

Marlborough House, 18 Upper
Marlborough Road, AL1 3UT

Hearing Statement – Matters 3, 4, and 5

Boyer

Prepared on behalf of TT Group | September 25

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TABLE OF CONTENTS

1. Introduction	3
2. Matter 3 – Green Belt	4
3. Matter 4 – Type and Mix of Housing	7
4. Matter 5 – Economy & Employment	11
5. Conclusion	15

1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer Planning Ltd ('Boyer') on behalf of our client, Telereal Trillium Group ('TTG'), in relation to Stage 2 of the Examination of the Draft St Albans Local Plan Regulation 19 Publication Version (September 2024) ('Draft Local Plan').
- 1.2 The representations contained in this Hearing Statement are made in the context of TTG's land interests within the District, namely the existing vacant office building at Marlborough House, 18 Upper Marlborough Road, St Albans, AL1 3UT.
- 1.3 This Hearing Statement does not seek to rehearse those representations previously submitted on behalf of TTG Regulation 18 and Regulation 19 stages or Stage 1 of the Examination of the Draft Local Plan.
- 1.4 This Hearing Statement responds directly to those Matters, Issues and Questions ('MIQ') raised by the Inspectors. Specifically, this Hearing Statement responds to Matter 3 (The Green Belt), Matter 4 (Type and Mix of Housing), and Matter 5 (Economy and Employment).

2. MATTER 3 – GREEN BELT

Issue 1 - Green Belt Review

Q1: With reference to paragraph 146a of the Framework, has the Council adequately demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised land?

- 2.1 Paragraph 146 of the National Planning Policy Framework (2023) ('NPPF') stipulates that before proposing any changes to Green Belt boundaries, strategic policy-making authorities – in this case St Albans City & District Council ('the Council') – must demonstrate that they have *'examined fully all other reasonable options for meeting its identified need for development'*. In assessing whether all other reasonable options have been examined, paragraph 146(a) of the NPPF states that it should be assessed whether the strategy *'makes as much use as possible of suitable brownfield sites and underutilised land'*.
- 2.2 In this context it is contended that neither the Draft Local Plan nor the associated evidence base demonstrate that the Council have made as much use as possible of suitable brownfield sites and underutilised land before concluding that exceptional circumstances existing to justify those changes to Green Belt boundaries as is proposed within the Draft Local Plan. The Council's failure in this regard is particularly profound given the Draft Local Plan seeks to allocate Green Belt land in order to meet 65% of the identified housing needs.
- 2.3 Despite the allocation of significant parts of the Green Belt within the Draft Local Plan, at paragraph 3.12 of the Draft Local Plan the Council suggest they have adopted a brownfield-first approach. Indeed paragraph 3.12 of the Draft Local Plan states *'The Local Plan seeks to make the most efficient use of land in the District and has undertaken an extensive and rigorous search for Previously Developed Land (PDL) (also known as 'Brownfield land' in national policy) within existing built-up areas. The approach has been underlain by the concept of 'leaving no stone unturned' in the search for appropriate sites on brownfield land'*.
- 2.4 However, as TTG demonstrate in their earlier representations at Regulation 18, Regulation 19, Stage 1 of the Examination, and most recently the Council's 'Additional Documents Consultation', neither the Draft Local Plan nor the accompanying evidence base indicate that a brownfield-first approach has been adopted or that the Council make as much use as possible of suitable brownfield sites and underutilised land before concluding that exceptional circumstances exist to support the allocation of land within the Green Belt.
- 2.5 While it is not contended that all identified housing need could be accommodated through the efficient use of brownfield land and underutilised sites, and it is accepted that some land within the Green Belt would need to be released to meet residential and other development needs, the evidence provided by the Council indicates that the strategy does not make as much use as possible of suitable brownfield sites and underutilised land. Rather, the evidence points to the Council adopting an incomplete and non-exhaustive approach when identifying opportunities to meet housing need through either the use of as many suitable brownfield sites or underutilised land as possible.

