

# **Response to Neighbourhood Plan Community Consultation Proposals**

## **Introduction**

This is our response to the proposal to allocate housing on Barn Meadow, Drove Lane (site NA07). We have also taken the opportunity to make some suggestions to enhance a number of the policies that make up the emerging New Alresford Neighbourhood Plan.

We are sharing this response as an alternative view to the current proposals, use it as you wish; whether to support or oppose the information we have put forward. Please feel free to copy any or all of this document for inclusion in your own responses.

It is vital that any neighbourhood plan that is proposed for the town reflects the evidence on the ground and, most of all, the wishes of the community.

Please respond to the Community Consultation and encourage all your family and friends to do the same, so that your views are taken into account for the future of Alresford:

**[LINK TO ONLINE SURVEY](#)**

**[or visit www.tinyurl.com/AlresfordConsultation](http://www.tinyurl.com/AlresfordConsultation)**

**[New closing date: Survey now closing – midnight Tuesday 17 December](#)**

The survey allows you to skip any questions you do not want to answer and to go back and amend any that you have.

The Friends of Barn Meadow

9 December 2024

# **Objection to Barn Meadow Development**

## **- Short Responses -**

### **6. HOUSING**

#### **17. NA07 - Land off Drove Lane**

##### **What are the constraints/ opportunities of this site?**

##### **Constraints – In Brief:**

We oppose the development of Barn Meadow and believe that it is the least appropriate of all the sites proposed for housing in Alresford.

However, in common with both the South Downs National Park Authority and Winchester City Council's Ecology & Biodiversity reports, we would welcome carefully considered public access to the site for the community to enjoy its rich wildlife and beautiful landscape.

The landowner has prohibited public access to the land for many years, but we would welcome the construction of bird watching hides and a path through the site, potentially to the south side, behind the existing homes and away from the more sensitive river margins. However, this is not dependent on any development, so we suggest that the land be otherwise left for the wildlife to remain undisturbed.

This site is entirely unsuitable for housing or any other construction due to many reasons, including the flood risks associated with a floodplain site, unsafe access, the impact on wildlife, the environment, heritage and its landscape as follows:

##### **Flooding**

- This site is located entirely on the floodplain. Much of the site is the highest risk Flood Zones 2 and 3. We have clear evidence of extensive groundwater flooding even in the proposed construction area within Flood Zone 1. The evidence from the Environment Agency shows that this flooding will worsen significantly in the future as an effect of climate change.

##### **Disturbance and Displacement of Wildlife and Loss of Natural Habitat**

- This water meadow is within the immediate Impact Risk Zone of the Upper Itchen Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). Two thirds of Barn Meadow directly borders these sites that have been granted the highest levels of conservation protection because of the important landscape, habitat and the rare species of animals and plants they support.

##### **Pollution Including the Release of Nutrients into the River Itchen Catchment**

- Pollution will be exacerbated by the fact that the land has no connection to mains foul drainage.

##### **Road Safety**

- This stretch of Winchester Road has a troubled history of road collisions, which continue to occur regularly along the stretch of road where the access to the development is proposed.

- High sided vehicles pass in the middle of the road under the railway bridge 60 metres from the proposed entrance.
- Over many years, New Alresford Town Council has consistently committed to support the calls from Winchester Road’s residents for improved road safety and only recently agreed to further road safety measures at the exact location of the proposed site access junction.
- The proposed development access would increase all of the existing risks and no doubt create new ones all of its own

### **Landscape**

- Winchester City Council’s high level Landscape Sensitivity Assessment rates the landscape of Barn Meadow as ‘High Sensitivity Red’ for all aspects and recommends that “protection from development is the preferred option”.

### **Impact on South Downs National Park Setting**

- The development would be within 70 metres of the South Downs National Park and would adversely affect its immediate views.

### **Destruction of Alresford’s Agricultural Heritage**

- Historically known as Barn Meadow, with its structures largely still in tact, this former water meadow forms an integral part of Alresford’s rich agricultural heritage.

### **Local Green Space**

- New Alresford Town Council appears to be attempting to block the community’s desire to designate the land as Local Green Space, as overwhelmingly evidenced in the 2<sup>nd</sup> Community Consultation.

The sheer volume of text on the Design Code assessments points to the significant constraints of the site. The same applies to the Design Code maps; the keys of which fail to cope with the important and overlapping details about the area’s designations and features, to such a degree that it is impossible to interpret the maps with any degree of accuracy.

Any one of these significant issues in their own right might make the development of Barn Meadow unjustifiable for the **relatively small impact that 8 or 9 dwellings will make on the overall requirement to find greenfield sites for 100 homes**. Combined, the numerous detrimental impacts make it inconceivable that such a development is in New Alresford’s best interests, or in line with commitments to safeguard the town’s natural environment.

So that it is clear, **none of the proposed dwellings will be Affordable Housing**.

The landowner has misquoted the findings of the 1<sup>st</sup> Community Consultation and made repeated misleading references to affordability in its slick flyer.

That affordability claim is directly contradicted at paragraph 6.23 of the landowner’s own Information Pack, where it has clearly stated that **“No Affordable Housing is proposed.”** Paragraph 6.24 goes on to make it clear that the provision of Affordable Housing would make this proposal unviable.

**See page 6 for supporting information and detailed objections to Barn Meadow Development**

**Response to Draft Neighbourhood Plan Policies**  
**- Short Responses -**

**4. POLICIES -SEE 'POLICIES' AND 'POLICY MAPS' FILES ON WWW.NEWALRESFORD-TC.GOV.UK**

**Question Title**

**6. Do you feel the policy is complete and accurate?**

	Yes	No
Architecture & Urban Design Policy		--
Community Facilities Policy		--
Delivery & Monitoring Policy		--
Employment Policy		NO
Green & Blue Infrastructure Policy		NO
Heritage: Historic Environment Policy		NO
Heritage: Locally Designated Heritage Assets Policy		NO
Housing: Size, Type, and Mix Policy		--
Housing: strategy Policy		NO
Key Views Policy		NO
Landscape Policy		NO
Local Green Space Policy		NO
Movement & Access Policy		NO
Safeguarded Watercress Way Policy		--
Settlement Boundary Policy		--
Sustainable Tourism Policy		--
Town Centre Policy		NO

Please see the following section on page 5 for our brief reasoning for these responses.

## **Policies – Short Responses**

### **7. Where you have said No, please could you provide your reasons**

#### **Green & Blue Infrastructure Policy: NO**

**Why?** The Green and Blue Corridors ignore the vital role the whole of Barn Meadow plays in providing habitat and connectivity for wildlife.

#### **Heritage: Historic Environment Policy &**

#### **Heritage: Locally Designated Heritage Assets Policies: NO**

**Why?** We propose that the former water meadow, Barn Meadow at Drove Lane, be included on the Local Heritage List.

#### **Housing Strategy Policy: NO**

**Why?** We are dismayed that there has been so little resistance from New Alresford Town Council to the requirement for the allocation of New Sites (greenfield sites) for the provision of a further 100 dwellings.

The draft Housing Strategy Policy makes no attempt to push back on the size of this current allocation nor does it take this key opportunity to mark any form of concern for Alresford's ability to achieve further allocations in future years. We are not aware that the Neighbourhood Plan Advisory Committee has challenged the 100 dwelling figure in any way.

At what stage should we consider New Alresford effectively 'full'?

#### **Key Views Policy: NO**

**Why?** The Key Views Policy continues to ignore the views northwards across Barn Meadow from Winchester Road and from Drove Lane looking west, recognised by Winchester City Council's Natural Environment & Recreation Team's Landscape Assessment Report that makes special reference to these views, summarising the landscape to be "High Sensitivity Red" and more generally by the public in the 2<sup>nd</sup> Community Consultation.

#### **Landscape Policy: NO**

**Why?** Water meadows to be expressly protected.

#### **Local Green Space Policy: NO**

**Why?** The clear desire of the New Alresford public to designate Barn Meadow as Local Green Space, expressed at the 2<sup>nd</sup> Community Consultation, has been ignored.

#### **Movement & Access Policy: NO**

**Why?** Road safety concerns in relation to the proposed LCWIP Cycle Route and absence of provision for a safer pedestrian route along Drove Lane.

