

# Getting Involved in Planning to Support the Protection of Chalk Streams

Getting involved in planning to raise concerns about the health of chalk streams and to be heard can be a challenging prospect. We have prepared this advice to help those who want to raise those concerns. It is intended to be an introduction to what is a complex topic and to provide some broad guidance on how to get involved.

## Background

The cornerstone of the planning system is the need to get approval for the use of land and buildings, with some exceptions. In considering applications, a local planning authority's decision should be made in accordance with the policies in their local plans unless there are other planning considerations to do otherwise.

The public have to be consulted on both the preparation of local plans and planning applications. Given the importance of the local plan, if you can, get involved in its preparation and influence what it has to say about the natural environment and in particular chalk streams.

## Local Plans

### Influencing the Local Plan

The public have an opportunity to influence the content of local plans and their policies through the consultation process. We suggest that;

- When your local planning authority announces it is preparing a new plan, sign up to be kept informed of progress so that you won't miss opportunities to make comments
- At each public consultation stage, raise your concerns regarding chalk streams and if necessary set out your reasons why the plan is not doing enough to protect them
- If there are opportunities to contribute to discussion groups, then sign up
- Seek the support of your local councillor and parish council if there is one, and provide them with information in support of your case
- Attend any forums where local councillors meet to discuss planning issues and raise your concerns
- In responding to each consultation, wherever possible, support your case with as much information as possible
- Encourage others to get involved
- Find and work with other organisations who have an interest in protecting chalk streams
- Use the opportunity to make your case at the public examination of the plan

## **Key Sources of Information.**

The content of a local plan and what its policies say have to be supported by evidence. Councils' commission studies to inform their work eg. strategic flood risk assessments, and water cycle studies. That evidence has to be publicly available on its web site.

Organisations who have responsibilities for the water environment will publish their own studies and reports and they will be publicly available, again very often via the Council's web site as part of its evidence base. For example, the Environment Agency's River Basin Management Plans and water companies' business plans.

Use these sources to help make your case for protecting chalk streams:

## **Planning Applications**

Getting involved in a planning application can be daunting particularly when there is a lot of technical information submitted to support it. We are often asked

- Which stages do I have a say in as a member of the public or a local resident?
- When in the process should I get involved?
- Who should I contact to express my concerns / support?
- What kind of evidence do I need to bring, or is my opinion / role as a community member enough?

In this section we aim to answer those questions

*Which stages do I have a say in, as a member of the public or a local resident?*

You can comment on an application when it is registered and published on the council's web site. You can also make comments when new information is submitted such as revised drawings and additional technical reports. The council is unlikely to publicise when new information is submitted so we would advise you to check the web site regularly.

If the application is to be considered by a committee you can ask to speak at the meeting

Should the application be refused and there is a planning appeal you can make representation to the inquiry in written form and if there is a public hearing you can attend and speak.

*When in the process should I get involved?*

Councils encourage applicants to consult local people and relevant organisations before they submit a planning application. This pre-application consultation is not a formal requirement but developers submitting major applications will often hold local

exhibitions. Take the opportunity if the development is near a chalk stream to raise your concerns.

Once a planning application has been registered it will be put on the Council's web site, a site notice should be posted close to the location of the proposed development and letters should be sent to residents close to the site. Details of applications often appear in local newspapers.

When the application is published you can comment on it. Councils usually set a date of 21 days later to receive comments. By all means respond if you can within that time, but you can comment on an application up to the point at which a decision is made.

*Who should I contact to express my concerns / support?*

You should write to the council setting out your views on an application. You can contact your local councillor and inform them of your concerns. If you have a parish council let them know of your concerns as they will be consulted on applications and may share your concerns.

There are a number of organisations who have a particular interest in the health of our chalk streams. You could contact them to see if they are aware of an application and seek their support. They are listed at the end of this advice.

*What kind of evidence do I need to bring, or is my opinion / role as a community member enough?*

In considering responses to a planning application, the council will focus on the planning issues raised and the supporting evidence. Whilst petitions and a large number of letters objecting or supporting a proposal will provide a good indicator of local feeling, numbers alone will not make a strong argument.

