

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

Statement on behalf of Jarvis Homes

Matter 7 – Issue 2 – Harpenden Site Allocations

Policy M16 – Land at Falconers Field, Harpenden

DLA Ref: 98/009

October 2025

Introduction

1. This statement is submitted on behalf of Jarvis Homes, the land promoters of Falconers Field, Harpenden ('the Site'). 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 Q1, Q2, and Q3 raised in respect of Policy M16 (Falconers Field) under Matter 7 (residential site allocations) and Issue 2 (Harpenden site allocations).
3. The land promoters, Jarvis Homes support the proposed allocation of the site for residential purposes.

Question 1 – Is the proposed Green Belt boundary alteration justified and consistent with national policy requirements for permanence and clear, defensible boundaries?

4. The Inspectors ask at **Question 1**: *“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 Council’s Green Belt and Exceptional Circumstances Evidence Paper and the Stage 2 Green Belt Review prepared by Arup demonstrate that exceptional circumstances exist to amend the Green Belt in this location. The evidence base identifies a critical housing shortfall within the District arising from a prolonged absence of an adopted Local Plan and an acute affordability crisis, with delivery consistently below Government targets. Land at Falconers Field forms part of a wider sub-area (SA-17) which performs a limited Green Belt function and that its release is unlikely to significantly harm the performance of the wider Green Belt. The site was therefore recommended for further consideration in isolation as a discrete, contained parcel suitable for allocation.
6. The site is enclosed by well-defined, permanent physical features including the existing residential edge of Harpenden to the east, residential development to the north, and established hedgerows and trees forming mature landscape boundaries to the west and south. These boundaries are readily recognisable and are of a permanence which ensures that the new Green Belt boundary will be both durable and defensible over the long term. The revised boundary therefore accords with paragraph 148(f) of the Framework, providing permanence in the landscape.
7. The proposed allocation also satisfies paragraph 148(e) of the Framework. The revised boundary is drawn to help provide for the District’s development needs over the full Local Plan period without the need for further alteration at its end. The limited scale and self-contained nature of the allocation, coupled with its position adjoining the existing settlement, ensures that it represents a logical and sustainable long-term boundary to the town of Harpenden. Its release will not create pressure for further incursions into the open countryside or undermine the overall integrity of the Green Belt.
8. The release of this small, well-contained parcel will make an important contribution towards meeting identified housing needs in a sustainable location, while maintaining the openness and permanence of the Green Belt beyond. The proposed boundary alteration is therefore justified, effective, and consistent with paragraphs 148 (e) and (f) of the NPPF.

Question 2 – Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

9. The Inspectors ask at **Question 2**: “Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?”
10. From a general perspective, The Council’s Green Belt and Exceptional Circumstances Evidence Paper (GB.01.01), states that having undertaken an extensive and rigorous search for Previously Developed Land within existing built-up areas, there is an insufficient supply of such land to meet the housing need, which led to the Council undertaking a search process for sites in the Green Belt. In this context, the Paper thus concluded as follows:

“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. Further there are existing areas of significant built development created since the last Local Plan was adopted in 1994, identified in the Green Belt Review stage 2, where the Council has concluded that the necessary ‘Exceptional Circumstances’ exist to amend the green belt boundaries.”
11. With reference also to Section 3 (Strategic Context) of our previous representations made in relation to the St Albans Draft Local Plan 2041 Regulation 19 Consultation, with regard to the historic delivery of housing in the District, it is thus accepted the required Exceptional Circumstances’ necessary to amend Green Belt boundaries exist.
12. Arup’s Stage 2 Green Belt Review examined the broader north-west Harpenden area (sub-area SA-17) and found that releasing land at Falconers Field would be unlikely to cause significant harm to the overall performance of the Green Belt. The Review recommended the site for further consideration, either as a stand-alone allocation (RA-14) or as part of a limited release. In response, the Council has chosen to allocate only the northern portion of this sub-area, encompassing Falconers Field, representing a measured and evidence-based approach that safeguards the integrity and enduring function of the wider Green Belt.
13. The site adjoins existing residential development along Falconers Field to the north and east, and is enclosed by mature woodland and established hedgerows that create clear, permanent, and defensible boundaries. Access can be achieved directly from Falconers Field, reinforcing its close physical and functional relationship with the existing settlement. The site lies within a discrete parcel of land that performs a limited Green Belt role, with no visual connection between Harpenden and Redbourn. Development of the site would therefore not erode the openness or separation of the Green Belt, and its release represents a modest and

