ALTON TOWN COUNCIL

Planning Committee, 21 October 2026

Supplement

5. WRITTEN REPRESENTATIONS FROM THE PUBLIC

Two representations have been received regarding Item 8.

18th October 2026

For the attention of the Town Clerk, and Alton Town Council Planning Committee

From Carol Palmer, resident Treloars Estate

Dear Mr Horwood and Councillors,

I am writing to submit my comments on Agenda Item 8 (EHDC-26-0331-CONVR) in time for circulation prior to the Extraordinary Meeting of the Planning Committee on Wednesday 21st October.

I fully support and endorse Alton Town Council's (ATC) letter to EHDC of 14th May 2026, and would refer you to my own to yourselves of 13th May 2026, both of which still apply. I have included my letter of 13th May at the end of this one.

Here is a link to the letter of 30th September 2026 from Derek Finnie Associates (DF), Crest Nicholson's ecologists to Richard Natt, Case Officer, EHDC, which I comment on below given this letter represents the case for the re-profiling works:
https://drive.google.com/file/d/1n4fKVWXbOxly3Qmh-e5qi18fSexDUI2t/view?usp=sharing

The explanation by Crest back then is still relevant i.e. that one of the reasons for submitting the application is that there is a large excess of topsoil on site, which would require approximately 300 lorry loads over a six-week period and likely cause significant disruption for residents. I would also like to point out that Crest has applied for and been granted by EHDC an increase in height of the Finished Floor Levels, which speaks to spoil having been put under the houses to get rid of it, such is their desire to save money.

Argument No 1: DF start their letter of 30th with an argument supporting re-profiling based on the supposedly poor quality of our grassland. While this is perhaps true

against some scales (although they are referencing one from 1992), this could be seen to be dredged up to suit their purposes in saving money.

I don't agree that this argument supports disturbing any of the 20% of grassland in that area that currently remains free of disturbance – which they say is 12% as they already have approval for works to some of it, presumably 8%. (12% from 20% = 8%).

They carry on, on the first page to say 'the species richness across the reprofiled area has been shown to be relatively low' and that 'there is a possibility' that the biodiversity is being suppressed in the area because of the soil conditions. So there is ***only a possibility*** that this is happening. **Hardly a strong argument to support 'works' to dig up a whole swathe of grassland and disturb its *current* biodiversity.**

Argument No 2 is that continuing to manage the area as a hay meadow means there is 'unlikely to be a significant change in the value of the grassland'. Plus it is not species rich enough to be classified as a SINC apparently. However they talk on page 3 about keeping the long term management as it is now or was – under Crest's regime it's been irresponsibly managed – not cut at right time if at all and we can't check whether arisings have been removed. The resident members of the Developers' Liaison Committee were removed by the current Managing Director and so the committee has been effectively disbanded. EHDC is supposed to meet regularly with Crest.

So the question is: how much has Crest contributed to the decline in the biodiversity of the grassland that they are now trying to use the status of to 'put right' with the incomprehensible 're-profiling' works – see my comments below.

Argument No 3 concerns reptiles. Their data comes from the *pre-development* site. They conclude that the re-profiling area does not accommodate an exceptional population of reptiles. Personally I don't see how they can use this argument as I imagine any reptiles would have been removed by the reptile fencing Crest put up (thought that was the purpose) and the rest would have got out of there with all the building going on. So there may have been some but I doubt there are now. This argument is designed again to say 'poor biodiversity = ripe for re-profiling'. Later, on page 3 they talk about 'temporarily excluding' any reptiles during the works. Poor reptiles having to go through this disturbance again, if indeed there are any left. Seems barbarically unnecessary.

Proposed Status: they want to increase the calcareous (chalk) content of the soil to produce lower nutrients to increase species diversity. I would prefer that they just left it alone! It is what it is. It doesn't need improving.

They go on to say that the 'existing top soil would be removed and stored in low level stock piles .. prior to the works commencing'. Well there are *already* piles of soil on the

site. I thought they were trying to find somewhere to put their top soil but now they're talking about *removing* the top soil. Surely this is more work for them?

Then they say 'this [top soil]' will be 're-spread across the top of newly prepared, chalk rich sub soil'. So they've dug up top soil and sorry, they are now '*preparing'* chalk rich sub-soil?? It doesn't make any sense. They're digging up top soil to put it back on top of this sub soil. **How does this sub-soil get exposed in the first place?**

So that paragraph at the top of page 3 needs a careful read through because it really doesn't make sense (to me anyway). And this is the only paragraph that explains what 'the works' will actually involve.