#### **Town Centre Policy: NO**

**Why?** The Town Centre Policy should seek to prevent business Use Class E outside of the Town Centre.

**See page 22 for supporting information for these responses.**

## Objection to Barn Meadow Development - Full Response

### 6. HOUSING

#### 17. NA07 - Land off Drove Lane

##### What are the constraints/ opportunities of this site?

##### Constraints – In Brief: (repeats pages 2 + 3 above)

We oppose the development of Barn Meadow and believe that it is the least appropriate of all the sites proposed for housing in Alresford.

However, In common with both the South Downs National Park Authority and Winchester City Council's Ecology & Biodiversity reports, we would welcome carefully considered public access to the site for the community to enjoy its rich wildlife and beautiful landscape.

The landowner has prohibited public access to the land for many years, but we would welcome the construction of bird watching hides and a path through the site, potentially to the south side, behind the existing homes and away from the more sensitive river margins. However, this is not dependent on any development, so we suggest that the land be otherwise left for the wildlife to remain undisturbed.

This site is entirely unsuitable for housing or any other construction due to many reasons, including the flood risks associated with a floodplain site, the impact on wildlife, the environment, heritage and the landscape as follows:

##### **Flooding**

- This site is located entirely on the floodplain. Much of the site is the highest risk Flood Zones 2 and 3. We have clear evidence of extensive groundwater flooding even in the proposed construction area within Flood Zone 1. The evidence from the Environment Agency shows that this flooding will worsen significantly in the future as an effect of climate change.

##### **Disturbance and Displacement of Wildlife and Loss of Natural Habitat**

- This water meadow is within the immediate Impact Risk Zone of the Upper Itchen Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). Two thirds of Barn Meadow directly borders these sites that have been granted the highest levels of conservation protection because of the important landscape, habitat and the rare species of animals and plants they support.

##### **Pollution Including the Release of Nutrients into the River Itchen Catchment**

- Pollution will be exacerbated by the fact that the land has no connection to mains foul drainage.

##### **Road Safety**

- This stretch of Winchester Road has a troubled history of road collisions, which continue to occur regularly along the stretch of road where the access to the development is proposed.

- High sided vehicles pass in the middle of the road under the railway bridge 60 metres from the proposed entrance.
- Over many years, New Alresford Town Council has consistently committed to support the calls from Winchester Road’s residents for improved road safety and only recently agreed to further road safety measures at the exact location of the proposed site access junction.
- The new development access would increase all of the existing risks and no doubt create new ones all of its own

### **Landscape**

- Winchester City Council’s high level Landscape Sensitivity Assessment rates the landscape of Barn Meadow as ‘High Sensitivity Red’ for all aspects and recommends that “protection from development is the preferred option”.

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- Historically known as Barn Meadow, with its structures largely still in tact, this former water meadow forms an integral part of Alresford’s rich agricultural heritage.

### **Local Green Space**

- New Alresford Town Council appears to be attempting to block the community’s desire to designate the land as Local Green Space, as overwhelmingly evidenced in the 2<sup>nd</sup> Community Consultation.

The sheer volume of text on the Design Code assessments points to the significant constraints of the site. The same applies to the Design Code maps; the keys of which fail to cope with the important and overlapping details about the area’s designations and features, to such a degree that it is impossible to interpret the maps with any degree of accuracy.

Any one of these significant issues in their own right might make the development of Barn Meadow unjustifiable for the **relatively small impact that 8 or 9 dwellings will make on the overall requirement to find greenfield sites for 100 homes**. Combined, the numerous detrimental impacts make it inconceivable that such a development is in New Alresford’s best interests, or in line with commitments to safeguard the town’s natural environment.

So that it is clear, **none of the proposed dwellings will be Affordable Housing**.

The landowner has misquoted the findings of the 1<sup>st</sup> Community Consultation and made repeated misleading references to affordability in its slick flyer.

The affordability claim is directly contradicted at paragraph 6.23 of the landowner’s own Information Pack, where it has clearly stated that **“No Affordable Housing is proposed.”** Paragraph 6.24 goes on to make it clear that the provision of Affordable Housing would make this proposal unviable.

## Constraints – In Detail:

### Flooding:

1. This is the only site proposal that is River Valley Floor Landscape Character Type – ie that is floodplain – with **100% of Barn Meadow lying on the floodplain**
2. Barn Meadow is located at the confluence of the River Alre/Arle and the Cheriton Stream, downstream from the River Itchen’s source in Cheriton. Therefore, the site’s flooding is subject to the conditions of not just one, but of two rivers; clearly increasing the probability that flood events will occur.
3. Much of the site falls within the **Environment Agency’s highest risk Flood Zones 2 and 3.**
4. Video evidence – [see link](#) – has been offered to NATC showing that even the supposedly ‘drier’ land in Flood Zone 1, where the buildings of the development are proposed, the land is subject to **seasonal groundwater flooding**; it occurs across the whole site.
5. We have sent written correspondence to NATC from The Environment Agency confirming that its flood mapping data (particularly groundwater flooding) is incomplete and encouraging our local evidence to be taken into account. So far NATC has refused to even consider this evidence. As a result, we believe that the public does not have complete and balanced information in relation the flood risks across the proposed site of construction on Barn Meadow.
6. The Site Report refers to the ground sloping towards the river because the meadow is not entirely level. However, as can be seen from the presence of just one single 2 metre contour line through the entire site, over distances in excess of 200 metres, and a visual inspection of the site, any sloping is minimal.  
The majority of the difference in height between the distant 2 metre contour lines is accounted for *outside* the boundaries of the meadow within the adjoining land. The ground level outside of site NA07 starts with a pronounced bank, before visibly rising up from the flat floodplain of Barn Meadow.  
This level profile in large part explains why groundwater flooding is extensive across the entire floodplain site. A fairly level profile would be expected across a water meadow; any raised parts would have been impossible to irrigate using natural water levels alone.
7. As can be seen from the Environment Agency’s Climate Change Model flood maps – [see link](#) – the effects of surface water flooding are predicted to increase. We understand that this mapping represents only a likely mid-point estimation and not a worse case scenario. In addition to this increased surface water flood risk, it is inevitable that the groundwater risk would also increase.
8. There has been significant human intervention to the topography of the floodplain. It is understood that in past centuries the river’s form has been channelled, increasing the rate of flow. At 90° to the merged river channels is the railway embankment. The only way for the water to pass the embankment is through a relatively narrow culvert leading to Borough Farm downstream.



In the event of increased flooding, such as that predicted by climate change modelling, **any debris blocking the culvert will turn the embankment into a large dam**; multiply the effects of flooding and creating significant additional risks to any development on the floodplain.

9. **None of these flood risks are present at any of the other proposed sites** – they are all entirely within the low risk Flood Zone 1. If these risks were to be ignored at Barn Meadow, the long-term sustainability of the development would be at significant risk.
10. Twelve families were forced to leave their homes on the Chase Field estate in **Farringdon** after the **warnings from locals of groundwater flooding were ignored** by the council and developers. This led to the eventual demolition of the entire development – [see link](#) – at great cost, not only in financial terms, but also to the local environment.
11. Obtaining **home insurance**, if it were to be available at all, on floodplain sites such as Barn Meadow would likely be at significantly higher premiums – [see link](#). In most cases, the government’s Flood Re scheme – [see link](#) – will not cover buildings constructed after 2008.
12. **Flooding** poses risks not only to the long-term sustainability of any development, but also significant **risks during the construction phase** – [see link for photographs](#). In the words of Alex Deacon, Catchment Partnership Manager of the Wessex Rivers Trust:

“We’re dealing with the consequences of unsustainable new development on the floodplain of the River Were; like the Arle, a chalk river headwater.

Winter groundwater inflows and surface water run off during heavy rainfall is resulting in large quantities of soil running off the building site and into the river which feeds into the River Avon Special Area of Conservation (SAC).

Once the soil is lost to the river, these low energy chalk streams cannot wash it away, resulting in long term ecological damage”

The Warminster site is some distance from the River Avon SAC that it has affected. Barn Meadow shares its banks with the River Itchen Special Area of Conservation, so any such impact on its protected habitat would be immediate and devastating to the protected habitat.

13. It is perhaps no coincidence that all of the existing homes along Winchester Road are located above the meadow itself. This points to **centuries of local knowledge** and an **acceptance of the need to work with the demands of the landscape, not against them**.

