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**From:** Sturgess, Tim (Avison Young - UK)  
**Sent:** 13 April 2022 08:10  
**To:** Maple Cross Residents Environment Group  
**Cc:** Pigott, Matthew (Avison Young - UK); Aisosa Charles; TRDC Appeals; Claire Westwood  
**Subject:** RE: Proof of Evidence

Dear Keith,

Apologies for the delay in my response I have just returned from a short period of annual leave.

The Rule 6 Party Statement of Case raised the issue of groundwater. However, the subsequent email (CD5.15) suggested that groundwater would not be an issue. This was my understanding of the Rule 6 Party Case at the time the proof was prepared. Whilst we are disappointed that groundwater appears to remain an issue despite the consensus of technical professional evidence, we will respond to the points in our oral evidence.

I trust this provides appropriate clarification in advance of the event.

Regards

**Tim Sturgess**

Director

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**From:** Maple Cross Residents Environment Group <maplexresidentsenvironmentgrp@gmail.com>  
**Sent:** 08 April 2022 13:02  
**To:** Sturgess, Tim (Avison Young - UK) <Tim.Sturgess@avisonyoung.com>  
**Cc:** Pigott, Matthew (Avison Young - UK) <Matthew.Pigott@avisonyoung.com>; Aisosa Charles <aisosa.charles@planninginspectorate.gov.uk>; TRDC Appeals <trdc.appeals@threerivers.gov.uk>; Claire Westwood <claire.westwood@threerivers.gov.uk>  
**Subject:** Proof of Evidence

**CAUTION: External Sender**

Dear Tim

I'm afraid we do not understand the following paragraph in your Proof of Evidence:

*5.20 The Statement of Case must set out the full particulars of the case. The impact on groundwater and any consequential impacts to the nature reserve do not, therefore, form part of the Rule 6 Party's objection.*

When our Statement of Case states:

*7.2.1 The proposed project may have an adverse effect on the quality or quantity of groundwater flowing into the reserve and the protected Section 41 Groundwater Dependent Terrestrial Ecosystem habitats within.*

We also refer to the impact on groundwater and consequential impacts here:

*7.2.6 No mitigation has been proposed by the Appellant in the event that their activities do have an adverse effect on the quality or quantity of groundwater, causing potential harm to either of the two reserves' Section 41 habitats.*

We would appreciate clarification of your comments in order to eliminate any misunderstanding.

Kind regards,

Keith Pursall  
Chairman  
Maple Lodge Conservation Society