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## **Response to the Chiltern and South Bucks Local Plan 2036 and Sustainable Appraisal of the Chiltern and South Bucks Local Plan**

**From The River Chess Association**

### **PERSONAL DETAILS**

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### **Comment**

1. Introduction
2. Engagement with Water Companies
3. Water Supply
4. Sewage Treatment Infrastructure
5. Road, Urban and Agricultural Runoff
6. Chess Valley Green Belt Under Threat
7. Summary Conclusions

#### **1. Introduction**

This response sets out a number of comments we believe should be addressed in the ***Chiltern and South Bucks Local Plan 2036***.

The River Chess Association was established in 2009 as a response to repeated pollution incidents in the River Chess. We have 10 committee members representing local landowners and businesses, farmers, environmental groups, academics and residents. We have a strong local support group including teams of volunteers looking at riverfly, flow rates and water quality data gathering.

The River Chess is a chalk stream that rises in Chesham in Buckinghamshire and runs through the Chess Valley to Rickmansworth, where it becomes a tributary of the Colne.

The Chess Valley is part of the Chilterns Area of Outstanding Natural Beauty and partly falls in Chiltern District Council, of which chalk streams are a characteristic feature. The Chess is home to a variety of important wildlife, such as water voles, brown trout, migrating ospreys, green sandpipers and stream water crowfoot. This scenic river is enjoyed by walkers, fishermen, photographers, wildlife enthusiasts and has become an important destination for educational field trips for thousands of children every year.

The Chess faces many threats, including low flows caused by abstraction for the public water supply, sewage discharges, road, urban and agricultural pollution and invasive species such as North American mink and Japanese knotweed. For these reasons the River Chess Association was formed to protect and enhance the River Chess for future generations.

While we appreciate that there is a need to increase housing through this Local Plan we wish to ensure that it does not have a detrimental impact on the River Chess. The fundamental and most pressing issue for the Chess is low flow due to changes in rainfall patterns and increasing abstraction for domestic supply. The supply of water in Chiltern District comes almost exclusively from groundwater, which comes from the same source that supplies the Chess, particularly the upper Chess around Chesham. So any increase in demand from new housing will have a detrimental impact on flows in the Chess. It is therefore a requirement that the Local Plan through the water companies investigates and secures water supplies from alternative sources.

We strongly believe that the Local Plan should contain a statement with respect to the River Chess and the neighbouring River Misbourne that confirms their importance and indicates a commitment of the District Councils to protect them.

***“Within the boundaries of South Bucks and Chiltern District Council we are fortunate to have two significant chalk rivers, the River Misbourne and River Chess. These vulnerable habitats are globally rare, supporting endangered species and deserve protection and support. South Bucks and Chiltern District Council undertake to ensure that nothing in our Local plan will be detrimental to these rivers and we will do all that is possible to protect and enhance these important ecosystems.”***

## **2. Engagement with Water Companies**

Overall the Local Plan does not address infrastructure issues in details especially the key areas of water and wastewater management

We understand that there is a need to increase the housing stock in Chiltern District but are keen to ensure that this is done in way that does not have a detrimental affect on the Rivers Chess. We therefore encourage Chiltern District to engage with both Thames Water and Affinity Water to investigate alternative sources of water to meet existing and incremental demand resulting from this plan. Thames Water operate sewage management and processing within Chiltern District. Affinity Water are responsible for supplying drinking water for the District. In addition Thames Water abstract water from the aquifer underlying Chiltern District for supply elsewhere. Only through dialogue with these water companies will we ensure the River Chess is not subject to further stress and deterioration in quality.

## **3. Water Supply**

Water supply is flagged at various points in the Local Plan but as yet we cannot see any indication as to how this issue is going to be resolved without doing further harm to the River Chess.

The Chess catchment is over abstracted and any increase in water demand coming from new housing needs to come from alternative sources. We also believe that abstraction needs to be reduced from current levels, if this does not happen we will continue to see frequent river drying events in Chesham as we did in 2011, 2012, 2015, 2016, 2017, 2018, and 2019. The drying event in 2015 caused thousands of fish to be killed and the almost complete disappearance of invertebrates in the river, in more recent drying events there was no evidence of fish in the river as there has been insufficient flowing water for the ecosystem to recover.



