

14 July 2026

Planning Development,
Havant Borough Council,
Public Service Plaza,
Civic Centre Road,
Havant,
Hampshire, PO9 2AX

Dear Sir

I objected with a comment on the planning portal on the 14 July, below is a more detailed version and rationale.

Objection to the Southleigh Planning Application (APP/26/0234)

I wish to object to the Southleigh planning application on the following grounds:

1. Omission of West Brook's Status as a Chalk River and Failure to Assess Associated Impacts

The application's landscape, ecological, and environmental documents **do not identify West Brook as a Chalk River**, despite authoritative evidence confirming its status as follows:

Natural England / Defra Chalk Rivers Dataset The official Chalk Rivers (England) dataset clearly shows West Brook within the chalk river network and **within or immediately adjacent to the development boundary**. (*Natural England Open Data Geoportal: Chalk Rivers – England*)¹

Ecological Characteristics of Chalk Rivers Chalk rivers are defined by:

- Clear water and diverse flora
- Pure, mineral-rich water from chalk aquifers
- Stable year-round temperatures
- Diverse aquatic plants including water-crowfoot and water star-wort
- Sensitive species such as bullhead, brook lamprey, Atlantic salmon, and white-clawed crayfish
- Winterbourne headwaters that naturally run dry in late summer

Global Rarity Only 200 chalk rivers are known globally, and 85% are found in the UK, primarily in southern and eastern England.

These characteristics make chalk rivers **exceptionally sensitive** to sedimentation, nutrient enrichment, hydrological change, and pollution.

Major Concerns

The **Surface Water Drainage Strategy** identifies West Brook as an **outfall** for surface water during construction and post-development. Construction-phase runoff, sediment, and pollutants will **fundamentally alter the chalk river's physical and chemical characteristics**, degrading water quality and harming specialist species. Sustainable Drainage Schemes (SuDS) discharges during

heavy rainfall may contain contaminants such as hydrocarbons, tyre wear particles, microplastics, and elevated nutrient loads.

The omission of West Brook's chalk river status means the applicant **cannot have applied the correct mitigation hierarchy**, nor complied with Natural England's chalk river protection guidance.

Recommended Actions

Because the ecological baseline is incomplete, the assessment is **potentially unsound**. I request:

- A **full independent ecological review** specifically addressing chalk river sensitivity.
- A revised drainage strategy that **removes West Brook as a discharge point** and ensures **no construction-phase runoff** enters the chalk river.
- A chalk-river-specific mitigation and restoration plan aligned with Natural England guidance and the Water Framework Directive.

2. Insufficient Assessment of Impacts on Nore Farm Stream and Freshwater Inputs to Chichester Harbour AONB & SSSI

Nore Farm Stream is one of the **few reliable year-round freshwater sources** feeding into the Emsworth section of Chichester Harbour — a designated **Area of Outstanding Natural Beauty (AONB)** and **Site of Special Scientific Interest (SSSI)** of international importance for birdlife.

Ecological Importance

This freshwater supply is essential for:

- **Emsworth swans**, which gather daily at Slipper Pond and Nore Barn Woods
- **Egrets, moorhens**, and other water birds
- **Brent geese**, which overwinter in the harbour
- **Kingfishers**, which have been observed along these streams

During recent extreme heat events, Nore Farm Stream continued to flow when other freshwater sources were depleted, providing **critical refuge** for wildlife.

Major Concerns

The construction phase is expected to last **10 years**, creating prolonged risk of contamination from sediment, hydrocarbons, disturbed soils, and accidental spills.. Post-development SUDs discharges may degrade water quality entering the SSSI, particularly during storm events.

The ecological documentation **does not include a freshwater impact assessment** for streams entering Chichester Harbour, despite its protected status and reliance on these inputs.

Recommended Actions

Given the sensitivity of the harbour and its protected species, I request:

- A **full independent ecological impact assessment** on freshwater flows entering Chichester Harbour AONB/SSSI.
- A revised drainage and construction management plan ensuring **no deterioration** in water quality or flow in Nore Farm Stream.
- Clear evidence that freshwater sources for protected bird species will be **maintained and safeguarded** throughout construction and operation.

Conclusion

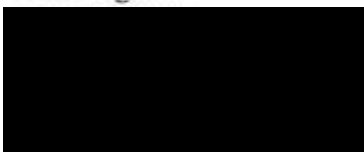
The planning application omits two critical ecological features:

- **West Brook's status as a Chalk River**, a habitat of national and international importance
- **The freshwater role of Nore Farm Stream** in supporting protected bird species within Chichester Harbour AONB/SSSI

These omissions undermine the validity of the environmental assessments and pose significant risks to sensitive habitats and protected wildlife. I therefore request that the application be **paused** until independent ecological reviews are completed and the environmental documentation is corrected to reflect these key features.

If you have any questions on this objection please let me know

Kind regards



References:

1. <https://naturalengland-defra.opendata.arcgis.com/datasets/Defra:chalk-rivers-england/explore?location=50.854019%2C-0.952071%2C14>