



KEEP CHISWELL GREEN

ST ALBANS CITY AND DISTRICT COUNCIL

LOCAL PLAN EXAMINATION

Stage 1

Hearing Statement

by

Keep Chiswell Green



April 2025

Matter 1 – Legal Compliance

Issue 1 – Duty to Cooperate

Q1 – Q4 – Housing Need and Cross-Boundary Cooperation

1. While St Albans City and District Council (SADC) asserts that there is no identified unmet housing need in the South-West Hertfordshire Housing Market Area, The Council's own Sustainability Appraisal appears to contradict this and states that unmet housing need is anticipated in neighbouring authorities, particularly Three Rivers and Hertsmere.
2. SADC submits that the Statements of Common Ground demonstrate that it has met its legal duty to cooperate, but substantive cross-boundary decisions appear to be deferred to the South West Herts Joint Strategic Plan which is still in development.
3. The NPPF (para 35) states that a plan is effective if it is based on joint working on cross-boundary strategic matters that have been "*dealt with rather than deferred*".
4. Our District needs a solid Plan with clearly defined parameters, not promises of future cooperation that allow developers to mould the Plan into what suits them and to exploit any uncertainties.
5. Keep Chiswell Green (KCG) would like to see the issue of potential unmet housing need, in our own District and in our neighbours', clarified and resolved before a local plan for our District can be adopted, particularly in light of the significant pressures on South West Hertfordshire and with sensitive consideration for the constraints in the area.

Issue 2 – Public Consultation

Q1 – Q2 – Compliance with the Consultation process

6. KCG strongly believes that the Regulation 18 public consultation has not met the standards set out in the NPPF or in the PPG, and which residents have the right to expect.
7. With little publicity, the Regulation 18 consultation ran primarily during the summer holidays at a time when many residents were away or less able to engage with the process. Appeals to reschedule the consultation were rejected.
8. Many residents told us that they were unable to access the consultation due to issues with having to create a new account on the Council's portal which did not integrate with their other Council accounts. The documentation was too lengthy and complex to be readily accessible and the format for responses was too restrictive which caused many residents to quit the process without making any comment.

9. Unsurprisingly then, the response rate was very low, with fewer than 2,000 comments received from across the District. To put this into context, a number of individual planning applications in the District have each attracted over 1,500 objections.
10. Equally, neighbouring Dacorum Borough Council “received over 16,000 comments from over 4,000 people” in response to their Regulation 18 Consultation in 2020, while Hertsmere Borough Council received nearly 18,000 in response to their consultation in 2022. This makes the fewer than 2,000 comments from the St Albans District all the more notable.
11. The fact that many comments from residents received a response of “noted”, and that there have been no meaningful changes between the Regulation 18 and Regulation 19 versions of the Plan, despite the number of concerns raised, undermines public confidence in the consultation process, and in the Plan itself. Many residents consider that the Regulation 18 consultation was just a formality, a tick-box exercise, not a genuine opportunity to have their views taken into consideration and to influence the Plan.
12. Comparatively, Dacorum Borough Council has reacted positively and constructively to the responses to their consultation; their Local Plan Consultation page (<https://letstalk.dacorum.gov.uk/hub-page/localplan2023> - accessed 15/4/25) states :

“ We are now proposing to make changes to the strategy we consulted on in 2020, that we hope address the key issues raised by the community during that exercise. These changes include:
 - *Reducing the levels of housing growth, considering our unique constraints and pressures on infrastructure;*
 - *Ensuring growth is more proportionate for our market towns;*
 - *Maximising urban capacity in sustainable locations; and*
 - *Exploring further opportunities for regenerating Hemel Hempstead's employment and retail areas.*
13. Hertsmere Borough Council has reacted to the responses to their public consultation in 2021 to the extent that they have produced 2 further iterations of their draft Plan and consulted on the changes in 2022 and again in 2024.
14. KCG would like to see feedback from local residents, and particularly from local parishes, groups and organisations, incorporated into the Local Plan so that it reflects the wishes of the local population for the area they call home.

Issue 3 – Sustainability Appraisal

Q1 – Q6 – Reasonable Alternatives and Assessment Process

15. The NPPF 2023 (para 11) stresses the need to :
 - Align growth and infrastructure
 - Mitigate and adapt to climate change