- 2.6 The 'Site Sifting Process Addendum (July 2025)' that was published by the Council as part of the 'Additional Documents Consultation' which followed Stage 1 of the Examination of the Draft Local Plan, sought to provide further clarification on the Council's approach to identifying and assessing potential development sites, including the Council's claim to have adopted a brownfield-first approach. However, the 'Site Sifting Process Addendum (July 2025)' simply clarified how many sites were identified and assessed at each stage and does not provide any further details on the site identification process itself, or the criteria that was used to when identifying those sites to include or exclude from the initial site search and subsequent assessment stages.
- 2.7 As a result of the absence of any further information within the 'Site Sifting Process Addendum (July 2025)' it can only be concluded that the Urban Capacity Study (2021), which formed the foundation for identifying brownfield sites, was not exhaustive, and that therefore the Council have failed to demonstrate that the Draft Local Plan makes as much use as possible of suitable brownfield sites and underutilised land.
- 2.8 This failure has been compounded by the Council's subsequent failure to identify and assess additional suitable brownfield sites and underutilised land that were identified by landowners as part of the Regulation 18 stage consultation, or indeed which have been promoted via alternative routes (i.e. planning applications)..
- 2.9 For example. TTG's site at Marlborough House is a vacant and available brownfield site located within St Albans which was actively promoted for residential development by TTG at Regulation 18 stage and has subsequently been subject to two Full Planning Applications (Ref. 5/2022/2558 and Ref. 5/2023/2398). Despite this, there is no evidence that the Council either identified Marlborough House as a potential brownfield residential development opportunity or assessed the Site as part of the site sifting exercise.
- 2.10 The Council's claims to have adopted a 'no stone unturned' approach to identifying suitable brownfield sites is therefore not supported by evidence. The Council's evidence points to only four additional sites promoted by landowners or developers being considered for development following Regulation 18, raising serious concerns about the completeness and transparency of the Council's process of identifying and assessing as many potential brownfield sites as possible for residential development.
- 2.11 This failure is especially relevant given the Draft Local Plan proposes to release approximately 802 hectares of Green Belt land, delivering around 9,750 homes – equating to 65% of the total housing allocations. The significant reliance on Green Belt release as part of the Draft Local Plan is inconsistent with the objectives of the NPPF to maximise the capacity of brownfield sites to meet housing needs before altering Green Belt boundaries only in exceptional circumstances.
- 2.12 It is on this basis, that it is concluded that the Council has not demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised sites, and therefore the Draft Local Plan does not comply with paragraph 146(a) of the NPPF.

- 2.13 In summary, the Council has not demonstrated that it has made as much use as possible of suitable brownfield sites and underutilised land. The site selection process lacks transparency and has excluded available and promoted brownfield sites such as Marlborough House. Furthermore, the Draft Local Plan relies excessively on Green Belt release and includes policy provisions that frustrate the efficient use of land. As such, TTG must conclude that the Draft Local Plan is neither consistent with national policy nor justified and must therefore be found to be unsound.

3. MATTER 4 – TYPE AND MIX OF HOUSING

Issue 1 – Housing Mix and Density

Q1: Is Policy HOU1 justified by appropriate, available evidence?