#### **No Connection to Mains Foul Drainage:**

14. Contrary to the assertion made by the landowner at para. 6.10 of its Information Pack, there is **no foul drainage anywhere near** the relevant part of the B3047, Winchester Road.
15. A simple enquiry to Southern Water or a visit to the area surrounding the site (both of which we have done) immediately reveal this claim by the landowner to be at the very least misleading. It is a further attempt to make a development plan for this wholly unsuitable site appear less unattractive than its reality permits.

We are very disappointed that New Alresford Town Council has allowed this and other misleading information to be included in documentation given out by the landowner at the Community Consultation event.

16. We believe that the cost of linking a relatively small site such as this to the nearest point on the main foul sewer, in De Lucy Avenue, would be disproportionate in the context of this site with its proposal for nine houses.  
This is, after all, a development whose viability, its own landowner tells us at paragraph 6.24 of its Information Pack, is so tenuous that it must make the tenth building on the site a small business unit rather than a house, in order to avoid crossing the threshold to include Affordable Housing requirements. Therefore, it seems fanciful to imagine the cost of linking to the mains foul sewer some 250-300 metres up the hill being any more viable.
17. If, in the absence of mains foul drainage, the sewage and other waste water from this development would be treated by septic tanks or package sewage treatment plants, this would inevitably have a **polluting effect on the River Itchen Catchment**, leading amongst other issues to concerns in relation to the Nutrient Neutrality of the development.
18. As can be seen, this area of floodplain suffers groundwater flooding across the whole site, making the demands of any septic tanks or package sewage treatment plants particularly challenging, as would the regulations in relation to such treatment in close proximity to SSSI/SAC designated sites.
19. Any septic tanks or package sewage treatment plants would require their own drainage fields. We understand that for three small two bedroomed properties on the flood plain locally in Itchen Stoke, the same land owner, the Grange Estate, has had to install a drainage field of 17 metres by 21 metres; an area of 357m<sup>2</sup> in total or 119m<sup>2</sup> per house.
20. Taking the experience of these 3 houses, one might expect a field drainage area of around 960 m<sup>2</sup> for the houses alone. We understand that it would need at least the same for the small business units and potentially even more for the café. This would require a total drainage field of perhaps 3,000 m<sup>2</sup>. Therefore, there would be insufficient space in the area shown for the housing, the café and the business units for this area.
21. Increased surface run-off from the entrance road, rainfall on the roofs of the houses, the work units and café, and the associated car parking and other constructions on the proposed development will all have to be absorbed by SuDS and/or soakaways. These would not function when seasonal groundwater levels rise, inevitably leading to further flooding.

**Impact on Wildlife and Habitat Heightened by Proximity to Upper Itchen Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC):**

22. 65% of the site shares a **border with the SSSI and 55% with the higher designation SAC.**
23. None of the other sites proposed in the town border either a SSSI or SAC.
24. SSSI and SAC are the highest levels of conservation protection and, along with only one other site, Barn Meadow will require a **Habitats Regulation Assessment (HRA)**, with the drainage issues and flood risk being complicating factors.

25. Appendix B provides an expert opinion on the HRA implications for development at Barn Meadow. This highlights that the site is functionally linked land, supporting habitats for the adjacent SSSI and SAC sites, both of which are listed within the National Site Network and receive the highest levels of legal protection.
26. The opinion summarises that the impacts on the site are unlikely to be capable of being mitigated and that a conclusion of ‘no adverse effect on integrity’ could not be reached and therefore the provision of this development would not satisfy the requirements of the Habitats Regulations.

**The proposals risk adverse effects to the integrity of both the SSSI and the SAC qualifying features**

27. The landowner’s slick flyer refers to its own ecological assessments, reporting a notable presence of water voles, the IUCN Red List Endangered White-clawed crayfish and otters. All of these are species cited in Natural England’s Objectives for River Itchen SAC and SSSI. They and their habitat are heavily protected by law. Yet the landowner’s flyer seeks to make a virtue of developing the connected habitat of these and the other protected species.
28. Beyond the long list of species cited on the SSSI and SAC designations are many others whose presence on Barn Meadow is testament to its largely undisturbed state, such as the Great White Egret, Heron, Red Kite, Swift, Snipe, Lapwing, Sandpiper, Water Rail, Buzzard, Kestrel, Barn Owl, along with barbastelle, Daubenton's and Leisler’s bats and many more besides.
29. The wildlife disturbance and displacement would be caused by a combination of the following:
  - direct loss of habitat to the development
  - ongoing noise, light and activity from:
    - 9 dwellings
    - 4 business units (the precise number is unclear) including workshops, which we can only imagine would bring a heightened level of noise disturbance for the wildlife
    - a café, and
    - a new public recreation area
  - effects of groundwater pollution from the homes, businesses and cafe; and
  - the construction phase of the development
30. It is unlikely that this impact on the protected species from any development could be successfully mitigated.
31. 100% of the site is on the Priority Habitat Inventory (PHI) – no other site is PHI.
32. 100% of the site is within the SSSI + SAC Impact Risk Zone.
33. In the words of Martin De Retuerto, Director of Nature Recovery at the Hampshire & Isle of Wight Wildlife Trust:

**“The Wildlife Trust supports opportunities to secure Barn Meadow for nature recovery and further protection of the River Itchen catchment and its floodplain.**

With the emerging Local Nature Recovery Strategy, Barn Meadow on the River Arle floodplain represents **a location of not insignificant importance to local nature recovery, and mitigation to climate change.**”

Going on to say that, “**The River Arle is one of the most biodiverse and sensitive reaches within the Itchen catchment**, an internationally renowned chalk river and Special Area of Conservation. **Future land use changes should prioritise protection and recovery of this rich natural heritage.**”

34. In July 2024, we wrote to NATC to ask it, as the qualifying body for the neighbourhood plan exercise, to request a copy of the ecological report commissioned by the landowner and carried out during June 2018. Having not even received a reply to that message from NATC, and in the spirit of paragraphs 7.6 to 7.9 of its Information Pack headed 'Collaboration', which refers to “working together, alongside the community”, we have now asked the landowner for a copy of this report. At the time of writing, we have yet to receive a substantive response from them either.
35. The CEO of the landowner has himself made representations in relation to the need to protect designated sites in the Upper Itchen Catchment, so is not unaware of the impact this proposed development would have.

In his objection to Southern Water’s plans to construct a water pipeline, reported only last year, Lord Mark Ashburton’s objection reads: “The Itchen and its tributary,” [in that instance the Candover Brook, in this one both the Alre/Arle and the Cheriton Stream] “are chalk streams which enjoy the highest status in the UK as special areas of conservation and are habitats of internationally recognised importance.” - [see link to article](#).

36. The Appendix to this document is site specific advice in relation to the requirements of the Habitats Regulations Assessment applicable to Barn Meadow.

### **Road Safety:**

37. The stretch of **Winchester Road** where the development entrance is proposed has a troubled **history of collisions that continues to this day**. We are aware of 3 RTAs this year alone, one within 10 metres of the proposed junction.
38. Vehicles heading into Alresford travel at speed down the long hill from the A31 and accelerate down Winchester Road as they leave town in the other direction, making this location for a junction particularly dangerous. Most collisions occur as a result of traffic stopping to turn into or out of the layby or other properties. Adding a junction on the bend will add a further stopping point, increasing the existing risks.
39. **High sided vehicles pass in the centre of the road** under the railway arch, just 60 metres from the proposed entrance road.
40. Over many years, **New Alresford Town Council has had a proud record of consistently supporting the residents of Winchester Road in their repeated calls for improved road safety**.

NATC has:

- repeatedly written to Hampshire County Council to **request a reduction in the road speed** and the Police to enforce speed limits on this stretch of road
- only recently, committed to **install town entry gates and ‘Dragon’s Teeth’ road markings at this exact location** in order to help reduce road speeds due to safety concerns
- bought **new speed reminder cameras** at the suggestion of Winchester Road residents and as a direct result of those residents’ road safety concerns
- recorded peak speeds **in excess of 80 mph** at that location

41. The local response to Hampshire County Council's post-Covid transport strategy consultation was emphatic – [see link](#). Whilst other road safety issues in the town received 7 responses or fewer, the **proposal to reduce the speed limit and provide other safety measures on the Winchester Road approach to Alresford received over 100 votes of support**.