DF then talk about 'micro-reprofiling works' creating a 'variety of slopes' and support this with a comment that this was originally 'requested by the Butterfly Conservation Society' in 2019. **Where is the proof?**

DF talk about the 'works' providing an enhancement of the grasslands and 'contributing to a district-wide network of valuable wildlife sites' etc etc. Well what with the grasslands around Ackender Wood being either built on, or having applications to build on, I don't think that this statement is accurate. It does **NOT** justify 'the works' in my view.

Finally they say that the 'micro-profiling' works will create mounds and increase the diversity of ecological niches present, and reduce the fragmentation of existing habitats and improve species' resilience to the effects of climate change by making provision for habitat adaptation and species migration' !!

Let's throw the kitchen sink at this is how it reads. This is laughable, and DF have provided NO evidence that any of their 'works' would result in any of the outcomes they present in this letter.

By carrying out any works at all they are *destroying* in order to *re-create*. It makes NO sense, unless one looks at the financial implications for Crest Nicholson of *not* doing it.

Personally given DF's poorly written letter and dubious contents, I have *no confidence* in the arguments they present nor any understanding of the garbled description of the works required and consider that their true motive of saving money is poorly disguised.

And I strongly OBJECT to this planning application.

With kind regards,

Carol Palmer

Alton Town Council Full Council 13th May 2026

Written Representation from Carol Palmer re Item 6.1

Dear Councillors,

Item 6.1 EHDC-26-0331-CONVR, Land at Lord Mayor Treloar Hospital Site Chawton Park Road, Alton, Hampshire

Until recently, when Crest Nicholson (CN) disbanded it, I had been a member of the CN Developer's Liaison Committee representing the residents of the Treloars Estate since Jan 2020.

There are two issues concerning this application that I want to write to you about.

1. "Country Park" management and ownership

The understanding was that the 'country park' - see graphic – the bit top right where CN aren't building – was to be managed by Alton Town Council (ATC). The expectation was that ATC would be given the Country park along with possibly some funds to take it on and maintain it.



What I refer to as the 'hedge'

©Derek Finnie Associates

Please see the **Ecology Management Plan of March 2026 (EMP)** submitted to the EHDC Planning Portal, for the background to my concerns and comments. I have included a link to it here for ease of reference. https://bit.ly/AckenderHillEMP. NB any bolding in the quotes from it below is mine.

At 2.2.2. it is stated that "The management of the Country Park, which comprises the majority of the ecological enhancement measures, **will be undertaken by an independent charitable trust, as described in the Section 106 agreement**. The charitable trust, who will possess the appropriate level of knowledge and expertise to manage such an area, will be established prior to the occupancy of Phase 5 of the development. The Country Park will then be management [sic] in perpetuity by the established charitable trust in line with the following document and the Country Park

LEMP. The management will be funded by the Country Park Contribution, as defined by the Section 106 agreement."

So this statement is within the Ecology Management Plan which is on the EHDC Planning Portal, yet Hannah Robbins (ex-Chair of our disbanded CN Liaison Committee) has informed us that: "**As far as Crest is aware, Alton Town Council will still take over management of the Country Park once it is handed over, and it will not be transferred to another charitable trust. They are unsure where this information originated.** The park will remain open to all and not solely for Ackender Hill residents."

My comments

It is shocking that Crest have allowed an incorrect and misleading document to be submitted to the EHDC Planning Portal, (if true). And they should be requested to resubmit a corrected document if that is the case. **It is vital that ATC find out the true future status of the Country Park intended by Crest.**

I have asked Hannah Robbins to speak to Richard Natt, the Planning Officer about the incorrect document and she has said she will do this.

It is also vital that we understand whether the Country Park they talk about above is the *whole* of the unbuilt area to the left ('western') and right ('eastern') of the 'hedge' (see graphic above). It is surely the whole of it but this needs to be clarified I think.

It is worrying that a Section 106 Agreement is referred to as I assume this Section 106 Agreement has been already 'agreed'.....

2. CN Strategy for the calcareous grassland Country Park

The EMP states at 1.1.4 that it presents 'an alternative strategy for the calcareous grassland areas within the Site'. They also say at 1.3.2 that an opportunity has arisen to 'increase the amount of calcareous soil in the Country Park' .

