



Subject: HVA Follow-Up HCC Highways' Consultation Response – Planning Application EHDC/25/0748/OUT

We write in response to Hampshire County Council's (HCC) highways consultation on planning application EHDC/25/0748/OUT for 160 dwellings in Holybourne. While we acknowledge HCC's engagement with technical matters, we have serious concerns about the assumptions, omissions, and tone of the response. These concerns relate not only to highway safety and infrastructure capacity, but also to the broader implications for Holybourne's identity as a free-standing Tier 4 village.

1. Village Identity and Character

HCC's response repeatedly frames Holybourne as a suburb of Alton, rather than recognising its distinct status within the settlement hierarchy. This mischaracterisation leads to a skewed assessment of sustainability, where proximity to Alton's infrastructure is used to justify development, rather than evaluating Holybourne's own capacity, character, and constraints. The Joint Core Strategy and Alton Neighbourhood Plan both affirm Holybourne's separate identity, and this must be respected in any infrastructure or transport assessment.

2. Access Arrangements and Safety

The proposed access point to the site is located near a new play area and relies on a staggered junction with Pentons Close, with only 31m separation - below the 45m minimum required under HCC TG2 for a 30mph road. This is a location where departures from standards should not be supported, given the high pedestrian activity and proximity to community facilities. Access is the only detailed matter being considered, and it is highly concerning that HCC suggests a departure from standard could be pursued at the s278 stage.

Visibility splays rely on the removal of a tree and the imposition of double yellow lines, which would displace existing parking used by residents and visitors. Not only would the combination of a Copenhagen-style crossing and yellow lines act to urbanise this part of the village, but Pentons Close is unadopted such that neither HCC nor the applicant has legal authority to implement traffic regulation measures within it. Measures relying on unadopted land are unenforceable and undermine the safety justification for the proposed access.

3. Suburbanisation and Visual Harm

The proposed highway interventions - including buildouts, pinch points, formalised parking bays, excessive signage, road lining, and a Copenhagen-style crossing - are engineered suburban features that conflict with the rural and historic character of Holybourne. The village centre is a designated Conservation Area, and these interventions risk irreversible harm to its identity.



Specifically, the Copenhagen-style crossing, while promoting pedestrian priority, introduces a distinctly urban design language that detracts from the traditional, rural aesthetic of the village. Such features are not present elsewhere in Holybourne and would appear incongruous in this context. The cumulative effect of the engineered interventions is to urbanise the village, undermining its distinctiveness and heritage value.

4. Infrastructure Capacity – A Critical Omission

HCC, like the applicant, lists infrastructure assets without assessing their capacity to absorb growth. This is misleading and contrary to the principles of sustainable development. Key deficits include:

- Primary Education: Andrews Endowed Primary School cannot accommodate the projected pupil yield.
- Early Years Provision: HCC's own consultation confirms a shortfall of 24 places.
- Healthcare: GP services are at capacity.
- Sewage Infrastructure: Thames Water data shows repeated discharge events.
- Community Facilities: No assessment of whether the village hall can accommodate a 30% increase in population.

Listing infrastructure without assessing its ability to support growth risks misleading decision-makers and undermines the credibility of the transport assessment.

5. Lack of Community Engagement

We are deeply concerned that HCC is negotiating a highway strategy with the applicant without any engagement with the community. The proposed interventions will materially alter the character of the village and affect residents, yet there has been no consultation on their design, impact, or enforceability. Measures such as traffic calming and parking restrictions must be community-supported and context-sensitive.

National guidance from Active Travel England (2025) and the Department for Transport clearly states that community consultation and engagement are essential components of transport scheme development, particularly where changes to road layouts or traffic regulation orders (TROs) are proposed. Authorities are expected to follow a step-by-step process that includes early engagement, stakeholder mapping, inclusive consultation, and transparent decision-making. The guidance emphasises that engagement should not be limited to statutory consultation, but should actively involve local communities throughout the design and delivery stages to ensure that schemes are context-sensitive, locally supported, and reflective of community needs. This is especially important in rural and conservation areas, where the character and function of the place are integral to its identity. Failure to engage meaningfully risks undermining public trust, generating opposition, and delivering infrastructure that is poorly aligned with local priorities.



