



## Representation Form

### Southbourne Modified Neighbourhood Plan 2014-2029 Submission Modified Plan (January 2023)

The Neighbourhood Planning (General) Regulations 2012 - Regulation 16

Southbourne Parish Council has prepared a modified Neighbourhood Plan. The modified plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

Copies of the Southbourne Modified Neighbourhood Plan 2014-2029 Submission Modified Plan (January 2023) and supporting documents are available to view on Chichester District Council's website:

<http://www.chichester.gov.uk/neighbourhoodplan>.

**All comments must be received by 5:00 pm on 14 April 2023.**

There are a number of ways to make your comments:

- Complete this form on your computer and email it to: [neighbourhoodplanning@chichester.gov.uk](mailto:neighbourhoodplanning@chichester.gov.uk)
- Print this form and post it to us at: **Neighbourhood Planning East Pallant House 1 East Pallant Chichester PO19 1TY**

#### Use of your personal data

All comments in Part B below will be publicly available and identifiable by name and (where applicable) organisation. Please note that any other personal information included in Part A below will be processed by Chichester District Council in line with the principles and rights set out in the UK GDPR (General Data Protection Regulation) and the Data Protection Act 2018, which cover such things as why and for how long we use, keep and look after your personal data.

#### How to use this form

Please complete Part A in full in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying to which paragraph your comment relates by completing the appropriate box.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	Fay Goodson
<b>Address</b>	Reside Developments Ltd, The Dutch House, 132-134 High Street, Dorking

Postcode	RH4 1BG
Telephone	██████████
Email	<a href="mailto:fgoodson@residedevelopments.co.uk">fgoodson@residedevelopments.co.uk</a>
Organisation (if applicable)	Reside Developments
Position (if applicable)	Senior Planner
Date	13 <sup>th</sup> April 2023

## PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	SB1: Development Within and Outside the Settlement Boundaries.
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

**Please give details of your reasons for support/opposition, or make other comments here:**

Reside oppose this policy it is acknowledged that the policy has been amended slightly since NP2 and the pre submission NP3. But Reside consider as per their representations that there is fundamental flaws in relation to this policy.

The policy duplicates Local Plan Policy 45 and is therefore not needed and is contrary to paragraph 16(f) of the NPPF which is clear that plans should avoid *“unnecessary duplication of policies that apply to a particular area”*.

In addition to this, the NPPF is clear that the Local Plan may include both strategic and non strategic policies and neighbourhood plans should contain non strategic policies. The NPPF provides definitions for strategic and non strategic policies and it is clear that the acceptability of development outside of the settlement boundaries is a strategic matter, as it relates to the *“overall strategy for the pattern, scale and quality of development”* (NPPF Paragraph 20).

The policy as drafted alongside Policy SB2 also sets a cap on development, because the only housing development that can come forward in Southbourne in the plan period is within the settlement boundary or that permitted by Policy SB2. This is contrary to the basic conditions;

1. Paragraph 11(a) of the NPPF requires that plans should *“be sufficiently flexible to adapt to rapid change”*. In Woodcock Holdings v SSCLG [2015] EWHC 1173 (Admin), Holgate J quashed a decision of the Secretary of State refusing planning permission, on the basis that (inter alia) he had failed to appreciate that the emerging Hurstpierpoint and Sayers Common 2031 Neighbourhood Plan (with which it was said the development was in conflict) would not pass examination. That was because it proposed a “cap” on development in the plan area of 30-40 dwellings. As he put it at paragraph 126:

*... the Secretary of State should have appreciated from the BDW case (as well as from the Claimant's post-inquiry representations) that policy H4 would not satisfy the requirement in the “basic condition” to have regard to the NPPF, and in particular the need for “flexibility” and “to plan positively for growth”, unless it was amended so as to remove the cap limiting new housing in the village to 30 — 40 dwellings...*

