



Subject: HVA Follow-Up to Hampshire County Council's (HCC) Public Rights of Way (PROW) Consultation Response – Planning Application EHDC/25/0748/OUT

Overview

This response critiques HCC's consultation submission regarding planning application EHDC-25-0748-OUT, highlighting strategic and policy-based shortcomings in its support for the proposed development. While HCC focuses on physical upgrades to the PROW network, it fails to address the broader landscape, experiential, and community impacts that arise from urbanising the countryside setting of these routes.

Key Points of Rebuttal

1. Loss of Countryside Setting

HCC's response prioritises surfacing and connectivity improvements but fails to acknowledge that urbanising the setting of these footpaths actively undermines their value as countryside access routes. The National Planning Policy Framework (NPPF) calls for enhancement of access to the countryside - not through its replacement with suburban development. The proposal erodes the very landscape that gives these routes their recreational, ecological, and mental health value.

2. Scale of Development Conflicts with Settlement Strategy

The development lies outside the settlement boundary and represents a 30% increase in village size, contrary to JCS Policy CP10's emphasis on small-scale local development in Tier 4 settlements like Holybourne. HCC's support for increased footpath usage fails to consider that the scale of development is incompatible with the village's capacity, and the resulting urbanisation will diminish the quality of life for existing residents who rely on tranquil countryside access.

3. Landscape Harm Overlooked

HCC's response does not address the landscape harm identified in EHDC's own Landscape Capacity Study (2018), which classifies the site as part of a regionally important landscape with low capacity for change. The PROWs affected are embedded in this sensitive landscape. Enhancing access while destroying the landscape's character is a contradiction in terms and conflicts directly with JCS Policy CP20.

4. Impact on Designated Local Green Space

The PROWs around Holybourne Play Area are integral to its function and value. HCC's response ignores the loss of visual and experiential connectivity between the Play Area and the surrounding countryside. The development would enclose and urbanise the



Play Area, undermining its designation and violating the spirit of Policy CH5 of the Alton Neighbourhood Development Plan.

5. Misinterpretation of Route Coherence

While HCC seeks to improve surfacing, it fails to consider that route coherence includes landscape context. A footpath through or adjacent to a housing estate is not equivalent to one through open countryside. The Hampshire Countryside Access Plan (CAP) envisions sustainable access to the countryside, not access through its replacement.

Conclusion

HCC's PROW response is technically based but strategically flawed. It prioritises infrastructure over landscape, access over experience, and mitigation over preservation. In doing so, it conflicts with:

- NPPF Paragraphs: 105, 125, 129, 135
- JCS Policies: CP10, CP20, CP29
- Alton Neighbourhood Plan: Policy CH5
- EHDC Landscape Capacity Study (2018)

Enhancing access cannot justify the loss of the countryside setting that gives PROWs their value. The development should be refused on the grounds that it undermines the strategic, environmental, and experiential integrity of the PROW network and the village's rural identity.

The £230k S106 contribution is a mitigation for increased use, not a justification for development. No amount of surfacing or maintenance can restore the tranquil, open countryside once it is urbanised.