



Holybourne Village Association's Planning Application Response

JULY 2025

Application Reference: EHDC-25-0748-OUT

Development Proposal: Outline Planning Application for 160 dwellings. All matters reserved except access.

This statement has been prepared by Holybourne Village Association in response to planning application EHDC-25-0748-OUT.

Holybourne Village Association (HVA) objects to the planning application in the strongest of terms.

This statement should be read in conjunction with the supplementary notes which provide elaboration on the various objections; together with the appended appeal decisions which further corroborate HVA's position.

The application should be refused for the following reasons:

1. Impact upon Cuckoo's Corner Roman Settlement Scheduled Monument - See Supplementary Note A for Elaboration

- The Roman settlement at Cuckoo's Corner is a Scheduled Monument of national importance of the highest order.
- Notwithstanding the risk to underground archaeology at the site, the relocation of a play area and kick about area onto the Scheduled Monument risks trivialising and damaging a nationally significant heritage asset - an act that prioritises convenience over cultural responsibility. The monument's integrity must be respected - not compromised by modern infrastructure.
- The development would also severely impact the setting of the Scheduled Monument – a setting that plays an important role in helping to understand why the Roman settlement was located in this location.
- For the above reasons, the development would result in substantial harm to the significance of the Scheduled Monument. In this context, wholly exceptional justification of the harm, as is required under paragraph 213 of the NPPF, has not been demonstrated.
- The application should be refused under JCS Policy CP30 and NPPF paragraph 11d(i) and the tilted balance under NPPF paragraph 11d(ii) need not be engaged.
- The appended Torrisholme Bowl Barrow appeal decision provides a clear example of the weight that the NPPF attributes to the protection of nationally important Scheduled Monuments and their settings.



2. Impact Upon Other Heritage Assets – See Supplementary Note B for Elaboration

- Policy CP30 of the Joint Core Strategy (JCS) is unequivocal in that all “development proposals must conserve and, where possible, enhance the district’s historic environment”. The development fails in this regard.
- The proposed urbanisation of the rural settings of the Grade II* listed Church of the Holy Rood (a nationally important heritage asset of the highest significance) and the Grade II listed Manor Farm House would substantially harm the significance of the heritage assets. The substantial harm has not been justified as wholly exceptional or exceptional (respectively), nor have the public interest tests been met, in line with the NPPF approach to heritage.
- The proposed urbanisation of the application site would also lead to substantial harm to the setting of Holybourne Village Conservation Area and to harm to the setting of the Grade II listed buildings of Holybourne House, Oak Cottage and The Forge.
- Further harm would result to the character and appearance of the conservation area with respect to the proposed scheme of highways works and also the increases in traffic through the village, both during and post construction.
- The public benefits of the development do not justify or outweigh the harm.
- The NPPF policies relating to heritage assets are engaged under NPPF Paragraph 11d(i) and provide clear and strong reasons for refusing the planning application.

3. Loss of Holybourne Play Area; a Designated Local Green Space – See Supplementary Note C for Elaboration

- The development, by reason of the loss of Holybourne Play Area (a designated Local Green Space), would result in the loss of an extremely well-used and highly valued social and recreational facility at the heart of the village. The outstanding countryside views from Holybourne Play Area help connect the village to its rural landscape setting and are a particularly important aspect of the Local Green Space designation.
- The NPPF sets out that Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period. The NPPF is explicit in that once designated, boundaries of designated Local Green Spaces should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans – not through speculative planning applications.
- The proposed replacement represents a significant diminishment in quality and community value. It will be enclosed by, and intrinsically linked to, the residents



of the newly created neighbourhood; rather than serving as a notable facility for the wider village with outstanding countryside views.

- Where the development fails to protect an asset afforded particular importance in the NPPF there is strong reason to refuse the application. NPPF Policy 11d(i), JCS Policies CP1, CP16 and CP17 and Alton Neighbourhood Plan Policy CH5 all direct refusal of the application.

