

Objection re 6/2019/1370/MAJ Firs Wood

Introduction

No "very special circumstances" (NPPF Feb 2019) exist that would allow development of this site to proceed. Any attempt to develop this site would also be rebutted by the following 16 substantive issues and legalities.

A. PERSONAL HEALTH ISSUES

The main exit/entry route to this site is from Coopers Lane/The Causeway which is already overcapacity and one of the most congested roads in the whole area. [REDACTED] air pollution already along this stretch of road.

The consequential increases in traffic congestion here and further congestion relating to traffic on the M25 and related feeder roads would make this untenable [REDACTED]

Air pollution concentrates in congested areas and other traffic flow increases from surrounding new housing developments will make travel here untenable.

Please add to this the health impacts on children at Stormont school where you have no diffusion devices or road analysers to monitor pollution levels.

B. POLLUTION

- a) This is already exceeding EU thresholds of 40 ug/m3 in parts of the villages thus new construction with increased traffic loads will substantially raise these levels.
- b) WHBC are not testing for all primary and secondary air pollutants which would increase materially with over development. Thus WHBC will be unable to cover health impacts and health costs.
- c) [REDACTED]
- d) This year there are 660 residents in our small villages who have received treatment at Cuffley surgery for respiratory problems. A 9% increase in just three years. These promoted sites will increase this beyond sustainable levels and our surgery currently is already overcapacity.
- e) With overdevelopment relating to this and other sites, there will also be material increase in light pollution, noise pollution, microplastics pollution and an increase in non-ionising radiation pollution by the substantial addition of cellular devices and IoT devices leading to an increase in power flux density. Over and above this will be pollution of the natural brooks and streams especially on this site where natural habitats and wildlife are prevalent.

C. INFRASTRUCTURE, TRANSPORT, TRAFFIC FLOWS

Current road infrastructure is already at or over capacity on normal work days. Incidents on the M25 around junction 24 happen regularly and in these instances it can take me up to two hours to get from junction 24 to home which would normally take 10 minutes maximum.

Because of limited existing road infrastructure, roads into and out from the village cannot be improved. For example, one of the main exit routes along Coopers Lane into the Causeway is single file traffic with houses one side and a large pub on the other. This cannot be widened.

A previous study of traffic flow improvements advocated a roundabout on the approach to Station Road and on the Cattlegate road current junction, but concluded that it would not aid traffic flows. Development of this site will therefore exponentially increase traffic loads to unsustainable levels.

D: IN DIRECT VIOLATION OF GREEN BELT LEGISLATION

The Council and any developer will never be able to justify "exceptional circumstances" nor satisfy "openness", checking "unrestricted sprawl", "safeguarding the countryside from encroachment" and other NPPF requirements.

It will violate the following specific NPPF statements in relation to item **13. Protecting Green Belt land**

"133. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." **This site not only violates this but will increase urban sprawl.**

"134. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land." **This site not only violates this but directly acts against these provisions.**

"136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." **There are not only no "exceptional circumstances", there are no circumstances AT ALL.**

E. PROMOTING SAFE AND HEALTHY COMMUNITIES

This promoted site would contravene the following element of the NPPF 2019:

"91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: c) **enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example**

through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

F. SCHOOL CAPACITY

Northaw and Cuffley have limited school places and are already at capacity with waiting lists. Therefore the following NPPF item would be infringed if this promoted site goes ahead:

“94. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. ”

G. OPEN SPACE AND RECREATION

Development of this site would contravene these NPPF statements intended to protect and safeguard open spaces:

“96. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities

97. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements. **This has not been undertaken.”**

H. PROMOTING SUSTAINABLE TRANSPORT

Transport flows through the two villages are currently at capacity or simply shut down for prolonged periods if there is any incident in the villages or on the M25. Development of this site would infringe upon statements in the NPPF, items 102 and 103.

Please note also that the current excessive HGV traffic and HGV road blockages at Chas Storer’s which residents have constantly complained about, would become substantively aggregated congestion and pollution points with any further housing development.

Please also note that with new housing developments planned in Crews Hill, Goff’s Oak and Cheshunt this will become completely unsustainable, even without this promoted site being developed.

We have seen no evidence at all that any research or studies have been done yet on the aggregated impacts of increased traffic, congestion and pollution that neighbouring

developments will cause in the villages, let alone new developments in the villages themselves.

