

Overton Neighbourhood Plan Submission (Regulation 16)

Representations

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BSGD-C12-OV25-1	Roger Moss		No

Title: Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

All

BSGD-C12-OV25-1	Roger Moss		No
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Title: Q2. Do you support or oppose that part of the neighbourhood plan?

Q2. Do you support or oppose that part of the neighbourhood plan?

Support

BSGD-C12-OV25-1	Roger Moss		No
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Title: Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

An excellent plan that should protect and enhance the future for Overton

BSGD-C12-OV25-1 Roger Moss No

Title: Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

None

BSGD-C12-OV25-1 Roger Moss No

Title: Q5. If a public hearing is necessary would you like to participate?

Q5. If a public hearing is necessary would you like to participate?

Yes

BSGD-C12-OV25-1 Roger Moss No

Title: Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

It is important that the examiner hears the opinions of real people that live in the village that this plan covers!

BSGD-C12-OV25-1

Roger Moss

No

Title: Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Yes

BSGD-C12-OV25-2 Richard Oram No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

Housing and Development

BSGD-C12-OV25-2 Richard Oram No

Title: Q2. Do you support or oppose that part of the neighbourhood plan?

Q2. Do you support or oppose that part of the neighbourhood plan?

Support completely

BSGD-C12-OV25-2 Richard Oram No

Title: Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

The Mill site provides a brown field site that can accommodate the current housing demand placed on Overton and avoid further development on green field sites.

BSGD-C12-OV25-2 Richard Oram No

Title: Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

None

BSGD-C12-OV25-2 Richard Oram No

Title: Q5. If a public hearing is necessary would you like to participate?

Q5. If a public hearing is necessary would you like to participate?

Yes.

BSGD-C12-OV25-2 Richard Oram No

Title: Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

As chair of the ONDP committee I feel I can offer insight into how the plan was arrived at.

BSGD-C12-OV25-2

Richard Oram

No

Title: Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Yes

BSGD-C12-OV25-3 Bob Denny

No

Title: Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

A well presented and extremely detailed plan which I am in favour of.

BSGD-C12-OV25-3 Bob Denny

No

Title: Q5. If a public hearing is necessary would you like to participate?

Q5. If a public hearing is necessary would you like to participate?

Yes.

BSGD-C12-OV25-3 Bob Denny

No

Title: Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Not necessary but desirable as an interested individual.

BSGD-C12-OV25-3

Bob Denny

No

Title: Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Yes.

BSGD-C12-OV25-3

Bob Denny

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

General

BSGD-C12-OV25-3

Bob Denny

No

Title: Q2. Do you support or oppose that part of the neighbourhood plan?

Q2. Do you support or oppose that part of the neighbourhood plan?

I support the Overton neighbourhood plan.

BSGD-C12-OV25-4 Richard Cook No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

New access road

BSGD-C12-OV25-4 Richard Cook No

Title: Q2. Do you support or oppose that part of the neighbourhood plan?

Q2. Do you support or oppose that part of the neighbourhood plan?

Oppose

BSGD-C12-OV25-4 Richard Cook No

Title: Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

I feel compelled to convey my concerns regarding the request for a different entrance road for the Portal's development by the new neighbourhood plan and representations in person

I strongly believe that the proposed road exit onto the B3051 poses significant safety risks. This area is notorious for high-speed traffic, especially in what is referred to locally as the "mad mile," which creates a dangerous environment for both drivers and pedestrians. The footpath is inadequate and practically non-existent in places, and the narrow, almost humpbacked bridge contributes to the hazards, often littered with accident debris and vehicle scuffs along the brickwork with a blind hill at

one end and a blind bend at the other . Additionally, the Kingsclere Road has consistently been highlighted by Speed Watch for its speeding issues.

Conversely, utilizing the entrance along Station Road seems to be the perfect and most viable option, given the historical patterns of traffic movements and Number from the Mill – including staff, HGVs, and white vans etc – over the years with no major changes in traffic volume or new developments increasing the use of these roads

Moreover, creating an entrance on the B3051 would likely facilitate a rat run to avoid the village center, even directing traffic toward the A303 down unsuitable lanes , as witnessed during Carfest when satnavs directed visitors and caused chaos. This could also result in unexpectedly increased parking issues on the estate for residents as commuting patterns change upon returning to office work. Overton train station is an asset and has the local knowledge that it is free at present , attracting users not only from our village but from surrounding areas due to its speed to get to Basingstoke ,Reading ,Woking and London Waterloo

Lastly the effect a road in that position regarding its potential impact on the Site of Special Scientific Interest (SSI) and the Area of Outstanding Natural Beauty (ANOB). Given that our village has declared a climate emergency, I believe that both the council and parishioners should be challenging this not pushing for it

The road would not only affect these protected areas but also seems to promote further development in the area that has not been designated for such purposes. This could place the SSI at significant risk, which is something we must take seriously.

BSGD-C12-OV25-4

Richard Cook

No

Title: Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Removal of this form the plan

BSGD-C12-OV25-4 Richard Cook No

Title: Q5. If a public hearing is necessary would you like to participate?

Q5. If a public hearing is necessary would you like to participate?

Yes

BSGD-C12-OV25-4 Richard Cook No

Title: Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

To prevent a dangerous exit

BSGD-C12-OV25-4 Richard Cook No

Title: Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

No

BSGD-C12-OV25-5 Keely Gallagher No

Title: Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

Q6. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

N/A

BSGD-C12-OV25-5 Keely Gallagher No

Title: Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

No

BSGD-C12-OV25-5 Keely Gallagher No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

The brownfield Portals Mill site

BSGD-C12-OV25-5 Keely Gallagher No

Title: Q2. Do you support or oppose that part of the neighbourhood plan?

Q2. Do you support or oppose that part of the neighbourhood plan?

Support with conditions

BSGD-C12-OV25-5 Keely Gallagher No

Title: Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

I am concerned about access to and from the site. Access via Kingsclere Road past the station is along a partially unadopted road which is in very poor condition and with no footpath despite being well used by pedestrians. Station Road is narrow in places and does not have continuous footpaths. Neither could cope with the additional vehicles generated by construction or the resulting 400 homes. I would want to see the county fully adopt the road near the station and make improvements in advance of any work starting.

BSGD-C12-OV25-5 Keely Gallagher No

Title: Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

As above

BSGD-C12-OV25-5

Keely Gallagher

No

Title: Q5. If a public hearing is necessary would you like to participate?

Q5. If a public hearing is necessary would you like to participate?

No

BSGD-C12-OV25-6 Mark Winter No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

5.1 The VisionObjective 14: New dwellings should not adversely affect the River Test Site of Special Scientific Interest (SSSI), the River Test compensatory Special Area of Conservation (SAC) habitat nor the downstream Solent Maritime SAC and Solent & Southampton Water Special Protection Areas (SPA).

BSGD-C12-OV25-6 Mark Winter No

Title: Q2. Do you support or oppose that part of the neighbourhood plan?

Q2. Do you support or oppose that part of the neighbourhood plan?

Support

BSGD-C12-OV25-6 Mark Winter No

Title: Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

Q3. Please provide comments on that part of the neighbourhood plan you refer to in question 1.

Overton is situated in a river valley. As more and more development takes place on fields higher in the valley, the fields' ability to absorb rainfall is reduced to the point that water floods roads and low lying areas before washing directly into the River Test.

The sewage infrastructure in the village is overwhelmed to the point that several roads already experience sewage flowing on the road surfaces following heavy rainfall. This poses a serious threat to the health of, not only the population, but the River Test and locations downstream.

Continued over-development of areas above the village will make this worse and will make the objective to protect the river (Policy LEB3) unachievable.

BSGD-C12-OV25-6

Mark Winter

No

Title: Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Q4. Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Development should be considered only where the infrastructure can support the objectives.

BSGD-C12-OV25-6

Mark Winter

No

Title: Q5. If a public hearing is necessary would you like to participate?

Q5. If a public hearing is necessary would you like to participate?

No

BSGD-C12-OV25-6

Mark Winter

No

Title: Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Q7. Do you wish to be kept informed of the progress of the Neighbourhood Plan and are happy for us to contact you? We will notify you of the publication of the Examiner's Report and or of the 'Made' Neighbourhood Plan if you specify this below.

Yes

BSGD-C12-OV25-7

Anne Phillips

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (2)

A Phillips response_redacted.pdf

A Phillips email_redacted.pdf

BSGD-C12-OV25-8

Anna Thame

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

A Thame response_redacted.pdf

BSGD-C12-OV25-9

Bargate Homes

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (5)

Bargate Homes email_redacted.pdf

Bargate Homes-Reps Letter_redacted.pdf

Bargate Homes Appendix 1 - i-Transport Review_redacted.pdf

Bargate Homes Appendix 2 - Landmark Chambers Advice_redacted.pdf

Bargate Homes Appendix 3 - BDBC Response_redacted.pdf



BSGD-C12-OV25-10 Basingstoke and Deane

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (2)

BDBC email_redacted.pdf

BDBC response.pdf

BSGD-C12-OV25-11 Claire Mitchell

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

C Mitchell response (no full address)_redacted.pdf

BSGD-C12-OV25-12 Land Investment
Projects Ltd

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (2)

CBRE_email_redacted.pdf

CBRE_response.pdf

BSGD-C12-OV25-13 Hampshire County
Council

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (2)

HCC email_redacted.pdf

HCC response_redacted.pdf

BSGD-C12-OV25-14 Ian Elkins

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (2)

I Elkins email_redacted.pdf

I Elkins response_redacted.pdf



BSGD-C12-OV25-15 Jane Dooley

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (1)

J Dooley response_redacted.pdf

BSGD-C12-OV25-16 John Raw

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (2)

J Raw email_redacted.pdf

J Raw response_redacted.pdf



BSGD-C12-OV25-17

Johanna Thompson

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

J Thompson response_redacted.pdf

BSGD-C12-OV25-18

St Philips Land &
Landowners

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (2)

Lichfields email_redacted.pdf

Lichfields response_redacted.pdf

BSGD-C12-OV25-19

National Highways

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

National Highways response_redacted.pdf

BSGD-C12-OV25-20

Public Health Hampshire

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

Public Health response_redacted.pdf

BSGD-C12-OV25-21

Stephen Foot

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (2)

S Foot email_redacted.pdf

S Foot response_redacted.pdf

BSGD-C12-OV25-22

Southern Water

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (2)

S Water email_redacted.pdf

S Water response.pdf

BSGD-C12-OV25-23

Steve Williams

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

S Williams response_redacted.pdf

BSGD-C12-OV25-24

Natural England

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (3)

Nat England email.pdf

Nat England Response.pdf

NE Response - Annexe A.pdf

BSGD-C12-OV25-25

Historic England

No

Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachments

Attachments (3)

Historic England email_redacted.pdf

Historic England Letter_redacted.pdf

Historic England Overton Reg 14 (G.DA)_redacted.pdf

BSGD-C12-OV25-26	NHS Hampshire and Isle of Wight Integrated Care Board	No
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Title: Q1. Which part of the neighbourhood plan does your representation relate to?

Q1. Which part of the neighbourhood plan does your representation relate to?

See attachment

Attachments (1)

NHS Hampshire response_redacted.pdf

Victoria Corrigan

From: Anne Phillips <[REDACTED]>
Sent: 11 October 2025 12:16
To: Local Plan
Subject: Overton Neighbourhood Plan - Consultation
Attachments: A Phillips response to ONP.pdf

**** PLEASE NOTE: This message has originated from a source external to Basingstoke & Deane Borough Council, and has been scanned for viruses. Basingstoke and Deane Borough Council reserves the right to store and monitor e-mails ****

Dear Sir/Madam

Please find attached my representation form for the Overton Neighbourhood Plan. Can you please confirm that you can read the attachment as I am having problems with adobe.

Thank you
Anne Phillips

[REDACTED]

Tel: [REDACTED]



Basingstoke and Deane Borough Council

Representation form for the Overton Neighbourhood Plan 2025-2040

Overton Parish Council has submitted their Neighbourhood Plan to the Local Planning Authority (Basingstoke and Deane Borough Council) who are now consulting on the plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. The consultation runs from **Thursday 4 September until 5pm on Thursday 16 October 2025**.

Representations should be submitted by no later than **5pm on Thursday 16 October 2025** online at <https://consult.basingstoke.gov.uk/consultation/Overton-neighbourhood-plan-review-submission-regulation-16>. Representations can also be made by returning this form or writing to Basingstoke and Deane Borough Council.

by post to: Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH

by email to: local.plan@basingstoke.gov.uk

This form has two parts:

Part A – personal details

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

PART A

Personal details (If an agent is appointed, please complete only the

Title, Name and Organisation boxes below but complete the full contact details of the agent in 2)

Agent's details (if applicable)

Title	MRS
First name	ANNE
Last name	PHILLIPS
Job title (where relevant)	
Organisation (where relevant)	
Address	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]
Email address	[REDACTED]

Title	
First name	
Last name	
Job title (where relevant)	
Organisation (where relevant)	
Who are you representing?	
Address	
Postcode	
Telephone number	

Are you responding as:

- | | | | |
|---------------------------------------|-------------------------------------|--------------------------------|--------------------------|
| An individual | <input checked="" type="checkbox"/> | A town or parish council | <input type="checkbox"/> |
| A district/borough council | <input type="checkbox"/> | A borough councillor/MP | <input type="checkbox"/> |
| On behalf of an organisation | <input type="checkbox"/> | On behalf of a community group | <input type="checkbox"/> |
| A landowner/developer/agent/architect | <input type="checkbox"/> | Other | <input type="checkbox"/> |

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Overton Neighbourhood Plan does your representation relate to?

- a. Paragraph b. Policy c. Other

2. Do you support or oppose that part of the Overton Neighbourhood Plan?

- Support Oppose

Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

The Plan is well thought out and represents Overton peoples preference not to build on green fields but to build on the brown field site @ Portals Mill.

The allocation of the Portals Mill site for development gets my support.

I like the way the plan protects our natural environment at the same time as providing homes for people.

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

None needed.

Continue on a separate sheet if necessary

The majority of neighbourhood plan examinations are expected to be through written representations. However, should the examiner decide there is a need for a public hearing, please state below whether you would like to participate.

3. If a public hearing is necessary would you like to participate?

- a. No, I do not wish to participate at the examination public hearing
- b. Yes, I wish to participate at the examination public hearing

4. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

I think it is important to get overton residents views as well as developers who just want to make money building on Overton's farmland.

Continue on a separate sheet if necessary

Data Protection Statement

In complying with the General Data Protection Regulation (GDPR), Basingstoke and Deane Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to the Overton Neighbourhood Plan consultation on the council's website. This will include publication of names of respondents and company names (where appropriate). Please ensure you do not include any personal information in Part B of the document. Copies of all consultation responses, including redacted versions of Part A, will be available to view at the council offices, and photocopies can be made of these representations on request.

By submitting representations, your details will be added to the Basingstoke and Deane Planning Policy Consultation database, and you may be contacted at future stages of the Overton neighbourhood plan process. All personal data will be processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation ('GDPR').

Personal information will also be shared with the appointed examiner, who may wish to contact you to discuss your comments and concerns, prior to the examination of the neighbourhood plan.

Please indicate below if you wish to be kept informed of the progress of the Overton Neighbourhood Plan and if you are happy for us to contact you.

- a. If you wish to be notified of the Examiner's Report please tick box**
- b. If you wish to be notified of the 'Made' Neighbourhood Plan please tick box**

Basingstoke and Deane Borough Council is the data controller for the personal information you provide on this form. You can contact the council by phone on 01256 844844, via email to customer.service@basingstoke.gov.uk or by writing to us at Civic Offices, London Road, Basingstoke RG21 4AH. The council's Data Protection Officer can be contacted at dpo@basingstoke.gov.uk

We will process personal data provided on this form only for the purposes relating to this consultation. A summary of consultation responses may be reported to the relevant council Committee and published on the council's website.

As a public authority the council is subject to the provisions of the Freedom of Information Act (FOIA) and Environmental Information Regulations (EIR). This means we may be required to disclose information provided as part of this consultation if it is requested. Personal data will not be disclosed under FOIA or EIR.

- we will share your information with the appointed examiner for the purpose of examining the neighbourhood plan
- we will not disclose any information to other organisations unless we are required by law to do so
- your personal details will only be held as long as is needed for this consultation and in accordance with our retention policy

For further details on how your information is used; how we maintain the security of your information and your rights, including how to access information we hold on you and how to complain if you have any concerns about how your personal details are processed, please visit www.basingstoke.gov.uk or email dpo@basingstoke.gov.uk

Victoria Corrigan

From: Anna Thame <[REDACTED]>
Sent: 11 October 2025 13:36
To: Local Plan
Subject: Overton Neighbourhood Plan Reg 16 consultation

**** PLEASE NOTE: This message has originated from a source external to Basingstoke & Deane Borough Council, and has been scanned for viruses. Basingstoke and Deane Borough Council reserves the right to store and monitor e-mails ****

I wish to register my comments as part of the Regulation 16 consultation process for the Overton Neighbourhood Plan.

I support the Plan including the identification of the former Portals site as a site for any future housing development. I support it because it is a brown field site which already has some existing infrastructure and is already developed, albeit for industrial use. I support it because we should not build on green field land which impacts on the character of the village, the natural environment and the green space which surrounds and delineates the village.

I wish to record my support for all aspects of the Overton Neighbourhood Plan put forward by Overton Parish Council on behalf of the village.

Best wishes,
Anna Thame



Victoria Corrigan

From: Jamie Hanna <[REDACTED]>
Sent: 16 October 2025 12:08
To: Local Plan
Cc: Ryan Johnson
Subject: Overton Neighbourhood Plan Regulation 16 Consultation - Representations on Behalf of Bargate Homes
Attachments: Reps Letter - Overton Neighbourhood Plan Reg 16 Consultation.pdf; Appendix 1 - i-Transport Review.pdf; Appendix 2 - Landmark Chambers Advice.pdf; Appendix 3 - BDBC Response.pdf

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Dear Sir / Madam,

Please find attached our representations on behalf of Bargate Homes in respect of the Overton Neighbourhood Plan Regulation 16 Consultation.

We concur with Basingstoke and Deane Borough Council's letter from 25 September 2025 that the plan should be examined and wish to participate at the public examination hearing to assist the Inspector. We also wish to be notified about the Examiner's Report and the next stages of making the Overton NP.

Please advise that these representations have been duly made.

Kind regards,

Jamie

Jamie Hanna
Senior Planner

Turley

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16 October 2025

By email only

Planning Policy
Basingstoke and Deane Borough Council
Civic Offices
London Road
Basingstoke
RG21 4AH

Our ref: BARS3038

Dear Sir or Madam

**OVERTON NEIGHBOURHOOD DEVELOPMENT PLAN 2025–2044 REGULATION 16 CONSULTATION
REPRESENTATIONS ON BEHALF OF BARGATE HOMES**

Thank you for the opportunity to comment on this Regulation 16 consultation. We provide the following representations on behalf of our client, Bargate Homes, who have interests in land west of Sapley Lane (the 'Site').

We have reviewed the Regulation 16 version of the Neighbourhood Development Plan (NDP) and accompanying documents, and highlight a number of significant concerns with both the plan as drafted, and the evidence base that underpins this; which, in our view, requires further investigation and/or modification before being independently examined. As drafted, we contend the plan fails to meet the Basic Conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied by section 38A of the Planning and Compulsory Purchase Act 2004.

We detail our concerns in the following table, with reference to supporting legal and technical statements from the following:

- Appendix 1: A legal opinion from Sasha White KC and Matthew Fraser of Landmark Chambers, addressing matters of compliance with the basic conditions set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), amongst other matters.
- Appendix 2: Technical evidence prepared by i-Transport, assessing whether there is sufficient evidence to conclude the Portals Mill site allocation (Policy H2: Land at Portals Mill), would contribute to the achievement of sustainable development.

