

Questions raised by the Inspectors (in the “Matters, Issues and Questions for Stage 2 “) specifically in relation to Policy M16 – Falconers Field

Q1 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?

There is no justification to alter the Green Belt at M16. As will be explained below, the wrong map for the assessment was used by DLA in their 2021 report and all subsequent events show that the boundary will not be defensible and that serious harm will be done to the area if M16 is released.

In order to answer Q1 fully we think first describing this site and the connected and surrounding area is important.

Access

- M16 access would be via Falconers Field, which has a fork and a cul de sac. This road is used heavily by cyclists and walkers and particularly schoolchildren e.g. in 2023 the neighbours organised a schoolchildren count and, even though two year groups were missing post exams, 88 people (the majority children) crossed Falconers Field junction with Roundwood Lane during the school morning rush hour and 41 went across the Falconers Field cul de sac in the afternoon school rush hour. This week these numbers were counted again during the peak morning school drop-off and 121 non-vehicle users passed the fork. These numbers are much higher when the right of way through the Green Belt is muddy. The Herts County Council 2010 Highways Assessment (“ the Highways Assessment”) para 3.1 identified Falconers Field as having a few (in fact 4) almost 90-degree bends which makes visibility severely restricted and the cul de sac junction is actually a fork as well as a 90-degree bend so cars often have to come to a halt very quickly while who has right of way is established. There are blind spots at this junction and it can be very dangerous. A post box was moved to another road as Falconers Field was deemed hazardous for traffic and a grit box placed on the highways trouble spot at the Roundwood Lane/Falconers Field junction which highways assessments have also identified as having poor

visibility. Car use and parking have increased on the road since this assessment particularly due to parking restrictions made on Roundwood Park due to traffic issues near the school, making it much harder to navigate at school peak times. The presence of only a few extra cars make the fork on Falconers Field difficult to navigate safely and it shows if a cut-through was introduced at the end of the existing cul-de-sac to the school more cars would use it (as a drop-off point) than the fork could cope with and it would put users in more danger who would be using it to access the cut-through - never mind the huge (for this type of road) extra number of car journeys that the new housing itself would generate. Falconers Field is an attractive road and the openness of M16 from the gate on the road through to the rest of the Green Belt is integral to the area's rural nature and character. Children stop by the gate and even cut across to the school field, and the old horse mounting block by the gate all adds to the amenity enjoyed by the users. Falconers Field leads to the Green Belt and the Nickey Line and the road also leads, via Roundwood Lane, into the Green belt land known as New Farm. Those with more limited mobility can use the pavement on Falconers Field to enjoy the amenity of the Green Belt.

- In order to reach Falconers Field there are only two roads. One is a rural road called Roundwood Lane and is identified as by the Highways Assessment as a country lane. Para 2.43 of the Highways Assessment makes it clear that Roundwood Lane is not suitable for improvements. Assessments have always identified it is not suitable for any increase in traffic. It cannot cope with an increase in traffic, with even sections further east towards its junction with the main road (opposite the L&G site, i.e. Site B7 – North West Harpenden) struggling to allow two vehicles to pass and further west it quickly becomes a long single-track road. Para 6.1 of the Highways Assessment states that none of Roundwood Lane is suitable for coaches. The second road which leads to Falconers Field is Park Hill which becomes, on a tight 90-degree corner, Roundwood Park. It is used for traffic to the Roundwood Park Schools and becomes extremely congested easily and particularly when school buses try to pass. There is extensive on-street parking often on both sides of the road. Even on a Saturday morning cars queue half way up the steep Park Hill to access Luton Road (A1081). To one side of Park Hill is the Nickey Line which restricts improvements and access to the Roundwood area. It is worth saying at this point that (i) this is the area of Harpenden which will be most impacted by the approved planning application by L&G, including the 550 new residential units, at Site B7 and (ii) the draft local plan only provided for 293 units at Site B7, so the actual impact on the Roundwood area will be hugely greater than was envisaged when Site M16 was included in the plan as a site for investigation. Indeed Roundwood Lane will also

be impacted by increased traffic generated not only by this but also by all the new housing that is to be built in Redbourn and by the Luton airport expansion.