- 3.1 The South West Herts Local Housing Needs Assessment Update (2024) which forms the evidence base underpinning the housing mix requirement reflected in Policy HOU1, is largely based on data from the 2021 Census and was prepared in 2024, whilst the Draft Local Plan period extends to 2040.
- 3.2 The South West Herts Local Housing Needs Assessment Update (2024) sets out a 'SW Herts – Recommended Mix' at Table 8.27. Whilst the Housing Mix by Size and Tenure (Table 4.1) at Policy HOU1 broadly reflects the 'SW Herts – Recommended Mix' it is noted that the South West Herts Local Housing Needs Assessment Update (2024) also identifies a specific housing mix for St Albans at Table 8.20, which is different from the 'SW Herts – Recommended Mix'.
- 3.3 It is therefore unclear what the justification is for the adoption of the 'SW Herts – Recommended Mix' within Policy HOU1 rather than the 'Adjusted Modelled Mix of Housing by Size and Tenure – St Albans' at Table 8.20 of the South West Herts Local Housing Needs Assessment Update (2024).
- 3.4 Notwithstanding, the South West Herts Local Housing Needs Assessment Update (2024) also recognises that the existing and future housing mix is influenced by the types of housing site that are available, with greenfield sites more suitable for family sized housing than previously developed urban sites. It is therefore contended that the evidence base (i.e. South West Herts Local Housing Needs Assessment Update (2024)) would support a more nuanced approach to the housing mix requirement of Policy HOU1 to account for the different expectations for urban and rural sites.
- 3.5 It is therefore concluded that the housing mix requirements set out at Policy HOU1 of the Draft Local Plan is not based on the available evidence.

Q2: Is the Plan sufficiently flexible enough to adapt to changing circumstances and needs over the plan period?

- 3.6 The Draft Local Plan, and particularly Policy HOU1, does not provide sufficient flexibility to adapt to changing circumstances or housing needs over the plan period.
- 3.7 Whilst the proposed housing mix at Policy HOU1 broadly reflects the 'SW Herts – Recommended Mix' set out at Table 8.27 of the South West Herts Local Housing Needs Assessment Update (2024), this housing mix is based on the needs of the whole South West Herts Housing Market Area rather than St Albans specifically.
- 3.8 As acknowledged within the South West Herts Local Housing Needs Assessment Update (2024) itself, there are variations in the existing and future housing mix needs across the South West Hertfordshire Housing Market Area as a whole, and indeed within those constituent districts (i.e. St Albans) themselves.

- 3.9 In this context it is contended that Policy HOU1 of the Draft Local Plan which requires all developments of 10 or more homes to provide a housing mix in accordance with Table 4.1 of the Draft Local Plan is insufficiently flexible to account for either the specific needs within St Albans or changes in demand over the plan period.
- 3.10 As currently worded, Policy HOU1 only envisages flexibility from the housing mix at Table 4.1 where sites deliver specialist housing units.
- 3.11 It is therefore contended that Policy HOU1 is overly prescriptive and as such is unable to adapt to either the inevitable changes in circumstance over the plan period (up to 2040) or indeed the site-specific circumstances that may not allow development proposals to comply with the housing mix at Table 4.1.
- 3.12 Whilst paragraph 4.6 of the Draft Local Plan acknowledges that urban brownfield sites may require a higher proportion of smaller, flatted homes and fewer larger units, this is not reflected within the wording of Policy HOU1 itself, thereby limiting its effectiveness.
- 3.13 It is recommended that Policy HOU1 be amended to allow for departures from the housing mix identified at Table 4.1 to account for changing circumstances or to reflect different development typologies (for example, high-density flatted schemes on urban brownfield sites), changing demographic trends over time, and site-specific considerations such as location, viability, and urban design.
- 3.14 To be considered sound, we therefore recommend that Policy HOU1 be amended to embed greater flexibility, allowing site-specific housing mix proposals to be justified by location, viability, and market demand.
- 3.15 Without such changes it is contended that the lack of flexibility within Policy HOU1 risks constraining the efficient and effective use of land, which in turn will limit the ability of the Draft Local Plan to meet identified housing needs through the efficient and effective use of land.

Q4: Is Policy DES3 consistent with paragraphs 128 and 146 of the Framework insofar as making an efficient use of land is concerned?