The following sections accordingly set out our representations and recommended modifications, supported by technical and legal evidence, to ensure that the plan is capable of meeting the statutory requirements and can be properly scrutinised through the examination process.

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In such regards, we note and support Basingstoke & Deane Borough Council’s (BDBC) recommendation that the NDP is independently examined, as set out in the BDBC representations to Overton Parish Council (OPC) on the draft NDP, dated 25 September (see Appendix 3). We concur with and support BDBC’s stated overall conclusion, which states:

‘It is therefore considered that the modifications proposed do expand upon the existing policy framework and would be so significant or substantial as to change the nature of the plan. Therefore, in summary, the LPA considers that the neighbourhood plan should be subject to an independent examination and referendum’. (Extract of BDBC Letter to OPC, dated 25 September 2025).

We trust the following provides assistance in modifying the plan, and the evidence base that informs this, prior to a further round of consultation and independent examination.

Policy / Paragraph / Document	Comment
Overton Neighbourhood Plan	
Table 2 Vision and Objectives	<p>The Vision and Objectives set out in Table 2 are underpinned by the assumption that Overton’s housing needs can be met through brownfield and windfall sources alone. This is reflected in Objective 2, which states that “new dwellings should be built on brown field sites rather than green field sites,” and in the overall spatial strategy which focuses growth within the settlement policy boundary and primarily on the Portals Mill site (Policy H2).</p> <p>While this approach may reflect community preferences expressed during consultation, it is essential that the Neighbourhood Plan is also evidence-led and capable of meeting the basic conditions.</p> <p>The evidence base used to justify the allocation of the Portals Mill site includes, amongst other documents, an SEA (AECOM, Jan 2025) and HRA (AECOM, Jan 2025). However, both the SEA and HRA assess the implications of this site alone and in combination, on the basis of an allocation for 340 homes, and not what that is now proposed in Policy H2 of the NDP, which is for 400 units. Neither equally assess the full indicative housing requirement of 410 homes provided to OPC by BDBC.</p> <p>As we elaborate on in our comments to Policy H2, there are significant omissions in the evidence base supporting this policy. To an extent we cannot conclude:</p> <ol style="list-style-type: none"> 1. The making of the NDP would be compatible with EU obligations (Basic Condition f.). 2. This policy will contribute to the achievement of sustainable development (Basic Condition d.). 3. It will meet the indicative housing requirement of 410 homes, provided to OPC by BDBP under Paragraph 70 of NPPF 4. New dwellings will only need to be built on brownfield sites within the NDP plan period (as inferred in objective 2 of the vision). As elaborated in our comments to Policy H2, there is a very real

prospect that additional sites will need to be allocated through this NDP, or via Local Plan, should the NDP not seek to do so at this juncture.

OPC and BDBC have concluded the NDP is likely to have significant environmental effects, and have accordingly produced an SEA and HRA to inform the plan making process. This is with the objective of demonstrating the NDP will contribute to achieving sustainable development, amongst other matters. However, the conclusions drawn from the current published SEA and HRA are out of date, do not assess Policy H2 as now submitted, are not underpinned by sufficient evidence, and as a result are flawed.

This is particularly the case with regards to highway safety and capacity considerations, as set out in the independent report enclosed at Appendix 1. There is insufficient evidence to suggest such considerations were accounted for in the SEA process, particularly when assessing this policy option versus reasonable alternatives, which as we will elaborate on, further call into question the assessment outcomes. It equally calls into question whether the H2 Policy is capable of delivering the quantum and mix of uses proposed within the plan period. As set out in our comments on Policy H2, we assert not, and suggest further evidence be commissioned and modifications made to the NDP accordingly.

The HRA accompanying the NDP equally assesses 340 units, and not 400 units in its assessment, and goes further by asserting at paragraph 6.4:

'The HRA of this Plan concluded that the proposed growth in Overton would not cause likely significant effects upon any European sites, either alone or in combination with other plans and projects. Since the Overton Neighbourhood Development Plan (NDP) adheres to the housing allocations and policies within the Local Plan, it can be concluded that the NDP will not adversely impact European sites, either alone or in combination with other plans and projects.'

However, the NDP Policy H2 site is not allocated in, nor was it factored into the adopted Development Plan through its drafting stages to adoption. As a result, it was not assessed as part of the HRA that informed the adopted Development Plan. It cannot therefore simply be assumed, without further assessment of the submission version of Policy H2, that *'the NDP will not adversely impact European sites, either alone or in combination with other plans and projects'*.

We elaborate further on the consequences and suggested actions in our representations to Policy H2.

The housing requirement of 250 dwellings referenced in the NDP is now outdated. Basingstoke and Deane Borough Council's (BDBC) Updated Proposed Spatial Strategy and Draft Settlement Study (September 2025) indicates a revised requirement of 410 dwellings for Overton. This has significant implications for the Vision and Objectives, which do not appear to have been revisited in light of this updated evidence.

The assumption that brownfield land alone can meet this increased requirement is not supported by robust evidence. As discussed in our comments on Policy H2, there are serious concerns about the deliverability

and viability of the Portals Mill site, which is the sole allocation intended to meet the housing requirement. If this site cannot deliver the full quantum of development, the plan risks falling short of the indicative housing requirement provided by BDBC at OPCs request, in accordance with paragraph 70 of NPPF. The latter was requested in recognition of the fact the NDP is progressing in advance of the emerging review Local Plan, and an acknowledged desire to avoid prejudicing the emerging Local Plan spatial strategy, which is due to be consulted upon, via a second Regulation 18 stage shortly.

As we outline in our representations to Policy H2, there is insufficient evidence provided with the NDP to conclude objective 2 of the plan's vision is reasonable and deliverable. Indeed, we assert there is a very strong case to suggest additional sites will need to be found, including greenfield sites, to meet the housing requirement BDBC have indicated and are likely to confirm in the emerging Local Plan.

It would be more appropriate we suggest for this objective to be reframed, to acknowledge that whilst the plan has a brownfield focus, it is yet to be determined if the Portals Mill site is capable of meeting the entirety of the housing requirement currently indicated for Overton in the emerging Local Plan. As a consequence, further sites may be required to meet this need, either through an update to this plan, or via the Local Plan.

Paragraph 6.1 Housing requirement for Overton

Paragraph 6.1 states that the indicative housing requirement for Overton is 250 dwellings, based on BDBC's July 2025 response to Overton Parish Council's request under paragraph 70 of the NPPF (2024). However, this figure is now outdated.

BDBC has published its Updated Proposed Spatial Strategy and Draft Settlement Study (September 2025), which indicates a revised indicative housing requirement of 410 dwellings for Overton. This updated figure reflects the borough's increased housing need and revised spatial distribution strategy, and should therefore be considered the most relevant evidence base for determining the housing requirement. BDBC have confirmed this in writing in their representations to the NDP dated 25 September 2025 (see Appendix 3).

A lower overall quantum of development for the plan area, and specifically for the Portals Mill site (Policy H2) has been assessed through both the SEA and HRA process. This should have been updated, particularly for the Policy H2 site for this Regulation 16 stage, and tested alongside reasonable alternatives. This, and further evidence is requested be commissioned to inform modifications to the plan, with a further Regulation 16 consultation then undertaken prior to independent examination stage.

In light of this, and the conclusions we reach in our representations to Policy H2, we are unable to conclude the Neighbourhood Plan meets Basic Condition (d), and (f), which requires that the plan contributes to the achievement of sustainable development. In addition, if the plan does not plan positively for the level of growth now identified, it risks failing to meet local housing needs and undermining the emerging strategic planning

framework. This will need to be acknowledged and addressed in the NDP, with a decision taken on whether further allocations need to be made in the NDP, or whether any deficit is left to be addressed in the Local Plan, or subsequent update to the NDP once the Local Plan is adopted.

The current plan's reliance on a single site allocation (Policy H2) to meet the housing requirement compounds our concerns. As set out in our comments on Policy H2, there are significant questions around the justification for and achievability of the policy as drafted, which may affect its ability to deliver the full quantum of development proposed. If the site cannot deliver the required number of homes, the plan may fall short of meeting even the outdated 250-dwelling figure, let alone the revised 410-dwelling requirement.

We therefore recommend that:

- Paragraph 6.1 be updated to reflect the revised housing requirement of 410 dwellings.
- The SEA and HRA be revisited to assess this indicative housing requirement, and reasonable alternative options to meeting this, having first further scrutinised the suitability and capacity of the Portals Mill site to contribute toward such needs.
- Identify whether there is a need for additional or alternative site allocations to meet this requirement (either via the NDP or Local Plan).
- The plan be reconsulted upon with an updated evidence base prior to submission for examination to ensure compliance with the Basic Conditions.

This approach would ensure that the Neighbourhood Plan has the necessary and proportionate evidence to demonstrate compliance with the basic conditions. We are currently unable to reach that conclusion on the basis of the current NDP and supporting evidence base.

Policy H2: Land at Portals Mill

As highlighted in our previous Regulation 14 consultation submission, there are several matters that need further assessment before concluding on the suitability and capacity of this site for the uses and quantum proposed.

Site Suitability and Capacity

We note that no additional evidence has been submitted with the Regulation 16 consultation to confirm that an increase from 340 homes to 400 homes is appropriate and deliverable. Indeed, both the SEA and HRA that accompany the plan assess lower levels of growth plan wide, and for this site. As we elaborate on further below, the absence of this evidence, and indeed evidence to support the previous figure of 340 homes, calls into question whether this policy is capable of contributing to the achievement of sustainable development.

These concerns can be broken down into the following matters:

Highways

BDBC have provided comments on this policy in their representations to the Reg. 16 NDP consultation (See Appendix 3). This re-iterates their wide ranging concerns made at Regulation 14 stage to the proposed Kingsclere Road vehicular access for this site, which the Council still considers unacceptable in both landscape and highways terms, and not supported by evidence. BDBC also reference a County Highways request to assess the viability of such an access, which remains equally unanswered. Criterion xxi suggests such access points are contingent on further assessment by the highway authority for suitability and safety. We agree with the comments made by BDBC, that this is a critical matter that needs to be addressed at the plan making stage. The removal of this access could well have implications for site suitability, capacity and deliverability assumptions, that ought to be factored into the SEA process, particularly against the reasonable alternatives.

Our client has commissioned their own independent assessment of the transport and accessibility implications of this policy, to determine if this is reasonable and deliverable within the sites context, and to better understand the implications of this for site sustainability and capacity. This is set out in Appendix 1, which highlights significant highway safety and accessibility concerns that potentially undermine the suitability, and deliverability of policy H2.

These concerns raise serious questions about the feasibility of the allocation, particularly in light of the policy's own requirements:

- Criterion iii: requires that the development “will not have a severe adverse impact on the local highway network nor have an unacceptable impact on highway safety.”
- Criterion iv: requires that the development “prioritise and maximise the use of active travel and public transport.”
- Criterion v: requires “safe, suitable and convenient access to local facilities and services, including Overton village centre.”

Accordingly, we are not able to conclude Policy H2, as currently drafted, will contribute to the achievement of ‘sustainable development’ under basic condition (d). Further assessment work is recommended, with the outputs fed into an updated SEA and HRA process, to determine this site’s contribution to meeting needs, alongside assessments of the other reasonable alternatives.

Site Promoter/Developer Evidence

In commenting on the site’s consideration in the previous Regulation 18 BDBC Local Plan (date), the site promoter Portal’s Paper Limited (PPL) made several comments¹ which raise questions over the overall capacity of the site to deliver either the original 340 dwelling figure, or the current Regulation 16 plan’s proposed uplift to 400 dwellings. Additional comments made by the promoter in response to the Regulation 14 NDP consultation

¹ [Representations on behalf of Portals Paper Limited | Basingstoke and Deane Borough Council Online Consultation Portal](#)

are contained within the Consultation Statement published as part of this Regulation 16 consultation which raise additional concerns. We previously highlighted these in our representations to the Regulation 14 NDP consultation, which include:

- A request that the policy requirement to provide additional parking for the railway station is removed.
- A request to remove the requirement to deliver employment and retail uses on the site on viability grounds.
- Requested that any reference to the retention of historic assets are removed from the policy. In contrast, BDBC's response to the Regulation 16 consultation references that the Council's Historic Environment Team consider some of the existing buildings within the Portals Mill site to have some level of heritage significance and consider them to be non-designated heritage assets. BDBC therefore support the inclusion of the policy wording now provided in the NDP, which seeks retention of some buildings where possible. The implication of this for site viability, capacity and delivery are not evidenced, and we suggest require further assessment.
- Requested that several 'principles' of the allocation around active travel, public transport and safe access to local facilities are removed, yet are retained in the Regulation 16 policy. Again, it is unclear on the implication of this for site capacity and deliverability, but as set out in our client's independent assessment of such matters (Appendix 1), significant uncertainty remains over these elements, and implications therefore arising from this for site capacity assumptions. Further evidence is required in our view to confirm the policy as drafted is likely to be deliverable, and in doing so, contribute to the achievement of sustainable development. As set out in the appended highway assessment (see Appendix 1), this is called into question by the lack of evidence accompanying or informing NDP Policy H2.

Deliverability

The deliverability of the Portals Mill allocation is subject to significant uncertainty due to a combination of physical, legal, and viability constraints.

Key infrastructure requirements, particularly pedestrian and cycle connections to Overton train station, are reliant on third-party land ownership, including Network Rail and South Western Railway. This introduces legal, viability and land availability risks that may prevent delivery of essential elements of the policy, directly affecting compliance with criterion iv (active travel) and criterion v (safe access to local services).

BDBC's Regulation 16 response further highlights serious concerns about the proposed vehicular access from Kingsclere Road. The access is constrained by third-party land (including land associated with the Gas Governors) and the physical limitations of the railway bridge. BDBC

recommends this access be retained only for emergency use, which undermines the ability to meet criterion iii (no severe adverse impact on the highway network).

Additional concerns raised by PPL in their Regulation 18 response to the BDBC Local Plan² and comments to the Regulation 14 NDP consultation summarised in the Consultation Statement include:

- Nutrient neutrality may require off-site mitigation, and costs, which is outside the developer's control (criterion xii). The implications of this for viability are not stated.
- Requests to remove policy requirements for employment, retail, car parking at Overton Station, and retention of historic buildings suggest uncertainty around whether the proposed quantum of development (340–400 dwellings) is achievable under current policy wording.
- Land remediation cost implications unquantified at this stage. These costs are often unpredictable and can significantly reduce the scope for policy compliance, particularly in relation to affordable housing and infrastructure contributions.
- Viability concerns regarding the delivery of 5% custom/self-build homes and 40% affordable housing due to high potential abnormal development costs. This is particularly concerning given the high level of affordable housing need in the borough (169 homes per year, as noted in BDBC's 2023 Affordable Housing Needs Assessment).

These viability concerns are compounded by other policy requirements, including:

- Active travel infrastructure
- Potential off-site mitigation requirements to demonstrate BNG and nutrient neutrality

The NDP offers little evidence to allow one to conclude the policy as drafted is deliverable, and by extension, likely to contribute to the achievement of sustainable development (Basic Condition d.).

These issues collectively raise doubts whether the allocation can deliver the intended mixed-use community and sustainability benefits assumed in assessing this in the SEA, in comparison to the reasonable alternatives. The supporting evidence does not appear to fully assess the deliverability of such an aspirational policy, and if not deliverable, what form would be. This could well have influenced decisions made both through the SEA process, and level of support for the policy as drafted through the community engagement stages.

For example, determining whether there is evidence, as the site promoter infers, to suggest employment and retail uses need to be reduced or omitted to render the policy viable. If so, what impact would such employment use loss have for the future of the village (inc. need to travel

² [Representations on behalf of Portals Paper Limited | Basingstoke and Deane Borough Council Online Consultation Portal](#)

further for employment as a consequence) and to the sustainability of and local support for the proposal sought under Policy H2. This would be a significant consideration in the SEA process, and assessment of reasonable alternatives that we argue ought to be addressed at the plan making stage. The policy should be revised to account for what is likely to be suitable and deliverable within known constraints, and then reassessed through the SEA against reasonable alternatives. This will assist in deducing whether additional sites are required to help meet the indicative housing requirement provided by BDBC, at the request of OPC, under paragraph 70 of NPPF. The outcomes should be reconsulted upon before progressing to examination stage.

In conclusion, and as set out in the preceding sections, there are significant concerns regarding the suitability and deliverability of the Portals Mill allocation. These concerns are not isolated but interrelated, and collectively raise serious doubts about whether the proposed allocation can be implemented in a way that achieves sustainable development.

There is insufficient evidence provided to demonstrate that the policy would result in sustainable development, as required by Basic Condition (d). This condition requires that a neighbourhood plan must contribute to the achievement of sustainable development, as defined in the National Planning Policy Framework (NPPF 2024). The absence of robust evidence on transport, landscape, infrastructure, and viability undermines confidence in the policy's effectiveness and its ability to meet this requirement.

As discussed above, the allocation is subject to multiple constraints and issues which not only affect the feasibility of the allocation but also call into question the overall capacity of the site. It is therefore uncertain as to whether the allocation can contribute, and to what level, to meeting the indicative housing requirement of 410 dwellings provided by BDBC, at the request of OPC, under paragraph 70 of NPPF.

Moreover, the above outstanding issues mean that there is significant uncertainty around the suitability and deliverability of the allocation as a whole. This needs to be reassessed against reasonable alternatives in an updated SEA, with the outcomes reconsulted upon prior to examination.

Policy LEB2
View 5

Policy LEB2 proposes to designate an 'Important View' on the southern edge of Sapley Lane Playing fields, indicated as View 5 within Figure 6 of the policy.

The purpose of Important Views is to "*protect and enhance the most valued views and vistas to and from the surrounding countryside and within the village itself*" (Table 2. Overton Neighbourhood Development Plan Objectives). Policy LEB2 goes on to state that Important Views are '*considered especially valued by local people in defining the relationship between the village and the surrounding countryside*' (para. 86). It is also made clear that in determining Important Views, special consideration has been given to how the North Wessex Downs National Landscape relates to the village.

Based on the policy criteria noted above it is clearly the case that the view from Sapley Lane, as detailed within Appendix C, falls short of the threshold necessary for designation as one of the most valued views within the parish of Overton. Indeed, the majority of the users of Sapley Lane Playing Field will not experience the view illustrated, which is from the southernmost perimeter of the recreational area, beyond a prominent line of trees (Jubilee Avenue) that enclose the main recreational open grassland.

Jubilee Avenue comprises a double line of trees, which, in combination with other tree groups, establishes a good level of visual containment along the southern edge of the playing fields. The main recreational and activity area, including the playing pitches and skateboard park, is located to the north of this avenue. As such, from most vantage points within the recreational area the agricultural land to the south, while visible between the trees, is neither prominent or a defining feature of the view. In this regard, View 5 can be said to be unrepresentative of what most users of the Sapley Lane Playing Fields will experience.

It is also relevant to note that the majority of Important Views include features of particular note such as the spire of St. Mary's Church, historic bridges or buildings, the River Test or sweeping vistas to the North Wessex Downs National Landscape. View 5 has none of these, and at best can be described as an attractive but unremarkable view of agricultural fields contained by woodland. While it is acknowledged that views of the surrounding countryside have value, this view is very much commonplace, with none of the features distinct to the village.

While users of Sapley Lane Playing fields unquestionably enjoy the visual amenity afforded by the open land within the designated open space, the agricultural land to the south is clearly peripheral and secondary to this, with the main value arising from the views across the recreational grounds. Further, the location proposed as an Important View is not representative of what most users will see or enjoy when using the park. As such, it does not meet the necessary criteria of being either a 'valued view' or 'defining the relationship between the village and the surrounding countryside'. Its inclusion of View 5 is therefore erroneous and it should be omitted.

