

**From:** chairman@holybourne.com <chairman@holybourne.com>

**Sent:** 11 November 2025 14:28

**To:** info-requests@easthants.gov.uk <info-requests@easthants.gov.uk>

**Subject:** FOI Request - Outline Planning Application EHDC/25/0748/OUT (Holybourne)

Dear EHDC,

Under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004, I am writing on behalf of Holybourne Village Association (HVA) to formally request the below information in relation to planning application EHDC/25/0748/OUT (Land North of London Road, Holybourne).

It is important to note that Redbrown is not a local housebuilder but part of a wider group of companies engaged in strategic land acquisition and promotion at a national level. This business model is primarily focused on purchasing rural estates and thereafter actively promoting alternative non-rural land uses to increase land value, rather than delivering community-led development. Their approach prioritises asset value uplift and investor returns, which can conflict with local character and community-led planning principles. This context underscores the need for EHDC to ensure transparency and robust public engagement – especially, considering EHDC's commitments under its own Council Strategy (2024-2028), to:

- Put communities first and empower residents to shape their places.
  - Develop thriving communities by increasing participation and trust in local decision-making.

We will await the full response to this FOI request before deciding on any further action. Depending on the nature and completeness of the information disclosed, we reserve the right to escalate the matter to the Information Commissioner's Office, the Local Government Ombudsman, or to raise public awareness through local and national media channels. We will also be submitting parallel FOI requests to Hampshire County Council and Historic England and expect all responses to be received for our review prior to any determination of planning application EHDC/25/0748/OUT.

**Further Consultation Confirmations**

HVA notes that additional documents with respect to drainage and highways works have recently been submitted by the applicant and uploaded to the planning portal, and that the consultation end date for the application has been extended to 21/11/2025. HVA is also aware that the local community has not been formally notified of these new documents or of the extension to the consultation period.

Please confirm and provide supporting documentation for the following:

1. Who EHDC has consulted regarding the newly uploaded documents that prompted the extension of the consultation period.

1. Why EHDC considers it unnecessary to re-consult the local community on these documents.

HVA has also received correspondence from Redbrown stating that they have been liaising with the Council and statutory consultees to resolve objections and are preparing amendments for submission. They indicate that a formal re-consultation by EHDC will follow the submission of the documents. Please confirm:

3. Whether, to EHDC's knowledge, this statement is accurate.
4. If so, whether EHDC is satisfied that Redbrown's forthcoming documents will address all outstanding issues raised in previous submissions.
5. Whether EHDC has concluded its discussions and negotiations with Redbrown, or if further exchanges are anticipated beyond the date of this request.
6. When EHDC expects to receive the revised submissions.
7. Whether EHDC intends to undertake a full re-consultation on the planning application once the updated documents have been received, including notifying all residents who previously submitted comments.

### **Correspondence and Engagement During Determination since application submission - External**

Redbrown's recent correspondence indicates that EHDC Officers have continued to engage with the applicant following submission of the planning application. Please therefore provide:

8. **Copies of all correspondence dated after 2nd July 2025** relating to the development and planning application, including (but not limited to) emails, meeting notes, letters, internal memos, and any virtual meeting records, between EHDC and:

- Hampshire County Council (HCC);
- Historic England;
- The applicant (Redbrown Ltd) or their agents.

9. **Confirmation and supporting documentation** of whether EHDC Officers have specifically requested that these consultees engage with and respond to the community evidence submitted - particularly that submitted by HVA and the appeal precedents referenced in our submissions.

### **Internal EHDC Correspondence and Engagement During the Determination of the Planning Application since the application was submitted - Internal**

Please also provide the following:

10. **Copies of all correspondence dated after 2nd July 2025** relating to the development and planning application, including (but not limited to) emails, meeting notes, letters, internal memos, and any virtual meeting records, between EHDC Officers with regards to the application.

11. **Confirmation and supporting documentation** of whether the EHDC consultees are being specifically asked to review and respond to the community evidence that has been submitted – particularly that submitted by HVA and the numerous appeal precedents that have been identified.

### **Public Comments and Advocacy Platforms**

HVA notes that several support comments have been recently added to the planning portal, which appear to follow a generic format and are consistent with those generated via the “Just Build Homes” platform - a developer funded advocacy service that facilitates public support for housing schemes through templated submissions. Indeed, the blue text underlying EHDC’s redaction in one of the letters is still faintly visible and clearly reads “Just Build Homes”, therefore confirming the origin of the submission.

