

River Chess Association Response to the Second Draft of the Chiltern District Core Strategy Document 26 Oct 2010.

4. Please give details of why you consider the Core Strategy not legally compliant or unsound.

The River Chess Association responded in detail to the previous draft of the Core Strategy on 21 April 2010, many of the comments made in that response still remain valid. There are two key issues relating to the effect of the Core Strategy on the River Chess; they are water flow rates and water quality.

Background

We are a recently formed association including groups and individuals who are focused on representing the interests of the River Chess. We work closely with other groups in the area who are working on issues relating to the Chess, including the Chilterns Chalk Stream Project, Impress the Chess, the Chiltern Society and the Chesham Environmental Group.

The River Chess is a chalk stream that rises in Chesham, Buckinghamshire, and runs through the Chess Valley to Rickmansworth where it becomes a tributary of the Colne. For part of its length it forms the border between Buckinghamshire and Hertfordshire. Chalk streams are a rare ecosystem. We have 85% of the world's chalk streams in England. In the words of the World Wildlife Fund for Nature from their Rivers on the Edge initiative "Chalk Streams are our Rain Forest". We must take responsibility to ensure these fragile environments are protected and not lost.

The Chess Valley is part of the Chilterns Area of Outstanding Natural Beauty and the river is home to a variety of important species, such as water vole, kingfisher, brown trout and stream water crowfoot. Interesting visitors, such as osprey, also come to the river. The picturesque Chess is popular with walkers, thanks to the Chess Valley Walk, and is also home to a watercress farm at Sarratt and trout fisheries.

The Chess faces many threats, including low flows caused by abstraction for public water supply, invasive species such as mink and Japanese knotweed, and sewage discharges.

The Association carries out environmental monitoring, raises awareness of the issues facing the Chess, educates people about the importance of chalk streams, interacts with educational institutions and lobbies the appropriate authorities and provides a forum for the exchange of expertise and ideas.

Water Flow Rates in the River Chess

The key point in the Core Strategy is

14.16 “Where a proposal generates the need for abstraction, these will only be permitted where this does not cause over abstraction” This is the key to the problem of low flow rates for the River Chess. The Chiltern District is already designated as an over-abstracted area. Any new housing will cause further over abstraction, which means no new housing until the over abstraction is resolved.

Other key areas we see that need to be addressed in the Core Strategy for Chiltern District relating to water flow rates in the River Chess:

- Establish an Abstraction Working Group including Chiltern District, Veolia, Thames Water, and voluntary bodies such as the River Chess Association and others. This group should be tasked with establishing a plan to reduce requirements to abstract from the chalk aquifer in the Chilterns and specifically the Chess Catchment.
- For existing consumers we see that the areas to concentrate effort are the increased use of smart water meters and grey and rain water collection schemes.
- With regard to all new developments there should be an imperative that minimisation of water use is a key component of any plan.
- All new developments should be sited in locations that minimise their impact on the River Chess.

Water Quality in the River Chess

Key areas we see that need to be addressed in the Draft Core Strategy for Chiltern relating to water quality in the River Chess are:

- A detailed assessment of the additional sewage throughput expected at the Blackwell Hall Lane plant resulting from the implementation of Draft Core Strategy for Chiltern, specifically the new housing.
- Acceptance that the River Chess chalk stream is a rare ecosystem that requires a greater duty of care from Thames Water.
- A coordinated water monitoring plan working with the Environment Agency and voluntary bodies such as Impress the Chess, ourselves and others.
- The number of sewage discharges into the River Chess should be reported and recorded by Chiltern District Council as an indicator for measuring the success of infrastructure provision.

- A detailed plan and cost estimate of how the Blackwell Hall Lane plant can be upgraded and expanded to improve water quality and treatment capacity.

The detailed comments are as follows:

Section 8 Developing and Living Sustainably

Paragraph 8.6 It is good to see that measures are to be undertaken that will reduce emissions of pollutants and reduce water consumption. This will assist with the two main concerns for the River Chess, being water quality and flow rates.

Table 1 Sustainable Principles for the Chiltern District

Point (h) it is good to see a target of household consumption for new buildings of 125 litres per day per person, which is an excellent target but there is no mention of ways of reducing consumption in existing housing. The average per capita consumption of water in Chiltern District is 176lt per day on an un-metered basis and 160lt per day on a metered basis which compares with a national average of 148lt per day metered and un-metered and a best in class (Severn Trent) of 128lt per day. This shows that there is potential within Chiltern District for a minimum 8% reduction in demand just through the introduction of compulsory metering. If additional measures such as informing and educating people on water use could be introduced we would see a substantial drop in consumption reducing the low flow problems experienced by the chalk streams in the Chiltern District.