The inclusion of View 5 in Policy LEB2 fails to meet the following Basic Conditions:

- Basic Condition (a): The policy does not have sufficient regard to national policy, particularly paragraph 16 of the NPPF, which requires that policies are clearly written, unambiguous, and supported by proportionate evidence. The designation of View 5 lacks a clear evidential basis and does not reflect a consistent or objective methodology.
 - Basic Condition (d): The policy does not contribute to the achievement of sustainable development. By imposing unnecessary restrictions on land that does not demonstrably warrant protection, the policy risks constraining otherwise appropriate development opportunities without a justified planning rationale.
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- **Basic Condition (e):** The policy is not in general conformity with the strategic policies of the development plan. BDBC's Local Plan Policy EM1 (Landscape) requires that development proposals respect and enhance the character and visual amenity of the landscape. However, this must be applied proportionately and based on demonstrable value. The designation of View 5 does not reflect this approach.

Strategic Environmental Assessment

The Strategic Environmental Assessment (SEA) published is largely unchanged from the version published alongside the Regulation 14 consultation. We note that much of our comments from the Regulation 14 consultation still apply.

Based on the comments provided above and on a review of the updated Regulation 16 plan, we have provided additional comments below in respect of the SEA.

As set out in our earlier comments and in the Landmark Chambers legal letter (contained in Appendix 1 of this submission), we note that the Strategic Environmental Assessment (SEA) is predicated on meeting a housing requirement of 250 homes, rather than the 410-home indicative stated by BDBC in September 2025. The assessment process and conclusions are to an extent therefore influenced by this, and specifically the assumption that a single brownfield site could potentially meet all the area's needs.

In addition, the SEA assesses the effects of 340 units at Portals Mill, rather than the 400 units proposed in Policy H2. The outcome of this to the assessment may be significantly different, which ought to have been assessed against reasonable alternatives. We have additionally set out in our comments to Policy H2 a number of factors that call into question the scope of the Policy that ought to have been assessed through the SEA. As we outline, the lack of evidence on potential significant highway and landscape effects is particularly worth noting here. In addition, potential elements of the policy may well prove undeliverable. All of which ought to have been factored into a fair and objective assessment of this policy option versus reasonable alternatives.

As set out in our previous Regulation 14 representations, the SEA considers a range of options for meeting the identified housing need stated. Option 2 includes our client's site, while Option 3 corresponds to the Portals Mill site, which is proposed under draft Policy H2.

SEA Process and Reasonable Alternatives

As set out in our comments on Policy H2, there are significant environmental, infrastructure, and viability concerns associated with Option 3. These raise doubts about whether the Portals Mill site remains the most appropriate option. The SEA's grouping of sites into broad spatial options has obscured the performance of individual sites, including those that may offer better outcomes in terms of biodiversity, landscape

sensitivity, and accessibility. This concern is also noted in the legal opinion from Landmark Chambers in Appendix 1 which notes that the assessment is overly broad brush in assessing the effects of developing different sites. Landmark Chambers also note that a further reasonable alternative for a housing requirement of 410 dwellings could be to provide “the Overton Mill allocation together with one or more sites in Overton”, with a readily available solution being an additional allocation for the Site.

We reiterate our concern that the SEA process appears to support a predetermined outcome rather than providing an objective assessment of reasonable alternatives. A more transparent approach would involve assessing individual sites on their own merits, and in combination, to determine whether alternative sites could better meet the housing requirement while minimising environmental harm.

The SEA does not appear to have considered the abnormal development costs associated with the Portals Mill site, including land remediation and off-site nutrient mitigation. As noted in our comments on policy H2, these costs may affect the ability to deliver key policy requirements such as 40% affordable housing.

The SEA also fails to account for the biodiversity and nutrient neutrality benefits demonstrated by other sites, including our client’s site. These factors should be considered in the comparative assessment of reasonable alternatives.

We also highlight Landmark Chambers’ conclusion that the SEA *“fails to conduct a legally adequate assessment of reasonable alternatives”*.

Transport and Highways Evidence

As discussed in our comments on Policy H2 above, the SEA does not adequately assess the transport-related constraints of the Portals Mill site. The conclusion that all options perform similarly in terms of sustainable access is not supported by evidence and fails to reflect the accessibility challenges identified by both the site promoter and BDBC.

BDBC’s Regulation 16 response raises concerns about the proposed access from Kingsclere Road, particularly its impact on the North Wessex Downs National Landscape. These concerns directly undermine the SEA’s conclusion that Option 3 performs well in terms of landscape and transport impacts.

The SEA does not appear to assess whether the policy’s transport-related criteria, including safe access, mitigation of highway impacts, and active travel connections, are deliverable. As noted in our comments on Policy H2, the feasibility of pedestrian and cycle connections to Overton station is uncertain due to third-party land ownership.

Landscape

The SEA’s assessment of landscape impacts for Option 3 is based on the original capacity of 340 dwellings and has not been updated to reflect the increased quantum of 400 dwellings proposed in the Regulation 16 version of the Neighbourhood Plan. This is a significant omission, as the additional development may result in greater landscape harm, particularly given the

site's partial location within the North Wessex Downs National Landscape, a nationally designated and highly sensitive area.

BDBC's Regulation 16 response highlights the unacceptable landscape impacts of the proposed vehicular access from Kingsclere Road, including the loss of structural vegetation and urbanising features. These impacts have not been assessed in detail by the SEA.

The SEA also fails to evaluate the implications of development on land outside the settlement policy boundary but within the site allocation boundary. These areas are identified by BDBC as highly sensitive and should be retained for informal open space. It is unclear whether the proposed capacity has adequately accounted for these constraints or whether the landscape-led approach required by Policy H2 can be achieved at the increased or original quantum.

Heritage

We reference our previous comments on Policy H2 in respect of heritage. The SEA has not been updated to consider potential effects on the non-designated heritage assets contained within Option 3 and therefore needs to be updated to consider this additional constraint.

We therefore conclude that the SEA is not sufficiently robust to support the submission of the Neighbourhood Plan for examination. It must be updated to:

- Reflect the increased housing quantum proposed
- Assess individual sites and reasonable alternatives on their own merits; and
- Consider the full range of environmental and infrastructure constraints associated with Option 3, and implications of these for site capacity, mix of uses and benefits, and ensure these are accounted for in the assessment process.

Only through a revised and transparent SEA process can the Neighbourhood Plan be properly assessed against the basic conditions and national policy requirements.

In our view, the Regulation 16 version of the Overton Neighbourhood Development Plan is not currently capable of meeting the Basic Conditions required for submission to examination. The plan's spatial strategy, reliance on a single brownfield allocation, and lack of robust supporting evidence raise serious concerns. As set out in our representations, the allocation of the Portals Mill site under Policy H2 is subject to unresolved issues relating to transport, landscape, viability, and infrastructure. These concerns are compounded by the failure to update the SEA and HRA to reflect the increased housing quantum and to objectively assess reasonable alternatives. The SEA and HRA conclusion, as currently drafted are accordingly flawed. As per Landmark Chambers' legal opinion "*we would question whether it can properly be said to 'contain policies an allocations to meet its identified housing requirement' for the purposes of NPPF para. 14(b)*".

As we elaborate on in our comments to Policy H2, there are significant omissions in the evidence base supporting this policy. To an extent we cannot conclude:

1. the making of the NDP would be compatible with EU obligations (Basic Condition f.).
2. this policy will contribute to the achievement of sustainable development (Basic Condition d.).

3. It will meet the indicative housing requirement of 410 homes, provided to OPC by BDBP under Paragraph 70 of NPPF
4. New dwellings will only need to be built on brownfield sites within the NDP plan period (as inferred in objective 2 of the NDP vision). As elaborated in our comments to Policy H2, there is a very real prospect that additional sites will need to be allocated through this NDP, or via Local Plan, should the NDP not seek to do so at this juncture.

In light of these concerns, we strongly recommend that Overton Parish Council undertakes a full review of the Neighbourhood Plan and its evidence base prior to submission. This should include:

- Further technical work to address the deliverability and infrastructure constraints of the proposed Policy H2 allocation;
- Consider whether the capacity of the Portals Mill site is sufficient to meet the identified need of 410 dwellings and if additional allocations would be required;
- A revised SEA and HRA that properly assesses the increased housing requirement, and realistic expectations from the Portals Mill site, against the reasonable alternatives (individually and cumulatively);
- Modifications to the NDP to account for updated conclusions, and consultation on the outcome and policy options arising.
- A reassessment of the plan's ability to meet the Basic Conditions.

Until these matters are addressed, the plan cannot be considered to meet the Basic Conditions.

Yours faithfully

Jamie Hanna
Senior Planner

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Overton Neighbourhood Plan

Transport review of Policy H2 Land at Portals Mill

Client: Bargate Homes

i-Transport Ref: SJ/ITB15180-017A

Date: 14 October 2025

Overton Neighbourhood Plan

Transport review of Policy H2 Land at Portals Mill

Client: Bargate Homes

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Date: 14 October 2025

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Quality Management

Report No.	Comments	Date	Author	Authorised
ITB15180-017	Draft	13/10/25	SJ	SJ
ITB15180-017A	Issue	14/10/25	SJ	SJ

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ONP Policy - H2 Land at Portals Mill Review.docx

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Appendices

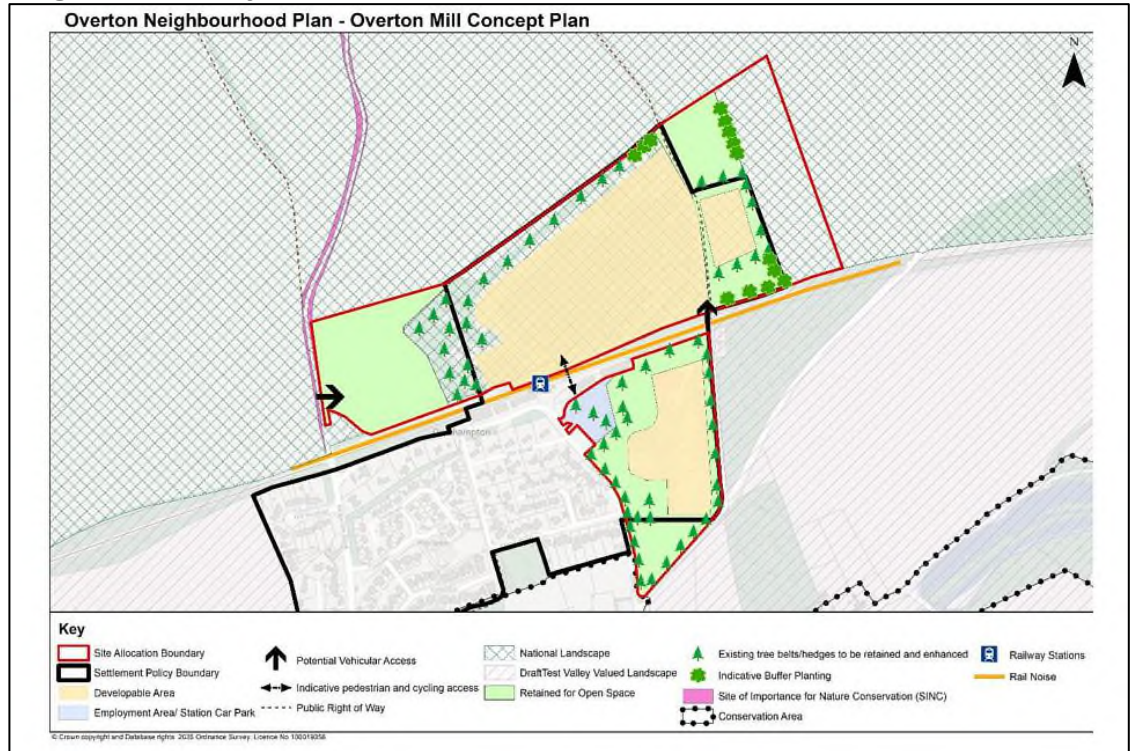
APPENDIX A.	DeLaRue letter on Vulnerability of the Papermill Lane access and Decision Notice
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SECTION 1 Introduction

1.1 Purpose of this report

1.1.1 This report provides a transport focused review of the Submission Overton Neighbourhood Plan (ONP) and specifically the site allocation *Policy H2 – Land at Portals Mill*, as shown in **Image 1**.

Image 1: ONP Policy H2 – Land at Portals Mill



Source: ONP Figure 4

1.1.2 Overton Parish Council has submitted the ONP to the Local Planning Authority (Basingstoke and Deane Borough Council - BDBC) who are now consulting on the plan. The consultation runs from Thursday 4 September until 5pm on Thursday 16 October 2025.

1.2 Report structure

1.2.1 This report is to feed into the consultation process, and it covers:

- **Section 2** - A transport focused review of NP *Policy H2 - Land at Portals Mill*
- **Section 3** - An assessment of the site's ability to deliver 400 homes safely and suitably
- **Section 4** - A summary of any identified concerns and / or further evidence required to enable BDBC to rely on this allocation

SECTION 2 Review of NP policy H2 - Land at Portals Mill

2.1 Introduction

2.1.1 The proposed *Policy H2 – Land at Portals Mill* allocation is located to the north of Overton village and comprises of two separate parcels of land, which are bisected by Overton Train Station and the railway line that runs east to west.

2.1.2 The land to the north of the railway line is the location of the now disused Overton paper mill and associated office buildings. The land to the south includes a former water treatment facility associated with the operation of the mill.

2.1.3 The ONP proposes to allocate the site for approximately 400 homes, new employment (Class E(g), B2 and B8), and retail (Class E) uses, in addition to a parking facility for the station – the latter to provided within close proximity to Overton Railway Station. The ONP Concept Plan (**Image 1** of this report) identifies the bulk of the new homes to be provided to the north of the railway line.

2.1.4 The key transport requirements of *Policy H2 – Land at Portals Mill* are set out below.

2.2 Safe and Suitable Access

2.2.1 The ONP, states:

“That part of the site that lies to the north of the railway line, and the residential part of the site to the south of the railway line, will be accessed via Papermill Lane and Kingsclere Road (B3051). The employment, retail and parking facilities to the south will be accessed from Station Hill/Approach. It will need to be demonstrated that the development-related traffic can be satisfactorily accommodated without detriment to the safe operation of:

a. Papermill Lane, particularly where the road narrows under the railway bridge. Pedestrian and cycle improvements are needed to link the site to facilities in Overton to the south.

b. Kingsclere Road (B3051), particularly where the road narrows over the railway bridge and the proximity of the bend to the north of any potential access point” (Ref: ONP paragraph 46)

2.2.2 There is no apparent assessment of either Papermill Lane or Kingsclere Road within the NP and no evidence beyond the diagram ONP Figure 4 (which is shown in **Image 1** of this report) as to how this will be achieved.

2.2.3 Both Papermill Lane and Kingsclere Road are identified in the policy as having constraints, these being:

- **Papermill Lane** – “particularly where the road narrows under the railway bridge”
- **Kingsclere Road** - “particularly where the road narrows over the railway bridge and the proximity of the bend to the north of any potential access point”

2.2.4 In the context of the NPPF (paragraph 115 – “***in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that safe and suitable access to the site can be achieved for all users***” it is surprising that the evidence base supporting the ONP does not provide any detail on either road or the constraints identified.

2.2.5 Furthermore, there is also no appraisal of how much traffic the development will generate, nor how this compares to the previous use, or if any pedestrian and cycle improvements are necessary to support the scale of development propose nor if they are required then are they feasible. This is assessed in further in Section 3.

SECTION 3 Ability to accommodate 400 homes

3.1 Introduction

3.1.1 In the absence of any evidence within or in support of the draft allocation, the following assessment is completed. The assessment is in respect of the proposed allocation requirement of 400 homes, employment (Classes E(g), B2 and B8) and retail (Class E) uses and parking facilities for the railway station.

3.1.2 An assessment of the site and the key issues is set out below covering:

- **The local highway network**
- **The site access**
- **The likely traffic generation**

3.1.3 A further assessment of these matters against the individual policy requirements in Policy H2 is then set out in Section 4.

3.2 Local highway network

Papermill Lane

3.2.1 Papermill Lane is a rural lane without any footways, cycleways or street lighting. A footway commences on the southern side of Station Road circa 630m south of the Overton Mill main access.

3.2.2 The existing access to the Overton Mill site involves driving, walking and cycling through a tunnel under the railway line. The tunnel is of insufficient width to allow two-way traffic flow. A “shuttle working” system is required to manage traffic under the railway line and this has been in place for the previous employment use of the site and this is managed by a stop line on the northern side of the railway line with southbound traffic having to give way to northbound traffic.

3.2.3 A public Byway BOAT 21 runs north of the railway line within the site and the pedestrian facilities under the railway comprise a 1.3m wide “virtual” footway.

3.2.4 Site photographs of Papermill Lane are shown in **Image 3.1**, with more detailed photographs shown in **Image 3.5**.

Image 3.1: Papermill Lane



Source: i-Transport LLP site photographs (February 2024)

Station Approach

3.2.5 Station Approach routes north from Station Road towards Overton rail station. It is an unlit rural lane where no footways are present except for a circa 50m section on the western side of the carriageway immediately south of Copse Road. Typical conditions on Station Approach and the footway are shown in **Image 3.2**.

Image 3.2: Station Approach



Source: i-Transport LLP site photographs (February 2024)

Kingsclere Road (B3051)

- 3.2.6 Kingsclere Road (B3051) runs north to south connecting to the B3400 in the south and crosses over the railway line on the western edge of the site. Kingsclere Road narrows across the railway line and there is limited forward visibility with signs and slow markings to warn of “pedestrians crossing” and “on-coming vehicles in middle of road” as shown in **Image 3.3**.

Image 3.3: Kingsclere Road – looking south towards railway line



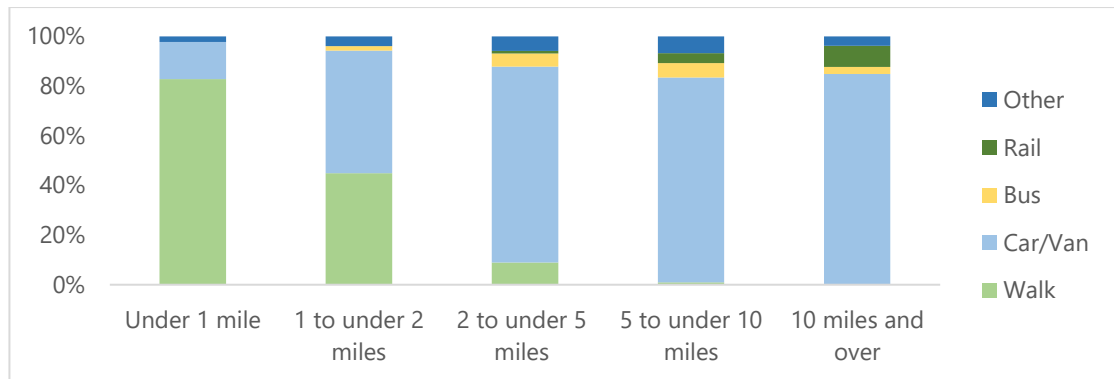
Source: Google street view imagery (May 2025)

- 3.2.7 In summary, the highway network around the site is subject to several constraints. There are a lack of formal pedestrian and cycle infrastructure and street lighting. Both Papermill Lane and Kingsclere Road have geometric constraints in terms of width, alignment and forward visibility. The railway tunnel on Papermill Lane is a particular constraint.

Accessibility to local facilities and services

- 3.2.8 In terms of accessibility, the site is located on the northern edge of Overton, and whilst some facilities are nearby (i.e. the train station) others are some distance from the site.
- 3.2.9 The National Travel Survey (NTS) 2020 identifies the mode share of journeys of different lengths (**Image 3.4**) and demonstrates that the vast majority (83%) of trips of up to one mile (1.6km) are undertaken on foot.