6. Lessons from Lenten Street, Alton – A Documented Failure of Traffic Calming

Attention is drawn to the case of Lenten Street in Alton, where traffic calming buildouts were installed by Hampshire County Council and Alton Town Council with the intention of reducing vehicle speeds and improving safety. Despite being considered a well-intentioned intervention at the time, the scheme quickly proved to be a failure. Residents reported frequent vehicle damage, confusion among drivers, and increased safety risks. The buildouts were removed within a year following widespread public opposition and recognition that the measures were not fit for purpose.

This is a clear warning that engineered suburban interventions are not guaranteed to deliver the intended outcomes and instead risk introducing new problems, particularly in areas with constrained carriageways, high pedestrian activity, and conservation status. The failure of the Lenten Street scheme demonstrates that buildouts and similar features should not be relied upon to justify the acceptability of the development - especially where they will likely create new or exacerbate existing problems.

Crucially, if planning permission is granted and the highway authority later determines that the proposed interventions are ineffective or harmful - requiring removal or redesign - it will be too late. The housing will already have been approved, and the community will be left to absorb the consequences of a flawed mitigation strategy. The planning authority and highway authority must learn from this documented failure and avoid repeating it in Holybourne.

7. Construction Traffic and Road Safety

The application fails to assess the impact of construction traffic over the anticipated four-year build period; yet HCC are silent on this issue. This omission is critical given the constrained road network and high pedestrian activity in Holybourne. Increased vehicle numbers will inevitably raise the potential for conflict, especially in areas with narrow pavements and poor visibility.

8. Traffic Modelling and Junction Impacts

HCC, like HVA, identifies that the modelling lacks robustness and should include sensitivity testing to account for uncertainties in trip rates, distribution, and future growth. HVA agrees that this all needs to be revisited; but would assert that this needs to be independently reviewed rather than by the applicant's consultant who, despite two pre-apps with HCC, has failed to present acceptable data to enable full consideration of the impacts of the development upon the road network and safety.

Of particular concern:

- The modelling relies on assumptions that are demonstrably flawed and inconsistent with real-world conditions in Holybourne.
- According to the submissions, the London Road (North) arm of the London Road/Montecchio Way/Garstons Way junction would operate at 99.8% Degree of



Saturation (DoS) in the AM peak - effectively at capacity - and queue lengths would increase with serious implications for access, emergency services, and school traffic.

- The modelling omits key routes such as Church Lane and Brockham Hill, which are regularly used by local traffic and pedestrians, including wheelchair users from Treloars.
- Whilst the emerging Local Plan currently carries limited weight, the decision to model only committed developments - and to ignore any consideration of what future allocations might entail - is a significant concern. Given recent revisions to the NPPF and the new standard method for calculating housing need, it is clear that further growth is coming. The uncertainty lies not in whether, but in how much and where - and specifically, how Holybourne will be treated in the settlement hierarchy. Supporting an application that is so clearly contrary to the current development plan, and relying solely on committed schemes brought forward under that plan, without any regard for future growth scenarios, risks undermining the very principle of a planned system. The NPPF is clear that infrastructure should be planned strategically and cumulatively. To proceed otherwise is to make piecemeal decisions that may lock in suboptimal outcomes for both the community and the wider network.

Conclusion and Request

HCC's objection to the current application is welcomed. We note however that the tone is technical and solution-focused - ignoring wider considerations of infrastructure capacity, local character, and distinctiveness. We therefore urge HCC to reconsider its current approach, and to engage directly with the community before endorsing a highway strategy that risks undermining the character, safety, and sustainability of Holybourne.