42. Sustrans recognises the B3047 as the least safe cycle route from any of the proposed sites to the town centre. **Winchester Road does not meet the minimum safety standards for it to be included as part of National Cycle Route N23.**

Introducing a new junction will exacerbate the safety issues and the proposed development will increase the number of cycle journeys from the new houses, businesses and cycle cafe on a route that is recognised as not being up to minimum safety standards for the task.

43. **Existing road safety risks will be multiplied** at this sensitive location as a result of this proposed development by:

- Adding another junction so close to a number of hazards
- The significant increase in traffic that will be generated as a result of the vehicle movements from:
  - 9 houses
  - 4 business units (the precise number is unclear)
  - a café, and
  - a new public recreation area

### **Road Access and Parking:**

44. Access from Winchester Road would involve the **felling of mature trees and hedgerow**, with potentially harmful affects on habitats.

45. From the proposal, it is clear that the **parking provision is entirely inadequate** to cope with the users of the café, the employees of the small businesses, as well as their deliveries and visitors together with the visitors to a public recreation area.

46. This **will inevitably lead to off-site parking**; however, **there is little or no suitable parking nearby**. It would inevitably spill out from the site to include the already busy layby and potentially lead to overspill parking on Winchester Road itself.

47. WinACC's Transport & Planning Action Group has commented that the restrictions imposed on the building line of this proposed development due to the Flood Risk Zones\* impose a linear settlement structure.

This necessitates a disproportionately large amount of solid road surfacing for the significant vehicular access proposed. Such an arrangement is inefficient and less sustainable on the best of sites, but when considered in the context of the off-mains drainage requirements of a complex floodplain site such as this, it will add a significant further challenge that will have the capacity to overwhelm the drainage system during periods of groundwater flooding, as are experienced across Barn Meadow. This would result in run-off onto the meadow and the adjoining SSSI/SAC designated watercourses.

\*For the record, we do not accept that this line acknowledges the evidenced presence of seasonal groundwater across the whole of this site and, therefore, should not be followed.

48. Given the multitude of reasons not to site the entrance on Winchester Road, it is worth pre-empting the possibility that the landowner might propose alternative access for the development from the other end of the water meadow. However, the following features should be noted in relation to **Drove Lane**:

- it is a single track road with passing places
- despite the majority of it being limited only by the national speed limit, ie 60mph, Drove Lane is the only recreational route we are aware of in the town where walkers receive no protection from a dedicated path or pavement
- it is a particularly popular route with walkers and cyclists; both locals and visitors
- it connects to the Wayfarer's Walk and several other public rights of way, and forms an essential part of the Arle Valley Trail, a route that NATC has actively promoted over decades

These features explain why the landowner has chosen not to seek access to the land from Drove Lane in the first place.

#### **'High Sensitivity' Landscape:**

49. Winchester City Council's high level **Landscape Assessment Report** rates Barn Meadow's landscape as **'High Sensitivity Red'** for all aspects of its landscape.

50. The **Report recommends** that **"Protection from development is the preferred option"**.

51. Barn Meadow shares the High Sensitivity Red assessment with only one of the other proposed sites. WCC's assessment states that:

- From the "key viewpoints the site appears as open floodplain. This 'River Valley Landscape Type' ... is considered to have **significant landscape and nature conservation value** and is associated with a tranquil pastoral quality which is **extremely sensitive to disturbance and vulnerable to even slight changes.**"
- **"development here has the potential to be very prominent."**

- Particularly as it is a “**Prominent site** beside a main road into town” and notes that Barn Meadow is adjacent to the boundary of the South Downs National Park with “**strong scenic qualities.**”

52. Barn Meadow was ranked as:

1. “**High Landscape Character Sensitivity**”
2. “**High Visual Sensitivity**” and
3. “**High Value**” landscape

53. The Landscape Assessment Report concludes that **Barn Meadow is a “high sensitivity” site and that “protection from development is the preferred option.”**

54. We believe that the existing settlement edge is consistent with the landscape in so far that it acknowledges the natural boundary between the flat River Valley Floor and the River Valley Sides. Encroachment onto the River Valley Floor would only blur that natural distinction.

55. It would appear that one of the main attractions of this site is the promise of access to the former railway embankment to link up paths. We very much welcome that opportunity. However, the access to the embankment does not come from Barn Meadow, but instead from land the other side of the river. The two issues of development and access to the embankment are, therefore, unrelated.

56. **We support the extension to the Itchen Way/Watercress Way. However, this cannot be prioritised irrespective of the cost.**

57. It seems clear that the landowner seeks to link permission for this profoundly inappropriate development as its price for granting public access to an unused railway embankment that forms only a very small part of the remainder of its extensive local landholding.

Should that prove to be the case, we believe that the interested authorities should attempt to purchase the embankment. That could be done using some of the Civil Infrastructure Levy (CIL) funds available from recent developments in New Alresford. This strategy should be backed up by the contingency of applying for a Compulsory Purchase Order if negotiations are unsuccessful.

58. **Those in the positions of influence wishing to open up the route along the embankment must not contemplate sacrificing the wildlife and landscape of Barn Meadow and the road safety of the people who live near and pass through this area as the ransom for a path along the embankment.**

#### **Impact on South Downs National Park Setting:**

59. The development would be within 70 metres of the South Downs National Park and would adversely affect its immediate views. NPPF paragraph 182 provides that any development **within the National Park’s setting**, such as this, should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Given the many factors set

out in this response, the proposed **development cannot be described as ‘sensitively located’**.

60. The conservation and enhancement of wildlife (notable in the SSSI and SAC designated sites) and cultural heritage (visible in the ridges and furrows of the former water meadow’s field structure of irrigation channels that remains in tact to this day) are also important considerations under paragraph 182 in these areas. **Other sites are available for development within the town that will not adversely impact the National Park’s setting.**

#### **Destruction of Alresford’s Agricultural Heritage:**

61. Historically known as Barn Meadow, this water meadow forms an integral **part of Alresford’s rich agricultural Heritage**. Over hundreds of years, this site was used as a working water meadow, flooded in the early winter with warmer water from the underground springs to give an early crop of hay and feed the sheep that were sold at the town’s sheep markets, the source of much of Alresford’s early wealth.
62. Between 1970 and 1997, 13% of water meadows were lost from the Itchen catchment. This rate of loss accelerating to 37% in the years between 1997 and 2018, with 27 out of 73 water meadows on the Itchen tributaries being destroyed by 2018. Barn Meadow is the only hay production water meadow that remains within the town boundary. This characteristic landscape must be expressly protected.
63. Aerial photographs and LiDAR [– see link –](#) show that the field structure, extending over the whole of the site, is still in place to this day. This structure should be preserved in its entirety.

#### **Potential Local Green Space Designation:**

64. At the 2<sup>nd</sup> Community Consultation in summer 2023, the **Alresford community** made it abundantly **clear that it wished for Barn Meadow to be designated as Local Green Space**. The most frequent reasons given being protection of the meadow’s wildlife and its landscape, together with proximity and amenity to recreational routes and its rich agricultural heritage. Only one of these four criteria needs to be satisfied under the NPPF’s requirements for Local Green Space. Happily, **Barn Meadow satisfies all four criteria**.
65. We do not believe that the reason given by NATC to ignore the outcome of its last Community Consultation is a valid one and the limited explanation provided, appears to directly **contradict the written advice of Locality**, the government’s neighbourhood planning contractors, when it wrote **“to our knowledge there is nothing in current government guidance, policy or legislation that would specifically prevent land from being designated as Local Green Space solely on the grounds of having been put forward for development under a call for sites.”**



66. In the absence of authoritative advice contradicting that of Locality, **we believe that the approach taken by NATC is flawed and that Barn Meadow should be included within the scope of the Local Green Space Policy.**

**18. Considering NA07 (Land off Drove Lane), please answer the following questions:**

**A. What aspects of the site are most important to protect or preserve?**

67. Please see our previous answers for more detail, but in particular the following aspects:

**Protection of Wildlife and Wildlife Habitat:**

68. Connectivity to the Upper Itchen SSSI and Special Area of Conservation which are directly adjacent to this site.

69. 'High Sensitivity' Landscape: This land has been assessed as 'High Sensitivity Red' for all aspects and recommends that "protection from development is the preferred option."