Image 3.4: Mode Share of Trips by Main Mode for Different Trip Lengths: England



Source: NTS 2020 (NTS0308)

3.2.10 The principal destinations for future residents of the site for leisure, retail, employment and education are summarised in **Table 3.1** below along with an assessment of whether they are within 1.6km of the site.

Table 3.1: Summary of Local Facilities and Services

Purpose	Destination	Overton Mill
		Within 1.6km Walk Catchment
Leisure	Sapley Lane Playing Field	-
	Skateboard Park	-
	Edward Kersley Playing Field	-
	The Greyhound	-
	Redfort Tandoori Restaurant	✓
	Red Lion Pub	-
	Library	✓
	The Old House at Home Pub	✓
	Little Meadow Recreation Ground	✓
	High Street Restaurants	✓
	Overton Recreational Ground	-
	Overton Town Meadow Golf Club	-
	Overton Community Centre	✓
	Marina School of Dance	✓
	Overton Allotments	-
Overton Community Orchard	✓	

Purpose	Destination	Overton Mill
		Within 1.6km Walk Catchment
	Lordsfield Swimming Club	-
	Berrydown Playing Fields	-
	Overton Hill Play Area	✓
	Foxdown Playground	✓
Employment	Overton United Football Club	-
	Hilltop Industrial Area	✓
	Station Approach Industrial Area	✓
Retail	Post Office	✓
	Cooperative	✓
	High Street Shops	✓
	The Village Bakery	✓
	SPAR Overton	-
Education	Overton Children's House Montessori Nursery School	-
	Overton C of E Primary School	-
Health	Overton Pharmacy	-
	Overton Surgery	✓
Total		17/32

Source: Consultant's Estimates (Google Maps measured from Centre of Site)

3.2.11 **Table 3.1** shows the site is within a reasonable walking distance (1.6km) of 17 out of 32 key facilities, but there are many facilities which are further and the "distance barrier" will need to be overcome by improvements to walking (and cycling) infrastructure between the site and these facilities. There is no detail in the published evidence base that such improvements have been considered or are deliverable.

3.3 Site Access

3.3.1 Policy H2 requires:

"safe and convenient access to be provided to the highway network, via Papermill Lane and Kingsclere Road (B3051)".

3.3.2 Whilst the policy requires “both access options being contingent on assessment by the highways authority for suitability and safety”, there are some significant issues with both points of access and there appears to be an absence of any clear evidence to suggest suitable accesses are likely to be achievable or agreeable with Hampshire County Council.

3.3.3 The potential to achieve safe and suitable access is assessed further below.

Papermill Lane

DeLaRue’s concerns

3.3.4 Firstly, it is relevant that when the mill was operational the owners (DeLaRue) had concerns about the suitability of the Papermill Lane access. The concerns were over the:

“Vulnerability of the railway bridge adjacent to the main access to the mill, should the bridge be damaged and obstruct access there would be no vehicular access to the site which would result in the closure of the mill” (Ref: **Appendix A** – letter from DeLaRue)

3.3.5 The concerns over the suitability of the Papermill Lane access were of such significance to DeLaRue that the owner submitted a planning application to create an emergency access onto Kingsclere Road.

3.3.6 The owners’ initial application (Ref: 17/00752) was refused on several grounds including highways – this Decision Notice is at **Appendix A**. A second application was approved under reference 17/03491/FUL. The approved application was specifically for the construction of an emergency only site access onto Kingsclere Road - which would be gated and only used in an emergency.

Widths and suitability

3.3.7 Papermill Lane access is constrained and using the diagram ONP Figure 4 (shown in **Image 1** of this report) as a guide, it is likely that primary vehicle and pedestrian / cyclist access to the H2 site will be via Papermill Lane. The access would require use of the “vulnerable railway bridge” and then Papermill Lane to access the highway network.

3.3.8 Papermill Lane itself is a rural unlit lane with no footways and as identified by DeLaRue has a particular constraint under the railway line.

3.3.9 The total width of hard surface under the railway bridge is 5.8m, this comprises a 1.3m wide virtual footway, 3.3m wide carriageway and 1.2m wide area of hatching as shown in **Image 3.5**.

Image 3.5: Overton Mill Access Under Bridge



Source: i-Transport LLP site photographs (February 2024)

3.3.10 To provide a carriageway under the railway bridge that can accommodate all users, the following minimum widths would be required:

- 1.5m footway = suitable to accommodate a pedestrian and another pedestrian with a pushchair / wheelchair (MfS Figure 6.8).
- 5.0m carriageway = lowest order adopted highway street (HCC TG1).
- Total = 6.5m width.

3.3.11 The widths listed above are likely to be the very minimum required and are in excess of the 5.8m wall to wall width which is available.

HCC design guidance

3.3.12 HCC's published design guidance identifies that:

- Primary Streets should be 6m wide
- Secondary Streets should be 5.5m wide
- Tertiary Streets should be 5.0m wide.

3.3.13 There is insufficient width available within the railway tunnel to provide a street design which meets HCC's published guidance.

3.3.14 In addition, there is not enough space within the railway tunnel to provide a dedicated footway.

3.3.15 In combination neither suitably wide two-way operating carriageway or pedestrian footway can be provided within the railway tunnel without major works to the railway bridge.

3.3.16 On this basis, it is likely that the Papermill Lane access to the site will remain a priority working system (as show in **Image 3.5**) which is clearly undesirable both for vehicle and Active Travel users and will have a "finite capacity" in terms of traffic movements.

Pedestrians

3.3.17 Pedestrian access via Papermill Lane is clearly constrained by the railway tunnel.

3.3.18 It is likely that a dedicated footway or significant improvements to both pedestrian and vehicle provision under the railway bridge be required by HCC to provide a safe and suitable access to the site and thus enable the delivery of 400 homes on the site.

3.3.19 There is no evidence that any testing or feasibility design has been completed and no certainty that a safe and suitable arrangement can be achieved, let alone one that prioritises the needs of walking and cycling in accordance with HCC's LTP4 Core Policy C3: Road User Utility Framework and the NPPF (paragraph 115 (a) and (b)).

Papermill Lane Access - Summary

3.3.20 In summary:

- The existing Papermill Lane vehicle access is not of sufficient width for two-way traffic.
- There is no ability to widen the road under the railway without reconstructing the bridge.
- It is therefore likely that the Papermill Lane access will remain a priority system which will have a finite capacity.
- It is also likely that this primary pedestrian access to site will be a continuation of the existing virtual footway, whereby vehicles and people need to share the same space as traffic.
- There maybe some potential for a narrow raised footway to be provided under the bridge (in associated with a continuation of the retained priority traffic system) which will require agreement with Network Rail as owner of the structure and even if this is achievable it will still provide a limited width footway for all pedestrian users.

Kingsclere Road

- 3.3.21 Kingsclere Road has no footway provision and has limited forward visibility to and from the south due to the road alignment over the railway line. This area of limited forward visibility is in the location where the diagram ONP Figure 4 (shown in **Image 1** of this report) indicates the site should be accessed.
- 3.3.22 The limited forward visibility is a result of the vertical alignment of Kingsclere Road as it crosses the railway line as shown in **Image 3.6** for northbound traffic on Kingsclere Road.

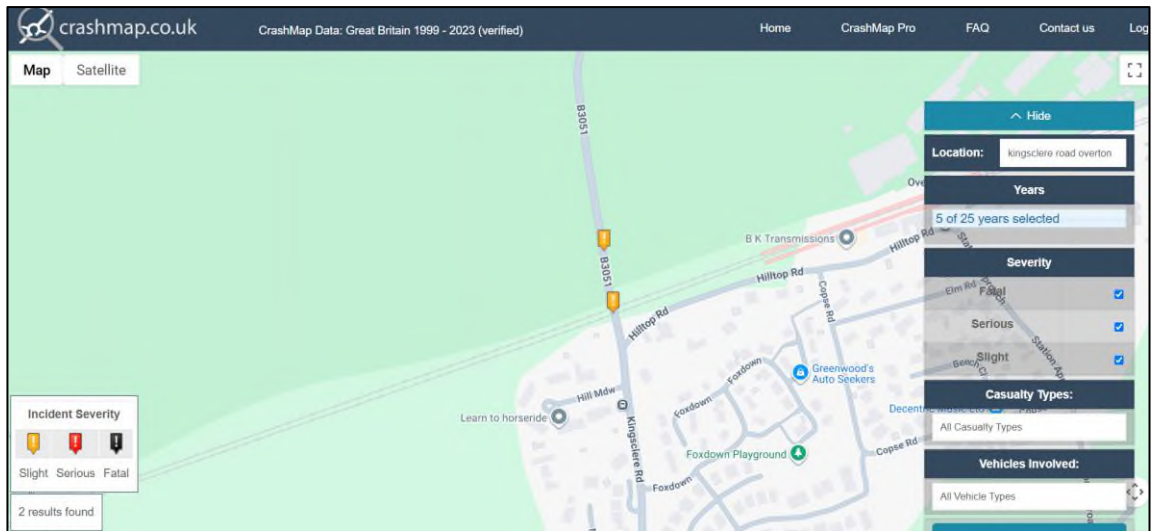
Image 3.6: Kingsclere Road northbound



Source: Google street view imagery (May 2025)

- 3.3.23 This location has been the subject of two recorded Personal Injury Accidents (PIA) in the most recent 5-year period as shown in **Image 3.7**.

Image 3.7: Personal Injury Accidents at Kingsclere Road rail bridge / site access



Source: Crashmap

- 3.3.24 There is no evidence in the NP to suggest these accidents have been reviewed or analysed, nor whether they could have implications for the allocation which relies on a new site access on Kingsclere Road.
- 3.3.25 The introduction of an all-purpose vehicle access (as opposed to an emergency access) into the site in this location will increase traffic on Kingsclere Road and importantly it will increase the likelihood of traffic slowing, stopping and potentially queuing on Kingsclere Road just north of the railway line, this could pose a significant safety risk due to the limited forward visibility from the south where northbound traffic would not be aware of any queuing traffic – as shown diagrammatically in **Image 3.8**.

Image 3.8: Potential safety concerns between northbound traffic and site access



3.3.26 It is also important to note that BDBC’s response to the Overton Neighbourhood Plan (Regulation 16) consultation noted:

“The LPA has concerns about the proposed vehicular access from Kingsclere Road (to the west of the site). This is likely to be unacceptable in both landscape and highway terms and is not supported by evidence” (Ref: BDBC response to ONP Reg 16 – page 7)

“Policy H2 (criterion xxi) continues to refer to the provision of a new access from Kingsclere Road (B3051) but this still does not appear to be supported by any landscape or transport evidence. Instead, an additional sentence has been added to criterion xxi) of the policy stating that the access points (Papermill Lane and Kingsclere Road) ‘will be contingent on assessment by the highways authority for suitability and safety’. It is considered that this issue should be resolved at the plan-making stage and that criterion xxi and the concept plan should be updated to remove the all-modes access from the B3051. It could nonetheless be retained as an emergency access” (Ref: BDBC response to ONP Reg 16 – page 7 and 8)

3.3.27 Furthermore, the ONDP Consultation Statement notes that HCC (the Local Highway Authority) states:

“that the viability of the access from Kingsclere Road requires investigation”

3.3.28 There is no evidence that any viability testing or design work has been completed and the delivery of an all-purpose access to Kingsclere Road must remain a significant doubt.

Kingsclere Road Access - Summary

3.3.29 In summary, there are serious concerns over the safety, practicality and the deliverability of an access to the site from Kingsclere Road. These concerns are shared by both BDBC and HCC and there should be little, if any reliance on the site being able to deliver a safe and suitable access to Kingsclere Road.

3.4 Traffic Generation

3.4.1 Using typical traffic generation forecasts which have been agreed with Hampshire County Council for other proposals in Overton, a development of 400 homes alone (i.e. with no allowance for employment uses) is likely to result in some 235 vehicle movements in the typical peak hours as set out in **Table 3.2**.

Table 3.2: H2 Site - Residential Vehicle Trip Generation

	Morning Peak Hour 08:00 – 09:00			Evening Peak Hour 17:00 – 18:00		
	Arr	Dep	Total	Arr	Dep	Total
Vehicle Trip Rate	0.176	0.421	0.597	0.383	0.206	0.589
Vehicle Trip Generation (400 Dwellings)	70	168	239	153	82	236

Source: TRICS

3.4.2 There is no traffic assessment work available to demonstrate whether this level of traffic can be accommodated on either Papermill Lane or Kingsclere Road.

3.4.3 Given the significant doubt over whether an access can be achieved onto Kingsclere Road, it is likely that all of this traffic will use Papermill Lane which is a rural lane with no footway provision and therefore the primary pedestrian access to site will be a continuation of the existing virtual footway arrangement, whereby vehicles and people share the same space, both under the railway tunnel and on Papermill Lane itself.

3.4.4 To understand how safe and suitable this is, it is helpful to look at the study presented on page 83 of MfS which sets out:

“there is a self-limiting factor on pedestrians sharing space with motorists of around 100vph. Above this, pedestrians treat the general path taken by motor vehicles as a ‘road’ to be crossed rather than a space to occupy”.

3.4.5 A development of 400 homes on the Overton Mill site is anticipated to generate circa 235 vehicle movements in the peak hours. Assuming all of this traffic uses Papermill Lane then an exercise has been undertaken to determine how many dwellings could be accommodated before a threshold of 100 vehicles per hour using the Papermill Lane railway tunnel is exceeded.

3.4.6 The vehicle trip generation profile has been assessed for different quantum of dwellings excepting that some of the new homes will be located to the south of the railway line. The assessment has been completed for 12-hours, between 07:00 and 19:00 and the results are presented in **Table 3.3**.

Table 3.3: Overton Mill - Vehicles per Hour (Residential Only) – Two-Way

Time	400 Dwellings (100%) – traffic per hour	300 Dwellings (75%) – traffic per hour	200 Dwellings (50%)– traffic per hour
07:00	157	118	78
08:00	239	179	119
09:00	144	108	72
10:00	138	103	69
11:00	147	110	74
12:00	143	107	72
13:00	136	102	68
14:00	154	116	77
15:00	219	164	110
16:00	200	150	100
17:00	236	177	118
18:00	178	134	89

Source: TRICS / Consultant's Calculations

3.4.7 In summary, if 300 dwellings are required on the northern part of the site (approx. 75% of the draft allocation) then more than 100 vehicles will use the railway tunnel in every hour of the day i.e. greater than the level where shared surfaces are generally accepted.

3.4.8 Even if just 200 homes are delivered on the northern part of the site with access via Papermill Lane then the level of traffic using the Papermill Lane railway tunnel will exceed 100 vehicles per hour in the four busiest hours of the day – including those hours where most people will be walking to school and work.

3.4.9 In summary, even if the smaller southern part of the site (i.e. that part south of the railway line) were to accommodate 100 homes there would still be 300 homes that would require access via the narrow tunnel. In this situation the continuation of the current “shared space” environment would not be acceptable with there being significantly more than 100 vehicles per hour using the tunnel for every hour of the day. Even if assuming just 200 homes are provided to the north of the railway, the conditions under the railway tunnel on Papermill Lane would not meet generally accepted conditions for a shared surface environment.

3.4.10 Overall, there is significant doubt as to whether anything like 400 homes can be safely accommodated on the site from a highways and transport perspective and there is no evidence whatsoever provided to support this scale of allocation.

SECTION 4 Summary assessment and further work needed

4.1 Summary

4.1.1 This report has provided a transport focused review of the Submission Overton Neighbourhood Plan (ONP) and specifically the site allocation Policy H2 – Land at Portals Mill.

4.1.2 There are a number of concerns raised with the viability of providing safe and suitable access to a development of 400 homes and numerous other uses on the site, including:

- The significant doubts over a suitable access being achieved from Kingsclere Road.
- The absence of any identified walking and cycling improvements to key local facilities.
- The likely requirement for all traffic to use the narrow/vulnerable railway tunnel on Papermill Lane.
- The ability of the Papermill Lane access to accommodate the level of traffic associated with 400 homes.
- The likelihood that all pedestrian and cycle movements from homes on the northern part of the site will need to share the carriageway with traffic under the narrow/vulnerable railway tunnel on Papermill Lane.
- Likelihood that the transport related capacity of development on the northern part of the site is 200 homes or less.

4.2 Further work needed

4.2.1 Given significant number and importance of the concerns raised over the suitability of the site and its access arrangements - both in terms of highway safety and delivery, it is recommended that further work is completed at this plan making stage for the allocation to be sound at the scale proposed.

4.2.2 Whilst there is no doubt that some development can be achieved on the site (given its previous use) there is no evidence that the site can accommodate the transport demands from the range of uses which Policy H2 requires. By contrast, the assessment completed in this report suggests that the northern part of the site is likely to be able to accommodate 200 homes or less.

4.2.3 Based on the above, **Table 4.1** presents all the highways and transport elements of *Policy H2 – Land at Portals Mill* and provides a summary assessment of each part against the evidence presented in this report and sets out the further work needed to be able to rely on the site delivering 400 homes.

Table 4.1: Overton Mill – Assessment and further work needed to support allocation

Policy text	Assessment
<p><i>Make provision for the delivery of: a. Approximately 400 homes including 5% serviced plots for custom and self-build homes; b. Employment (Classes E(g), B2 and B8) and retail (Class E) uses; and c. Parking facilities for the railway station</i></p>	<p>There is no certainty that an access can be delivered from Kingsclere Road with both BDBC and HCC having significant concerns over it.</p> <p>Papermill Lane has no footways and includes a narrow shared-surface tunnel which is unable to safely accommodate the traffic from 400 homes (let alone any traffic from the Employment or Retail uses) when assessed against national highways guidance in Manual for Streets or HCC’s local guidance.</p> <p>Further work needed: The concept plan should be updated to remove the all-modes access from Kingsclere Road, or if it to be retained then at the very least the conceptual agreement of HCC to such an access to be secured. In addition, it is essential that some assessment or design work is completed for the access arrangement under the Papermill Lane railway tunnel to demonstrate there is potential for a safe and suitable arrangement to be provided.</p>

Policy text	Assessment
<p>(iii) The site will <i>“Ensure that the development will not have a severe adverse impact on the local highway network nor have an unacceptable impact on highway safety with the inclusion of suitable measures to mitigate the impact”</i></p>	<p>There is no assessment of the traffic generation of the mill site when it used as a paper mill. There is no assessment of the likely traffic associated with the proposed allocation and therefore no impact assessment of the site is presented as part of the NP.</p> <p>Road safety does not appear to have been considered either in respect of the proposed access to Kingsclere Road (which is proposed at the location of two recent injury accidents and where there is limited forward visibility) or in respect of pedestrian safety under the narrow railway tunnel where it is likely that all vehicle traffic from that part of the site will be required to route.</p> <p>Further work needed: Some initial traffic assessment work is required to have any confidence that 400 homes can be delivered on the site given the constrained access arrangement under the Papermill Lane railway tunnel. It is likely that some information will be available from the site promotor or previous owner on the level of traffic associated with the mill use and at the very least this should be made available for review by interested parties and HCC in order to demonstrate the allocation is sound.</p>
<p><i>Demonstrate how ways to reduce the need to travel, prioritise and maximise the use of active travel and public transport use have been considered to minimise the transport impacts arising from the development</i></p>	<p>Active travel assessments appear to be entirely absent from the NP documentation with no proposals to provide for, let alone prioritise and maximise the use of active travel particularly walking.</p> <p>Further work needed: Some initial feasibility work should be completed of the potential for any pedestrian enhancements, particularly at points of constraint, such as under the Papermill Lane railway tunnel and on Kingsclere Road and also to improve routes to facilities within and beyond 1.6km.</p>

Policy text	Assessment
<p><i>Ensure that safe and convenient access will be provided to the highway network, via Papermill Lane and Kingsclere Road (B3051). Both access options will be contingent on assessment by the highways authority for suitability and safety ;</i></p>	<p>Despite concerns by both BDBC and HCC, there is no evidence that safe and convenient access can be provided to either Papermill Lane or Kingsclere Road. Access to the site at both locations is constrained. There is considerable doubt over whether an access to Kingsclere Road can be achieved at all and the Papermill Lane access will have a finite capacity which is likely to be far less than the 400 homes proposed unless separate and safe pedestrian facilities under the railway tunnel can be provided.</p> <p>Further work needed: The concept plan should be updated to remove the all-modes access from Kingsclere Road, or if it to be retained then at the very least the conceptual agreement of HCC to such an access to be secured. In respect of Papermill Lane, initial feasibility work should be completed to determine the potential for any pedestrian enhancement to be achieved under the Papermill Lane railway tunnel.</p>
<p><i>Make provision on site for a dedicated network of segregated walking and cycle routes that integrate with existing and proposed external routes and to the wider Public Rights of Way network.</i></p>	<p>No proposals for segregated walking or cycling are identified or proposed and there are considerable constraints which mean it is unlikely that any can be achieved.</p> <p>Further work needed: Some initial feasibility work should be completed of the potential for any pedestrian enhancement, particularly at points of constraint, such as under the Papermill Lane railway tunnel and on Kingsclere Road.</p>

APPENDIX A. DeLaRue letter on Vulnerability of the Papermill Lane access and Decision Notice



DeLaRue

Director of Planning
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DE LA RUE INTERNATIONAL LIMITED

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1 February 2017

Dear Sirs

OVERTON MILL – BUSINESS CONTINUITY

Overton Mill is the leading Global Specialist in providing high quality water marked security paper for integration into bank notes.

