

[REDACTED]

For the attention of : Matthew Birkinshaw BA(Hons) Msc MRTPI and
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Examination of the St Albans City and District Local Plan

Formal Objection to the release from Green Belt of Site M16 (Falconers Field, Harpenden) in the Local Plan.

Dear Sirs,

I am writing as a local resident to formally object to the proposed allocation of **Site M16 (Falconers Field)** in the emerging Local Plan and the **proposed change of designation of the site so that it may be released from the Green Belt to enable its use for development**. While I recognise the need for additional housing, this allocation is **unjustified, inconsistent with national planning policy, and would cause irreversible harm to the Green Belt, local environment, and community**.

The site at Falconers Field is an oasis of calm and animal activity on the edge of Harpenden - a quiet horses' field that provides a distinctive natural buffer and a refuge for wildlife. It supports bats, birds, deer, pollinators, and wildflowers, forming a habitat not replicated elsewhere nearby. Its permanent loss to development would be an irreplaceable erosion of this unique edge-of-town ecology, particularly when housing needs could instead be met on brownfield and urban sites.

I have structured my objections against the three key soundness questions:

Q1: Justification for altering the Green Belt boundary

- **Boundary Permanence**

NPPF paragraph 148 requires that Green Belt boundaries are enduring and defined by permanent, recognisable features. The *Green Belt Review 2023*, Annex SA-17 notes:

"The inner boundaries are readily recognisable and likely to be permanent. The outer boundaries are 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 boundary would require strengthening."

Releasing M16 would therefore create **weak, non-enduring boundaries**, which would compromise the integrity of the Green Belt.

- **Council Evidence – SA-17**

The Council's own Green Belt Review 2023 (Annex SA-17) shows that this parcel **performs strongly against Green Belt Purpose 1(b) (preventing outward sprawl)** and also contributes to Purpose 3 (safeguarding the countryside).

- **Not Infill**

Falconers Field is an **open, ecologically diverse field** at the edge of Harpenden with only limited edges adjoining properties. It is not a small gap enclosed by development, and 39 dwellings cannot reasonably be described as "limited infilling."

- **Sprawl Prevention**

Its openness contributes directly to preventing outward sprawl, a **core purpose of the Green Belt**.

Conclusion (Q1): The proposed boundary alteration at Falconers Field is inconsistent with NPPF 148(e) and (f). The site is not infill, and its release would undermine the Green Belt's role in preventing sprawl.

Q2: Exceptional circumstances

- **Failure to Exhaust Alternatives**

The Council's *Exceptional Circumstances Evidence Paper* does not demonstrate that brownfield and urban intensification options have been fully explored, contrary to NPPF para. 154. Until such options are maximised, Green Belt release is unjustified.

- **Greenfield/Inappropriate Development**

M16 proposes ~39 dwellings on **greenfield land**, which is classed as inappropriate development in the Green Belt (NPPF para. 147).

- **Green Belt Function – SA-17**

The review itself states:

"The lack of prominent outer boundary features means that the sub-area plays an important role in preventing the outward sprawl of Harpenden."

This confirms that the site performs a **strong Green Belt purpose** and that weak outer boundaries make it non-compliant with the NPPF requirement for clear permanent boundaries.

- **Openness and Visual Character**

The northern part of the site is an open agricultural field, providing a **visual buffer at the settlement edge**. Development would erode this openness and weaken the integrity of the Green Belt here.

Conclusion (Q2): Exceptional circumstances have not been demonstrated. Brownfield alternatives have not been exhausted, and this is land which the Council itself identifies as scoring strongly in fulfilling Green Belt purposes.

Q3: Policy justification, effectiveness, and consistency

1. Biodiversity and SAC obligations

The site lies within the Zone of Influence of the Chilterns Beechwoods SAC, triggering mandatory SAMMS contributions and SANG provision. No detailed mechanism for SANG delivery has been provided.

Falconers Field supports a rich biodiversity: breeding and nesting birds, deer, hedgehogs, wildflowers and many invertebrates, including pollinators which are increasingly vital to ecological health. Having lived overlooking this field since the 1980s, I have frequently seen bats foraging here in the evenings, and I have long understood that they roost in the nearby stables. If that is the case, those roosts are strictly protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. At the very least, full and seasonally appropriate bat surveys should be carried out before any allocation is made, because the loss of roosting habitat would be unlawful and damaging to local bat populations.

The fields also contain mature trees and historically ancient hedgerows which act as carbon sinks, biodiversity corridors, and climate resilience features. Removing them - at a time when farmers are being encouraged to plant hedgerows to support pollinators - would be perverse. The land also acts as a **natural sponge on elevated ground**, reducing flood risk downstream.

2. Transport and Infrastructure

The Roundwood area already experiences severe congestion, especially at school peak times. Falconers Field borders a secondary school traffic bottleneck where parking and pedestrian safety are already compromised.

As a resident, I see this every day: parents dropping off and collecting children overwhelm The Medlows and Falconers Field twice daily, despite parking restrictions. Cars also queue along the steep hills and country lanes that provide the only access to the site. Park Hill is already reduced to a single carriageway due to on-street parking, causing traffic to back up onto the A1081. Extending Falconers Field cul-de-sac would **intensify this dangerous gridlock**, increase emissions, and further compromise road safety.

No robust **Transport Assessment** has been published to demonstrate safe access or effective mitigation, contrary to NPPF paras. 111–113.

3. Flood Risk

Parts of M16 fall within Flood Zones 2 and 3. Sequential and exception tests required by the NPPF have not been demonstrated.

Conclusion (Q3): Site M16 is unjustified, ineffective, and inconsistent with national policy.

Overall Conclusion

Site M 16 is not infill: it is an **open field of ecological importance**, playing a vital role in **preventing urban sprawl, safeguarding the countryside, protecting biodiversity, and reducing flood risk**. Its release would create weak and non-enduring Green Belt boundaries, contrary to national policy.

The Council has not demonstrated exceptional circumstances. Brownfield alternatives have not been fully explored, and the methodology used has left clear gaps in evidence. Until those alternatives are properly considered, there is no justification for the irreversible loss of this valued Green Belt land. The council's own appraisal states that this land performs a **strong Green Belt function**.

For these reasons, I respectfully request that Site M16 **is not removed from the Green Belt** and that the Council revisit other sites which may have been excluded by its methodology but which offer more appropriate opportunities for housing delivery - including brownfield land, previously developed land, and so-called 'grey belt' locations - rather than sacrificing valuable Green Belt countryside.

Yours faithfully,

Maureen Hudson

