

Objection to proposed Firs Wood Close Development 6/2023/2418/OUTLINE

1. The proposed development is inappropriate development in the Green Belt which would harm the openness of the Green Belt. There are no special circumstances given for this development.
2. The proposal conflicts with both the WHBC Local Plan and the Northaw and Cuffley Neighbourhood Plan. The site is not a designated site within the WHBC Local Plan and the Local Plan already has provision for housing for retirement during the period of the Plan. The vision of the Northaw and Cuffley Neighbourhood Plan states that *'over the next fifteen years the Green Belt is maintained as open land free from development'*
3. The proposed development is unsustainable in that it is isolated from amenities such as shops, medical facilities and libraries in Potters Bar some 2km away and there are no transport services along Coopers Lane Road. The nearest bus service is approximately 0.5km along Hook Lane which is an unlit and unmettled bridleway and this service (242) is infrequent. There is no continuous footway between the proposed development and Potters Bar. Therefore, residents would be entirely dependent on private cars for transport. The Framework Travel Plan states that *'the site is in a location that is not readily accessible by a range of modes of transport. Provision for pedestrians to the wider area is via PRow, with cyclists also able to use the available PRow and cycle on Coopers Lane Road, if they are confident.'* The proposed 'electric village transport scheme' has no details of how this would be funded, whether by the management company or residents/staff or of the service it would provide to residents, and as such has no value.
4. The proposed development is open green space and would harm the visual amenity due to its large size and mass (150 new dwellings). It would be clearly visible from the other side of the village on Northaw Road West where I live. It would also impact on the existing small-scale developments alongside it with extra traffic, noise and disturbance
5. The statement that the site is 'previously developed land' (PDL) was also emphasised at the public consultation held by the developer. However, as stated in the PDL report submitted by the developer, the definition of PDL according to the NPPF (2021) excludes land that *'was last occupied by agricultural or forestry buildings'* and *'land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'* The kennels were abandoned ca. 1985 and an application in 1987 (S6/1987/0171/FP) was approved with a planning condition that the land should be reinstated to grassland. The structure shown on p. 7 of the PDL Report is a small shed which may or may not have been associated with the kennels. The reference to fencing and posts, also illustrated, could not be evidence of PDL as these are temporary structures and could have been erected for agricultural purposes subsequently. In effect, the proposal that this is PDL does not stand up to scrutiny.
6. Woodland, Veteran trees and Ponds are all important ecological features according to the Habitat and Detailed Botanical Survey Report which would be impacted by this

development. It should be noted that the last survey was carried out in November 2021 and there have been reports of tree felling on the site subsequent to this. The report states '*P2, P3 and P5 qualify as Priority Habitat Ponds as they support the European Protected Species Great Crested Newt Triturus cristatus and as such, are considered to form important ecological features.*' The Ecology Report states that '*Trees within the site, particularly those identified as Veteran trees, are likely to support features with the potential to support roosting bats, including the Annex I species Barbastelle recorded during the activity survey work; albeit detailed survey work with regards to roosting bats in trees has not been undertaken to date.*' The redacted Ecology Report suggests that badgers may be present in which case a new badger sett must be created as mitigation but only after assessment of its impact on adjacent family territories. The Biodiversity Net Gain (BNG) Report p.2 assumes that BNG will be achieved but only if the development proposals follow a similar layout, that all woodland and ponds are retained, and all enhancements carried out and also that 330 trees will be planted. These are not guaranteed.

Based on these comments I suggest that WHBC should refuse this application.



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