- 3.16 Paragraphs 128 and 146 of the NPPF require planning policies to support the efficient use of land to meet identified housing needs.
- 3.17 It is contended that whilst Policy DES3 states that development proposals should make efficient use of land, Policy DES3 links the suitability of optimising development and/or residential densities to the existing site context and/or site constraints, irrespective of the desirability of maintaining the prevailing character or setting.
- 3.18 This is contrary to paragraph 128 of the NPPF which requires planning policies to support development that makes efficient use of land, taking into account; identified need, the availability of land; local market conditions and viability; existing and future infrastructure capacity; the desirability of maintaining an area's prevailing character and promoting regeneration and change; and importance of securing well designed places.

- 3.19 In contrast to paragraph 128(d) of the NPPF, Policy DES3 of the Draft Local Plan does not allow for any consideration of the desirability of maintaining an area's prevailing character and setting, or the need to balance this against the desirability of promoting regeneration and change. Consequently, it is contended that Policy DES3 will not facilitate the effective use of land, with development proposals instead required to reflect the character and setting of the site context rather than making the efficient use of land.
- 3.20 Overall paragraph 128 of the NPPF requires planning policies and decisions to support the efficient use of land, taking into account of several factors. Where these factors are in competition, planning policies should allow for an appropriate balance to be reached that takes account of the overarching need to make efficient use of land. Such an approach is particularly important in local authorities such as St Albans where the availability of land is highly constrained and therefore the efficient use of available brownfield land is of particular importance if housing needs are to be met while minimising the release of Green Belt land.
- 3.21 Accordingly, it is recommended that Policy DES3 be modified to provide greater flexibility and to support development proposals that makes efficient use of land in line with the requirements of the paragraph 128 of the NPPF.

Issue 2 – Affordable and Specialist Housing

Q4: Is the viability review clause in Policy HOU2 justified and effective?

- 3.22 The proposed late-stage review mechanism referenced at Policy HOU2(h) is neither justified by evidence nor effective in practice.
- 3.23 The Local Plan Viability Assessment prepared by BNP Paribas Real Estate (2024) that underpins the Draft Local Plan does not provide a clear rationale for the inclusion of a late-stage review mechanism. In the absence of such a justification, the mechanism lacks a sound evidential basis.
- 3.24 The proposed trigger point for the late-stage review, at 80% occupancy, is considered to be particularly problematic. It is contended that at such an late stage in the development cycle, construction will be largely complete, leaving no realistic opportunity to secure additional affordable housing on-site and/or delaying the occupation of the remaining 20% of properties until a suitable Registered Provider is found or an off-site payment in lieu is agreed.
- 3.25 Moreover, the adoption of a late-stage review provides no incentive for developers to accelerate housing delivery.
- 3.26 It is contended that a more appropriate approach would be for the use of an early-stage review mechanism where proposals do not meet the policy compliant affordable housing requirement, and where development has not meaningfully been implemented within two years of the planning permission. It is contended that this would provide greater certainty to developers, incentivise delivery within a reasonable timeframe, and maximise the potential for on-site affordable housing where improved viability allows.

Issue 3 – Accessible and Adaptable Housing

Q1: What are the requirements in Policy HOU4 based on and are they deliverable and viable?

- 3.27 The requirements of Policy HOU4 are not adequately justified by the evidence base. It is unclear whether the Housing Needs Assessment demonstrates differential demand for accessible and adaptable housing across tenures. In the absence of such evidence, applying different requirements to affordable and market housing is not supported.
- 3.28 It is contended that in the absence of evidence justifying differing accessibility requirements across housing tenures, the most appropriate approach would be to apply a consistent standard across all tenures. This approach would ensure fairness and consistency in the application of standards and avoid the risk of schemes needing to be redesigned if the tenure mix changes (for example, where affordable provision is increased post-permission), as well as providing greater certainty for developers and registered providers.

4. MATTER 5 – ECONOMY & EMPLOYMENT

Issue 1 - Employment Land Requirement and Allocated Employment Sites

Q1: Is the Plan's economic strategy based on proportionate and up-to-date evidence?