2. In light of this, Holgate J held that it was incumbent on the Examiner to consider whether the ENP, which limits the amount of development to be delivered in an area, complied with the core requirements of the NPPF to (i) meet the housing needs of an area (ii) to do so with “flexibility” and (iii) to “plan positively for growth”: see Woodcock Holdings at para. 126. Further, in Woodcock Holdings, Holgate J held that the need for flexibility in Neighbourhood Plan housing supply policies “has all the more force” in a situation where (as here) a neighbourhood plan is proceeding in advance of an up to date NPPF compliant plan (at para. 127).
3. Similarly, in BDW Trading v Cheshire West and Chester [2014] EWHC 1470 (Admin), one of the reasons that the examiner’s decision to approve the Tattenhall Neighbourhood Plan survived challenge was because he found that the draft plan did not intend to limit the overall level of growth in the area; and he required an amendment to be made to the plan to ensure that it did not do so: see BDW at para. 36.

If the wording of Paragraph B of Policy SB1 is not changed, this would prohibit sustainable development outside of the settlement boundaries in Southbourne. Chichester District Council have an Interim Position Statement for Housing (“IPS”) to help guide development in the Local Plan area until the Local Plan Review is adopted.

The IPS can be used in such circumstances where the Council does not have a 5YHLS and it does not consider that development outside of settlement boundaries is necessarily inconsistent with sustainable development. The approach taken by NP3 is therefore inconsistent with the Council’s approach to what amounts to sustainable development at present and the strategic policies within the Local Plan.

Therefore, if the wording of Policy SB1 is not removed or changed, we consider the NP3 fails to comply with basic conditions (a) and (d).

It is also important to note that the Examiner of NP1 also raised issue with similar wording in Policy 1 of the Submission Draft of NP1 and deleted the policy wording, giving their explanation at paragraphs 5.8 and 5.9 of the Examiners Report.

*“5.8 I am however concerned that this policy appears overly strategic in nature and as such should not be included, in the form that it is drafted within a neighbourhood plan. The title of the policy in particular suggests that it is strategic and is therefore unacceptable. To reduce perception that there might be a strategic intent within Policy 1, this should be renamed as I have recommended below.*

*5.9 To the extent that over the life of the Plan proposals might come forward for development outside the settlement boundaries, it would not be appropriate for the Plan to require such proposals to conform to development plan policy in the countryside. That responsibility should be for Chichester District Council to determine through its development plan policies. For this reason I have indicated that if this policy is to be retained, the final sentence of the draft policy should be removed, as indicated below. In the explanatory text, the policy should therefore encourage, rather than direct development, within the established settlements within the parish. The recommended revision to the policy is shown in Appendix 1.”*

(Continue on separate sheet if necessary)

**What improvements or modifications would you suggest?**

Remove part B of the proposed policy.

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.



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Please complete Part B overleaf, identifying to which paragraph your comment relates by completing the appropriate box.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	Fay Goodson
<b>Address</b>	Reside Developments Ltd, The Dutch House, 132-134 High Street, Dorking

Postcode	RH4 1BG
Telephone	██████████
Email	<a href="mailto:fgoodson@residedevelopments.co.uk">fgoodson@residedevelopments.co.uk</a>
Organisation (if applicable)	Reside Developments
Position (if applicable)	Senior Planner
Date	13 <sup>th</sup> April 2023

## PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	SB13: Green and Blue Infrastructure
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

<p><b>Please give details of your reasons for support/opposition, or make other comments here:</b></p> <p>The proposed Ham Brook Chalk Stream Wildlife Corridor shown within the Policies Map Inset 1 and annotated as SB13, does not align with the proposed Strategic Wildlife Corridor within the emerging Chichester Local Plan 2021-2039, which completed its Regulation 19 Consultation in March 2023.</p> <p>Furthermore, the area in the emerging local plan has been fully tested with Natural England and therefore represents the correct extent of the wildlife corridor.</p> <p>The NPPF is clear that the Local Plan may include both strategic and non strategic policies and neighbourhood plans should contain non strategic policies. The NPPF provides definitions for strategic and non strategic policies. Paragraph 20(d) states the following should be considered a strategic policy;</p> <p><i>“...conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate mitigation and adaption”.</i></p> <p>Therefore, we do not consider that Neighbourhood Plan should include this designation. The Neighbourhood Plan can only designate within its Parish Boundary, and therefore the boundary of their proposed Wildlife Corridor is arbitrary.</p> <p>In addition to this, the size of the proposed Wildlife Corridor within the Submission Plan, is considered strategic in size.</p> <p>The supporting text for SB13, also relies on information contained within paragraph 5.72, which representations have been made under policy SB14, and our representations are clear that paragraph 5.72 relies on incorrect evidence and therefore is not justified.</p> <p>There is therefore no justification for the Ham Brook Chalk Stream Wildlife Corridor shown in the Neighbourhood Plan.</p>
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(Continue on separate sheet if necessary)

