potentially other South West Hertfordshire authorities in meeting some of their employment needs? Is the policy effective?

Question 2

In respect of Q2, for soundness the Plan should set out the requirements for office, industrial and warehousing provision over the Plan period. Paragraph 16(D) is clear that *"plans should...contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals."* Including the stipulated requirement is needed to ensure that the supply can be monitored during the plan period as part of annual monitoring reports.

In the interest of an effective and positively prepared Plan, St Albans' full requirement should be stated, alongside the full quantum of allocated land. In the event that there is over-delivery earmarked for another authority, the quantum of this should be clearly stated. Currently, it is unclear how much land St Albans requires, how much is being provided to meet Dacorum's unmet need, and what may be available to meet unmet need elsewhere.

Question 3 & 5

Tarmac notes that the primary objective of the Draft Local Plan, in terms of employment provision, is to encourage strong and resilient economic growth, and employment and skills opportunities, including supporting growth in green and creative sectors and new ways of working across the District. Tarmac is supportive of these overarching objectives, but is concerned that Strategic Policy SP5 places too much emphasis on new employment delivery from only two strategic locations: East Hemel Hempstead, and the permitted Strategic Rail Freight Interchange (SRFI) at the former Radlett Aerodrome.



www.cbre.co.uk
Registered in England No 3536032 Registered office St. Martin's Court 10 Paternoster Row London EC4M 7HP
CBRE Ltd is regulated by RICS



As set out in Policy SP5, the Plan's employment land supply consists of two strategic sites:

- 33.16ha at the former Radlett aerodrome – A Strategic Rail Freight Interchange (B8 distribution / warehousing); and
- 53ha at East Hemel Hempstead (Central) - A range of uses including offices, research and development, light industrial and distribution. Nowhere does the Plan set out anticipated delivery timeframes for these sites, and it is not clear when they are expected to come forward, and whether they will be built out in full within the Plan period.

To be positively prepared the Plan should be providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

It is acknowledged that the Council in pursuing the East of Hemel Hempstead and Strategic Freight Interchange is delivering employment land at a level that will respond to bigger than local needs. However, the seemingly sole focus at this strategic scale manifests as a soundness matter in not ensuring that local needs are met. In framing discussion around need, it is important to consider that need is both qualitative and quantitative. In our view the approach of the Council to the delivery of employment land has been to solely focus on the quantitative over figure, rather than the nature of sites that are included to meet such a figure. The PPG is clear on this point in stating:

"Analysing supply and demand will allow policy makers to identify whether there is a mismatch between quantitative and qualitative supply of and demand for employment sites. This will enable an understanding of which market segments are over-supplied to be derived and those which are undersupplied."

The Council's own Economic Study (EMP01.01) in part acknowledges this in stating:

"As noted in Chapter 7, a significant proportion of the existing commitments (331,665 sq m) relate to a single site (Radlett Strategic Rail Freight Interchange). This is a unique development in that it will comprise a small number of very large B8 distribution warehouses that are rail linked. 8.13 It was noted at paragraph 7.24 that this site will serve both national and regional markets. Therefore it could be argued that development at Radlett cannot be considered to be meeting South West Hertfordshire Economic Study 2024 128 the needs of the FEMA as it serves a far larger catchment area. We agree that Radlett will be meeting demand across a much larger geographical area than existing employment sites in South West Herts, and therefore it would be inappropriate to assume that the whole of the site could address the need in the preferred scenario."

The pursuit of larger, strategic employment allocations is compared to the local economic landscape for St Albans which as set out in paragraph 5.6 of the Plan, states that St Albans has a high proportion of small businesses:

"Figures for 2022 [show] that out of 8,675 enterprises 91.4% were micro-businesses (employing up to 9 people), 7.1% were small businesses (employing 10 to 49 people), 1.2% were medium sized organisations (employing 50 – 49) and just 0.4% were large organisations (employing 250 plus)."

Against an objective to "encourage strong and resilient economic growth, and employment and skills opportunities, including supporting growth in green and creative sectors and new ways of working across the District" it is difficult to see how the proposed approach of the Draft Local Plan and the allocation at the SFRI and East Hemel will respond to the make-up of existing businesses within the District and how these will be supported going forward as their need to additional space grows. This is a key requirement of the NPPF which states at Paragraph 85 that "planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt."

More broadly, given the time lag associated with the development of SFRI and East Hemel it would appear that the meeting of employment land needs is essentially back ended in the plan period. More immediate sources of employment land should be considered to ensure development in the earlier years of the plan and avoid a situation with economic growth is constrained through a lack of supply in the early years of the Plan.

As set out by Turley in the Regulation 19 Response, Tarmac considers that whilst the Draft Local Plan makes sufficient overall quantitative employment provision, the majority of the new, non-B8, jobs will be centralised west of the M1, on the boundary with Dacorum Borough. Given the dispersed rural nature of the St Albans district, such a singular spatial strategy for employment provision will increase the need to travel from other areas of the district, over the Plan period. In addition, the intensification of the existing employment stock is also likely to cause likely transport issues, as many of the current Protected Employment Areas are located in areas of the district, which are already subject to traffic congestion issues.

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

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

Yours sincerely,



Adam Kindred | Senior Director
CBRE LTD | UK Development - Planning