July 2019

Dear Ms Westwood

## Re: application 19/1179/FUL



The Colne Valley Park CIC exists to maintain and enhance the Colne Valley as the first taste of countryside to the west of London for the benefit of more than three million people who live within 10 miles of the Park. The Park covers an area from Rickmansworth to Staines, across parts of Herts, London, Bucks, Berks and Surrey. The six objectives of the Park are:

- 1. To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.
- 2. **To safeguard the countryside** of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
- 3. **To conserve and enhance biodiversity** within the Park through the protection and management of its species, habitats and geological features
- 4. To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
- 5. **To achieve a vibrant and sustainable rural economy**, including farming and forestry, underpinning the value of the countryside.
- 6. **To encourage community participation** including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.

The whole of application site 19/1179/FUL is located within the Colne Valley Regional Park. We note that this site, although previously undeveloped green space, is not Green Belt and is in the local plan as an employment site.

The designation of the majority of the site as flood zone 1 may not have taken local circumstances into account: The area just the other side (east) of the loop road that serves the Sewage works from A412 used to belong to Thames Water and housed the sewage drying beds before they were dug out along with the underlying gravel. In that process two large surface water mains that fed into the Thames pumping station were broken through. Regular flooding in that area during heavy rain events since that time suggests adequate repair or re-routing has never been undertaken thus allowing the storm water to simply flow from mains that are not terminated. The outcome is that for much of the time that loop road and the proposed development site are severely impacted.

Maple Lodge Nature Reserve is referenced and quoted quite extensively in the planning application documentation, but we are disappointed to hear from the Maple Lodge Conservation Society that the applicants have not contacted it. In our view this is a serious omission, and we hope the MLCS's views on the application will be

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sought and given proper consideration. The impact on Maple Lodge Nature Reserve from reduced flow into the watercourse that feeds their lakes is severe. We are also deeply concerned about the implications of pumping water across the Colne into Springwell Lake.

We are deeply concerned about the cumulative impacts of many developments within the Colne Valley Regional Park. In this instance, the particular contributions of this development are:

- The unresolved issues of localised flooding due to the broken pipes
- Impact on Maple Lodge Nature Reserve and Springwell Lake.
- Loss of openness that detracts from adjacent green belt sites
- Loss of green space and biodiversity with measurable net gain for biodiversity not demonstrated
- Little information on mitigation

The Colne Valley Park CIC therefore objects to this application

If the council is minded to approve this or any subsequent applications on this site, we strongly urge that conditions should be imposed to ensure mitigation through S106, or other appropriate means, to deliver the objectives of the Colne Valley Regional Park for the benefit of local residents and wildlife in the area around the site including Maple Lodge Nature Reserve, Maple Lodge Marsh, Rickmansworth Lakes Circular Walk (around Springwell Lake) and the River Colne.

Yours sincerely

Stewart Pomeroy Managing Agent

For and on behalf of the Colne Valley Park Community Interest Company

Cc Maple Lodge Conservation Society