**What improvements or modifications would you suggest?**

The Policies Map Inset 1 is amended to remove the proposed Ham Brook Chalk Stream Wildlife Corridor and reference to this corridor is removed from the policy and supporting text.

(Continue on separate sheet if necessary)

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Please complete Part B overleaf, identifying to which paragraph your comment relates by completing the appropriate box.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	Fay Goodson
<b>Address</b>	Reside Developments Ltd, The Dutch House, 132-134 High Street, Dorking



Postcode	RH4 1BG
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Email	<a href="mailto:fgoodson@residedevelopments.co.uk">fgoodson@residedevelopments.co.uk</a>
Organisation (if applicable)	Reside Developments
Position (if applicable)	Senior Planner
Date	13 <sup>th</sup> April 2023

## PART B

To which part of the document does your representation relate?

Paragraph Number	5.72	Policy Reference:	SB14: Biodiversity
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

<p><b>Please give details of your reasons for support/opposition, or make other comments here:</b></p> <p>We <u>oppose</u> the supporting text of the policy and not the policy itself. At paragraph 5.72 NP3 states in relation to Chalk Streams;</p> <p><i>“It will be expected that significant buffer areas of at least 50 meters either side of these assets will remain undisturbed and maintained in line with guidance issued by the Sussex Wildlife Trust.”</i></p> <p>This then links to footnote number 4, which is an advice note from the Sussex Wildlife Trust titled ‘Chalk Rivers and Streams’. This advice note states under ‘How can I manage my chalk stream in a more wildlife-friendly way?’;</p> <p><i>“Establishing buffer strips</i></p> <p><i>By allowing a vegetated (grassy or woody) margin of 5-20 metres between your garden/arable field/livestock and your stream, you are helping to stop soil and pollution running off into streams, as well as providing valuable wildlife corridors for a number of rare species.”</i></p> <p>This advice note is appended to these representations.</p> <p>Therefore the advice note does not recommend a 50-metre buffer as set out in paragraph 5.72, and we do not believe the 50-metre figure is justified by any evidence within the plan or evidence base.</p> <p>It is important to note this has now been raised multiple times through representations to both NP2 and NP3 and no valid justification for the 50-metre figure has been given.</p> <p style="text-align: right;">(Continue on separate sheet if necessary)</p>
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<p><b>What improvements or modifications would you suggest?</b></p>
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Remove incorrect reference to 50-metre buffer.

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

## Why are chalk rivers and streams important?



One of our rarest native mammals the water vole, is often found living on chalk rivers. Stable water levels and lush, green plant growth provides ideal conditions for them © P Stevens

England has most of the chalk rivers in Europe. There are only 35 chalk rivers between 20 and 90 km long in the UK. They are mostly found in south and east England - from Dorset to Humberside. Chalk geology is rare worldwide. The Sussex chalk rivers and streams are therefore of global importance.

All chalk rivers are fed from natural underground aquifers meaning they have clean, clear water and stable water temperatures. These unique conditions, along with their alkaline chalk geology, support a rich diversity of wildlife including important fish populations such as brown trout, native crayfish and many other specialist species. Their rarity means that many chalk rivers in the UK have been designated as Special Sites of Scientific Interest (SSSIs).