The Mill supplies paper to over 100 countries worldwide, including the Bank of England and as such is of National Strategic Importance.

The facility employs approximately 400 staff and operates a 24 hour shift throughout the year and relies on 24 hour access to the site for the supply of raw materials for its manufacturing and the delivery of bank note paper often to specific time lines.

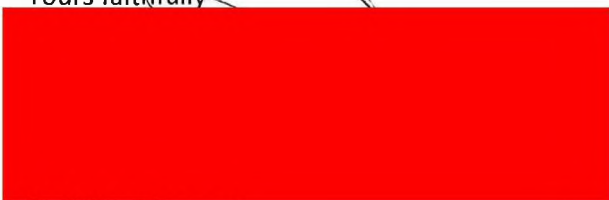
As part of its Business Continuity impact analysis, the Mill has identified the vulnerability of the railway bridge adjacent to the main access to the Mill. Should the railway bridge be damaged and obstructing access to the Mill there would be no vehicular access to the site which would result in the closure of the Mill.

The only practical location for an alternative access is north of the railway line on the B3051.

The intention is to obtain consent for a new access onto the Highway; if the access was ever needed aluminium tracking would be used from the Highway to the Mill perimeter

Thank you for considering this application, we look forward to your response in due course.

Yours faithfully



Facilities Manager

Email: [REDACTED]



Basingstoke
and Deane

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REF:17/00752/FUL

Mr Richard Goodall
Advoco Planning Limited
14 Oak Hill
Alresford
Hampshire
SO24 9LB

NOTICE OF REFUSAL

Town & Country Planning Act 1990

Town & Country Planning (Development Management Procedure) (England) Order 2015

In pursuance of its powers under the above mentioned Act, the Council as Local Planning Authority hereby REFUSES planning permission for the:

Proposal: Construction of emergency site access onto Kingsclere Road
Location Overton Mill Papermill Lane Overton RG25 3JG
Applicant: De La Rue International

in accordance with your application, plans and particulars which were received on 27th February 2017 for the following reasons:

1. The proposed development would result in the removal of significant area of the boundary hedgerow (which at this point is designated as a Site of Nature Conservation (SINC)) to the B0351 both at the site of the proposed access and immediately opposite. This would have an adverse impact on both the landscape character and visual amenity of the area and the setting of the North Wessex Downs Area of Outstanding Natural Beauty. As such the proposal would not be in accordance with Policies EM1 and EM4 of the Basingstoke and Deane Local Plan 2011-2029 or with Section 11 of the NPPF (2012).
2. The proposed development would result in the removal of a significant length of species rich grassland termed by HBIC as a Road Verge of Ecological Importance alongside the B3051, which is part of the B3051 Kingsclere Road, Frost Hill Site of Importance for Nature Conservation and will harm that site in terms of its biodiversity. Accordingly the proposal is not in accordandance with Policy EM4 of the Basingstoke and Deane Local Plan 2011-2029 and Section 12 Of the NPPF (2012)

3. The application has failed to satisfactorily demonstrate that appropriate visibility splays have been, or can be provided in order to ensure the safety of the proposed access or that the dimensions and geometry of the access is adequate to accommodate the scale and nature of the vehicles likely to utilise it. As such the proposed development would not comply with Policy CN9 of the Basingstoke and Deane Local Plan 2011-2029 or with Section 7 of the NPPF (2012).

Notes to Applicant

1. In accordance with paragraphs 186 and 187 of the National Planning Policy Framework (NPPF) in dealing with this application, the Council has worked with the applicant in the following positive and proactive manner:-

- seeking amendments to the proposed development following receipt of the application;

In this instance:

- the applicant was updated of any issues after the initial site visit,

In such ways the Council has demonstrated a positive and proactive manner in seeking solutions to problems arising in relation to the planning application.

The officer's report can be viewed on the council's website www.basingstoke.gov.uk.

To help the council continually improve the planning and development service please take a few moments to share your feedback with us at <http://www.basingstoke.gov.uk/planning-service-survey>. Responses will remain anonymous. Thank-you.



Planning and Development Manager

Date: 28 April 2017

It is important that you read the notes overleaf

NOTIFICATION - APPEALS TO THE SECRETARY OF STATE

17/00752/FUL

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

If you want to appeal against the local planning authority's decision then you must do so within 6 months of the date of this notice.

However, if

- (i) this is a decision on a planning application relating to the same or substantially the same land and development and is already the subject of an enforcement notice, and you want to appeal against your local planning authority's decision on your application, then you must do so within 28 days of the date of this notice; or,
- (ii) an enforcement notice is subsequently served relating to the same or substantially the same land and development as in your application and if you want to appeal against the local planning authority's decision on your application, then you must do so within:
 - 28 days of the date of service of the enforcement notice, *or*
 - within 6 months of the date of this notice, whichever period expires earlier; or,
- (iii) this is a decision to refuse planning permission for a minor commercial application you must do so within 12 weeks of the date of this notice.

Appeals can be made online at: <https://www.gov.uk/planning-inspectorate>.

If you are unable to access the online appeal form, please contact the Planning Inspectorate to obtain a paper copy of the appeal form on tel: 0303 444 5000.

The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

Purchase Notices

- If either the local planning authority or the Secretary of State/National Assembly for Wales* refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.
- In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London or county or county borough in Wales) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.



IN THE MATTER OF THE SUBMISSION OVERTON NEIGHBOURHOOD PLAN

OPINION

Introduction

1. The draft Overton Neighbourhood Development Plan 2025-2040 (“**the ONP**”) was submitted to Basingstoke and Deane Borough Council (“**the Council**”) on 21 July 2025. The ONP is now the subject of a public consultation pursuant to regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (“**the NP Regs**”), ending on 16 October 2025.
2. We are instructed by Bargate Homes (“**Bargate**”) to give our opinion as to the lawfulness of the ONP. In particular, we will consider whether the ONP is in breach of the “basic conditions” in para. 8(2) of Sch. 4B to the Town and Country Planning Act 1990 (“**the 1990 Act**”) (which apply to neighbourhood plans pursuant to section 38A of the Planning and Compulsory Purchase Act 2004 (“**the 2004 Act**”).

Summary

3. For the reasons given below, we do not see how an examiner could rationally exercise their planning judgment to conclude that the “basic conditions” in paras. 8(2)(a), (d) and (f) of Sch. 4B to the 1990 Act have been met by the ONP. That is because:
 - (1) Having regard to national policy on the importance of deliverability and significantly boosting the housing supply, it cannot be “appropriate” to rest the totality of Overton’s housing contribution on a single brownfield site with significant concerns over viability and deliverability, with no recognition of the recent major uplift in the indicative housing requirement.
 - (2) The environmental report and habitats regulation assessment (required by assimilated, formerly European, law) fail to conduct a legally adequate

assessment of reasonable alternatives and are predicated on an out-dated assumption as to the quantum of development being allocated (and also a mistaken belief as to consistency with the local plan).

- (3) The report by i-Transport on behalf of Bargate identifies significant highway safety, capacity and accessibility concerns that undermine the sustainability of the proposed allocation in policy H2 of the ONP.

Background

4. The local development plan is the Basingstoke and Deane Local Plan 2011-2029 (“**the LP**”), which was adopted on 26 May 2016. This identified a need for 850 new homes per annum for the plan period, and made provision for that need to be met (see policy SS1). Para. 4.27 of the LP explained that, given the size of the village of Overton, the level of facilities and services available and its link to higher order services, and the level of local housing need, a greenfield site allocation was included in the LP to deliver approximately 120 new homes. In addition, policy SS5 provided that it would be necessary to identify sites in Overton for at least 150 homes through the neighbourhood planning process.
5. Policy SS6 restricts new housing in the countryside outside settlement boundaries.
6. Overton is a village in North Hampshire. It has a railway station which is on the main line between Exeter and London. The ONP, if made, will supersede the previous Overton Neighbourhood Plan made on 21 July 2016. That previous plan allocated land across four sites for approximately 150 homes (see policy H2), as required by policy SS5 of the LP. Two of those sites have delivered a total of 137 homes.
7. The Portals Paper Mill in Overton (“**Overton Mill**”) closed in 2023, and was promoted as a redevelopment opportunity. It was assessed by Portals’ consultant CBRE as suitable for approximately 340 homes.
8. In January 2024, the Council published for consultation their draft Basingstoke and Dean Local Plan Update 2021-2040 for consultation pursuant to reg. 18 of the

Town and Country Planning (Local Planning) (England) Regulations 2012 (“**the LP Regs**”). This draft plan was prepared on the basis of a local housing need figure of 850 homes per annum, and relied upon a settlement study which identified a requirement of 250 new homes in Overton across the plan period.

9. The draft plan accordingly allocated in policy SP5.10 the brownfield / previously-developed site of Overton Mill for approximately 340 homes, which would have met the needs of Overton in full, with 90 homes going towards the housing need of Whitchurch. The policy contained a number of detailed requirements to be met by any future development, reflecting the constraints operating on the site. The draft allocated site was split into two, bisected by the train station and railway line. The land to the north contains the now disused paper mill and associated office buildings, and the land to the south includes a former water treatment facility associated with the mill.
10. The Site Selection Report (2023) underpinning the draft plan noted at p. 41 that “given the site is occupied by a Paper Mill, there will be some remediation required associated with former industrial use, site demolition and clearance”. It also identified noise impacts from the railway line, train station and nearby industrial uses, together with “a number of environmental sensitivities for the site”. It received negative scores for landscape, heritage, biodiversity and flooding. Part of the site was identified as falling within the North Wessex Downs National Landscape. The Site Selection Report stated that “this is a redundant brownfield site that is available and likely to be achievable, albeit there are likely to be some abnormal costs associated with remediation of the previous use which may affect viability”. In addition, “the need to protect and mitigate landscape, biodiversity and heritage impacts may affect site capacity and a yield of 340 dwellings is considered reasonable”.
11. Similar analysis of the Overton Mill site can be found in Appendix 5 to the Strategic Housing and Economic Land Availability Assessment (2023) (“**SHELAA**”).

12. Before the draft local plan could be taken further, the Government published the revised National Planning Policy Framework in December 2024 (“NPPF”). This introduced a new methodology for calculating local housing need, which resulted in the housing need figure for the area significantly increasing to 1,127 dwellings per annum. The Council is now considering the implications of the new NPPF and, according to the updated Local Development Scheme (February 2025), intends to submit a local plan for examination by December 2026.
13. It follows from the increased housing need figure that the strategic housing policies in the LP are out-of-date because they are predicated on an out-dated assumption as to the need for new homes. The Council’s own figure for the housing land supply is 2.94 years, i.e. significantly below the 5 years required by the NPPF.
14. In the course of preparing the emerging draft ONP, Overton Parish Council (“OPC”) asked the Council in June 2025 to provide an “indicative” housing requirement figure for the Overton area, pursuant to NPPF para. 70. This paragraph provides that such an “indicative” figure should be provided where it is not possible to provide a requirement figure through strategic policies in a local plan (e.g. “in instances where strategic policies for housing are out of date” – see footnote 33).
15. The Council responded on 3 July 2025 that the indicative figure – at that time – was 250 homes for Overton. As the Council’s letter explained, this figure was based on the 2023 Settlement Study figure of 250 homes (as at 1 April 2023). The Council acknowledged that the new NPPF “increased the borough’s overall housing requirement” but stated:

“However, at this stage, the LPA has not yet determined how this will be met, and therefore the 2024 Regulation 18 Plan (and its evidence base) provides the most recently available planning strategy for the area. The LPA is due to consult upon a new Regulation 18 draft Local Plan in winter 2025/6, which will include a revised spatial strategy, but at this stage it is not possible to set out the details of any revisions.

It is therefore the LPA’s view that Overton’s current indicative housing requirement is a minimum of 250 dwellings. It is recognised that the ongoing Local Plan process

provides some future uncertainty, so it is strongly advised that the parish council progresses the plan as quickly as possible.”

16. The Council added:

“It should be noted that even if the parish’s indicative housing requirement was to increase as a consequence of the Local Plan process progressing (prior to the neighbourhood plan being adopted), this would not be likely to affect whether the plan met the ‘basic conditions’. The particular impact would be upon whether the plan was still considered to contain ‘policies and allocations to meet its identified housing requirement’, and so trigger the additional protections from speculative development provided by NPPF para 14.”

17. The ONP accordingly has been published for consultation on the basis of an indicative requirement of 250 homes. To meet that requirement, it allocates Overton Mill for development, subject to compliance with a largely identical set of requirements to what was contained in the former reg. 18 draft local plan. However, policy H2 of the ONP has increased the approximate number of homes from 340 (in the draft local plan and in an earlier pre-submission version of the ONP) to 400.

18. The ONP is accompanied by an environmental report (“**the Environmental Report**”), a basic conditions statement (“**BC Statement**”) and a habitats regulations assessment report (“**the HRA Report**”). The BC Statement at para. 8 provides:

“The emerging local plan set a housing requirement of 250 for Overton, but was produced prior to the increased housing requirement for the district announced in December 2024. In accordance with government policy set out in the NPPF5 and Planning Practice Guidance, OPC has obtained an up to date indicative housing requirement from Basingstoke and Deane Borough Council (‘BDBC’) which confirms an indicative housing requirement of at least 250 dwellings. For the avoidance of doubt, although it remains at 250 this figure is now derived from BDBC’s post December 2024 assessment of the appropriate housing requirement for Overton. The ONP provides for more than 250 dwellings and is therefore consistent with this requirement. Based on the best information currently available this will ensure that the ONP aligns with the given housing requirement for Overton when the next iteration of the emerging plan is produced.”

19. In relation to Overton Mill, the BC Statement provides as follows:

“10. An important consideration for the parish council has been the future of the Portals Mill site in the north of the village. Portals Mill was a paper-making plant which specialised in the production of paper for banknotes and other secure

documents. Its owner announced the closure of the plant in 2022 and an orderly winding down of operations has taken place since then. The site has subsequently been promoted as a sustainable location for residential redevelopment. Portals Mill will be included as an allocation in the BDBC emerging local plan but it will be allocated first by the ONP.

11. Portals Mill was initially considered likely to be able to accommodate 340 dwellings. This has subsequently been updated to a figure in the region of 400. Even if the final site capacity after detailed design and masterplanning were to fall well below this, there is still a substantial margin over and above the parish housing requirement. The reuse of a brownfield site in a sustainable location is entirely in accordance with national planning policy and the site can only be redeveloped as a whole.”

20. The BC Statement also states:

“13. ONP has considered alternative and additional site allocations put forward as suitable for development during consultation on the ONP. No other sites have been included because:

- they are not necessary to meet the indicative housing requirement for the neighbourhood area identified by BDBC;
- development over and above Portals Mill would place an unnecessary and unsustainable strain on local infrastructure; and
- redevelopment of a brownfield site in a sustainable location is a sequentially better alternative than other options when applying local and national planning policy

14. This selection process was tested and reviewed by the Strategic Environmental Assessment (‘SEA’) prepared independently by AECOM which supported the choice of the Portals Mill site as being the most suitable alternative of those available.”

21. The Environmental Report considers reasonable alternatives to the Overton Mill allocation (assuming it as being for 340 homes) for meeting the minimum 250 home requirement. The Report assesses three options (see page iv):

- (1) The single allocation at Overton Mill;
- (2) A combination of two or more sites located surrounding the Foxdown settlement area;
- (3) A combination of two or more sites surrounding the Overton settlement area.

22. At page vii, the Environmental Report states:

“The Parish Council’s preferred approach is to progress Option 3 and allocate the Overton Mill site (also known as Portal’s Mill). This is in support of the current strategic directions of the Local Plan and adopts a brownfield-first approach.

Development at this location would provide future residents with the benefit of easy access to the rail station and benefit existing residents with additional car parking connected to the station, as well as additional new community infrastructure, which has been highlighted as sustainability merits through the SEA process. Community consultation to date has also demonstrated a local preference for development at this site.”

23. The effects under different topics are assessed and the Report concludes that the draft ONP performs well by avoiding significant negative effects.
24. The HRA Report is also predicated on the draft allocation being for approximately 340 homes (rather than 400).
25. On 4 September 2025, the Council’s Economy and Infrastructure Committee met to consider the updated proposed Spatial Strategy for how the borough would meet the increased housing requirement set by the 2024 NPPF. This was supported by an updated draft Settlement Study which identified and evidenced housing requirements for the rural settlements. This identified an increased housing requirement of 410 homes for Overton (i.e. an increase of 160 homes). The Settlement Study considers Overton in section 5.2, noting that it is a “Large Village” in the hierarchy, due to relative sustainability, scale and provision of services and facilities. At para. 5.2.14, the study states:

“As demonstrated by the evidence supporting the proposed neighbourhood plan site allocation ... it is considered that the environmental sensitivities on/around Overton Mill can be overcome through the detailed design process. Many of the other promoted sites have a range of environmental sensitivities, which may limit their potential for development”.

26. The updated Spatial Strategy report confirms on p.18 that, if the ONP allocates Overton Mill, an emerging local plan update would not.
27. Shortly after this, the Council made representations to the reg. 16 consultation for the ONP, in which they made clear at para. 3.3 that they were not considering whether the draft ONP meets the basic conditions, an assessment which would take place after the examination.
28. The Council referred to the updated 410 figure for Overton at para. 3.8 and at para. 3.9 stated:

“Although the spatial strategy has not yet been considered by Cabinet, prior to proposed statutory consultation (Regulation 18) later in the year, it is considered that this provides the most up-to-date indication of the council’s planning strategy and should therefore inform the parish’s ‘identified housing requirement.’”

29. In other words, 410 homes is now the “indicative” housing requirements for Overton pursuant to NPPF para. 70.
30. The Council’s representations support the allocation of Overton Mill and state that this allocation – together with windfall development – would ensure the plan “contains policies and allocations to meet its identified housing requirement” (as stated in NPPF para. 14(b)). At the same time, the Council expressed some concerns about whether the identified capacity of 400 homes can be satisfactorily accommodated. It states that “justification for this increase in yield is needed to ensure that any development would be in keeping with the established character of Overton”.

