

23rd June 2025

REF: TBME1001

Nature Recovery Hampshire
Hampshire County Council
Winchester
The Castle
Upper High Street
Winchester
SO23 8UJ

Dear Sir/Madam

Objection | Draft Local Nature Recovery Strategy for Hampshire

Gillings Planning has been instructed by our clients, The Trustees of the Barker-Mill Estates (TBME), to provide a formal response to the consultation on the draft Local Nature Recovery Strategy for Hampshire.

These representations respond both in general terms to the draft document and specifically in relation to land holdings with development potential, and potential for a variety of other important infrastructure projects, that would be directly impacted by the proposed Strategy. Please note that the online forms have also been completed with cross reference to this letter and its appendices.

The Trustees of the Barker Mill-Estates

The Barker-Mill Estates consist of land in Hampshire owned and managed by the Barker-Mill family and its Trustees. The Barker-Mills have deep and long-established roots in the county having been local landowners and prominent figures in community life for over 500 years.

The ongoing vision for the Barker-Mill Estates is to help make areas in and around Hampshire better places to live, work and spend time. Today the family and its Trustees continue to look after estates to the west of Southampton and in the New Forest.

The Barker-Mill Estates covers considerable landholdings across Hampshire (circa 4,000 acres). This includes 1,500 acres of woodland including one block of woodland that is 1,000 acres in size. These landholdings incorporate a wide range of habitat types including:

- Farmland
- Woodland
- Coastal areas
- Riparian habitat

In addition, the estate owns and manages hundreds of residential properties and commercial premises. The Estates team therefore has considerable experience managing a variety of habitats and properties and it approaches this management in a responsible and conscientious manner. For example, over 1,000

acres of woodland is currently covered by the Natural England Countryside Stewardship Scheme to ensure the woodland is sustainably managed and the biodiversity increased over the life of the management plan. In addition to existing management responsibilities, the estates have considerable experience in bringing land forward for development with landholdings historically allocated for development or currently proposed for allocation in emerging plans across the Hampshire area.

TBME are therefore a responsible and community minded landowner who balance a number of conflicting management challenges across large tracts of land many of which are in sensitive locations.

These representations raise substantial concerns with regards to the draft Strategy and its purpose with particular regard to sites that are proposed for allocation within a number of emerging local plans.

Our representations respond only to the final question on the consultation forms:

“Is there anything else you would like to tell us about the draft LNRS, including the appendices”.

TBME supports the principle of nature recovery and as mentioned previously, undertakes conscientious land management practices across its landholdings.

Our objections and concerns however relate to the following key issues:

1. The inadequate level of consultation and engagement carried out to date with TBME as a key landowner within Hampshire and the insufficient time given to respond in a meaningful way given the scale of the areas in question.
2. The extent to which the proposed areas of improvement are underpinned by a robust evidence base.
3. The potential serious and harmful implications of the proposals on the allocation of land across various Local Planning Authority areas within Hampshire and the effect this will likely have on the Government’s growth agenda.

We take each of these points below in turn.

Consultation

As noted above, TBME are a considerable landowner within the Hampshire County and yet were not directly consulted as part of the strategy preparation process. One, 6-week, official public consultation exercise provides very limited opportunity to interrogate proposals across a large area of land and provide full comments and/or rebuttals or instruct survey work if required.

In this regard, the overall timescales for a document that potentially has a wide range of serious implications are somewhat compressed with no opportunity to respond to a second draft of the document following the receipt of representations. As such, the consultation process appears akin to a ‘box ticking’ exercise rather than a genuine consultation with stakeholders where representations will be taken into account and may influence the content of the published Strategy.

