

Mill Hill Preservation Society founded 1949

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For the attention of Elizabeth Thomas
Planning Officer, London Borough of Barnet
Development Management & Building Control Service
Barnet House
1255 High Road
London N20 0EJ

30th March 2017

Our Ref: JL / jl / mhps planning St Vincent's / 17/1204/FUL

Dear Elizabeth Thomas,

TOWN AND COUNTRY PLANNING ACT 1990

SITE: St Vincent's Catholic Primary School, The Ridgeway, London NW7 1EJ

PROPOSAL: Improvements to the school grounds to create level areas to be used for outdoor sports, growing fruit and vegetables, informal recreation and general outdoor education and play.

PLANNING REFERENCE: 17/1204/FUL

1.0 Introduction:

1.1 The Committee of the Mill Hill Preservation Society (MHPS) have examined the application on the LBB planning website; we have met the School's design team in committee and attended a public exhibition showing the proposal. We have canvassed the opinions of neighbouring residents. This is a site in the Green Belt, in the Mill Hill Conservation Area and is designated as a Borough Grade II Site of Importance of Nature Conservation (SINC) being the only part remaining of the Drivers Hill Nature Reserve and is therefore a site that requires special consideration.

1.2 The Planning, Design and Access Statement (February 2017) under 'The Proposal' notes the importance of the Forest School concept under item 2.9 – 2.11. We understand from our research that formal playing fields are not part of the concept which concentrates on: environmental education, field studies, bushcraft, horticulture, earth education and adventurous activities. There is already an orchard at St Vincent's School that was given to them under the Growth for London scheme in 2009, registration 108, and which is somewhat neglected and will be further impaired by the proposed landfill. The focus on Forest Schools may just be a ploy to obtain the income from the landfill, doing considerable damage to the Green Belt in the process.

2.0 National Planning Policy Framework:

2.1 We referenced the National Planning Policy Framework (NPPF). Section 9, Clause 89 allows "provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it." In this case the sports facility is only available because of the proposed landfill, and as the landfill is put over a site of Borough Importance for Nature Conservation this does in fact conflict with the purpose of including the land in Green Belt and the Conservation Area, and is therefore inappropriate. There are no special circumstances argued in the application that would ameliorate this.

2.2 Similarly under Clause 90, engineering operations are singled out as 'not inappropriate' – however this also relies on the fact that the work does not conflict with the purposes of the land being included in the Green Belt. As the site is of Borough Importance for Nature Conservation the engineering operation (i.e. 30,000 cu. metres of landfill) does in fact conflict with the purpose of including the land in Green Belt, and is therefore inappropriate

2.3 In our opinion there are other flatter parts of the site that would facilitate a sports pitch (without the need for landfill over a SINC) that have not been explored in this application.

3.0 Local Planning Policy:

The application raises various local policy issues from the Barnet Local Plan (Core Strategy) 2012. These are set out in the Planning Design & Access Statement dated February 2017.

Clause 5.2.1 Section 6: Vision and objectives:

The first clause quoted from this section is headed "To ensure efficient use of Land and Natural Resources", which applies to "development of previously developed land" and is therefore not applicable to this application.

The second clause quoted from this section is headed 'To enhance and protect our green and natural open spaces' which calls for new enhanced public spaces, which this is not, and for the protection of biodiversity – which this landfill project does not do.

Clause 5.2.2 Section 7: Barnet's place shaping strategy:

Under 7.3 Protection, clause 7.3.1 is being quoted that calls for the protection and careful stewardship of open space assets. We consider that this landfill project does not comply with the clause as irreparable damage will be done to the Green Belt and the SINC. There are also other parts of the site that can provide for adequate sports facilities.

Clause 5.2.3 Section 12: Enhancing and protecting Barnet's open spaces:

We believe a balance has to be struck between the provision of sports pitches, of which there are over 277 in the borough, and the need to protect and preserve the last vestiges of natural habit in the borough, of which this site is an example. There are also other parts of the site that can provide for adequate sports facilities without the need for extensive landfill.

Clause 5.2.4 Section 15: Enabling inclusive and integrated community facilities and use:

We do not see the relevance of Clause 15.7.7 to this application as it is about the provision and the setting up of a range of schools in Barnet, not a landfill project.

Clause 5.2.5 Policy CS13: Ensuring the efficient use of natural resources:

Again, we do not see the relevance of this clause to a landfill scheme that basically destroys a SINC that we see as a heritage asset, and does not involve the other items this clause covers, such as: wasted heat and power, buildings with reduced carbon dioxide emissions, mixed use town centres, improving energy performance, SUDS and water management, improvements to air quality.

4.0 Methodology for proper transportation:

4.1 During the work some 30,000 cubic metres of soil will be delivered by 1,500 truck journeys from a building site in St John's Wood. Using the information submitted in the report section '8.0 Conclusion' states that there will be one truck entering and exiting the site every 10 minutes between 9.30 am & 3.00 pm each week days for 16 weeks. This equates to one truck trip every five minutes.

4.2 To suggest trucks travelling from St John's Wood to The Ridgeway in Mill Hill will keep to any meaningful time schedule is to deliberately mislead. A truck marshalling area will need to be set up close to, but away from, the site so that trucks can be called in to try to keep to the planned programme of work. Such a holding area would require a lot of space and no provision has been made for this in the application.