4. Flood Risk and Drainage – Failure to Undertake a Sequential Test - See Supplementary Note D for Elaboration

- JCS Policy CP25 and NPPF Paragraph 173 sets out that a sequential risk-based approach should be taken to individual applications in areas known to be at risk now or in future from any form of flooding.
- EHDC's Level 1 Strategic Flood Risk Assessment mapping shows that the application site falls within an area of potential groundwater flooding. Policy CP25 also explicitly identifies the risk of ground water flooding in this location and directs that development should be avoided. This flood risk is further corroborated by the application submissions and by the local evidence presented.
- The risk of flooding has not been adequately justified through identifying that there are no sequentially preferable sites in a logical and robustly identified Sequential Test Area. The proposal would therefore be contrary to both JCS Policy CP25 and the Framework, which both aim to sequentially direct development away from areas at risk of flooding to avoid flood risk to people and property.
- As the sequential test has not been undertaken, the exception test (i.e. whether the site could be made safe for its lifetime) in Paragraph 177 of the Framework is not relevant at this stage.
- The applicant has not completed a sequential test and therefore JCS Policy CP25 and the policies of the NPPF provide a clear reason for refusal. This alone is a matter of sufficient force to outweigh the benefits of the proposal given the strictness with which flooding is addressed in national policy – see Fairlight Cove and Lancaster appeal decisions for case law.
- In the circumstances NPPF Paragraph 11d(i) directs refusal of the application. The tilted balance under paragraph 11d(ii) of the NPPF need not be engaged.



5. Size and Scale of the Development and Impact on the Character of the Village and the Existing Community – See Supplementary Note E for Elaboration

- Disproportionate Scale & Location - The development, by virtue of its size and position outside the settlement boundary, would cause a significant and demonstrable adverse impact on the village's character, identity, and social cohesion.
- Conflict with Spatial Strategy & Settlement Hierarchy - Holybourne is classified as an "other settlement with a policy boundary," intended for only small-scale local development. The proposal for 160 dwellings far exceeds what is proportionate for a village of its scale and service availability.
- Policy Noncompliance – Joint Core Strategy (JCS) - The development undermines the established settlement hierarchy, ignoring the guiding spatial vision and strategic distribution principles that form the golden thread of the JCS.
- Planning Principles – Right Place, Right Scale - Local and national policies emphasise that new housing must be appropriately located and scaled - regardless of housing land supply pressures. It is not a case of development at any cost.
- Tibberton Appeal Precedent - The Tibberton appeal illustrates how a similarly scaled proposal in a small village was rightly refused due to irreversible harm to local character, poor infrastructure alignment, and conflict with planning strategy - despite housing need.

6. Landscape Character and Visual Impact – See Supplementary Note F for Elaboration

- The site lies outside Holybourne's settlement boundary, forming part of the open countryside and contributing to the village's rural setting.
- By introducing incongruous built form into an open and undeveloped area that positively contributes to local landscape character, the proposal would cause significant harm to the character and appearance of the area. It disregards the established scale and identity of Holybourne, failing to respond to the village's capacity for growth and undermining its local distinctiveness.
- The site lies within Local Area 4b.1 (Alton to Bentley North of A31) of EHDC's Landscape Capacity Study (2018). This is a regionally important landscape, with low capacity for change due to its rural character, historic assets, and visual sensitivity.
- The landscape holds high value due to the outstanding countryside views and active community use of the Play Area and footpaths.



- At 160 dwellings, the proposed development significantly exceeds the small scale local development that is anticipated in Holybourne under JCS Policy CP10;
- At 160 dwellings, the proposed development significantly exceeds the small scale development which the EHDC's Landscape Capacity Study identifies could potentially be provided without causing significant and detrimental damage to the regionally important Landscape Character Area;
- The harm identified against the development is substantial and not outweighed by the public benefit of the proposals.
- The Southminster Appeal Decision is directly comparable to the development proposals and reinforces the principle that the resulting landscape harm should be concluded to outweigh public benefit.

7. Failure to Support EHDC's Sustainable Transport Objectives – See Supplementary Note G for Elaboration

- With Holybourne being identified as an “other settlement with a policy boundary”, the additional 160 homes proposed would take the level of growth outside what could be considered ‘small scale local development’ in the context of Holybourne's position within the settlement hierarchy (tier 4), the size of the village and the availability of services.
- Whilst Holybourne does contain some local infrastructure, the vast majority of trips from the development would be external to the village by private car.
- Neither has the applicant made any meaningful assessment of whether the existing services in the village can support an additional 160 homes, representing a 30% increase in the size of the village.
- The development therefore does not support EHDC's sustainable transport objectives in accordance with the overriding principles of sustainable development established via EHDC's application of the settlement hierarchy.
- The application should therefore be refused in accordance with JCS Policies CP1, CP2 and CP10 and NPPF Paragraph 110.

