

Mr Adam Ralton
London Borough of Barnet

Our ref: NE/2015/122118/01-L01
Your ref: 15/00286/FUL

Adam.ralton@barnet.gov.uk

Date: 24 February 2015

Dear Mr Ralton

Creation of an 18-hole golf course with ancillary clubhouse. Associated car parking and landscaping.

Land West of Edwarebury Farm House, Nr Edware, Barnet.

Thank you for referring the above application. I apologise for the delay in sending our response.

We **object** to the proposal as submitted.

Reason 1: Flood Risk

The application site, indicated by the submitted plans, lies predominantly within Flood Zone 1 - defined by [Table 1](#) of the National Planning Practice Guidance, [Flood Risk and Coastal Change](#) (section 25) as having a low probability of flooding. However the proposed scale of development may present risks of flooding on-site and/or off-site if surface water run-off is not effectively managed.

It should also be noted that a small area on the eastern boundary, adjacent to the Edwarebury Brook is classified as Flood Zone 3.

Footnote 20 paragraph 103 of the [National Planning Policy Framework](#) (NPPF) requires applicants for planning permission to submit a FRA when development is proposed on sites greater than 1 hectare within Flood Zone 1.

The surface water drainage plan should demonstrate that any recommendations of the local Strategic Flood Risk Assessment (SFRA) and Surface Water Management Plan (SWMP) have been considered. The plan should be carried out in accordance with the NPPF and the National Planning Practice Guidance, giving preference to infiltration over discharge to a watercourse, which in turn is preferable to discharge to surface water sewer.

Surface water runoff rates and volumes from the site must be also be managed in accordance with the [London Plan](#) (July 2011) - which sets higher standards than the [NPPF](#) for the control of surface water run-off. Policy 5.13 - Sustainable drainage (page 155) of the London Plan states that:

Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates

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and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:

- 1. store rainwater for later use*
- 2. use infiltration techniques, such as porous surfaces in non-clay areas*
- 3. attenuate rainwater in ponds or open water features for gradual release*
- 4. attenuate rainwater by storing in tanks or sealed water features for gradual release*
- 5. discharge rainwater direct to a watercourse*
- 6. discharge rainwater to a surface water sewer/drain*
- 7. discharge rainwater to the combined sewer.*

Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation.

The [Supplementary Planning Guidance](#) (SPG) on [Sustainable Design and Construction](#) provides further detail on the London Plan policies. Section 3.4.10 – on flooding states that;

All development on greenfield sites must maintain greenfield runoff rates. On previously developed sites, runoff rates should not be more than three times the calculated greenfield rate.

Reason 2: Waste

We object to the proposed development as it involves the importation and permanent deposit of half a million tonnes of waste (assuming a conversion of 2 tonnes per cubic metre) which has not been reviewed in line with the relevant policies.

The quantity of waste needed to develop such a facility has not been minimised. A reduced height development could be designed to the same quality with no importation of waste, therefore we would not regard these proposals as a recovery operation.

As this is not the recovery of waste, it should be regarded as a **waste disposal operation, i.e. a Landfill.**

This waste disposal activity should be reviewed in line with the North London Waste Plan which has not been considered.

Our objection could be removed if the activity is in line with the North London Waste Plan (NLWP) and we were to receive an Environmental Permit application for Landfill. Alternatively we could also remove the objection if a revised development plan is submitted, which involves no importation of waste and the materials balance relies on cut and fill using materials already present on site.

Informative

Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking areas for fifty car park spaces or more and hardstandings should be passed through an oil interceptor designed compatible with the site being drained.

Interceptors on surface water drainage systems must be inspected bi-annually, maintained and emptied when necessary. The interceptor must be re-charged with

water once emptied.

All cleaning and washing operations, including steam cleaning effluent, should be carried out in designated areas isolated from the surface water system and draining to the foul sewer (with the approval of the sewerage undertaker). The area should be clearly marked and a kerb surround is recommended.

The developer should consult with the Environment Agency on measures for the prevention of pollution, with particular reference to the delivery, storage and use of oils, chemicals and pesticides and the drainage of vehicle washing areas.

No construction material shall be stored in a manner that poses a risk to controlled waters.

If you have any questions please contact me on 0203 263 8054 or email me at northlondonplanning@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely

Mr Andy Goymer
Planning Advisor

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