- 4.1 The evidence base underpinning the Draft Local Plan clearly demonstrates that there is an oversupply of office accommodation across both St Albans, the District and the wider South West Hertfordshire Functional Economic Market Area ('FEMA').
- 4.2 In addition, the 2024 Authority Monitoring Report ('AMR') records there has been a net gain of 3,714sq.m of office floorspace during 2023/24, with 13.8% of existing office floorspace vacant in January 2024.
- 4.3 The South West Hertfordshire Economic Study (Hatch, 2024) confirms that there is currently 124,000sq.m of vacant office floorspace across the sub-region (equivalent to a vacancy rate of 11.2%). As of July 2023, 162,000sq.m of office space was available, the majority of which was vacant. The Study also notes that a large number of leases have not been renewed since the COVID-19 pandemic, reflecting structural changes in working practices and demand.
- 4.4 Crucially, the South West Hertfordshire Economic Study concludes that while demand for smaller, modern, high-quality offices in key locations such as central Watford and St Albans is expected to increase, demand for large, outdated office buildings will continue to decline (including in St Albans). The Study recommends that local authorities consolidate surplus office floorspace and encourage redevelopment of vacant and outdated offices to meet alternative needs, including housing.
- 4.5 The evidence base therefore clearly points to an oversupply of office floorspace across the FEMA and District more specifically.
- 4.6 Despite the conclusive evidence presented in the South West Hertfordshire Economic Study and the 2024 AMR, the Draft Local Plan adopts a strategy for the retention and protection of existing employment floorspace across the district, with a blanket restriction on the net loss of any office floorspace within Principal Office Locations, including St Albans City Centre.
- 4.7 This blanket restriction on the loss of any existing office floorspace in Principal Office Locations is directly at odds with the evidence base that underpins the Draft Local Plan, which concludes there is limited demand for large outdated offices and advocates consolidation of existing employment floorspace and the reuse / redevelopment of existing outdated and vacant office buildings to meet other pressing development needs, notably residential development.
- 4.8 In this context, it is contended that the economic strategy at the heart of the Draft Local Plan does not reflect proportionate evidence and cannot be considered sound.

Issue 2 – Protected Employment Areas and Principal Office Locations

Q1: Is the safeguarding of Protected Employment Areas and Principal Office Locations, including the extent of their boundaries, justified? What evidence is there to support Policy EMP1?

- 4.9 It is strongly contended that the safeguarding of Principal Office Locations, including the St Albans City Core Principal Office Location, which underpins the Council's strategic approach to employment land (Policy SP5) in the Draft Local Plan is not supported by evidence and is therefore not justified.
- 4.10 As set out in our response to Matter 5, Issue 1, Question 1, the evidence base that underpins the Draft Local Plan demonstrates a significant oversupply of office accommodation across the South West Hertfordshire FEMA and St Albans more specifically. The evidence base also concludes that there is a specific oversupply of outdated and large office buildings, even within St Albans City Centre.
- 4.11 It is therefore contended that the extent of the St Albans City Core Principal Office Location which includes a significant number of outdated and vacant office buildings, including Marlborough House, is not supported by the evidence base.
- 4.12 As a result, the extent of the St Albans City Core Principal Office Location, coupled with the blanket restriction on the net loss of employment floorspace within the St Albans City Core Principal Office Location (and other protected employment locations) at Policy EMP1 of the Draft Local Plan is not supported by evidence.
- 4.13 To the contrary, the evidence base that underpins the Draft Local Plan advocates the consolidation of existing office floorspace, specifically referencing a strong declining in demand for large office buildings. As such, even though the St Albans City Core Principal Office Location is likely to be the most attractive location for future office demand, this demand is focused on high quality smaller office premises that meet the demands of occupiers.
- 4.14 By failing to distinguish between high-quality, well-located offices and outdated, unviable stock (such as Marlborough House), the Draft Local Plan ignores market realities. The blanket approach to the protection of office floorspace is therefore overly restrictive and risks perpetuating vacancy and underutilisation.
- 4.15 To be sound, the employment strategy set out within the Draft Local Plan should recognise the oversupply of outdated large office stock and provide flexibility for its release, support consolidation of surplus employment land to facilitate viable investment in modern office accommodation, and enable housing delivery in sustainable, accessible locations such as Marlborough House.
- 4.16 Without these adjustments, the Plan risks failing to meet housing needs and to support a sustainable, evidence-led economic strategy.

