

Examination of the St Albans City and District Local Plan Matters, Issues and Questions for Stage 2

Statement on behalf of the owners of land at Noke Side

(Representor ID – 153)

Matter 7 – Issue 8 – Chiswell Green Site Allocations

Policy L3 – East and West of Miriam Lane

DLA Ref: 96/044

October 2025

Introduction

1. This statement is submitted on behalf of the owners of land at Noke Side, Chiswell Green ('the Site'), which lies adjacent to the proposed allocation L3 – East and west of Miriam Lane. Representations have been made to Regulation 18 and Regulation 19 draft Local Plan Consultations promoting the allocation of the Site for residential purposes.
2. This statement provides a response to the Inspectors' questions Q2 and Q4, raised in respect of Policy L3 (East and west of Miriam Lane) under Matter 7 (residential site allocations) and Issue 8 (Chiswell Green site allocations).

Summary

3. While the owners of land at Noke Side have no objection in principle to site L3, the resulting Green Belt boundary is not sound and does not meet the NPPF requirements in paragraph 148e) in that the boundary will almost certainly need to be reviewed at the end of the Plan period.

Question 2 – Green Belt boundary alterations?

4. The Inspectors ask at **Question 2**: “What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?”
5. The geographical context for site L3 is crucial. Appendix One to this statement shows an extract of the Council’s policies map annotated with the extent of site L3, the Land at Noke Side and the CALA Homes development that benefits from an outline planning permission and with a reserved matters application pending.
6. Appendix Two to this statement shows the illustrative layout from outline application ref 5/24/2293 in the context of site L3 and the CALA Homes development. The outline application ref 5/24/2293 is due to be reported to committee in the next few months.
7. Paragraph 148e) of the relevant NPPF requires that the Local Plan should *“be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period”*.
8. By the end of the Plan period, development will have taken place on the CALA Homes site and development will have also taken place on the L3 allocation (assuming the Inspectors find it sound). On this basis, the retention in the Green Belt of the land rear of Noke Side in between these two major developments makes no sense. It would serve no Green Belt purpose whatsoever. The Local Plan as currently drafted cannot meet the requirement in para 148e).
9. If the land rear of Noke Side were allocated for housing and removed from the Green Belt, it could facilitate a far more cohesive form of development across the three sites. Walking and cycling links could be opened up and this side of Chiswell Green could function more effectively.
10. Both the CALA Homes site and the land rear of Noke Side should be recognised as having development potential and should be removed from the Green Belt and allocated for housing. Miriam Lane would form an obvious alternative Green Belt boundary to the rear.

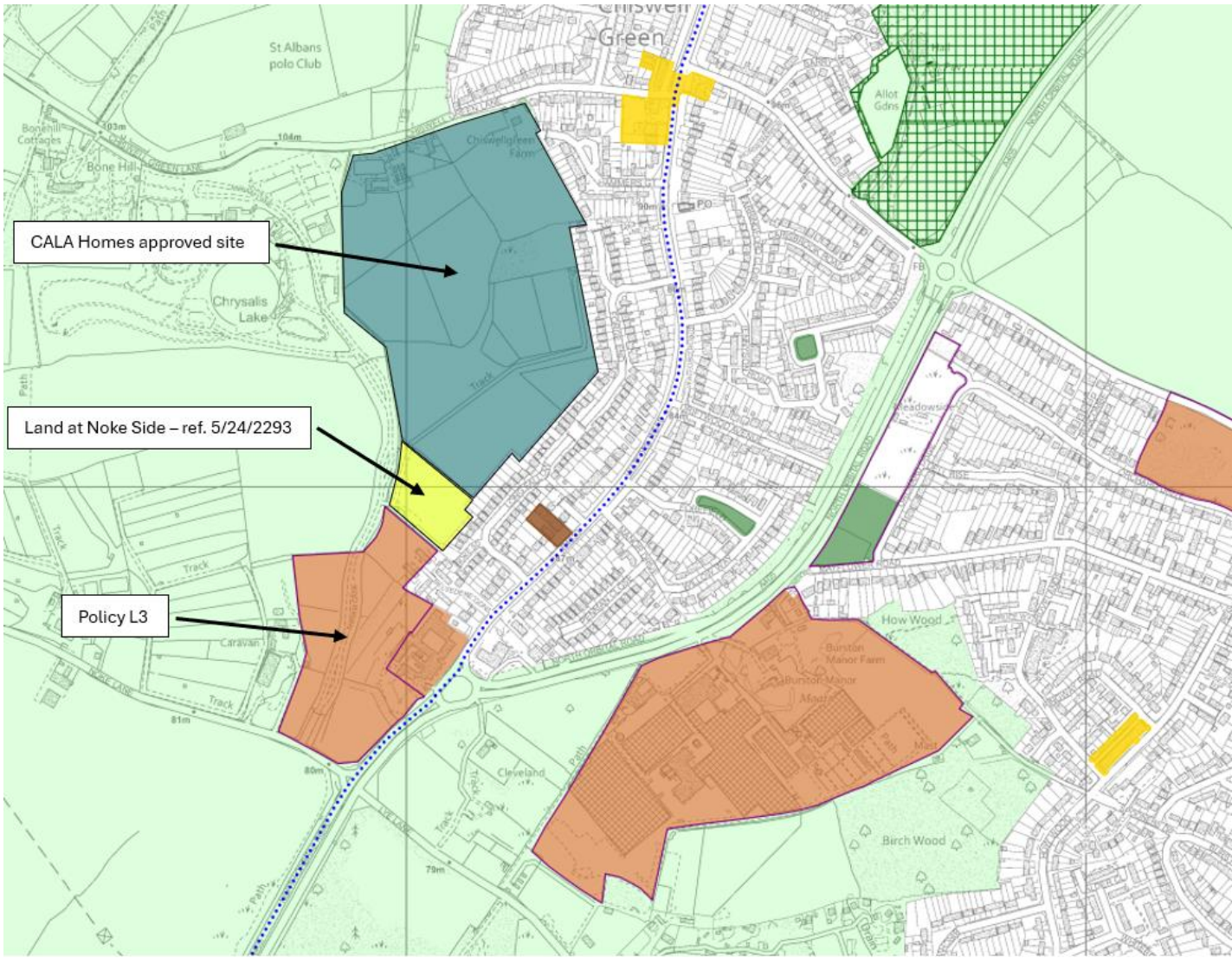
Question 3 – exceptional circumstances

13. The Inspectors ask at **Question 3**: *“Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?”*
14. The exceptional circumstances to release Green Belt land across the district have been well rehearsed. Exceptional circumstances exist to release site L3 from the Green Belt. However, exceptional circumstances also apply to the land rear of Noke Side and to the CALA Homes site. In order to create a sensible long-term Green Belt boundary, and to satisfy paragraph 148e) of the NPPF, Miriam Lane should form the new Green Belt boundary.

Question 4 – soundness of Policy M15

15. The Inspectors ask at **Question 4**: *“Is Policy L3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?”*
16. While we have no objection to site L3 in principle, the retention of the adjoining land within the Green Belt is not sound on the basis that it does not comply with paragraph 148e) of the NPPF. Miriam Lane should form the new Green Belt boundary and the land rear of Noke Side, along with the CALA Homes development, should be allocated for housing.

Appendix One: Annotated policies map extract



Appendix Two: Annotated illustrative masterplan – land at Noke Side (ref 5/2024/2293)



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