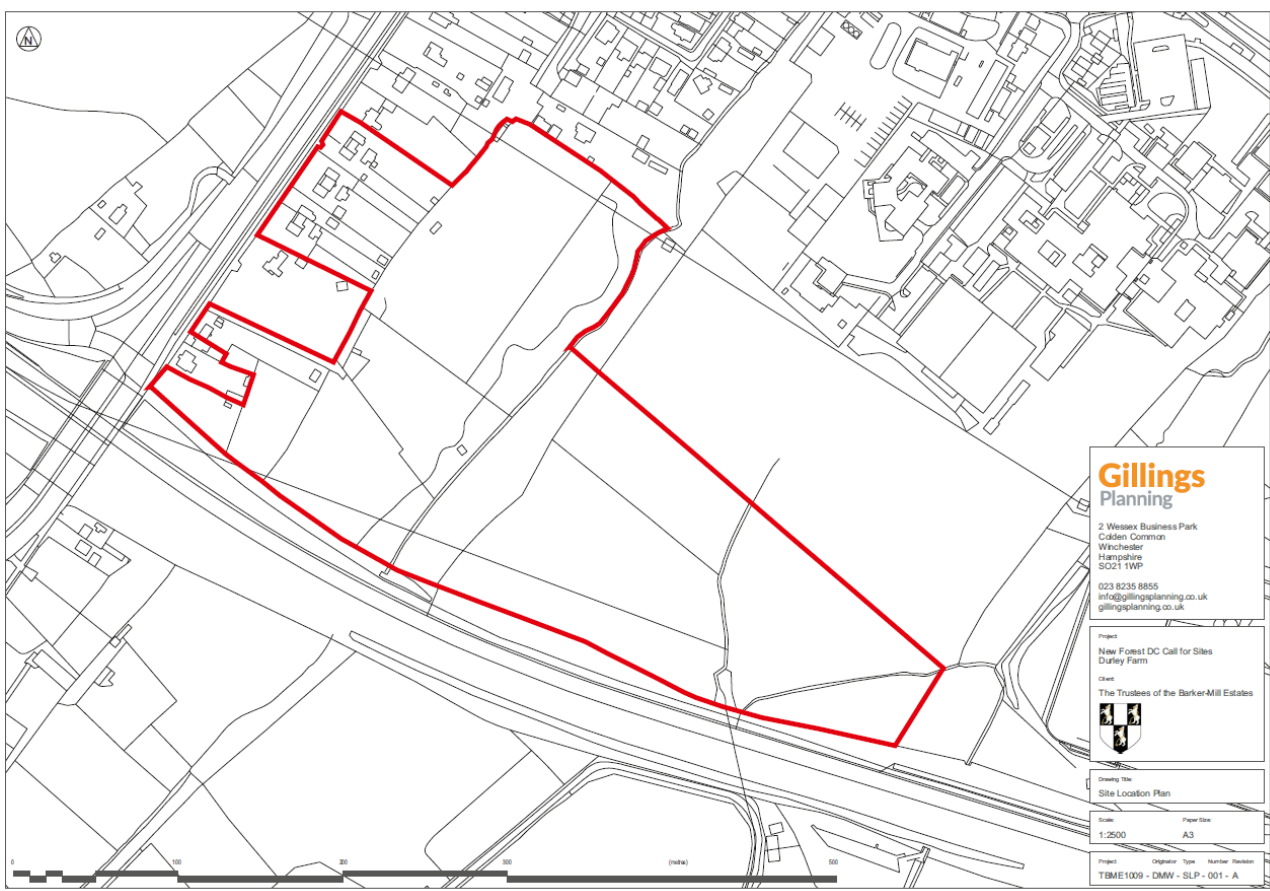
TBME would therefore urge those preparing the Strategy to undertake a second stage of consultation. In the absence of a second stage of consultation and at the very least, an invitation should be extended to

the TBME team to meet and discuss the implications across its landholdings to ensure the strategy is prepared in an effective way.

