



**Subject: Holybourne Village Association Response to Conservation Officer
Comments – EHDC-25-0748-OUT**

We acknowledge and welcome the Conservation Officer's objection to the proposed development. However, we are concerned by the inconsistency in the level of harm identified between the EIA screening stage and the planning application stage.

1. Inconsistency in Harm Assessment

At EIA screening (May 2025), the Conservation Officer stated that the development had the potential to cause substantial harm to heritage assets, sufficient to warrant an Environmental Impact Assessment. Yet, in the planning application response (September 2025), the same officer concludes that the scheme would result in less than substantial harm, at a "medium level" within that bracket.

This shift is not explained, and it is particularly concerning given that:

- The scheme has not materially changed in terms of its impact on heritage assets;
- The indicative layout remains broadly the same; and
- The officer previously identified the erosion of the rural setting as a key concern.

We request clarification on what new evidence or design changes have led to this revised assessment.

2. Ambiguity in Site Definition and Study Area

There is ambiguity between the application site (wholly to the east of the church) and the study area referenced in the Heritage Impact Assessment (HIA), which includes land to the north of the church. This has led to confusion in the officer's comments, particularly regarding:

- The identification of sensitive areas; and
- The assessment of views and setting.

We ask that the officer clearly distinguish between the application site and the broader study area when assessing impact.

3. Lack of Assessment of Key Views and Seasonal Variation

The officer's comments seem to accept the HIA assessment that the setting of the church is only appreciable from elevated fields to the north. The church spire however is clearly visible from the application site and beyond, including from the existing play area of London Road. The officer's response therefore does not adequately assess the impact on the setting of the Church of the Holy Rood in this context, particularly:



- Views from within and across the application site, which are widely appreciated by the community; and also
- Seasonal variation: in winter, vegetation along field boundaries is sparse, and the church's prominence in the landscape is significantly heightened.

We therefore would request confirmation of whether the officer has visited the site in both summer and winter conditions, and whether they have fully appreciated the church's visibility and prominence in the landscape.

4. Ambiguity Around 'Low Buildings'

The officer refers to the need for "low building heights" in sensitive parcels. It is unclear whether this refers to bungalows or simply reduced ridge heights. This should be clarified, as it has implications for the scale and massing of development near heritage assets.

5. Substantial Harm and Appeal Precedents

While the Conservation Officer concludes less than substantial harm, we note that:

- The HVA has identified substantial harm to the Grade II* Church of the Holy Rood, Manor Farm House, and the Conservation Area.
- Appeal decisions (e.g. Ascott-under-Wychwood) demonstrate that even less than substantial harm can still provide clear reasons for refusal, particularly where harm affects assets of the highest significance.

We urge the Council to give great weight to the conservation of designated heritage assets, as required by paragraph 213 of the NPPF, and to apply the public interest tests rigorously.