Legal framework

31. When an examiner is appointed to carry out an examination of the ONP, the examiner will be required to consider whether the ONP meets the “basic conditions” in para. 8(2) of Sch. 4B to the 1990 Act: see para. 8(1). In making their report, the only modifications that may be recommended by the examiner are (so far as relevant) modifications that the examiner considers need to be made to secure that the ONP meets the “basic conditions”.
32. The “basic conditions” include (so far as relevant to the present case):
 - (1) “[H]aving regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order” (para. 8(2)(a));
 - (2) “[T]he making of the order contributes to the achievement of sustainable development” (para. 8(2)(d));
 - (3) “[T]he making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority” (para. 8(2)(e));

- (4) “[T]he making of the order does not breach, and is otherwise compatible with, assimilated obligations” (para. 8(2)(f)).
33. The legal principles in connection with the basic conditions are well-established, namely:
- (1) The question as to whether the “basic conditions” are met is a matter of planning judgment for the local planning authority, subject to review by the court in accordance with the principles of public law: see *R (Kebbell Developments Ltd) v Leeds City Council* [2018] 1 WLR 4625 at [34] per Lindblom LJ.
 - (2) The requirement to “have regard” to national policy is to be contrasted with the requirement for local plans to be “consistent with national policy”: see *BDW Trading (t/a Barratt Homes) v Cheshire West & Chester BC* [2014] EWHC 1470 (Admin) at [84] per Supperstone J;
 - (3) Evaluating the overarching policies and proposals of a neighbourhood plan will be a necessary exercise, but “where ... a neighbourhood plan contains site-specific proposals, then it will be proper, if not essential, for the examiner additionally to consider those proposals individually against the basic conditions”: see *R (Swan Quay LLP) v Swale BC* [2017] EWHC 420 (Admin) at [33] per Dove J.
34. For the avoidance of doubt, the “assimilated obligations” referred to in para. 8(2)f include:
- (1) the obligations contained in the Environmental Assessment of Plans and Programmes Regulations 2004 (“**the SEA Regs**”), which will apply to a neighbourhood plan if it is likely to have a significant effect on the environment, e.g. by allocating one or more sites for development. Reg. 12 of the SEA Regs requires the preparation of an environmental report which “shall identify, describe and evaluate the likely significant effects on the environment of: (a) implementing the plan or programme; and (b) reasonable

alternatives taking into account the objectives and the geographical scope of the plan or programme”.

- (2) Obligations under the Conservation of Habitats and Species Regulations 2017 (“**the Habitats Regs**”), which requires the Council, before authorising the ONP, to make an appropriate assessment of the implications of the ONP upon protected European sites in view of conservation objectives.

Analysis

35. As the case law above establishes, it is necessary to assess whether policy H2 of the ONP, which allocates Overton Mill, meets the basic conditions, which include whether it is appropriate to make the ONP having regard to national policy.
36. We draw particular attention to the following policies in the NPPF:
 - (1) “Plans should be prepared positively, in a way that is aspirational but deliverable” (emphasis added) (NPPF para. 16(b));
 - (2) “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals” (NPPF para. 32);
 - (3) “Plans should set out the contributions expected from development. ... Such policies should not undermine the deliverability of the plan” (NPPF para. 35).
 - (4) “Planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability” (NPPF para. 72).
 - (5) “Planning policies ... should support development that makes efficient use of land, taking into account ... local market conditions and viability” (NPPF para. 129(b)).

37. As these policies demonstrate, it is a core tenet of national planning policy that sites should only be allocated for development where it can be evidenced that the allocation (subject to any necessary infrastructure requirements and environmental constraints) is deliverable.
38. On any view, Overton Mill is a highly constrained site (as evidenced above) with abnormal costs associated with the previous industrial use of the site. It is therefore especially necessary for such a site to be underpinned by sufficient evidence of deliverability. That is particularly the case given the ONP inexplicably increases the quantum from 340 to 400 homes (a matter which has caused concern on the part of the Council).
39. Notwithstanding the importance of such evidence, it is conspicuously absent from any of the available material supporting the ONP (or any other material). There is evidence relating to all the benefits that would arise from development of the site, and how the many environmental constraints can be addressed in detailed design of the scheme, but no attempt whatsoever to consider the implications of this for the viability and overall deliverability of the scheme. NPPF para. 35 is clear that the expected contributions must not undermine the deliverability of the plan. This is for good reason: to avoid future applications seeking to avoid making such contributions on viability grounds.
40. This is particularly alarming given that the promoter of the site itself, Portals Paper Limited, pursuant to the reg. 18 consultation for the emerging local plan in 2024 and the reg. 14 consultation for the ONP, has advanced a significant number of fundamental criticisms regarding the many draft requirements in policy H2, on viability/deliverability grounds. The Turley representations deal with this in some detail.
41. The deliverability concerns surrounding Overton Mill, which are set out by Turley at length, appear to have been entirely overlooked in the evidence base, including the BC Statement and the Environmental Report. The latter proceeds on the basis that all of the alternatives will have “significant positive effects” on community

wellbeing through meeting housing needs. But that is not the case if the Overton Mill allocation wholly or partly fails to come forward on deliverability grounds, or alternatively comes forward without meeting some of the policy requirements, either of which is going to have implications for the assessed impacts. By way of example, the repeated concerns of the site promoter about remediation costs cast significant doubt over whether, if a development does come forward, it will be able to meet the policy requirement for 40% affordable housing. The BC Statement is entirely silent on the issue of deliverability, indicating that no regard has been had to this issue in preparing the NP.

42. In addition to our significant concerns regarding policy H2 of the ONP, we would make the following observation regarding the change in the indicative housing requirement. Even if the Overton Mill site were deliverable, the ONP allocated 400 homes on the basis of an indicative housing requirement of 250. This kind of buffer makes sense when assessed against national policy given (a) inevitable uncertainties over deliverability, (b) potential future changes in the level of need, (c) the 250 figure being a “minimum”, (d) the Government’s aim to significantly boost housing in the UK, and (e) the suitability of Overton as a location for growth.
43. If the indicative housing requirement increases, namely from 250 to 410, it defies reason to keep the allocation the same rather than introduce a corresponding uplift. The buffer is completely wiped out (and indeed there is a shortfall). There is no flexibility, and no account taken of the 410 figure also being a “minimum”. The evidence is replete with indications that Overton is a sustainable location for new housing development, compared with many other locations in the borough.
44. As to the Environmental Report, the assessment of reasonable alternatives is deficient. It groups a number of sites together into one alternative without properly assessing the relative benefits and harms of each, or meaningfully comparing the sites with each other. As noted already above, the consideration of alternatives pays no regard to relative deliverability, and it also appears to overlook the significant sustainability concerns surrounding the Overton Mill site as outlined by i-Transport. It is overly broad-brush in terms of assessing the effects

of developing the different sites in Overton. It is also crucially tied to assessing alternatives for meeting an assumed requirement of 250 homes, rather than a requirement of 410 homes. Had the environmental assessment been based on the latter, one would have expected a further reasonable alternative to be explored, namely providing the Overton Mill allocation together with one or more other sites in Overton. Finally, it assesses the likely significant effects of the Overton Mill allocation on the basis of a 340-home development, not the updated and unjustified 400 homes figure in the draft policy. There has therefore been no assessment under the SEA Regs of the actual proposed allocation.

45. Turning to the Habitats Regs, the HRA Report (like the Environmental Report) identifies and assesses the 340-home allocation as one which “could significantly impact the nutrient levels in the River Test, affecting Solent European sites”. Para. 6.4 of the HRA Report notes that the LP was the subject of an HRA which concluded that “the proposed growth in Overton would not cause likely significant effects”, and asserts that the ONP “adheres to the housing allocations and policies within the Local Plan” (i.e. the plan adopted in 2016), and. As set out above, this is plainly false. The strategic housing policies of the LP are out-of-date, and the ONP goes further than the LP in allocating new sites for development. Therefore, even on the assumption of a 340-home allocation, the conclusion of the HRA Report is materially flawed. That flaw is then exacerbated by the fact that the assessed figure of 340 homes is itself out-of-date due to the draft allocation now being for 400 homes.
46. In respect of basic condition (d), we have reviewed the report by i-Transport submitted on behalf of the Bargate. This report presents significant highway safety, capacity and accessibility concerns, which present a compelling case for why it would not be rational to conclude that the ONP, by allocating this site at Overton Mill, would not be contributing to sustainability development.
47. In our view, a readily available solution presents itself to these legal deficiencies in the ONP: an additional allocation for Bargate’s site, namely Land South West of Overton, Sapley Lane (whether in addition to Overton Mill or in addition to

other sites without Overton Mill). Officers at the Council have recently conducted a thorough assessment of the outline planning application for 130 homes and recommended approval. This recommendation was not taken up by members, who voted to refuse planning permission on 24 September 2025. We are instructed that Bargate are currently preparing an appeal.

48. We finally add that, if the ONP were to be made as it currently stands, we would question whether it can properly be said to “contain policies and allocations to meet its identified housing requirement” for the purposes of NPPF para. 14(b). That is primarily because there is wholly insufficient evidence that policy H2 is deliverable, for the reasons given above. We would add that, even if (which is not the case) the Overton Mill site could deliver 400 homes (the number could be materially lower), that would still result in a shortfall against the minimum figure of 410, and there is no credible evidence to suggest that “windfall” sites in Overton can make up the difference.

Conclusion

49. For the reasons given above, we do not see how an examiner could rationally exercise their planning judgment to conclude that the “basic conditions” in paras. 8(2)(a), (d) and (f) of Sch. 4B to the 1990 Act have been met by the ONP. That is because:
- (1) Having regard to national policy on the importance of deliverability and significantly boosting the housing supply, it cannot be “appropriate” to rest the totality of Overton’s housing contribution on a single brownfield site with significant concerns over viability and deliverability, with no recognition of the recent major uplift in the indicative housing requirement.
 - (2) The Environmental Report (required by the SEA Regs) fails to conduct a legally adequate assessment of reasonable alternatives, and the HRA Report is based on a flawed assumption that the ONP “adheres to the housing allocations and policies within the [LP]”. Both reports are also out-of-date

because they only subject the former 340-home draft allocation to assessment.

- (3) The report by i-Transport on behalf of Bargate identifies significant highway safety, capacity and accessibility concerns that undermine the sustainability of the proposed allocation in policy H2 of the ONP.
50. We have nothing to add as presently instructed, but would be happy to advise further if required.

SASHA WHITE K.C.

MATTHEW FRASER

Landmark Chambers

[REDACTED]
[REDACTED]

16 October 2025



Decision Maker: Cllr Konieczko, Cabinet Member for Strategic Planning and Infrastructure

Date: September 2025

Subject: Overton Neighbourhood Development Plan 2025-2040: Submission Consultation

Report of: Joanne Brombley – Planning Policy Manager

Contact Officer: Victoria Corrigan – Senior Planning Policy Officer
Email – [REDACTED]
Tel – [REDACTED]

Ward(s): Overton, Whitchurch and Laverstoke

Key Decision: No

Appendix 1: Proposed Response from the LPA to the Submission Overton Neighbourhood Plan

Appendix 2: Map of Overton designated Neighbourhood Planning Area

Appendix 3: Submission Overton Neighbourhood Development Plan (2025 – 2040)

Appendix 4: Overton Modification Statement

Exempt or Confidential Information

It is considered that information contained within this report (and appendices) does not contain exempt information under the meaning of Schedule 12A of the Local Government Act 1972, as amended, and therefore can be made public.

Recommendation to the Cabinet Member

- Agrees that the comments on the draft Overton Neighbourhood Development Plan (as set out in Appendix 1) should be submitted in response to the submission (Regulation 16) consultation.

Background, corporate objectives and priorities

The Localism Act (2011) introduced a mechanism for local communities to produce Neighbourhood Plans (NP), enabling them to have a greater say in the future of their areas. A total of 15 neighbourhood plans have now been made in the borough and these form part of the Development Plan and are used in the determination of relevant planning applications in their areas.

The considerations outlined in this report support delivery of the Council Plan (2023-27) priorities - a place where people can live happily and a borough where the environment can flourish.

Glossary of terms

Term	Definition
ONP	Overton Neighbourhood Plan
ALP	Adopted Basingstoke and Deane Local Plan (2011-2029)
BDBC	Basingstoke and Deane Borough Council
EQIA	Equalities Impact Assessment
LPA	Local Planning Authority
MHCLG	Ministry of Housing, Communities and Local Government
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
ONDP	Overton Neighbourhood Development Plan 2025-2040

Main considerations

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to set out the council's response to the submission consultation on the updated Overton Neighbourhood Plan (the Overton Neighbourhood Development Plan 2025-2040, ONDP). The Plan is currently subject to a formal period of public consultation as per Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.2 The Localism Act 2011 introduced a mechanism for local communities to produce neighbourhood plans. Once a neighbourhood plan is 'made' it becomes part of the statutory development plan for that area and will be used, alongside local and national planning policy and guidance, to determine planning applications.

2 Details

- 2.1 Overton Parish has an existing neighbourhood plan that was made (adopted) by the council in July 2016. The Parish Council is in the process of updating this plan.

What is the process for updating a neighbourhood plan?

- 2.2 The production of a neighbourhood plan must follow a regulatory process and the Town and Country Planning Act 1990 as amended (by the Localism Act 2011) and Neighbourhood Planning (General) Regulations 2012 set out the

key stages in the preparation of such plans and the process for them becoming part of the development plan.

- 2.3 Parish councils are able to update their neighbourhood plans whenever they wish. However, the process for updating the neighbourhood plan depends upon the extent of changes proposed.
- 2.4 Minor (non-material) updates that would not materially affect policies may be made by the LPA with consent from the neighbourhood planning group. In these circumstances there is no need to undertake consultation and neither an examination nor a referendum is required. However, if the updates would have a material impact upon the Plan, it is necessary to follow a process similar to producing a new neighbourhood plan.
- 2.5 The LPA and Overton Parish Council consider that the proposed changes would have a material impact upon the Plan and therefore the following process is being followed (with the current stage shown in bold):
- a) Designation of a neighbourhood area - The area covered by the neighbourhood plan needs to be agreed by the borough council.
 - b) Preparation of a draft neighbourhood plan - The 'qualifying body', then prepares the draft neighbourhood plan and evidence base.
 - c) Pre-submission publicity and consultation - The Plan is submitted for Pre-submission publicity and consultation for a minimum of 6 weeks.
 - d) Submission of the draft plan - The 'qualifying body' formally submits the neighbourhood plan to the local planning authority (LPA). The LPA checks whether the plan accords with the relevant legislation, publicises the plan for at least 6 weeks and appoints an Independent Examiner.**
 - e) Examination - The neighbourhood plan is examined by an Independent Examiner to assess whether it meets the basic conditions. The Examiner then issues a report, if the report is positive and the borough council agrees with it, the plan is then subject to referendum.
- 2.6 The examiner's report will consider whether the proposed modifications would 'change the nature of the plan' and therefore whether there should be a referendum. The guidance indicates that a referendum would be required if it 'involved allocating significant new sites for development'.
- 2.7 Although it is ultimately the examiner's decision, the qualifying body and the LPA are required to indicate whether they consider the changes proposed are so significant and substantial as to require a referendum. In this case, both the Parish Council and the LPA consider that the changes proposed do change the nature of the plan, in particular due to the major site allocation at Portals Mill. This is explained further in the council's Modification Statement, which will be sent to the examiner (Appendix 4).
- 2.8 If the examiner agrees that a referendum is required, the council will organise a referendum. If the referendum is positive, the neighbourhood plan becomes

part of the development plan at that point. It will then also need to be formally 'made' (adopted) by the council.

Progress to date

- 2.9 The area covered by the ONDP was formally designated for the purpose of neighbourhood planning, under section 61G of the Town and Country Planning Act (1990) in 2013. The designation corresponds with the existing parish boundary and a map showing the designated area is attached as Appendix 2 to this report.
- 2.10 In line with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended), the pre-submission or draft version of the ONDP was subject to public consultation between 1 February and 16 March 2025. The submission version (Appendix 3) has been submitted under Regulation 15 of the above regulations and includes the plan itself (with appendices), a consultation statement, a basic conditions statement, Strategic Environmental Assessment/Habitats Regulations Assessment reports, a modification proposal statement, policy map booklet and an equalities impact assessment. The plan is also supported by other background papers.
- 2.11 The LPA has provided support and guidance in relation to the production of the ONDP as it has developed. The LPA fully supports the initiative of Overton Parish Council (OPC) to update their Neighbourhood Plan and recognises that it has required a lot of work and extensive community involvement. The submission version of the plan has been checked to ensure that it complies with relevant legislation, and on 26 August 2025 the LPA confirmed to the parish council that it met the statutory requirements. The ONDP was subsequently published for formal public consultation on Thursday 4 September, and this will run up to Thursday 16 October 2025 (6 weeks). The LPA is a statutory consultee in the process. The LPA's comments on the submission plan will be forwarded to the independent examiner, who will be appointed by the LPA (with the approval of the parish council) to examine the plan.
- 2.12 There is no legal requirement for officers' comments made at the pre-submission or submission stage of the NP process to be agreed by the Portfolio Holder, Cabinet or Council. However, this report has been written in the interests of transparency, and engaging with, and keeping, members informed.

3 Key issues for consideration

Contents of the Plan

- 3.1 The neighbourhood plan includes the following key policies:
- A new site allocation for approximately 400 dwellings at Portals Mill;
 - An amended settlement policy boundary (SPB) for Overton. The boundary includes sites that have been built out since the boundary was last reviewed, but excludes (and so effectively deallocates) two existing neighbourhood plan site allocations at Land East of Court Drove (14

dwellings) and Land North West of Overton Primary School (11 dwellings). The parish council has concluded that it would be more sustainable to meet its local housing need on the brownfield site at Portals Mill than on these greenfield sites;

- A policy to control the type of development that will be permitted in residential gardens;
- A policy on housing mix, seeking the provision of smaller homes;
- An Overton Design Guide and Codes (Appendix A to the Plan) to ensure high quality design;
- A policy supporting highly sustainable new development;
- New policies that seek to protect biodiversity and protect and enhance the existing green and blue infrastructure network within the parish;
- Policies to enhance active travel opportunities, including the protection of existing public rights of way; and
- A policy to protect and enhance the historic village centre whilst supporting a thriving business centre.

3.2 The LPA provided comments on the ONDP at the pre-submission stage in March 2025. Subsequently an amended Plan has been produced which addresses most of the comments raised. This is very much welcomed by the LPA.

3.3 At the submission stage, there is no requirement for the LPA to consider whether the draft plan meets the Basic Conditions. That assessment will take place after the examination into the plan has been completed and once the independent examiner's report has been received. However, the LPA has been mindful of the Basic Conditions (set by the Localism Act 2011 and incorporated in the Town and Country Planning Act 1990 as amended), which are set out below, when considering the Plan. The Basic Conditions require that neighbourhood plans:

- Must have regard to national policy and advice;
- Must contribute to the achievement of sustainable development;
- Must be in general conformity with the strategic policies contained in the Local Plan;
- Must not breach, and be otherwise compatible with EU and Human Rights Obligations; and
- Must meet prescribed conditions.

Key Issues

3.4 Officers have reviewed the submission ONDP in the context of earlier comments made by the LPA, available national policy and guidance on neighbourhood planning, the relevant regulations, and experience gained from the progress of other plans across the borough and nationally. Appendix 1 sets out the LPA's proposed detailed comments on the submission version of the Plan. A commentary on some of the key issues follows.