**Physical Protection of the Site Itself:**

70. Previous **attempts to build on the floodplain locally** at Field Chase in Farringdon have ended in disaster, with the **houses being demolished** – [see link Chase Field - Farringdon Village News](#)

71. Ongoing development on another floodplain site at Warminster has resulted in the **chalk river itself becoming choked by sediment** – [see link](#) . Unlike rivers fed by water tumbling down from mountains and hillsides, powered by gravity, chalk rivers are fed from groundwater springs that push water up from the ground before flowing away relatively gently from its source. As a result, they are considered as 'low energy' river systems, lacking the power to flush away large quantities of sediment.

72. Therefore, damage such as that at Warminster is difficult, if not impossible, for the river to recover from by itself. That site is some distance from the River Avon SAC. Barn Meadow shares its banks with the River Itchen SAC, so **any such impact on its protected habitat would be immediate and long-term.**

73. The repeated surface water run-off events since August 2024 from the Sun Lane development site bear testimony to the fact that even the best laid construction management plans can prove inadequate in the face of sustained rainfall.

74. While the significant negative impact to residents of Nursery Road may have been acted upon by the Sun Lane developers in this case, no such rectification measures would be possible for the River Itchen SSSI and SAC site. Therefore, any similar incidents at Barn Meadow would lead to long-term devastation of the surrounding protected river system.

### **Protection of Alresford's rich agricultural Heritage:**

75. As set out in greater detail above, aerial photos and LiDAR show that the field structure seen in the form of the ridges and furrows of the irrigation channels of the water meadow extending over the whole of the site, is still in place to this day. This structure should be preserved in its entirety.

### **Preserve the Potential for Nature Based Solutions:**

76. The opportunity to re-flood the meadow offers potential solutions for reclaiming increasingly rare wetland habitat as well as fighting climate change, providing Natural Flood Management and nutrient and mineral sequestration opportunities. These will not only help the environment around New Alresford to recover, but the whole of the Itchen River system downstream and, in the case of nutrients mitigation opportunities, it will have for the Solent Marine Sites (SEMS) beyond.
77. The SEMS are designated as internationally important sites for their habitats and species and is the final destination of the majority of pollution from our river, including excess nutrients that lead to eutrophication, whereby the body of water becomes enriched with nutrients, leading to excessive growth of algae and other plant life and in turn oxygen depletion and 'dead zones' that are unable to support life.
78. Many of the reasons for our response to this development have already been covered in the excellent objection from the influential Alresford Society to an application by the same landowner, for a site on the floodplain of the same Upper Itchen Catchment, just 1.0 km away from Barn Meadow at Abbotstone. The objection to application 19/02128/FUL can be found at Appendix A.
79. Many aspects of the Alresford Society & Friends of the Arle's objection to that application in its original form are particularly relevant to the proposal for Barn Meadow, albeit that Barn Meadow is a strictly 'greenfield site', whereas the one at Abbotstone is very much 'brownfield'; requiring extensive remediation, including the removal of almost 1,000 tonnes of concrete. Extending over a total of 4ha., the concrete hardstanding and former-watercress beds alone make up an area approximately two thirds the size of Barn Meadow.
80. That application was originally titled "*Redevelopment of redundant watercress beds at Abbotstone and building 10 units of holiday accommodation*". Following strong local objections, the construction element of the proposal was withdrawn and the application was granted permission under a revised title to use the land "for the creation of wetland and other habitat as an environmental mitigation bank including nitrate and phosphate credits, and BNG [Biodiversity Net Gain] units."
81. Such an outcome at Barn Meadow would not only provide the most suitable use of the site's floodplain location and protect its wildlife, but it would also bring substantial financial benefits to the landowner through public funding streams, such as Environmental Land Management Scheme (ELMS), BNG units and the nutrient credits referred to above. This would seem to be a very satisfactory outcome for both the landowner and the community.

**B. Are there specific design features or types of development that you would like to avoid at this site?**

82. We would like to avoid buildings of any type other than sensitively located bird and animal watching hides located on higher ground, such as the raised bank between Winchester Road and the southern edge of Barn Meadow.
83. Once the floodplain itself has been built upon, it would make it most unlikely that any nature based solutions involving re-flooding of this site would be possible in the future.

**C. What qualities/ features at the site would you like design guidance/ codes to reinforce?**

84. Protection and enhancement of the existing natural habitat and the agricultural heritage asset of the remaining water meadow structures, seen in the form of the ridges and furrows of the former water meadow's field structure of irrigation channels.
85. Wildlife hides to be constructed in a rural vernacular which adopts a scale, massing and appearance that is in keeping with the high sensitivity landscape they would overlook.
86. A path or boardwalk could be considered along the back of the properties on Winchester Road and Drove Lane to allow the public to travel more safely between the two roads and to enjoy the meadow.

**D. What improvements could potential development bring to enhance the quality of public realm at the site?**

87. No development. For all the reasons set out in this response, it is clear that development would not enhance the quality of the public realm at this site.
88. A balance must be found between protecting the wildlife and allowing the public to enjoy its richness without disturbing it. Careful management of the floodplain together with opening up of views across the high sensitivity landscape from Winchester Road and Drove Lane through the sympathetic management of the overgrown hedges.
89. Bird and animal watching hides could be installed to allow the community to experience the Great White Egret, Heron, Red Kite, Swift, Snipe, Lapwing, Sandpiper, Water Rail, Buzzard, Kestrel, Starling murmurations, Barn Owl and the many other birds and mammals, such as deer and otters, that would remain if the human presence was a gentle one. A path or boardwalk could also be considered along the back of the properties on Winchester Road and Drove Lane to allow the public to travel more safely between the two roads and enjoy the meadow.
90. The very cautious comments of the South Downs National Park Authority (SDNPA), laden as they are with several provisos, apply only in the event that New Alresford Town Council fails to designate the land as Local Green Space.

91. If the will of the Alresford community - so clearly expressed at the 2<sup>nd</sup> Community Consultation - is followed and **Barn Meadow is designated as Local Green Space, the SDNPA would support only the delivery of a nature conservation area with public access and an extension to the Itchen Way/Watercress Way**, citing the South Downs Local Plan Policy CD20 (Walking, Cycling and Equestrian Routes) and the contribution to nature recovery, **as envisaged in the original Local Green Space proposal made by the Friends of Barn Meadow – see link.**
92. **This would provide all the enhancements for the benefit of both the wildlife and the community, without the need to take the reckless decision to build on the floodplain next to the SSSI and SAC sites.**
93. The report from the 1<sup>st</sup> Community Consultation concluded that there was **“overwhelming support for the designation of Local Green Spaces.”** The outcome of the 2<sup>nd</sup> Community Consultation provides overwhelming evidence of the land being demonstrably special to the local community and all other requirements of Local Green Space designation are more than adequately covered elsewhere in this note. Therefore, unless there is equal and opposite overwhelming support for Barn Meadow to be developed for housing, it is clear that the land should be designated as Local Green Space under the emerging Neighbourhood Plan.
94. Should New Alresford Town Council continue to ignore the outcome of its own Community Consultations, it would then require sufficient evidence and reasoning to show that it was entitled to reach the decision that it did. So far, we have seen no sign of either of these. Without them, the decision making process – and any subsequent neighbourhood plan – would be left wide open to legal challenge.

#### **E. How can we ensure the development positively integrates with existing landscape and historic character?**

95. See response to part A. Leave this land alone, completely, subject to potential for the improvements for the wider benefit of the wildlife and the community, set out in part D, namely sensitively located bird and animal watching hides and pathway or boardwalk.

## **Response to Draft Neighbourhood Plan Policies**

### **- Detailed Responses -**

#### **7. Where you have said No, please could you provide your reasons:**

##### **Green & Blue Infrastructure Policy: NO**

**Why? The Green and Blue Corridors ignore the vital role the whole of Barn Meadow plays in providing habitat and connectivity for wildlife.**

We note that the 'Existing Green Corridor' is partially recognised on the sides of the Upper Itchen SSSI and SAC outside Barn Meadow, however, it is not considered within the meadow itself. It is clear that many different species, including a number listed in the SSSI and SAC citation, use the whole of Barn Meadow to live, to hunt and to migrate through. Therefore, we do not accept the Existing Green Corridors map is complete.