## What is a chalk river?

A chalk river or stream is a watercourse which flows across chalk bedrock, and/or is influenced by local chalk geology. Chalk rivers are usually fed by underground or seasonal springs flowing from chalk and often have 'winterbourne' stretches in their headwaters which run dry, or partially dry in late summer to the spring.

## What is the difference between a chalk river and a chalk stream?

Chalk rivers and streams are recognised as a priority habitat under the UK Biodiversity Action Plan (BAP), and general descriptions of what constitutes such habitat are given in 'The State of England's Chalk Rivers' (EA & EN; 2004) and 'Chalk Rivers - Nature Conservation and Management' (EA & EN; 1999). Sites are generally considered to be 'streams' rather than 'rivers' when they are no further than 5km from their source or greater than 5m wide (unless they have been artificially widened).

## Chalk rivers

The larger chalk rivers are often more exposed to light and therefore have characteristic plants such as river water crowfoot and watercress in them. Some examples such as the Mole in Hampshire have low banks and shallow, clear flowing water which supports a range of water-loving plants. Sometimes you may be able to see the chalk bedrock on the bottom of the river or beds of gravels along the stream bottom. Many chalk rivers have however been artificially widened, straightened and deepened.

## Sussex chalk streams

South Downs chalk streams are different from classic chalk rivers such as Hampshire's river Itchen. Each chalk stream has its source much higher in the hills, and the gradient of the streams are very steep. The South Downs chalk streams have therefore been classified as a distinct type.

Sussex chalk streams often occur in small gulleys which are more wooded than other chalk rivers and streams. This results in unusual features including:

- mini chalk waterfalls which form when chalk water upwellings 'calcify' in the air
- dense shade which means that there is naturally less vegetation cover
- typical chalk river plants like Water Crowfoot are often absent - which is more natural
- stream channels are diverse because of natural flow restrictions such as tree roots
- woody debris is common in the channel and it influences the stream flow
- the substrate (stream bed) is less frequently made up of flints and mobile gravels

## How do I know if I have a chalk stream on my land?

If you live within the South Downs National Park and your stream runs across the chalk, then it is highly possible you have a chalk watercourse. Take a look at the pictures in this leaflet which may help show you what a chalk stream looks like. Alternatively contact [www.sxbrc.org.uk](http://www.sxbrc.org.uk) or [info@sxbrc.org.uk](mailto:info@sxbrc.org.uk) who can supply you with maps of protected or rare species and habitats on your land.

Sussex chalk streams have a unique character, with steeply sloping, fast flowing streams associated with ancient woodland and woody debris reminiscent of northern UK streams. One of the most natural examples of a chalk spring head in the UK is also found in Sussex. We also have 'Knuckerholes' which are thought to be holes which go directly into the aquifer.