- The road access is particularly important given SADC's Policy 34 that development is unacceptable if traffic is significantly increased and that particular regard must be given to rural roads. M16 road access is significantly rural and lacks public transport and grinds to a halt in bad weather particularly due to its elevated position. Vincent and Gorbing's report for Herts County Council in November 2007 ("the Vincent and Gorbing Report") (extract at Annex 1) at para 3.1 states "the relatively remote location of the site [M16 being part of the Green Belt referred to] relative to shops and other services....means that the location is likely to be viewed as unsustainable". Plus at para 3.3 Roundwood Lane "could not be widened without harming its character and involving the loss of trees and grass verges". Some photos are attached at Annex 2.

Location, character and openness within the Green Belt - non-permanent boundaries

- As identified in the Vincent and Gorbing Report (para 3.1) the land which M16 forms part of is "in an elevated position on the top of a plateau, which means it is likely to be prominent to long distance views from the west". It forms part of the Green Belt land at New Farm which extends well beyond to its north, west and south. Indeed, the entirety of M16's southern and western borders are with Green Belt land, as is a significant part of its northern border. The Green Belt building line extends south from the easternmost point of M16. Accordingly it is a clear and prominent 'finger' extending into the Green Belt that it is part of (as shown at Annex 3 and on the relevant M16 plan in the draft local plan itself). The finger created is also shown in the photos at Annex 2. As such, if M16 were to be released for development, it would become a peninsular of developed land jutting out into, and surrounded on three sides by, Green Belt land: this is unacceptable, even on the new grey belt test. The stricter test that applies here – that development must not impact on openness - is certainly not met. When SADC met on 21st November 2012 and discussed a change of use from agriculture to playing fields, a one-storey pavilion and a car park were being considered just the other side of the north-west corner of M16 and SADC expressed "concerns [about the]..impact on openness of Green Belt" (see Annex 4 attendance note). Having housing in M16 will impact openness to a much larger extent. The local plan is being assessed under the same Green Belt regulations that were in place when planning applications were made previously to build on this Green Belt and those failed on openness grounds (see Vincent and Gorbing Report Annex 5). Herts Advertiser 25th April 2013 reports how the

planning application for football pitches at New Farm was withdrawn as the “planning officers had recommended refusal of the scheme proposed....The grounds....included the impact upon the openness of the Green Belt and a failure to check the unrestricted sprawl of large built-up areas....and Herts county council and SADC officers had held discussions about the impact of the development on local traffic and roads” (Annex 6). It is also pertinent to note that the withdrawal came soon after the residents submitted their own traffic report showing the harm that would be done by increased traffic.

- In respect of the need (as stated in the Inspectors’ Q1 above) for the Local Plan to ***define [Green Belt] boundaries clearly, using physical features that are readily recognisable and likely to be permanent***, it is clear that M16’s boundaries are not permanent and are not likely to become permanent. This is borne out by section 4.3 of the St Albans Stage 2 Green Belt Review Final Report dated June 2023, which provides an exhaustive list of “Permanent Man-made and Natural Features” in this context – none of these exist at M16. Instead, as can be seen from the photographs at Annex 2, the boundaries of M16 consist mainly of some trees with gaps between them, plus some shrubs and hedges. Another related point should also be stressed here – namely that fences and hedges are not an impediment to openness and accordingly do not detract from M16’s contribution to the Green Belt (nor do they reduce the extent to which M16 achieves the purposes of the Green Belt). This was confirmed to us by a representative of Vincent & Gorbing and documented in an email dated 13 January 2014 (see Annex 7). Sight lines are completely open to the south, west and a large section of the north and from the school field the north is extremely open by virtue of M16 as it currently is. From Falconers Field the openness of M16 is visible (i) from the gate (next to number 70) across M16 and (ii) looking south from the Falconers Field cul de sac. It is also open when looking south and west from the eastern boundary of New Farm. Looking to the south from Roundwood Lane and across the fields situated further west down Roundwood Lane M16 is also visible and part of the openness with, as photos annexed show, a line of hedges and some trees which is continuous and which new housing would interrupt. As the Annex 2 photos show, there is already a hedge and fencing running from north to south part way across the M16 site and this has not stopped the whole of M16 being considered (albeit incorrectly) for release from the Green Belt. This shows how the rest of the Green Belt is also vulnerable and that M16’s boundaries are not defensible.
- New Farm and M16, by virtue of being beautiful open rural land, is enjoyed by all who live in and visit the area. It runs to the Nickey Line and is used by walkers, schoolchildren, cyclists and horse riders. For decades children have visited the horses at the various open fence points as well as using the right of way with the

