

ST ALBANS CITY AND DISTRICT COUNCIL LOCAL PLAN EXAMINATION Stage 2

Hearing Statement Site allocation L3 Land to the East and West of Miriam Lane Chiswell Green



Response by Shirani St Ledger McCarthy

For the supporters of

Keep Chiswell Green

Site allocation L3

Land East and West of Miriam Lane

Chiswell Green AL2 3NY

Introduction

This statement is submitted on behalf of Keep Chiswell Green in respect of site allocation L3.
 It addresses the soundness of including land to the west of Miriam Lane within the proposed allocation and argues that the allocation should be limited to the Noke Hotel site and the land east of Miriam Lane only.

Site context

- 2. Site allocation L3 combines three distinct plots:
 - a. The Noke Hotel a hotel and local landmark first established in 1790 situated at the Noke roundabout on the A405 at the entrance to St Albans
 - b. Land east of Miriam Lane a small plot of Green Belt land situated immediately behind the Noke Hotel, linking the site of the hotel to the "Noke Side" site on which there is currently a speculative planning application for 27 residential dwellings
 - c. Land west of Miriam Lane a small Green Belt plot separated from the rest of the site by Miriam Lane
- 3. Miriam Lane is a well-constructed private road, originally built to serve the former Butterfly World attraction, and now used by a range of vehicles, including HGVs.
- 4. The wider Green Belt parcel containing these sites lies within a Class 1 Network Enhancement Zone and a Source Protection Zone 1 (Bedrock Aquifer). It is therefore a parcel with high environmental sensitivity and strategic importance for landscape connectivity and for groundwater protection.



5. The land between Miriam Lane and the current settlement boundary to the east also includes the Land South of Chiswell Green Lane site which has permission for 391 new units.



Assessment

- 6. The Noke Hotel is clearly previously developed land. Although there are areas of green space within its curtilage, the overall character and use of the site is urban and we do not contest its redevelopment. However, given that planning permissions have now been granted for 1,127 residential units in Chiswell Green, including 190 at Copsewood on the opposite side of the roundabout to the Noke Hotel, we consider that a replacement hotel would be of greater benefit to the community than further housing.
- 7. The small plot east of Miriam Lane can be understood to be a limited infill between the existing hotel and a large number of new residential units to the north. Limiting the allocation site to this point would establish Miriam Lane as the new outer edge of the settlement of Chiswell Green and a logical and defensible Green Belt boundary.



- 8. The small plot west of Miriam Lane, however, sits clearly beyond that boundary. We assert that it would represent an unnecessary and harmful encroachment into the open countryside. Including it within the L3 site allocation would breach the Miriam Lane boundary and leave no next natural stopping point for further encroachment until Noke Lane has been reached to the west. This would be contrary to the NPPF (2024) paragraph 142 which states that "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open", and the inclusion of this plot in the site allocation would therefore be inconsistent with national policy.
- 9. Excluding the land west of Miriam Lane from the L3 allocation would not preclude any future application being decided on its own merits, but it would define Miriam Lane as the defensible Green Belt boundary, helping to resist the steady loss of open land in this part of Chiswell Green, and halting the destruction of the separation between Chiswell Green (and therefore St Albans) and Leverstock Green (and therefore Hemel Hempstead).
- 10. We consider that the allocation in its proposed form is not justified as no exceptional circumstances have been demonstrated to necessitate the release of the plot west of Miriam Lane from the Green Belt, particularly when significant housing land supply has already been provided through nearby permission.
- 11. Given its environmental designations (Class 1 NEZ and SPZ1 Bedrock Aquifer), development of the west of Miriam Lane plot would also conflict with the Local Plan's own strategic objectives for biodiversity net gain, green infrastructure protection, and water resource safeguarding.

Conclusion

12. We therefore strongly object to the inclusion of the land to the west of Miriam Lane within the L3 site allocation.



- 13. Recognising Miriam Lane as the new Green Belt boundary provides a clear, visible, logical and defensible limit to further development, consistent with Green Belt policy and the principles of sustainable settlement planning.
- 14. It would maintain protection for a highly sensitive Green Belt parcel, avoid unnecessary sprawl in an area already accommodating substantial housing development, and would better align with other policies in the Local Plan, with national Green Belt policy, and with the tests of soundness for the Plan.
- 15. We therefore assert that allocation L3 should comprise only the Noke Hotel site and the land to the east of Miriam Lane.

Thank you for your attention

Shirani St Ledger McCarthy

For the supporters of Keep Chiswell Green

17th October 2025