Likewise, the 'Existing Blue Corridor' does not recognise the role that the floodplain plays in providing rich habitat for aquatic bird and plant life, amphibians, reptiles and a significant number of mammals, including water voles and otters, that use the river ecosystem.

The Green and Blue Infrastructure Policy fails to acknowledge that 100% of Barn Meadow is on the Habitat Priority Inventory and ignores the contribution it makes to wildlife habitat and connectivity.

Chalk rivers are a globally recognised asset, with only 200 chalk rivers across the planet. Therefore, water meadows and floodplains are key attributes of the local character of chalk rivers, and as such meet that aim of the draft Neighbourhood Plan's Green and Blue Infrastructure Policy by very much contributing to a sense of place.

Whilst we welcome initiatives that would encourage biodiversity, such as green roofs, we cannot otherwise support a Green and Blue Infrastructure Policy that would not fully protect such significant existing green/blue infrastructure. A more ambitious approach would be to look at nature based solutions to the climate and biodiversity crises, including re-flooding the floodplain at Barn Meadow. These initiatives would attract significant grants, such as Environmental Land Management Schemes (ELMS), for the landowners as we have suggested to them and in our original proposal – [see link](#).

**Therefore, we do not agree with the Green & Blue Infrastructure Policy in its present form.**

**Heritage: Historic Environment Policy & Heritage: Locally Designated Heritage Assets Policies: NO**

**Why? We propose that the former water meadow, Barn Meadow at Drove Lane, be included on the Local Heritage List.**

Barn Meadow forms a key part of Alresford's rich agricultural Heritage. Over hundreds of years, this site was used as a working water meadow, flooded in the early winter with warmer water from the underground springs to give an early crop of hay and feed the sheep that were sold at the town's sheep markets, the source of much of Alresford's early wealth.

Aerial photographs and LiDAR show that the field structure, extending over the whole of the site, is still in place to this day. This structure should be preserved in its entirety – [see link for photograph and illustration of the typical structure of a water meadow system.](#)

**Subject to Barn Meadow's inclusion on the Local Heritage List, we would support the Historic Environment Policy & Heritage: Locally Designated Heritage Assets Policies.**

## **Housing Strategy Policy: NO**

**Why? We are dismayed that there has been so little resistance from New Alresford Town Council to the requirement for the allocation of New Sites (greenfield sites) for the provision of a further 100 dwellings.**

**The draft Housing Strategy Policy makes no attempt to push back on the size of this current allocation nor does it take this key opportunity to mark any form of concern for Alresford's ability to achieve further allocations in future years. We are not aware that the Neighbourhood Plan Advisory Committee has challenged the 100 dwelling figure in any way.**

**At what stage should we consider New Alresford effectively 'full'?**

Whilst we accept the need for further housing in the District, we do not believe that the emerging Local Plan has placed sufficient weight on the particular factors relevant to New Alresford.

The area within the town's parish boundary is small, with very little usable land between the boundary and the existing built up area (settlement boundary). The available land is hemmed in along the parish boundary to the north, where it is constrained by our beautiful river and its Site of Special Scientific Interest and Special Area of Conservation. Likewise, to the west, it is limited not only by the SSSI and SAC, but also by the added complication of the boundary with the South Downs National Park, which introduces its own set of complications.

It has become increasingly challenging to allocate suitable greenfield sites around the town without risking multiple breaches of the emerging Local District Plan's other policies and environmental aspirations. Witness the fact that Barn Meadow, with all the issues set out in this response, is even being given serious consideration for this process.

The significant lack of available land in New Alresford means that there are not enough brownfield sites to make the principle of 'brownfield first' applicable when additional allocations are given to the town at each subsequent Local District Plan. Therefore, attention inevitably moves to the town's greenfield sites, of which precious few remain within the current parish boundaries.

The draft Local Plan Vision - Market Towns and Rural Villages, (p. 95) recognises that "the diversity of settlements means that some can accommodate more change than others." Yet it is difficult to accept that this reality has been taken into account in making the 100 dwelling allocation to New Alresford.

How much longer can these allocations be sustained before we run out of possible sites entirely and irretrievably harm the natural environment that the community of Alresford prioritises above almost everything else and the Local District Plan sets out to preserve? How will the future generations of New Alresford measure the decisions that we take now?

**Therefore, we do not agree with the Housing Strategy Policy in its present form.**

## **Key Views Policy: NO**

### **Why? The Key Views Policy ignores the views northwards across the site from Winchester Road and from Drove Lane looking west.**

NATC's own report describes the site as, "Highly visually sensitive, with northwards views across the site from Winchester Road, from the Wayfarer's Way footpath looking south, and from Drove Lane looking west. It forms an integral part of the riverside landscape which the Landscape Character Assessment recommends conserving."

Barn Meadow received the highest response to the Views section of the 2<sup>nd</sup> Community Consultation, with at least 32 positive comments received (9 in the 'Views' report and a minimum of a further 23 references to Barn Meadow's landscape or natural beauty in the 'Emails' document) . The site with the second highest number of responses received just six comments.

Despite both being specifically mentioned in the AECOM report and strongly supported at the 2<sup>nd</sup> Community Consultation, references to the views northwards across the site from Winchester Road and from Drove Lane looking west have been removed from the list of views which the current Community Consultation invited the public to comment upon. We can see no good reason for this decision to have been made.

It has been suggested that the views across Barn Meadow are limited. However, this is largely due to a lack of management of hedgerows on the site boundaries and could be readily addressed by the landowner with minimal disturbance to the surrounding vegetation. The number of trees that appear to be severely stressed by Ash dieback on Drove Lane indicates that this might happen naturally before long.

In any event, it would be a perverse outcome for the landowner to benefit from the financial windfall the proposed development would bring, as a result of its failure to maintain views across this landscape over recent years.

**Therefore, we do not agree with the Key Views Policy in its present form.**



**Landscape Policy: NO**

**Why? Water meadows to be expressly protected.**

Whilst we acknowledge the accompanying text refers to water meadows, it concentrates on watercress meadows, to the exclusion of hay producing water meadows, such as Barn Meadow. Water meadows are a finite and rapidly vanishing asset and, therefore, New Alresford has a responsibility to safeguard this rare landscape and the ecosystem it supports within the town boundaries if at all possible.

Between 1970 and 1997, 13% of water meadows were lost on the Itchen catchment. This rate accelerating to 37% in the years between 1997 and 2018, with 27 out of 73 water meadows on the Itchen tributaries being destroyed by 2018. This characteristic landscape must be expressly protected.

**Therefore, we do not agree with the Landscape Policy in its present form.**

**Subject to express protection of water meadows we would support the Landscape Policy.**

## **Local Green Space Policy: NO**

**Why? The clear desire of the New Alresford public to designate Barn Meadow as Local Green Space, expressed at the 2<sup>nd</sup> Community Consultation, has been ignored.**

The report from the 1<sup>st</sup> Community Consultation identified “*overwhelming support for the designation of Local Green Spaces.*”

The 2<sup>nd</sup> Community Consultation received a proposal from the Friends of Barn Meadow for the water meadow’s designation as Local Green Space (LGS). The response to this proposal through the consultation was overwhelming.

In breach of a Freedom of Information request, the complete response to the LGS Community Consultation is still not available to the public. However, from the limited data released, it is clear that between 80 and 100 people responded positively to the proposal for Barn Meadow’s designation as LGS.

This is compelling evidence that Barn Meadow meets the NPPF’s requirement that the land must be ‘*demonstrably special to the local community*’, especially when compared to the next highest total for the other proposed sites, which appears to be four responses.

A number of reasons why LGS would not apply to Barn Meadow have been raised by NPAC (NATC’s Neighbourhood Plan Advisory Committee (formerly Advisory Group)) at various stages of the process. Each of them has been rebutted by reference to sources such as the National Planning Policy Framework (NPPF), the NPPF Guidance and evidence from Winchester City Council’s Strategic Planning department. The latter writing on 15 March 2023 to say, “Yes, as discussed, we would not have any objection to this site going forwards as a LGS. We agree that it meets the criteria set out in the NPPF”.

