

# Responses to pre-submission Neighbourhood Plan from statutory consultees and external bodies 2015

updated 23 June

## KEY

General

Landscape, the built environment and local distinctiveness

Housing

Working

Shops and Services

Learning and Skills

Getting around

Community services

Enjoyment and recreation

Site specific/site allocation

Name	Comment	Response to comment	Proposed change to NP
North Wessex Downs AONB	We commend those involved in taking on the task of producing a Neighbourhood Plan. The village and its surroundings, including those parts of the area within the North Wessex Downs AONB and its setting, are subject to great pressure for large-scale development. We hope that the Plan will enable a more considered approach to development planning decisions in the plan area, yielding better outcomes for the landscape and the community, than has perhaps been possible hitherto.	Acknowledged, thank you	
North Wessex Downs AONB	With regard to the criteria listed under certain policies, the Plan is unclear as to whether all of these apply or not, e.g. whether, under Policy LB1, points 1, 2, 3 and 4 must be complied with or compliance with fewer points is acceptable. We presume that the intention is that they all apply where relevant. If this is the case, we recommend that the lists be amended to make this clear, e.g. by stating that "all the following criteria must be met" or adding "and" before the last criterion on each test.	Agreed	Plan to be modified to clarify ALL policies apply
North Wessex Downs AONB	<b>Setting</b> The relevance of the Plan to the North Wessex Downs AONB is not confined to the designated area alone. We are particularly keen to emphasise the importance that attaches to the setting of the AONB. Setting is a complicated concept, and our advice to partners is set out in more detail in the AONB Position Statement on Setting. This has been approved by Basingstoke and Deane Borough Council as a member of the AONB's governing Council of Partners. We suggest some reference to setting be incorporated into the Plan policies and/or text relating to landscape (see below).	Agreed	Setting in relation to AONB to be given greater emphasis in revised text
North Wessex	<b>Vision</b> This has a strong focus on the village environment itself, albeit including a reference to its setting. We appreciate that the vast majority of residents, and development pressure, are focussed on the village. However, most of the area covered by the plan is outside	Noted	Additional text in landscape section

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Downs AONB	it. We therefore suggest the Vision might be improved by amending the wording to include, or adding a reference to, the environment and landscape elsewhere within the plan area.		landscape giving more emphasis but no change to Vision Statement
North Wessex Downs AONB	<b>Landscape</b> We welcome the reference to the North Wessex Downs AONB in Objective E2. All public bodies (including Overton Parish Council) have a statutory duty under s.85 of the Countryside and Rights of Way Action 2000 to have regards for the purposes for which the AONB was designated, i.e. to conserve and enhance the natural beauty of the landscape. The relevant local authorities also have a statutory duty to produce a review a Management Plan for the AONB. However, we should point out that the AONB Partnership is not a statutory body, nor is the AONB Unit that works on behalf of the partners. Thus the wording as it stands would exclude working with the AONB Unit or Partnership. We suggest the wording be amended to allow collaboration with the AONB, e.g. by inserting “ and other relevant partners” after “statutory bodies”.	Noted	Reference to partner organisations added
North Wessex Downs AONB	As discussed with members of the project team, the conservation and enhancement of the wonderful landscapes within the Plan area could beneficially be highlighted more prominently. We recommend an additional objective under landscape to cover this. Suggested wording might be as follows:  To conserve and enhance the natural beauty and distinctive character of landscapes across the Plan area, and especially those within the North Wessex Downs Area of Outstanding Natural Beauty and its setting.  Additionally, we would welcome inclusion of a criterion under Policy LB1 that explicitly refers to the need for development to conserve and enhance the natural beauty of the AONB landscape.	Noted	Supporting text for LB1 to include Conservation Area, AONB and their settings. Objective to include’ to / from the open countryside’.
North Wessex Downs AONB	<b>Housing</b> We are slightly concerned that Policy H1 as drafted could be taken to imply acceptance of substantial harmful development within the AONB and its setting. We appreciate that the Plan is designed to be read as a whole, that other policies (e.g. E2) refer to AONB protection, and that there is a risk of unhelpful repetition in the Plan. However, we would request that you review the suite of policies to ensure that the need to conserve and enhance the AONB and its setting have suitable prominence and there are no loopholes that would inadvertently undermine protection of the AONB landscape.	Acknowledged	Policy H (1) reworded to comply with NPPG guidance Policy E2 reworded to take this into account
North Wessex Downs AONB	We strongly support the requirement for 40% affordable housing. Given the constraints of development in the AONB, we would hope that affordable housing need of those working in the AONB could mostly be met by sites outside the protected landscape. We think there may be scope to tighten the control the community has over this aspect through further work on the Plan. For example, if there is clear evidence that the need for affordable housing in Overton (where house prices are generally higher than the borough average) differs in character from that expressed in the draft Local Plan, the Neighbourhood Plan could usefully stipulate what proportion of affordable housing will be expected to be of different types, e.g. subsidised rent in perpetuity, part-ownership, subsidised sale etc.	Noted. Evidence not available to determine suitable %s for balance between rental and purchase of affordable housing	No change
North Wessex Downs AONB	<b>Site allocations</b> We are concerned at the allocation of sites for housing within the AONB at Willesley Warren and Ashe Warren; we understand that these sites have been included in response to expressions of interest from landowners. We believe that both sites as proposed would do significant harm to the character of the protected landscape. At Ashe Warren, there appears to be an attempt to create a new hamlet at an isolated rural crossroads where there are currently only two (fairly well-concealed) houses dating from long	Noted. Ashe is an existing settlement, so Ashe Warren not an isolated settlement	Willesley Warren site not to be taken further /removed from NP as market housing better provided elsewhere.

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	<p>before the AONB was designated. At Willesley Warren, there is a risk of following conversion and replacement of existing buildings with a significant amount of new building that would, cumulatively, start to turn it from a recognisable farmstead into a small village.</p> <p>The AONB enjoys the highest level of protection in national planning policy. We would argue that greenfield sites for housing in the AONB should only be allocated if there is a clear need for the housing that cannot be met on more appropriate sites, for example sites outside the AONB. The Plan gives no indication of what demonstrable need housing on these sites would meet. Even though the proposed sites are small, given their proximity to Overton village we would prefer any rural housing need to be met on sites outside the AONB.</p> <p>However if there is an compelling identified need for housing in the AONB parts of the area, this justification should be included in the Plan. If housing need were arising from a particular land-based enterprise, a robust mechanism would be needed to ensure that the housing would remain available for that purpose and not pass into the open market. An agricultural tie might be appropriate in this case.</p> <p>Any proposal to cross-subsidise rented housing through market housing would need very convincing justification, since this would entail development that would otherwise be more appropriately sited outside the AONB.</p> <p>All proposed development within or affecting the setting of the AONB should take as a starting point the need to recognise, respond to, conserve and enhance the character of the AONB landscape. We recognise that all the sites in the Plan have been subjected to an objective assessment process that includes landscape impact. However, landscape capacity (and therefore the relative merits of different potential sites) does not appear to have been the starting point for identification of the small sites proposed in the AONB.</p>		Ashe Warren site removed on advice from B&DBC that proposed homes for agricultural workers would not count towards affordable housing.
North Wessex Downs AONB	<p><b>Dark skies</b> The area benefits from relatively dark skies – an important qualitative part of rural tranquillity and something helps to make the area special. This is threatened by the significant amounts of development proposed. In order to prevent, and ideally reduce, the degree and extent of light pollution, we recommend that the Plan include reference to this issue. Specifically, it could include a policy that the provision of new external lighting on existing and new developments should be reduced to the minimum needed and that any lighting installed should comply with dark sky standards. We recommend classifying the area as Zone E1 Natural. As well as being shielded (using a ‘full cut-off’) lighting should also be fitted with sensors and timers to ensure that it is not on all the time. The wavelength of light (i.e. where it falls on the spectrum) is also important. ‘Warm-white’ lighting is generally preferable to ‘cool-white’. The following explanation is an extract from the 2011 Buglife study on the impact of artificial light on invertebrates:</p> <p>LED wavelength, and therefore colour, can vary from the near-infrared, through visible to near-ultraviolet light. White LED lamps have a broad spectrum of light. Their wavelength peaks at 450 nm and they therefore emit much more blue light than high-pressure sodium lamps. Red, yellow and amber LED lamps each have a specific, narrower spectrum and have peak wavelengths between 590 and 660 nm, which is less attractive to invertebrates.</p>	Noted. Majority of sites in NP are distant from AONB	No change
North Wessex Downs AONB	I hope these comments are helpful. The AONB Unit would be happy to liaise with those involved to provide further information or help with improvements to the Plan as required.	Thank you	
Environment Agency	We note the Neighbourhood Plan has been developed in accordance with the National Planning Policy Framework (NPPF), the Basingstoke and Deane Borough Council (BC) Adopted Local Plan 1996 – 2011 and with the Basingstoke and Deane BC Emerging Local Plan.	Agreed	No change required

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Environment Agency	<b>Flood risk</b> We are pleased to see that all the proposed site allocations for delivering 154 dwellings are located entirely in flood zone 1.	Agreed	
Environment Agency	<b>Water quality and water resources</b> We welcome objective H3 and related policy H3 (page 22). However, since the allocated sites are underlain by the principle aquifer (Chalk), which is vulnerable to polluting activities, we recommend that policy H3 is strengthened with the inclusion of policy EM6 “Water quality” from the Basingstoke and Deane BC Emerging Local Plan. In line with paragraph 109 of the NPPF, this is sought in order to ensure that within new developments, the risks of contamination to controlled waters are understood and adequate mitigation measures are put in place. Moreover, we welcome that policy H3.2 states that housing development will be permitted if these developments conform to Basingstoke and Deane BC Green Infrastructures Strategy 2013. However, we recommend that more specific reference is made to the use of Sustainable drainage systems (SuDS), since these can help protect and improve water quality, especially within sensitive locations underlain by a principle aquifer.	Noted. Regarding B&DBC Emerging Policy EM6, no sites adjacent to water courses.	Policy wording amended to include SuDS
Environment Agency	We also support objective H5 and related policy H5 (page 23) which take account of sewage capacity issues and ensure that water supply infrastructures are put in place to support new housing developments. Furthermore, we welcome that the Parish liaised with Southern Water in order to check the capacity of sewage infrastructures. However, we would like to highlight that policy H5 is supported by policy CN6 “Infrastructures” from the Basingstoke and Deane BC Emerging Local Plan, and not by policy CN5 as stated in the justification paragraph of the Neighbourhood Plan (page 23).	Noted	Reference CN5 replaced by CN6
Southern Water	Southern Water is the statutory water and sewerage undertaker for Overton. Southern Water has a statutory duty to serve new development, and is committed to ensuring the right infrastructure in the right place at the right time in collaboration with developers, the parish council and the local planning authority. The adopted Overton NDP and adopted Basingstoke & Deane Local Plan will inform Southern Water’s investment planning. Adoption provides the planning certainty required to support investment proposals to Ofwat, the water industry’s economic regulator. Investment proposals are prepared every five years through the price review process. Last year’s price determination will fund the investment programme for the period to 2020. There will be another price review in 2019, covering the investment period 2020 to 2025. Strategic infrastructure, such as extensions to wastewater treatment works, can be planned and funded through the price review process, and coordinated with new development. However, Ofwat takes the view that local infrastructure, such as local sewers, should be funded by the development if specifically required to service individual development sites. To this end, the principle is that new development needs to connect to the sewerage system at the nearest point of adequate capacity. This may require off-site infrastructure if the nearest point is not located within the immediate vicinity of the development site.	Noted	No action required
Southern Water	<b>Policy H5 Page 23</b> We note from Policy H5 that development proposals will be supported in Overton providing a viable plan is in place for the sewerage system “for the whole village” prior to connection of any new development.  Southern Water agrees that new development should not be permitted unless the infrastructure required to serve it is either available, or can be provided in time to serve it.  This approach is endorsed by government advice and guidance, including the paragraph 45 (Reference ID: 41-045-20140306) of <b>National Planning Practice Guidance</b> (NPPG) that states ‘ <i>Infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way. The following may be important considerations for a qualifying body to consider when addressing infrastructure in a neighbourhood plan: *what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way</i> ’. The delivery of any requisite local infrastructure to serve development is also supported by policy CN6 of <b>Basingstoke &amp; Deane’s emerging Local Plan</b> and paragraph 17 of the <b>National Planning Policy Framework</b>	Noted	Infrastructure policy wording amended as suggested. Further discussion required between developer and Southern Water regarding site ‘S of Two Gate Lane’.

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	<p>(NPPF).</p> <p>Southern Water recognises that flooding events have occurred in the Overton catchment in the past, and that there is limited spare capacity in the sewerage system for new development. The catchment may be affected by surface water and/or ground water inundation. However, this does not prevent development from coming forward, as additional capacity can be provided in parallel with the development.</p> <p>In the absence of a finalised drainage plan, development proposals can be supported and permitted providing the risk of flooding is not increased. We have assessed the sites allocated in Policy SS1 (where 20 homes or more are proposed) and concluded that there is currently <b>insufficient</b> capacity for the development 'S of Two Gate Lane'. You will find a separate representation from us on this (Policy SS1). For 'W of Sapley Playing Field', our assessment concludes that this proposal could be accommodated without a significant increased risk of flooding.</p> <p>We consider that this should be recognised in Policy H5 and propose amendments below accordingly. We also propose amendments to the justification put forward so that it more closely reflects the referenced notes of the meeting of 30<sup>th</sup> April 2010 (reference 56).</p> <p><b>Proposed amendment (new text underlined)</b></p> <p><i>Policy H5:</i>  <i>Development proposals will be supported providing</i></p> <ol style="list-style-type: none"> <li>1. A viable <del>utilities</del> <u>drainage</u> plan is in place for adequate capacity of the <u>land drainage and sewerage</u> system for the whole village prior to connection of any new development to the sewerage system, <u>or it is demonstrated that the risk of flooding is not increased</u> as a condition for approval.</li> <li>2. Access roads to a site.....</li> </ol> <p><b>Justification</b></p> <ol style="list-style-type: none"> <li>1. The sewerage system <u>experiences inundation of surface and/or groundwater and is already operations at full</u> near maximum capacity.</li> <li>2. This policy aims to.....</li> </ol>		
Southern Water	<p><b>Policy E3 Page 27</b></p> <p>Southern Water understands the desire to protect open spaces. However, we can not support the current wording of this policy as it could create a barrier to utility providers, such as Southern Water, from delivering its essential infrastructure required to serve existing and planned development.</p> <p>Southern Water considers that should the need arise, the provision of essential wastewater or sewerage infrastructure (e.g. a new pumping station) required to serve new and existing customers or meet stricter environmental standards, would constitute special circumstances whereby our development should be allowed. There are limited options available with regard to location, as the infrastructure would need to connect into existing networks. The <b>National Planning Practice Guidance</b> (NPPG) recognises this scenario and states that '<i>it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered</i>'.</p>	Noted	Wording amended as suggested

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	<p>We made similar representations in respect of the Arundel Neighbourhood Development Plan and the Examiner agreed that utility infrastructure can represent very special circumstances. A similar policy to our proposal is included on page 13 of Locality's recently issued 'guide to writing planning policies which will address the issues that matter to your neighbourhood plan' by Tony Burton called 'Writing planning policies'.</p> <p><b>Proposed amendment (new text underlined)</b></p> <p>To ensure consistency with the NPPG, we propose the following additional wording to policy E3:</p> <p><i>Developments leading to opportunities for increased open spaces will be permitted provided they conform to the BDBD Green Infrastructure Strategy. Proposals leading to their loss will be opposed, <u>unless the development is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.</u></i></p>		
Southern Water	<p><b>Policy SS1 Page 36</b></p> <p>In line with paragraph 162 of the <b>National Planning Policy Framework (NPPF)</b> and the <b>National Planning Practice Guidance (NPPG)</b>, we have assessed the sites allocated in Policy SS1 (where 20 homes or more are proposed) and concluded additional local sewerage infrastructure would be required to accommodate the proposed development 'S of Two Gate Lane'. A connection to the local sewerage system at the nearest point of adequate capacity is the mechanism by which the development could provide the infrastructure necessary to serve it.</p> <p>There is a risk that the necessary local sewerage infrastructure will not be delivered in time to service the proposed development, unless delivery is supported by planning policies and subsequently in planning conditions. This is endorsed by the core planning principles, identified in the NPPF, notably to: '<i>proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs</i>' and ensure that plans '<i>provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency</i>'. Our approach is also supported by paragraph 21 of the NPPF, which requires that planning policies should recognise and seek to address any lack of infrastructure. The NPPG specifies that '<i>Adequate water and wastewater infrastructure is needed to support sustainable development</i>'.</p> <p>It is usual for policies that allocate housing sites to identify the development principles, which would mirror the approach taken in the <b>emerging Basingstoke and Deane Local Plan</b>.</p> <p><b>Proposed amendment (new text underlined)</b></p> <p>Accordingly, to ensure consistency with strategic policies, the NPPF and NPPG, we propose the following additional wording to policy SS1:</p> <p><i>The development at S of Two Gate Lane will provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.</i></p>	Noted	Suggested wording to be included in site-specific policy for S of Two Gate Lane'
Southern Water	<p><b>New policy on the provision of infrastructure</b></p> <p>We can find no policy provision to support the delivery of new or improved infrastructure. Southern Water is the statutory water and sewerage undertaker for the area covered by the Neighbourhood Development Plan (NDP). Southern Water has a statutory duty to serve new development, and is committed to ensuring the right wastewater infrastructure in the right place at the right time in collaboration with developers, the parish council and the planning authority. The adopted Overton NDP and adopted Basingstoke &amp; Deane Local Plan will inform Southern Water's investment planning. Adoption provides the planning certainty required to support investment proposals to</p>	Noted	Suggested wording incorporated with water supply, drainage and sewerage specified incorporated in new policy.

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	<p>Ofwat, the water industry's economic regulator. Investment proposals are prepared every five years through the price review process. Last year's price determination will fund the investment programme in the period to 2020. There will be another price review in 2019, covering the investment period 2020 to 2025.</p> <p>Although there are no current plans, over the life of the NDP it is possible that we will need to provide new or improved infrastructure. Page 8 of the <b>National Policy Statement for Wastewater</b> states that '<i>Waste water treatment is essential for public health and a clean environment. Demand for <b>new and improved</b> waste water infrastructure is likely to increase in response to the following main drivers: <b>More stringent statutory requirements to protect the environment and water quality; Population growth and urbanisation; Replacement or improvement of infrastructure; Adaption to climate change.</b> The Government is taking measures to reduce the demand for new waste water infrastructure to complement these approaches and ensure that the natural and man-made systems are able to function effectively together to deliver a wide range of ecosystem services and other benefits to society.</i></p> <p>Accordingly, we seek policy provision to support new or improved utility infrastructure. Such policy provision would also be in line with the main intention of the <b>National Planning Policy Framework (NPPF)</b> to achieve sustainable development. For example, one of the core planning principles contained in paragraph 17 of the NPPF is to '<i>proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs</i>'. Also paragraphs 157 and 177 of the NPPF require positive planning for development and infrastructure necessary in an area.</p> <p><b>Proposed amendment</b></p> <p>To ensure consistency with the NPPF and other government guidance and facilitate sustainable development, we propose the following additional policy:</p> <p><u><i>New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan.</i></u></p>		
English Heritage	The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of assistance <a href="http://www.english-heritage.org.uk/caring/get-involved/improving-your-neighbourhood/">http://www.english-heritage.org.uk/caring/get-involved/improving-your-neighbourhood/</a> .	Agreed	No change
English Heritage	We welcome the description of the historical development of Overton. However, we would welcome greater reference to the heritage assets in the parish: 56 listing entries in the parish (not 42 as stated on page 14 of the Plan), including (highly unusually) three grade I structures at Berrydown Court and four grade II* buildings (the barn to the south of South Litchfield Grange, the chapel on Station Road in Quidhamton, the Church of St Mary and Court Farmhouse), six scheduled monuments and one registered historic park and garden (Laverstoke Park).	Agreed	Now written into 'About Overton' section
English Heritage	When and why was the Conservation Area designated (i.e. what is its special architectural and historic interest). Are there any pertinent issues from the Character Appraisal? Is there a list of locally important heritage assets? Information on non-designated assets, such as non-scheduled archaeological remains, is available from the local Historic Environment Record. We would also welcome reference to the Hampshire Historic Landscape Character Assessment.	Noted	Reference included to Conservation Area; otherwise no change
English Heritage	English Heritage considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. We therefore suggest a characterisation study as a precursor to neighbourhood plans as such a study can help inform locations and detailed design of proposed new development, identify possible townscape	Noted	Key aspects covered within Conservation Area Appraisal and VDS

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	<p>improvements and establish a baseline against which to measure change. We promote the use of characterisation toolkits such as “Placecheck”, “Understanding Place” or the Oxford Toolkit, links to which can be found in the appendix to this letter.</p> <p>The preparation of the Neighbourhood Development Plan offers the opportunity to harness a community’s interest in the historic environment by getting them to help add to the evidence base, perhaps by undertaking historic characterisation surveys or creating and or reviewing a local heritage list.</p>		
English Heritage	We note that the weaknesses do not include any relating to the condition of the historic environment or the character of Overton. If there are indeed no such issues (and there are indeed no higher grade designated assets on the (2014) English Heritage at Risk Register) then this is of course to be welcomed. However we wonder if there has been any assessment of the condition of Grade II assets or local heritage assets (if they have been identified) and of whether the character of the conservation area and general character of the village is being maintained or slowly degraded by inappropriate developments.	Noted. Listed buildings in private hands; no designated assets known to be at risk; site selection has taken into account proximity to historic assets; Local Plan takes account of Conservation Area; policies in plan aim to conserve and enhance heritage assets	No change
English Heritage	We note that the Vision for the Plan set out page 12 has no specific reference to the historic environment of the parish, nor is there a specific objective relating to the historic environment, even though respecting the setting of listed buildings, especially the four grade II* listed buildings, is identified as a key issue. We therefore feel that one of the objectives of the Plan should be to conserve and enhance the heritage assets in the Plan area.	Word ‘Heritage’ is in the vision; no specific objective as covered by Local Plan policies	No change
English Heritage	However, we welcome Objectives LB1, LB2 and E2 (although this could be expanded to include all designated and non-designated heritage assets, not just the Conservation Area, and we are not clear why this is under “Enjoyment” – a heading of “Environment” would seem more appropriate. Also see comment below).	Noted	Policy E2 amended to remove word ‘designated’; expand to include heritage assets ‘in parish’ (not just Conservation Area)
English Heritage	We welcome Policy LB1 and E2 (although the latter could include non-designated assets as well) . However Objective E2 as set out on page 26 differs from that set out on page 19 (we prefer the version on page 26 as that on page 19 only refers to the Conservation Area). As with the version of the Objective on page 19, we do not understand why Policy E2 is under “Enjoyment”.	Noted	Inconsistency corrected
English Heritage	We note the assessment criteria for housing site assessment on page 29. Whilst we welcome the specific reference to the setting of listed buildings, the methodology for assessing impact on the significance of listed buildings is different to that for assessing the impact on landscape. We are surprised that there is no criterion relating to the conservation and enhancement of the Conservation Area and its setting.	Noted	Objective E2 wording modified to include setting
English Heritage	As regards the proposed housing sites, according to our records, none contain any designated heritage assets except Site B: Land East of Court Drove, the south end of which, as shown on the map, extends into the Conservation Area (the SA Report fails to recognise this) . Particular care will need to be taken with the design and form of any development of this site in order not to detract from the special interest of the Conservation Area and its setting (with reference to the Character Appraisal). The indicated employment site lies opposite the Conservation Area and any development here should respect the setting of the Area.	Agreed	Site specific policy to include setting with respect to Conservation Area
English Heritage	We note that the Plan includes three reserve sites. Site M: W of Vinn’s Lane, is close to three grade II listed structures at its north-east corner (although not quite adjacent as stated in the SA report) and any development here should have regard to their setting. Site PB:	Noted	Reserve sites M & PB no longer allocated within

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	Popham Beacons is adjacent to the Popham Beacons round barrow cemetery (in addition, incidentally, to also being in a rather unsustainable location in terms of accessibility) and depending on the exact location and form of any proposed dwellings, the development of this site may not be acceptable in terms of impact on the setting and significance of the cemetery.		NP
English Heritage	The Hampshire Historic Environment Record and Hampshire County Archaeologist should be consulted for potential archaeological interest of any of the proposed sites, particularly if any of the identified sites lie within an Area of (High) Archaeological Importance. The Hampshire Historic Landscape Character Assessment should also be consulted for the more isolated allocated sites at Willesley Warren and Ashe Warren (which also appear to be rather unsustainable locations in terms of accessibility and within the North Wessex Downs AONB).	Noted	Sustainability Appraisal conducted for individual sites. Sites WW and AW no longer allocated within NP
English Heritage	We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in Overton parish, please do not hesitate to contact us.  We wish you success with your Neighbourhood Plan.  Thank you again for consulting English Heritage.	Thank you; meeting held with EH now HE.	
HCC	Hampshire County Council, as Minerals and Waste Planning Authority, recognises that the neighbourhood plan falls within the administrative area of Basingstoke and Deane Borough Council. The following response has been prepared on the basis of the implementation of the Hampshire Minerals and Waste Plan (2013) which was adopted by Hampshire County Council. It was prepared in partnership with Basingstoke & Deane Borough Council.  Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that areas covered by a plan contain safeguarded minerals resources or existing safeguarded or planned minerals or waste sites. It is therefore important that, when preparing a neighbourhood plan, these issues are taken into consideration.  Mineral resources, as well as safeguarded minerals and waste sites, are set out in a Mineral Consultation Area (MCA) which is issued by the County Council and sits alongside the adopted Hampshire Minerals & Waste Plan. The MCA helps to ensure that non minerals or waste development do not needlessly sterilise viable mineral resources and that development does not negatively impact the operation of existing minerals or waste sites. More information on this is available on the HCC website: <a href="http://www3.hants.gov.uk/mineralsandwaste/planning-policy-home/mwsafeguarding.htm">www3.hants.gov.uk/mineralsandwaste/planning-policy-home/mwsafeguarding.htm</a> . It is important that any neighbourhood plan does not conflict with the adopted HMWP's policy objectives.  Hampshire County Council would like to take this early opportunity to advise that consideration should be given to addressing impacts of potential development proposals on areas of potential viable mineral resources if development proposals come forward.	Noted	No action
HCC	<b>Site K: W of Pond Close:</b> Although this site was identified in scenario C for potential housing allocations and not a preferred scenario the County Council would take the opportunity to advise that this site overlies safeguarded mineral resources as identified through Policy 15 – mineral resources - of the Hampshire Minerals and Waste Plan, October 2013.	Noted; clay mineral area is in extreme NW corner of site according to HCC map	Site K no longer allocated
HCC	<b>Site M: W of Vinn's Lane:</b> This site was not identified within any of the three scenarios although is listed a 'Reserve site' for 30 dwellings in the event that preferred allocated sites cannot be delivered. This site also overlies existing mineral resources and has the potential to again conflict with Policy 15 – mineral resources - of the adopted Minerals and Waste Plan, October 2013.	Noted ; clay mineral area in SE corner of site	Site M no longer allocated

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	<p>If either of these sites are to be taken forward for development in the future, it is recommended that the developer prepares a Minerals Assessment Report. It would be most beneficial to the developer if this was submitted to the County Council prior to submission of any application to allow for early discussions to take place. The report should broadly address key issues including:</p> <ul style="list-style-type: none"> <li>• Site setting – Location, access, site description, geology and constraints;</li> <li>• Planning status in respect of minerals safeguarding</li> <li>• Policy context (both national and local), Mineral safeguarding Area;</li> <li>• Constraints upon prior extraction – <i>inter alia</i> previous mineral working, hydrology of area, utilities and market issues (viability and/or quantity of resource present).</li> </ul> <p>The neighbourhood plan could helpfully refer to this requirement for a Minerals Assessment report.</p>		
HCC	<p><b>Objective E3</b> Hampshire County Council has a responsibility for countryside access. Whilst the County Council welcomes the Overton Neighbourhood Plan's identification of Objective E3, 'To encourage access to the countryside for walkers', the County Council is of the opinion that this should be extended to include cyclists and wherever possible equestrian users, in order to extend the benefits to a wider range of users. This would be in line with priority issues within the emerging <a href="#">Countryside Access Plan 2015-2025</a>, including:</p> <ul style="list-style-type: none"> <li>• Getting to the countryside from urban areas</li> <li>• Connectivity of routes</li> <li>• Meeting the needs of all users</li> <li>• Joint working with other countryside interests</li> </ul> <p>Hampshire County Council requests that a 'default' for the creation of any new right of way or other countryside access route should be for these to be multi-purpose i.e. to provide for cyclists as a matter of course and for horse riders wherever possible and appropriate. This would allow greater accessibility for all users, including those with limited mobility.</p>	Noted; no bridleway, only multi use paths	Cyclists added
HCC	<p>Although <b>Objective H3</b> refers to sustainability, the County Council considers that supporting Policy H3 (and therefore the plan) does not adequately address the climate change aspects of "sustainable development" or make any reference to the outcomes required by paragraphs 94-97 of the NPPF.</p> <p>The County Council requests that policy H3 is therefore amended to incorporate the additional wording as set out below:</p> <p><b>Objective H3: New housing will be sustainable and efficiently conserve natural resources, restrict pollution and promote biodiversity.</b></p> <p>Policy H3 Housing developments will be permitted providing they conform to Local Plan Policies, and</p> <ol style="list-style-type: none"> <li>1. Developers agree to be guided by Overton Biodiversity Society<sup>16</sup> and Hampshire and IOW Wildlife Trust in their planting plans, make provision for ongoing habitat management and create/enhance wildlife corridors.</li> <li>2. They conform to BDBC Green Infrastructure Strategy, 2013<sup>70</sup> regarding green areas.</li> <li>3. <u>They demonstrate best practice in energy efficiency</u></li> <li>4. <u>They include decentralised, low-carbon or renewable energy generation unless it is proven impossible to do so.</u></li> </ol>	Noted	Policy H3 Energy efficiency and generation added
HCC	<p><b>Policy H5</b> As Lead Local Flood Authority, Hampshire County Council considers that Policy H5 should be amended to refer to SuDS (Sustainable Drainage Systems). Policy H5 is cited as evidence that the plan meets objective 10 of the NPPF (Meeting the challenge of climate change, flooding and coastal change). Hampshire County Council does not agree that policy H5 adequately addresses objective 10</p>	Noted	Policy H5 now H4 and SuDS included

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	<p>of the NPPF – particularly with reference to paragraphs 99-100.</p> <p>The County Council requests that Policy H5 is therefore amended to incorporate the additional wording as set out below:</p> <p><b>Objective H5: Housing developments must be fully supported by adequate infrastructure.</b></p> <p>Policy H5 Development proposals will be supported providing</p> <ol style="list-style-type: none"> <li>1. A viable utilities plan is in place for adequate capacity of the sewerage system for the whole village prior to connection of any new development to the sewerage system as a condition for approval.</li> <li>2. <u>The principles of Sustainable Urban Drainage are applied</u></li> <li>3. Access roads to a site are adequate for existing traffic plus the new traffic the site will generate.</li> </ol>		
Natural England	Many thanks for the above consultation. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.	Noted	
Natural England	<p><b>Plan policies.</b></p> <p><b>Landscape impacts.</b> Natural England has concerns with respect to the evidence supporting the site allocations, in terms of impacts on the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The NPPF requires land to be allocated of least environment value (para 110), and that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty (para 115). The plan allocates a number of sites that have the capacity to have significant impacts on the North Wessex Downs Area of Outstanding Natural Beauty (AONB), both within and without the AONB itself. In the absence of a landscape assessment of each of the sites liable to impact on the AONB (and arguably all such sites), it cannot be ascertained that the allocated land is of least environmental value, and does not permit great weight to be given to the AONB. The sites policy allocating sites is thus liable not be consistent with the NPPF and thus liable to be unsound. We advise that such an assessment is undertaken, and due weight given to its findings.</p>	Noted; Landscape Capacity Assessment conducted for each site, available as Reference 66 in pre-submission plan; site WW no longer allocated; AW for key workers	<b>Landowner and NW Downs AONB negotiation regarding location and acceptability for site AW</b>
Natural England	<p><b>Development specifications.</b> You may also wish to consider if it is appropriate to include more detailed development specifications for the sites (in particular the larger sites). For example, it may be appropriate to specify a new public right of way to run through the east and southern edges of site F and specify the land use within the remainder of this site.</p> <p><b>Policy SS3.</b> We are not sure whether policy SS3 is written as intended: 'Windfall' developments on previously developed 'brownfield' or unallocated sites with direct highways access will be permitted provided they comply with all the other policies in this Plan. This appears to be highly permissive, allowing development on any site with direct highways access (provided compliance with other plan policies), and you may wish to review this policy.</p>	Noted	<b>Policy SS3 removed.</b>
Natural England	<p><b>Sustainability Appraisal.</b></p> <p>The Summary of the appraisal of the Draft Plan states (regarding landscape): Page 2 of 2</p> <p>8.5.1 Two of the proposed allocations, <b>Site WW: Willesley Warren S</b> and <b>Site AW: Ashe Warren</b>, are located within the North Wessex Downs AONB. The remaining sites are located outside of the AONB. Potential effects from the two sites within the AONB will be limited by the small scale of development proposed at each site (c.5 dwellings). While this is true, this does not appraise the impacts of these allocations, nor does it consider the impacts on the AONB of sites outside the AONB, nor are there considerations of not allocating these two sites. The more detailed appraisal says:</p>	Noted.	Sustainability Appraisal conducted for individual sites. Sites WW and AW removed from plan.

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	<p>In relation to the North Wessex Downs AONB, all three scenarios allocate two sites (Site WW: Willesley Warren S and Site AW: Ashe Warren) within the AONB. Whilst both of the allocations are small in scale (comprising c. 5 dwellings each), these have the potential to lead to adverse effects on the integrity of the AONB without the implementation of careful design and layout and the integration of appropriate landscaping.</p> <p>The remaining sites proposed through the scenarios are located outside of the AONB. In this context the larger-scale allocations proposed through the three scenarios are located to the south of Overton, on the far side of the village from the AONB. This will help limit effects on views from the AONB.</p> <p>In terms of the first underlined text, it has not been shown that even with “the implementation of careful design and layout and the integration of appropriate landscaping” these sites may lead to adverse effects on the integrity of the AONB.</p> <p>In terms of the second underlined text, “limiting the effects on views from the AONB” is not sufficient analysis for the Sustainability Appraisal, as the residual impacts may still be significant.</p> <p>We advise that the Sustainability Appraisal, as it currently stands, does not provide a sufficiently robust assessment to justify the allocations in the Plan.</p>		
Natural England	<p>In other regards, Natural England does not consider that this plan poses any likely significant risk to internationally or nationally designated nature conservation or landscape sites and so does not wish to make specific comments on the plan.</p> <p>The lack of more detailed comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may make comments that will help you to fully take account of the natural environment in the plan-making process.</p> <p>If, as you develop your plan, you consider that it will significantly impact on designated nature conservation sites or protected species or has other significant impacts on the natural environment then you should consult Natural England again.</p>	Thank you	No action
Turley	<p>These comments are submitted to the Overton Pre-Submission Neighbourhood Development Plan on behalf of my client, Bargate Homes Ltd, and in respect of their interest on land west of Sapley Playing Field.</p> <p>Fundamentally, my client welcomes the identification of the site within <b>Policy SS1</b> for the provision of 55 dwellings and this is strongly supported.</p> <p>The site is collectively assessed within the Plan and accompanying sustainability appraisal as part of ‘Scenario A’, forming one of three scenarios for delivering 150 houses, based on the strong endorsement through consultation for building on a number of smaller sites (as opposed to one large site).</p> <p>Scenario A was supported by 39% of those submitting a preference at the exhibition on 24th January, with the majority also identifying Scenario A as their second preference.</p> <p>The Sustainability Appraisal of the Overton Neighbourhood Plan prepared by AECOM consultants identified Scenario A as performing best against a range of different sustainability themes, including bio-diversity, historic environment and landscape, and transportation.</p>	Noted.	No action required.
Turley	<p>My client would make the following additional comments and observations on the Plan.</p> <p>Conformity with the Local Plan</p> <p>The National Planning Policy Framework provides important guidance in the preparation of Neighbourhood Plans. It highlights that “neighbourhoods should develop plans that support strategic needs, including policies for housing...” (paragraph 16), and “Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan...Neighbourhood Plans should reflect these policies and neighbourhoods plan positively to support them.” (paragraph 184). 2</p> <p>It is unfortunate therefore, and no fault of the Parish Council, that the submitted Basingstoke &amp; Deane Local Plan 2011-2029, on which the Neighbourhood Plan is based, has not been considered by the Local Plan Inspector within his letter dated 21st October 2014, to provide a sufficiently robust platform for delivering the housing requirements that the Borough needs.</p> <p>This has direct consequences for the ability of the Neighbourhood Plan to demonstrate that its policies will be in general conformity with the Local Plan (as this will inevitably be subject to change - see below), and therefore meet the required tests of soundness.</p>	Policies from both the existing and emerging local plan are referenced to ensure the NP complete and can be adopted before Local Plan approved, if necessary.	No change

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Turley	<p>Housing Requirements</p> <p>As a consequence of the preliminary recommendations of the Local Plan Inspector set out above, the Council have subsequently agreed at the Full Council meeting on 26th March 2015 that an increased housing requirement of 850 dwellings per annum would be included within the Plan (as opposed to the submitted housing figure of 754 dpa).</p> <p>Policy SS1 of the Plan – Scale and Distribution of New Housing will now been amended to refer to ‘within the period 2011 – 2029, the Local Plan will make provision to meet 15,300 dwellings and associated infrastructure’.</p> <p>In related committee reports to the Full Council meeting, officers have advised that this enhanced requirement will be made up of an additional greenfield allocation at Hounsme Fields, Basingstoke (BAS133) which will be allocated for approximately 750 homes between 2017/18 – 2028/29, a recent planning permissions (70 units at Worting Farm), and an additional 175 from urban/brownfield opportunities following a further review of potential, and using some of the previous contingency from the submitted Plan</p> <p>Officers have considered both increasing housing numbers through Neighbourhood Plans, and within the settlements of Bramley, Kingsclere, Oakley, Overton and Whitchurch. However, officers are of the opinion that there is no evidence to support the delivery of a higher housing requirement within Neighbourhood Plans.</p> <p>However, the approach to providing for the additional housing requirement has yet to be independently tested through the Examination process, for example, no evidence is presented to justify whether the additional 175 brownfield opportunities are genuinely deliverable in accordance with the relevant Framework tests. There remains a very real possibility that further allocations will be required to be considered within Overton through the Neighbourhood Plan process.</p>	The NP has been developed in response to the requirement for 150 dwellings. We have received assurance from B&DBC that no parishes currently actively developing a NP will be allocated additional housing.	No change
Turley	<p>My client therefore welcomes the principle that the Sustainability Appraisal has tested two further options for additional housing provision over and above the sites identified in Policy SS1 (paragraphs 6.2.16-6.2.20 and Table 6.7).</p> <p>However, both options are based on assumptions about the level of this additional requirement. Equally significantly, Option A includes some but not all of the sites originally shortlisted for consideration at the January Exhibition (for example land West of Pond Close is not tested) based on an untested assumption that only 45 dwellings will be required; whilst Option B (North Fields/Land west of Kingsclere Road) includes a site based on an untested requirement figure of 275 dwellings, and significantly a site that was not shortlisted nor consulted by the community at the January Exhibition. 3</p> <p>Option B/North Fields was considered within the Council’s March 2014 Site Assessment Report as <i>“having a significant impact on the landscape character and with a number of constraints which would not be easily mitigated, including the visual prominence of the site and impact on nearby listed buildings and Conservation Area which have resulted in a negative assessment for both landscape impact, relationship to settlement and impact on historic or cultural heritage/landscape.”</i></p> <p>The Neighbourhood Plan should await clarification of the approach to the delivery of the additional housing requirement in order that a proper assessment of the delivery of ‘additional’ sites can be considered.</p>	The sustainability appraisal looked at reasonable alternatives, not additional dwellings.	No change
Turley	<p>Affordable Housing</p> <p>For similar reasons, it is important that <b>Policy H1</b> (requiring a minimum of 40% affordable homes on all sites of 10 or more dwellings) is consistent with the emerging policy of the Local Plan. As yet this level of provision has yet to be formally tested through the Local Plan Examination to confirm it is viable. My client does not object to the principle, but would recommend any policy cannot be included within the Neighbourhood Plan until such time as the related local Plan policy can be accorded significant weight.</p>	Due to the overwhelming feedback from the village regarding the lack of affordable housing the NP includes a minimum of 40% irrespective of B&DBC’s emerging local plan.	No change
Turley	The policy will also need to be updated to reflect the recent Government changes to national policy with regard to Section 106 planning obligations to reduce the threshold for providing affordable housing to 10 units or less (or less than 1,000m2 combined floorspace).	Noted.	<b>Policy H1(1) revised accordingly</b>
Turley	Phased Delivery	Noted.	Phasing to be within

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	My client recognises the community has placed considerable value in ensuring that development is appropriately phased so that new residents can integrate with the existing residents. However, the phasing of development set out within <b>Policy H2</b> is considerably less than would normally be expected to be provided in the construction of sites (averaging less than 20 units per year). By comparison, normally about 40-50 houses are provided per year on larger sites. Such a reduced scale of construction may not be viable. My client would therefore request that the phasing set out in the Policy be amended to refer to 150 dwellings (or whatever additional requirement emerges through the Local Plan process - see above), be phased from 2018 onwards.		time ranges, not per year.
<b>Turley</b>	Design Brief My client is supportive of ensuring early and detailed involvement of the Parish Council in the preparation of any planning application. However, the requirement in Policy SS2 for the submission of a Design Brief is effectively duplicating the requirement for a Design and Access Statement, which needs to be prepared as part of any application submission in any case. Therefore, it is suggested that the Policy be re-worded to require early consultation with the Parish Council, to include submission of a draft Design & Access Statement, on all appropriate schemes.	Noted.	<b>Policy SS2 amendment made to clarify requirements</b>
Turley	My client would be more than happy to discuss any of the above comments in more detail, and look forward to working with the Parish Council to delivering the Neighbourhood Plan and its related objectives.	Thank you.	
Romanina	I am writing with comments on the Pre-Submission Neighbourhood Development Plan (February 2015) on behalf of Romanina Real Estate Inc., the owners of Site F, South of Two Gate Lane. These comments should be taken in the context of the positive working relationship which has been developed between the Parish Council's Neighbourhood Plan Group and Moundsmere Estate Management and ourselves as joint agents for the landowners, which we intend to continue.	Noted.	No action required.
<b>Romanina</b>	Policy H1 – criterion 4 – “priority access” should be explained. With regard to new private housing, if this means that there should be an initial marketing period during which parish residents and people with local connections will be given an exclusivity period for agreeing purchases, then that is what it should say.	Noted	Policy revised.
<b>Romanina</b>	Policy H2 – the proposed phases refer to the “building” (or completion) of dwellings at Overton Hill (2015-2018) but to the “approvals of housing developments” (or planning permissions for sites) allocated in the Neighbourhood Plan in two phases (2019-2024 and 2025-2029). There is a time lag between the granting of approvals / permissions and the completion of developments, so reference to “approvals” should be deleted. Instead, all phasing should relate to the timing of the completion of dwellings. Section 5 of the Neighbourhood Plan allocates sites for 154 dwellings in total, but the proposed phases in H2 only deliver 150 dwellings. The two proposed phases for allocated sites are not supported. The first phase for allocated sites should commence in 2016, not 2019. Moreover, it is not clear how the dwelling numbers in the two proposed phases (80 and 70) have been arrived at or whether the developments will be viable on this basis.	Noted.	Timing of phasing revised and wording to refer to completions, not approvals.
<b>Romanina</b>	In the case of Site F, a new access road and new drainage and other infrastructure will need to be provided at the outset, and the quantum of development required to deliver this infrastructure is not yet clear. It may be that the development is only viable if 70 dwellings are constructed. In any event, the phasing should facilitate construction commencing on Site F in 2016	Noted.	Policy H4 on infrastructure revised.
<b>Romanina</b>	Policy H5 – criterion 1 – any development should only have to demonstrate adequate sewerage capacity for the additional foul drainage to be generated by that development.	Noted.	Policy H5 revised to cover this.
<b>Romanina</b>	Section 5 : The Allocated Sites – with regard to Site F, the site areas quoted and blue-edged land area illustrated are both assumed to have been taken from the illustrative material displayed by Taylor Wimpey at the public consultation event on 24 January, 2015, more specifically the Scenario A illustrative layout drawing. This was an initial feasibility layout describing one way in which a 70 dwelling scheme could be delivered on part of the site. Therefore, that drawing should not be used to define a development area in a prescriptive way because that was not intended. Rather, the plan should indicate a more conceptual development area on the northern part of the site, including an indicative access point (perhaps shown as an arrow) from London Road.	Noted.	<b>Site specific policies to include indicative development area and access points.</b>
Romanina	I trust that these comments are helpful and I look forward to discussing them with the Neighbourhood Plan Group in due course. Please confirm your receipt of this email.	Thank you.	

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Gladman	<p>Gladman Developments Ltd (Gladman) specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs. Every effort should be made to deliver both the housing and business needs of an area, whilst responding positively to the wider opportunities for growth.</p> <p>This representation is in response to the Overton Neighbourhood Plan pre-submission version, to which we understand the Parish Council is currently seeking comments. Through this response we have sought to clarify the role that the neighbourhood plan should play in supporting the wider development needs and strategic policies for the local area set out in the emerging Basingstoke and Deane Local Plan, whilst highlighting areas where the draft document's proposals would benefit from further work or justification. Gladman look forward to commenting on a further draft of the neighbourhood plan proposals again in the near future.</p>	Noted.	No action required.
Gladman	<p><b>Role of Neighbourhood Plans</b></p> <p>The National Planning Policy Framework (The Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out requirements for the preparation of neighbourhood plans and the role they must play in meeting the development needs of the local area. The guidance set out in the Framework has now been supplemented by the neighbourhood planning chapter contained in Planning Practice Guidance (PPG).</p> <p>Paragraph 16 of the Framework specifically sets out the positive role that Neighbourhood Plans should play in meeting the development needs of the local area. Its states that:</p> <p>"The application of the Presumption (In Favour of Sustainable Development, set out in paragraph 14 of Framework) will have implications for how communities engage in neighbourhood planning. Critically it will mean that neighbourhoods should:</p> <ul style="list-style-type: none"> <li>☐ Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;</li> <li>☐ Plan positively to support local development, shaping and directing development in their area that is outside of the strategic elements of the Local Plan"</li> </ul> <p>Further guidance on the relationship between Neighbourhood Plans and the strategic policies for the wider area set out in a Council's Local Plan is included in paragraph 184 of the Framework:</p> <p>"The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date plan is in place as quickly as possible. Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to support them".</p> <p>Before a Neighbourhood Plan can proceed to referendum in must be tested against the Neighbourhood Plan Basic Conditions, set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended by section 38A of the Planning and Compulsory Purchase Act 2004) and detailed in paragraph 065 of the Neighbourhood Plan PPG. These Basic Conditions are:</p> <p>(a) Having regard to national policies and advice contained in guidance issued by the</p>	Noted.	No change.

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	<p>Secretary of State, it is appropriate to make the order.</p> <p>(b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order.</p> <p>(c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order.</p> <p>(d) The making of the order contributes to the achievement of sustainable development.</p> <p>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations, and</p> <p>(g) Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</p> <p>It is clear from the above requirements that neighbourhood plans must conform to national planning policies (basic condition (a) 'appropriateness') and the up-to-date strategic policy requirements (basic condition (e)) set out in adopted Local Plans. Neighbourhood Plans must take a positive approach to new development and should therefore not be used to prevent future sustainable growth opportunities from going ahead.</p>		
Gladman	<p><b>Basingstoke and Deane Emerging Local Plan</b></p> <p>The emerging Basingstoke and Deane Local Plan was submitted to the Secretary of State for Examination in October 2014. The Inspector wrote to the Council in October 2014 expressing serious concerns that the Local Plan as submitted may not provide a sufficiently robust platform for providing new homes in Basingstoke and Deane or an adequate strategy for delivering that objective. Following from these initial concerns an Exploratory Meeting was held in December 2014 to discuss these issues further.</p> <p>The Inspectors key concerns as mentioned above resulted in further work being carried out by the Council with regards to the Sustainability Appraisal and the Council's objectively assessed housing need for the borough.</p> <p>Gladman therefore question the ability of the ONP to be progressed at this time as the plan lacks credible and robust evidence base. Given the current status of the emerging Local Plan and the uncertainty over the final outcome of the strategic policies which will govern the borough. It cannot be certain that the Neighbourhood Plan will adhere to the up-to-date strategic policies and development requirements for the authority when the Council's Local Plan has yet to be tested at Examination. Although the neighbourhood plan section of PPG indicates that neighbourhood plans can be advanced before an up-to-date Local Plan, Gladman strongly submit that it would be more appropriate for the Parish Council to postpone further work on the ONP until the emerging Local Plan and its supporting evidence base has been tested and found sound at Examination. If the Neighbourhood Plan is advanced in its current form and the strategic policies and development requirements for the village change, then the work on the ONP is likely to be abortive. If progressed this would fundamentally be contrary to the requirements set out in the Framework as to how neighbourhood plans should be prepared, and would fail basic conditions (a) and (e).</p>	<p>Our plan will be tested according to the saved policies of the adopted local plan. Whilst we take note of the policies of the emerging local plan, a NP is not required to be in conformity with emerging plan policies not yet approved.</p>	<p>No change.</p>

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Gladman	<p><b>Overton Neighbourhood Plan</b></p> <p>Gladman have reviewed the suite of policies proposed through the draft Neighbourhood Plan. In this regard we note that there are a number of instances which need to be addressed prior to the ONP advancing. A number of policies are considered to be more appropriately dealt with at the development plan level for this reason we have recommended the removal of such policies as they are simply a repetition of policy contained in the emerging Local Plan which has yet to be successfully tested at Examination.</p> <p><b>Policy LB1</b></p> <p>Policy LB1 seeks a number of design provisions to be met with regards to future development proposals. Gladman recognise the benefits that high quality design can have on the delivery of future sustainable development. New development can often contribute to the local character of an area through the effective use of high quality design.</p> <p>However, the ONP needs to ensure that its design policies are not used as a mechanism to constrain the ability of residential development coming forward, this is in accordance with paragraph 59 of the Framework.</p> <p>The Overton Village Design Statement should be updated in light of more up-to-date national policy requirements and guidance. The Parish Council should ensure that guidance contained in this document does not place overly prescriptive design measures that could affect the viability and the delivery of future sustainable development opportunities coming forward. This should be executed with strict accordance to paragraph 173 of the Framework</p>	Recent consultations confirm the recommendations of the village Design Statement as regards landscape and design.	No change.
Gladman	<p><b>Policy H1</b></p> <p>This policy seeks to establish a range of measures, including affordable housing provision, tenure mix and priority to be given to local people for affordable housing.</p> <p>Gladman consider that this is more appropriately dealt with at the development plan level, based on up-to-date evidence. We therefore recommend the deletion of policy H1.</p>	Neighbourhood Planning is strategic in nature and must respond to local needs	No change.
Gladman	<p><b>Policy H2</b></p> <p>Policy H2 states all new housing development above 30 dwellings will be phased across the plan period in three stages.</p> <p>Until the emerging Basingstoke and Deane Local Plan has been tested at Examination it will not be possible to ascertain how much housing Overton will need to accommodate through the Neighbourhood Plan. Gladman submit that Policy H2 is inconsistent with the requirements of the Framework, if a development is considered sustainable and located in a suitable location it should come forward without delay, this is in accordance with the presumption in favour of sustainable development.</p>	Noted.	Policy H2 revised regarding phasing.
Gladman	<p><b>Policy H4</b></p> <p>This policy seeks to ensure that all new developments will be supported provided they are accredited by Secure by Design standards. Whilst the application of security standards is an important consideration for future development proposals, these can often be incorporated through the use of high quality design. There is no requirement in national policy that the measures contained in Secured by Design must be performed.</p> <p>A policy requirement such as this would be contrary to the explicit requirements of paragraphs 59 and 173 of the Framework.</p> <p>Gladman recommend the deletion of policy H4.</p>	There is nothing in National Policy to say we should not include 'Secured by Design'	Policy H4 now revised into policy H1.
Gladman	<p><b>Policy L1</b></p>	Noted	Policy L1 revised.

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	Gladman are concerned that policy L1 which states development which offers opportunities for the expansion of nursery school facilities will be supported. However, the level of development envisaged by the Parish Council will be insufficient to provide the necessary financial contributions required to implement this policy. Gladman recommend that ONP allocates additional land for residential development to ensure this policy is delivered.		
Gladman	<b>Policy T2</b> This policy seeks to obtain developer contributions for the creation of parking opportunities through the village and upgrading community parking assets. Gladman note paragraph 204 of the Framework which states planning obligations should only be sought where they meet all of the following tests: - 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. The approach taken by this policy is therefore inconsistent with the requirements of paragraph 204 of the Framework and should be removed from the ONP.	NPPF Paragraph 204 concerns LPA obligations placed on developers as a condition of granting planning, not parking.	No change.
Gladman	<b>Policy E2</b> Policy E2 states development will be permitted provided it conforms to the emerging local plan policies and the management plan for the North Wessex Downs AONB, River Test SSSI and other various designated heritage assets. Gladman consider this is more appropriately dealt with at the development plan level and should be removed from the ONP.	Policy E2 specifies protected environmental areas of Overton.	No change.
Gladman	<b>Sustainability Appraisal</b> Gladman acknowledge the Parish Council has undertaken a Sustainability Appraisal to identify, describe and evaluate the likely effects on the environment of implementing the plan and all reasonable alternatives. Gladman note that the Parish Council has tested the ONP against two higher growth targets. These are as follows: - Option A: seeks to deliver an additional 45 dwellings through a number of reserve sites currently proposed for the Neighbourhood Plan - Option B seeks to deliver an additional 275 dwellings. Gladman question the approach taken by the Parish Council which seeks to deliver the level of housing identified by the emerging Local Plan. Both options would have a positive effect on the local community. The SA states that option B would support the delivery of a wider range of housing types and help increase affordable housing in Overton, which is a key issue that needs to be addressed. The option would also offer an increased potential to support the economic viability and vitality of the village and deliver enhanced contributions to community infrastructure.	Reserve sites included in pre-submission plan in case any allocated sites proved not deliverable. Option B did not seek to deliver 275 homes. The NP seeks to deliver the 150 homes required by the emerging local plan.	No change.
Gladman	Gladman submit that new development would offer the opportunity, where necessary, to improve the ecological values of existing biodiversity assets and can often be integrated into development proposals through effective design measures. This helps maintain their role as part of both the local and wider area's biodiversity network. Gladman consider it may be appropriate for the Parish Council to revisit its SA in light of the above. Development of the scale identified by option b would have a significant positive effect on the demographic role of Overton and its ability meet local and wider area housing needs.	Ecological points noted.	No change.

**Responses to pre-submission Neighbourhood Plan from statutory consultees and external bodies**  
2015

updated 23 June

Name	Comment	Response to comment	Proposed change to NP
Gladman	<p><b>Conclusion</b></p> <p>Gladman recognise the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear that neighbourhood plans must be consistent with national planning policy and the up-to-date strategic requirements of the wider local authority area. If a neighbourhood plan does not meet the neighbourhood plan basic conditions then there is a real risk that the plan will fail at Examination and therefore unable to proceed to referendum.</p> <p>Through these representations, Gladman has highlighted a number of concerns with the plan in its current form. In a number of instances the neighbourhood plan's policies appear to be inconsistent with national planning policy and could act to preclude the ability of future sustainable development proposals coming forward.</p>	Need to conform with National Policy noted; this has been taken into account throughout the development of the plan.	No change.
Gladman	<p>Gladman also question the ability for the ONP to be progressed at this time, Basingstoke and Deane Borough Council have submitted their emerging Local Plan for Examination. However, the Inspector has found fundamental flaws with regards to the Council's Sustainability Appraisal and their assessment of housing needs. Given the unclear status of the emerging Local Plan, Gladman question whether the ONP can be progressed ahead of the Local Plan as it has yet to be determined at examination whether the strategic policies and spatial distribution for the borough is sound. If it is found that Overton is required to accommodate an additional level of housing then work on the neighbourhood plan so far is likely to be abortive, and the document will need to be reviewed. We therefore suggest it may be more appropriate if the Parish Council postponed any further work on the ONP until there is greater certainty on the strategic policy framework for the wider area.</p>	Policies from both the existing and emerging local plan referenced to ensure NP complete and can be adopted before Local Plan approved, if necessary. The NP has been developed in response to the requirement for 150 dwellings. We have received assurance from B&DBC that no parishes currently actively developing a NP will be allocated additional housing.	No change.
Gladman	I hope you have found these representations constructive, if you require any further assistance please do not hesitate to contact myself or a member of the team.	Thank you	