***Fish Kill Water Lane, Chesham 30<sup>th</sup> September 2015***



***Dry River Bed, Water Lane 30<sup>th</sup> September 2015***

We are working on a joint study with the Environment Agency, Buckinghamshire County Council and the Water Companies to address this problem. The Upper Chess Low Flow Study has established that abstraction is having a detrimental impact on flows in the Chess. In their latest Business Plans and Water Resource Management Plans both Affinity and Thames have provided for shutting down abstraction from Chesham, Chartridge and Hawridge in the

AMP period 2020 to 2025. ***This must be highlighted and provided for in the in Local Plan as it places a constraint on water use and the ability to build new houses.***

#### **4. Sewage Treatment Infrastructure**

There is very little in the Local Plan that addresses the key issue of sewage treatment capacity and efficiency in the Chesham area, this often directly impacts on the River Chess.

**Policy DM NP6** We strongly support DM NP6 (River Character and Water Environment) and would like to see the importance of chalk streams spelled out in detail. We are disappointed that the accompanying Water Quality Assessment document does not once mention the River Chess. The mention of the Chesham Wastewater Treatment Works, which is situated on the Chess and which can have profound impact on the water quality of the river, is only referred to obliquely as coming under the Hertfordshire Water Quality Project. As half the Chess and the most critical section lies in the Chiltern District this is a grave omission from the Local Plan.

The Chesham Sewage Treatment Works has a history of failing to cope with demand let alone any increase from new housing. Thames Water have been working on improving the reliability of this plant and so far the results are positive. However as yet the system has not been fully tested as we have experienced extremely low groundwater levels for the past 3 years. We still remain cautious and suspect that any increase in demand will put stress on the system, which could lead to failure and pollution.

During 2013 there were a number of catastrophic equipment and procedure failures at the Chesham STW resulting in sewage flooding adjacent properties and being discharged into the River Chess. In 2014 the Chesham STW was unable to cope with throughput and discharged sewage into the River Chess for four months from February to June. The volume of sewage discharged during this period was equal to the amount of oil spilt by BP in the Gulf of Mexico.

We need to see clear detailed provisions in the Local Plan as to how demand for water and sewage processing will be met.

If water supply and sewage processing is not addressed we will be back to the old standby solution. We need to supply water then we allow the river to dry up, already happening, if the Sewage Treatment Works cannot cope then we dump the excess in the river.

#### **5. Road, Urban and Agricultural Runoff and Reducing the Risk of Pollution**

*9.7 Natural – Chesham Flood Alleviation*

*9.8 Natural – Flood Protection and SuDS*

*9.9 Natural – Reducing the Risk of Pollution*

Over recent years the drainage issues in Chesham and along the Chess Valley have created a number of pollution points. New pollution points are being created and nothing is being done to protect the River Chess. We are trying to resolve existing pollution points while the planners appear to ignore them and the new ones that are being created.

Urban, agricultural and road runoff continues to be a problem on the Chess. This river should be a crystal clear river from headwater to the confluence with the Colne at Rickmansworth, increasingly this is not the case. The river is used as an extension or default for the urban drainage system, this introduces significant volumes of sediment and pollutants.

**Policy DM NP7** We encourage the rerouting and deculverting of the Vale Brook to reduce flood risk, tackle the integrity of the existing buildings on the High Street, improve water quality and generate public connection to this important tributary of the River Chess, it should be a priority of the Local Plan.

**Policy DM NP8** The Local Plan should address the already existing specific need for sustainable urban drainage (SuDS) not just focusing on flood risk but including the current pollution problems, without this new housing will increase the pollutants making their way into the Chess. It is also clear that the existing drainage systems needs to be properly maintained and a commitment to this should be a key feature in the Local Plan.

**Policy DM NP9** There are no actions to cover reducing the existing issue of frequent water pollution incidents in the Chess that happen every time there is moderate rainfall in Chesham.

## **6. Chess Valley Green Belt Under Threat**

### *10.1 Metropolitan Green Belt within Chiltern and South Bucks*

We would resist any lifting of Green Belt Status as part of this plan. We wish to reiterate and remind you the purposes of the Green Belt.