Despite this, NPAC went on to claim that the site could not be considered for LGS due to it being considered for housing allocations. There is nothing to support this assertion in the NPPF or its guidance. We have questioned NPAC’s approach to this issue repeatedly since August 2023, but it has provided no authority in law, planning policy or otherwise for making this unusual decision.

Guidance has been provided by Locality, which is the Ministry of Housing, Communities and Local Government’s neighbourhood planning contractor (and from which NATC has claimed a five figure sum in grants towards the cost of preparing the emerging neighbourhood plan). Locality’s guidance was that “to our knowledge there is nothing in current government guidance, policy or legislation that would specifically prevent land from being designated as Local Green Space solely on the grounds of having been put forward for development under a call for sites.”

From the limited detail available for the 3<sup>rd</sup> Community Consultation, Barn Meadow’s exclusion from consideration for Local Green Space designation is directly contrary to this guidance.

We note the relevant part of the minutes of the steering group’s meeting of 14 August 2023:

**“AG23/019 Review comments of Community Engagement Day and other public comments received.**

Details of the consultation were not discussed other than to note that views of Alresford were prominently quoted at the community engagement day.”

Despite the agenda stating an intention to review the responses to the 2<sup>nd</sup> Community Consultation, which would have included LGS designations, this did not happen at the meeting. No explanation was offered as to why this item was ignored and we are not aware that the LGS response has ever been discussed by the Neighbourhood Plan Advisory Committee in any of its subsequent public meetings.

If there is authoritative advice contradicting the that of Locality, this should be made available to the public. In the absence of such advice, we believe that the decision to reject LGS designation for Barn Meadow and to remove the opportunity for public comment on the site at the current Community Consultation is an arbitrary and deeply flawed one.

We would like the following to be made available to the New Alresford community:

- a proper explanation of the grounds for making this significant decision
- an explanation of why, some 16 months after the consultation closed, the data from the 2<sup>nd</sup> Community Consultation has never been fully released to the public, despite the time limits for a Freedom of Information (FOI) request having passed in our request for this to be done
- confirmation of whether the results in relation to LGS designation from the 2<sup>nd</sup> Community Consultation have ever been fully discussed in open session of either NPAC or NATC. If so, please make details of such discussions available. If not, please let us know how it was considered appropriate to form an LGS policy without ever doing so.

We request that the clear wishes of the community be respected by designating Barn Meadow as Local Green Space.

**Therefore, we do not agree with the Local Green Space Policy in its present form.**

**Movement & Access Policy: NO**

**Why? Road safety concerns in relation to the proposed LCWIP Cycle Route and absence of provision for a safer pedestrian route along Drove Lane.**

National Cycle Route N23 takes a very circuitous route to the centre of Alresford. The route of N23 avoids Winchester Road and The Avenue, due to the fact that they do not meet the required minimum safety standards to be considered to be part of a National Cycle Route. Whilst we would welcome the proposed LCWIP Cycle Route, for the protection of its users, we believe that the route it follows should be made to meet those minimum safety standards.

Equally, we are concerned that the proposal for SHELAA site NA07 would introduce a new junction on the path of the LCWIP Cycle Route on a stretch of road that already regularly experiences collisions. Any new junction would increase the existing risks.

We note that there is no provision for a safer pedestrian route along Drove Lane. This single track road is very popular with walkers, both from the town and visitors. It connects to the Wayfarer's Walk and several other public rights of way, including the Arle Valley Trail, a route that NATC has promoted over decades. It is the only regularly walked route in the town that receives no protection from a pavement; a hazard made worse by the fact that it is a single track road with passing places.

**Therefore, we do not agree with the Movement & Access Policy in its present form.**

## **Town Centre Policy: NO**

### **Why? The Town Centre Policy should seek to prevent business Use Class E outside of the Town Centre**

Whilst the draft policy reflects the importance of a cohesive Town Centre offering, it does not seek to protect the Town Centre from the negative impact of new businesses, such as shops and cafes, being established outside of the Town Centre. There is a long-established consensus that such businesses draw footfall from the Town Centre.

The arguments are well rehearsed. See for example, The Alresford Society's objection to the expansion of the cafe and other offerings of Long Barn (application 19/00619/FUL), which refers to "the debilitating impact of locating retail development outside the existing town centre." and the "negative effect on other local businesses, threatening instability and weighing down the viability of the town centre."

This objection goes on to state that, "The data pack provided by WCC for the Needs Assessments groups for the Local Plan says *'The demand for premises within New Alresford from national and regional retail and leisure operators is relatively poor. The town centre is dominated by independent traders. If independent traders close in the future the availability of new occupiers is uncertain and the number of vacant units could increase, which may undermine the vitality and viability of the town centre.'*"

In relation to a further application from Long Barn (21/01322/FUL), the New Alresford Chamber of Commerce commented that, "It has always been the Chambers' concern that the location will become a one stop shop (at agricultural rates, whereas other shops and cafes pay full rates) and customers will skip Alresford centre completely." We assume that the Chamber of Commerce will maintain this approach to any other such business outside of the Town Centre.

There are currently at least four shop units in the Town Centre that have been empty and available to rent on a relatively long-term basis; a clear indication of the pressures on Alresford's retail economy. It is essential that no new business premises usage should be allowed that will draw footfall away from the vital heart of Alresford's Town Centre.

**Therefore, in the absence of a policy aimed at preventing the establishment of new businesses under Use Class E outside of the Town Centre, we do not agree with the Town Centre Policy in its present form.**

## **Balance & Objectivity**

### **Accuracy**

Throughout this response, we have made every effort to refer to objective and factually accurate evidence.

In the event that anyone identifies any issue of fact that they believe to be inaccurate, we would ask that they address it to us and we will consider it immediately in order that we play our part in presenting balanced and objective material to the public during this Community Consultation.

We are hugely concerned that members of the public have been misled by, amongst other things, the written information provided by the landowner in person at the Community Consultation event and subsequently through its inclusion on New Alresford Town Council's website.

We have shared advice we have received from Locality with NATC. It includes the following extracts:

"Consultation and engagement activity should aim to provide the public with balanced and objective information" and it

"is unlikely to be an appropriate way for landowners/site promoters, or specific community groups to put in representations and convey their interpretation of the options considered using their own material."

NATC has not responded to us in relation to this and despite Locality's advice, it invited the landowners to attend with their own stand at the recent Community Consultation engagement day where they were apparently given free reign to tell the public whatever they wanted. Meanwhile, the Friends of Barn Meadow and any other interested community groups wishing to make their own case to those attending, were not allowed access to the venue.

The terms of reference for NATC's Neighbourhood Plan Committee provide it with a responsibility "To undertake the process in a democratic, transparent, and fair fashion." We do not believe that it has lived up to this basic fundamental requirement.

## **For the Record**

This response is the combination of a number of contributors. We are very grateful for each of their contributions. Thank you.

In the interests of full disclosure, its main author, Andy Sprott, is a member of New Alresford Town Council, the qualifying body for the purposes of the neighbourhood plan, and is a member of the council's Planning Committee. He has deliberately remained outside of the Neighbourhood Plan Advisory Group/Committee in order that he can help to protect this special site and has declared his interests from the outset and thereafter wherever it has been appropriate. This proposal is written in his personal capacity and not as a member of the town council. As should be obvious from the text, it is a response to, and should not be interpreted in any way as being endorsed by, New Alresford Town Council.

When reading this response, please note that the homes of several members, but by no means all, of the Friends of Barn Meadow adjoin this land. Therefore, beyond a love of the landscape, interest in the heritage and above all, the wildlife that this special green and blue space provides and supports on the edge of our town, some have a personal and/or pecuniary interest in the future of this land. However, this response comes from a sincerely held belief in the points raised.

## Appendix A

### Objection from The Alresford Society

#### - Planning Application 19/02128/FUL -

##### **19/02128/FUL - Redevelopment of redundant watercress beds at Abbotstone and building 10 units of holiday accommodation**

The problem with this application, of course, is that it has to address competing demands and the final decision (rightly, taking a long time to decide) will be difficult. This application sets economic development against growing environmental and ecological concerns in this sensitive rural setting. On balance, and whilst understanding the need to support the local economy, this application if permitted would be in breach of Policy DM13 – Leisure and Recreation in the Countryside, and DM23 – Rural Character, adopted by WCC in 2017.