At 1.3.3 they say they will "temporarily exclude reptiles from the area that will see the reprofiling works."

At 3.4.2. they say "However, due to the proposed re-profiling and soil improvements works proposed within the western section for the Country Park (See section 8) there is a need to temporarily exclude reptiles from this area to prevent any harm or injury to individual reptiles. To this end, it is proposed to conduct a second capture and exclusion exercise in summer 2026 to temporarily remove reptiles form [sic] the proposed works area."

At 3.8.4. they say "Incorporating this much new material will raise the existing ground level by approximately 400- 500mm. However, the soil will not be spread evenly over the existing contours. **Instead, a varied landscape will be created which will result in numerous different gradient and aspects**; these will provide a variety of niches that can be exploited by numerous different species (see David Jarvis Associates Drawing 2610-4-5-9 DR-003 S4-P1 for details).

Hannah Robbins at EHDC who chaired the Liaison Committee and has regular meetings with CN has told us:

Crest have explained one of the reasons for submitting the application is there is a **large excess of topsoil on site**. Removing it entirely would require approximately 300 lorry loads over a six-week period, which would likely cause significant disruption for residents. By redistributing some of the topsoil across the Country Park, the number of lorries can be reduced to around 50.

Crest has been consulting with an ecologist, as there are **newts present in the areas where the topsoil is to be redistributed**. These will be safely relocated to another part of the Country Park before works begin. Crest has confirmed that they will aim to retain as much natural wildlife as possible and minimise disturbance to wildflowers.

My Comments

Re-profiling

So Crest are trying to dress up the (probably) real reason for dumping spoil on the Country Park as an 'opportunity to increase the calcareous soil' there, to encourage different species, and to save disruption to the residents of their new development Ackender Hill. **What is probably really going on is that they want to save money.**

Section 8?

At 3.4.2 the EMP mentions a Section 8 regarding 're-profiling ' etc but there seems to be *no* Section 8 in this document. Maybe I've missed it.

Newts

So more disturbance for the poor newts and how many will die in the process of translocation/reptile fencing erection – all to save residents from 350 lorry journeys. And the current 'eastern' area of the Country Park (to the right of the 'hedge') is suffering from a lot of disturbance already – see photos here from local resident. **Does this look like a safe place to relocate newts? I don't think so. Is there enough space for the newts to thrive anyway given that there must already *be* newts in that area?**







Flora Disturbance/Destruction

It seems to me that CN's plan is for all the orchids and wild flowers that have been growing in this chalk wildflower meadow to have a layer of 'top soil' chucked over already existing grassland and for it to be at different levels to produce a 'contoured' finish. We need to know if this is the actual process, and if so, what effect will it have on the flora already growing there. It could mean wholesale destruction of a beautiful area that was awash with flowers and insects including Marble White butterflies. The question is: how long would it take for the wildflower meadow(s) that have lain undisturbed for over 40 years to re-establish? This proposal sounds like taking advantage at the expense of our fast disappearing chalk wildflower meadows and associated flora/fauna.

A resident on our Treloars Estate has commented that:

"I am pretty sure Crest Nicholson have ruined the meadow already. Many hundreds of tons of spoil have been dumped and moved around the meadow (or our country park) for over a year with no thought of what damage it is doing and the disruption it has caused."

Confidence in Crest/Whips

We have absolutely NO confidence in any promises or commitments made by Crest given the above comment and the appalling negligence they displayed when they didn't water the whips and most of them died. They then replanted them and many died for the same reasons.

Hannah Robbins has told us: The WHIPS are currently located within Crest's compound areas. Once these compounds are removed, the WHIPS will be replanted and maintained.

My Comments

Presumably the 'whips' are the replacement ones for where they need to be replanted.

It has been hugely depressing monitoring things like the whips that were left to die. And now we have to continue to monitor what Crest are doing to ensure they don't destroy more of this beauty than is absolutely necessary.

Here are some legal references that could be relied (perhaps) on to stop Crest doing this:

Wildlife and Countryside Act 1981, section 13: it is an offence to intentionally pick, uproot, or destroy a wild plant listed in Schedule 8, and it is also an offence for unauthorised persons to uproot any wild plant. This is the clearest direct anti-destruction provision for sensitive meadow flora.

