



Holybourne Village Association's (HVA) Response to EHDC Landscape Officer Comments

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

Date: January 2026

Executive Summary

The proposal, by virtue of its scale, form and siting within Local Area 4b.1 (Alton to Bentley – north of the A31), would urbanise an open and sensitive rural valley-side landscape identified by EHDC's Landscape Capacity Study (2018) as having medium/low capacity for change with skyline and open valley views of regional importance, where only very small-scale development might be accommodated and the area should otherwise remain undeveloped. It would extinguish the only surviving public approach views of Holybourne Down from London Road, eroding the village's rural identity and settlement-edge legibility. These harms are not capable of being mitigated by landscaping, height-stepping or architectural detailing. The scheme therefore conflicts with Policies CP20 and CP29 of the East Hampshire Joint Core Strategy and paragraphs 129 and 135 of the NPPF. Consistent with the Bentley appeal decision (APP/M1710/W/23/3332327), substantial weight is attached to the conflict with the settlement's role and rural character in the planning balance.

In the Bentley appeal, EHDC characterised comparable harm arising from the loss of open green fields at a Level 4 village edge as intrinsic and unacceptable in principle, describing the proposal as a "*suburban form of development entirely at odds with the established character*" which would "*provide a new tier of built form encroaching onto this open field*" and have a "*divorced appearance from the village*". Crucially, the Council expressly rejected reliance on landscaping or planting as remedial measures, concluding that the resulting significant landscape harm would not be mitigated by design evolution and, of itself, outweighed housing benefits notwithstanding housing land-supply considerations. The same development-plan policies (CP20 and CP29) and landscape context apply here, yet materially comparable harm is now treated by the Landscape Officer as capable of resolution through further design refinement, without explanation as to why harm previously found to be decisive in Bentley should be approached differently in Holybourne.



The Landscape Officer's response understates the gravity and nature of landscape harm by treating it as a matter capable of design-stage mitigation and reserved-matters control. That approach is inconsistent with:

- EHDC's own evidence base (2019 Site Assessments Background Paper; 2021 Strategic Site Options SA) that rejects Holybourne for large-scale growth on landscape, heritage and flood grounds.
- The EHDC Landscape Capacity Study (2018) for Local Area 4b.1 (Alton to Bentley—north of A31), identifying low capacity for change and a regionally important landscape with sensitive skyline and open valley views; only “very small” development might be accommodated and otherwise the area should remain undeveloped.
- The Bentley appeal (APP/M1710/W/23/3332327): an EHDC Level-4 village decision upheld on landscape/character and settlement-hierarchy grounds notwithstanding housing supply, within the same district policy framework and Northern Wey Valley landscape family.

Crucially, the response fails to engage with the unique, gateway role of the London Road views to Holybourne Down - by the Officer's own methodology the most sensitive receptors remain minor to moderate adverse even at Year 15; where harm is experiential loss of openness, mitigation does not cure.

Planning consequence: even accepting the LVIA “method” at face value, the nature of the harm here is qualitative, irreversible, and settlement-defining; it is therefore a matter for the decision-maker to attach decisive weight under JCS Policies CP20/CP29 and the NPPF, consistent with Bentley and other recent appeal reasoning.

The Landscape Officer's re-consultation response (January 2026), while welcoming modest localised layout changes, continues to seek further reductions in height and density along multiple settlement edges, underlining that the harm identified is inherent to the site's form and location rather than capable of resolution through detailed design.



1) Methodology Acceptance is Not a Green Light

What the Officer says

- LVIA methodology is “competent and thorough”; adverse effects acknowledged; many minor–moderate adverse residuals at Year 15. Mitigation and architectural detailing are said to be “key to integration.”

Why that’s unsound in this context

- In Local Area 4b.1, EHDC’s own Landscape Capacity Study says development capacity is “medium/low,” constrained by rural character, open valley views, skyline sensitivities, and historic context; at most “very small” change may be possible; “the area should otherwise remain undeveloped.” A 160-unit estate is, by definition, not “very small” and not “sensitively integrated.”
- The Officer identifies multiple viewpoints with persistent adverse effects at Year 15 - particularly from higher ground to the north/north-east and from the settlement edge - then assumes mitigation will make this OK. Adverse effects that remain after “full mitigation” are by definition significant in principle when they erase openness and rural edge legibility.