8. Highways Impact – See Supplementary Note H for Elaboration

- The vast majority of trips from the development would be external to the village by private car. In generating considerable growth in external trips, the development would result in a large number of additional journeys through the village and on a poor rural road network with seriously negative consequences for highway safety, congestion, inconvenience and environmental harm.



- The traffic modelling presented in support of the application appears to underestimate the likely impact of the development. An independent and locally calibrated transport assessment should be commissioned, including sensitivity testing and validation against observed conditions.
- The proposed access, given the proximity to Pentons Close, creates a conflict zone, increasing the risk of turning collisions and driver hesitation. This is exacerbated given that vehicles parked along London Road will obstruct forward visibility, making it harder for drivers to see oncoming traffic or pedestrians. The proximity to recreational facilities means frequent pedestrian movement, including children, which heightens the need for clear sightlines and safe crossing points.
- The development would result in an unacceptable impact on highway safety within the wider village and the residual cumulative impacts on the road network would be severe. Whilst mitigation measures are identified, they do not address the key issues and in any event are disproportionate and insensitive to the village's character and conservation status.
- HVA has severe concerns regarding the construction traffic. The application submissions however fail to acknowledge, assess or address the significant impact of construction traffic on the village's constrained road network. This omission is unacceptable and undermines the credibility of the transport assessment.

9. Impacts upon existing Village Infrastructure – See Supplementary Note I for Elaboration

- Holybourne is a rural Level 4 settlement with a limited but vital range of local services. A 160-dwelling proposal represents a 30% increase in village size — well beyond what is considered “small-scale local development” (JCS para 4.9). No Infrastructure Capacity Assessment has been submitted to demonstrate if/how key community facilities could/would support the population increase.
- For example, whilst Andrews Endowed Primary School does have some capacity, it could not accommodate the numbers that would be expected from such a large scale housing estate. Children from the development therefore would be forced to travel outside the village - contrary to sustainable development principles.
- Thames Water data confirms 375 hours of sewage discharge into the River Wey in the past 3 years due to system failure during heavy rain. Existing infrastructure is overburdened; no upgrades have been confirmed or funded. Approval should be withheld until written assurances are provided that upgrades will be delivered



and financed. If appropriate, a Grampian condition could regulate infrastructure delivery timing — subject to full evidence and binding commitments.

- Holybourne's infrastructure cannot accommodate the scale of development proposed. In the absence of detailed capacity evidence and mitigation measures, the scheme would conflict with both local and national planning policies aimed at promoting sustainable, well-supported communities.
- The development should be refused until robust infrastructure solutions are clearly demonstrated.

10. Loss of Best and Most Versatile (BMV) Agricultural Land

- The development would result in the loss of BMV Agricultural Land to which the NPPF attributes economic and other benefits (NPPF paragraph 187). This aspect weighs further against the development.



Statutory Development Plan

The Statutory Development Plan covers the period 2011 to 2028 and comprises:

- The East Hampshire District Local Plan: Joint Core Strategy (JCS) (2014); and
- The Alton Neighbourhood Development Plan (ANP) (as modified April 2021).

The utilisation of the settlement hierarchy to achieve a sustainable pattern of development is the golden thread of the JCS that is set out explicitly in policies CP1 (Presumption in Favour of Sustainable Development) and CP2 (Spatial Strategy); before flowing on to hold together and give value to the remainder of the JCS Policies.

Policy CP10 of the JCS provides the spatial strategy for new housing. It allows for development within settlement policy boundaries where development maintains and enhances character and quality of life.

The settlement hierarchy identifies Holybourne as an “Other Settlement with a settlement policy boundary” outside of the South Down National Park. Policy CP10 allocates a minimum of **150 dwellings to be shared between** Grayshott, Arford, Beech, Bentley, Bentley Station, Bentworth, Bramshott, Griggs Green, Headley, Headley Down, Holt Pound, **Holybourne**, Kingsley, Lindford, Medstead village, Passfield Common, Ropley, Ropley Dean, Upper Froyle, Catherington, Lovedean and other “small rural villages/hamlets within the countryside”.