Q2: As part of the Plan's preparation, was consideration given to whether existing office, industrial or storage and distribution uses could be used for alternative uses, such as housing?

- 4.17 No consideration has been given to the reuse of existing employment locations for alternative uses, such as housing, despite the evidence base demonstrating a significant oversupply of office accommodation and significant demand for housing across the district.
- 4.18 The Draft Local Plan therefore does not adequately consider the potential for existing office, industrial or storage/distribution land to be reused for alternative uses, including residential. It is strongly contended that sites such as Marlborough House, would be well placed to be used for alternative uses, namely residential development.
- 4.19 This omission demonstrates that the Council has not meaningfully considered the potential of underutilised employment land to address acute housing needs, contrary to the requirements of paragraph 126 of the NPPF, which supports the reuse of employment land for housing where appropriate.

Q3: Are the requirements of Policies EMP1 and EMP3 positively prepared and sufficiently flexible enough to account for changing circumstances over the plan period?

- 4.20 Policies EMP1 and EMP3 of the Draft Local Plan are not positively prepared, nor are they sufficiently flexible to respond to changing circumstances.
- 4.21 Paragraph 86 of the NPPF requires planning policies to be flexible enough to accommodate needs not anticipated in the plan period, and to allow for new and flexible working practices. Equally, paragraphs 126 and 127 of the NPPF requires local authorities to support housing development on employment land where consistent with wider policies and where it does not undermine key economic sectors.
- 4.22 The Draft Local Plan does not provide this flexibility. Instead, its blanket restriction on the loss of office space within Protected Employment Areas and the St Albans City Principal Office Locations frustrates both the delivery of modern high-quality offices and the efficient reuse of outdated, vacant employment sites to meet other pressing development needs. This approach is inconsistent with national policy and does not reflect the Council's own evidence base.
- 4.23 Furthermore, the restrictive wording of these policies does not provide any scope for planning decision to respond to a change in market conditions (or current market conditions exacerbating) across the whole of the Draft Local Plan period up to 2040.
- 4.24 It is therefore on this basis that, with significant amendments to both the extent of the protected employment locations and the flexibility afforded to appropriate alternative uses where these are supported by evidence, Policies EMP1 and EMP3 of the Draft Local Plan are unsound.

Issue 3 – Reuse of Employment Land and Buildings

Q1: Is the Plan sufficiently clear, and thus effective, on how development proposals for the reuse of existing employment land and buildings will be considered?