A chalk 'waterfall' or Tufa deposit © N Holmes



A very rare and pristine wooded chalk spring head in East Sussex © F Southgate



A typical Sussex chalk stream with meanders and woody shade © F Southgate



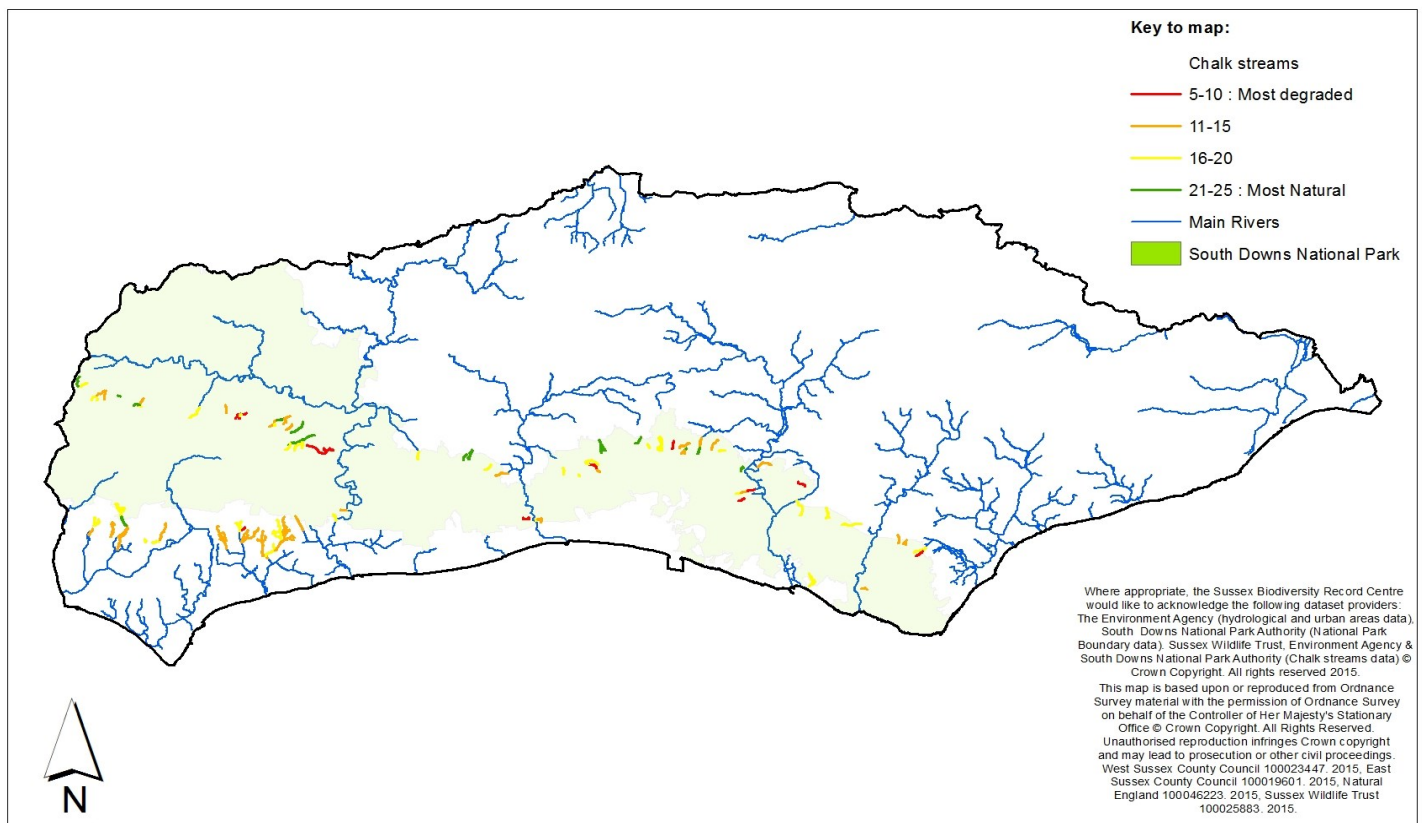
A West Sussex Chalk Stream © N Holmes

# Chalk Streams & Rivers

## Where are the chalk streams and rivers in Sussex?

In Sussex we have three designated chalk rivers – The Ems and Lavant in West Sussex and the Lewes Winterbourne in East Sussex. We also have over 140 km of chalk streams spread throughout the South Downs National Park, many of which are more natural than the legally designated larger chalk rivers. The map below shows the location of all the confirmed Sussex chalk streams in 2011.

## Sussex Chalk Streams



## What other interesting features might I find on my chalk stream?

### *Mills and mill ponds*

On the flowing (perennial) chalk streams in Sussex, mills were often built. Many of these mills are now derelict. Associated mill ponds have often developed into swampy habitats into which chalk water flows. These chalk habitats are of high nature conservation interest and their restoration to a ponded habitat could be considered environmental degradation. It may be desirable to retain mill structures as historic features, where they do not impede fish migration.

### *Watercress beds*

The pure flows of perennial chalk streams made them ideal locations for watercress farms. In Sussex there are a few locations where historic and modern cress farms can be found on chalk streams.



A derelict watercress bed in West Sussex © Fran Southgate

# Chalk Streams & Rivers

## What wildlife is characteristic of Sussex chalk streams?

*Some of the characteristic plants you would expect to find in chalk Winterbournes are:*

Water-cress (*Rorippa nasturtium-aquaticum*), Fool's water-cress (*Apium nodiflorum*), Water speedwell (*Veronica anagallis-aquatica/catenata*) & Sweet-grass (*Glyceria* sp(p.))