Wildlife and Countryside Act 1981, Schedule 8: this schedule lists specially protected plant species, many of which can occur in chalk grassland and other wildflower habitats. If a meadow contains any of these plants, destruction can trigger criminal liability. Please EHDC, check whether there are any Schedule 8 plant species in this area. Presumably this was information that was documented before work started?

National Planning Policy Framework, paragraph 193: where significant harm to biodiversity cannot be avoided, mitigated, or compensated for, planning permission should be refused. That is highly relevant where a chalk wildflower meadow is being removed for development. Planning permission should never have been granted of course but let's refuse this application. It's the least we can do.

NPPF paragraph 192: planning policies should safeguard local wildlife-rich habitats and promote conservation, restoration, and enhancement of priority habitats and ecological networks. Chalk grassland is commonly treated as a priority habitat in planning and conservation policy.

Natural Environment and Rural Communities Act 2006, section 40 biodiversity duty: public authorities must consider what they can do to conserve biodiversity. That duty supports arguments against publicly funded or publicly authorised destruction of valuable meadow habitat.

In conclusion my own objection on the EHDC Planning Portal has this final paragraph:

I object to the proposed destruction of this chalk wildflower meadow because it would cause unacceptable and potentially unlawful harm to a valuable biodiversity habitat. The proposal appears contrary to the Wildlife and Countryside Act 1981, including protections for any protected plants present, and would also run against the National Planning Policy Framework, which says significant harm to biodiversity should be refused where it cannot be avoided, mitigated, or compensated for. It is also inconsistent with the public biodiversity duty under the Natural Environment and Rural Communities Act 2006. The meadow should be retained and protected in situ, with any decision based on a proper ecological assessment and a presumption in favour of avoidance rather than loss.

With kind regards,

Carol Palmer

Resident Treloars Estate

From: Doug Male

Sent: 19 October 2026 12:40

Subject: EHDC-26-0331-CONVR – Comments for Alton Town Council Planning Committee, 21 October 2026

MY REPRESENTATION ON THE APPLICATION

I object to the proposed changes to the Country Park for the following reasons.

1. Use of surplus construction material

The proposal would use more than 10,000 cubic metres of surplus excavated material from the housing development to raise and reshape existing Country Park grassland.

The original 2019 Country Park Landscape and Ecology Management Plan provided for retaining existing grassland where practicable and improving its diversity through management. The developer's March 2026 Ecology Management Plan acknowledges that the proposed earthworks depart from the original approach of retaining the grassland intact.

The availability of surplus material from the housing development is not, in itself, a justification for depositing it in the Country Park.

2. The Country Park as a whole

The developer's letter of 30 September 2026 states that approximately 20% of the Country Park would be reprofiled, with additional grassland disturbance of approximately 12% after accounting for previously planned works.

The Country Park was presented as a single area of public open space, incorporating existing habitats, new planting, paths and recreational facilities. The proposed changes to ground levels and ecological management should be considered in that wider context, including their combined effect alongside the original proposals.

The Environmental Statement Addendum acknowledges increased adverse ecological impacts in the short term, while predicting longer-term improvements. But without the full context there is little to support, judge or assess that assertion in isolation.

3. Piecemeal presentation of the proposals

The application seeks to vary two connected conditions covering ecological mitigation and approved ground levels. The revised levels would accommodate surplus construction material, with ecological enhancement presented as the justification.

Information has been provided through successive plans, reports and correspondence, but there is no sufficiently clear, consolidated presentation of the resulting Country Park scheme showing the original arrangements, previously planned works and changes now proposed.

This makes it difficult to assess the full implications of the variation or understand the basis for the distinction between 20% reprofiling and 12% additional disturbance.

I do not see how these plans can be approved until the overall picture has been presented. I am concerned that this is representative of selective consultation on this development, whilst other changes/amendments are not open to public scrutiny or comment.

MY EXPERIENCE OF THE DEVELOPMENT AND ITS IMPACT ON EXISTING RESIDENTS

I have lived at [redacted] since 2004, [redacted].

My involvement with the Ackender Hill development goes back to the original planning process. As early as 2017, I was corresponding through Councillor Graham Hill about the management of the boundary adjoining the proposed Country Park. During the planning process, I also raised environmental concerns, including the protection of existing grassland and butterfly meadows and questions about proposed changes to habitats.