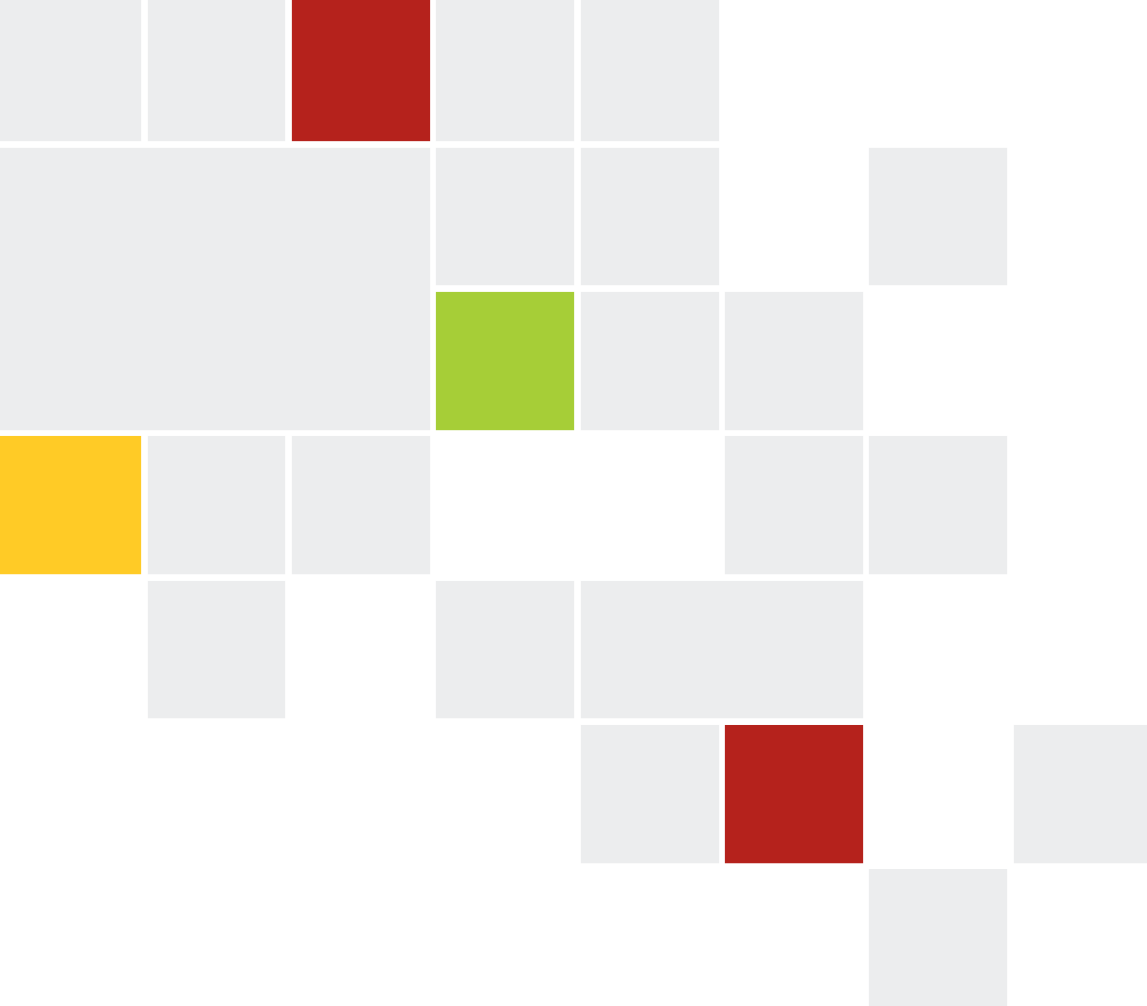
- 4.25 The Draft Local Plan is not sufficiently clear or effective in this regard. The restrictive approach to employment land protections will prevent the effective reuse of underutilised and vacant employment sites.
- 4.26 As demonstrated at Marlborough House, significant amounts of outdated office stock remain vacant due to a lack of demand and viability issues. The current highly restrictive policy wording would prevent such sites being repurposed for alternative uses, including much-needed housing.
- 4.27 Overall, the Draft Local Plan is not effective as it will fail to facilitate delivery of housing on suitable previously developed land. The Draft Local Plan is also not justified as it does not reflect the Council's own evidence, which supports consolidation and redevelopment of surplus office floorspace. Furthermore, the Draft Local Plan conflicts with paragraphs 86 and 126-127 of the NPPF, which require flexibility and support for housing development on employment land where appropriate. Therefore, the Draft Local Plan is unsound.
- 4.28 To be sound, the Draft Local Plan must be amended to remove the blanket protection applied to employment land and buildings, particularly large, outdated offices. Policies EMP1 and EMP3 of the Draft Local Plan should be revised to provide flexibility for release where there is no reasonable prospect of continued employment use and where alternative uses, such as housing, can meet other pressing needs. This approach would be consistent with the approach commonly adopted in other Local Plans across the country, ensuring the Draft Local Plan reflects established and accepted practice.

