



Subject: Planning Application EHDC/25/0748/OUT – Thames Water Comments and Infrastructure Concerns

We have reviewed Thames Water's consultation response dated 25 July 2025 and wish to raise the following points in response, particularly in light of the objections already submitted by the Holybourne Village Association.

1. Lack of Early Engagement with Infrastructure Providers

It is concerning that Thames Water has had to request a planning condition to assess foul and surface water capacity post-permission, having been unable to reach agreement with the developer in time. This suggests that the applicant did not engage meaningfully with Thames Water prior to submitting the application – surely a basic expectation for a scheme of this scale. This reflects a broader pattern in the application: infrastructure is listed, but not properly assessed for capacity or deliverability.

2. Foul and Surface Water Infrastructure Capacity Remains Unconfirmed

Thames Water's own data confirms 375 hours of sewage discharge into the River Wey over the past three years due to system overload. Their response does not dispute this, and fails to provide any assurance that the proposed development can be accommodated without exacerbating existing failures. Deferring this assessment to post-permission conditions undermines the principles of sustainable development and policy compliance under JCS Policy CP26 and the NPPF.

3. Sustainability Claims Not Supported by Capacity Evidence

Holybourne is a rural level 4 settlement with a limited but vital range of local services. The application repeatedly asserts sustainability based on proximity to infrastructure – some within a 10 minute walk from the application site, but the majority much further afield and outside of the settlement. In any event, while the application lists the infrastructure, it wholly fails to demonstrate that the infrastructure can actually support a development of this magnitude. For example:

- **Primary School:** Andrews Endowed has some spare capacity, but not enough to accommodate the estimated 40 primary-aged children generated by 160 dwellings. The application simply notes that the school is within walking distance, without addressing capacity shortfall or mitigation.
- **Healthcare:** The NHS consultation response confirms that both Alton surgeries are already operating 6,337 patients over capacity. While a £100,000 s106 contribution has been requested, there is no guarantee this will be spent on the nearest surgery, nor that it will create new capacity. Again, the application



asserts sustainability based on proximity to the Wilson Practice, with no mention of capacity and deliverability.

This approach - listing infrastructure without assessing whether it can support the development - is misleading and contrary to the requirements of the NPPF and local policy.

4. Flood Risk and Groundwater Infiltration

Thames Water acknowledges high infiltration flows in this catchment, but does not address the specific groundwater flooding risks identified in EHDC's Strategic Flood Risk Assessment or the evidence submitted by the community. The site is known to host active lavant springs and acts as a natural attenuation area. The absence of a Sequential Test remains a clear reason for refusal under both JCS Policy CP25 and the NPPF.

Conclusion

We therefore reiterate our concerns and submit that the application should not be approved unless and until:

- A Sequential Test (covering a robustly defined Sequential Test Area) is undertaken and demonstrates that no reasonably available sites exist at lower flood risk;
- In the event (and only after) a Sequential Test identifies that there are no reasonably available sites at lower flood risk, a full drainage strategy is submitted and independently reviewed;
- Thames Water confirms in writing what upgrades are required, how they will be funded, and when they will be delivered; and
- Infrastructure capacity is properly assessed and evidenced - not simply listed - with clear mitigation measures secured.