Moreover, Holybourne is a rural village distinct and separate from Alton, the latter identified as a Market Town at the top end of the Settlement Hierarchy. Whilst in close proximity, the importance of maintaining Holybourne's separate character and identity is explicitly acknowledged within the development plan by way of Policies CP1 (Presumption in Favour of Sustainable Development), CP2 (Spatial Strategy), CP10 (Spatial Strategy for New Housing) and CP23 (the Alton/Holybourne Strategic Gap).

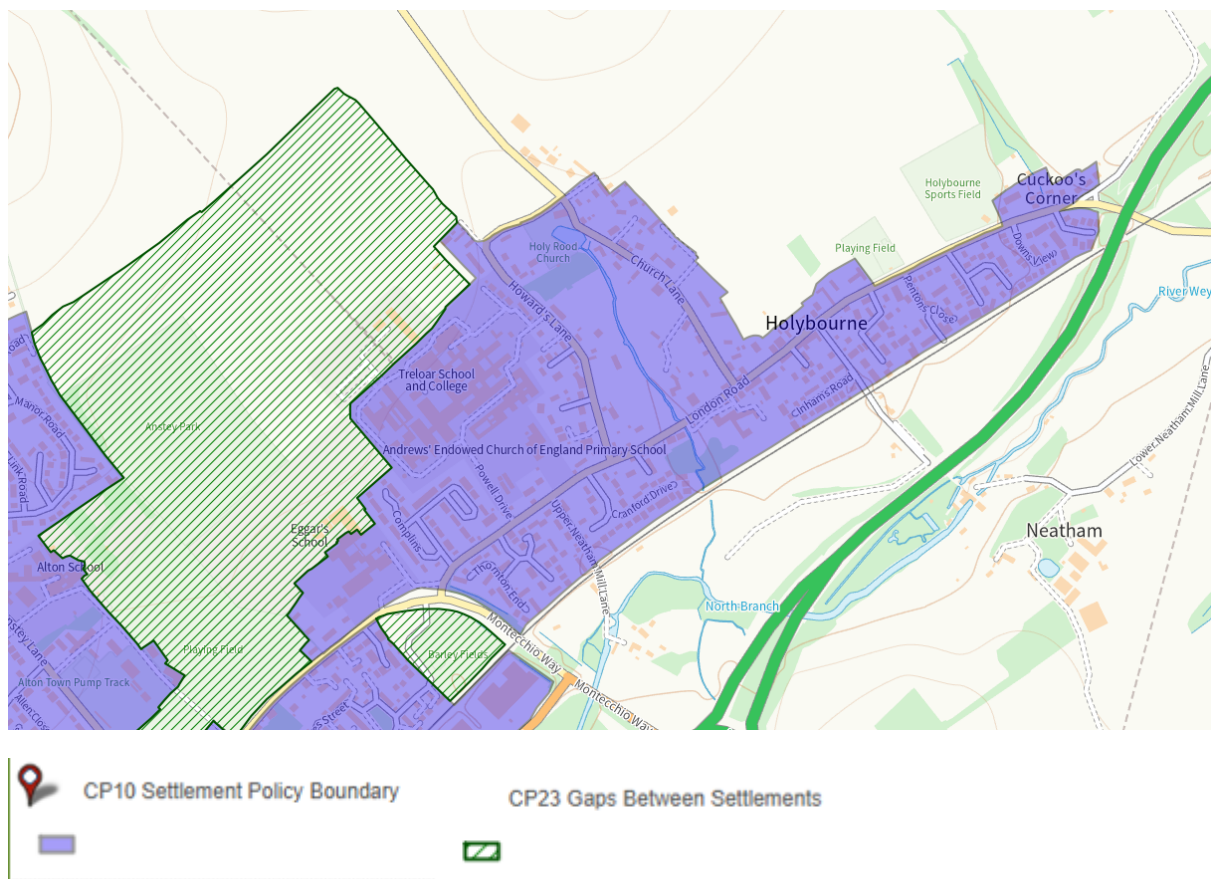
In March 2023 the Council adopted the Housing Outside Settlement Boundaries SPD; which provides an elaboration of saved policies including CP10 on the existing spatial strategy for growth. It sets out that development outside of settlement boundaries will depend upon a community need, reinforcement of settlement role and function, inability to accommodate within the settlement and having local support. It however made no changes to the specific housing numbers identified in Policy CP10 for any of the settlements.

