



Response Note: Developer Contributions and Settlement Hierarchy Concerns

Subject: Planning Application EHDC/25/0748/OUT – Developer Contributions Team Comments

We note the consultation response from EHDC's Developer Contributions Team, which outlines potential S106 obligations and references a range of infrastructure projects located in Alton. While we support the principle of securing appropriate mitigation for development impacts, we are concerned that the response fundamentally misrepresents the planning context of Holybourne.

1. Misapplication of the Adopted Settlement Hierarchy

Holybourne is identified in the adopted Joint Core Strategy (2014) as a Tier 4 settlement - a rural village with a limited range of services, suitable only for small-scale local development. The consultation response, however, treats Holybourne as if it were a suburb of Alton (Tier 1), by proposing mitigation measures that are:

- Located entirely within Alton;
- Designed to support growth in Alton's population and infrastructure;
- Unrelated to the scale or character of development appropriate for a Tier 4 village.

This approach undermines the adopted spatial strategy and settlement hierarchy, which remains the statutory basis for decision-making.

2. Draft Reg 18 Plan Carries No Weight

We are aware that the Regulation 18 draft Local Plan (2024) proposed elevating Holybourne to Tier 1 status. However:

- This draft plan has not been examined;
- It has no formal status in the decision-making process;
- It fails to account for infrastructure capacity, environmental constraints, or settlement size, unlike previous hierarchies.

Until such time as a new Local Plan is adopted following public examination, the 2014 JCS remains the operative plan, and Holybourne must be treated accordingly.

3. Inappropriate Mitigation Measures

The S106 proposals listed - such as contributions to Alton's 3G pitch, hockey facilities, skate park, and golf club - are not proportionate or relevant to a development in a rural



village context. These are Alton-scale mitigations, not those appropriate for a small, freestanding community like Holybourne.

This reinforces the concern that, despite the Reg 18 plan not having progressed beyond the consultation stage, EHDC is already fundamentally disregarding its own adopted policy framework and now functionally merging Holybourne with Alton. By proposing mitigation measures designed for a Tier 1 market town, rather than a Tier 4 rural village, the Council is effectively treating Holybourne as a suburb of Alton - contrary to the Joint Core Strategy (2014), which remains the statutory development plan. This approach not only misrepresents Holybourne's planning status but also risks undermining the integrity of the settlement hierarchy and the principles of sustainable, proportionate growth.

Conclusion

We urge EHDC to ensure that all consultation responses and planning assessments are grounded in the adopted development plan. Holybourne must be treated as a distinct Tier 4 settlement, and any development and developer contributions should reflect the scale, character, and capacity of the village - not those of a neighbouring market town.