- Improve the environment
 - Promote a sustainable pattern of development
 - Give weight to policies protecting areas or assets of particular importance
16. The Sustainability Appraisal acknowledges paragraph 11 as the key context of the assessment but justifies Green Belt release by citing housing need and “urgent” plan adoption as over-riding factors.
 17. This presents a very narrow interpretation of sustainable development; the environmental and cultural constraints in this District – particularly the Green Belt, historic assets, and the role of tourism in the local economy – are not given even the equivalent weight as housing need. Essentially, housing delivery is prioritised over environmental and heritage protection without a thorough exploration of how these objectives might be more appropriately balanced.
 18. Furthermore, the lack of detail on how to mitigate the impact of the proposed quantum of development on this highly sensitive area and on climate change undermine the compliance of the Plan with NPPF paragraph 11.
 19. The NPPF 2023 and the Environmental Assessment of Plans and Programmes Regulations 2004 both require that Local Plans test reasonable alternative scenarios, particularly where development could affect protected areas such as the Green Belt. However, the Sustainability Appraisal appears only to apply planning judgement and discretion to the scenario selected, not the systematic assessment of reasonable alternatives expected.
 20. SADC says that sites that have been omitted have been dismissed due to “clear cut reasons” but these reasons are not transparently evidenced or benchmarked against the District’s environmental and heritage constraints.
 21. This dismissal of alternative scenarios undermines the Plan’s legal compliance with the NPPF and the SEA Directive’s requirements for a robust assessment of alternatives. In particular, and despite the availability of a number of scenarios provided by the AECOM report commissioned by SADC in preparation for the Plan, the Sustainability Appraisal fails to examine options that may better minimise or avoid harm to the Green Belt, or that might better preserve the District’s heritage and landscape settings.
 22. This lack of comparison of alternative scenarios is particularly harmful to the democratic process of formulation and consultation of the Plan; elected Planning Policy Committee members were expected to have read and analysed hundreds of pages of documents in a matter of days prior to the committee meeting at which they were asked to approve the Plan with no presentation or discussion during the meeting of the AECOM report.
 23. It is highly possible, even likely, that a number of these elected councillors, who are volunteers with other significant responsibilities outside of Council duties, may not

even have been aware that there were alternative scenarios, and voted to approve the Plan in the belief that the scenario put forward in the Plan was the only viable scenario. Four of these alternative scenarios would have avoided further development in the south of the District, but there was no open discussion or debate about which approach might be best for the District.

24. While the Sustainability Appraisal identifies heritage as a sustainability topic and refers to relevant plan objectives, the appraisal of strategic site allocations does not transparently assess the cumulative impacts on the historic environment, particularly for areas near St Albans' Conservation Areas, its Roman and medieval cores, or Scheduled Monuments.
25. The Appraisal acknowledges that there are challenges in predicting the effects of development on sensitive areas, but despite the rich and prevalent archaeological and built heritage across the District, it does not clearly present constraints mapping that evaluates the impacts the proposed development on these heritage assets.
26. Given the prominence of St Albans as a nationally and internationally historic city with tourism and cultural value, the Sustainability Appraisal should have given more emphasis to the need to protect areas or assets of heritage importance and robustly assessed the impact of different development strategies on these assets.
27. The District's Green Belt also has a role in supporting its heritage and tourism; the Green Belt preserves historic settlement patterns, offers landscape settings that enhance the significance of heritage assets (such as Redbournbury Watermill and the Hollybush public house), and contributes to tourism through open spaces, trails, and access to historic sites (such as the Roman Theatre of Verulamium).
28. However, the Sustainability Appraisal treats the Green Belt primarily as a development constraint, overlooking its role in underpinning the District's heritage setting and economic sustainability through tourism. This failure to account for the full role of the Green Belt as it contributes to the setting, meaning and economic viability of historic places, leads to an incomplete and potentially misleading sustainability judgement of its value to the District.
29. The Sustainability Appraisal does briefly acknowledge tourism as part of the local economy and as contributing to local community wellbeing. However, it does not consider how different development scenarios may support or undermine the District's role as a heritage and visitor destination. A sustainable plan needs to be mindful of development in or near historic areas and not diminish them or their landscape settings. It is not clear that this has been considered in the Sustainability Appraisal.
30. As a result, KCG believes that the Sustainability Appraisal is not a fair or transparent assessment of the options – options that residents were not given a chance to understand or respond to. It does not offer a transparent assessment of reasonable alternatives to Green Belt development, or a balanced consideration of the impact of

the proposed development on the environment, the District's heritage assets, or its cultural setting. It appears that the Sustainability Appraisal supports a strategy that had already been decided, that it justifies the strategy, but it is not clear that the strategy offers a sustainable pattern of development as required by the NPPF.

Matter 3 – The Green Belt

Issue 2 - Green Belt Review

Q1 – Q7

31. The 2023 Green Belt Review was presented as evidence to support the Council's proposed changes, but from a community point of view, the process feels like it started with the answer and worked backwards.
32. The Review does not consider wider issues like transport, schools, or flood risk—only how well land performs against the five Green Belt purposes. These issues are important, but only one part of the picture. If a site is weak Green Belt but undeliverable due to infrastructure, it should not still be allocated.
33. Equally, the weighting of Green Belt harm versus the benefits of development are not clear and transparent. We consider that greater weight should be given to landscape, biodiversity, openness, and community use, as well as mental and community well-being.
34. The selection was also influenced by sites on which there were already speculative applications; rather than an impartial assessment of these sites, sites that were subject to speculative applications were added to those considered suitable from the results of the Arup Green Belt Review.
35. It is also unclear how the Review handled the idea of compensatory improvements to Green Belt, as required by paragraph 147 of the NPPF. There's little evidence that these will be delivered, let alone delivered in the same locations where land is being lost.
36. Furthermore, there is no consideration in the site assessments of the impact on agricultural land of removing a given site from the Green Belt. Any proposals to remove sites from the Green Belt, including buffer zones and safeguarded land, must consider the wider impact on surrounding land to be used for agricultural purposes.