In March 2025, I contacted Councillor Ginny Boxall and EHDC about the proposed sustainable drainage basin (Basin 2) immediately beside our property. We had already observed surface water runoff from construction and were concerned about the potential impact on existing homes downhill from the development, including foundations, garages and drainage arrangements. We were not opposed to the basin in principle; we sought assurances that neighbouring properties would be protected. On 20 March 2025, Crest Nicholson assured us, through EHDC, that it was taking necessary precautions to prevent consequential impacts.

In January 2026, uncontrolled surface water runoff from the development caused flooding and damage at our properties in [redacted]. Gardens, paths, patios and garages were affected. These events are documented in photographs and correspondence with Crest Nicholson and EHDC. Crest's regional build manager and team visited in February.

Corrective action subsequently taken on site stopped the runoff despite further rainfall, but remediation of the damage remained unresolved. We have since been given no assurances (and clearly previous assurances were not proven to be effective) on preventing a repeat of that incident (let alone making good on the damage caused) and the continued building and lack of contact leaves a lasting impression of disinterest in what happened and its consequences. For our immediate part of the estate, it is also an

issue of drainage capacity. Any surface run-off on our part of the estate is only handled through soakaways. We are not connected to any main infrastructure to handle this - and therefore capacity is very limited. When CN came to remove the original water/chalk/mud there was nowhere for it to go - they had to physically remove it from the site and flush what was left through the foul waste pipework causing other issues.

Another significant issue concerned the water supply to the existing [redacted] estate. Since its construction in 2004, our estate had been supplied from Headley. A pressure-boosting station was installed at the entrance to our estate because the existing water pressure was insufficient to support the new Ackender Hill development. Following these works, residents experienced a marked change in water quality, including taste, chalkiness, rapid limescale build-up and increased hardness. My enquiries with South East Water established that our supply had been switched from Headley to Swainshill without residents being notified.

I pursued the matter with South East Water on behalf of more than 180 affected households, as well as raising a formal complaint with the Drinking Water Inspectorate. In its response of 1 February 2026, South East Water apologised for failing to notify residents and explained that the original supply could not be restored because the new booster system depended on the revised arrangements. I also challenged the continued publication of inaccurate information identifying Headley as our water source. This was a significant infrastructure change arising from the new development, with consequences for existing residents who had neither been consulted nor informed.

As construction progressed, I also raised concerns about changes to the contours of the hillside, the use of chalk excavation material to raise land along the eastern edge of the development, and changes to ground and finished floor levels of the housing being built that did not correspond to anything in the public domain/planning portal. This was not from general concern but witnessing first hand the works being carried out as my property directly overlooks them and living with the noise and vibrations as they were carried out. These matters are relevant to drainage/flood risk and privacy, as well as to the broader loss or disturbance of existing habitats and grassland. Along with other residents, I shared photographs and comparisons with approved plans with EHDC.

In October 2026, EHDC confirmed that revised finished floor levels for plots near existing [redacted] properties had been approved through the planning conditions process without consultation with those affected. That raises further questions about the scrutiny of changes with consequences for neighbouring homes when looking at housing in isolation and not the consequential impact of that elevation change on earthworks, drainage and planning. I have now had to request further information through a Freedom of Information and look forward to getting greater transparency from that.

My concerns are broader than direct impact on my property. They concern the cumulative environmental, infrastructure and social effects of the development on the existing community, and the difficulty residents face in understanding and responding to changes made through successive applications, conditions and revised plans.

These are not hypothetical concerns about what might happen as a consequence of development. They are documented examples of impacts that have already occurred, affecting established homes and residents.

Photographs and videos of the January 2026 flooding are available here: https://drive.google.com/drive/folders/1ro7ytuY2wvnEeQPmkvV8t68RXkLnyHSz?usp=sharing

I have supported the protection of the Country Park's grassland and habitats from the outset. Against this history, the latest proposal to deposit more than 10,000 cubic metres of surplus chalk and reprofile part of the Country Park cannot sensibly be considered as an isolated change. I ask the Committee to consider the need for a clear, consolidated account of the original approved scheme, the alterations already made and those now proposed, including their cumulative effects, before supporting any further variation.

I encourage the Committee to scrutinise these proposals robustly and to recognise that, although local councillors have been actively engaged and supportive throughout, their intervention cannot substitute for effective planning oversight, transparent decision-making and accountability for the consequences of this or other planned development.

Kind regards,

Doug Male