benefit of the openness surrounding them. This Green Belt is in constant use for access but mainly used for recreation and it is rare for someone not to be using it. It provides safe access to and enjoyment of the countryside which developing M16 would spoil (during and after the construction period) and put under threat. The hedges are a source of e.g. blackberries and holly for local people and visitors to enjoy and are habitats for a diverse range of nature. Children over decades have enjoyed being able to include this as part of a walk to school. It is integral to the character of this area. We have been told by both neighbours and those coming to the area how much this rural area is valued after the busyness of being in the centre of Harpenden or working in London and we have heard people relate some very moving experiences of those who have found it has helped rehabilitate them or their family members. The use and enjoyment of the area increased significantly during and after the pandemic as many more people have been working from home. Releasing M16 means users would be walking and cycling next to a building site and then houses instead of attractive rural Green Belt. The area adjoining M16 is not a golf course as DLA incorrectly asserted (as detailed below), but wild grasses and agricultural land which changes with the crops and seasons.

Are the boundaries defensible or likely to face alteration?

- As regards the need (as stated in the Inspectors' Q1 above) for the Local Plan to ***be able to demonstrate that boundaries will not need to be altered at the end of the Plan period***, if M16 is released it will make the Green Belt boundary vulnerable and not defensible. It will make it much harder to protect the rest of the Green Belt as it will create a 'boxing off' of the school field and the land behind Falconers Field up to the public right of way. This could create the opportunity for an infill as it may render that area more susceptible to a grey belt planning application. Previous local councillors in the press and in emails to us have already been flippant and wrong about land being surplus rather than respecting its Green Belt status and agricultural value. The Vincent and Gorbing Report mooted a land swap between the Herts County Council and Roundwood Park Schools so it is not a big leap to be concerned that the school field could be built on and the school given playing fields on New Farm. It will also create more access possibilities for future development into New Farm as a whole and even subsequently into the land beyond, much of which is owned by the same developer who owns M16. We already have evidence of worrying intentions to attack and not respect boundaries. When SKM (Sinclair Knight Merz) carried out their Green Belt Review Purposes Assessment Report for SADC in October 2013 and assessed the Green Belt during the early stages of the local plan in this area, they only considered the part of M16 that goes up to level with the north-western (i.e. Falconers Field) building line, and the equivalent part of the adjoining school

playing field to the south - this is identified as a parcel of land called 'SS4' (which can be seen on the map at Annex 7). It is only this part M16 which SKM looked at for potential release but depending on further assessment. SKM (at 8.3.1 of their Report) stated that SS4 was "land which will need to be further assessed by planning authorities in more detail to fully consider wider issues which are not covered by this report". SKM's assessment of the site was brief, preliminary and perfunctory, as shown by the fact that only one angle of photograph was taken, which did not show the open countryside next to it. However, despite SKM's recommendation, no further assessment took place and, as evidenced by the email exchange in Annex 7, SKM's assessment was accepted at face value rather than further assessments being carried out. In the process, however, SS4 was without explanation ignored and inexplicably M16 – i.e. **all** of the horse field - replaced SS4. In actual fact M16 was not included in the draft Local Plan until SADC called for landowners to offer up land. This has all made M16 unnecessarily vulnerable when it should not have been included in the process (certainly not beyond the part of M16 that falls within SS4).

