

Claire Westwood
Three Rivers District Council
Development Control
Three Rivers House Northway
Rickmansworth
Hertfordshire
WD3 1RL

Our ref: NE/2021/133015/01-L01
Your ref: 21/0573/FUL
Date: 8 April 2021

Dear Claire,

Employment land to the North of Maple Cross Lodge, Maple Cross, Rickmansworth, WD3 9SE.

Comprehensive redevelopment to provide 2 no. Warehouse Class E(giii)/B2/B8 units comprising a total of 16,115 sqm including 1,882 sqm ancillary E(gi) office space, access, landscaping and associated works.

Thank you for consulting us on the above application on 10 March 2021.

As part of this consultation we have reviewed the following document:

- Maple Cross Contaminated Land Assessment and DQRA, prepared by H Fraser Consulting, Reference: 30422R1.5 ES, dated 2 March 2021.

Objection: Insufficient information to determine risks to groundwater

Based on the information submitted to date, **we object** to this application and recommend planning permission is refused.

The applicant has failed to provide assurance that the risks of pollution to controlled waters are acceptable, or can be appropriately managed.

Reasons

The proposed development presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is:

- Located within a Source Protection Zone 1
- Located atop a Secondary Aquifer (River Terrace Deposits) in hydraulic continuity with the underlying Principal Aquifer (Chalk)
- Located in close proximity (within 500m) to an Affinity Water potable groundwater abstraction

As the planning application is not supported by an appropriate full risk assessment, it does not meet the requirements set out in paragraphs 170 and 178 of the National Planning Policy Framework and Policy DM8 of the Three Rivers Local Plan: Development Management Policies (2013).

Cont/d..



In addition, the Thames river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. The proposal could cause deterioration of a water quality element to a lower status class of adjacent surface waterbodies and prevent the recovery of a drinking water protected area in the Mid-Chilterns Chalk groundwater body.

Overcoming our objection

We note that the submitted Contaminated Land Assessment and DQRA, dated 2 March 2021, is a summary version.

In order to fully assess the risks to controlled waters we require the full version of this report.

The applicant should provide the full version of the Maple Cross Contaminated Land Assessment and DQRA report. This should also include all modelling input files used in the controlled waters risk assessment detailed in Section 7 of this report.

Informative

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Advice to LPA

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption. We also recommend you contact your local planning authority for more information.

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Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

If you are minded to approve the application contrary to our objection, I would be grateful if you could re-notify us to explain why, and to give us the opportunity to make further representations.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

George Goodby
Sustainable Places Planning Advisor

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E-mail HNL.SustainablePlaces@environment-agency.gov.uk