New site allocation at Portals Mill

- 3.5 The submission neighbourhood plan proposes to allocate a site for approximately 400 dwellings at Land at Portals Mill (Policy H2) on the edge of Overton. The site was previously proposed to be allocated in the council's Regulation 18 draft Local Plan in 2024 (Policy SPS5.10 Overton Mill), and the inclusion of this site allocation in the neighbourhood plan is strongly supported.
- 3.6 However, the LPA has some concerns about whether the identified capacity of 400 dwellings can be satisfactorily accommodated within the site given the increase in yield from the LPA's Regulation 18 draft Local Plan site allocation in 2024 which proposed a capacity of approximately 340 dwellings (as did the earlier, pre-submission ONDP). Justification for this increase in yield is needed to ensure that any development would be in keeping with the established character of Overton.
- What is the parish's 'identified housing requirement'?
- 3.7 The LPA's previous Local Plan evidence base (the Settlement Study, 2024) identified that, at that time, Overton's indicative housing requirement was 250 dwellings. This figure informed the drafting of Policy SPS6 (Neighbourhood Planning) in the 2024 Regulation 18 Local Plan.
- 3.8 However, since then, the council has published, in draft form, a revised spatial strategy setting out proposals for how the borough would meet an increased housing requirement set by the 2024 NPPF. This was discussed at Economy and Infrastructure Committee in September 2025 and was supported by an updated draft Settlement Study which identified and evidenced housing requirements for the rural settlements. This identified an increased housing requirement of 410 dwellings for Overton.
- 3.9 Although the spatial strategy has not yet been considered by Cabinet, prior to proposed statutory consultation (Regulation 18) later in the year, it is considered that this provides the most up-to-date indication of the council's planning strategy and should therefore inform the parish's 'identified housing requirement'.
- Would the Plan provide protection from speculative development?
- 3.10 The LPA considers that the site allocation (in combination with NP Policy H1, which supports windfall development within the SPB) would ensure the plan 'contains policies and allocations to meet its identified housing requirement' (as required by NPPF para 14b). Subject to the views of the examiner on this matter, the Plan would therefore provide the parish with five years' protection from speculative development.

Other issues

- 3.11 A limited number of other issues have been identified which the LPA considers need to be addressed. These include:
- Concerns about the proposed all-purpose vehicular access into the Portals Mill site from Kingsclere Road (B3051) (Policy H2). This is likely to have an unacceptable impact upon the National Landscape and highway and does not appear to be supported by any landscape or transport evidence. The LPA considers that this access should only be used for emergency use (as proposed by the draft Regulation 18 Local Plan, in 2024), and that the policy and the concept plan should be updated accordingly.
 - Concern about the proposed water efficiency standard for Portals Mill (Policy H2). Whilst this is a laudable aim, it is noted that the requirement goes beyond that permitted by national guidance.
 - Concern that Policy H6 (Net Zero Carbon Buildings) requires development to be 'zero carbon ready' (rather than encouraging it, as proposed at Regulation 14). This would be contrary to the Written Ministerial Statement (2023), and this change would be inconsistent with examiners' reports for other neighbourhood plans in the borough.
 - A suggestion that Policy ATP2 (Car Parking) should be amended to ensure there is no conflict with the adopted BDBC parking standards.
 - A range of other updates to other policies to ensure they can be clearly understood by the decision-maker.
- 3.12 The comments also identify a few minor issues that the examiner may choose to address through modifications to the Plan.

4 Options Analysis

- 4.1 The LPA could decide not to respond to the consultation. However, this would mean the council's representations concerning the NP would not be considered by the independent examiner when they assess the NP against the Basic Conditions.

5 Timetable

- 5.1 The submission consultation on the ONP opened on the 4 September 2025 and will run for six weeks, closing on the 16 October 2025. The decision is therefore due within this time period to ensure that the consultation response can be submitted in time.

Corporate implications

6 Legal

- 6.1 Under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 the LPA must carry out submission consultation and publicity in relation to its proposed neighbourhood plan. The Council is a statutory consultee in

that consultation and therefore may wish to submit a consultation response in relation to the ONDP before the NP is considered by the independent examiner as part of the examination process so that the Council's comments will be considered by the examiner when assessing the ONP.

7 Financial

- 7.1 MHCLG pays LPAs £20,000 per plan, where they meet the relevant criteria. The payment is made on successful completion of the neighbourhood planning examination and the setting of a referendum date (if required) This funding will cover the costs of the examination and other further steps needed for the neighbourhood plan to come into legal force, including referendum. The referendum will incur appropriate costs in line with the council's duties and procedures.

8 Property and regeneration

- 8.1 There are no property or regeneration implications arising from this report.

9 Risk management

- 9.1 A risk assessment has been completed in accordance with the council's risk management process and has identified no significant (Red or Amber) residual risks that cannot be fully minimised by existing or planned controls or additional procedures.

10 Equality, Diversity and Inclusion

- 10.1 The council must have due regard to Section 149 of the Equality Act 2010 when making any decision. This duty requires the council in making decisions to have due regard to the need to—
- 10.2 (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- 10.3 (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- 10.4 (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 10.5 An Equality Impact Assessment has been undertaken by the Parish Council (as part of the submission documents) to consider the impact of the submission neighbourhood plan on the protected characteristics groups and the implications for the Public Sector Equality Duty. This assessment concluded that the plan would generally be neutral or positive for a range of protected characteristic groups. No adverse impacts have been identified.

11 Consultation, engagement and communication

- 11.1 In accordance with the regulations, the council is responsible for running the Regulation 16 consultation. Consultation on the submission Plan is taking place between Thursday 4 September and Thursday 16 October 2025.

- 11.2 Consultation has included direct communication to statutory consultees and respondents who commented at the pre submission stage. The consultation documents have been made available to view on the council's website and consultation portal. Printed paper copies are available to inspect at the council offices, Basingstoke Discovery Centre, Overton Library, Whitchurch Library and at a number of locations in Overton, as agreed with the parish council, including Overton Parish Council Office and The Red Lion Pub. A public notice has also been placed in the Basingstoke Gazette (4 September) and Andover Advertiser (5 September) newspapers.
- 11.3 On receipt of the Independent Examiner's report, providing it is positive and agrees that the Plan meets the Basic Conditions, and the LPA agrees, and that a referendum is required, then the council will organise a local referendum on the Plan.
- 11.4 Subject to a positive vote at a referendum (more than 50% of the votes cast are in favour of the neighbourhood plan) and provided the ONDP is compatible with any EU or human rights obligations, the plan will be 'made' by the council.
- 11.5 Any referendum and the result would be communicated by the council through its website, digital channels including social media and the local media.

12 Climate change, ecological and biodiversity

- 12.1 The submission plan includes a policy on net zero carbon buildings (Policy H6), which seeks to minimise the amount of energy needed to heat and cool buildings through design, layout, building orientation, massing and landscaping, as well as looking to reduce embodied carbon and encouraging PassivHaus standards (or equivalent) where achievable. This policy would help to mitigate and adapt to climate change. The Plan includes other Policies including LEB3 (River Test SSSI, Nutrient Neutrality and Wastewater), LEB4 (Biodiversity, Geodiversity and Nature Conservation) and LEB5 (Green and Blue Infrastructure), which will help the parish adapt to the effects of climate change. Policy ATP1 (Active Travel) also aims to make provision for EV charging points.
- 12.2 The submission plan contains several policies that seek to protect and enhance biodiversity within the parish, a theme which is also clearly reflected in the Plan's vision. Policy LEB4 also refers to and aligns with mandatory biodiversity net gain and the forthcoming Hampshire Local Nature Recovery Strategy.

13 HR

- 13.1 There are no HR issues as a result of this report.

Conclusion

14 Summary and reason for the decision

14.1 In conclusion, it is recommended that the LPA's proposed comments (as outlined in appendix 1) are submitted to the Independent Examiner for their consideration when assessing the ONDP against the Basic Conditions. The Plan is generally supported, although it is acknowledged that the LPA's comments on the submission Plan raise a limited number of issues for the examiner to consider in light of the national and local planning framework.

15 Background Papers

- BDBC Neighbourhood Planning Protocol - Updated May 2024
- Localism Act 2011
- The Neighbourhood Planning (General) Regulations 2012
- Neighbourhood Planning Act 2017

Date: September 2025

Decision taken by: Portfolio Holder for Strategic Planning and Infrastructure

25 September 2025

Overton Neighbourhood Plan Review – Modification Statement

Dear Ms Cheesley,

Under section 17 (e) (ii) of The Neighbourhood Planning (General) Regulations 2012 (as amended), the Local Planning Authority (LPA) is required to submit a statement setting out whether or not it considers the proposed modifications to be so significant or substantial they would change the nature of the plan. The LPA is also required to give reasons why this conclusion has been reached.

The existing Overton Neighbourhood Plan was ‘made’ in July 2016 and the decision to review the plan was taken in October 2021. Since the plan was adopted there have been legislative changes such as the Environment Act 2021, as well as the declaration of climate and ecological emergencies by the borough council.

The modified Overton Neighbourhood Plan includes entirely new policies and in some cases, new topic areas such as Net Zero Carbon Buildings and Nutrient Neutrality. The policies within the submission plan are:

Housing and New Development Policies

- Policy H1: Overton Settlement Policy Boundary and Building in the Countryside
- Policy H2: Land at Portals Mill
- Policy H3: Residential Garden Land Development
- Policy H4: Housing Mix and Provision of Smaller Homes
- Policy H5: The Overton Design Guidance and Codes
- Policy H6: Net Zero Carbon Buildings

Chief Executive Russell O’Keefe
Deputy Chief Executive Rebecca Emmett

Director of Resident Services Fiona Darby
Director of Regeneration Sarah Longthorpe
Executive Director of Corporate Services and Assets (Section 151 Officer) Sue Cuerden CPFA ACMA

Landscape, Environment and Biodiversity Policies

- Policy LEB1: Local Landscape
- Policy LEB2: Important Views
- Policy LEB3: River Test SSSI, Nutrient Neutrality and Wastewater
- Policy LEB4: Biodiversity, Geodiversity and Nature Conservation
- Policy LEB5: Green and Blue Infrastructure
- Policy LEB6: Public Rights of Way (PRoW)

Access, Transport and Parking Policies

- Policy ATP1: Active Travel
- Policy ATP2: Car Parking

Village Centre and Business Policies

- Policy VB1: Supporting Overton as a Thriving Business Centre
- Policy VB2: Protecting the Historic Village Centre for Retail and Hospitality

Community Facilities

- Policy CF1: Supporting and Maintaining Valued Community Facilities outside the Historic Village Centre

A summary of the key changes arising from the new policies are listed below:

- An amended settlement policy boundary (SPB) for Overton. The new boundary includes the new draft site allocation at Portals Mill (for approximately 400 dwellings) and the other neighbourhood plan sites that have been built out since the boundary was last reviewed;
- A policy to control the type of development that will be permitted in residential gardens;
- An Overton Design Guide and Codes (Appendix A to the Plan) to ensure high quality design;
- A policy supporting highly sustainable new development;
- New policies that seek to protect biodiversity and protect and enhance the existing green and blue infrastructure network within the parish;
- A policy to protect the historic village centre whilst supporting a thriving business centre.

The Planning Practice Guidance (PPG) sets out 3 types of modification that can apply when a neighbourhood plan is reviewed. These are:

- Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.

- Material modifications which do not change the nature of the plan or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.
- Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

The LPA is of the view that the proposals would materially affect the policies in the plan that would therefore change the nature of the plan. The main reasons for this are:

This is because the new draft Plan includes:

1. A new draft site allocation (Portals Mill) for approximately 400 dwellings, which partly sits within the North Wessex Downs National Landscape. The Neighbourhood Plan Area, including the new site allocation, is also within the River Test catchment where there is a requirement for development to achieve nutrient neutrality;
2. The removal of 2 site allocations (land east of Court Drove and land northwest of Overton Primary School) from the 'made' Overton Neighbourhood Plan (2016);
3. New planning policies, some of which cover new policy topic areas;
4. New Design Guidance and Codes.

It is therefore considered that the modifications proposed do expand upon the existing policy framework and would be so significant or substantial as to change the nature of the plan. Therefore, in summary, the LPA considers that the neighbourhood plan should be subject to an independent examination and referendum.

Yours sincerely

Victoria Corrigan
Senior Planning Policy Officer

Victoria Corrigan

From: Victoria Corrigan
Sent: 15 October 2025 11:12
To: Local Plan
Cc: Jessica Wells
Subject: LPA response to Overton Reg 16 Consultation
Attachments: LPA Reg 16 Response.pdf

To the Local Plan Inbox

Please find attached the council's response to the Overton Regulation 16 consultation.

Kind regards

Victoria

Victoria Corrigan
Senior Planning Policy Officer
Basingstoke and Deane Borough Council



Appendix 1: Response from the LPA to the Overton Neighbourhood Plan (Regulation 16)

Detailed Assessment of the Overton Neighbourhood Development Plan (2025-2040) and Supporting Documentation

These comments provide a detailed assessment of the Overton Neighbourhood Plan (OVNP) in relation to the ‘basic conditions’ requirements. This includes an assessment of how the Plan would operate in practice once it is ‘made’, as it is important to ensure that the OV NP can be implemented in a manner which delivers on the objectives of the document. Annex A to this response sets out some additional minor/factual observations.

In most cases, the objective and intent of the draft policies is supported, but the suggestions are aimed at ensuring that the policies achieve the objective for which they are intended. Rather than review each policy in detail, the comments only address those policies where the LPA has identified specific issues which it considers need to be addressed.

Section/ Policy	BDBC comments in response to policy	Potential options/ actions	Regulation 16 Plan Comment
Draft Modification Proposal Statement (January 2025)	<p>During the Regulation 14 consultation, the Local Planning Authority agreed that the proposed modifications would be material and would change the nature of the Plan.</p> <p>This is because the new draft Plan includes:</p> <ul style="list-style-type: none"> a) A new site allocation (Overton Mill) for approximately 340 dwellings which partly sits within the North Wessex Downs National Landscape. The Neighbourhood Plan Area, including part of the new site allocation, is also within the River Test catchment where there is a requirement for development to achieve nutrient neutrality; b) The removal of 2 site allocations (land east of Court Drove and land north west of Overton Primary School) from the ‘made’ Overton Neighbourhood Plan (2016); c) New planning policies covering new policy areas; d) New Design Guidance and Codes. 		The LPA remains of the view that the proposed modifications would be material and would change the nature of the Plan in line with points a) to d).

Document title	The Plan period should be to 2040 (not 2044) to align with the Reg 18 draft Local Plan, which sets Overton's indicative housing requirement.	Update the Plan period as suggested.	Partially met. The Plan period date has been amended to 2025-2040. The new Local Plan period is currently 2024 – 2042 (in line with the evidence that informs it and the parish's indicative housing requirement), so it is suggested that the plan period should be changed to align with this.
Figure 1 (About Overton)	Suggest Figure 1 (map of the civil parish of Overton) identifies all villages and hamlets referred to elsewhere in the Plan (for example, in Policy LEB1).	Update Figure 1 as suggested.	Met. Figure 1 has been updated as suggested.
Table 1 (pg. 11)	The fourth box in Table 1 (Basic Conditions) refers to the Neighbourhood Plan being compatible with EU obligations. This should be corrected to include reference to it being compatible with human rights requirements.	Amend text to refer to human rights requirements.	Met. The wording in the fourth box of Table 1 now refers to Human Rights requirements.
Section 2	The 'About Overton' section could be enhanced with mapping (for example the National Landscape and its heritage and ecological designations). These would provide a helpful reference for later sections of the plan.		Not Met. However, it is recognised that this is not necessary to satisfy the basic conditions.
The Vision (pg. 15)	Suggest the Vision is redrafted to provide an aspirational statement of what the community wants for the future of Overton, rather than referring to what has happened in the past. Paragraph 37 has more of the language normally associated with a vision. The vision should also be more positively worded, where possible. For example, "the sense of community has not been diminished" could be rephrased to read "Overton retains its strong sense of community".	Amend the text as suggested.	Partially Met. Paragraph 35 has been amended as suggested. However, it would be clearer if paragraphs 36 and 37 were also changed to be clear that these related to what the parish would look like in the future.

Paragraph 24	Paragraph requires clarification. It is assumed that it is referring to para 11 d) i) of the NPPF which identifies the need to protect areas or assets of particular importance including the National Landscape.	Review paragraph	Met. The paragraph (now paragraph 25) has been updated as suggested (although includes an erroneous 2, before 11d).
Section 3.3	This section should include reference to the Local Plan. Although it is referred to elsewhere in the chapter, for decision-making purposes it has greater status than the other documents listed here.		Met. Paragraph 21 now refers to the Adopted Local Plan. However, it is not correct to say that this has precedence in planning decisions. It might also be helpful for the reader if an additional paragraph was included to explain the emerging Local Plan and its significance.
Objectives	<p>It may be easier to have fewer, more high-level objectives, and to leave some of the detail to the policies. For example, objective 1 describes what the policy is going to do, rather than being an objective of the plan itself. I would suggest that an objective should be to meet the village's future housing needs.</p> <p>In the event that all 21 objectives are to be retained, it would be helpful if the objectives were grouped thematically i.e. housing; landscape, environment and biodiversity etc.</p> <p>It is also suggested that if objective 2 is retained, it should be amended to also refer to the 'River Test compensatory Special Area of Conservation (SAC) habitat', as recently notified by Natural England.</p>	Suggest reviewing and updating the objectives.	<p>Partially Met.</p> <p>The objectives have now been grouped thematically which is more user friendly. However, the objectives themselves have not been amended to provide fewer, more high-level objectives, as previously suggested.</p> <p>The list does not include an objective to meet the village's future housing needs (as previously suggested), however it is noted that objective 2 (now objective 14) has been updated to refer to the SAC as suggested.</p>
Policies	It is suggested that the Plan could include a statement that the Neighbourhood Plan should be read alongside the policies in the Local Plan, and that proposals will be judged against all relevant policies.		Met. A statement has been added to cover this point (Section 5.2).