The Alton Neighbourhood Plan sets out a range of non-strategic policies which are intended to guide planning decisions made by the local planning authority in respect of Alton and Holybourne. There are no policies within the Alton Neighbourhood Plan that



would support development upon the application site. To the contrary, Policy CH5 of the Neighbourhood Plan explicitly designates Holybourne Park as a Local Green Space where development will not be permitted other than in “very special circumstances”.

Figure 1: The Holybourne Settlement Boundary (Source: EHDC Mapping system)



The Emerging Local Plan and Emerging Alton Neighbourhood Plan

Both the Local Plan and the Alton Neighbourhood Plan are currently being reviewed. The emerging plans can be afforded very limited weight at this early stage of review.

EHDC Five Year Housing Land Supply

Local planning authorities are required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirements. In December 2024 the Government changed the formula for calculating housing numbers. As result of that change, East Hampshire District Council (not including South Downs National Park) can currently only demonstrate 2.7 years of housing land supply; equivalent to a 2,036-dwelling shortfall.



National Planning Policy Framework 2024 (NPPF)

Where EHDC cannot demonstrate a five year supply of deliverable housing sites the policies of the JCS relating to housing supply are deemed out of date. In those circumstances, NPPF Paragraph 11d) directs decision makers to grant permission unless:

- (i) the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

NPPF Paragraph 11d(i) - Protection of areas or assets of particular importance

The NPPF footnote to paragraph 11 advises that in respect to 11d(i), the policies referred to are those in the Framework (rather than those in development plans) relating to:

- habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest;
- land designated as Green Belt, **Local Green Space**, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast;
- irreplaceable habitats;
- **designated heritage assets**; and
- **areas at risk of flooding** or coastal change.

As is demonstrably and extensively set out in Supplementary Notes A-D, the development would result in:

1. Substantial harm to the heritage significance of a Scheduled Monument of National Importance;
2. Substantial harm to the historical significance of the Church of the Holy Rood (Grade II* listed), Manor Farm (Grade II listed) and to the Holybourne Conservation Area;
3. Harm to the setting/significance of several other grade II listed buildings;
4. The loss of a well-used and highly valued designated Local Green Space; and
5. A risk of flooding which, given the absence of a sequential test covering a logical and robustly identified Sequential Test Area, has not been adequately justified.



Under NPPF paragraph 11d(i) each of these aspects individually provide good reason to refuse the application, given the strictness with which the matters are addressed in national policy. As such, the tilted balance under paragraph 11d(ii) need not be engaged. When considered cumulatively, it is difficult to see how a decision maker acting reasonably could conclude other than against the development. **As there is clear reason(s) for doing so, the provisions of NPPF paragraph 11d(i) direct refusal of the application.**

With regards to the NPPF 11d(i) matters, attention is drawn to the following appeal decisions (referred to in more detail and appended to the relevant Supplementary Notes):

- APP/A2335/W/23/3326750 – Morecambe, Lancashire – Scheme dismissed due to impact on setting of the Torrisholme Barrow Scheduled Monument
- APP/D3125/W/23/3332089 – Ascott under Wychwood, Oxfordshire – Scheme dismissed due to heritage and landscape impacts.
- APP/U1430/W/21/3283287 – Fairlight Cove, East Sussex – Scheme dismissed due to risk of ground water flooding which was not justified through a Sequential test.
- APP/A2335/W/24/3345416 - Bailragg Lane, Lancaster – Scheme dismissed due to risk of fluvial, surface and ground water flooding which was not justified through a Sequential test.

In each of those appeals, like EHDC, the Local Authorities could not demonstrate 5 year land supplies such that the Paragraph 11d presumption in favour of sustainable development was invoked. However, in all instances the appeals were dismissed. Moreover, the appeal decisions illustrate unequivocally the weight in decision making to be attributed to conflicts with the policies listed under NPPF Paragraph 11d(i). These appeal decisions are directly relevant and comparable to the proposed development in Holybourne and reinforce the position that this application should be refused.