well-defined adjustment to the boundaries consistent with the evidence presented in the Stage 2 Green Belt Review and supported in the Local Plan representations.

Question 3 – soundness of Policy M16

13. The Inspectors ask at **Question 3**: *“Is Policy M16 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?”*
14. Jarvis Homes, as the land promoters of Falconers Field support the allocation of site M16 in the draft Local Plan. With reference to Section 5 of our previous representations made in relation to the St Albans Draft Local Plan 2041 Regulation 19 Consultation, the requirements of the policy are considered to be justified, effective and consistent with national planning policy.
15. A formal pre-application enquiry (PRE/2025/0072) was submitted to the Council in respect of the proposed development of 39 dwellings with associated access, parking, open space, drainage basins, amenity space, landscaping and links to the Roundwood Park School Site. The pre-application process provided the opportunity to discuss key technical and design considerations with officers in advance of this Local Plan Examination. The submitted site layout is appended at 1.
16. The Council’s pre-application advice has confirmed that the site is identified as allocated site M16 within the emerging Local Plan, and therefore demonstrates that the land is suitable for release from the Green Belt and for residential development. The advice acknowledged that, although the draft Plan is not yet adopted, the allocation reflects a positive approach to meeting the District’s significant housing need. The Council in their report identify that the site can likely be considered as “grey belt”, meaning it no longer performs a strong Green Belt function, and that its release would not fundamentally undermine the purposes of the wider Green Belt.
17. The pre-application response confirmed that the proposed development of 39 dwellings accords with the draft Local Plan allocation for the site (Policy M16). The Council considered this scale of development to be appropriate and deliverable, reflecting both the site’s context and its physical capacity. This position is, however, subject to further detailed design work to ensure suitable relationships with adjoining properties, adequate provision of open space, and full compliance with parking and residential amenity standards.
18. The Council’s response confirmed that there are no technical, environmental or design constraints preventing development of the site. The land lies within Flood Zone 1 and is at low risk of flooding, with drainage details to be confirmed in consultation with the Lead Local Flood Authority and Thames Water.

19. Although the site falls within the Chilterns Beechwoods Special Area of Conservation (SAC), appropriate mitigation can be secured through contributions to an offsite SANG (Suitable Alternative Natural Greenspace), further consultation with Natural England to find an appropriate SANG would be necessary. A minimum 10% Biodiversity Net Gain will also be required, alongside arboricultural and a Phase 1 Desk Study Report (Contaminated Land), none of which are expected to constrain the delivery of the site. The Crime Prevention Design Advisor supported the overall layout, recommending only minor improvements to surveillance of the Local Area of Play and boundary treatments. Overall, the Council concluded that technical and environmental matters can be appropriately mitigated, and that there are no barriers to the site's development in principle.

Appendix 1 – Pre-application enquiry proposed site layout:



NOTES:

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ATA (RESIDENTIAL) LIMITED

PROJECT:

Falconers Field
HARPENDEN

DRAWING TITLE:

Proposed Site Plan

SCALE: STAGE: DATE:

1:500 (A3) Prelim June 2025

DRAWING NO. REVISION:

A_2327 PSP1

DLA | Heritage

DLA | Strategic

DLA | Commercial

DLA | Residential

DLA | Leisure

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