Section 14 Looking After the Natural Environment

Paragraph 14.3 “(Note: it is intended that the above indicators be measured by the Chilterns AONB team, with information at District level) What funds and resources are being made available to meet this requirement. Assistance can be provided by local voluntary groups.

14.10 The “Environment Agency, riparian landowners and other partners have been working to protect the rivers.” A mechanism and forum should be established to co-ordinate this activity.

14.12 Who will co-ordinate this measurement of success “Working closely” is a vague concept more structure is needed.

14.16 “Where a proposal generates the need for abstraction, these will only be permitted where this does not cause over abstraction” This is the key to the problem of low flow rates for the River Chess. The Chiltern District is already designated as over an abstracted area. Any new housing will cause further over abstraction, which means no new housing until the over abstraction is resolved.

Appendix 7: Draft Infrastructure Delivery Schedule (Utilities)
Core Strategy for Chiltern District | Publication Document

See below table on provision of sewage treatment.

It is good to see Thames Water have conceded that “infrastructure is operating at or near capacity” and “provided that the development makes appropriate provision for sewerage ” We need the following information relating to this point:

- A detailed assessment of the additional sewage throughput expected at the Blackwell Hall Lane plant resulting from the implementation of Draft Core Strategy for Chiltern, specifically the new housing.
- A coordinated water monitoring plan working with the Environment Agency and voluntary bodies such as Impress the Chess, ourselves and others.
- The number of sewage discharges into the River Chess should be reported and recorded by Chiltern District Council as an indicator for measuring the success of infrastructure provision.
- A detailed plan and cost estimate of how the Blackwell Hall Lane plant can be upgraded and expanded to improve water quality and treatment capacity.

5. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.

Section 14

Over Abstraction (Low Flows in Rivers)

Key areas we see that need to be addressed in the Core Strategy for Chiltern District relating to water flow rates in the River Chess:

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- For existing consumers we see that the areas to concentrate effort are the increased use of smart water meters and grey and rain water collection schemes.
- With regard to all new developments there should be an imperative that minimisation of water use is a key component of any plan.
- All new developments should be sited in locations that minimise their impact on the River Chess.

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With respect to the provision of sewage treatment:

It is good to see Thames Water have conceded “infrastructure is operating at or near capacity” and “provided that the development makes appropriate provision for sewerage” We need the following information included relating to this point

- A detailed assessment of the additional sewage throughput expected at the Blackwell Hall Lane plant resulting from the implementation of Draft Core Strategy for Chiltern, specifically the new housing.
- A coordinated water monitoring plan working with the Environment Agency and voluntary bodies such as Impress the Chess, ourselves and others.
- The number of sewage discharges into the River Chess should be reported and recorded by Chiltern District Council as an indicator for measuring the success of infrastructure provision.
- A detailed plan and cost estimate of how the Blackwell Hall Lane plant can be upgraded and expanded to improve water quality and treatment capacity.

Yes - I wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We represent the River Chess Association, who are a voice for groups who rely on the river for their livelihoods and recreation. It is a valuable asset to Chiltern District and could be badly impacted by the Core Strategy. We feel that the River's interests would be best served if we could deliver our response in person.

Extract from the Core Strategy document.

Core Strategy for Chiltern District | Publication Document

Infrastructure Requirement (to 2026)	Explanation	Required as a result of Draft Core Strategy	Indicative Delivery Timetable	Lead Partner	Estimated Funding	Funding Source and Mechanism
Reinforcement of existing sewerage network and increasing existing sewerage	Thames Water has identified that a large section of Chiltern District's sewerage infrastructure is operating at or near capacity. Many of the locations where new	Yes	2011 onwards	Thames Water	Thames Water has not provided Chiltern District Council with	Funded by developer through direct agreement with Thames

management capacity	<p>housing developments are likely to be located are known areas of sewerage infrastructure stress.</p> <p>Thames Water does not object to total amount of housing being proposed in the District and is of the view that new development can come forward in areas of existing sewerage infrastructure stress provided that the development makes appropriate provision for sewerage and surface water infrastructure improvements.</p>				information relating to how much the sewerage infrastructure improvements are going to cost.	Water
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