- Our review of DLA's report dated March 2021 (ref: 98/009) (see Annex 9) has shed further light on SS4's apparent journey to becoming M16. In that report, rather than carrying out the further work needed to produce the fuller assessment that SKM said was needed, DLA relied heavily on the SKM report, quoting it extensively and uncritically. They refer to SS4 but have incorrectly taken it to be the whole of the horse field (see the area of land identified by DLA in the photograph in Annex 9). This shows that the report is fundamentally flawed and brings the soundness of the Local Plan into question. There is further evidence of the lack of assessment and understanding of M16, and the important Green Belt that it is part of, at 8.9 of the DLA report, which states that the new Green Belt boundary would mark a "clear distinction from the neighbouring golf course", whereas in fact there is no golf course next to M16 – in fact the north-western, western and southern boundaries of M16 are with farmed rural land. By stating that M16 abuts a golf course DLA have failed to recognise the full rural nature of this Green Belt site. Also M16 is not "tree lined" as the report says – this adds further weight to the fact that it does not have a defensible boundary. Given all of the above, the DLA report is simply wrong and cannot be relied upon. These inaccuracies and this confusion are damaging to the integrity and defensibility of the boundaries of M16, making it even more likely that they would be subject to alteration if M16 were to be released from the Green Belt.
- If there were any doubt as to the hopes/intentions of a developer to use M16's release to threaten more Green Belt land you only have to look at what Jarvis/Catton have submitted as a draft site layout plan for a proposed housing development at M16 (the "Draft Development Plan") (see Annex 8). The plan

does not use the identified access point into M16 in the Highways Assessment (at 1.5) which has a gate, a drop-down curb and is occasionally used for farm vehicles (see Annex 2) but instead proposes to access M16 through the cul de sac even though that would route the access through an additional three 90-degree turns (including a dangerous fork with limited visibility) along the narrow road from the Falconers Field/Roundwood Park junction and would involve the removal of hedgerow which Falconers Field residents have maintained for decades. In addition, the Draft Development Plan provides for an estate road that specifically opens into both the school field to the south and the Green Belt land to the north, creating not only a danger of infill in relation to those areas either side but also potential access to them. If the developer really wanted to protect the proposed new boundaries around M16 then they would have created a plan using the existing access point to the site and not sought to build beyond the western SS4 boundary line and they would have ensured that the newly-created estate road had no way of being extended beyond the site. However, even if only the portion of M16 up to level with the current Falconers Field building line were to be released from the Green Belt, this would not be acceptable as it could still put under threat part of the school field (from an infill application), which again demonstrates why changing the boundary in this part of the Green Belt would put its boundary at serious risk of future alteration. Accordingly, the Green Belt requires protection **reflecting the building line to the south-east** and the entirety of M16 should remain within the Green Belt. Certainly to go beyond the (Falconers Field) building line on the other side of the site will create an even bigger risk of infill in the Green Belt land behind Falconers Field as well as threatening all (as opposed to part) of the school field too.

- The Draft Development Plan provides for 29 dwellings yet the Local Plan provides for more than this, i.e. 39. These houses will not fit the nature of this area and not actually contribute towards meeting any need as the L&G development at Site B7 now has 257 more residential units approved in the planning application than appeared for that site in the Local Plan (i.e. 550 units as against 293).
- Green Belt boundaries are not determined by reference to ownership of the relevant land yet in truth the only reason M16 ended up being included in the current draft Local Plan is that it is owned by a developer. Not only this but the developer makes plain its future intentions to put more of the boundary under threat by how it wants to configure the development and particularly the roads in it. Due to how it has been drafted, the Draft Development Plan fixes, by the back door, access into the adjoining Green Belt – how can this adjoining area be protected from a future ‘grey belt’ release application? A rural protection belt has been mooted previously to protect this amenity, with the relevant land being sold to local residents, but how workable is this in reality?

- The Sustainability Appraisal (SA Report, September 2024), together with other supporting documentation published as part of the Local Plan consultation, reveals the following in respect of Site M16:
 - Most of the site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI).
 - In the red-amber-green analysis in the table that appears on page 148 of the SA Report the site is assessed as red under each of the "SAC", "Agricultural land" and "Multiple deprivation" criteria and light red in relation to being in an Area of Outstanding Natural Beauty ("AONB").
 - If the site were to be approved for development appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS).
 - Development proposals would also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.
 - Contributions / enhancements would be required to support relevant schemes in the LCWIP and GTPs as indicated in the TIA. These would need to include traffic calming on Roundwood Lane, and segregated cycling on Luton Road.
 - Proposals must include support for improvements to the local rights of way network, including access to the footpath adjacent to the western boundary and the Nickey Line.
- All of the above issues, taken together with the other matters we have set out in this hearing statement, render Site M16 unsuitable for development.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- No such exceptional circumstances exist – under the St Albans Stage 2 Green Belt Review Final Report dated June 2023 M16 scores highly for Green Belt purposes 1 and 3. The harms (including impact on openness, encouraging urban sprawl and infill, unacceptable impact on traffic and local roads) outweigh the benefits.
- So much harm is being done to this Green Belt when the purported exceptional circumstances (i.e. housing need across the district) do not outweigh such harm and can be met by the L&G scheme (Site B7) for this part of Harpenden. It is also

