Inspector for the Secretary of State, executives and officers of Barnet Council, residents of Barnet:

Planning Inspectorate Reference: APP/N5090/W/24/3346789

Proposal: A material change of use for stationing of caravans for residential use with hardstanding and dayrooms ancillary to that use

This is an objection to the Proposal, on the grounds of *Environmental, Ecological and Public Health* implications due to the site being a designated flood plain, in close proximity to the Dollis Brook an important tributary of The Thames, and insufficient consideration for the health and safety of the potential occupants of the site and also the grave risk of contamination by way of effluent discharge into the Dollis Brook.

I am not a sewerage or waterwork engineer but I live in the vicinity of the land in question for over 20 years. I am a graduate engineer and am currently involved in commercial real estate investments in Central London. I had also served in the military for several years and had a professional interest in geography and topography.

The piece of land that is the subject of today's appeal is sited on a flood plain of the Dollis Brook, which is a major tributary of the River Brent, which in itself is a major tributary of The Thames. This land and its immediate vicinity are severely impaired because of its natural topographical features (the flood plain and its relative low elevation to the surrounding high ground) and the fact that it is adjacent to a very large tarmac area and a huge pitched roof structure, 100 yards to its East. The owner of the neighbouring property and Barnet Council have recognised this physical impairment and the owner had constructed with the approval of Barnet Council, in the late 1980s, a Detention Pond of approximately 25 x 25x 3 metres, sited just 50 yards south of the proposed Caravan site and on the South-East corner of the subject land.

Further, said piece of land is immediately adjacent to a road (Mays Lane) that is in constant use and the land's main access point is very near to a culvert (or crossing) that allows the traverse of the Dollis Brook, across and under Mays Lane. To this point, I shall return later.

Subject land is also in an area of flora and fauna that are part of the delicate balance of the Dollis Brook waterway, nearby woodlands and grazing grounds.

[see pictures 1 and 2 : describing the orientation of the land relative to Dollis Brook, the detention pond, tarmac and pitch roof developed area; Pic 2 shows the Thames Water flood plain and the Department of the Environment flood risk map of the subject land]

Thames / Affinity Water and the Environment Agency, have identified this flood plain and the Dollis Brook tributary as an area for critical and continuous monitoring of and testing for illegal or inadvertent sewerage discharge and effluent, as well as the quality of surface water run-off from the neighbouring

tarmac area. The shallow water table and the clay soil, endemic to North London, together give rise to a very an unstable soil (hydraulic) condition and an increased propensity for local ponding and general area flooding. There is also the serious consequence of inadvertent discharge of waste water, effluent and rainwater run-offs into The Thames, via the Dollis Brook. I have enclosed pictures and videos, which I must stress, were taken on different days and seasons over the past year. They are representative (regardless of the change of seasons as the pictures indicate) of the constant ponding and flooding that residents and the environment, face frequently, throughout the year. [see video 1 and pictures 3,4, 5]

Because of the very frequent and significant run-off, ponding and flooding; and the regular discharge of accumulated surface water by the nearby Detention Pond; any development or siting of human habitation (permanent or otherwise) will result in contamination of the Dollis Brook and its vicinity. And consequently, to The Thames itself. This is, notwithstanding, whatever pre-emptive or remedial measures the potential occupants of the site may take.

And because of the London clay conditions and the shallow depth of the local water table, this piece of ground is always soggy and hydraulically unstable. This would result in a negative impact on any new sewerage lines, treatment plant or septic tanks, that the human habitation of the proposed caravans may install. This would be a very serious health and safety matter for the owner of said piece of land and the occupants of the caravans.

The plan for caravans has not given careful consideration about the Health and Safety aspect for its occupants, in relation to the unsuitability of the land for any form of SuDS (sustainable drainage systems) that the owner may contemplate. Laying of sewerage lines in excess of 200 yards or more, to the nearest common sump, or having a septic tank or pond or treatment system, would greatly increase the risk of accidental discharge of raw effluent and wastewater into the Dollis Brook via ground seepage in the flood plain. In the case where not all raw effluent is discharged into the Dollis Brook, the frequent ponding and flooding would turn the land in question into a health risk for the caravan occupants; and also to the neighbouring properties.

A last but not insignificant point in relation to the local regular flooding is that the main access point of this piece of land, being near the culvert that traverses the Dollis Brook, is in itself, a road safety hazard, as the Dollis Brook often breaches its banks at this very spot. Aqua-planing of vehicles had been observed in the past and this is a hazard to both motorists and pedestrians on Mays Lane.

Submitted:

Bernard Cheong









