Application Reference:	EHDC-25-0748-OUT
Proposal:	Outline Planning Application with all matters reserved except access for a residential development comprising up to 156 dwellings, with supporting green infrastructure and open space including play space and associated infrastructure including Sustainable Urban Drainage System and new vehicular access from London Road
Location:	Land to the Rear Of 136-150 London Road, Holybourne, Alton, Hampshire
Parish:	Alton CP
Application Type:	Outline Planning Permission
Applicant:	Fiona Jaques
Consultation Expiry Date:	04/08/2026
Application Expiry Date:	01/10/2025
Recommendation:	**REFUSE**

Site

The site comprises a number of agricultural fields to the east of Church Lane and the north of London Road. The site gently rises from London Road to Footpaths 002/32/2 and 002/505/1 which are at the northernmost boundary of the site. The site also includes an area of land to the north of the Holybourne Sports Field. This land is separated from the rest of the site by Footpath 002/501/4.

The site has a number of mature trees along its frontage with London Road and along its eastern boundary with the Footpath. The western and northern boundaries also have mature tree cover, but this is interspersed with more open boundaries and lower hedging.

Immediately adjacent to the London Road boundary and within the site is the Holybourne Play area which has direct access onto London Road, this land makes up part of the development site. The Holybourne Sports Field is also adjacent to the site but does not make up part of the land for the development.

To the south-east of the site is the Scheduled Ancient Monument (SAM) known as Cuckoos Corner. There is no above ground archaeology to help interpret the site. The SAM encroaches onto the proposed development site.

The Holybourne Conservation Area is to the south/south- west of the site. The site shares a boundary with the Conservation Area in the north-west corner. There are a number of Listed Buildings close to the site with most of these along Church Lane and some within London Road.

Proposal

Outline Planning Application with all matters reserved except access for a residential development comprising up to 156 dwellings, with supporting green infrastructure and open space including play space and associated infrastructure including Sustainable Urban Drainage System and new vehicular access from London Road

Relevant Planning History

EHDC-25-0522-EIA - EIA Screening Opinion for up to 160 Dwellings and associated infrastructure, space for Community use, open space and landscaping. **EIA Not required**

Policies and Guidance

Joint Core Strategy

CP2 (Spatial Strategy),
CP10 (Spatial Strategy for Housing)
CP19 (Development in the Countryside)
CP14 (affordable housing for rural communities)
CP18 Provision of open space, sport & rec & built facilities
CP19 Development in the countryside
CP20 Landscape
CP21 Biodiversity
CP23 Gaps between settlements
CP24 Sustainable construction
CP25 Flood Risk
CP26 Water resources/ water quality
CP27 Pollution
CP29 Design
CP30 Historic Environment
CP31 Transport
CP32 Infrastructure

Alton Neighbourhood Plan

DE1 (Town setting and natural assets)
DE2 (Building design and town character)
HO1 (Housing mix on development sites)
HO3 (New Housing Site allocations)
TR1 (Pedestrian Networks)
TR2 (Cycle routes)
TR3 (Cycle storage and parking)

Consultations and Town/Parish Council Comments

Alton Town Council – Strong Objection

- Planning Statement states the at the NP will become out of date in November 2025 so carries limited weight.
- NP's paragraph 14 of NPPF protections still exist.
- Framework Travel Plan is not correct as it claims that the site has been draft allocated for development within the Alton NP pre- submission Plan – this plan was not progressed and allocation was not approved by Town Council.
- Main planning policy constraints for this site pertain regardless of the lack of 5 year HLS.
- Reduction of parking spaces on residents, carers, ambulances and schools and the shops are profound and negative.
- Proposals to road will displace parking
- London Road is important for the functioning of the community.
- Insufficient consideration of the impact on Eggars School
- No significant public transport service
- The council supports the comments of Cycle Alton regarding how the LCWIP ought to be used to plan for more sustainable housebuilding with better cycle routes.
- Construction traffic is a concern exacerbated by the lack of alternative access
- Modal shift aspirations in the application are extremely unrealistic and undeliverable
- Holybourne has a number of listed buildings a conservation area and an ancient monument, substantial risk of being damaged in construction process.
- Concern that the long standing experience of flooding in the village has been discounted in this application.
- Sequential test has only covered limited geography
- The flooding information does not provide a groundwater solution.
- Application appears to directly counter the recent EHDC motion on rivers endorsed by Alton Town Council.
- Water supply and sewerage is inadequate to sustain a development of this size in this location
- Incumbent of the applicant to demonstrate that proposed development can be supported by a sufficient and reliable water supply.
- Local green space has the same status as green belt.
- Playgrounds repositioning turns it into a facility for the new development and not for wider community.
- Scale of application is out of kilter with Local Plan and NPPF.
- Application should be refused.

HCC Highways – No objection subject to Conditions and Obligations

- Issues raised by the Road Safety Auditor have been adequately addressed
- Need to mitigate the impact at the London Road/Montecchio Road junction this cannot be physical capacity so accept contribution of £247,422 towards sustainable transport measures.
- £7000 towards the Andrews Endowed School Travel Plan

- HCC have identified 111 parking spaces that can be accommodated in the study area
- Proposal would improve the safety and operation of the local highway network by reducing vehicle speeds, formalising parking and create an improved environment for parking and cycling.
- Highway Authority is satisfied that the proposed scheme shown in principle for London Road is acceptable

Lead Local Flood Authority (LLFA) - No objection subject to Conditions

- Hydrogeological Assessment has been provided but this is outside remit of the LLFA – but arguments put forward are logical
- Addendum to the Drainage Strategy demonstrates that this has sufficient capacity for groundwater impacts to be incorporated within proposed site layout
- Concerns not all recommendations from the hydrogeological report have been sufficiently taken into account.
- General strategy in relation to the management of groundwater risk appears viable – not able to retain an objection on groundwater matters.

EHDC Conservation Officer – Harm less than substantial

- The Contribution of the application site to understanding the significance of the Conservation area is primarily from glimpses between houses or from rear gardens.
- Proposal would introduce a modern suburban form of development into currently open rural setting.
- Substantial planting buffers are proposed along boundaries to screen the development
- The view that the development would be harmful to the nearby heritage assets has not changed from pre-application to application stage
- Concludes that the development would result in harm but this would be less than substantial harm at a medium level but this may change dependent on final design layout.
- When less than substantial harm it would need to be weighed against the public benefits of the scheme.
- Not possible to visit a site in different seasons to assess heritage impact.
- Most affected Listed Buildings would be Manor Farm and Holybourne House but this harm would be less than substantial.

Historic England – No objection

- Investigations have been carried out and submitted in the form of a report *Interim Note on an Archaeological Trial Trench and Test Pit Evaluation: November 2025.*

- There is an overburden of plough soil of between 0.6 -0.79m which the applicants have advised that this is sufficient to ground and play equipment - no objection to relocation of proposed play area
- The evaluation also encompassed the area of the proposed attenuation pond. The area of the proposed SuDS pond has high archaeological value – location of drainage ponds is at this time indicative – content that this can be resolved at a later stage in the process.
- No objection to Kick-About area located within SAM but would not want to see lighting or fencing
- Proposed landscaping within SAM acceptability of this will need to be further explored
- Development will be harmful to setting of the monument due to visual dominance of the built form of the modern settlement – harm considered less than substantial – design of development which fronts the monument needs careful consideration.
- Expect design of the play area to be of superior quality and draw inspiration from the Roman settlement
- Additional evaluation of the area proposed by SuDs should be carried out as soon as possible and involve Historic England
- Might be an opportunity to line the edge of the monument with individual specimen trees on western boundary.
- Additional heritage benefits should be required to further mitigate harm - this could be a condition and dealt with at RM.
- Bridleway that runs through the SAM needs to be managed in a more proactive manner.

County Archaeologist - No objection subject to Conditions

- Application submitted with a Historic Environment Impact Assessment (HEIA), and its appendices, the Settings Assessment (SA), the Evaluation Report (ER), the Desk Based Assessment (DBA) and the geophysical report. I would endorse these to you.
- The development site sits adjacent to a Scheduled Monument, the small Roman settlement at Neatham, and also incorporates part of the Scheduled Monument within its eastern portion. However, the extent of development impacts will not extend into the Scheduled Monument and there will be no physical impact on the Scheduled Monument.
- Outside of SAM the site has the potential to contain other archaeological evidence. Do not agree that only archaeology within SAM would be of national significance. Archaeology outside SAM may be of national significance.
- Agree that mitigation of the archaeological remains outside the Scheduled Monument (of Roman and other periods) can be mitigated by archaeological excavation and recording secured by an archaeological condition.
- Whilst it is acknowledged that the development will not directly impact the fabric of the Scheduled Monument it will have an impact on the setting of the monument.

- The impact of development on below ground archaeological remains outside the Scheduled Monument can be addressed though archaeological recording secured by an archaeological condition.
- Recommend Conditions

Landscape Officer - Comment

- LVIA has been carried out competently and thoroughly
- Need to consider value placed on BMV agricultural land
- Revised Site Plan shows improvements in south western quarter of site, would still want to see further modification to layout in north easter and north western corners of the site
- Revised Building Heights shows an area of slightly lower heights to ridge line – recommend further reductions and variations in roof height

Ecology - No objection subject to Conditions

- Site layout is considered positive with all boundary features retained and buffered.
- Hedgerows within and along field boundaries are of clear ecological value, support a range of protected species.
- Mitigation measures will primarily involve precautionary approaches secured through a CEMP
- Statutory Biodiversity Metric demonstrates that the proposed development will deliver an onsite biodiversity net gain of 10.17% for area habitats and 26.30% for linear habitats.

EHDC Drainage - No objection subject to LLFA approval

- LLFA need to be satisfied with revised drainage proposal
- Suggest conditions
- Foul water to an existing sewer in London Road

EHDC Planning Policy and Design Officer– Comment

- Since NP was made in 2021 and is within the 5 years as set out in the NPPF and makes allocations a development that conflicts with the NP is likely to significantly and demonstrably outweigh benefits.
- Sine NP was made estimated housing needs in East Hampshire have substantially increased. In light of this Council have NP Indicative Housing Figures which identifies 196 dwellings per annum this translates into 784 dwellings over the period 2024-2028.
- Council has declared a climate emergency
- Design comments to seek agreement on quantum of development. Conclude 153 units can be accommodated

Environment Agency - Comment

- Water Supply – Located within WRZ4-W which is currently experiencing supply/demand deficit
- Water Cycle study is required and whilst this is being prepared EA have made an assessment of additional demand over the next two years.
- Demand is proportionally very small compared to overall demand for water in WRZ4-W
- Note the groundwater dynamics are being investigated and a comprehensive dataset is being collected this is important to understand the risks to groundwater
- Recommend full hydrogeological database is collected and analysed as the layout may be adjusted.
- There would be concerned regarding any altering and disruption to areas natural spring state would also need to see full accounts to climate change factors included in parameter ranges and final detailed designs
- There are groundwater and ecological concerns for particular groundwater fed ecological communities.

EHDC Environmental Health – No objection subject to Conditions

- Contamination Desk Study is acceptable – conditions suggested
- Noise Assessment submitted – Conditions suggested
- Construction Management Plan and Lighting condition suggested
- Air Quality Assessment is reliable – No objection on air quality

HCC Rights of Way - No objection subject to obligation and conditions

- Support linkages from development to existing PROW network
- Applicants WCHAR relating to PROW are broadly reflective of pre-app engagement
- Initial request of £230,010.32. £97,010.32 secured towards PROW.
- The HVA comments do not alter previous response

Officer Note – The request for £230,010.32 was not fully CIL compliant and the maintenance contribution was removed.