Evidence Base

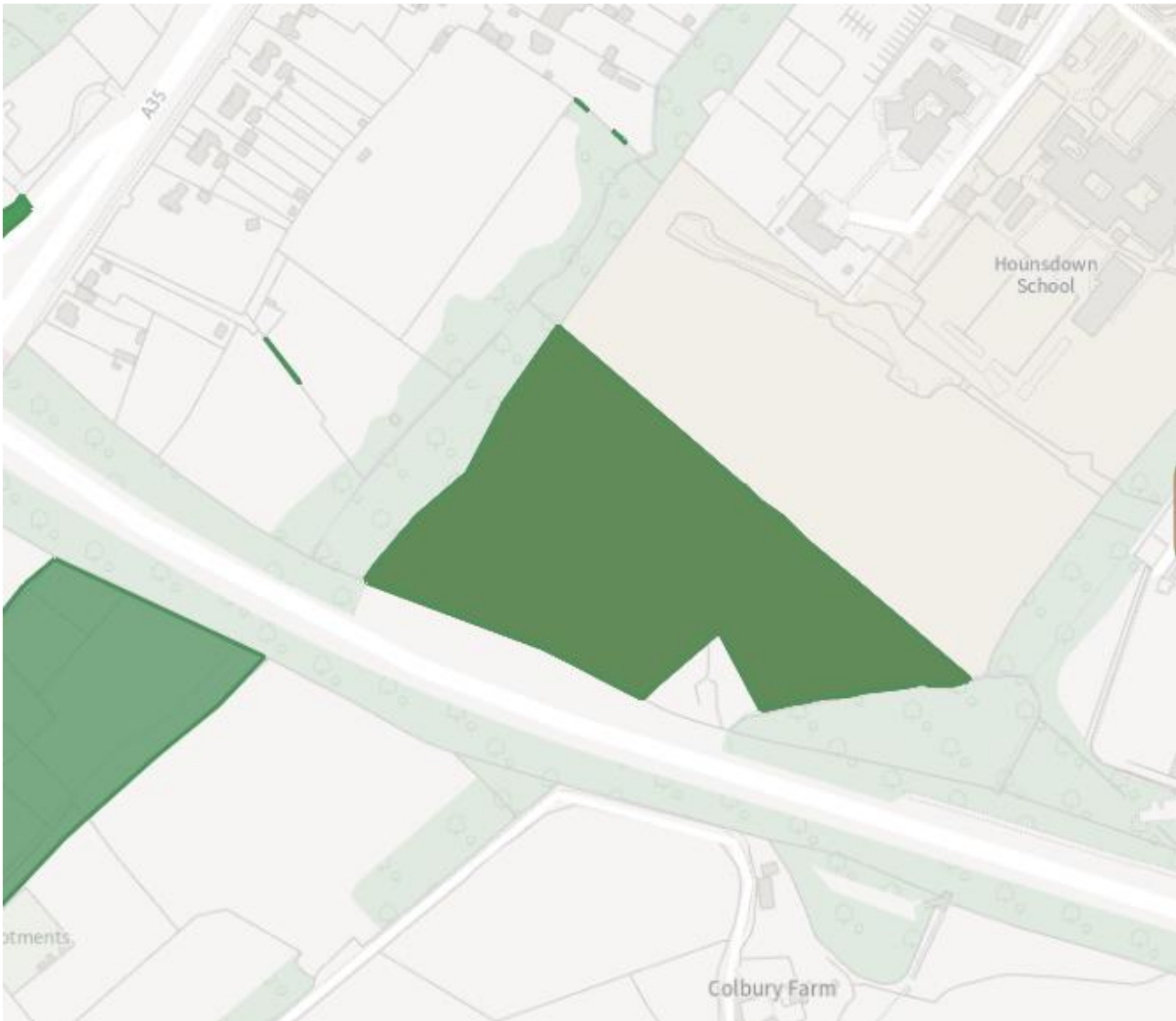
The proposed Strategy mapping has implications for large areas of land owned by TBME. The TBME team and their sub-consultants would be happy to discuss the wider landholdings with the team preparing the Strategy. In this regard, our immediate concerns relate to those sites that have been put forward for potential allocation in the various Local Plans currently under preparation across Hampshire. Maps of those sites submitted to recent Local Plan ‘call for sites’ stages are attached as an appendix to this document.