Planning point: Acceptance of method should not imply acceptance of outcome.

Where residual harm remains to sensitive viewpoints and settlement edge character, it weighs decisively against under CP20/CP29 and NPPF 129/135 (maintaining prevailing character/setting; sympathetic to local character). EHDC’s 2018 Landscape Capacity Study and HVA’s landscape paper demonstrate why “mitigation” cannot replace lost openness.

2) The London Road / Holybourne Down View is a Gateway View

What the Officer does not address

- The only remaining public view of Holybourne Down from London Road - the primary approach and conservation-area spine - is treated in the LVIA as one viewpoint among many. The report ignores its unique role in announcing the village’s rural identity.

Evidence

- The Alton Neighbourhood Plan identifies that the Play Area/LGS and the London Road corridor provide “outstanding countryside views” fundamental to sense of place and LGS value; the site sits within 4b.1 with low capacity and key



skyline/open valley sensitivities. Loss of this gateway view is not mitigable by planting, roof-stepping, or parameter tweaks.

Planning consequence: This is a threshold view for a Level-4 settlement. Once built form sits across the only surviving approach view to Holybourne Down from London Road, openness is extinguished. That qualitative change pushes harm across the “acceptable/tolerable” line, consistent with landscape/character reasoning in Bentley (settlement role exceeded; rural identity harm) and Southminster/Tibberton (open countryside encroachment not rescued by landscaping).

3) Northeastern High Ground / Roofscape “Tuning” Will Not Save the Scheme

What the Officer suggests

- Consider reducing density/heights along north & north-east edges; more fine-grained heights plan; “successful implementation is key.”

Why that misses the point

- EHDC’s capacity study identifies open skyline and valley views as core sensitivities; any estate form across this slope fundamentally urbanises the skyline edge - even bungalows cannot replicate open rural landform. This is ‘form-of-development harm’, not just scale.
- Recent appeals (e.g., Southminster) confirm that landscaping, setbacks or height-steps did not ameliorate landscape character harm where development conspicuously intruded into open rural foregrounds on village approaches; harm remained very substantial.
- The Landscape Officer’s re-consultation response (January 2026), while welcoming modest localised layout changes, continues to seek further height and density reductions along multiple settlement edges, confirming that the identified harm arises from the site’s fundamental form and location rather than from detailed design alone.

Planning consequence: Height “tuning” is cosmetic. It does not restore openness, tranquillity, or downland skyline legibility that underpin CP20 (distinctiveness/tranquillity) and CP29 (relationship to landscape features).

4) Local Green Space (LGS) and Landscape Value are Joined at the Hip

What is missing in the Officer note



- No analysis of the LGS's landscape function at the village gateway, despite HVA evidence that its "outstanding countryside views" (Source: Alton Neighbourhood Plan) are defining of place and recreational value.

Why that omission is serious

- The LGS's value is visual, experiential, and communal - part of the landscape receptor set. The Officer's silence artificially narrows "landscape" to planting/typology mitigation, ignoring the plan-led protection of a space whose value resides in openness and views. This under-counts harm to CP20 (distinctiveness/tranquillity) and ANP Policy CH5 principles.

5) EHDC's Own Evidence Base Confirms the Landscape Risk (and More)

- **2019 Site Assessments Background Paper** and **2021 Strategic Site Options SA**: Holybourne failed for large-scale growth - sensitive rural edge, medium/low capacity, urbanisation risk, heritage/landscape constraints and very extensive groundwater risk. Nothing material has changed at the site.

Planning consequence: When EHDC's published Holybourne-specific evidence is applied as intended - including the Site Assessments, Strategic Site Options SA and the Landscape Capacity Study that underpins Policy CP20 - the conclusion is clear. The site performs a sensitive rural edge and valley side function with limited capacity for change, and cannot accommodate estate-scale development without unacceptable harm to rural character, landscape function and settlement identity.

