

## The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

### Appeal Reference: APP/P1940/W/21/3289305

#### DETAILS OF THE CASE

Appeal Reference

Appeal By

Site Address

#### SENDER DETAILS

Name

Address

Company/Group/Organisation Name

#### ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- Appellant
- Agent
- Interested Party / Person
- Land Owner
- Rule 6 (6)

What kind of representation are you making?

- Final Comments
- Proof of Evidence
- Statement

- Statement of Common Ground
- Interested Party/Person Correspondence
- Other

**COMMENT DOCUMENTS**

**The documents listed below were uploaded with this form:**

**Relates to Section:** REPRESENTATION

**Document Description:** Your comments on the appeal.

**File name:** 210573FUL Affinity Water 310321.pdf

**PLEASE ENSURE THAT A COPY OF THIS SHEET IS ENCLOSED WHEN POSTING THE ABOVE DOCUMENTS TO US**



Three Rivers District Council  
Three Rivers House  
Northway  
Rickmansworth  
Herts  
WD3 1RL

Reference Number: 21/0573/FUL

31 March 2021

FAO Claire Westwood.

**DESCRIPTION:** 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.

**LOCATION:** Development Site Maple Lodge, Maple Lodge Close

Thank you for notification of the above planning application.

As a reminder, the proposed development site is located within an Environment Agency defined groundwater Source Protection Zone 1 (SPZ1) corresponding to our Pumping Station (SPRW) which is for public water supply, comprising a number of Chalk abstraction boreholes, operated by Affinity Water Ltd. In addition, this proposed development is within close proximity of two other Affinity Water pumping stations with the potential to adversely impact water quality for public water supply.

We objected to the first application for this development (19/1179/FUL) and also provided representation at the associated Public Hearing to present the reasons behind our objection.

Following the rejection of the initial planning application, Affinity Water have provided the developer and their consultants with a significant amount of data to inform a DQRA and Piling RAMS that has influenced the construction and piling process, and implements mitigation measures and controls to reduce any risks to public water supply during construction and post construction. In addition, we have carried out an extensive ongoing engagement during the development of these documents and have been given the opportunity to review and comment on the drafts and final versions before this application was submitted.

We acknowledge the engagement and cooperation in this process from the developer and their consultants and the subsequent changes, amendments and adjustments that have been made to the application, to address the concerns we have highlighted in our response to the previous application.

However, the risk to public water supply still remains due to the proximity of the development to our pumping stations, although we recognise these risks can be managed, providing the agreed plans are thoroughly adhered to. We request that the following Conditions are included if development consent is to be given and we emphasise the importance of regular



consultation and dialogue throughout the construction phase alongside the proposed monitoring programme, to ensure that risks to public water supply are effectively managed:

### **C12 Piling Method Statement**

Any piling or other deep foundation construction methods must be undertaken in accordance with the terms of the approved Piling Risk Assessment and Piling Method Statement dated 2 March 2021, unless details (which shall include consultation with Affinity Water) are submitted to, and approved in writing by, the Local Planning Authority.

A copy of the Piling Risk Assessment and Piling Method Statement shall be included within the package of information that forms the construction documentation for the main/and piling contractors, and kept on-site, in a position accessible to all, until the post-piling monitoring period has been completed.

The Site Manager will be responsible for ensuring that the contents and intent of the Piling Risk Assessment and Piling Method Statement are known to all persons carrying out groundworks on that site.

**Reason:** The proposed works will be in close proximity to underground sewerage utility infrastructure and the source protection zone of one or more of Affinity Water's groundwater abstractions for Public Water Supply (PWS). Piling has the potential to impact on local underground sewerage utility infrastructure in addition to contaminant transport to the Chalk aquifer (including manganese), turbidity in the Chalk aquifer and potentially at the PWS abstractions, and on ground permeability, which may affect groundwater levels and flows. This condition is necessary to protect underground infrastructure and water supply in accordance with Policies CP1 and CP8 of the Core Strategy (adopted October 2011) and Policy DM8 of the Development Management Policies LDD (adopted July 2013).

### **C19 Decommissioning of investigative boreholes**

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected (and details of the consultation undertaken with Affinity Water). The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.

**Reason:** To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in accordance with Policies CP1 and CP8 of the Core Strategy (adopted October 2011) and Policy DM8 of the Development Management Policies LDD (adopted July 2013).

### **C31 Dewatering method statement**

No dewatering shall take place. Should dewatering be necessary, no dewatering shall occur until a Dewatering Method Statement (detailing the dewatering method and predicted impact on groundwater flow and details of the consultation undertaken with Affinity Water) has been



submitted to and approved in writing with the Local Authority. Any dewatering must be undertaken in accordance with the terms of the approved dewatering method statement.

**Reason:** The proposed work will be within the source protection zone of one or more of Affinity Water's groundwater abstractions for Public Water Supply (PWS) and within 500 m of the Clubhouse/Marsh Lakes within Maple Lodge Nature Reserve. This condition is necessary to protect water supply and the environment in accordance with Policies CP1 and CP8 of the Core Strategy (adopted October 2011) and Policy DM6 and DM8 of the Development Management Policies LDD (adopted July 2013).

**Conditions to be displayed on site**

A copy of all conditions addressing groundwater protection, foundation design and site drainage, and any other groundwork or surface water matters and details submitted during the discharge of conditions, and approved pursuant and subsequent to this consent, shall be displayed at the site office at all times.

The Site Manager will ensure that the contents and intent of each are known to any persons given responsibility for operational management or control of the site, or carrying out works on that site.

**Reason:** To ensure that any potential contamination or other activity likely to pose a risk to groundwater and public water supply, is recognised, monitored and managed by all contractors on site, in good time.

Yours sincerely

A handwritten signature in black ink, appearing to read "Alister Leggatt", written over a light grey horizontal line.

Alister Leggatt  
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Asset Strategy and Capital Delivery  
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