revealing and frustrating that the L&G plans, for example, make great effort to include green spaces to be enjoyed, yet the one area that is most open in Roundwood and enjoyed by residents is being threatened in this way. It is also an area that can be viewed and accessed directly from (by the gate) on the roadside pavement on Falconers Field (in the north-east corner of M16), which is not the case from anywhere else (Roundwood Lane having no pavement on the New Farm side).

- The Strategic Housing Land Availability Assessment 2009 (“SHLAA”) para 3.18 headed “Green Belt sites which are wholly or mainly Greenfield” looked at M16 (after Catton as the landowner had offered it up) and made it clear it could only be released in very limited circumstances without constituting a breach of policy (such circumstances clearly do not apply under either the PPG2 or the NPPF, as this hearing statement shows) and the greatest impact of such a release would be “encroachment into open countryside [not a golf course as DLA wrongly stated] and visual intrusiveness” and although it mooted only therefore developing the eastern side of the site as a result it recognised that this too would put “development pressure’ on the adjacent land. It would not be a stretch to surmise that if the green belt regulations had existed at the time this report would have said such a release would make an application under those regulations more likely. This land was then not included in the local plan and SKM’s assessment did not (as already detailed above) include all of M16. The SHLAA also recognised not only that it would put pressure on adjoining sites but also that the site had poor access to infrastructure. For the reasons outlined in this hearing statement it is not correct for DLA to conclude there are no constraints to developing M16.
- Planning rules dictate that any small areas released from the Green Belt for development should be under one hectare in area, whereas M16 is larger than a hectare.
- There would be huge disruption to the local area during the build period of any development at M16. The local roads in the Roundwood area simply cannot deal with construction traffic – in the case of Roundwood Lane this has been expressly confirmed by the Herts County Council Planning Development Control Engineer in a letter dated 11th October 2007 which, when considering coaches, said “Roundwood Lane is unsuitable for that type of traffic” – construction traffic will be similar if not worse. Therefore all construction traffic will have to use Park Hill, which will not simply not cope with it - and nor will Falconers Field itself. The Highways and Access Appraisals report carried out by Stomor (civil engineering consultants) in February 2011 identifies all sorts of problems at Park Hill which would occur if Roundwood Park School were to be extended in

size. Those problems would be even worse if one considers instead the increased traffic caused by the development at Site B7, Luton airport expansion and the new Redbourn and Hemel developments plus the construction (and other) traffic to and from M16 – all of which would be in addition to the works vehicles that already exist currently, due to individual houses on Roundwood Park, Falconers Field and Roundwood Lane being rebuilt in the ordinary course.

- An elderly resident who has lived on the local area for many decades was told by the fire brigade of the importance of M16 and the Green Belt land of which it is part to soak up flood water and, despite some improvements having been made, the bottom of Park Hill still suffers from flooding so this will only be made worse if the raised plateau of M16 is harmed. Plus of course the harm it will do to the air quality and the nature and biodiversity of the M16 site which (as identified by Pell Frischmann) is species-rich and is home to protected species like bats and sky larks and is also frequented by red kites. The area has a unique character by virtue of M16 creating openness and rural amenity from the road. The street WhatsApp group is a support to the neighbourhood and a recurring theme is sharing pictures of giant moths (Harpenden's Rothamsted Research stated "it is clear that a much bolder policy of habitat protection and restoration will be needed if British moths are to thrive...agri-environment schemes need expanding") and just this week a picture of a bird of prey in M16 and a hedgehog needing help were shared.