6) Appeal Precedents: Landscape Harm and Settlement-Edge Integrity

Status of Appeal Decisions

Recent appeal decisions are material considerations where they address comparable development plan policies, landscape functions and settlement contexts. While each proposal must be determined on its own merits, the Local Planning Authority is required to engage with such decisions substantively by identifying points of similarity and difference and explaining the weight assigned to them.

The following appeal decisions are directly relevant to the landscape and settlement-edge issues raised by the current proposal and strongly corroborate the conclusions reached in this rebuttal.

Bentley – APP/M1710/W/23/3332327 (May 2024)



The Bentley appeal provides a strong district-level comparator under the same EHDC policy framework and within the same Northern Wey Valley landscape character area.

The Inspector dismissed an outline scheme on the basis that the proposal would result in the loss of openness and erosion of settlement identity at the village edge, undermining the distinction between suburban development and its rural setting. Of particular relevance, the Inspector found that:

- residual landscape harm to openness and village character remained after mitigation;
- planting and boundary treatments could not overcome the fundamental incompatibility of estate-scale development in that location; and
- such harm attracted substantial weight in the planning balance, outweighing housing benefits even under the tilted balance.

The reasoning confirms that where development alters settlement-defining landscape structure and erodes the rural edge, mitigation secured at outline stage does not neutralise the harm.

Southminster – APP/X1545/W/24/3351697 (March 2025)

The Southminster appeal is particularly instructive in relation to gateway views and the experiential role of openness on village approaches.

In dismissing an outline proposal for up to 220 dwellings, the Inspector placed very substantial weight on harm arising from the loss of open agricultural land on the approach to the village. The Inspector found that:

- gateway and approach views play a critical role in conveying rural context and settlement identity;
- the erosion of openness on arrival to a settlement is an experiential harm, not a matter of visual tidying;
- landscaping, lower building heights and design refinements did not prevent substantial residual harm at Year 15; and
- such residual harm was determinative, even in the context of a significant housing land supply shortfall.



This reasoning closely aligns with the role of the London Road approach views to Holybourne Down, where the harm arises from the loss of openness and rural legibility, not from insufficient design detail.

Holybourne (Howards Lane) – APP/M1710/W/23/3332373 (November 2024)

This appeal decision is of particular and direct relevance, as it concerns development within Holybourne itself, determined under the same East Hampshire Joint Core Strategy and in the context of an accepted five-year housing land supply shortfall.

Although the appeal site at Howards Lane was located centrally within the Holybourne Conservation Area rather than at the settlement edge, the Inspector's reasoning was not dependent on that central location, but instead on the loss of openness and erosion of the spatial structure that defines Holybourne's rural character. The Inspector found that development extending beyond established building lines into open land associated with the stream corridor would introduce a suburbanising form of development, sever spatial and visual relationships fundamental to the village's identity, and materially harm its rural character.

Of critical importance, the Inspector expressly rejected the argument that landscaping, tree retention or design refinement could address this harm, concluding that such measures would not remedy the spatial and experiential loss of openness. The appeal was dismissed notwithstanding the modest scale of development (four dwellings), the presence of nearby residential development, and the acknowledged housing supply position.

The significance of this decision lies in the principle it establishes for Holybourne as a whole: that development which erodes openness and undermines the spatial relationships between built form and defining landscape features carries decisive weight against approval, even where heritage harm is less than substantial and housing benefits are recognised. That conclusion applies irrespective of whether a site is centrally located or peripheral.

When properly understood, the distinction in site location strengthens rather than weakens the relevance of this appeal. If such harm was found unacceptable within a more enclosed and historically developed part of the village, it follows logically that greater harm to openness, legibility and rural character at the settlement edge and on village approaches must attract at least equal - if not greater - weight. The current proposal, which would result in the loss of open land forming the last remaining gateway views to Holybourne Down from London Road and materially alter the village's



relationship with the surrounding landscape, engages the same principle with greater force.

Accordingly, the Howards Lane decision establishes a clear internal benchmark for Holybourne: loss of openness and spatial integrity is not a matter capable of mitigation through design evolution or reserved matters, and carries decisive negative weight in the planning balance. Any departure from that approach in the present case would require a clear and reasoned distinction under the same policy framework.