Our concerns in this regard relate to what we consider is a total lack of an evidence base used to underpin and identify areas of “particular importance for biodiversity”. Specifically, it is unclear what information has been used to inform the identification of land affected by the Strategy.



Durley Farm Site Location Plan

As an example, at Durley Farm in Totton (above), a large parcel of the site is identified as an area that could become of particular importance for biodiversity. It is unclear from the information provided in support of the Strategy why this specific area has been highlighted. The identified land does not correlate with the existing SINCC and TBME are not aware of any other ecological survey information that is available that would justify its inclusion in this way. There is no evidence to justify the position of the shape drawn; it appears to be drawn up totally arbitrarily.



Nature Recovery Strategy Extract for Durley Farm

This same objection applies to many TBME land holdings across the strategy area that have potential to be brought forward for various forms of development, infrastructure and supporting areas of open space, allotments and nutrient mitigation land. A selection of those sites most directly affected at this time are set out at Appendix 1.

Concerns are also raised in relation to the proposals shown at Ashley Clinton Farm (see Appendix 1) where the imminent approval of a minerals consent does not appear to have been taken into account.

New Milton Sand and Ballast lodged an application to HCC as the minerals and waste authority on 16th June 2022 seeking permission for *“the extraction of sand and gravel, restoration using imported materials to agriculture, enhanced ecological interest and public access and roundabout improvements to access the A337”*. The application was validated on 7th July 2022 and assigned reference number HCC/2022/0338. The application was approved by HCC on 13th November subject to the signing of a S106; which is due to be signed shortly.

The proposed Nature Recovery Strategy is not deliverable in this regard and the draft should be edited accordingly.

When the identification of land in this draft strategy could have implications for the allocation of land and/or influence the way in which a site might be masterplanned and/or developed, it must be underpinned by a robust evidence base to justify its identification. We see no information to suggest that this has been undertaken.

Put simply, this raises very serious concerns about the preparation of the strategy and raises the prospect of planning blight and raises the risk of Judicial Review.

Allocation Implications

As those preparing the Strategy are no doubt aware, a number of Local Planning Authorities across Hampshire are in the process of preparing new Local Plans or undertaking a review of an existing Local Plan.

As noted, a number of sites owned by TBME have already been put forward for potential allocation and there will likely be other sites in the future that will be proposed for allocation.

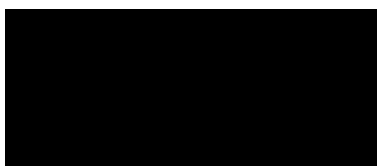
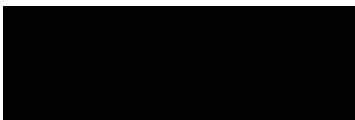
Without a robust evidence base, it is unclear why specific areas have been identified and therefore what the precise implications are for both allocation and/or the development of those affected sites.

We note that 'supporting authorities' will be further consulted on the Strategy in September 2025 however this is on the 'final LNRS' so it is unclear what influence this consultation exercise will have on the document before it is published. In any event, a number of LPAs will not know at this point which sites will be taken forward for allocation to meet their objectively assessed needs. As such, we are concerned about what influence the Strategy will have on this process as it would appear to add an additional layer of conflict to consider in the process of allocating land for much needed housing and/or commercial development.

As responsible landowners, TBME supports the principle of improved biodiversity but objects to the processes underpinning the preparation of this Nature Recovery Strategy specifically in relation to consultation with landowners and its evidence base. Consequently, TBME also objects to the identification of proposals within its land holdings where land may potentially be allocated for future development – particularly in light of the concerns around the lack of evidence base to justify these proposals.

We urge officers to meet us so that we can discuss our concerns.

Yours faithfully



Enc. Appendix 1