Q3 Is Policy M16 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- Roads policy and the Herts County Council local transport plan 2011-2031 resists development which increases the risk of accidents or changes the character of rural roads or local roads and any planning application to build on M16 can expect to be met with very fierce resistance from local residents as more people become directly aware of this danger. Many neighbours are already very concerned and have not known how to oppose what is happening. Residents will strongly oppose using the end of the cul de sac as the access point to the M16 site when a safer access already exists which could relatively easily be landscaped and improved with clearer sight lines.
- The true impact of the L&G development at Site B7 has not been established yet and the local roads certainly cannot cope with the development of M16 at the same time. Accordingly, even if M16 (or part of it) were to be released from the Green Belt – which is of course something we very strongly oppose - no planning application in relation to M16 should be submitted until the L&G development at Site B7 has been completed.

- There are various title issues with the M16 land which will make any planning permission difficult to achieve and hard to implement. For example:
 - a caution, recorded on the title to the M16 land on 26 October 1970, gives Roundwood Schools Trust a right of way over M16;
 - part of the M16 land has been maintained by Falconers Field residents for decades and hedges planted, with M16 being accessed by those residents throughout that time, creating rights of prescription in their favour; and
 - also for decades members of the public have used the land at M16 to gain access to Roundwood Park School via the school playing field (see photos at Annex 2), which again has created prescriptive rights.
- The release of M16 from the Green Belt cannot be sound when it got included in the draft local plan based on an inaccurate assessment relying in an incorrect way on SKM's preliminary report and with the wrong map used and when even the use of the adjacent land was incorrectly stated. M16 should never have included the land beyond the building line. If M16 had been accurately assessed by DLA and the correct map used (designating the SS4 area) then M16 would never even have included all of the site (i.e. the full horse field). The release of M16 would make the boundary indefensible and it cannot be deemed sound or consistent with planning policy when it creates a finger of sprawl into the Green Belt. It has clearly always been understood to be the case - including by SADC - that the release for development of anything that would constitute such a finger of land jutting out into the Green Belt is damaging to the openness of the Green Belt and creates unjustifiable harm. It would also create opportunities for grey belt applications to the south, north (and potentially even the west) with infill and land swap possibilities on this important conservation land as per the Sustainability Appraisal. The Draft Development Plan makes clear the future intentions that can be exploited if such sprawl of M16 was wrongly ignored.
- If only part of M16 (i.e. as per SS4) were to be released would the Local Plan sound? In short, for the reasons we have already identified, the answer is no (although one could say that it would make the Local Plan less unsound). Indeed, the SHLAA stipulated that such an approach would still put the adjacent land at risk which it now does more than ever before given the new grey belt regulations. So this too would still be unsound and produce a Green Belt boundary that is subject to alteration and would cause harm to roads, amenities and the character of the local area. As stated above, there is also the profound impact of the development of the L&G site at B7 to consider. So although this approach would be less unsound, it would still be still unsound and would cause harm which significantly outweighs the benefit from what will be a relatively small number of houses many of which will not be affordable housing (indeed, by most people's definition, none of those houses will be affordable).

- The Local Plan could be made sound in respect of M16 by protecting this land from release so that the owner of M16 can focus instead on how it can use the land consistent with a Green Belt use to be enjoyed by future generations and ensuring that no infill possibilities are created. The landowner could still make profit from such a use and if, for example, the land could be used for e.g. children to be rehabilitated with a fully-functioning horse field and some land more available for the community as well it would be particularly special to the neighbourhood, who recently lost one of its residents who did a huge amount for education and was one of the people (along with other local residents) who have for decades protected the hedges here and created such a sense of community – for example with the cul de sac’s annual Christmas lights switch-on.
- No doubt there will be accusations of nimbyism but in fact this Green Belt area is enjoyed by a much greater part of the community given its links to the Nickey Line (which was identified in The Times on 27/7/2013 as one of the 15 great cycle routes in the UK). The wider community will be harmed by the consequences of new housing in this particular location.

Conclusion

Too many errors and omissions have been made through the Local Plan process in relation to Site M16. The finger of sprawl will create considerably more harm (including to the local roads and their users) than benefit and will irreparably damage the openness of the area and create a boundary that is indefensible. M16 also needs protecting given the additional housing numbers now added in the L&G planning permission for Site B7.

For all of the reasons that we have set out in this hearing statement M16 must not be released from the Green Belt.

Mr and Mrs Jenkins-Greig

16 October 2025