NPPF Paragraph 11d(ii) – The ‘Tilted’ balance... need not be engaged

As set out above, the development proposals are already in conflict with NPPF policies that seek to protect areas or assets of particular importance such that there are strong reasons to refuse the application. The tilted balance therefore need not be engaged under paragraph 11d(ii). It is necessary only to apply the normal balance.

Having regard to this normal balance, there would be further significant and demonstrably harmful impacts of the development that should be given due regard in the decision making process. These are set out above in reasons 5-10.



With regards to these additional objections, attention is drawn to the following appeal decisions:

- APP/H1840/W/23/3320041 – Tibberton, Wychavon District Council – Scheme dismissed due to irreversible harm to local character, poor infrastructure alignment, and conflict with planning strategy - despite housing need.
- APP/X1545/W/24/3351697 – Southminster, Maldon District Council - Despite significant public benefits, the landscape harm was so substantial that it outweighed the benefits.

Like the other appeals listed above with respect to the Paragraph 11d(i) matters, these appeal decisions too are directly relevant and comparable to the proposed development in Holybourne. Importantly however, they evidence that non-para 11d(i) matters too can represent sufficient harm to warrant refusing the application in their own right. These appeal decisions provide further case law to justify why, having regard to national planning policy, the application should be refused.

Planning Balance

HVA acknowledges that in light of the NPPF guidance, the decision maker will need to accept that the delivery of market and affordable housing in the context of a district without a five-year housing supply is a public benefit of high order. It is also acknowledged that there will be some associated economic benefits in terms of job creation during construction and local spending, and some modest benefits from biodiversity net gain.

However, they are all benefits as were similarly presented to and accepted by the Inspectors of the various example appeal decisions that the HVA have included with the submissions. Despite the benefits, the Inspectors all went on to dismiss the appeals.

Quite simply, the public benefits of the proposed development would not outweigh the totality of the harm identified. That harm includes:

- Substantial harm to the heritage significance of a Scheduled Monument of National Importance;
- Substantial harm to the heritage significance of the Church of the Holy Rood (Grade II* listed), Manor Farm (Grade II listed) and to Holybourne Conservation Area;
- Harm to the setting of several other grade II listed buildings;
- The loss of a well-used and highly valued designated Local Green Space;
- A risk of flooding which, given the absence of a sequential test covering a logical and robustly identified Sequential Test Area, has not been adequately justified;



- Significant and demonstrable harm to the character and identify this rural village, to the considerable detriment of the social wellbeing of the existing village community;
- Substantial harm to the landscape character and appearance of the area which forms part of a regionally important Landscape Character Area;
- Failure to support EHDC's sustainable travel objectives for the district;
- Transport impacts;
- Impacts upon Community infrastructure; and
- A loss of BMV Agricultural Land.

The development would demonstrably harm the objectives set out in the Framework. In particular the NPPF attributes great weight to the need to conserve heritage assets and Local Green Spaces in an appropriate manner, and the need to direct development away from areas at risk of flooding. In these regards the exceptional circumstances cases and the public interest tests of the Framework are not met.

The Framework also identifies that the planning system should actively manage patterns of growth in support of sustainable transport objectives (NPPF Paragraph 110). EHDC's method for actively managing growth in accordance with the Framework requirement is via its adopted settlement hierarchy. The urban expansion proposed is manifestly outside what could be considered 'small scale' in the context of Holybourne's position within the settlement hierarchy, the size of the village and the availability of services.

At paragraph 129 the Framework sets out that whilst decisions should support development, this is provided the land is suitable for accommodating it and decisions should take into account the desirability of maintaining an area's prevailing character and setting. At paragraph 135 the framework goes on to state that developments should be sympathetic to local character and history, including the surrounding built environment and landscape setting. Neither of these policy tests are met.

Notwithstanding the housing land supply position, under the development plan and the Framework there remains a need to ensure that housing development is permitted in the right place and of the right scale for that location. It should not be a case of development at all costs. The appended appeal decisions corroborate this approach to resisting inappropriate development where there is strong reason for doing so.

The JCS and the National Planning Policy Framework provide clear reasons for refusing the planning application and there are no material considerations of sufficient weight to dictate that the decision should be taken otherwise.