I. MAKING EFFECTIVE USE OF LAND

The most effective use of this site is to retain it in terms of its openness and green belt status and the function it performs as a 'carbon sink' and a natural habitat for local species of insects, birds and wildlife. This new development would also contravene NPPF items 117 and 118

J: IN DIRECT VIOLATION OF CLIMATE CHANGE REQUIREMENTS

Please note that WHBC have declared a Climate Emergency. The seriousness of this existential crisis cannot be overstated and means that sites like this have to be protected like never before. Health impacts and mortality rates are rising at an unprecedented level.

My objection here focuses upon the fact that this promoted site of will materially increase levels of air pollution which will exceed EU thresholds as is already the case in Station Road Cuffley as an example.

Increased levels of pollution fuel the greenhouse effect, increase global warming and provoke extreme weather conditions and the other key indicators of climate change which is driven by human activity.

Development of this site. will directly contravene provisions in the NPPF section 14. Pre-eminent violations concern the following specific items 148., 149, 150 and 151 with loss of biodiversity, green infrastructure, carbon sinks and natural habitats and the function they perform not only locally, but also to central London.

Pleas note: LOSS OF GREENBELT AND ITS CARBON SINK FUNCTION AND OXYGEN REPLENISHMENT FUNCTION WILL CREATE POWERFUL DESTRUCTIVE FEEDBACK LOOPS. THIS MEANS THAT NOT ONLY DOES IT CEAE TO BE THE LUNGS OF LONDON, BUT BECAUSE OF THIS IT WILL FEEDBACK LOOP MORE POLLUTION BACK INTO CENTRAL LONDON. THIS IS AN EXISTENTIAL CRISIS. DESTRUCTIVE POSITIVE FEEDBACK LOOPS CAN RARELY EVER BE REMEDIED. YOU CANNOT SIMPLY RE-CREATE GREENBELT ONCE IT HAS BEEN CONCRETED OVER.

So not only will development on this promoted site not fulfil NPPF and WHBC climate targets and policies, but conversely, they will escalate carbon emissions and the aggregation of other pollutants. It will be in direct violation, for example, of item 148 from the NPPF 2019.

K. FLOOD RISK

Several areas of flooding nearby and around the promoted site will be increased if development goes ahead. And there is currently an existential problem regarding

drainage infrastructure. Thus item 163 of the NPPF will be breached as flood risk will be increased.

"163. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere."

L. HARM TO NATURAL HABITATS AND BIODIVERSITY

This site has areas of natural habitat and biodiversity in Pond and Firs Wood, Northaw Wood, Northaw Brook etc. which would be harmed in construction works and the laying of foundations.

Moreover this site is located within the Green Belt and any development would:

- A) Destroy the open nature of the landscape beyond the woods
- B) Disrupt migratory patterns of wild birds and rare birds.
- C) Pollute close to surface streams.

All new build construction here will thus directly contravene the following NPPF sections 170, 171, 172, 174, 175, 180 and 181.

The direct violation of 170 for example is set out here:

"170. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;..... d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..."

N: REMOTENESS OF LOCATION

This promoted site violates NPPF items 181 and 183 as below:

"182. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). "

"183. The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning

decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities."

O. CAR PARKING

Nearby commuter stations of Cuffley and Potters Bar are at capacity and on some days it is not possible to park there or nearby during rush hours. With new housing developments planned in Crews Hill, Goff's Oak and Cheshunt this will become completely unsustainable, even without new developments in Northaw & Cuffley taking place. When the traffic flow/congestion studies are done, joining up the higher levels in all the surrounding villages, there will be absence of parking facilities anywhere, gridlock in rush hours and illegal levels of ambient pollution.

P. CHARACTER AND HISTORY OF THE VILLAGE

Northaw is considered to be one of the original Manors granted to the monks of St. Albans in 793. Northaw Woods, part of the forest of Enfield Chase, was leased to the Valoignes family about 1086. A chapelry was founded at Northaw in 948. In 1215 the existence of a church is recorded.

This site and other promoted sites would destroy this historic character by increasing urban sprawl and overlaying tracts of land that retain the openness, beauty, character and history of both villages.

In addition, the Green Belt around Cuffley and Northaw and Potters Bar is an area of local beauty which is valued by residents and visitors alike. The countryside is popular with walkers and used by schools and youth organisations to practise Duke of Edinburgh expeditions and camping. Those attending the many organised leisure activities such as the Point to Point, the Camel Racing, and concerts enjoy the views across the Northaw Valley.

This is all under threat should this promoted site go ahead with even one other site in the village. This issue which I am raising here (P.) is in direct contravention of four of the five purposes of Green Belt as stipulated in the NPPF of February 2019, as follows:

"134. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns;