



HOLYBOURNE VILLAGE ASSOCIATION
Response to Village Wide Highways Scheme
Planning Application: EHDC/25/0748/OUT
Date: January 2026

1. Introduction

Holybourne Village Association (HVA) submits this formal response to the proposed highways scheme issued as part of the current re-consultation for application EHDC/25/0748/OUT. The updated proposals incorporate a village-wide London Road redesign, including multiple build-outs, formalised parking bays, extensive double-yellow lining, Copenhagen-style crossings, footway widening, and continuous traffic-calming features.

HVA is seriously concerned that the scale and character of these engineered interventions represent a fundamental shift in the function and identity of Holybourne - a Tier 4 rural village, much of which lies within a designated Conservation Area.

This response sets out HVA's reasons for objecting to the revised scheme, particularly where the proposals are disproportionate, harmful to village character, and fundamentally undermine the sustainability justification advanced for the development. The scheme would also result in the removal of long-established on-street parking along London Road, displacing vehicles into already constrained side roads and impacting residents who rely on those streets for access and parking. Taken together, these effects would create congestion and safety risks amounting to a severe residual cumulative impact on the local road network, thereby providing a clear basis for refusal under NPPF paragraph 116.

The following sections address outstanding information, policy conflicts, and the wider implications of the proposed interventions.

2. Outstanding Information - HVA's Previous Representations

HVA has consistently raised significant concerns regarding the safety, impact, and adequacy of the Transport Assessment. These matters were raised with the benefit of local knowledge and lived experience, which the applicant's consultants do not possess. They include issues around trip generation assumptions, construction traffic,



safety, and the cumulative impact on the local network. None of these matters are acknowledged or addressed in the applicant's recent submissions, which should reasonably have been expected.

For the purposes of transparency and good practice, we will expect that East Hampshire District Council will ensure that these issues are fully addressed before any determination is made.

3. HCC Highways' Objection with Regards the Highways Works

HCC Highways' consultation response to the application is explicit - the site, as it currently exists, is not sustainably located.

HCC Highways identify that the site is not sustainably accessed, that there is inadequate pedestrian and cycling infrastructure to and from the site, substandard walking conditions, incomplete LCWIP connections, and that the applicant relies on unsubstantiated assumptions regarding a 'vision-led' modal shift. As matters currently stand, the planning application has failed to demonstrate that an attractive or safe environment for walking and wheeling to and from the site can be provided. The proposal therefore fails to meet the sustainable transport objectives of NPPF paragraph 110.¹

HCC Highways state clearly that without a comprehensive package of interventions – including a 20mph zone, build-outs, shared cycle provision, controlled crossings, PRow upgrades and LCWIP route improvements – the development cannot be considered sustainable. They identify the site as car-dominated, with no realistic opportunity for walking and cycling unless these measures are delivered. Their objection is explicitly framed around the NPPF requirement for a vision-led approach and the failure of the proposed development, in its current form, to deliver credible modal shift.

¹ For the avoidance of doubt, HVA does not accept that delivery of the full package of village-wide highways works would render the application site locationally sustainable in planning terms. As set out in HVA's Supplementary Note G – *Failure to Support EHDC's Sustainable Transport Objectives*, the site would remain inherently car-dependent when assessed against the settlement hierarchy, Sustrans' 20-minute neighbourhood principles, limited bus provision, and the distribution of everyday services. While the highways works identified by Hampshire County Council may be necessary, their delivery would not overcome HVA's objection to the development on locational sustainability grounds. Nothing in this consultation response should be read as altering HVA's previously stated position on that matter.



In short, HCC Highways is not prepared to support the application in the absence of a village-wide highway transformation. In response to this objection, the applicant has advanced a wholesale transformation scheme, not as mitigation proportionate to the impacts of the development, but as a means of retrospectively manufacturing the appearance of sustainability so that the proposal can pass the NPPF tests.

It is important to recognise that this is the applicant's scheme, not an HCC-led or village-identified project. Moreover, HCC Highways have identified numerous unresolved concerns regarding the detail, effectiveness and deliverability of the proposals, such that they have expressly stated that the Highway Authority cannot yet confirm the scheme is acceptable, nor that it would secure the required outcomes.

HCC Highways' consultation response is, appropriately, confined to issues within their professional remit: transport, access and highway safety. It does not and cannot address other fundamental considerations relevant to whether the site is sustainably located, including flood risk and drainage constraints, settlement hierarchy compliance, loss of Designated Green Space, heritage and landscape impacts, or wider infrastructure capacity. The absence of comment on these matters should not be interpreted as implying that the Highway Authority considers them capable of being resolved.

Crucially, even if it were assumed that the applicant could ultimately devise a highway scheme capable of satisfying HCC Highways' technical requirements, and even if HCC Highways and East Hampshire District Council had full confidence that such a scheme could be delivered in practice, that would not resolve the overarching planning objection. When the highways issues are considered in the round, alongside the non-highways constraints affecting the site, the proposal would still fail the NPPF tests of sustainable development. The site would remain unsustainably located, not because of transport considerations alone, but because of the cumulative and independent policy conflicts that the application fails to overcome.

4. The Revised Highways Scheme: A Placemaking Retrofit, Not a Rural Safety Solution

The applicant's submissions seek to legitimise the proposals as an urban LCWIP corridor transformation. They refer to creating an "attractive environment for walking",



the formalisation of traffic calming, and the requirement for consistent build-outs, continuous engineered interventions and speed-reduction environments. This framing originates from the applicant, not from any demonstrated village-level requirement, and is used to recast London Road as a corridor in need of wholesale urban intervention. The result is a scheme intended to retrofit an appearance of sustainability in order to support the development, rather than proportionate measures arising organically from Holybourne's existing function, character or safety record.

These are placemaking measures - not proportionate rural safety interventions. They are engineered solutions entirely inconsistent with Holybourne's character as:

- a Tier 4 rural settlement;
- with a Conservation Area at its heart; and
- a historic streetscape that has evolved organically over centuries.

The new scheme would:

- require removal of verdant approaches into the village;
- narrow carriageways;
- introduce engineered urban crossings;
- necessitate excessive street signage;
- install regimented parking bays;
- extend double-yellow lines throughout the village; and
- fundamentally alter the rural and historic aesthetic.

This level of re-engineering is not mitigation; it is suburbanisation by default - introduced not to address existing village needs, but to artificially enable a 160-home housing estate to satisfy NPPF sustainability tests.

5. The Internal Contradiction: Claiming the Village Is Sustainable While Undermining Its Services

The application repeatedly relies on the presence of village facilities to argue that the site is "sustainably located," including:

- the Post Office and shop;
- village hall;
- primary school;
- pub;
- play area;



- cricket ground;
- Treloar's;
- care home;
- Holybourne Theatre; and
- Jehovah's Witness Hall.

Yet the proposed highway scheme would:

- remove or restrict on-street parking relied upon by these facilities;
- displace parking into already constrained side streets;
- limit access for parents, elderly residents, carers and visitors;
- restrict loading, drop-off and short-stay convenience parking;
- reduce the commercial viability of the shop, Post Office and pub; and
- impede access for evening and weekend community events.

No assessment has been undertaken to understand the impacts of parking restriction on each of these facilities. This reveals a fundamental internal inconsistency within the applicant's case. The same village services relied upon to justify the site's sustainability would be materially harmed by the highway interventions proposed to render the site "sustainable". It is not reasonable to cite accessibility to village facilities as evidence of sustainable location while simultaneously degrading access to those same facilities through restrictive traffic management.

6. The Parking Paradox – Full Standards for New Residents, Reduced Parking for Existing Community

EHDC is explicit that the development must provide:

- full EHDC parking standards;
- visitor parking spaces;
- private driveways; and
- secure cycle storage for future residents.

Yet the proposed mitigation scheme would:

- remove long-established informal parking along London Road;
- introduce extensive double-yellow line restrictions;
- remove existing lay-bys and verge parking;
- formalise parking into a reduced number of bays; and



- restrict evening and weekend parking relied upon by community facilities (including the Theatre, Treloar's, Jehovah's Witness Hall, Care Home, village hall, pub, shop, play area and cricket club).

The applicant therefore secures the benefit of delivering 160 new dwellings with full private parking provision, whilst existing residents, businesses and community users - many of whom have no alternative off-street parking - are required to absorb the resulting displacement and loss of parking capacity.

In practical terms, new residents gain comprehensive parking provision as part of the development, while the existing community experiences a net reduction in accessible parking. This represents an inequitable and unsustainable outcome, arising directly from the proposed mitigation strategy, and undermines the claim that the development would support a healthy and inclusive village environment.

7. The Vision-Led 44% Sustainable Mode Share Assumption Is Fundamentally Flawed

The applicant's assessment relies on the assumption that:

- 44% of all trips generated by the development will be undertaken by walking, cycling or public transport.

This assumption is not supported by existing conditions in Holybourne. In particular:

- Alton railway station is approximately 2km from the site and accessed via routes that are currently substandard for walking and cycling;
- bus services within the village are infrequent and irregular, with limited daily provision;
- the village is served by rural lanes rather than continuous, high-quality cycle infrastructure; and
- there is no empirical evidence of existing sustainable mode uptake at anything approaching the levels assumed.

Importantly, Hampshire County Council, as Highway Authority, has explicitly raised concern regarding the proposed uplift in sustainable mode share, particularly the increase in public transport use, noting that the distance to the railway station and the limitations of local bus services raise doubts as to whether such levels of modal shift are achievable. HCC further state that significant additional infrastructure would be



required before walking and cycling could reasonably be expected to increase to the levels assumed.

In these circumstances, the 44% sustainable mode share does not represent an evidence-based forecast of future travel behaviour. It remains an unvalidated modelling assumption, dependent on extensive yet unresolved off-site interventions, and has not been demonstrated to be deliverable or realistic at outline stage. The figure therefore functions as a modelling device intended to reduce forecast vehicle trips, rather than a reflection of real-world travel choices in Holybourne.

These concerns are not new. They were set out in detail in the HVA's original objections to the application (Supplementary Notes G and H, July 2025), which identified chronic car reliance, flawed trip generation assumptions, and the absence of any demonstrable shift toward sustainable travel modes within Holybourne. None of those issues have been resolved by the applicant's subsequent submissions.

8. Unacceptable Impact Upon Highways Safety and Severe Residual Cumulative Impacts

It is estimated that on-street parking capacity along London Road would be reduced from approximately 110 spaces to around 37 as a result of the proposed highway scheme. The resulting displacement of vehicles into already constrained side streets, combined with the loss of more than two-thirds of existing parking provision, would materially increase congestion, conflict and safety risks across the local highway network. The applicant has not undertaken any assessment to quantify or test these impacts, despite being aware of the scale of parking displacement proposed. In contrast, local evidence of existing parking behaviour and network constraints indicates that the consequences of this displacement would be severe.

In the absence of robust evidence to the contrary, these impacts must be treated as severe residual cumulative impacts. In accordance with NPPF Paragraph 116, such impacts provide a clear and sufficient basis for refusal on highway grounds. This is precisely the scenario paragraph 116 is intended to address: where residual impacts on highway safety and network operation remain severe even after mitigation is proposed.

Attention is drawn to the example of Lenten Street, Alton, where engineered traffic-calming build-outs were introduced by Hampshire County Council and Alton



Town Council with the intention of reducing vehicle speeds and improving safety. Despite being well-intentioned, the scheme resulted in driver confusion, vehicle damage and new safety concerns, and was removed within a short period following local opposition and operational failure. While each location must be assessed on its own merits, this example illustrates the risk inherent in relying on heavily engineered traffic-calming measures within constrained, historic environments.

This precedent demonstrates that such interventions can fail in practice, introducing new hazards rather than resolving existing ones. It reinforces the point that build-outs and similar measures should not be relied upon to justify the acceptability of development where they are proposed primarily to offset traffic impacts arising from that development.

Crucially, if planning permission were granted and the highway authority later concluded that the proposed interventions were ineffective or harmful -necessitating removal or redesign - the decision on the principle of development would already have been taken. The housing would be delivered regardless, and the community would be left to absorb the consequences of a flawed mitigation strategy. Approving the application in these circumstances would embed unacceptable risk into the highway network, contrary to NPPF Paragraph 116 and the requirement under Paragraph 115 to ensure safe and suitable access.

9. The Enlarged Highways Scheme Demonstrates the Site Is Not Sustainably Located

If a development were genuinely located in a sustainable place, it would not require:

- a complete retrofit of London Road;
- five engineered pedestrian crossings;
- multiple build-outs;
- extensive double-yellow line restrictions;
- formalised parking controls;
- new public rights of way upgrades;
- new cycle infrastructure connecting to Alton;
- widespread footway widening; and
- comprehensive reconfiguration of the village public realm.



The scale and nature of the proposed intervention demonstrate the opposite of what is being asserted. Rather than evidencing a sustainable location, the scheme highlights the inherent unsuitability of the site in its existing context.

If the village must be extensively reengineered to function as a suburban extension of Alton in order for the development to meet sustainability tests, then the site is not sustainably located in the first place. This directly engages:

- NPPF paragraph 109 (the requirement for a *vision-led approach* to transport planning, with early integration of streets, parking and movement into the design of well-designed places, and meaningful engagement with local communities);
- NPPF paragraph 110 (active management of patterns of growth to promote walking, cycling and public transport);
- NPPF paragraph 115 (safe and suitable access);
- NPPF paragraph 129 (maintaining prevailing character and setting);
- NPPF paragraph 135 (development sympathetic to local character and history);
- JCS Policies CP1, CP2 and CP10 (settlement hierarchy compliance);
- statutory conservation area duties; and
- the LCWIP requirement for collaboration with local communities.

