



Subject: HVA Follow-Up Historic England's Consultation Response – Planning Application EHDC/25/0748/OUT

1. Lack of Quantification of Harm

Historic England acknowledges harm to the scheduled monument but fails to specify whether it is substantial or less than substantial. This is critical under the NPPF, which requires clear justification and influences whether public benefits can outweigh harm. The HVA contends the harm is substantial, referencing various appeal decisions where even less than substantial harm led to refusal.

2. Inadequate Assessment of Setting

Historic England claims negligible impact on the Church of the Holy Rood's setting. However, the Ascott under Wychwood appeal (APP/D3125/W/23/3332089) found that even limited intervisibility and loss of rural context constituted harm to a Grade II* church. In Holybourne, the church is more visible and widely experienced within the rural landscape within and across the application site. The development would erase key views and diminish its prominence, contrary to Historic England's own guidance and planning precedent.

3. Recreational Infrastructure Within the Monument

Historic England does not object to placing play areas and planting within the monument boundary, despite acknowledging potential archaeological impacts. This trivialises the monument's significance and risks damaging buried remains. No precedent or assurance is provided that such use aligns with best conservation practice. Interpretation boards and mitigation measures should not substitute for preservation.

4. Concerns About Closed-Door Discussions

Historic England invites further private discussions with the applicant, which risks undermining public trust - especially given over 500 objections, many citing heritage concerns. Transparency is essential to ensure community views are considered.

5. Failure to Recommend Refusal

Historic England are being asked to comment on the application in front of them – not on what amendments to the scheme should be made to secure Historic England's support; discussions which should have been had (and listened to) during the pre-application submissions. Despite identifying harm and being unable to assess whether public benefits outweigh it, Historic England does not recommend refusal. This



ambiguity may be misinterpreted as support, contrary to NPPF paragraphs 213–215, which direct refusal where harm is not clearly outweighed.

HVA therefore requests that the Planning Authority

- **Seek Clarification from Historic England:**
 - On the level of harm identified.
 - On the rationale for concluding no impact on the church's setting.
 - On the acceptability of recreational infrastructure on scheduled monuments.
- **Ensure Public Transparency:**
 - Document and publish any further discussions with Historic England.
- **Apply NPPF Rigorously:**
 - Refuse if harm is substantial unless justified exceptionally.
 - Give great weight to conservation even for less than substantial harm.
- **Give full and appropriate regard to Appeal Precedents in determining how to apply heritage policies:**
 - The Torrisholme Bowl Barrow, Wormegay, Wyboston, Southerminster, Sherfield on Loddon, and Holybourne appeal decisions provide strong support for refusal in similar contexts.