HCC Education – No objection

- Site would be served by St Andrews Endowed Primary School whilst this is forecast to be full – it is not full from catchment so pushback can be applied to accommodate the yield from this development
- Eggars School would serve this site and is forecast to have capacity.

NHS/ ICB – No objection subject to contribution

- Contribution of £145,427 requested
- ICB are developing projects to increase capacity as at present the practices cannot absorb the increased patients from this development.

Hampshire and IoW Fire and Rescue – No objection

- Considered a low to medium level risk of development
- Generic advice received

SSEN – No comment

- There are High Voltage overhead lines that cross the site must follow Health and Safety guidance before works commence

Thames Water – Suggested Conditions

- Not been possible to determine foul water infrastructure needs of this application – condition suggested
- Surface Water needs to be agreed – suggest condition
- Liaise with LLFA for an appropriate surface water strategy
- Developer would need to demonstrate what measures will be undertaken to minimise groundwater discharges into public sewer

Representations

1333 representations

1314 objections

19 support

Summarised Objections

<u>Highways</u>

- Development will generate a large number of additional journeys
- Traffic modelling supporting the application appears to underestimate impact of development
- Proposed access proximity to Pentons Close creates a conflict zone exacerbated by on road parking
- Highway mitigation measures do not mitigate and are disproportionate and insensitive to village character.
- London Road is often constrained by on street parking which acts to narrow the carriageway.
- Highway network in the area includes narrow country lanes and irregular minor roads.
- Traffic modelling relied upon is flawed relies on three critical assumptions that do not reflect real world observations.
- Construction traffic impacts have not been taken into account.
- The highway works to the village has been proposed to mitigate the development and does not demonstrate any village level requirement.
- New development secures policy compliant parking whilst the rest of the village have to deal with a reduction in on street parking.

- Vision led sustainable assessment is flawed relies on the assumption that 44% of all trips generated by the development will be undertaken by walking, cycling or public transport.
- On street car parking capacity would be reduced along London Road, displacing cars into the side roads.
- Concern about future viability of village shop/village pub if parking reduced.
- The proposed intervention indicates that the site is not sustainable.
- The London Road scheme had no collaboration and was presented mid application.
- The proposed scheme seeks an unrealistic modal shift.
- No evidence has been provided that behavioural change will occur.
- HCC demanded a parking assessment but received a one day survey – a survey records a condition and assessment evaluates consequences.
- Scheme relies on a number of Departures from Standard which is concerning
- Consequences of the proposed highway changes on the village clubs, schools etc have not been properly assessed.
- No proper assessment of the impact on Treloar's has occurred which has wheelchair users and vulnerable users.
- School has identified risks yet there has been no robust evidence base demonstrating that the risks are understood and mitigated.

<u>Drainage and Flooding</u>

- Sequential Test required as site at risk from groundwater flooding
- EHDC's own evidence did not put site forward for large scale development for (amongst other things) groundwater flooding, nothing has changed.
- Site has not shown it is capable of accommodating 160 dwellings due to groundwater, springs heritage and drainage constraints.
- Groundwater springs across the site are not fully understood and the springs to the east of the paddock may have implications for the access
- Proposed drainage system is not fully designed
- Surface water run off will increase due to hard surfaces resulting in a higher risk of flooding to houses opposite the site
- Applicant has underestimated the extent and volume of groundwater in both normal and extreme conditions.
- The claim that the surface water and ground water strategy will work independently of each other is unsubstantiated.
- Directs an accelerated engineered flood risk onto designated heritage asset
- Properties in Rakemakers have flooded before and this development will increase that risk.
- During heavy rain water flows along footpath on eastern boundary carrying mud and silt and blocks gutters in London Road, development will make this worse.
- Number of dwellings south of the site that would be at risk of flooding – some are already deemed a flood risk.
- Concern about flood risk on the Holy Rood Church and other listed buildings
- Increasing flood risk could lead to uninsurable and unsellable property's.

<u>Heritage</u>

- Development would harm the rural setting of the Holy Rood Church Grade II* and Manor Farmhouse Grade II
- Urbanisation of the site would lead to substantial harm to the setting of the Conservation Area and listed buildings
- Proposed highway works would lead to harm of the Conservation Area.
- Church Spire is visible within the rural landscape and this is part of its setting, development would eradicate this.
- Manor Farm, which is Grade II, is seen in context with the rural landscape it would have once farmed
- Views across the site into the countryside are important to the setting of the Conservation Area
- The presence of construction vehicles and signage for 4 years will detract from historic character.
- Harm to Holybourne House, Oak Cottages and The Forge through direct visibility to application site resulting in loss of current openness and reduced sense of rurality.
- The application does not adequately assess harm to Scheduled Ancient Monument (SAM).

<u>Landscape</u>

- Site forms part of the rural setting of Holybourne
- The proposal would cause significant harm to character and appearance of the area.
- Landscape Capacity Study indicates the landscape has a low capacity for change
- Site exceeds the small scale development EHDC's Landscape Capacity Study identifies could be provided
- Erosion of the setting of heritage assets within the wider countryside
- Significant reduction in tranquillity
- Substantially impacting upon skyline views and open views across the countryside.
- Loss of LGS with views out towards Holybourne Downs
- Replacement of LGS does not consider the role this space plays in the daily life of Holybourne

<u>Other Matters</u>

- Scale of development is more like an urban extension
- Scale is out of context with villages current size, services and infrastructure capacity
- Proposed replacement play park would be enclosed and intrinsically linked to the new development
- Village will not have the same sense of access and 'ownership' of the space as it does with existing
- Existing infrastructure is overburdened with Thames Water confirming 375 hours of sewage discharge into River Wey in last 3 years
- No meaningful assessment of whether the village can support an additional 160 homes.

- No supporting case for the behavioural change envisaged.
- Application should demonstrate air quality modelling

Summarised Support

- People need somewhere to live
- Appears that a good mix of housing would be provided.
- Green Space being provided is brilliant
- Support new homes

Planning Considerations

Principle of Development

As required by section 38(6) of the Planning and Compulsory Purchase Act 2004, applications must be determined in line with the adopted development plan for the area, unless material considerations apply. The development plan for East Hampshire District Council and this proposal comprises the East Hampshire District Local Plan: Joint Core Strategy the 'saved' policies of the 2006 East Hampshire District Local Plan: Second Review, the East Hampshire District Local Plan: Housing and Employment Allocations (2016) and the Alton Neighbourhood Plan.

The proposed development is for new residential development on a site located outside the settlement boundary of Holybourne. In policy terms, policies CP2, (Spatial Strategy), CP10 (Spatial Strategy for Housing) and CP19 (Development in the Countryside) of the East Hampshire Joint Core Strategy (JCS) are relevant in determining the acceptability in principle of this proposal.

The spatial strategy for the district is set out in Policy CP2 of the JCS which directs new development growth in the period up to 2028 to the most sustainable and accessible locations in the district in accordance with the hierarchy of settlements. Holybourne identified as a Level 4 ‘Other settlements with a settlement policy boundary’ which are settlements considered to have a more limited range of services and are suitable locations to accommodate some further small-scale development.

Policy CP10 sets out a housing specific spatial strategy, for which a minimum of 150 dwellings at other villages outside the National Park over the plan period. Sites will be identified through the Local Plan: Allocations, SDNP Local Plan or Neighbourhood Plans and settlement policy boundaries adjusted accordingly.

Policy CP10 further advises that, in addition to site allocations and development that accords with Policies CP14 (affordable housing for rural communities) and CP19 (development in the countryside), development outside settlement boundaries will only be permitted where it: meets a community need or realises local community aspirations; reinforces a settlement’s role and function; cannot be accommodated within a built up area; and has been identified in a made neighbourhood plan or has clear community support.

Policy CP19 (Development in the Countryside) of the Joint Core Strategy operates as a policy of general restraint to protect the countryside for its

own sake. The policy limits development to only that which has a genuine and proven need for a countryside location. It doesn't impose a blanket ban on development, as is evident from the dwellings that have been granted permission both at appeal and by the Council in many areas of the district outside a settlement boundary. This site lies outside the settlement boundary for Holybourne and is therefore within the countryside for the purposes of the development plan. The proposal therefore falls to be considered against the provisions of Policy CP19 of the JCS, which restricts development to that '*… with a genuine and proven need for a countryside location, such as that necessary for farming, forestry, or other rural enterprises.'*

Policy CP14 (Affordable homes for rural communities) does allow for residential development outside Settlement Policy Boundaries, but this is for a fully affordable housing scheme to meet the needs of local people. This scheme is not proposed as a rural exception site under JCS policy CP14.

The application site lies outside the Settlement Policy Boundary of Holybourne and the development is not for affordable housing to meet the needs of the local people as a rural exception site and neither is the site for an agricultural worker or has a genuine need to be located in the countryside. As such, the proposed development is contrary to Policies CP10 and CP19 of the Joint Core Strategy. The Neighbourhood Plan does allocate housing sites under HO3 but this does not allocate the application site. In such instances, where a development proposal is found to be contrary to one or more policies of a development plan the proposal may only be considered acceptable where material considerations indicate a departure from the development plan is justified.

The site is also within the area covered by Alton Neighbourhood Plan, the Alton NP allocates housing sites. The NPPF advises in National Decision Making Policy S6 that;

For development proposals involving the provision of housing, the benefits of approving development are likely to be substantially outweighed by the adverse effects where a proposal would conflict with a neighbourhood plan, provided the following apply:

a. The neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and

b. The neighbourhood plan contains allocations to meet its identified housing requirement (see policy HO2).

The Alton NP does allocate housing sites and is less than 5 years old. The application site however is not one of those allocated in the Alton NP.

The relevant policies of the Alton Neighbourhood Plan are as follows;

DE1 (Town setting and natural assets)
DE2 (Building design and town character)
HO1 (Housing mix on development sites)

HO3 (New Housing Site allocations)
TR1 (Pedestrian Networks)
TR2 (Cycle routes)
TR3 (Cycle storage and parking)

The site was included in a larger tract of land known as Land North of Holybourne and was considered in 2019 as a Large Development Site under the Local Plan Regulation 18 consultation. A large development site was defined as delivering over 600 homes. The site known as North of Holybourne was not taken forward to the Reg 18 stage as it was considered to fail on heritage impacts and groundwater flood risk. It was considered that the constraints these sites proposed *were judged to have constraints for large-scale development with limited or no obvious scope for the mitigation of adverse impacts, without reducing the scale of the site to less than is required for a 'large development site'.* Therefore, the site was deemed to have 'failed' stage 2 of the process, the Large Development Site consultation concluded that *the sites that have failed the site assessment process are not being rejected from any further consideration through the plan-making process. The results do not mean that these sites, taken as a whole or just small parts of them, would be unsuitable for development. They only mean that there appear to be significant constraints which make their suitability for large scale development very doubtful at the present time.*

The Holybourne Village Assocaition have made representations that this site has previously been considered for large scale development and was not considered suitable this still applies. The site is now 156 houses which is not considered large development and as stated above, failure to be included in the Large Sites Consultation did not mean the site was considered unsuitable for development just that the constraints made them unsuitable to be considered as a large development site.

Prior to the cessation of the preparation of the Local Plan at Reg 18 stage, Holybourne was reconsidered as a Tier 1 settlement alongside its larger neighbour Alton. Tier 1 settlements were described in the Reg 18 as larger towns and areas that fulfil the most functions. Reg 18 Policy S2 provided for a revised and updated settlement hierarchy informed by re-assessment of the 2104 hierarchy and took account of accessibility to key services and facilities through walking and cycling as established by the LPA's 2023 Accessibility Study. It is accepted that Holybourne is not a large town but its proximity and links to Alton do mean that between the two settlements a number of functions are fulfilled. It is accepted that no weight is attached to Holybourne being moved to a Tier 1.

<u>Emerging Local Plan</u>

On 28th May 2026, East Hampshire District Council resolved to cease work under the 'legacy' plan-making system in order to re-align its local plan-making activities with the emergence of the new planning system for England. These changes to plan-making mean that emerging policies and proposals from the Draft East Hampshire Local Plan 2024 are no longer being progressed by the Council and are thus immaterial to decision-taking for planning applications. In accordance with Government deadlines, the Council will publish a timetable for a new local plan under the new planning system by the end of December 2026.

Five-year housing land supply

The revised NPPF was published in August 2026. The National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPA) to update and identify annually a supply of deliverable sites for the next five years. EHDC has now published the East Hampshire Five-Year Housing Land Supply Position Statement which advises that EHDC only has 2.9 years supply of housing land.

NPPF 2026

A revised NPPF was published in August 2026 and this sets out a number of National Decision Making Policies. National Decision Making Policy S5 (j) which states:

Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test), and where the development would:

i. Be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or
ii. Comprise major development for freight and logistics purposes which accords with policy E3.

Should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects when assessed against the national decision making policies within the NPPF.

The effect of this policy is to 'tilt' the balance in favour of development.

Policy S5(5) does not apply to Local Green Space (LGS). The Holybourne Play Park is designated LGS and as such this area of the application site should be considered against policies HC8, GB6, GB7 and/or GB8.

National Decision Making Policy S6 adds that with regard to Neighbourhood Plans

For development proposals involving the provision of housing, the benefits of approving development are likely to be substantially outweighed by the adverse effects where a proposal would conflict with a neighbourhood plan, provided the following apply:

a. The neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and

b. The neighbourhood plan contains allocations to meet its identified housing requirement (see policy HO2).

Across the Alton NP period of 2011 to 2028, 877 houses were allocated, the modified Alton NP was made on 11 November 2021 and since this time the estimated housing needs for East Hampshire have substantially increased as a result of changes to the Government's standard method for calculating housing needs. The Council has produced a document entitled Neighbourhood Plans – Indicative Housing Figures (January 2026), which identifies an indicative figure of 190 dwellings per annum for Alton from 2024 to 2028 the end of the NP plan period which equates to 760 dwellings. This figure would be above and beyond the NP allocations and provide an indication of additional housing need.

It is acknowledged that Policy S6 of the NPPF affords enhanced protection to qualifying neighbourhood plans and indicates that conflict with such plans is likely to give rise to adverse impacts that substantially outweigh the benefits of a proposal. However, this is not a statutory presumption against development, nor does the NPPF define the level of benefit necessary to justify a decision contrary to neighbourhood plan policies. The significance of the conflict and the weight to be afforded to any benefits are therefore matters for the decision-maker's planning judgement.

Holybourne is a Tier 4 settlement under the current JCS of 2014 meaning it is considered suitable for small scale local development. The village has no housing allocations through either the Alton NP which does allocate housing sites or through the JCS (both addressing needs to 2028). It is considered a rural village and the proposed site is outside of the settlement boundary. These factors carry weight in the decision making process.

The JCS policies are now 12 years old and may not reflect current national planning policy with the latter set out in the NPPF updated in August 2026. Development proposals should be consistent with the relevant development plan and national decision making policies.

The NPPF sets out in National Decision Making Policy S5 the principle of dealing with development outside settlements. It states that only certain forms of development should be approved as set out in the policy and only then when the benefits of doing so are not substantially outweighed by any adverse effects of doing so. The key consideration of Policy S5 would be S5 (1)(j) whether the development would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below

75% in the most recent Housing Delivery Test (HDT)), and where the development would be physically well-related to an existing settlement and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.

Despite scoring 79% in the most recent HDT, East Hampshire District Council cannot demonstrate a 5 year Housing Land Supply with the current figure being 2.9 years which evidences an unmet need in terms of not meeting the housing requirements for the area.

The site lies immediately adjacent to the existing settlement policy boundary and represents a logical extension to the built form of Holybourne. It is well related to the settlement both in terms of functionally and spatially, and it is also visually well linked to the existing pattern of development. Policy S5 requires development to be of a scale that can be accommodated only in terms of existing and proposed infrastructure. The application site is located within a village that is closely related to Alton a larger Tier 1 settlement, benefitting from good road connections and opportunities for walking and wheeling between the two communities. The sustainability of the location will further be enhanced through the delivery of the proposed infrastructure improvements.

National Decision Making Policy TR3 of the NPPF requires development to be located in sustainable locations. TR3 (1)(a) states *Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are sustainable (or which can be made so, taking into account planned improvements, including any provided for as part of the development itself). This means the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical*

The HVA make reference to the NPPF definition of 'reasonable walking distance' and its relevance to what makes a sustainable settlement, The NPPF definition of Reasonable Walking Distance is

For the purpose of policies S5, L3, GB7 (relating to land around well-connected stations), this should be considered to be around 800 metres, or around 10 minutes' walk time if topography, route availability and quality or physical barriers would prevent or discourage walking from up to 800 metres away. For the purpose of policy HC5 (hot food takeaways) it should be considered to be around 400 metres, or around five minutes' walk time if topography, route availability and quality or physical barriers would prevent or discourage walking up to 400 metres. Where a reasonable walking distance is required to be calculated when applying policies S5(1)(h), L3(2)(c) and GB7(1)(h), and only part of the site falls within the reasonable walking distance, those sub-paragraphs of policies S5, L3 and GB7 only apply to the area of the site within that reasonable walking distance.

When the definition of Reasonable Walking Distance is relevant within the NPPF it makes it explicitly clear by stating it is applying the definition in the glossary. The above definition also sets out when it should be used. In relation to S5 it refers to

land around well connected stations – this does not apply to the application site. The glossary definition also applies to S5 (1)(h) again this applies to development within reasonable walking distance of a well connected station this does not apply to this application.

The HVA argue that the NPPF has set out what is considered a reasonable walking distance and that this should be applied more widely. The LPA would argue that the introduction of the definition of reasonable walking distance was more to support the Government's drive to increase housebuilding around well connected train stations than be a blanket definition on walking distances. This approach was supported in a recent Appeal Decision 6008238 -Land North of A507, West of A10, Buntingford, SG9 9ER for East Hertfordshire District Council which referred to Manual for Streets accepting that a walking distance of under 2kms was sufficient to encourage travel by foot.

In rural authorities like East Hampshire sustainability in the villages and towns will be different than large urban centres and it is unlikely that one settlement would be able to provide all the needs of its residents. Whilst the idea of walkable neighbourhoods are recognised, in rural locations they are more difficult to achieve as facilities are more dispersed, however in rural locations people are more likely to be accepting of a longer walking distance between facilities.

Whilst Holybourne is a rural village it does have a shop, public house, theatre, recreational facilities, village hall and a primary school making it well served by facilities. The village is also located close to the larger market town of Alton. Whilst they remain separate settlements it would be disingenuous to not recognise that people from Alton utilise services in Holybourne and vice versa. Alton as a Tier 1 settlement does have a higher level of sustainability in terms of access to jobs, services and recreation.

It is accepted that Alton is beyond the NPPF definition of a reasonable walking distance of 800 metres. However, the walking distance between the Montecchio junction and the A31 bridge at the eastern end of the village is 0.88 miles which is over the 800m walkable distance but would not necessarily mean if you live in the village that you would use your car for the journey. Whilst the walk to the centre of Alton from the Montecchio junction of 1.12 miles is probably further than most people would walk, improved infrastructure and cycling routes would offer alternatives to the people of Holybourne to access services in the neighbouring settlement without using the car.

Sustainability is multi stranded and as the NPPF sets out there is an economic, social and environmental objective to sustainability. For rural settlements like Holybourne development needs to support strong and vibrant communities and provide a range of homes to support current and future generations. Reducing the reliance on the private car is an important strand of what makes a site sustainable and as discussed above the development affords opportunities to improve walking and cycling which in this location are probably the most realistic alternatives to the private car. It is considered that when considering sustainability in a rural village there has to be some acknowledgement of that villages uniqueness and that there

needs to be a nuanced/balanced approach as opposed to a strict adherence to an 800 metre walking distance.

The site is located adjacent to Holybourne and is accessible to a range of services and facilities. As such, the proposal is considered to align with the objectives of National Decision Making Policies S5 (1)(j) and TR3 (1)(a) in directing development to sustainable locations. This consideration attracts significant weight in favour of the proposal. However, this support does not remove the need to assess the proposal against the development plan as a whole, including relevant policies of the Alton Neighbourhood Plan, nor does it outweigh the other adverse impacts identified within this report.

Impact on the character and appearance of the area

Local Green Space (LGS)

The Holybourne Play Area which is within the application site is designated a Local Green Space by the Neighbourhood Plan. In the supporting text to Policy CH5 it states that *" Holybourne Play Area is the only publicly accessible recreational area near the centre of the village from which to enjoy nature and admire the outstanding views northwards to Holybourne Down, the nearest alternative play area being a mile away."*

Policy CH5 does not provide guidance on approaching development and protection of the LGS. National Decision Making Policy HC8 of the revised NPPF August 2026 advises that *Development proposals for land which has been designated as Local Green Space should be determined in a manner consistent with the relevant national decision-making policies for land in the Green Belt, excluding provisions relating to grey belt and previously developed land*.

National Decision Making Policy GB7 advises on development that is not inappropriate within the Green Belt (GB) which includes residential or mixed use development provided it would comply with Policy GB8.

GB8 refers to the Golden Rules of developing on Green Belt Land which states:

a. Affordable housing which reflects either:

i. Development plan policy requirements for major development on land within or released from the Green Belt (as established under policy HO5(1)(a)(ii)); or
ii. Until such policies are in place, a contribution which is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of a 50%. In the absence of a preexisting requirement for affordable housing, a 50% affordable housing contribution should apply by default.

b. Necessary improvements to local or national infrastructure; and

c. The provision of new green space, or improvements to existing green space, which is accessible to the public. New residents should be able to access good quality green spaces within a short walk of their homes, whether through on-site provision or through access to offsite spaces. This provision should:

i. Make a positive contribution to the landscape setting of the development;
ii. Support nature recovery; and
iii. Meet local standards for green space provision where these exist in the development plan. Where no locally-specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England's standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.

The proposal does not fully accord with the affordable housing element of Policy GB8. Whilst the development would provide 40% affordable housing, together with infrastructure improvements and substantial public green space provision, this falls below the 50% level which would apply under the Golden Rules approach where no pre-existing Green Belt affordable housing requirement exists. Notwithstanding this shortfall, the proposal would deliver a substantial level of affordable housing in line with EHDC's policy for many market-led developments, provide new and enhanced publicly accessible green space, secure necessary infrastructure improvements, support nature recovery and accord with the wider objectives underpinning the Golden Rules. The proposal therefore reflects the majority of the outcomes sought by Policy GB8, albeit without fully satisfying the affordable housing requirement.

Whilst the proposal would not fully satisfy all elements of Policy GB8, the extent and significance of that conflict must be assessed alongside the other benefits of the scheme and the specific circumstances of the Local Green Space designation. The HVA state that the Local Green Space was designated through the NP due to it being *the only publicly accessible recreational area near the centre of the village from which to enjoy nature and admire the outstanding views northwards to Holybourne Downs.*

As stated above the NPPF sets out those circumstances where development in the GB is acceptable and this development is considered against that policy. The LGS is located within a wider unprotected landscape in that the landscape is not afforded the same protection as the LGS. Development on the land surrounding the LGS is not considered against the Green Belt policies as it does not hold that status and neither is it LGS. As in this case a scheme for housing has been proposed consideration of the wider site for housing as well as the impact on the LGS would need to be part of the wider planning balance. If the site were to be developed whilst leaving the LGS in situ some of the reasoning for designating the space would be lost in that the open nature and views northwards would be altered.

Whilst the views themselves are not separately designated, they form part of the value and significance of the designated LGS as identified within the Alton Neighbourhood Plan. In particular, the Neighbourhood Plan identifies the role of the site in providing publicly accessible open space from which views towards Holybourne Down can be experienced. However, the extent of harm must be assessed in the context of the wider site circumstances. The open views identified within the Neighbourhood Plan extend beyond the designated LGS itself and across adjoining land which does not benefit from equivalent policy protection.
Consequently, whilst the proposal would result in the loss of the designated Local Green Space and harm to attributes contributing to its significance, the development would also deliver replacement and enhanced public open space, biodiversity gains, infrastructure improvements and 40% affordable housing. These are material considerations attracting substantial weight in the planning balance.
Policy CP17 of the JCS also advises that where there is a loss of sport, recreation or play facility through development this would be permitted where alternative facilities of equal or better quality and quantity can be provided in an equally accessible location

The proposed relocated play area and kickabout area would be significantly larger and would still be located in the centre of the village and be publicly accessible in accordance with the criteria for LGS. . The proposal would also provide replacement recreational facilities of improved quality and quantity in accordance with the objectives of Policy CP17 of the JCS.

It is recognised that the LGS designation relates not only to the provision of recreational facilities but also to the contribution the space makes to the character of Holybourne, its openness and its value as an accessible community space. These considerations have been taken into account in assessing the proposal.

It is recognised, however, that the Local Green Space designation relates not only to the provision of recreational facilities but also to the contribution the site makes to the character of Holybourne, its openness, recreational function and value as an accessible community space from which views towards Holybourne Down can be experienced. Whilst the replacement facilities would address the recreational aspects of the designation, they would not fully mitigate the loss of those wider attributes. These matters have therefore been taken into account in assessing the overall impact of the proposal and in undertaking the planning balance.
On balance it is considered that the proposal does reflect GB policy as set out in the NPPF and whilst it does not fully meet the GB Golden Rules it does deliver benefits to the local community. The larger and enhanced recreation space would remain publicly accessible, would continue to be centrally located within Holybourne and would retain views towards the Scheduled Monument. The replacement provision would accord with Policy CP17 of the JCS and forms an important consideration in the assessment of the proposal. The proposal must be considered in the context of both the LGS designation and the Council's current housing land supply position, together with all other material planning considerations.

Heritage

Policy CP30 of the JCS requires development to conserve and where possible, enhance the District's historic environment. Saved Policy HE8 requires development outside of a Conservation Area to not harm its setting or views into or out of it. Saved Policy HE12 requires development to not harm the setting of a Listed Building. Saved Policy HE17 does not allow development to adversely affect important archaeological sites or monuments.

National Decision Making Policy HE4 of the revised NPPF August 2026 advises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.

The site is adjacent to the Holybourne Conservation Area and also contains part of the Scheduled Ancient Monument known as Cuckoo's Corner Roman Site.

<u>Impact on the Conservation Area and neighbouring listed buildings.</u>

Holybourne Conservation Area was designated in 1977. The Conservation Area Appraisal advises the Conservation Area is characterised by three distinct features:

- The winding linear main street (London Road) with cottages and houses of traditional local materials
- The narrow lanes leading off London Road with flint brick and stone walls tight against the lane edge; and
- The mature trees which provide a setting to frame the historic buildings.

The Conservation Area Appraisal requires updating and as such it is also worth referring to the Neighbourhood Character Study. In this document the site falls into the area known as Eastern Holybourne and advises that to accommodate future development with regard to heritage it would be beneficial to;

- Ensure that new development within or close to the Conservation Area complements the historic character.
- Conserve the setting of the village and views to the church spire.

The application site is at present open fields and provides a rural setting to the Conservation Area along this eastern boundary. The site shares a boundary with the Conservation Area in the north west corner for approximately 87 metres. The site then has a buffer between the Conservation Area in the form of fields before it again abuts the Conservation Area along the eastern boundary of the Play Area. The boundary with London Road does not abut the Conservation Area but is opposite it. It is accepted that the built form would urbanise this setting.

There are a number of listed buildings in the area and these are located along Church Lane and with some along the London Road. Most of the Listed Buildings do not share a boundary with the site and would be separated from the site by other

development, landscaping and fields. Manor Farm House does share a residential boundary with the site albeit with a narrow footpath in between the two sites. The Applicants Heritage Impact Assessment acknowledges the nearby listed buildings and concludes that the development has the potential to change the setting of the identified assets. The immediate setting of these listed buildings would be little altered by the proposal, but it is accepted that there would be harm to the wider setting in terms of the loss of the open fields. In the case of Manor Farm this would remove some of the rural context in which the house would have been constructed.

Third parties have raised concern regarding the impact on the setting of the Holy Rood Church which has a prominent tower. The immediate setting of the church would be unaffected by the proposal but it is accepted that its wider prominence in the landscape would be impacted. Views of this tower are visible from the application site and the surrounding footpaths. The church spire would be the only part of the church visible from the site, it is at its most prominent in the northern part of the site where there are clearer views of the spire particularly in Winter. This visibility is reflected in the Parameter Plans which show a corridor of no built development to maintain views of the church spire. Third parties have indicated its visibility from the playground on London Road and whilst it may be visible from this location it would be seen in context with intervening vegetation reducing its prominence. Whilst this would change in the Winter months where it would be expected to have greater prominence the spire would still be seen against the winter foliage.

The Conservation Officer has concluded that the impact on the Holybourne Conservation Area and the Listed Buildings would be less than substantial which accepts that there is harm caused by the development but this would need to be weighed against the public benefits of the development.

Scheduled Ancient Monument (SAM)

Part of the site is also within a Scheduled Ancient Monument (SAM) known as Cuckoo's Corner. This was a site of an extensive Roman Settlement and was located to the north of two major roads, one between Silchester and Chichester and the other between Winchester to London. Excavations have found evidence of a large stopping area, timber buildings, pits and ditches. Substantial pottery and coin assemblage were also found. As burials could not take place within the bounds of the town defences the area outside towns became extensive burial grounds.

Therefore, the immediate environs of walled towns and settlements are of high archaeological significance. The development lies to the west of the scheduled monument with the play area, kickabout area and some tree planting all being within the designated area.

An archaeological evaluation has been carried out in the location of the proposed play area where minimal evidence of the Roman settlement was found and this corresponds to an evaluation of the site in 2020. It was also established that overburden of the plough soil was between 0.6 -0.79, this is sufficient to ground any play equipment which would minimise harm as this would not impact undisturbed and unidentified archaeological remains. Historic England also advised that they

would expect the play experience to be of superior quality and draw inspiration from the Roman Settlement, this would create a landscape appropriate play area that would contribute to a wider understanding of the landscape. Based on this Historic England raise no objection to the play area being located within the Scheduled Monument.

The proposed attenuation pond on the indicative plan is outside of the Scheduled Monument, notwithstanding this the geophysical survey indicates that the archaeological remains here may have potential. Historic England is satisfied that as layout is a Reserved Matter this can be dealt with at this point.

The proposed kick about area is also located within the Scheduled Monument and Historic England raise no objection provided there is no fencing or lighting. Any new planting within the Scheduled Monument will need to be considered at Reserved Matters.

The built form would have an impact on the setting of the Scheduled Monument which will come from the visual dominance of the built form of the modern settlement. There will also be harm to erosion of the open and more rural setting. Historic England conclude that the harm is less than substantial.

Historic England accept that there are some heritage benefits in that the applicant could engage the local community in the history of the site. An existing bridleway that passes through the scheduled monument could be better managed in a more proactive manner to limit the impact on archaeological remains.

Third parties have raised concern about the impact of the development on the setting of the SAM. It is argued that the open setting of the monument within the landscape helps with the understanding of why the settlement was in this location. The HVA argue that the open landscape to the north of the SAM "*..makes a positive contribution to understanding, appreciating and experiencing the historic and cultural significance of this important designated heritage asset, including rationale for its chosen location and subsequent growth and importance.*

Due to the lack of above ground features the location of the SAM is difficult to ascertain in the wider landscape as its boundaries and presence within that landscape are not clearly defined. Without knowledge of the Roman Settlement the landscape does not provide strong references to its presence so much so that it lay undiscovered for centuries, with it being discovered in the 1960's when the Alton bypass was constructed. However, it is accepted that its presence is now known and it is protected. With knowledge of its presence the landscape provides a few clues in that the alignment of the Roman Roads is preserved in the route of the London Road and also the footpath along the eastern boundary which aligns with the Roman Silchester to Chichester Road. These visual clues are important to the SAM setting and they would be preserved and unaffected by the development.

Historic England in their response are seeking the protection of below ground archaeology and that built form does not encroach upon the SAM itself. It is accepted that play areas will encroach within the space. The HVA have raised concern that children playing on the SAM unsupervised could risk trivialising and

damaging the Monument but as there is no above ground archaeology the SAM is already used as a cricket ground and sports field by the wider Holybourne community and this has been the case for a number of years and the proposed play areas are an extension of that recreational use.

It is considered that there is some harm to heritage assets of the SAM, Listed Buildings and the Conservation Area through impact on their setting and this is considered less than substantial. The development is therefore not considered to accord with policies CP30, HE8, HE12 and HE17 of the JCS and Chapter 20 of the NPPF.

Landscape

Policy CP20 of the JCS requires proposals to conserve and enhance local distinctiveness and which states proposals are required to protect and enhance settlements in the wider landscape and land at the urban edge. Policy CP19 of the Joint Core Strategy operates as a policy of general restraint to protect the countryside for its own sake. The Neighbourhood Character Study of 2018 also advises that development should;

- Conserve the green space along London Road and the outlook to the countryside (with a view corridor if land developed).
- Conserve vegetation and tree cover. Identify and protect trees at risk.
- Conserve Grade 2 Agricultural land.
- Ensure the scale of development avoids exposed rooflines against the skyline. Establish buffer planting to contain development, particularly around high points.

<u>Best and Most Versatile Agricultural Land</u>

Agricultural land is classified from Grades 1- 5

The highest grade goes to land that:

- gives a high yield or output
- has the widest range and versatility of use
- produces the most consistent yield
- requires less input

BMV agricultural land is graded 1 to 3a

The site is 16.05ha and comprises Grade 2 and Grade 3 land. Grade 3a land accounts for 12.7ha of the site and Grade 2 Land accounts for 2.9ha of the site. The LPA is required to consult with Natural England on sites that are not in accordance with the approved development plan **and** where more than 20ha of BMV is to be lost. This site does not meet both those criteria and therefore whilst Natural England were consulted on this application they did not comment on the loss of BMV agricultural land. The loss of BMV agricultural land will be accounted for in the planning balance.

Grade 2 land is considered ‘very good’ with minor limitations that affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown.

Grade 3a is considered good agricultural land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals.

The Landscape Character Assessment 2024 identifies the site within the Northern Wey Valley Landscape Character Area. The LCA advises that any development in this LCA should be landscape led with development carefully planned with biodiversity considered from the outset. There is a need to conserve the setting of villages and key views towards and from them and landmark features such as church towers/spires. The Landscape Capacity Study 2018 (LCS) concludes that the area in which the development is located has medium/low capacity. The LCS advises that landscapes with medium to low capacity can allow for development but *only in limited situations, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas*.

Concern has been expressed by third parties as to the impact on the landscape and local residents enjoyment of that landscape. The site has a number of footpaths around it and the footpath to the north is part of the St Swithuns Way and affords views across the site towards London Road, the site also allows views out towards the landscape from London Road. Third parties argue that 156 dwellings is not a small amount of development as envisaged by the LCS and the LPA would acknowledge that this is probably a higher number of dwellings than the LCS was suggesting. Notwithstanding this as the application has been submitted consideration needs to be given to whether harm is caused by the development in landscape terms and what has or can be done to mitigate any harm. The LCS will be a material consideration in this assessment. It is accepted that the development of any land that is currently undeveloped will have an impact on the landscape of an area. In an area that is more sensitive to change this would be felt more acutely

The application has been submitted with a Landscape and Visual Impact Assessment (LVIA). The Landscape Officer is satisfied that this has been carried out competently and thoroughly. They recognise that the views from the north and north east are sensitive where the experience of the countryside and seeing the settlement within the countryside are important. They would also agree that the main impacts of the development are felt on the site itself.

The site is not within any protected landscape but it is accepted that the wider landscape is sensitive to change and that the LCS advises that only small scale development is suitable. The site was also included in the Council’s Land Availability Assessment 2025 albeit for a smaller number of dwellings (99). Residential development borders the site from the west and south, to the west is the SAM, PROW and tree belts surrounding open land. The main impacts of the development would be significant but localised to the immediate footpath and roads that adjoin the site. More distant views would be seen in context with the wider built form of the village. Notwithstanding this the Landscape Officer has acknowledged that moderate adverse impacts in Year 15 would be felt on the site itself and some wider

viewpoints particularly those to the north and northeast would experience minor to moderate adverse views in Year 15.

The Landscape Officer has concluded that the landscape mitigation, architectural detailing and typologies will be a key to the integration of the development. As this application is in Outline these issues would be resolved at Reserved Matters stage. It is likely that even with mitigating effect the LVIA indicates a moderate adverse impact. The proposal does not accord with policies CP19 and CP20 of the JCS.

Drainage and Flood Risk

Policy CP25 of the JCS deals with Flood Risk and Surface Water Drainage and requires development to have no net increase in surface water run-off and if within a flood risk area to meet certain criteria. Where required Policy CP25 also requires development to meet the Sequential and Exception Tests. The NPPF in Chapter 18 seeks to minimise risks to development arising from all sources of flooding. The site is located entirely within Flood Zone 1 but is known to be in an area prone to groundwater flooding.

The application was submitted with a Flood Risk Assessment, a Drainage Strategy, and Flood Risk Addendum and a Hydrogeological Report.

Flood Risk

A site specific Flood Risk Assessment (FRA) has been submitted with the application and this looked at all sources of flooding. The FRA advises that the site is vulnerable to groundwater flooding due to the presence of a groundwater spring within the site. The groundwater does rise to the surface and whilst most infiltrates back into the ground some will sit at surface of the site, it then flows across the site and discharges into a stream that flows across the adjacent site to the south.

The FRA makes the following recommendations:

- No dwellings or private amenity space within areas at risk of ground water flooding
- The formation of ‘spring garden’ to continue to hold emergent ground water and allow it to permeate back into the ground
- The provision of low flow conveyance swale along the line of the line of the existing flow feature. Providing twice the flow rate capacity than has been measured on site.
- The inclusion of attenuation storage along the southern boundary of the site, to allow the ground water at surface to be held and discharged. The volume of storage provided (400m3) is twice the maximum of volume of water that measured on site during the surveying undertaken in winter 2025/26.

During construction consideration can also be given to foundation construction which allows groundwater to continue to flow and if required moderate ground raising with permeable materials.

The site also has a small area of surface water flooding, the indicative layout shows that these areas have been kept free from development.

Surface Water Disposal

For surface water discharge, the drainage hierarchy notes the following list of drainage options in order of preference:

1 Infiltration to ground
2 Discharge to a watercourse
3 Discharge to a surface water sewer
4 Discharge to a foul water sewer

Soakage tests were carried out on the site and indicated that infiltration is a viable drainage solution. However, groundwater monitoring completed in March 2025 identified a high groundwater table in parts of the site and as such infiltration would not be feasible.

The proposed drainage strategy relies on attenuation, with the site being split into five catchments with an attenuation basin serving each catchment. There will be restricted discharge into an existing Thames Water surface water drain within Pentons Close. A spring fed ditch is proposed to be diverted into the proposed surface water network to mitigate flooding downstream.

The proposed Drainage Strategy is considered acceptable by the LLFA. However they caveat that this is based on the information on groundwater being correct, this is discussed further below.

Groundwater Drainage Strategy

An addendum to the Drainage Strategy by Burrows Graham dated the 21st May 2026 was submitted to set out the approach to ground water flood risk and drainage strategy. A Hydrogeological Report has been undertaken by H Fraser Consulting and this report made the following recommendations for the drainage strategy;

1) The drainage strategy should mimic natural processes as far as possible, allowing for
a. Storage of groundwater in the gravels
b. A route for water to return to the gravel aquifer as groundwater levels subside
c. Drainage around subsurface structures such as foundations, so that flow through the gravels is maintained

d. Conveyance of water off-site via the surface water system
e. Maintaining field drainage across the wider site to deal with minor seepages of groundwater in wet conditions

2) The drainage strategy should allow groundwater to issue to surface at the spring location and find its level, and flow naturally to the southern boundary.
3) In development areas around the edges of the saturated zone, ground levels could be raised slightly with permeable materials, to allow groundwater to flow below the development and prevent flooding.
4) Further investigation will be required to provide more detailed information for detailed drainage design.

The site is as set out in the FRA vulnerable to groundwater flooding.

The application was submitted with a site specific flood risk assessment. The indicative plan also shows that the area of known saturated land and the known groundwater flow route has been kept clear of built development. Groundwater flows off the site to the south along its current path. The indicative plan shows an internal road in conflict with the known flow route of groundwater leaving the site. Plans submitted with the application show that the groundwater is culverted under the road to allow safe use of the road.

It needs to be noted that the Hydrogeological Survey and the Sequential Test were submitted at the same time and before the independent outcome of the assessment of the Hydrogeological Survey were known.

The Applicants Drainage Strategy was informed by a Hydrogeological Survey as the site is prone to groundwater flooding. The LLFA advised that based on the information in the Hydrogeological Survey and Drainage Strategy Addendum they could not sustain a continuing objection to groundwater issues but caveated that whilst the findings of the Hydrogeological Survey were logical, groundwater is beyond their remit. They also raised queries on the drainage strategy and the findings of the hydrogeological report and requested a commitment to further investigation as recommended in the Applicants Hydrogeological Report. EHDC therefore commissioned an independent Hydrogeologist to assess the Applicants Hydrogeology Report.

The East Hants Hydrogeological Report (EHHR) raised concern about the Applicants Hydrogeological Report and concluded that;

1. There should be continued monitoring through at least one complete hydrological year and the following winter high, with comparison to long-term Chalk levels and rainfall. A longer record may be required if the next winter is not representative of elevated conditions;
2. A robust spring monitoring arrangement should be installed to capture seasonal flow results;

3. The surface water and groundwater catchments supplying the spring must be defined as the current assessment does not delineate either catchment;
4. Investigate existing land drains, including the drain observed discharging to Cuckoo's Corner Spring and establish whether similar drains influence the paddock spring or convey water off site;
5. Assess the controls on migration of the spring lines and/or activation of historic spring lines through SuDS. What is the risk and has it been considered? I have concerns that changes in recharge patterns through the implementation of SuDS (point source discharge versus existing diffuse recharge) may influence the spring flow rates and locations. This does not appear to have been considered in the Hydrogeological Assessment report to date;
6. There are several water features in the area that have not been assessed, albeit beyond the red line boundary, for example, Springfield Cottage on London Road has a water feature in its grounds on a similar elevation to the Paddock Spring. As outlined in point 5 above, by changing the recharge mechanisms on site there is the possibility of changing the discharge dynamics (spring flows) in the vicinity. This could have potential flooding implications off-site and needs consideration.

The absence of a longer-term evidence base also limits the ability to properly assess future groundwater responses and the effectiveness of the proposed mitigation measures over the lifetime of the development, having regard to climate change. This is particularly relevant given the acknowledged uncertainty regarding groundwater flow paths, recharge mechanisms and spring behaviour across and beyond the site.

Consequently, the Report advised a low to medium confidence in the Applicant's Hydrogeological Report and therefore by default the Applicant's FRA and Drainage Strategy and assessed further work was needed to fully understand the groundwater risk to the site. This is supported by third parties who have made representations to the application that not all groundwater risks were captured by the Applicants Hydrogeological Report.

The findings of the independent Hydrogeological Assessment indicate that there remains insufficient evidence to fully understand the groundwater regime affecting the site, including the extent, frequency and behaviour of groundwater emergence and flow paths, and how these may be affected by the proposed development. As a result, the Council cannot reach a degree of confidence, based on the evidence before it, that the submitted mitigation strategy would adequately manage groundwater risk for the lifetime of the development..
Subsequently without understanding this, it is difficult to know if/what mitigation would be required to address the groundwater flood risk, this could impact the drainage strategy or the amount of land available for development. Consequently, the LPA cannot be confident that the proposed Drainage Strategy will adequately address the potential flood risk from groundwater flooding or that proposed form of

development can be accommodated on the site without increasing flood risk elsewhere on or off the site.

The Planning Policy Guidance Note (PPG), Flood and Coastal Change advises that Where a site-specific flood risk assessment demonstrates clearly that the proposed l*ayout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.*

It is considered that whilst there was a site specific FRA submitted with the application it does not demonstrate at this time that occupiers of the development would remain safe from future and current flooding risks.

Sequential Test

The Sequential Test directs development to areas with the lowest flood risk from any source, ensuring only higher risk sites are used when no suitable alternative exists. It can be applied at a strategic level or at an application level.

National Decision Making Policy F5 of the NPPF deals with the sequential test and advises;

The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, other than for:

a. Sites allocated in the development plan which were subject to the sequential test during plan preparation;
b. Sites where a site-specific flood risk assessment demonstrates clearly that:

i. No built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk); or
ii. Where the site would be at risk of surface water flooding only, the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere in accordance with policy F7.

The Applicant has provided a Sequential Test which was submitted for robustness in that, at the time of submitting the Sequential Test it was considered by the Applicants that the site specific FRA did meet the requirements of National Decision Making Policy F5 of the NPPF. This has subsequently found to not be correct.

Consideration of the Sequential Test is as follows. Policy F5 of the NPPF advises that for the purposes of a Sequential Test new development should be steered towards *" areas with the lowest risk of flooding from any source. Where the test applies, development proposals should not be located in areas at risk of flooding where alternative sites, appropriate for the development, are reasonably available in areas with a lower risk of flooding. The area to which the test is applied should not be greater than the anticipated catchment of the development in terms of its likely occupiers or users."*

Due to the nature of development in East Hampshire which is distinct market towns in a rural landscape the search area of Holybourne and Alton is considered appropriate. The proposed development seeks to boost housing supply in the area. The HVA have raised concern about the search area of the Sequential Test. They argue that restricting the search to Alton and Holybourne is incorrect as the proposal is submitted as a response to EHDC's housing land supply shortfall which affects the whole district. They also criticise restricting the search to similar size sites and only those that can accommodate a similar size development. They also argue that this approach does not consider the delivery of housing through a number of smaller sites.

Policy F5 of the NPPF advises that when considering alternative sites they need to be "appropriate for the development" this would indicate that they should be of a size to accommodate the 156 houses. It also states that the area to which the test is applied should not be greater than the anticipated catchment of the development in terms of its future occupiers. Restricting the search to Holybourne/Alton would not be unreasonable as this would be the anticipated catchment of the future occupiers.

The Applicants Sequential Test utilised sites that had been put forward under the Council's Land Availability Assessment (LAA) and looked at sites that were large enough to accommodate 150+ dwellings. The PPG on Flood Risk and Coastal Change advises that within the area of search the applicant would need to identify whether there are *"..any other 'reasonably available' sites within the area of search, that have not already been identified by the planning authority in site allocations or relevant housing and/or economic land availability assessments, such as sites currently available on the open market."*

The Applicants Sequential Test does not do this as it focuses on only those sites within the Council's Land Availability Assessment that were of a sufficient size to accommodate 150 plus houses. It is agreed that on those sites identified none had a lower flood risk than the application site. Consequently, the Sequential Test does not provide sufficient evidence to demonstrate that there are no reasonably available and appropriate alternative sites within the agreed area of search that are at a lower risk of flooding from any source. The requirements of Policy F5 are therefore not satisfied..

The application at present does not accord with Policy CP25 of the JCS or National Decision Making Policy F5 of the NPPF in that it has not been evidenced that the development will be safe without increasing flood risk elsewhere and where possible reduce flood risk overall. The Sequential Test is also not sufficiently robust to conclude that there are no other sites available with a lower risk of flooding.

Water Supply

The site is located within South East Water's supply Zone 4 (WRZ4-W). South East Water stated earlier this year that the WRZ4-W is forecast to face a supply/demand deficit. Put simply this means that the amount of water available, much of it drawn from local chalk aquifers is not expected to keep pace with growth.

Increasing demand on the water resource and the effect of hotter drier weather results in increased pressure on the available supplies. South East Water has advised that additional investment is required to improve the reliance of the network and future supplies. The LPA needs to understand if new development can be supported by adequate infrastructure which is a material planning consideration.

Whilst the site is within the WRZ4-W zone it is close to the edge of the zone. The Applicant has contacted South East Water to ask about water supply for the site and they have advised that water is drawn from WRZ5-W which is along the London Road in Holybourne. Whilst South East Water advise that they cannot be definitive about the exact source of the water due to them drawing water from 250 individual boreholes across a wide area, the supply for this application is outside of the WRZ4-W zone which has been identified as having a supply/demand deficit and as such is not held up by this issue.

Highways

Hampshire County Council is the Highways Authority. The Highway Authority is required to have a Local Transport Plan (LTP) that sets out its vision for future transport and travel infrastructure and deliver the plan over the period to 2050. The current LTP is LTP4.

LTP4 proposes transformational changes with a shift away from planning for vehicles, seek to decarbonise the transport system, reduce reliance on the private car and give people a choice of high quality travel options.

LCWIP's are Local Walking and Cycling Infrastructure Plans – they are a high level assessment that is used to help guide investment and support the delivery of LTP4's active travel options. All proposals would be subject to further feasibility work, detailed design and further processes before implementation. The East Hampshire LCWIP is a result of HCC working with EHDC and local interest groups and local councillors to develop a strategy for what improvements are needed. The East

Hants LCWIP predates the application, with input from local stakeholders its outcomes are shaped by those in the communities it represents and indicates that change to improve walking and cycling were supported. The LCWIP does not set out specific schemes but suggests possible ideas to improve walking and cycling through the village.

Policy CP31 of the Joint Core Strategy requires development to encourage sustainable modes of transport and reduce reliance on the private car and that new development should be located and designed to reduce the need to travel. Development that is likely to generate a significant number of additional vehicular movements will normally be expected to be located near existing centres and supportive infrastructure.

New development should be located and designed to reduce the need to travel. The policy states that development proposals will include a range of mitigating measures and, where appropriate, will be required to ensure that highway design and associated signing meets the needs of vehicular traffic and the need for safety whilst also placing a high priority on meeting the needs of pedestrians, cyclists and public transport users and without detriment to the quality of the environment.

The East Hants LCWIP refers to Holybourne and in particular Route 200 Holybourne to Alton Sports Centre. At present the barriers to walking and cycling along this route is on street parking which creates obstructions and narrows the usable space, junctions can be problematic as there is no walking and cycling infrastructure, this route has a number of side junctions which may prove tricky to negotiate.

Improving the walking and cycling environment could be achieved by reducing speeds through the village, side road junctions along the route could be tightened and continuous footways considered. There are also opportunities to improve the public realm around the local centre.

The application proposes a list of works to London Road, Holybourne; these include reducing parking along London Road and in particular where parking is on both sides of the same section of road, a 20mph speed limit, creating build outs and crossing points.

The HVA are concerned that these changes have not been brought about through collaboration with the village and this is acknowledged as the changes were borne out of the need to accommodate the 156 houses. The LCWIP was subject to wider consultation and the planning application has allowed comment on the scheme. Whilst the changes are there to meet the demands of the development the proposed solutions do reflect the ambition of the LCWIP by creating a better environment for walking and cycling. The development is of a size that allows delivery of a lot of the works that would realise the ambition of the LCWIP whilst also accepting that change is needed to London Road to accommodate the development.

Concern has been expressed about the proposed changes. The HVA as well as others have raised concerns about the proposed reduction in parking along London Road. A parking survey has been undertaken but this was across one day and the HVA have not considered this sufficient. The day chosen was outside of the holiday period and in school time and as such it is considered that the results were realistic of parking along London Road. HCC in their response of Dec 2025 requested a parking assessment to review the existing parking levels along London Road to understand whether the proposed formalised parking spaces meets the existing demands. The parking assessment has been considered by HCC Highways in July 2026 and they have raised no objection to its use as a basis for parking spaces.

The car parking along London Road is to be reduced to 67 spaces to accommodate the proposed changes. The HVA are of the opinion that the road at present actually provides 195 spaces and therefore this is a significant reduction. HCC have identified a maximum 111 parking spaces that could be safely accommodated if only the minimum necessary waiting restrictions were introduced.

The HVA believe that parking displacement needs to be assessed as it could lead to problems in the side streets with obstruction of accesses, poorer visibility and possible turning conflicts. Third parties have already indicated poor parking at peak times like school pick ups and some side streets experience congestion. Drivers that may be displaced by the parking changes would still need to park legally and safely and neither the LPA or the HA can plan or mitigate the actions of all road users. The HVA and others have raised concern about the loss of car parking along London Road and consider that more consideration should be given to how people park on the road as existing, whilst this is noted it must be remembered that the primary purpose of the highway is not to park on but to allow for the movement of traffic.

A Park and Stride facility for a further 10 spaces is proposed within the new development which will provide alternative parking places, the development would also have visitor spaces and on street parking that will absorb some of the displaced demand. The HVA discount this as a solution arguing that this does not create capacity but is a behavioural assumption as to how people will park. The HVA are correct in that the proposed changes to the parking represent a behavioural change. They argue that the proposed changes do not reflect how Holybourne actually functions.

At present the parking along London Road promotes and reinforces a form of behaviour from car drivers to the detriment of pedestrians and cyclists. The status quo could be maintained but the highway network is not only for car drivers it is for pedestrians, cyclists and riders. Third parties have criticised the shift away from cars and are sceptical of its success. This is noted and it is accepted that behavioural change does not happen quickly and there would be a period of adjustment to the changes, it is also accepted that not all drivers will change their behaviour. Overall,

the proposals seek to balance parking provision with the need to improve highway safety

Holybourne Shops

The Holybourne shop and post office is located in the centre of the village along London Road. People visiting the shop/post office in cars will park on the road close to the shop, at present there is parking along a longer stretch of London Road than that proposed by the London Road improvements. The owner of the shop has raised concern about the impact of the changes on their business and the future viability of the shop. The shop relies heavily on being a hub for deliveries to the village and the ease of access for delivery vehicles is key to this. The shop owner suggests that most of his business comes from this with people collecting parcels and then making other purchases. The shop owner indicates that less of their trade is from people in the village seeking to buy groceries only and estimates this is 15% of all trade although this is only an estimate. The shop owner does not consider the addition of 150+ houses in the village would compensate for any loss of trade from deliveries.

The proposed change makes pedestrian access easier to the shops with a dedicated crossing point. A few of the on-street parking spaces in close proximity to the shop would have a 30 minute time restriction to ensure those spaces are available for the shop and post office. The Highway Authority acknowledges that currently deliveries are hampered by informal parking, plans show that there is a place for deliveries on the double yellow lines is possible and this is a solution which would be in accordance with legislation. Delivery vehicles would be able to park close to the shop and would be less likely to be hampered by existing parking which would be formalised.

Third parties also indicate that they drive from within the village to the shop when they have large parcels and whilst this is acknowledged a better walking and cycling environment could encourage villagers to walk/cycle to the shop with smaller more easily carried parcels reducing parking demand outside of the shop.

Both Andrew Endowed and Treloars Schools have raised concerns about the changes to London Road and what this will mean for school drop off and pick up times.

Treloars

The proposed changes look to reduce the Treloars access which at present is wide and shallow allowing higher vehicle turning speeds making it difficult to navigate for pedestrians. Treloars also has an ‘acceleration lane’ when exiting the site and heading east, over the years this has been used as a parking area which was never its intention. Third parties believe this area was formalised as parking but there is no

evidence of this, the lane did at one point have stripes across it to delineate that it was not a parking area but these were removed.

Concern has been expressed by Treloars as to the loss of this 'layby', they argue that part of the reason the Infected Blood Memorial was chosen to be located where it is, is because of the on street parking. Whilst this is noted the Memorial will remain accessible and interested persons will still be able to park close by and view.

Treloars raised concern that despite speaking to the Applicants Highway consultants regarding their concerns none of the concerns were addressed. The Highway scheme has been evolved with the Highway consultants and the Highway Authority and changes to the scheme have been made where they can but not all of Treloars requested changes could be made.

Andrews Endowed

A number of on street parking spaces are to be removed from outside Andrews Endowed Primary School, a build out crossing point incorporated and yellow lines implemented. The Highway Authority acknowledge that the proposed changes have attracted multiple objections. However, they advise that this area had been previously identified as a significant bottleneck with parents expressing concern that it was not safe to let children walk or cycle to school.

During the Section 278 detailed design stage, further consideration would be given to the extent and form of waiting restrictions. The Applicant has also agreed a payment of £7000 towards the school to support the development and delivery of the School Travel Plan which complements the proposed London Road mitigation works.

Cycle Alton

Cycle Alton have expressed concerns and raise an objection to the proposed changes to the London Road and believe that the proposed changes will positively deter people from cycling. The LCWIP designates the route through Holybourne as a primary route and Cycle Alton notes that the route is not compliant with Government Guidance and that following the works the route would still not comply with Government Guidance. Whilst this is noted it needs to be remembered that the provision of cycle routes are being incorporated into an existing road network and that there is insufficient space along the route to provide a dedicated cycle route along its length. The proposed changes however do represent a betterment to the existing situation. The reduction in speed to 20mph creates a lower speed environment which is more conducive to carriageway cycling. Cycle Alton do provide a solution which is to create an off road cycle route to the north of the site utilising the St Swithuns Way long distance footpath, this would be upgraded to create a shared path for pedestrians. Whilst a car free route may be preferable, HCC advise that this path is unavoidably constrained on width due to land ownership and as such the upgrading of this path to a shared path is not possible.

Montecchio Way Junction

The London Road/Montecchio Junction links Holybourne with Alton and at present this junction already experiences delay and congestion during peak periods. The development is expected to increase demand through the junction by 68 two-way vehicle movements in the morning peak and 64 two-way vehicle movements in the afternoon peak. This would reduce to 40 and 47 respectively under a vision led scenario. This increase is considered significant enough to warrant mitigation. Consideration has been given to increasing physical capacity at this junction. However, due to the constrained nature of the existing corridor and limited land availability there are no engineering solutions which would result in meaningful increases in vehicular capacity at this time.

The Highway Authority considers that measures which reduce local car dependency and encourage sustainable travel represent the most effective and deliverable means of mitigating the development's impact. The applicant has agreed to provide a financial contribution of £247,422 secured through a S106. This would be used for sustainable transport measures that mitigate the developments impact on the London Road/Montecchio Way junction. The following interventions were identified under Scheme 200.1.3 of the LCWIP;

- Enhanced connectivity between existing, walking and cycling routes
- New and Improved crossing facilities
- Completion of missing footway links around Garstons Way
- Improve connections between Holybourne, Mill Lane and Montecchio Way

If the contribution cannot support full delivery of the wider scheme the funding could be used to support elements of the project the contribution could be used to complete missing footway sections and improve connectivity to existing crossing facilities.

The contribution could also support Scheme 200.1.4 with the following elements;

- Improvements to the Anstey Road and Lansdowne Road active travel corridor
- Enhancements to cycle connectivity between Holybourne, Alton town centre and Alton railway station.

Further measures identified within Schemes 200.1.5, 200.1.7 and 200.1.8 may also be appropriate, subject to detailed design and funding availability.

The measures identified would reduce vehicular demand through the London Road/Montecchio Way junction. Due to the scale of the existing population within Holybourne and the wider catchment even if a modest shift from car travel to walking and cycling would offset a proportion of the development traffic.

Access

The proposed access to the site is to be agreed and is to be located slightly off centre of the boundary of the site with London Road. The access is located 36 metres east of Rakemakers and 31 metres west of Pentons Close therefore forming a stagger. Amended drawings have been submitted showing double yellow lining proposed within the visibility splays. The access is within the proposed 20mph zone and as such the stagger of the junctions is acceptable. The Highway Authority have raised no objection to the new access.

Parking

Policy CP31 of the JCS requires development to *provide adequate, convenient and secure vehicle and cycle parking in accordance with adopted standards.* The adopted standards are set out in the Council's Vehicle Parking Standards SPG. The residential parking standards are as follows:

Size of dwelling (gross)	**Minimum Car Parking Requirements**		**Minimum Cycle Parking Requirement**	
	Long stay (resident)	**Short stay (visitor)**	**Long stay (resident)**	**Short stay (visitor)**
1 bed dwelling	1 space per dwelling	1 space per 5 dwellings	1 space per dwelling	Visitor cycle spaces will be expected at 10% of the long stay cycle spaces in developments of 5 units or more.
2/3 bed dwelling	2 spaces per dwelling	1 space per 5 dwellings	2 spaces per dwelling	
4+ bed dwelling	3 spaces per dwelling	1 space per 5 dwellings	2 spaces per dwelling	

The application is in Outline and so at present the final size of the dwellings are unknown in terms of bedroom spaces. The Planning Statement states that parking will be in accordance with the adopted standards.

Public Rights of Way

Hampshire County Council are responsible for the Rights of Way network. They are also responsible for producing a Countryside Access Plan (CAP). Holybourne is covered by the Hampshire Downs CAP. Hampshire has a number of CAP's covering the whole county and together these make up the Rights of Way Improvement Plan (ROWIP) for the county of Hampshire. The duty for local highway authorities to produce a ROWIP was established through the Countryside and Rights of Way Act (2000). A ROWIP is intended to provide the means by which the highway authority will manage and improve its rights of way network to meet the Government's aim of better provision for walkers, cyclists, equestrians and people with mobility problems.

The indicative Masterplan shows numerous linkages into the existing PROW network and HCC are supportive of those links. The development will put further pressure on the PROW network in the area and HCC are looking to mitigate this further pressure. *Footpath 002/35/1*

This footpath is located on the edge of the sites eastern parcel and provides connectivity to St Swithuns Way and Upper Froyle. Over the years the definitive line of this path has been lost over a section running through the site and HCC requested it was either formally diverted or reinstated to the definitive line. This Footpath where it crosses the site will be reinstated onto its definitive line. To ensure the footpath can accommodate an increased number of users there is a need to resurface 270 metres of the route as it crosses the site.

Footpath 002/32/1, 002/32/2 and 002/505/1

These three footpaths are located to the north of the site it is considered that Footpaths 002/32/2 and 002/505/1 require some vegetation clearance and resurfacing. Footpath 002/32/1 has an acceptable surface and will not require upgrading.

Footpath 002/33/3

This Footpath is wholly within the red line of the site and it is assumed the applicant would resurface the whole of this route. Consideration had been given in the Applicants WCHAR to upgrading this route to provide cycle routes but due to landowner constraints this has not been possible and HCC are satisfied this is not pursued.

Bridleway 002/501/3 and 002/201/4

This PROW runs adjacent to and within the sites eastern boundary and has an existing acceptable surface. HCC have, however requested an ongoing maintenance contribution to this route.

Footpath 002/29b/2-3-4

This is a key pedestrian route and whilst the surface at preset is acceptable HCC are seeking a contribution towards maintenance.

HCC have raised no objection subject to a contribution of £97,010.32 for works and maintenance of the PROW as detailed above and this is considered to meet the tests. It is not considered that the LPA can take a contribution for future maintenance as it would not meet the tests as set out in the NPPF in that it is not directly related to the development. Any future deterioration of the Footpaths in the area would not be solely down to future occupiers of the site and as such seeking a maintenance contribution would not be relevant to the development.

The proposed access is considered acceptable. The site proposes to provide parking in accordance with EHDC parking standards and this would be dealt with in any future RM application.

The proposed works to the London Road seek to reduce reliance on the private car and places a higher priority on walkers and cyclists and this accords Policy CP31 of the JCS the Highway Authority's Transport Plan and the NPPF.

Ecology

Policy CP21 of the JCS requires development to maintain, enhance and protect the Districts biodiversity and its surrounding environment.

The site is comprised of a number of fields of non-cereal crops, modified grassland and other neutral grassland. The boundaries of the site are trees, native hedgerows and native hedgerows with trees.

The Ecological Assessment (EA) advises that the areas of all types of grassland on the site are unlikely to be important for nature conservation and neither would the arable land or the surface of the PROW.

The EA advises that there are nine hedgerows across the site and these would be considered priority habitats.

The EA shows that there is evidence of dormice, hedgehogs and bats. It will also likely frequented by species that use the wider area like brown hares and badgers.

The Council's Ecologist advises that all of the field boundaries are of clear ecological value providing connections to higher quality habitats which support a range of protected species. The hedgerows and field boundaries are to be retained. Conditions are suggested and these can be attached.

<u>Biodiversity Net Gain BNG</u>

A Statutory Biodiversity Metric demonstrates that the proposed development will deliver an onsite biodiversity net gain of 10.17% for area habitats and 26.30% for linear habitats. These gains include a notable increase in both the extent and quality of medium distinctiveness habitats, through the creation of other neutral grassland in good condition, the enhancement of existing grassland to this condition, the planting of 176 trees, and the establishment of mixed scrub and species-rich hedgerows with trees in good condition. This equates to an uplift of 6.31 area habitat units and 4.75 linear habitat units.

It is considered that the proposal does accord with Policy CP21 of the JCS and would increase Biodiversity in accordance with the requirements of BNG.

Quantum of Development

The application seeks up to 156 dwellings and this quantum of development has been objected to by residents of the village and the HVA. Their concerns are that this represents a 30% increase to the size of the village and a development of this size would not support the form and function of the settlement. Holybourne has access to a village shop, pub, primary school and a theatre. In real terms Holybourne provides a good level of services to residents. These services are also enjoyed by people from outside the settlement. In light of the direction of travel from Government and the services that Holybourne offers the provision of 156 houses would support the services within the village and as such the role and function of that settlement.

The application is in Outline with only access to be agreed meaning that any layout plans are considered indicative. At Outline stage any indicative layout is largely used to agree the quantum of development in this case up to 156 dwellings. The Design Officer has raised some issues with regard to layout and concluded that the site can accommodate 153 dwellings. The application description has maintained a figure of up to 156 dwellings.

As discussed above the site has a groundwater flooding issue and at present it is not considered that the implications of this are fully understood in terms of capturing all groundwater emergence, spring conveyance routes and other seepages. Without understanding the full implications of groundwater flooding, it cannot at this time be satisfactorily evidenced that the maximum 156 dwellings could be accommodated on the site. It is accepted that the description says up to 156 dwellings and that indicative plans have been provided that show that this could be possible and that less housing could be delivered. However, at this time these indicative plans are not based on a full understanding of the impacts of the groundwater flooding on site, as such the indicative plans cannot be relied upon as showing an achievable quantum of development.

Design and Layout

The application is on Outline with only access to be considered but a number of Parameter Plans have been provided. These show the proposed land use, density and heights. Storey heights across the site are all shown as 2 storey The site increases in height from London Road to the northern boundary of the site. The Parameter Plan shows that in the centre of the site the two storey dwellings would have a maximum ridge height of 11 metres, towards the north and west boundaries the maximum ridge height would be limited to 10 metres.

The Parameter Land Use plan shows large areas of open space throughout the site. A large landscape buffer is proposed along the northern and western boundary, this will keep the built form away form the boundary with the countryside and provide some separation with Holybourne Conservation Area. A large area of open space is

proposed on the eastern side of the development and immediately adjacent to the Scheduled Ancient Monument.

The proposed development would be 25-35dph in the centre of the site with a lesser density of 15-25dph on the northern and eastern edges of the development.

It is considered that the Parameter Plans do take account of the existing development and its edge of countryside location. Whilst the layout will be considered at RM stage, the Parameter Plans and indicative layout show that an appropriate form of development is possible, that it would allow for the retention of landscape features and the creation of green space within the development.

Amenity

Policy CP27 requires development to not have an unacceptable effect on the amenity of occupiers of neighbouring properties through loss of privacy or through excessive overshadowing. The application is in Outline with only access to be agreed, the layout plan submitted is indicative and shows a potential layout of the dwellings. It is considered that the future internal layout of the site can be designed to ensure that there would be no overlooking/overshadowing between future dwellings and towards existing dwellings. At present amenity cannot be fully assessed as the layout of the site has not been agreed upon. However, it is considered that the site does allow for a layout that would accord with Policy CP27.

Affordable Housing

Policy CP11 of the JCS seeks to provide a range of dwelling tenures, types and sizes to meet housing needs. The strategy is to ensure that all residential development helps to address the diversity of housing needs of local people at all stages of life by providing a mix and choice of homes by type, size, and tenure and cost.

The number of applicants who have registered on Hampshire Home Choice (HHC) with a local connection with Holybourne, Alton and the wider district (live, work or have family there) is currently.

Hampshire Home Choice Bedroom Size	**Holybourne Connection**	**Alton Connection**	**East Hampshire Connection**
1 bed	17	201	836
2 bed	7	131	462
3 bed	8	86	296
4 bed	1	38	98
Total	33	456	**1692**

Whilst these figures represent a snapshot in time and are subject to fluctuations as people leave or join the register, they do show an ongoing need for affordable housing in Holybourne, Alton and the wider district.

The Planning Statement advises that 40% Affordable Housing will be provided on site which equates to 62.4 affordable homes, this can be delivered as 63 on site or 62 on site with 0.4 secured as a commuted sum.

The Council seeks a tenure split of 70% rented housing and 30% intermediate housing with 25% of the rented provision delivered as social rent.

As the application is in Outline, the final details of tenure and dispersion through the site are yet to be agreed upon. However, the indicative housing mix as proposed in the Affordable Housing Statement is suitable as it meets the identified need. As such the application meets the requirements of CP11 of the JCS.

Public Open Space

Policy CP18 and the Open Space Study 2026 require that new residential development makes provision towards public open space, with the expectation for larger developments being that this public open space should be on site. Public Open space includes the following typologies:

- Parks and Gardens
- Natural and semi-natural green space
- Green Corridors
- Amenity Green Space
- Allotments and Community Orchard
- Cemetries and Churchyards
- Provision for children or young people.

Public open space (POS) provision is provided at the following rate of 3.24 hectares of public open space per 1000 population. This equates to 1.24ha of open space. The application will provide 7.1ha of open space which includes the replacement play area a large kick about area. The development would provide provision for children and young people, amenity green space and natural and semi natural green space. There will be a requirement to secure the on-site public open space within the development to an approved design, together with the requirement to secure the management and maintenance of the POS. There will also be a requirement to secure the children's play space within the development to an approved design, together with its long term management and maintenance. This would be through the S106. It is considered that the site does meet the requirements of Policy CP18 of the JCS.

Infrastructure

Policy CP32 of the JCS states that where the provision or improvement of infrastructure is necessary to meet community or environmental needs associated

with new development or to mitigate the impact of development on the environment, the payment of financial contributions will be required through planning obligations and/or the Community Infrastructure Levy (CIL) to ensure that all such development makes an appropriate and reasonable contribution to the costs of provision. CIL was implemented by the Council in 2016 and the proposed land use in this application would be CIL liable. The current charging schedule for this part of the district requires a CIL payment of £150 per sqm.

Contributions under S106 need to meet the tests as set out in the CIL Regulations and these are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Integrated Care Board

The ICB are requesting £145,427 towards increasing primary care infrastructure. The closest surgeries to the site are the Chawton Park Surgery and the Wilson Practice. These two surgeries will not be able to absorb the additional patient capacity from this development without increasing patient infrastructure capacity. It is considered that this contribution is reasonable and necessary and as such will be secured through the S106.

Planning Balance

The Council has a 2.9 year HLS and as such NPPF Policy S5 applies because the Council cannot demonstrate a five-year supply of deliverable housing.

Sub-paragraph 1(h) of Policy S5 advises that residential development physically well related to an existing settlement which this site is and which is of a scale that could be accommodated by necessary infrastructure which this scheme would be through S106 obligations and conditions and would also meet an evidenced unmet need as required by Sub-Paragraph 1(j) is acceptable. Sub-paragraph 2 of this Policy sets out the circumstances in which the benefits of approving development in line with the criteria in sub-paragraph 1 are restricted to national decision-making policies which state such proposals should be refused when substantially outweighed by any adverse effects when assessed against national decision-making policies in the Framework.

The site is covered by the Alton Neighbourhood Plan (NP) which was made less than 5 years ago in November 2021 the NP does allocate housing sites under HO3 but this does not allocate the application site. Notwithstanding this, the NP does carry substantial weight in the decision-making process. The proposal conflicts with the development strategy set out within the Neighbourhood Plan and would result in the loss of a designated Local Green Space. These matters weigh against the proposal. However, they must be considered alongside the Council's significant housing land supply shortfall and all other material considerations.

East Hants has a 5 year housing land supply of 2.9 years which is considered to be a significant shortfall and the provision of 156 house carries substantial weight and would deliver both market and affordable housing.

The application would result in the loss of Grade 2 and 3a agricultural land and these grades are considered some of the Best and Most Versatile.
The Landscape Officer has identified that moderate adverse impacts in Year 15 would be felt on the site itself and some wider viewpoints particularly those to the north and northeast would experience minor to moderate adverse views in Year 15.

The Landscape Officer has concluded that the landscape mitigation, architectural detailing and typologies will be a key to the integration of the development. It is likely that even with mitigating effect the LVIA indicates a moderate adverse impact. The development would result in the loss of BMV land and whilst this is unfortunate it is not of a scale that would outweigh the delivery of 156 homes. It is considered that any development in the landscape is unlikely to have no impact and in this case a moderate adverse impact after 15 years is outweighed by what the application delivers for Holybourne.

The development would result in the loss of a designated Local Green Space (LGS). National policy requires proposals affecting Local Green Space to be determined in a manner consistent with the relevant national decision-making policies applicable to Green Belt land. Whilst the proposal would not fully satisfy all aspects of the Green Belt Golden Rules, due to the affordable housing provision falling below the 50% level referred to in Policy GB8, it would nevertheless deliver 40% affordable housing together with enhanced public open space, infrastructure improvements and biodiversity benefits.

The loss of the designated LGS and harm to those attributes contributing to its significance, including its openness, recreational value, accessibility and contribution to views towards Holybourne Down, attract significant weight against the proposal.

The replacement play area and kickabout space would be larger than the existing facilities, would remain publicly accessible and centrally located within Holybourne and would accord with Policy CP17 of the JCS. This attracts significant weight in favour of the proposal. Whilst the wider views are not separately designated, they form part of the significance of the LGS and have been taken into account in the assessment. The proposed works to the London Road seek to reduce reliance on the private car and places a higher priority on walkers and cyclists and this attracts moderate weight as it helps to fulfil the aspirations of the LCWIP for the area and reflects the NPPF in the reducing reliance on the private car.

There would be some harm to the designated heritage assets and the Scheduled Ancient Monument setting through the introduction of the development. The Conservation Officer has advised this would be less than substantial. This would be weighed against the public benefits of the proposal which in this case in terms of securing 156 new dwellings and 40% affordable housing would outweigh this harm.

The proposed development will maintain established field boundaries and trees and will enhance Biodiversity on the site and this carries moderate weight.

There are other benefits to the development in terms of economic benefits in terms of jobs during construction and the future residents supporting local businesses and this would be attributed moderate weight as some of these benefits like construction jobs are short lived.

The development does afford some significant benefits in terms of providing much needed housing and affordable housing. Even when moderate weight is afforded to outcomes of the development these are still considered to have positive benefits.

However it is considered that the benefits which would be substantial do not outweigh the substantial harm identified by the risk from Groundwater Flooding There is insufficient understanding at this time of the extent and nature of the groundwater flood risk, all sources of groundwater and how groundwater would react to additional hardstanding/foundations etc, subsequently it cannot also be concluded at this time that the proposed Drainage Strategy is acceptable. Accordingly, conflict is identified with Policy CP25 of the JCS and national decision-making policies F5 and F7

Were it not for the unresolved groundwater flood risk concerns it is considered on balance and notwithstanding the adverse impacts identified, the benefits of the proposal would outweigh the identified harms and would represent a sustainable form of development that would make a significant contribution towards addressing the District's acute housing land supply shortfall.

Recommendation REFUSE (subject to compliance with the requirements of the Town and Country Planning (Consultation)(England) Direction 2026 and provided that the Secretary of State does not direct that the application be called in for determination

For the following reasons

1. It has not been satisfactorily evidenced at this time that the extent and behaviour of groundwater on site is fully understood. Therefore, it cannot be currently concluded that the proposed quantum of development can be accommodated on site due to a lack of understanding of how much of the site is impacted by groundwater and what implications that has for the amount of developable land remaining once groundwater extent and possible mitigation are accounted for. This would not be in accordance with Policy CP25 of the Joint Core Strategy or National Decision Making Policy F8 of the NPPF

2. The Drainage Strategy relies on certain groundwater assumptions and it has not been evidenced at this time that the extent and behaviour of groundwater on site is fully understood. To this end it cannot at this time be concluded that

future occupiers would remain safe from current and future groundwater flooding or that the development would not increase the flood risk elsewhere. This would not be in accordance with Policy CP25 of the Joint Core Strategy or National Decision Making Policy F4 of the NPPF

3. The Sequential Test as submitted does not identify any other reasonably available sites within the area of search that have not already been identified by the LPA and as such it has not been satisfactorily evidenced at this time that there are no potential sites within the search area at a lower risk of flooding. This would not be in accordance with Policy CP25 of the Joint Core Strategy or National Decision Making Policy F5 of the NPPF

4. In the absence of a Legal Agreement to secure the following;

- Site Access arrangement shown in principle on drawing 020.0902-0004 P08
- TRO to enable double yellow lines as shown in principle on Drawing
- 020.0987-0001 Rev P07. And reduction of speed limit on London Road from 30mph to 20mph and provision of time restricted parking bays as shown on approved drawings
- Secure either/or option on Treloar's access as shown on drawings 020.0902-0019 rev P04 and 020.0902-0035 Rev P02
- Scheme to be technically approved to satisfaction of the Highway Authority
- Contribution of £247,422, towards mitigating the impacts of the development at the London Road/Montecchio Way junction through sustainable mode improvements in accordance with route 200.1 of the East Hants LCWIP.
- Prior to occupation to pay the contribution of £7,000 towards School travel plan
- Prior to occupation for the full travel plan to be submitted for approval by the Highway Authority in accordance with the framework travel plan with the travel plan to be implemented in accordance with the agreed document.
- To pay the associated Travel Plan approval and monitoring fees prior to occupation.
- Contribution of £97,010.32 towards improvements to PRoW in the vicinity of the site including FP35, FP32, FP505, FP29b & BW501.
- Secure 40% Affordable Housing
- Secure the on-site public open space within the development to an approved design, together with the requirement to secure the management and maintenance of the POS.
- Secure the children's play space within the development to an approved design, together with its long term management and maintenance.
- Secure £145,427 towards increasing primary care structure

The application does not accord with Policies CP11, CP18, CP31, CP32 of the Joint Core Strategy and Decision Making Policies HO8, TR4, TR8 and HC4 of the NPPF