Purpose 1: To check unrestricted sprawl of large built-up areas.

Purpose 2: To prevent neighbouring towns merging into one another.

Purpose 3: To assist in safeguarding the countryside from encroachment

Purpose 4: To preserved the setting and special character of historic towns

## 7. Summary Conclusions

### **Engagement with Water Companies**

We would like to see the establishment of a formal forum where the water companies and the District Council planners meet with stakeholders to ensure water supply and sewage treatment issues are addressed.

### **Water Supply**

We would like to see a commitment in the Local Plan supporting the reduction of abstraction in the Chess Catchment in order to reduce low flow and drying events in the River Chess.

### **Sewage Treatment Infrastructure**

Ensure Thames Water are made aware of plans that will impact on the Chesham Sewage Treatment Works

### **Road, Urban and Agricultural Runoff**

We would like to see detailed sustainable road and urban drainage plan included in the Local Plan to address existing issues and cope with new housing.

### **Green Belt Under Threat**

While appreciating that there are new housing requirements encroachment on Green Belt should be resisted.

### **Statement of Commitment by Chiltern and South Bucks District Council**

*“Within the boundaries of South Bucks and Chiltern District Council we are fortunate to have two significant chalk rivers, the River Misbourne and River Chess. These vulnerable habitats are globally rare, supporting endangered species and deserve protection and support. South Bucks and Chiltern District Council undertake to ensure that nothing in our Local plan will be detrimental to these rivers and we will do all that is possible to protect and enhance these important ecosystems.”*

### **Further Specific Comments**

#### **Sustainable Appraisal of the Chiltern and South Bucks Local Plan May 2019**

**Table N2, 12 Increased pressure on ecosystem services.** There is no mention here that the Local Plan as written will lead to reduced flows in River Chess, negatively impacting on this globally rare ecosystem.

**13 Water, Box 13.1 2 Water Demand** While it is clear that in the Colne and Thames Catchment there “is no water available for licencing” this does not take into account headroom in existing licences. If this headroom is utilised due to the impact of increased housing in the Local Plan it will have a detrimental impact on flows in the rivers.

**13 Water, Box 13.2 Water pollution.** With the current water supply infrastructure using groundwater any development will adversely affect flow potential and water quality of rivers. We have to assume that Policy DM NP6 will

stop any new housing until alternative non-groundwater supplies are put in place. Not sure how the *Residual impact?* can be assessed as *Minor Negative*.

**13 Water, Box 13.2 Increased stress of water resources.** Any new housing will increase demand in an already water stressed area, be it at the target level of 110 litres per person per day or the current level of 182 litres per person per day. Not sure how the *Residual impact?* can be assessed as *Minor Negative*, it is a Major Negative. Increased demand anywhere between 1.1 mega litres per day to 3.7 mega litres per day.

**13 Water, Box 13.2 Ecosystem Services.** The provision of new habitat, how do you assess net gain, sacrifice a globally rare chalkstream for a newly planted hedge. You would have to plant a lot of hedge. A Major Negative. We have an obligation to maintain chalkstreams for stakeholders well beyond the boundaries of Chiltern District and South Bucks.

### *Chiltern and South Bucks Local Plan Response August 2019*

*In submitting comments to this consultation we are required, under the Town and Country Planning (Local Planning) (England) regulations 2012, to notify you when the independent examination will take place. We will use the contact details you have provided to do this.*

*Please note:*

*At the end of the consultation period all comments will be made public and will be submitted to the Secretary of State along with the Local Plan and other relevant supporting documents. Your comments and name will be published but other personal information will remain confidential.*

*Your comments will be reviewed by the Independent Planning Inspector appointed by the Secretary of State to carry out the Examination in Public. You may be invited to discuss your comments at the Examination in Public at the discretion of the Inspector.*

*In line with General Data Protection Regulations (2018), your details are stored on a secure system and are used only for the purposes of consultation for the Local Plan and associated documents.*

*Your details will be stored until such a Time that the Local Plan has been adopted.*

*If you do not wish to receive any further updates from the Council in relation to the Local Plan, please email us.*

*Please tick below to indicate you have read this notice*

*I have read the notice about how my information will be used*

*(The answer to this question will never be displayed to the public)*