If you are raising specific issues regarding an application and the impact of the development on chalk streams, the points you make will be more effective if they are supported with evidence. Objections to a development will also carry more weight if they are supported with evidence. The form of the evidence you present will depend on the topic and what information is available. For example, if you say that there is an existing risk of flooding which would be made worse, then you should support that view with evidence. If you think the proposal adds to existing problems of pollution in a chalk stream, then you should have the evidence to describe what the current issue is.

The council will contact a number of internal and external consultees for their advice on an application. Of particular interest would be the advice from the Environment Agency, Lead Local Flood Authority, the Water Company and the council's own ecologist. We suggest you read what they have to say as it may well provide support to your own case and you can refer to that advice in your own submissions.

In making your representation, where possible refer to the relevant policy in the local plan.

## **Where To Start?**

A planning application at first sight can be a challenge, especially if it is for a large amount of development and a lot of documents have been submitted. We suggest you read first the planning statement which usually sets the context for the proposals and describes the main elements. In regard to chalk streams look for documents relating to the water environment eg. a flood risk assessment, drainage statement and plans and ecology reports. This should help you to understand what is proposed, what the issues are and have they been addressed.

We have set out below some examples of questions which might help you prepare your response.

- Is the site in the flood plain, is there local knowledge of flooding? If yes how does the development address the issue.
- Is there a history of surface water flooding on the site what is its source? What is proposed to address the issue
- What is proposed for the disposal of wastewater? Is there capacity in the wastewater network to cope with the development? Is there a history of local issues with capacity of the network eg discharges into watercourses?
- Is there a history of water quality issues relating to the water course, if yes do you know what are the causes of it? What is proposed to address the issue?
- Is the site in a protected zone for groundwater and if yes what impact will the development have and what measures will be put in place to protect the aquifer?
- Is sediment run-off an issue? If yes, what measures are proposed to control sediment entering the water course during construction?
- Does the site contain made-up ground, potential for ground contamination? If yes, what controls will be put in place to minimise any potential pollution of ground water or water courses?
- What is the ecological importance of the site and how important is it in relation to water courses? What measures will be in place to protect and enhance the biodiversity of the chalk stream? Is there scope to improve the chalk stream?

## **Post Decision**

If permission is refused for a development the applicant has a right of appeal to the secretary of state who will appoint an inspector. The appeal can take one of three forms: written representation, informal hearing and public inquiry. You can participate in the appeal by submitting additional representations and by appearing and speaking at the hearing or public inquiry.

If an application is permitted, it may be that further details on key issues such as drainage need to be submitted via new applications. You can comment on those applications.

### Sources of Information

Environment Agency <https://www.gov.uk/government/organisations/environment-agency>

Southern Water, <https://www.southernwater.co.uk>

SE Water <https://www.southeastwater.co.uk>

Thames Water, <https://www.thameswater.co.uk>

Wessex Water <https://www.wessexwater.co.uk>

### Environmental Groups

Angling Trust <https://anglingtrust.net/>

Fish Legal (formerly Anglers' Conservation Association) <https://fishlegal.net/>

Hampshire and Isle of Wight Wildlife Trust <https://www.hiwwt.org.uk/>

River Action UK <https://riveractionuk.com/>

Test & Itchen Association <https://test-itchen.com/>

Wessex Rivers Trust <https://www.wessexrt.org.uk/>

Wild Trout Trust <https://www.wildtrout.org/>

Wildfish( formerly Salmon and Trout Conservation) <https://wildfish.org/>

### Helpful Planning References

National Planning Policy Framework 2024

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Development should where possible improve local environmental conditions ref para 187

Planners take into account likely effects of development including pollution on the natural environment. ref para 198

Note a revised NPPF was published for consultation in December 2025 it is likely to replace the 2024 later this year

Planning Practice Guidance (PPG)

<https://www.gov.uk/government/collections/planning-practice-guidance>

The Government publishes guidance on specific topics to complement the advice in the NPPF eg

- Natural Environment (2025)
- Flood Risk and Coastal Change (2022)
- Water Supply, Waste Water and Water Quality (2019)