Implications for the Current Proposal

Taken together, these appeal decisions demonstrate a consistent and robust line of Inspector reasoning that directly supports the conclusions of this rebuttal:

- the loss of settlement-defining openness at village edges and on approaches carries decisive weight;
- gateway views and approach landscapes are qualitatively different from ordinary viewpoints and are not capable of being mitigated through planting or layout control;
- residual adverse effects after mitigation are not a technicality but a substantive planning harm; and
- landscape harm of this nature can outweigh housing benefits even where the tilted balance applies.
- Each of these findings directly engages CP20's requirements on landscape distinctiveness and CP29's relationship between development and landscape features.

In the specific context of Holybourne, the recent Howards Lane decision is especially compelling and requires the Local Planning Authority to explain clearly why significantly greater landscape harm would now be judged acceptable under the same policy framework. In the absence of such a reasoned distinction, consistency with recent appeal reasoning points firmly towards substantial negative weight being attached to the landscape and settlement-edge impacts of the proposal.

7) EHDC Consistency of Decision Making – The Bentley Appeal

The Landscape Officer's current approach to the Holybourne proposal sits in marked contrast to East Hampshire District Council's own position in the Bentley appeal



(APP/M1710/W/23/3332327), which concerned development in a Level 4 settlement within the same policy framework and Northern Wey Valley landscape context.

In Bentley, EHDC consistently treated landscape harm arising from the loss of open green fields at the settlement edge as a matter of principle, not a defect capable of resolution through mitigation or design refinement. This is explicitly evident in the Landscape Officer's comments to the application consultation, in the Case Officer's recommendation report, and in the statement of case EHDC presented to (and defended at) the Public Inquiry.

The Council expressly concluded that the introduction of housing would create a ***“suburban form of development entirely at odds with the established character”***, would ***“provide a new tier of built form encroaching onto this open field”***, and would result in development with a ***“divorced appearance from the village”*** that failed to respect its identity and rural setting. EHDC attached decisive weight to the role of the site as a visual break and as land that ***“cushions the village providing it with its distinctive rural setting”***.

Critically, EHDC rejected reliance on landscaping and planting as remedial measures, stating in its appeal evidence that landscape enhancement and additional tree planting were not a benefit and that the scheme would result in significant landscape harm which would not be mitigated by planting. This conclusion was reached notwithstanding an acknowledged housing land supply shortfall and the delivery of affordable and self-build housing.

By contrast, in Holybourne the Landscape Officer now treats comparable harm - arising from the loss of open land at the settlement edge and the erosion of settlement-defining openness - as potentially resolvable through further height reduction, density adjustment and reserved-matters mitigation. No explanation is provided as to why harm that EHDC previously characterised as intrinsic, irreversible and decisive in Bentley should now be regarded as a design-stage matter in Holybourne, notwithstanding the latter's similarly sensitive edge-of-village position and gateway role.

Absent of a clear and reasoned distinction between the two cases, the current approach represents an inconsistent application of Policies CP20 and CP29. Applying the same reasoning adopted and defended by EHDC at the Bentley inquiry leads inevitably to the conclusion that the Holybourne proposal results in unacceptable landscape and settlement-edge harm that cannot be mitigated. This harm should attract decisive negative weight in the planning balance.



8) Conclusion and Decision-Making Guidance

Accepting the Officer's methodology does not oblige the LPA to accept the outcome. The site sits within a landscape parcel (4b.1) that EHDC judged regionally important, low-capacity, and sensitive to open skyline/valley views with scope only for very small change; the application proposes the opposite - a large suburban extension obliterating the only surviving approach view of Holybourne Down along London Road.

Bentley confirms that in Level-4 villages the role/scale and rural character harm carry decisive weight, even under tilted balance. Holybourne's constraints (LGS, SAM setting, 4b.1 low capacity, and the last open approach view) are at least as strong - and in several respects stronger.

Accordingly, on landscape grounds alone - before adding the separate and independent heritage (SAM/II*), LGS, flood risk, settlement hierarchy and highways urbanisation harms - the proposal fails CP20 and CP29 and conflicts with NPPF 129/135. The correct and plan-led conclusion is to give very substantial negative weight to landscape/settlement-identity harm and refuse.