Just Build Homes states on its website that it works in partnership with developers, housing associations, and local planning authorities. Given this, and the fact that EHDC

have demonstrably (but unsuccessfully) tried to redact the source of the emails, please could you confirm and/or provide the following:

12. Whether EHDC has engaged Just Build Homes in any capacity to promote or support this planning application?
13. Whether EHDC has engaged Just Build Homes in any capacity to promote or support any other application within the East Hampshire district?
14. In the event that EHDC has engaged Just Build Homes in any capacity, please provide copies of any communications between EHDC and Just Build Homes.
15. In the event that EHDC has not engaged Just Build Homes, please confirm whether EHDC will: 1) seek confirmation from Redbrown of whether they have engaged Just Build Homes to generate the support letters; and 2) require full disclosure of such (one way or the other) in an update to Redbrown's Statement of Community Involvement (SCI).

The SCI is after all intended to provide a transparent account of all community engagement activities, and the use of paid advocacy services is a material consideration in understanding the nature and source of public feedback.

## **Drainage and Flood Risk**

Please provide:

16. All correspondence with the Lead Local Flood Authority (LLFA) regarding the revised Flood Risk Assessment and Drainage Strategy submitted in October 2025.
17. Confirmation of whether anyone from EHDC (and who) was present at the meeting referred to at appendix L of the revised Flood Risk Assessment and Drainage Strategy - including EHDC's Drainage Officer – and, if so, whether the meeting note is an accurate reflection of the meeting.
18. If EHDC were present at the meeting, then please confirm the specific policy grounds upon which it was concluded that a Sequential Test is not required for this site.
19. Confirmation of whether the EHDC Drainage Officer has been asked to review and respond to the community evidence submitted – particularly that submitted by the HVA and the appeal precedents.

20. Confirmation of whether EHDC has asked HCC LLFA to review and respond to the community evidence that has been submitted – particularly that submitted by HVA.

### **Revised Scheme of Highways Works**

Please provide the following:

21. Confirmation and supporting documentation of who from EHDC, if anyone, attended or participated in the highways workshop held on 6th October 2025, as referenced in the Paul Basham Associates letter dated 29th October (submitted by the applicant and posted on the planning portal).
22. Clarification and supporting documentation on whether EHDC considers that, given the scale and nature of the proposed highways works and the significant changes they would introduce to the village if approved, such a scheme should be subject to full community engagement and consultation. This should include community workshops to allow residents to understand the proposals and provide informed feedback, rather than being introduced as additional documents without formal re-consultation. Please confirm whether EHDC intends to require such engagement and whether the current description of development will be amended to reflect these works.

### **Landscape Officer Response**

HVA notes that the consultation response from EHDC's Landscape Officer has not been posted on the planning portal. Please provide:

23. Confirmation of whether a consultation response has been received from EHDC's Landscape Officer.
24. A copy of the consultation response, if it exists.
25. An explanation of why this response has not been published on the planning portal, if it has been received.

### **Policy Officer Comments**

HVA has previously raised significant concerns regarding the consultation response submitted by EHDC's Policy Officer. Please provide:

26. Confirmation and supporting documentation of whether the EHDC Policy Officer has been asked to review and respond to the concerns raised by HVA in relation to their original consultation response.

27. Clarification and supporting documentation on whether, in light of the issues raised by HVA, the Policy Officer intends to review and update their submission to ensure it accurately reflects current local and national planning policies.

### **Conservation Officer Comments**

Please provide:

28. An explanation and supporting documentation of the basis upon which EHDC's Conservation Officer changed their position from identifying "substantial harm" and the need for an Environmental Impact Assessment in May 2025 (screening opinion) to "less than substantial harm" by September (planning application response).

29. Confirmation and supporting documentation of whether the Conservation Officer has visited the site or relied solely on submitted documents.

30. Confirmation of whether the Conservation Officer intends to undertake a further site visit now that foliage has fallen, to properly assess how the church is experienced within the rural landscape, including views from the London Road end of the site.

31. Confirmation and supporting documentation of whether the Conservation Officer has been asked to engage with and respond to local evidence submitted, including the appeal precedents provided by HVA.

32. Confirmation of whether the Conservation Officer has been asked to assess the impact of discharging all spring water unattenuated into the curtilage of a listed building.

33. Confirmation of whether the Conservation Officer has been asked to consider the impact of the proposed highways scheme on the historic character of the village and the Conservation Area.

### **Decision Making Process**

Please provide:

34. Copies of any internal timelines, committee schedules, or decision-making frameworks relating to planning application EHDC/25/0748/OUT.

35. Confirmation and supporting documentation of whether EHDC intends to determine the application before FOI responses from HCC, Historic England, and EHDC itself have been received and reviewed.

We respectfully request that this information be provided prior to any determination of the application. Parallel FOI requests have been submitted to HCC and Historic England, and we expect full disclosure in accordance with statutory timelines.

Please confirm receipt of this request and advise of the expected response date.

Yours sincerely,

Robert Law

Chair  
Holybourne Village Association