Unfortunately, contrary to WCC policies, the development *will* create unacceptable visual and noise intrusion in the countryside, and the operation of the site *will* mean an unacceptable alteration in the character of the area, causing visual and noise intrusion and disturbing local wildlife, whilst traffic could pose a public safety risk on narrow roads in this area. Whilst it is thought that the proposed 10 new dwellings would be out of scale in this sensitive rural area, there are greater concerns about setting precedents for further, future development in the countryside. More details are given below.

**Ecology** – The proposed site is close to SSSI and SAC designated areas and there is significant potential for damaging wildlife – aquatic, including native crayfish, as well as land-based and birds. Danger is clearly recognised in the ecology response to this application, including the need for the most careful planning, implementation and stringent planning conditions if approved. It notes: *‘The Candover Brook is classified as a main river and therefore it should be conditioned that the appropriate environmental permits are attained prior to any works. Nutrients and wastewater entering the water course, including the European designated Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) are a concern, as result of construction and operational phases.’*

You are probably aware already that the Hampshire & IoW Wildlife Trust and many others are deeply concerned about excess water abstraction and poor water quality and its ongoing, negative impact on wildlife in and alongside the Itchen and Test. It is the lead body for a large partnership project ‘Watercress & Winterbournes: Landscape Conservation Action Plan’<sup>1</sup> that has just received (2020) a major heritage lottery award for the next five years to work with local communities to try to reverse the damage that has already been done and prevent future harm.

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<sup>1</sup> The Hampshire & Isle of Wight Trust was involved in the closure of the watercress beds here, which can cause problems with excess water abstraction and use of fertilisers. It can take decades to percolate through the aquifer, so pollutants introduced many years ago are still emerging on the surface today. The only solution is time and careful management of the landscape to prevent further pollutants from entering the system. This link takes you to the Watercress & Winterbournes Landscape Conservation Action Plan <https://www.hiwwt.org.uk/sites/default/files/2019-11/Watercress%20and%20Winterbournes%20LCAP%20combined.pdf>



Nitrates can also be increased by development, a problem that Winchester City Council recognises and is still grappling with. It causes damage to the ecosystem, especially as the existing water course will seemingly be used to drain surface water from this site. Foul sewage is described as being treated by the construction of the wetland and reed bed, also the water course, and a further concern.

In its position statement on nitrates pollution, Winchester City Council has '*recognised problems from nitrate enrichment; high levels of nitrogen from human activity and agricultural sources in the catchment have caused excessive growth of green algae (a process called eutrophication) which is having a detrimental impact upon protected habitats and bird species*'. Causes include '*... direct or indirect habitat loss, air pollution, water pollution, increase in recreational disturbance, light pollution... or construction activity*'<sup>2</sup>.

Whilst it is also noted that conditions can be applied to any permission and a Habitats Regulations Assessment is proposed in the ecology response, including consideration by Natural England, which raised the nitrates pollution problem in the first place, this development would effectively undermine the '*Watercress & Winterbournes*' project and very significantly increase future development risks for the whole catchment areas of the Test and Itchen, including excess water abstraction.

**Traffic** – It is feared that the Hampshire Highway's comment seriously underestimates the amount of existing and, particularly, future mechanised traffic that this development will generate if permitted and how it impacts local narrow roads. The road is largely single track and dog walkers, ramblers, horse riders and cyclists frequent it, and in increasing numbers. It is already used – at speed - as a cut through to the A30, whilst visitors, their guests and deliveries to the proposed new development will generate significant increases in traffic, contrary to sustainable tourism intentions.

**Local economy gain** - The WCC Economy & Tourism team and Alresford Chamber of Commerce are, not surprisingly, supporters of this application. The District strategy for economic growth is relevant here, although the strategy 2010 - 2020 is nearly out of date and it is hoped that growing concern with environmental matters will be better recognised in future strategic planning and reflected in the decision taken here.

This development would bring some seasonal benefit to the local economy, although modest in scale, perhaps cafes, pubs and restaurants primarily, as shops are not in walking distance for shopping, whilst parking can often be difficult. Delivery companies for major supermarkets outside the immediate area are more likely to benefit (and increase traffic too, of course). The suggested addition of 5 jobs will be equally seasonal and are described as P/T anyway.

**Future development** - A major concern would be future development of this sort, whether a further expansion on this particular site or others in the wider area. Once the principle is accepted, it is more difficult to object in future. There may also be a question of whether the proposed development is financially viable (value generated vs. cost of developing it) and local objections already lodged on the WBB website question this because of the concerns it raises about subsequent expansion.

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<sup>2</sup> Winchester City Council Position statement on nitrate neutral development – February 2020

**Sustainability** - The idea of Sustainable Tourism is to make a low impact on the environment and local culture. Light and noise pollution, increased water pollution and abstraction, and reduced dark night skies are all of great concern and would seriously spoil the amenity of local residents, together with attendant impact on wildlife. Planning conditions controlling these in holiday settings are, perhaps, particularly difficult to enforce.

It is sadly ironic that the area is a magnet for visitors *and* local residents who seek tranquil countryside where important footpaths and chalk streams converge and there is still much varied wildlife. This development and future expansion would help to disrupt the very things they seek.

**Jan Field**

**Chairman, The Alresford Society and Friends of the Arle**

## Appendix B

### Ecology - Habitats Regulations Assessment Advice

#### Site Specific Advice – Barn Meadow, Drove Lane, New Alresford

Barn Meadow ('the site') represents functionally linked land and offsite supporting habitats for the adjacent River Itchen SSSI and the River Itchen SAC. Both of these sites are listed within the National Site Network and receive the highest levels of legal protection.

The proposals risk adverse effects to the integrity of both the SSSI and the SAC qualifying features. Adverse Effects of the Integrity of the SAC are likely to be associated with:

- Physical loss of or damage to habitats e.g. from development or associated activities within the Habitats Sites themselves and crucially within offsite functionally-linked land;
- Non-physical disturbance e.g. noise, vibration or light from construction or development in close proximity to sensitive species;
- Non-toxic contamination, considered as 'Air Pollution' e.g. from creation of dust which can smother terrestrial habitats, affect turbidity of aquatic habitats and contribute to nutrient enrichment;
- Recreation pressure e.g. dog walking, cycling, trampling, littering, fire, predation by pets, and crucially, through disturbance of sensitive species;
- Introduction of invasive species (both plant and animal), particularly associated with public access.
- Changes in water quality or quantity e.g. changes in flow caused by accidental pollution, run off and discharge, during both construction and operational phases.

A Habitat Regulations Assessment would be required, by law, to be completed by the Competent Authority to determine whether the Barn Meadow proposal would result in adverse effect on the integrity of the River Itchen SAC. This is judged in terms of the implications of the project or plan for the SACs 'qualifying features' (i.e. those Annex I habitats, Annex II species for which it has been designated). **Significantly, HRA is based on the precautionary principle. The level of uncertainty requires that it be beyond reasonable scientific doubt. Where uncertainty or doubt remains, an adverse effect should be assumed.**

The HRA will need to be completed in accordance with relevant case law. For example, the *Holohan v An Bord Pleanala* (November 2018) judgment which stated that:

*“Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘appropriate assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and **the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site**”[our emphasis].*

Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat will need to be considered in the HRA, in line with the High Court judgment in *RSPB and others v Secretary of State and London Ashford Airport Ltd* [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

*“There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a protected site is to be ignored. The indirect effect was still protected. Although the question of its legal status was mooted, I am satisfied .... that while no particular legal status attaches to FLL, **the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence** [our emphasis]. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice”.*

Barn meadow represents functionally linked habitat for the SAC qualifying features (e.g. southern damselfly and otter). The activities associated with the proposals would result in adverse effects on the integrity of the SAC and SSSI associated with the impact types listed above, including both onsite and offsite impacts. These impacts, particularly those associated with public access, are unlikely to be capable of being mitigated. The levels of doubt associated with the ability to avoid or mitigate impacts are such that a conclusion of no adverse effect on integrity could not be reached and therefore the provision of this development would not satisfy the requirements of the Habitats Regulations.

David Green *MCIEEM*

Member of the Chartered Institute of Ecology & Environmental Management  
Professional Ecologist with 20 years experience