*Some plants you might expect to find in Perennial chalk streams are:*

Blunt-fruited water-starwort (*Callitriche obtusangula*), Lesser water-parsnip (*Berula erecta*), Brook water crowfoot (*Ranunculus penicillatus* subsp. *pseudofluitans*). *Catabrosa aquatica* (whorl-grass) is associated with shallow, trampled, silty edges of perennial chalk streams. *Hildenbrandia rivularis*, a red encrusting alga, the moss *Cratoneuron filicinum*, and the liverwort *Pellia endiviifolia* are also a sign of strong springs.

Opposite-leaved pondweed (*Groenlandia densa*) and Mare's-tail (*Hippurus vulgaris*) are typical of chalk streams, but much less widespread than other plants.

A number of unusual liverworts and mosses are associated with chalk streams. These include the moss *Hygroamblystegium fluviatile* / *tenax* and the liverworts *Leptodictium riparium*, *Fissidens* spp. & *Platyhypnidium riparioides*.

Most chalk streams and springs have a unique community of aquatic insects and invertebrates, associated with the chalky water and the unusual gravels, woody debris and tufa features. Where chalk streams are not obstructed by weirs and sluices, their clear flowing water creates extremely good habitat for fish such as brown trout (*Salmo trutta*).



Chalk stream with mosses and fool's water cress © N Holmes



Chalk stream with gravels and submerged plants © N Holmes



Brown trout – one of the species which benefits from the presence of healthy natural chalk streams

## Problems with Sussex chalk streams



Ditched and re-inforced chalk stream © N Holmes



Defunct weir © N Holmes



Urbanised chalk stream © N Holmes



Parrot's feather smothering a chalk pond  
© F Southgate

### *Ditching & Removal of Natural Features*

One of the main factors which has caused the loss of a number of our rare chalk streams is that they have been straightened and ditched for drainage purposes, or they have been 'tidied up' and their natural features such as the woody debris dams have been removed.

### *Weirs and man-made obstructions*

Many chalk streams have had weirs and other artificial structures installed in the channel. These structures stop the natural flow of the stream from creating stream features, they slow water flow, encourage siltation of gravels and prevent migratory fish from passing upstream. Many weirs and structures served a historical purpose but are now defunct. Consult with a local Environment Agency Fisheries and Biodiversity team to see if you can remove / bypass your weir.

### *Urbanisation*

Where streams pass through urban areas they have often had natural features removed and have been turned into urban drains with man-made stream banks. Some streams are 'gardenised' and planted with non native plants, with their banks mown or used as compost heaps. Chalk streams can be a huge asset to urban areas. They rarely experience flood flows but they are often 'forgotten gems' which receive pollution and run off from urban drainage.

### *Non Native Invasive Species*

Until recently, garden centres were allowed to sell invasive wetland plants which are not native to the UK. Unfortunately, a large number of these plants such as Crassula and Parrot's feather have found their way into rivers and wetlands. They often outcompete native plants, and once present are extremely difficult to remove.

### *Abstraction*

Unfortunately, the over-abstraction of water from underground reservoirs for drinking water and for irrigation of crops and gardens can result in the natural springs running dry in seasons when they should still be flowing.

### *Pollution*

Because their water sources are so pure any agricultural or urban pollution can severely disrupt the ecology of the stream.

