Hampshire & Isle of Wight Wildlife Trust

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Deputy Prime Minister and Secretary of State for Housing,
Communities and Local Government
The Rt Hon Angela Rayner MP
Ministry of Housing, Communities and Local Government
2 Marsham Street
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13 November 2024

CC: Secretary of State for Food, Environment and Rural Affairs, Rt Hon Steve Reed OBE MP
CC: Minister of State, Matthew Pennycook MP

Re: Planning Reform must help save our chalk streams

Dear Deputy Prime Minister,

As Chief Executives of leading environmental organisations, we call on the Government to seize the opportunity of the current planning reforms to support its commitment to protecting and enhancing our precious chalk streams.

Chalk streams are among the most biodiverse and ecologically significant freshwater ecosystems in the world, yet they remain exceptionally vulnerable to pollution, over-abstraction, and habitat degradation. While we welcome the Government's launch of an Independent Commission into the water sector, we recognise that more urgent action must be taken to protect our chalk streams. Last year, polluting effluent flowed for a total of 10,901 hours into Hampshire's Test and Itchen, 32,577 hours into Wiltshire's Avon and 3,591 hours into Berkshire's Kennet.

In light of the ongoing degradation of our precious chalk streams, we urge the Government to utilise the opportunity of its planning reforms to designate chalk streams and their catchments with a bespoke protection, integrated within the National Planning Policy Framework. This protection should tackle direct harm and wastewater pollution through a legally protected status, as highlighted in the CaBA Chalk Stream Restoration Strategy. Our suggestions for recommended changes to the NPPF to action can be found here. Fundamentally, planning policy must:

Prohibit direct harm

- Designate chalk streams and their associated riparian habitats as **irreplaceable habitats**.
- Set clear guidelines on permissible activities within catchments, through the introduction of a **50-100 metre 'no development' buffer zone**.

Tackle wastewater pollution

- Mandate local planning authorities to take account of implications for **water resources and sewerage systems of major housing developments** in their Local Plans and proposal reviews.
- As per the recommendations of the Office for Environmental Protection (OEP), DEFRA must issue guidance to public authorities on delivering Environmental Objectives and strengthen wording on the implementation of **Water Framework Directive Regulations**. This must encourage investment in

nature-based solutions and mitigation, including through nutrient neutrality and biodiversity net gain.

We are concerned to hear recent reports that the Chalk Stream Recovery Pack has been abandoned. In addition to delivering protections for chalk streams through planning reform, the new Government must urgently **release an improved version of the 'Chalk Stream Recovery Pack'**, promised under the previous government, to provide clarity on its plan for chalk streams. This action plan must be decisive and ambitious, outlining a specific designated protection for chalk streams, offering enhanced legal protections, strengthened enforcement mechanisms and immediate investment in restoration and conservation.

We stand ready to support the implementation of these measures and to work collaboratively to support the recovery of our chalk streams. See the **attached briefing** for more information. If you would like to set up a meeting to discuss this with us in detail, please email Lorna Selby, at lorna.selby@hiwwt.org.uk.

Thank you for your attention and I look forward to hearing from you.

Your sincerely,

Debbie Tann MBE, Chief Executive, Hampshire and Isle of Wight Wildlife Trust
Estelle Bailey, Chief Executive, Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust
Eliot Lyne, Chief Executive, Norfolk Wildlife Trust
Joanna Lewis, Chief Executive, Wiltshire Wildlife Trust
Joan Edwards OBE, Director of Policy and Public Affairs, The Wildlife Trusts
James Wallace, Chief Executive, River Action
Charles Rangeley-Wilson, Chair, CaBA Chalk Stream Restoration Group
Jamie Cook, Chief Executive, Angling Trust
Charlotte Hitchmough, Director, Action for the River Kennet
Shaun Leonard, Director, Wild Trout Trust
Tom Beeston, Chief Officer, The Chiltern Society
Mark Lloyd, Chief Executive Officer, The Rivers Trust
Anna Daroy, Chief Executive Officer, The Chartered Institution of Water and Environmental Management
Sarah Perry, River Catchment Coordinator, Hertfordshire and Middlesex Wildlife Trust
Dave Rumble, Chief Executive, Wessex Rivers Trust

The Problem: Our Chalk Streams are Suffering

We need urgent action to protect our precious chalk streams.

Less than a fifth of England's rivers, including chalk streams, are in good ecological health and none are in good chemical health.

