Objection to release from Green Belt of site M16 Falconers Field (HELAA Ref: HT-04-21), Hearing session stage 2

Dear Sirs,

We are writing to object to the proposed release from the Green Belt of site M16. This allocation is not supported by evidence and would cause harm to the Green Belt and surrounding area.

The loss of this Green Belt would be the start of continued erosion of the Green Belt in this area to the North of Harpenden and is particularly unnecessary given the proposal for Site B7 550 dwellings on the other side of the Luton Road (which were much fewer in number at the time of the original decision to look at M16).

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 for altering the Green Belt boundary at M16. St Albans Council's own Green Belt Review 2023 shows this area prevents outdoor sprawl of the Green Belt and safeguards the countryside. If this were to be altered, it would not be long before there were further alterations increasing urban sprawl into the countryside, including affecting the public right of way at the West end of M16. The public right of way is in constant use for recreation which developing M16 would threaten.

The site is not infill and is next to a school playing field and a public right of way. Falconers Field is a heavily congested road already at school pick-up time before the extra traffic to be generated in Park Hill and Roundwood Park by the children of the owners of the new extra site B7 550 dwellings on the other side of the Luton Road who will attend Roundwood Park School.

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

We do not believe there are exceptional circumstances existing to justify amending the Green Belt boundary.

St Albans Council's own Evidence Paper Stage 2 Green Belt Review Final Report dated June 2023 states that M16 scores highly for Green Belt purposes 1 and 3 and therefore

there are no exceptional circumstances to justify amending the Green Belt. In additional Brownfield alternatives have not been exhausted.

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

We do not believe that Policy M16 is justified, effective and consistent with national planning policy.

The Local Plan could be made sound by protecting M16 from development and focusing on its use consistent with Green Belt purposes.

No proper transport assessment has been performed to demonstrate safe access or traffic mitigation thereof and in particular, the impact of 550 dwelling Site B7 development on transport has not been considered and the local roads (e.g. Park Hill) certainly cannot cope with the development of M16 at the same time. In addition, no proper biodiversity assessment has been made.

In summary, releasing M16 from the Green Belt would create more harm than benefit, damage the openness of the area, and create an indefensible boundary. M16 should remain within the Green Belt.

Tim & Hayley Rogerson