## How can I manage my chalk stream in a more wildlife-friendly way?

Unless you have invasive species present or man made modifications, one of the best things you can do with a Sussex chalk stream is nothing. By not managing the stream you are allowing it to slowly recover its natural character and features. There may however be a few things you can do to help 'kick start' natural recovery or to prevent and reverse damage to your chalk stream. These include:-

- **Removing obstructions and artificial banks.**  
If you notice any concrete or artificial structures which are no longer useful seek advice from the Environment Agency or the contacts below to get help to remove or bypass them
- **Establishing buffer strips**  
By allowing a vegetated (grassy or woody) margin of 5 – 20 metres between your garden/arable field/livestock and your stream, you are helping to stop soil and pollution running off into streams, as well as providing valuable wildlife corridors for a number of rare species.
- **Having a wildlife survey**  
Contact the Biodiversity Records Centre below to see if they have any information about your stream. If not, ask them who can do a survey to look at the wildlife interest in the stream.
- **Retain natural features**  
Leave fallen trees or wood in the stream. These provide valuable wildlife features and will help the stream re-naturalise itself. If banks slump, let them, and if islands or gravel bars form, leave them.
- **Don't de-silt**  
If you think your stream is too silty, then it is usually better to 'narrow' the stream with willow and hazel spilling and woody flow deflectors which help the river speed up and naturally cleanse itself of silt, as well as helping to create more natural bankside features.
- **Seasonal fencing.**  
If you have livestock which graze to the edge of your chalk stream, or poach down the edges, consider putting in seasonal fencing to limit the removal of wetland plants and bank erosion. In open grassland however, some seasonal low level grazing and poaching can be beneficial.
- **Restore your chalk stream to its natural glory**  
Seek advice from local experts such as Sussex Wildlife Trust or the Wild Trout Trust who may be able to help you restore and re-naturalise the old course of your chalk stream
- **Remove non native plants.** Be careful though, as they can spread very easily.
- **Tell us about new chalk streams.** There may be a few we've missed!



Chalk stream with winter flows © N Holmes



# Chalk Streams & Rivers

## Other things that can be done to help chalk streams:-

- Re-create riffles
- Faggoting of river banks to restore normal flows
- Encourage a two stage channel with wet margins
- Strategically place flow deflectors such as logs to help restore channel meanders
- Restore Ranunculus beds
- Restore native and natural fish populations and fish breeding habitat
- Install temporary and permanent fencing to help prevent stock poaching
- Reduce bankside mowing and in-channel weed cutting



Coir fibre rolls and hazel faggots can be used to help re-narrow streams to increase water flows and restore bankside habitat

## Helping chalk streams from the home or farm

If you live in or near the South Downs, or know of a chalk stream on your land or in your local area there are a few things you can do which might help.

- **Reduce water use at home.** The less water you use, the less water needs to be abstracted from the chalk aquifers – the source of water for chalk streams. (see also, 'How to help wetland wildlife from home' advice sheet)
- **Reduce water use on the farm.** If you have a farm abstraction licence, try to use water more wisely by watering crops at the end of the day, installing a farm reservoir (often you can get grant support for this), and only using as much water as you need.
- **Get advice.** Your local Wildlife Trust, South Downs National Park or Natural England representative can put you in touch with someone who can advise you on what you can do to restore and enhance your chalk stream. Try calling Wildcall on 01273 494777.
- **Don't pour chemicals down the drain.** By helping to keep the water draining from your house and farm clean, you are helping to prevent damaging chemicals enter into watercourses

**PLEASE NOTE:** All river work within 8m of a main river channel needs consent from the Environment Agency (EA). If your chalk river has been designated a Site of Special Scientific Interest then you may need consent from Natural England to carry out restoration work on your chalk stream. For more information see contacts and further reading overleaf.

# Chalk Streams & Rivers

## Contacts

**Sussex Wildlife Trust (Wetlands Project)**

[www.sussexwildlifetrust.org.uk](http://www.sussexwildlifetrust.org.uk)

01273 497555

**Natural England**

0845 600 3078

[enquiries.southeast@naturalengland.org.uk](mailto:enquiries.southeast@naturalengland.org.uk)

**Sussex Biodiversity Record Centre**

01273 497521

[www.sxbrc.org.uk](http://www.sxbrc.org.uk)

**Wild Trout Trust**

[www.wildtrout.org](http://www.wildtrout.org)

**Environment Agency**

Ask for Fisheries & Biodiversity or  
Land Drainage consent teams

03708 506506

[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

**South Downs National Park Authority**

[www.southdowns.gov.uk](http://www.southdowns.gov.uk)