5. CONCLUSION

- 5.1 TTG contend that the Draft Local Plan is unsound in respect of its approach towards identifying sites for residential allocation, housing mix and density, affordable housing, and employment land.
- 5.2 In relation to Matter 3 (Green Belt), the Council has not demonstrated that it has made as much use as possible of suitable brownfield sites and underutilised land, contrary to paragraph 146 of the NPPF. The site selection process has been inconsistent and incomplete, with available and promoted brownfield sites, such as Marlborough House, excluded without justification. Instead, the Draft Local Plan relies disproportionately on extensive Green Belt release, accounting for 65% of allocations, which is inconsistent with national policy requirements and undermines the objective of sustainable development.
- 5.3 Under Matter 4 (Type and Mix of Housing), the Draft Local Plan fails to embed sufficient flexibility into key policies to adapt to changing needs over the plan period. Policy HOU1 is overly rigid, relying on dated evidence and not allowing for variations in site typologies, viability, or evolving demographics. Similarly, Policy DES3 is inconsistent with national policy requirements to optimise the efficient use of land. The approach to affordable housing is undermined by the inclusion of a late-stage viability review mechanism which is neither justified by evidence nor capable of delivering additional affordable homes in practice. Policy HOU4, dealing with accessible and adaptable housing, is not supported by clear evidence and introduces unnecessary complexity by applying differential requirements across tenures.
- 5.4 Turning to Matter 5 (Economy and Employment), the Draft Local Plan's economic strategy is not based on proportionate or up-to-date evidence. The Authority Monitoring Report (2024) and the South West Hertfordshire Economic Study (2024) confirm that there is a significant oversupply of large, outdated office stock, with demand limited to smaller, high-quality modern office space. Despite this, Policies EMP1 and EMP3 of the Draft Local Plan impose a blanket restriction on the loss of office floorspace in Principal Office Locations and Protected Employment Areas. This approach is inconsistent with the Council's own evidence base, fails to respond to structural changes in demand, and conflicts with national policy, in particular paragraphs 86 and 126-127 of the NPPF, which require flexibility and support for the reuse of employment land for housing where appropriate.
- 5.5 Marlborough House can be taken as an example of a large, vacant, and unsuitable office building that could make a valuable contribution to meeting housing needs in a sustainable location, yet it is constrained by the Draft Local Plan's restrictive employment policies.
- 5.6 Taken together, the Draft Local Plan has not been positively prepared, as it does not provide a strategy that meets objectively assessed housing and employment needs in a sustainable manner. The Draft Local Plan is not justified as it relies on Green Belt release while ignoring viable brownfield opportunities. It is not effective, as restrictive policies will prevent the delivery of both housing and modern employment floorspace. Finally, it is not consistent with national

policy, as it conflicts with the requirements of the NPPF relating to the Green Belt, the efficient use of land, affordable housing delivery, and flexibility in employment land policies.

- 5.7 To be found sound, TTG assert that the Draft Local Plan requires significant modification. This includes embedding flexibility in housing mix policies to reflect changing needs and site-specific circumstances, replacing the late-stage affordable housing viability review with an early-stage mechanism, applying consistent accessible housing standards across all tenures, revising employment policies to allow the release and redevelopment of surplus and outdated office floorspace where there is no reasonable prospect of its continued use, and ensuring a genuine brownfield-first approach to site selection, supported by a transparent methodology and full consideration of all promoted sites including Marlborough House. Without such modifications, the Draft Local Plan will remain unsound and incapable of delivering the sustainable growth that St Albans requires.
- 5.8 We trust that our comments are of assistance and that the Inspectors will be give due consideration to the recommendations that have been made.



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