None of these policy tests are met. This failure is compounded by the effects of the proposed highways scheme itself, which would remove over two-thirds of existing parking provision along London Road and displace vehicles into constrained residential side streets. The resulting congestion and conflict would give rise to severe residual cumulative impacts on the local road network. In accordance with NPPF paragraph 116, these impacts provide a clear basis for refusal on highway grounds.

When this is considered alongside East Hampshire District Council's own published evidence, which previously concluded that the site is unsuitable for large-scale development (including the 2019 Site Assessment Background Paper and 2021 Strategic Site Options Paper), together with the extensive objections submitted, it is difficult to see how the principle of development can be supported. Highways impacts are not the sole constraint: the site also presents fundamental issues relating to flood risk, heritage assets, designated green space and settlement hierarchy compliance. Each of these matters independently engages policies identified in NPPF footnote 7 and provides a discrete reason for refusal. Hampshire County Council, acting as Lead Local Flood Authority, has already objected to the application on flood risk and drainage grounds.



In light of these unresolved and unresolvable issues, continued technical engagement on the design of a village-wide highway transformation would not represent a productive use of public or professional resources. However refined the highway scheme may become, it is highly unlikely to overcome the severe residual cumulative highway impacts identified under NPPF paragraph 116 and, in any event, could not remedy the underlying policy conflicts that render the site unsuitable for development in principle.

10. LCWIP Duties: The Scheme Has Not Been Developed “In Collaboration” as Required

The applicant’s submissions contend that no consultation is required on the highways scheme because consultation has already been undertaken on the LCWIP. That, however, was strategic consultation. EHDC’s own LCWIP webpage states clearly:

“Identified schemes may now be developed... in collaboration with Town and Parish Councils.”

No such collaboration has taken place.

The London Road scheme was:

- Not even mentioned by the applicant in their public consultation documents,
- Designed in private workshops,
- Presented mid-application,
- Not shared with (and is not supported by) Alton Town Council,
- Not subject to any village engagement,
- Released immediately before Christmas and consulted on at the busiest time of the year.

This is not consistent with LCWIP consultation standards or best practice for changes of such scale in a Conservation Area village. It represents a failure to comply with the LCWIP’s core principle of collaborative development and undermines the legitimacy of the proposed scheme.

11. Conclusion

The London Road highways scheme represents:



- An urban LCWIP placemaking retrofit applied to a rural Conservation Area;
- A disproportionate set of interventions intended to justify the perceived sustainability of the development, rather than address village needs;
- Significant harm to the viability of local facilities;
- An inequitable reduction in parking provision for existing residents;
- An unrealistic and unachievable modal shift assumption;
- A contradiction between claimed sustainability and actual accessibility; and
- A fundamental departure from the adopted settlement hierarchy.

The scale of highway redesign required to support this development does not demonstrate that the development is sustainable; it demonstrates that it is not. Moreover, the proposed scheme introduces new risks. The removal of over two-thirds of existing parking provision and the displacement of vehicles into constrained side streets would give rise to congestion and safety hazards that amount to severe residual cumulative impacts, contrary to NPPF paragraph 116. Experience elsewhere, including the Lenten Street scheme in Alton, shows that engineered traffic-calming interventions can fail in practice, leaving communities to absorb the consequences of flawed mitigation strategies.

Highways concerns do not arise in isolation. The site is subject to fundamental constraints relating to flood risk, heritage assets, designated green space and non-compliance with the settlement hierarchy, each of which independently engages policies identified in NPPF footnote 7 and provides a clear and separate reason for refusal. Hampshire County Council, acting as Lead Local Flood Authority, has already objected to the application on drainage and flood risk grounds.

Against that wider policy context, continued technical engagement on the design of a village-wide highway transformation cannot resolve the underlying planning objections to the proposal. However refined such a scheme may become, it would not overcome the severe residual cumulative impacts identified on highway grounds, nor would it remedy the deeper policy conflicts that render the site unsuitable for development in principle.

Holybourne deserves planning decisions that respect its character, its community and its established role within the settlement hierarchy; rather than a retrospective re-engineering of the village to make an unsuitable site appear acceptable. Upholding



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these principles is essential to maintain confidence in the integrity and purpose of the planning process.

Yours sincerely,
Holybourne Village Association