Issues 1 and 3 – The Principle of Green Belt Release and Exceptional Circumstances

37. KCG strongly objects to the scale and location of Green Belt release proposed in the draft Local Plan. We believe the Council has not satisfactorily met the tests set out in

national policy such as exploring all options for increasing densities in urban areas, and identifying suitable brownfield sites and underutilised land.

38. Paragraph 146 of the National Planning Policy Framework (NPPF) is clear: exceptional circumstances must exist to justify any changes to Green Belt boundaries, and only after all reasonable options for meeting housing need have been fully explored. That has not happened here.
39. However, a more important consideration is whether the District should even be subject to the Standard Method of calculating housing targets. St Albans is a city of exceptional national and international heritage value. It is home to Roman remains, the medieval Abbey Cathedral, and a historic street layout that defines its unique character. This heritage is a vital part of the city's identity and a major driver of tourism, which supports the local economy and the wider Hertfordshire region.
40. The scale of housing development proposed in the Local Plan which is forcing Green Belt release risks undermining these assets. Key historic views, sensitive landscapes, and the city's distinctive setting are vulnerable to irreversible harm from overdevelopment. The NPPF is clear that heritage assets must be conserved and enhanced, and that development should be appropriate in light of their significance.
41. In addition to its heritage constraints, St Albans' position in the Metropolitan Green Belt restricts the availability of land for large-scale development and plays a key role in protecting the city's historic setting. The city also faces infrastructure pressures—particularly in transport, schools, and health services—which further limit its capacity to absorb high housing growth.
42. Several other historic towns including Bath, York, Chichester, Oxford, and Cambridge have successfully argued for lower housing targets than those calculated by the standard method. In each case, planning authorities demonstrated that heritage, landscape, and infrastructure constraints made higher targets unsustainable or inappropriate. St Albans faces similar, if not greater, limitations but SADC has not been willing to entertain this scenario.
43. Tourism in St Albans depends on preserving the city's visual appeal and historic atmosphere. Increased density and inappropriate infill development risk degrading the very qualities that attract visitors and support local businesses. The Local Plan should protect, not compromise, this economic strength.
44. A lower housing target for St Albans would be consistent with national policy objectives. The NPPF allows for housing numbers to be adjusted in light of local constraints, including the protection of designated heritage assets and the Green Belt. To maintain the city's historical character, cultural significance, and economic sustainability, a more tailored, realistic target is needed.
45. We therefore urge the Inspectors to consider St Albans' unique position as a historic city with limited development capacity. A reduced housing target would allow for growth that is sustainable, locally sensitive, and aligned with the long-term preservation of this nationally important place.

46. Releasing Green Belt land around historically significant areas threatens to undermine the sense of place that makes St Albans so valued—by residents, tourists, and the wider nation. Planning decisions here must recognise that the value of the District goes far beyond housing numbers. Its role in the UK’s cultural and tourism economy should be a key consideration when assessing whether “exceptional circumstances” exist. We submit that they do not.

Conclusion

47. We ask the Inspectors to look closely at whether this Plan genuinely meets the tests for Green Belt release. From the perspective of local residents, it does not. The Council argues that housing need justifies exceptional circumstances but that argument is not enough on its own. The process has been rushed, top-down, and overly focused on numbers instead of places. The result is a Plan that is neither fair nor fit for purpose.
48. In our case, the southern part of the District—and Chiswell Green in particular—has been disproportionately targeted. We have already seen massive speculative growth. The Local Plan adds to that pressure, with no clear vision for how infrastructure will cope or how the Green Belt will be protected in future.
49. St Albans District should not be treated as just another commuter location to absorb unmet housing targets. It is a nationally important historic and cultural landscape. Protecting its Green Belt is not just a local issue—it is a matter of national heritage and public interest.
50. Exceptional circumstances should mean exactly that—**exceptional**. They should involve a careful balancing of all factors, including harm to the environment, pressure on infrastructure, and fairness to different parts of the District.
51. Crucially, in a district like St Albans - rich in historical significance and environmental character - Green Belt land plays a key role in preserving the setting and integrity of its heritage assets. If we begin to erode that protection now, we risk impacting the ability of future generations to be self-sustaining.
52. We are not opposed to new homes. We want a good, sound Local Plan that gives communities certainty. But the current Plan does not deliver that. It threatens to sacrifice valued Green Belt land without a proper, justified process.
53. We urge the Inspectors to recommend major changes before this Plan can be considered sound.

Thank you for your attention

Keep Chiswell **Green**

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