0300 303 1053

**Wildcall Wildlife Advice Line**

01273 494777

[www.sussexwildlifetrust.org.uk/discover/wildlife-advice](http://www.sussexwildlifetrust.org.uk/discover/wildlife-advice)

## References & Further Reading

- **DEFRA:** The State of England Chalk Rivers— [adlib.everysite.co.uk/adlib/defra/content](http://adlib.everysite.co.uk/adlib/defra/content)
- **English Nature (1999):** Chalk Rivers; Nature Conservation and Management
- **Natural England:** Water Cress growing and it's environmental impacts- [publications.naturalengland.org.uk/file/76003](http://publications.naturalengland.org.uk/file/76003)
- **Habitat Action Plan:** Chalk Rivers - <http://jncc.defra.gov.uk/page-5706>
- **N Holmes:** An Investigation of the Watercourses in Sussex arising from the Chalk Aquifer of the South Downs. Report 1 January 2009 and Report 2 December 2010
- **South downs National Parks Authority:** River Valleys- [www.southdowns.gov.uk/looking-after/landscape/river-valleys](http://www.southdowns.gov.uk/looking-after/landscape/river-valleys)

Sussex wetlands project promotes the sustainable management of rivers and the restoration of wetland habitats for people and wildlife

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## Representation Form

### Southbourne Modified Neighbourhood Plan 2014-2029 Submission Modified Plan (January 2023)

The Neighbourhood Planning (General) Regulations 2012 - Regulation 16

Southbourne Parish Council has prepared a modified Neighbourhood Plan. The modified plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

Copies of the Southbourne Modified Neighbourhood Plan 2014-2029 Submission Modified Plan (January 2023) and supporting documents are available to view on Chichester District Council's website:

<http://www.chichester.gov.uk/neighbourhoodplan>.

**All comments must be received by 5:00 pm on 14 April 2023.**

There are a number of ways to make your comments:

- Complete this form on your computer and email it to: [neighbourhoodplanning@chichester.gov.uk](mailto:neighbourhoodplanning@chichester.gov.uk)
- Print this form and post it to us at: **Neighbourhood Planning East Pallant House 1 East Pallant Chichester PO19 1TY**

#### Use of your personal data

All comments in Part B below will be publicly available and identifiable by name and (where applicable) organisation. Please note that any other personal information included in Part A below will be processed by Chichester District Council in line with the principles and rights set out in the UK GDPR (General Data Protection Regulation) and the Data Protection Act 2018, which cover such things as why and for how long we use, keep and look after your personal data.

#### How to use this form

Please complete Part A in full in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying to which paragraph your comment relates by completing the appropriate box.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	Fay Goodson
<b>Address</b>	Reside Developments Ltd, The Dutch House, 132-134 High Street, Dorking

<b>Postcode</b>	RH4 1BG
<b>Telephone</b>	██████████
<b>Email</b>	<a href="mailto:fgoodson@residedevelopments.co.uk">fgoodson@residedevelopments.co.uk</a>
<b>Organisation (if applicable)</b>	Reside Developments
<b>Position (if applicable)</b>	Senior Planner
<b>Date</b>	13 <sup>th</sup> April 2023

## PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	SB20: Water Infrastructure and Flood Risk
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

<p><b>Please give details of your reasons for support/opposition, or make other comments here:</b></p> <p>At part B of the policy it is stated that within or adjacent to the Lumley and Ham Brook development must demonstrate measures that will be taken to ensure that polluted runoff (included suspended sediment) does not leave the site and enter the surrounding waterbodies during either construction or operation.</p> <p>Reside believe the policy should also support the removal of existing polluting neighbours to the Lumley and Ham Brook, that would provide a betterment.</p> <p style="text-align: right;">(Continue on separate sheet if necessary)</p>
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<p><b>What improvements or modifications would you suggest?</b></p> <p>Amend the policy to include support for the removal of existing polluting neighbours to the Lumley and Ham Brook.</p> <p style="text-align: right;">(Continue on separate sheet if necessary)</p>
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If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.