4.3 The Ridgeway is in the Mill Hill Conservation Area and the proposed enormous increase to the already congested traffic is a planning consideration. Any visit to The Ridgeway during the school term indicates very clearly that there is traffic congestion between 09.30 and 15.00 hrs with buses, parked cars and general traffic causing delays and queueing along this rather narrow main road in this leafy part of Mill Hill. There is also considerable construction traffic serving other sites in the area. The proposed additional entrance to the site with vision splays will restrict the parking areas on The Ridgeway, which will lead to overspill parking in other nearby roads.

5.0 Materials Management Plan:

5.1 There is much information missing in this document, as, although referred to in the text, there are no drawings or sketch figures included. A basement in St John's Wood is to be excavated to provide the waste to be used as fill on the St Vincent's site but the programme for that excavation work is not known. It is critical to know at what speed those excavations will take place - as delays to that operation will have a profound effect on the delivery timetable to the St Vincent's site.

5.2 The transport assessment by M S Ford Associates analyses truck routes to site under section 4 of their report. The Society would wish that truck routes should avoid as much of the Conservation Area as possible. The suggested route using Holders Hill is acceptable, but the alternative route coming off the A1/A41 at Apex Corner into Marsh Lane and then travelling the whole length of the Conservation Area is not. We trust that if permission is granted there will be a condition controlling truck routes.

6.0 Flood Risk Assessment and Drainage Strategy:

6.1 No soils investigation of this site or the donor site for the waste fill material has been submitted. Most of the subsoil around St John's Wood and Mill Hill is London clay. The application refers to permeable material for filling around drainage and for mixing with sands – for example see Clause 6.2

'The features will be constructed by re-profiling the ground surface using placement of selected imported inert spoil from local sources together with top soil and subsurface drainage layers to be formed using imported granular materials (sands) and geotextiles'.

Importantly, this material will presumably be in addition to the fill imported from the St John's Wood site and has not been accounted for in the truck movement figures. If general remodelling the ground surface levels of this site with the clay fill from St John's Wood is not to cause increased water run off down towards Woodcote Avenue and exacerbate the existing drainage issues, the amount of granular fill will need to be substantial (more truck movements) and the increased volume of water directed into the drainage network will be significant. The existing 'natural' drainage routes will be disrupted and changed in the long term. This will further increase the load on the already heavily burdened existing system, downstream.

6.2 Clause 8.4 discusses Swales. The NHTB drawing *Flood Risk Assessment & Drainage Strategy* shows three green hatched areas marked swales. The problem we have with these is that they are shown on sloping ground and the contours of the land on the landscape drawings do not show any change to the land profile to accommodate the swales. In other words, whilst the report talks about swales and controlling water run-off, the drawings do not properly show this. As shown there is nothing to stop excessive water run-off from flooding the lower areas of the site.

6.3 Clause 8.5 discusses French Drain Cut-off: The Society is not convinced that the final outflow into Woodcote Avenue will be an appropriate solution. This area is prone to flooding from surface water and so the capacity of the existing drainage system must be limited. No calculations have been provided to show that the combination of swales and the French drain proposed will be fit for purpose to deal with the likely surface water run-off. This is rightly of great concern to the residents of Woodcote Avenue.

7.0 Contradictions in the Application:

There are contradictions in the information provided for this application that need to be resolved.

7.1 Pathways: the various drawings show different routes for paths and one drawing actually shows a pathway linking with Woodcote Avenue (Hayden's drawing number 4088-D). The Society suggests that this would be a poor solution as school traffic would be generated in Woodcote Avenue to avoid The Ridgeway congestion, and that this would be most inconvenient to the local residents. See also aerial view 17_1204_FUL_ARIEL_IMAGE_OF_PROPOSALS_3635631.pdf that shows both paths and pitch in different positions.

7.2 The NHTB Layout Selection Statement (April 2013). Section 3 talks about the size of the playing pitch reducing from 90m x 45m to 75m x 50m – but the report was written in 2013 and so the pitch has not been reduced as part of the current design work. It also states that the pitch has been placed “as far as possible westwards from the end of Woodcote Avenue by placing it immediately adjacent to the gas main to the west and the existing wooded area to the north”. None of the drawings submitted show this location.

7.3 It is not clear from the drawings which trees and hedgerows will be lost, or how these are to be replaced. We presume that if planning is granted a condition will be included to ensure that there is at least equivalent replacement planting.

7.4 The aerial view of the site (Picture2 proposed arial view.jpg) does not match the landscape plan by Jon Etchells (JEC/383/100 dated April 2015). Comparison between the drawings also highlights the point raised above (7.2) that the pitch has not been moved as far west as possible.

8.0 Conclusion:

If the proposed application went ahead it would destroy an unspoilt piece of land that is home to badgers, deer, foxes, owls and many other animals, put houses in Woodcote Avenue at great risk of flooding due to inadequate drainage in the proposed scheme, create an awful blight on the whole of the valley known as Drivers Hill Nature Reserve https://en.wikipedia.org/wiki/Drivers_Hill, and encourage further destruction of Green Belt land within Mill Hill. Moreover, the huge number of truck movements over an extended period on The Ridgeway, in the Conversation Area, will greatly exacerbate the traffic congestion that already blights the area. The Three Strands Approach adopted by the Council in planning matters has the primary protection objective of “Protection of the Green Belt”. For these reasons we believe this application should be refused.

Yours sincerely

John Living

John Living

Chair: On behalf of the Committee of Mill Hill Preservation Society