Claire Westwood

Three Rivers District Council

March 2021

Dear Claire



## Re: application 21/0573/FUL Warehouses Maple Cross

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.

The designation of the majority of the site as flood zone 1 may not have taken local circumstances into account: There are regular flooding problems along the loop road and the proposed development site.

We support the comments made by the Herts & Middlesex Wildlife Trust in their letter dated 26<sup>th</sup> March about evidence of biodiversity value of the site, need for survey at the optimal time of year and concerns about how biodiversity net gain has been measured.

The public path around Springwell Lake, a designated Site of Importance for Nature Conservation is popular with walkers, bird watchers and fishermen who enjoy the tranquil natural habitat **and the countryside/green setting** of this site which will be compromised by this development just 200m away that will result in visual, light and noise intrusion. Effects will also be felt at other nearby wildlife sites of Maple Lodge

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Marsh and Maple Lodge Nature Reserve. This is in contravention to two TRDC Local Plan Policies:

DM7 "b).....the Council will require proposals to make a positive contribution to the surrounding landscape. Proposals that would unacceptably harm the character of the landscape in terms of siting, scale, design or external appearance will be refused planning permission...."

DM9."...d) Planning permission will not be granted for development which:..... ii) Has an unacceptable adverse impact on countryside areas of tranquillity which are important for wildlife and countryside recreation....e) Development proposals which include external lighting should ensure that:....ii) There is no unacceptable adverse impact on neighbouring or nearby properties iii) There is no unacceptable adverse impact on the surrounding countryside....vi) There is no unacceptably adverse impact on wildlife vii) Proposals in the vicinity of habitats and habitat features important for wildlife ensure that the lighting scheme is sensitively designed to prevent negative impacts on use of these habitats and habitat features."

We do not believe the cumulative impact of development is properly being addressed. In the Colne Valley Regional Park local residents are subject to many proposals in a small area, including High Speed 2, two Motorway Service Areas, Heathrow expansion, a huge screen hub, multiple housing developments/removals from the green belt in current and forthcoming local plans. Individually and collectively these will fundamentally change the character of the area with no proper joined up planning and insufficient mitigation from each development.

## The Colne Valley Park CIC therefore objects to this application

If the council is minded to approve, or it is subsequently approved upon appeal, we strongly urge that conditions are imposed to ensure mitigation 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, Woodoaks Farm, Rickmansworth Lakes Circular Walk, Springwell Lake and the River Colne. The S106 from the previous development of a few thousand pounds for biodiversity and a travel plan are tiny when compared to the statistics of economic benefit quoted in section 9.3 of the planning statement. We point out that there are three pillars of sustainability and that Economic considerations should not trump Social or Environmental considerations. If approved, a development of this scale and supposed economic benefit must provide more for the benefit of the local community and local landscape that are forced to host it. In the event of the application being approved we invite the applicant to discuss suitable mitigation with us to be delivered through a s106 or other suitable agreement.

Yours sincerely

S.Pomeroy

Stewart Pomeroy Managing Agent

For and on behalf of the Colne Valley Regional Park

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