

## Matter 7 – Residential Site Allocations

### Issue 8 – Chiswell Green Site Allocations

#### Policy L3 - East and West of Miriam Lane

#### **Q1 What is the current use of the site and is it available for development within the plan period?**

- 1.1 The site currently consists of a hotel (currently in use as temporary accommodation), a car park, and undeveloped land.
- 1.2 An outline planning application for *demolition of the existing buildings and structures and the phased development of residential dwellings (Use Class C3) and a residential care home (Use Class C2) with associated landscaping, parking and ancillary works* was submitted on 16/07/2025 and is currently under consideration. The application is for 166 C3 units and a 96 bedroom residential care home. There had been a pre-application process in 2025 as well. Therefore, SADC considers that the site is available for development within the plan period.

#### **Q2 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?**

##### What is the justification for the proposed alteration to the Green Belt boundary?

- 2.1 The primary justification is the need to deliver the housing requirements set out in the Plan, which is seeking to meet the 'Standard Method' for housing in full. There is also the need to deliver a range of other associated infrastructure and community facilities.

##### 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?

- 2.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

*148. When defining Green Belt boundaries, plans should:*

*...*

*e) be able to demonstrate that Green Belt boundaries will not need to be altered at*

*the end of the plan period; and*

*f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

- 2.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3.

- 2.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For this site, relating to sub-area 134, they were:

*Consideration of Boundaries*

*Commentary on boundary features and impact on Green Belt boundary strength*

*The outer boundary to the south is readily recognisable and likely to be permanent. The inner boundary and outer boundary to the west are predominantly readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.*

*Categorisation & Recommendation*

*Sub-area category & recommendation*

*The sub-area performs weakly against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration as RA-47, or in combination with SA-135 and SA-136 as RC-10.*

- 2.5 Also for this site, potential Green Belt boundaries were considered in GB 02.03 relating to sub-area 135, they were:

*Consideration of Boundaries*

*Commentary on boundary features and impact on Green Belt boundary strength*

*If the sub-area was released, it would result in the creation of new Green Belt boundaries. These boundaries would be predominantly readily recognisable but not necessarily permanent and would not meet the NPPF definition. The new boundaries would require strengthening.*

*Categorisation & Recommendation*

*Sub-area category & recommendation*

*The sub-area performs moderately against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in combination with*

SA-134 and SA-136 only as RC-10.

- 2.6 Also for this site, potential Green Belt boundaries were considered in GB 02.03 relating to sub-area 136, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

*The inner and outer boundaries are predominantly readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.*

Categorisation & Recommendation

Sub-area category & recommendation

*The sub-area performs weakly against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in combination with SA-134 and SA-135 only as RC-10.*

- 2.7 There are effectively three new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – well-established hedgerows

Western boundary – well-established hedgerow and unclassified private road

Southern boundary – Noke Lane

N.B. Part of the site allocation to the east already forms part of the Chiswell Green Tier 5 Settlement area.

- 2.8 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

**Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?**

- 3.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 3.2 The strategic case to amend Green Belt boundaries is set out in answer to Stage 1 Matter 3, Issue 3, Question 1 and as addressed in GB 01.01 Green Belt and Exceptional Circumstances – Evidence Paper (2024) which sets out in paragraph 7.2 that:

*The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:*

- The acuteness/intensity of the housing need.*
- The inherent constraints on supply/availability of non-Green Belt land.*
- The difficulties of delivering sustainable development without impinging on the Green Belt.*
- The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.*
- The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*

3.3 The evidence paper goes on to say in paragraph 7.3 that:

*The Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and primarily employment land.*

3.4 In relation to the specific case in this location, East and West of Miriam Lane, Chiswell Green, AL2 3NY, the specific localised Green Belt impacts are well understood because of the findings GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). The Green Belt Review assessment of this site is comprised of multiple sub-area proforma assessments in this location. GB 02.03 on pages 600 to 603, relating to sub-area 134, states:

#### *Purpose Assessment*

##### *Summary*

*The sub-area performs weakly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or 4; and performs weakly against purposes 2 and 3.*

#### *Wider Green Belt Impacts*

##### *Summary*

*Overall, the sub-area does not play an important role with respect to the strategic land parcel and if released in isolation or in combination with SA-135 and SA-136, is unlikely to significantly harm the performance of the wider Green Belt.*

#### *Sub-area category & recommendation*

*The sub-area performs weakly against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration as RA-47, or in combination with SA-135 and SA-136 as RC-10.*

- 3.5 GB 02.03 on pages 604 to 607, relating to sub-area 135, states:

Purpose Assessment

Summary

*The sub-area performs moderately against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or 4; and performs weakly against purpose 2, and moderately against purpose 3.*

Wider Green Belt Impacts

Summary

*Overall, the sub-area does not play an important role with respect to the strategic land parcel and if released in combination with SA-134 and SA-136, is unlikely to significantly harm the performance of the wider Green Belt*

Sub-area category & recommendation

*The sub-area performs moderately against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in combination with SA-134 and SA-136 only as RC-10.*

- 3.6 GB 02.03 on pages 608 to 611, relating to sub-area 136, states:

Purpose Assessment

Summary

*The sub-area performs weakly against the purposes overall. The sub-area does not meet purpose 1 criteria (a), 2 or 4 and performs weakly against purpose 3.*

Wider Green Belt Impacts

Summary

*Overall, the sub-area does not play an important role with respect to the strategic land parcel and if released in combination with SA-134 and SA-135, is unlikely to significantly harm the performance of the wider Green Belt.*

Sub-area category & recommendation

*The sub-area performs weakly against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in combination with SA-134 and SA-135 only as RC-10.*

- 3.7 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out on pages 7 to 8 in LPSS 02.05 - Green Belt Sites Recommended Large Site Proformas (2024). This is set out in particular in the Qualitative Assessment:

*The site is recommended for further consideration by the Green Belt Review Stage 2 Report.*

...

*This site is recommended to progress.*

- 3.8 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.
- 3.9 N.B. There is a pending outline planning application for 166 dwellings plus a 96-bed care home.

**Q4 Is Policy L3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?**

- 4.1 Yes, it is considered that Policy L3 is justified, effective and consistent with national planning policy.
- 4.2 As answered above in Policy L3 M7I8Q3, Policy L3 is considered to be justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024).
- 4.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy L3 M7I8Q3 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 4.4 As set out in Policy L3 M7I8Q3 above, the Site Selection process set out in LPSS 02.05 - Green Belt Sites Recommended Large Site Proformas (2024) assessed site L3 for potential allocation in the Plan and recommended the site to progress.
- 4.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site L3 for allocation, which states at paragraph 5.4.136:

5.4.136

...

*• East and West of Miriam Lane, Chiswell Green – is located near-adjacent to the south of the aforementioned site for 391 homes to the west of Chiswell Green that was recently granted planning permission by the Secretary of State. The site was proposed for 98 homes in 2023, but the site has now been expanded to include the Noke Hotel adjacent to the east, and the new capacity is 122 homes.*

*The new proposed approach is supported, in light of the following statement from the ISA Report (2023): “[Development] could provide an opportunity to rationalise the*

*settlement edge in this location, which is currently associated with a light industrial area, a hotel and a private road (formerly access to Butterfly World, which closed in 2015), and also mindful of the nearby Burston Nurseries site. However, the eastern half of the site comprises a blanket TPO.”*

- 4.6 Policy L3 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
  - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
  - SADC/ED23 - Statement of Common Ground between SADC and Historic England
  - SADC/ED24 - Statement of Common Ground between SADC and Natural England
- 4.7 Policy L3 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01 the Sustainability Appraisal.
- 4.8 Overall, Policy L3 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 4.9 N.B. Policy L3 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

#### Policy U4 – Greenwood United Reformed Church

#### **Q1 What is the existing use of the site and is it developable within the plan period?**

- 1.1 The existing use of the site is the Greenwood United Reformed Church, which sits in substantial grounds.
- 1.2 The site was put forward in March 2021 by the Greenwood United Reformed Church themselves as being developable within the plan period.
- 1.3 The capacity of the site has been reduced to reflect the requirement in Key development requirement no.1 that:

*Proposals must retain a community facility with at least the same floorspace.*

- 1.4 The Transport Impact Assessment for the site, Transport Impact Assessment Appendix 1 St Stephen (2024) (INF 09.08) says about the access strategy for the site:

*The site has direct access onto Watford Road. The private road that connects the site to Watford Road is narrow and proposals must demonstrate adequate access and egress for pedestrians, cyclists and vehicles. There is a reasonable prospect that a Local Transport Plan (LTP) compliant access strategy allowing safe access for all modes is deliverable.*

- 1.5 SADC, therefore, considers that the site is developable within the plan period.

## **Q2 Is Policy U4 justified, effective and consistent with national planning policy?**

- 2.1 Yes, it is considered that Policy U4 sites is justified, effective and consistent with national planning policy.
- 2.2 The site allocation is justified because it follows the submitted Plan's spatial strategy which locates growth to make the most sustainable use of land in urban areas and develop brownfield land. The site is in the settlement of Chiswell Green which is a Tier 5 Settlement in the submitted Local Plan Settlement Hierarchy. Table 1.3 – Settlement Hierarchy in LPCD 02.01 - Reg 19 Local Plan Part A (2024) on page 10 sets out:

### **Tier 5**

#### **Medium Sized Village**

*Smaller population size compared to the Large Villages Provision of key services  
Functional relationship with St Albans and Watford for high order services  
Availability of bus routes and rail branch line to provide transport offer*

- 2.3 Policy U4 is effective as it is developable over the plan period. The site progressed to site selection as it was indicated as being available for development over the plan period by the landowner.
- 2.4 Policy U4 is consistent with national planning policy as it enables the delivery of sustainable development in accordance with policies in the NPPF December 2023. The relevant policies for sustainable development which applies are:

## **11. Making effective use of land**

*123. ... Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.*

*124. Planning policies and decisions should: ... c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).*

*125. Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.*

- 2.5 N.B. Policy U4 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.
- 2.6 Relevant evidence for site availability, suitability and deliverability is set out in the table below:

**Table 1 - Evidence of Site Availability, Suitability and Deliverability for Policy U4 – Greenwood United Reformed Church**

| <b>Tenure</b> | <b>Site Availability</b>                                                                                                                                                                                                                                                                                                                                 | <b>Site Suitability</b> (Extracted from LPSS 02.14 - Urban Sites Recommended Urban HELAA Proformas (2024))                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Site Deliverability</b> (Details of site work to actively progress the site)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Years Deliverable/ Developable</b> |
|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Private       | <p>HELAA ref STS-23-21, HELAA 04.15 - Annex 15 St Stephen (2021) availability conclusions (page 108) sets out:</p> <p>... The site has been put forward through the 'call for sites' process, indicating it is available. Currently no known legal or land ownership issues are associated with the site preventing development from coming forward.</p> | <p>Page 7: <b>Qualitative Assessment ...</b> <i>The site is in Chiswell Green, a Tier 5 Settlement in the Settlement Hierarchy. The site is approximately; 370 metres from a primary school, 1.8 kilometres from a secondary school, 40 metres from a bus stop, 3.6 kilometres from St Albans City mainline railway station and 460 metres from a Local Centre. The site is partially within a 100 metres buffer of a deciduous woodland Priority Habitat, located to the south east of the site. The site contains three individual TPOs. There are numerous mature trees along the site's boundaries. An electrical feature lies adjacent to the site's northern boundary. Potential access is via a single track lane off Watford Road. <b>The site is recommended to progress.</b></i></p> | <p>The site has obtained recent permission for "Demolition and replacement of existing self-contained community/church hall and associated facilities with covered open sided link to existing church, alterations to parking and landscaping, relocation of outbuildings" (ref 5/2023/0867). LPCD 02.02 - Reg 19 Local Plan Part B (2024) sets out the following <b>key development requirements...</b> 1. <i>Proposals must retain a community facility with at least the same floorspace.</i> Therefore, the church is actively moving forward with proposals for redevelopment of the site and the residential element is expected to come forward in due course.</p> | 2031/32                               |

## Policy UC25 – Watford Road, Chiswell Green

### **Q1 What is the existing use of the site and is it developable within the plan period?**

- 1.1 Site UC25 currently consists of a cycle shop and a car showroom.
- 1.2 The site owner confirmed via email in summer 2025 that there is a realistic prospect of delivery of housing at this site commencing in 2030/31. They had previously confirmed that the site was available in August 2022 and March 2023. SADC, therefore, considers that the site is developable within the plan period.

### **Q2 Is Policy UC25 justified, effective and consistent with national planning policy?**

- 2.1 Yes, it is considered that Policy UC25 sites is justified, effective and consistent with national planning policy.
- 2.2 The site allocation is justified because it follows the submitted Plan's spatial strategy which locates growth to make the most sustainable use of land in urban areas and develop brownfield land. The site is in the settlement of Chiswell Green which is a Tier 5 Settlement in the submitted Local Plan Settlement Hierarchy. Table 1.3 – Settlement Hierarchy in LPCD 02.01 - Reg 19 Local Plan Part A (2024) on page 10 sets out:

#### Tier 5

#### Medium Sized Village

*Smaller population size compared to the Large Villages Provision of key services  
Functional relationship with St Albans and Watford for high order services  
Availability of bus routes and rail branch line to provide transport offer*

- 2.3 Policy UC25 is effective as it is developable over the plan period. The site progressed to site selection as it was indicated as being available for development over the plan period by the respective landowner. Correspondence from the landowner has reiterated their position that the site remains available for development within the plan period.
- 2.4 Policy UC25 is consistent with national planning policy as it enables the delivery of sustainable development in accordance with policies in the NPPF December 2023. The relevant policies for sustainable development which applies are:

### **11. Making effective use of land**

*123. ... Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.*

*124. Planning policies and decisions should: ... c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).*

*125. Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.*

- 2.5 Relevant evidence for site availability, suitability and deliverability is set out in the table below:

**Table 2 - Evidence of Site Availability, Suitability and Deliverability for Policy UC25 – 318 Watford Road, Chiswell Green, AL2 3DP**

| <b>Tenure</b> | <b>Site Availability</b>                                        | <b>Site Suitability</b> (Extracted from LPSS 02.15 - Urban Sites Recommended UCS Proformas (2024))                                                                                                                                                                              | <b>Site Deliverability</b> (Details of site work to actively progress the site)                                                                                                                                                                | <b>Years Deliverable/ Developable</b> |
|---------------|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Private       | Landowner has confirmed their intention to re-develop the site. | Page 56: <b>Qualitative Assessment ...</b> <i>The site is within the urban area of Chiswell Green, a Tier 5 Settlement. There are a few mature trees adjacent to the site along the west, south west and north east boundaries. <b>The site is recommended to progress.</b></i> | Landowner has responded recently (summer 2025) to re-confirm their intention to redevelop the site and state that they consider that there is a realistic prospect of delivering the site by 2030/31. SADC has taken a more conservative view. | 2032/33                               |