Chalk streams are rare and biodiverse rivers that rise from chalk bedrock, characterised by clear waters and a rich variety of life. They are habitats for key species including water voles, Atlantic salmon and brown trout.

With 85% of the world's chalk streams found in England, several of which are located across our counties, these globally rare and endangered habitats must urgently be granted the unique protection they deserve.

Why are our chalk streams in such poor health?

The health of chalk streams is heavily influenced by activities across their catchments. New development adjacent to chalk stream catchments can place significant pressure on the river, with consequences for water quality and pollution levels.

- Direct harm: New development that interferes with the channel or floodplains associated with the chalk stream and its surrounding riparian habitat. This includes concreting over floodplains and diverting the natural river channel.
- Urbanisation: Development pressures within or adjacent to chalk catchments place an increased risk of over-abstraction on these rivers. This may exacerbate existing unsustainable abstraction, leading to reduced water levels, declines in oxygen levels and stress to native species. Prolonged over-abstraction, paired with increased drought, can be detrimental to these unique ecosystems and the species which rely on them.
- Wastewater pollution: Sewage and domestic wastewater outflows, agricultural fertilizer runoff and pollution from highways can all add new chemicals into streams which interfere with natural processes that keep the water clean and healthy.
    - Sewage: In 2023, widespread sewage overflows released effluent for thousands of hours into chalk streams across our counties, including Hampshire's River Itchen, Wiltshire's River Avon, Norfolk's River Glaven and Buckinghamshire's River Wye.[1]
    - Phosphates: Across chalk streams, almost half of phosphates come from Sewage Treatment Works. Increased phosphates lead to eutrophication, which have damaging implications for water quality and biodiversity.

A review by the Office for Environmental Protection earlier this year highlights the critical failures to appropriately regulate and implement measures to meet environmental targets set out for waterbodies through the Water Framework Directive. A bespoke protection is required to protect these unique habitats. We believe that urgent, ambitious action is essential to ensure their long-term health and enhance valuable ecological services

Do any chalk streams currently have legal protections?

Currently, only 11 out of 220 British chalk streams have a legal protection as a Site of Special Scientific Interest (SSSI), and only 4 have protection as a Special Area of Conservation (SAC).

Despite even these very limited protections, our chalk streams continue to suffer from chronic pollution issues, much like all other rivers in the UK. Status as an SSSI or SAC does not provide the appropriate protection that chalk streams need, as these fragile habitats are heavily influenced by activities across their catchments. This means any protection must be bespoke and catchment-wide to truly put our chalk streams into recovery, as suggested in the CaBA Chalk Stream Restoration Strategy.[2]

Solutions for Government

We urge the Government to utilise the opportunity of its planning reforms to **designate chalk streams and their catchments with a bespoke protection, integrated within the National Planning Policy Framework (NPPF)**.

Over 700 people recently joined us in calling for greater protections for chalk streams in the recent NPPF consultation. But we need help to ensure these concerns are heard. We recommend that the Government:

- Deliver long-awaited updates to the list of **irreplaceable habitats**, to include chalk streams and their associated riparian habitats.
- Implement a **50-100 metre 'no development' buffer zone** along the riparian corridor, as recommended by Natural England's recommendations for vulnerable habitats.
- Mandate Local Planning Authorities to take account of implications for water resources and sewerage systems of major housing developments in their Local Plans and proposal reviews.
- As per the recommendations of the OEP, DEFRA must issue guidance to public authorities on delivering Environmental Objectives and strengthen wording on the implementation of **Water Framework Directive Regulations**. This must encourage investment in nature-based solutions and mitigation, including through nutrient neutrality and biodiversity net gain.
- Publish the delayed **Chalk Stream Recovery Pack.** The Pack was being prepared by DEFRA, prior to the election, but it has still not been published. The new Government must publish the pack urgently.
- Introduce **phosphate limits** as a permit condition of all sewage treatment works in chalk stream catchments. Water companies should plan upgrades that deliver the greatest ecological improvements, helping to upgrade smaller works in the rural headwaters, rather than simply focussing on the biggest reduction in nutrient load.

These planning changes are an essential first step but must be supported by a suite of measures to drive implementation. These include mandating parallel investment in water infrastructure for new developments, introducing sustainable drainage system within chalk catchments, and raising water efficiency standards within 'water-stressed' chalk catchments to a more ambitious minimum of 90 litres per person per day.