



**Holybourne Village Association (HVA) Response to Consultation Comments on EHDC-25-0748-OUT**

**To: East Hampshire District Council Planning Team**

**Re: Land to the rear of 136–150 London Road, Holybourne – EHDC-25-0748-OUT**

**From: Holybourne Village Association (HVA)**

**Date: 26<sup>th</sup> July 2026**

We write in response to the consultation comments received from the Environment Agency and the Lead Local Flood Authority (Hampshire County Council) regarding the above application. While we welcome their engagement, we are concerned that both responses appear to accept the applicant's assertions at face value and fail to engage with the specific local flood risk context and policy requirements.

**1. Failure to Address the Sequential Test Requirement**

Both consultees acknowledge the presence of shallow groundwater and a spring within the site. However, neither addresses the requirement for a Sequential Test, despite:

- The site being identified in EHDC's Strategic Flood Risk Assessment (SFRA) as having potential for groundwater flooding to occur at the surface.
- The applicant's own FRA confirming groundwater flooding risk and the presence of a spring-fed ditch.
- National Planning Policy Framework (NPPF) Paragraph 173 requiring a sequential, risk-based approach to development in areas at risk from *any* form of flooding.

The Environment Agency's own guidance confirms that a Sequential Test is required in Flood Zone 1 where the SFRA identifies increased flood risk. The omission of this test is a fundamental policy failure and must be addressed before the application can be determined.

**2. Mischaracterisation of Design Responses as Neutral**

The Lead Local Flood Authority notes that the applicant proposes to raise site levels and omit infiltration due to high groundwater. These are not neutral design choices - they are direct responses to flood risk. The field currently acts as a natural sponge, absorbing and regulating spring flows. Replacing this with engineered attenuation and discharge to sewer fundamentally alters the site's hydrological function.



This change introduces risk to downstream properties and infrastructure, particularly given the existing reports of flooding in the area. The LLFA's objection to ground raising is noted, but the implications of this objection are not fully explored.

### **3. Lack of Engagement with Local Evidence**

Neither consultee references the extensive local evidence submitted by HVA, including:

- Video documentation of flooding in the Lavant Field.
- Community-led mapping of spring-fed flows through Holybourne.
- Evidence that borehole testing was limited due to wet conditions, undermining the reliability of groundwater data.

This omission is concerning, particularly given the Environment Agency's acknowledgment that the site lies on a principal aquifer with shallow groundwater and that infiltration SuDS are not appropriate.

### **4. Policy and Precedent**

The application is contrary to:

- JCS Policy CP25, which directs development away from areas at risk of groundwater flooding.
- NPPF Paragraph 174, which states that development should not be permitted if reasonably available sites exist in areas of lower flood risk.
- Recent appeal decisions (e.g. Fairlight Cove, Bailrigg Lane) where failure to undertake a Sequential Test in similar groundwater contexts led to refusal.

### **Conclusion and Request**

We respectfully request that EHDC:

- Require the applicant to undertake a Sequential Test, as mandated by national and local policy.
- Reassess the application in light of the LLFA's objection to ground raising and the EA's concerns about groundwater sensitivity.
- Give due weight to the local evidence submitted by HVA and the community.