Policies	Paragraph numbers (which follow on from the rest of the text) should not be used in policies.		Met.
Policy H1 Overton Settlement Boundary	Policy title (and subsequent references) should refer to 'Settlement <u>Policy</u> Boundary', to be consistent with the adopted Local Plan.	Amend text as suggested to maintain consistency.	Met. Amended as suggested.
Policy H1 Overton Settlement Boundary	A proposals map should be provided as an appendix to the plan showing all the proposed designations. This should show the old and new SPBs alongside each other to clearly show how the boundary has changed.		Partially Met. A proposals map (titled Policy Map Booklet) has been provided alongside the Neighbourhood Plan, setting out the proposed designations within the Parish. However, the plan does not show how the settlement policy boundary is proposed to change (comparing the current and the proposed boundaries).
Policy H1 Overton Settlement Boundary	The update to Overton's settlement policy boundary (SPB) is supported in principle. However, the LPA has concerns about the SPB around the Portals Mill site. The LPA is concerned that the SPB in Figure 3 includes too much land, and it also does not align with the boundary shown in Figure 4. It is noted that paragraph 42 omits reference to the inclusion of Sovereign Gate. It is also noted that the revised SPB does not propose to include the two allocations from the current NP at Land East of Court Drove and Land North West of Overton Primary School (which were allocated by the current NP). These are therefore effectively de-allocated by this Plan. The LPA	Amend text to refer to all proposed modifications to the SPB, including the development at Sovereign Gate. Update Figure 3 to accurately show the proposed SPB.	Met. It is noted that an evidence base document 'Discussion of the exclusion of Court Drove Sites' has been submitted with the Plan, to explain why these have been excluded from the SPB. Figure 3 has been updated and now shows the proposed SPB drawn more closely around the Portals Mill site. This aligns with the boundary shown on the Concept Plan at Figure 4. Paragraph 42 (now paragraph 43) has been updated to include reference to the

	notes that this has been justified in the document titled 'Consideration of the case for exclusion of land east of Court Drove and land north west of Overton Primary School'.		development at Sovereign Gate, as previously suggested. It is also noted that the SPB in the SE corner of the village (adjacent to Two Gate Lane) has been changed (from that proposed at Reg 14) to follow the boundary of the built-up area. This is supported.
Policy H1 Overton Settlement Boundary	The reference to Overton Design Code in the policy should refer to the document by its full name, and ideally also reference which appendix it is in.	Amend text to aid clarity.	Met. The document title has been amended, as suggested. Reference has also been made to the relevant Appendix (Appendix A).
Policy H2 Land at Portals Mill	<u>Meeting Overton's identified needs</u> The inclusion of a site allocation to meet identified needs is strongly supported in principle. The proposed site allocation for Overton is the same site that was put forward as a draft site allocation in the council's Regulation 18 Local Plan consultation (Policy SPS5.10: Overton Mill) for the provision of approximately 340 homes. The selection of the site is explained and supported by the submitted SEA. Based upon information available at the current time, the LPA considers this is likely to meet the parish's local housing need (as required by NPPF para 70). However, it is recommended that further evidence is provided to demonstrate that the draft site allocation can satisfactorily accommodate the number of dwellings proposed.	Further evidence should be provided to satisfactorily demonstrate that the site can deliver the number of dwellings currently proposed (approximately 340 dwellings).	Not Met. The LPA has concerns about the suggested increased capacity of the site from approximately 340 dwellings (at Reg 14) to approximately 400 dwellings. Justification for this increase in yield is needed to ensure that any development would be in keeping with the established character of Overton. <u>Indicative housing requirement</u> In terms of the parish's indicative housing requirement, the LPA wrote to the Parish Council on 3 July 2025 setting out that, at that time, it considered that its requirement was 250 dwellings (Submission Plan, Appendix B). This was based upon the Settlement Study (2024, as published alongside the Regulation

		<p>18 Local Plan consultation) and data about additional housing commitments that had taken place since that time.</p> <p>Since this correspondence, the LPA has made public a proposed new growth strategy setting out draft proposals for delivering the increased housing requirement in the 2024 NPPF. The draft new planning policies were discussed at Economic and Infrastructure Committee on 4 September 2025, and the draft plan is due to be considered at Cabinet on 11 November with a recommendation that Regulation 18 consultation should be undertaken in November 2025-January 2026.</p> <p>The approach to the rural settlements (such as Overton) is explained in the committee papers and an updated draft Settlement Study, which is an appendix to that report.</p> <p>These documents propose new housing requirements for the rural settlements, taking into account the settlements' share of the new, increased standard method housing requirement as their starting point. This has resulted in an indicative housing requirement of 410 dwellings for Overton.</p> <p>The LPA considers that the plan provides 'policies and allocations to meet its identified housing requirement', as required by NPPF para 14. The plan (Policy H1) provides a</p>
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		<p>positive framework for development within the SPB over the 15 year plan period, which would supplement the housing expected at Portals Mill, to meet the indicative housing requirement set out above.</p> <p>It is suggested that Appendix B (Indicative Housing Requirement) is removed from the Plan as this has been superseded (as explained above).</p>
<p>Policy H2 Land at Portals Mill</p>	<p><u>New vehicular access from Kingsclere Road</u> The LPA has concerns about the proposed vehicular access from Kingsclere Road (to the west of the site). This is likely to be unacceptable in both landscape and highway terms and is not supported by evidence.</p> <ul style="list-style-type: none"> To the west of the site, the approach to Overton sits within the North Wessex Downs National Landscape which is of national significance in terms of its landscape sensitivity. The existing approach is intact, the B3051 approaching along a simple line bordered by field margin hedgerows, largely uninterrupted. Any proposal for a main vehicular entrance and exit into the site on to the B3051 at this point is likely to be unacceptable in landscape terms due to adverse landscape impacts it is likely to give rise to. Impacts that could be generated relate to the rising nature of the land, the road alignment and location of the railway bridge in close proximity, which would give rise to the need for a significant visibility splay and loss of structural vegetation which contributes to the character and amenity of this part of the National Landscape. Additional surfacing and road markings, 	<p>Not Met.</p> <p>The LPA raised concerns about the proposed vehicular access from Kingsclere Road for numerous reasons, including the fact that the Regulation 14 ONDP was not supported by any landscape or transport evidence to demonstrate the acceptability and deliverability of a new all-purpose vehicular access to the west.</p> <p>The submitted ONDP Consultation Statement (pg. 65) states that ‘HCC have suggested that the viability of the access from Kingsclere Road requires investigation, and the policy has been updated accordingly’.</p> <p>Policy H2 (criterion xxi) continues to refer to the provision of a new access from Kingsclere Road (B3051) but this still does not appear to be supported by any landscape or transport evidence. Instead, an additional sentence has been added to criterion xxi) of the policy</p>

	<p>signage, lighting and entrance features would result in an urbanisation of what is currently a relatively quiet and consistent approach into the north west of Overton.</p> <ul style="list-style-type: none">• In the event that the development was to provide all-purpose accesses from both Papermill Lane and Kingsclere Road (instead of an emergency access only from the latter), there is a risk of encouraging rat running through the development by traffic seeking to avoid the existing congestion and delays within the village centre (including at the cross roads), especially by those accessing Overton Railway Station, the local businesses etc.• Furthermore, it appears that this section of Kingsclere Road does not currently provide any dedicated facilities for pedestrians and cyclists. It would appear that looks providing such facilities would be challenging, for example given the possible presence of third-party land to the south (inc. the land associated with the Gas Governors) as well as the constrained nature of the existing bridge over the railway (inc. that the form and height of the existing parapets may not accord with modern design standards) and the absence of connecting dedicated pedestrian and cycle facilities upon the southern side of this bridge.• The ONP is not supported by any landscape or transport evidence to demonstrate the deliverability of a new vehicular access from Kingsclere Road or any evidence about the potential wider impacts this may		<p>stating that the access points (Papermill Lane and Kingsclere Road) 'will be contingent on assessment by the highways authority for suitability and safety'.</p> <p>It is considered that this issue should be resolved at the plan-making stage and that criterion xxi and the concept plan should be updated to remove the all-modes access from the B3051. It could nonetheless be retained as an emergency access.</p>
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	<p>have on the character of the National Landscape and the surrounding transport network.</p>		
<p>Policy H2 Land at Portals Mill</p>	<p><u>Open Space outside the SPB</u> Areas of land are shown within the site allocation boundary, but outside of the settlement policy boundary, on areas of agricultural land which relate positively to the North Wessex Downs National Landscape (this relates to the open areas of land to the east and west of the northern site parcel - see the site allocation plan – Figure 4).</p> <p>In landscape terms, these are highly sensitive to development and it is unclear what might be proposed for them. In order to inform what might be acceptable, it is advised that the policy includes wording to limit any uses on these areas of the site to those of an informal nature. Open space provision should be designed to be laid out as accessible natural green space for recreational use only, in order to provide a suitable transition from the wider National Landscape into the site.</p> <p>It is suggested that the following wording is added under criterion vii of the policy:</p> <p><u>“Ensure there is a suitable transition between the areas of agricultural land to the east and west of the northern site parcel (within the site allocation boundary but outside of the settlement policy boundary) and the landscape character of the North Wessex Downs National Landscape. These areas of land should be retained for accessible natural greenspace to be used for recreational purposes only. The use of any sustainable drainage systems (SuDS) within these open areas must be well integrated with the incorporation of</u></p>		<p>Met.</p> <p>The suggested wording has been incorporated into Policy H2 under criterion vii) b) to restrict the uses on the land outside the SPB.</p>

	<u>appropriate landscaping</u> ".		
Policy H2 Land at Portals Mill	<p><u>Gypsy and Traveller provision</u> The NP's site allocation does not make provision for Gypsy and Traveller pitches (as required by Regulation 18 Local Plan Policy SPS5.10).</p> <p>At this time the LPA does not have published position that reflects latest guidance, nor a strategy for meeting its needs. It is therefore considered that it would not be reasonable for the site allocation policy to require pitches to be provided on the site.</p> <p>The LPA will consider Gypsy and Traveller provision comprehensively as part of the Local Plan Update, taking into account updated information about needs and a full understanding of all the opportunities available to meet them. It is therefore suggested that wording should be included in the supporting text to signpost that the LPA could consider provision on this site as part of the LPU's strategy. It is strongly recommended that the following wording is incorporated into the supporting text for Policy H2:</p> <p><u>"The LPA is developing a comprehensive strategy to meet the needs of Gypsy and Travellers as part of its Local Plan Update. It is therefore possible that the Local Plan Update could identify a requirement for pitches on this site"</u>.</p>	Add supporting text	Met. The suggested wording has been incorporated into the supporting text of Policy H2 under paragraph 64.
Policy H2 Land at Portals Mill	<p><u>Biodiversity</u> Suggest making the following updates in relation to biodiversity. Criterion x) should be amended to read:</p>		Met. All of the biodiversity related suggestions made by the LPA have been incorporated into

<p>“Protect and enhance key species and habitats, prevent detrimental impacts and, where unavoidable, mitigate the impact on protected species and habitats, and secure the creation and management of linkages that provide high levels of habitat connectivity within the site and to the wider green infrastructure network <u>the ecological network by ensuring adverse impacts on key species and habitats are avoided, adequately mitigated, or compensated as a last resort, avoiding the loss or deterioration of irreplaceable habitat, and securing the creation and management of green open spaces and linkages that provide high levels of habitat connectivity within the site and to the wider green infrastructure network and the forthcoming Hampshire Local Nature Recovery Strategy</u>”. The following sentence starting with “This will include(SINC)” can remain.</p> <p>The sentence relating to BNG starting “The development will provide a minimum....” should be amended and form a new separate criterion, as follows:</p> <p>“The development will provide <u>achieve</u> a minimum 10% biodiversity net gain together with a site management plan with onsite and offsite habitat enhancements secured as appropriate under a Biodiversity Gain Plan in line with the statutory framework for BNG”.</p> <p>Amend criterion xii) to read:</p> <p>“Demonstrate, via a nutrient neutrality mitigation strategy, through the submission of nutrient budget(s) and supporting nutrient budget, that nutrient neutrality can be achieved in perpetuity in order to protect the Solent nature conservation sites to avoid significant adverse effects on the integrity of the</p>		<p>the policy and supporting text.</p>
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	<p>Solent designated sites from increased wastewater from the development. This should be via on-site...off-site mitigation would be required”.</p> <p>Paragraph 53: “The site is located within the SSSI <u>impact</u> risk zone”.</p> <p>Paragraph 53: After reference to dormice i.e. “...including dormice”, the last sentence should be updated to read: “<u>Any designated sites will need to be protected and enhanced and any proposals should.....of the local landscape</u>”.</p> <p>Paragraph 54: Suggest amending the second and third sentences to make clearer that thorough ecological surveys will be required to assess impacts on all key habitats and species (currently could be misinterpreted to mean just hare, skylark and grassland), with proposals to be supported by suitable avoidance/mitigation strategies to address identified impacts. Development should seek to ensure all existing features of value to wildlife should be retained, protected and enhanced, including suitable buffer zones and species enhancement features.</p> <p>Paragraph 54: The last sentence refers to providing all BNG onsite – this should be prioritised but it may not be possible (and it is not something we can force) so BNG plans should ensure they are compliant with the statutory framework including the Biodiversity Gain Hierarchy as well as the mitigation hierarchy set out within the NPPF. Significant onsite and offsite BNG should be secured and delivered for a minimum period of 30 years.</p> <p>Paragraph 55: The policy should refer to ‘nitrogen neutrality’</p>		
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	rather than nitrate neutrality (as the issue regards the impact of total nitrogen, not just a component of it).		
Policy H2 Land at Portals Mill	<p><u>External Lighting</u> Given the site allocation is partly located within the North Wessex Downs National Landscape, it is considered that a new criterion should be added under the new criterion referred to above (in relation to the open space outside the SPB) to ensure that external lighting is sensitively incorporated into any development. Suggest using wording: <u>“Ensure that where external lighting is proposed, it will be sensitively designed to prevent light pollution that would adversely impact on the surrounding National Landscape and biodiversity”.</u></p>		<p>Partially Met.</p> <p>The suggested wording on external lighting has been added to the supporting text (paragraph 63) instead of the policy. To give this greater weight, it is recommended that this wording is moved to the policy.</p>
Policy H2 Land at Portals Mill	<p><u>Trees</u> For criterion viii) it is suggested that the words ‘where appropriate’ are included in the first sentence i.e. “Retain existing trees <u>where appropriate</u> and.....”. It is also considered necessary to refer to the planting of native species to ensure that any additional planting sits sensitively within the landscape and to help with mitigating and adapting to the effects of climate change. Suggest using the following wording: “...in keeping with the landscape character of the area <u>using suitable native species”.</u></p>		<p>Met.</p> <p>The suggested wording has been incorporated into Policy H2 (criterion viii).</p>
Policy H2 Land at Portals Mill	<p><u>Transport</u> Criterion v. should be updated as follows: “Demonstrate that safe, suitable and.....services, <u>including into Overton village centre,</u> can be.....transport services”.</p> <p>Criterion xix) should include reference to <u>“and enhancing the rural tranquility”</u> of the PRow.</p>		<p>Met.</p> <p>All of the transport related suggestions made by the LPA have been incorporated into the policy and supporting text.</p>

	<p>New supporting text (end of para 58), as follows:</p> <p><u>“The development is also encouraged to provide improvements to Station Approach, to enable its adoption by Hampshire County Council. This would ensure that this route would be designed to fulfil its role as an important route to the train station and to be maintained in the long-term”.</u></p>		
<p>Policy H2 Land at Portals Mill</p>	<p><u>Heritage</u> The council’s Historic Environment Team consider that a number of existing buildings on the site, dating from the 1920s, do have some heritage significance, and should be treated as non-designated heritage assets. Given the history of the site (manufacturing of banknotes and papermaking), it is also considered that at least some of the new dwellings should draw inspiration from the industrial nature and character of the site, in terms of their form, design and architectural features. It is suggested adding a new criterion to the policy under existing criterion viii) to focus on the retention of buildings of historic value. Suggest inserting the following wording:</p> <p><u>“Encourage the retention of buildings of historic value within the site. The layout and appearance of selected parts of the development are encouraged to integrate with these historic buildings to reflect the industrial nature and character of the site”.</u></p> <p>It is suggested that the supporting text (after para 51) should be updated as follows:</p> <p><u>“There are several existing buildings on the site, including the</u></p>		<p>Met.</p> <p>All of the heritage related suggestions made by the LPA have been incorporated into the policy and supporting text.</p>

	<p><u>main Mill building (the ‘Rag House’), which date back to the 1920s. These buildings retain their intended character and appearance as industrial buildings for papermaking and, as such, have historic value. Where possible, these buildings should be retained to ensure that the industrial character of the site, including the importance of the site to the history and development of Overton, is preserved. Consideration should be given to how the layout and appearance of selected parts of the development may integrate with these historic buildings”.</u></p> <p>Paragraph 52 of the supporting text should be updated as follows:</p> <p>“It will <u>also</u> be important to ensure that there are no unjustified adverse impacts on the setting of neighbouring any heritage assets including Overton Conservation Area and a number of listed buildings including Quidhampton Farmhouse. The impact on any potentially affected heritage asset in the area will need to be <u>appropriately assessed, along with</u> considered including two scheduled Monuments to the north of the site, and Laverstoke Park Historic Park and Garden to the south west. These impacts, and any potential mitigation measures, will need to be considered in within a Heritage Statement”.</p>		
<p>Policy H2 Land at Portals Mill</p>	<p><u>Hydrogeological Risk Assessment:</u> During the Local Plan Reg 18 consultation (Jan 2024) the Environment Agency advised that the site is located on a principal aquifer and that the site includes a historic landfill, which would require further investigation. As such, a detailed hydrogeological assessment would be essential in respect of sensitive receptors (River Test SSSI), contaminated land and</p>		<p>Met.</p> <p>The policy wording has been updated as suggested (criterion xi).</p>

	<p>groundwater quality. It is suggested that the following text is incorporated into the policy after criterion x):</p> <p><u>“Ensure the protection of groundwater and sensitive receptors (including the River Test SSSI) given the site’s location on a principal aquifer. This can be achieved by undertaking a Hydrogeological Risk Assessment to inform development design, infiltration features and any necessary mitigation. This should include assessment of contamination migration risks from the historic landfill”.</u></p>		
<p>Policy H2 Land at Portals Mill</p>	<p><u>Construction Environmental Management Plan (CEMP):</u> During the Local Plan Reg 18 consultation (Jan 2024) Natural England advised that any application should be supported by a CEMP to avoid impacts from all potential sources of pollution from impacting on the River Test SSSI. The following wording should be incorporated into the policy text after the new wording on the hydrogeological assessment:</p> <p><u>“Demonstrate, via a Construction Environmental Management Plan (CEMP), that all potential sources of pollution from the development on the SSSI and the adjoining SINC can be mitigated. The sustainable use of construction, demolition and excavation waste should be maximised in line with the adopted Hampshire Minerals and Waste Plan”.</u></p> <p>Furthermore, criterion xi) (wording on flood risk management measures) could include the following wording:</p> <p><u>“This must include consideration of the drainage of surface water, including outfalls”.</u></p>		<p>Met.</p> <p>The LPAs suggestions have been incorporated within the policy wording.</p>

<p>Policy H2 Land at Portals Mill</p>	<p><u>Noise:</u> Criterion xiii) should be strengthened to ensure that any proposed development takes the scheme design and layout into consideration. It is suggested this criterion is amended to read as follows:</p> <p>“Ensure that noise impacts arising from the railway and any employment use on the site are successfully mitigated through suitable measures <u>Ensure that the scheme design and layout demonstrably respond to noise impacts arising from the railway, any traffic within the site vicinity and the proposed retail/employment uses, in order to optimise noise mitigation by good acoustic design”.</u></p> <p>The supporting text should read as follows:</p> <p>“The land parcels to the north and south are divided by a railway line. and Any noise pollution affecting new homes and amenity spaces will need to be mitigated as a result of the railway, proposed retail/employment uses or traffic generation within close proximity to the site, affecting new homes and amenity spaces will need to be satisfactorily mitigated through design and layout that follows the principles of good acoustic design. A detailed noise assessment....may be required. Attenuation treatment to dwellings should be viewed as a last resort, as set out within the council’s Guidance note for developers and consultants on noise assessments”. (This document could be added to the list of references at the end of the Plan).</p>		<p>Met.</p> <p>The policy wording and supporting text have been updated as suggested.</p>
<p>Policy H2 Land at Portals Mill</p>	<p><u>Sewerage infrastructure:</u> During the Reg 18 consultation on the Local Plan policy Southern Water suggested some additional wording.</p>		<p>Partially Met.</p> <p>The suggested policy wording has been</p>

	<p>Suggest adding the following wording at the end of criterion xx):</p> <p><u>“... This must include phasing the occupation of development to ensure it aligns with the delivery of sewerage infrastructure, in consultation with the service provider and ensuring the layout of the development allows for future access to existing sewerage infrastructure across the site for maintenance and upsizing purposes”.</u></p> <p>Where any of the above suggested amendments are made to the policy wording, any relevant supporting text will also need to be updated. The council can discuss this with the Neighbourhood Planning Group in due course.</p>		<p>incorporated within criteria xxiv) and xxv).</p> <p>It is noted that criterion xxvi) is a new point in relation to protecting water quality. It is considered that this point is already covered by criterion xv), which requires the completion of a technical investigation and assessment of all sources of flooding and the provision of on-site sustainable drainage systems (SuDS). It is therefore recommended that this wording is moved to the supporting text instead.</p> <p>Additionally, criterion xxvii) is a new point that refers to new development meeting a water efficiency standard of 100 litres or less per person per day, or any future national standard, whichever is lower. Although the LPA is supportive of water-efficient development, this criterion would not be in accordance with the PPG on Housing: Optional Technical Standards. This does not permit plans to set requirements of less than 110l/p/day (which is the standard set by the current Local Plan). Although the neighbourhood plan is only required to ‘have regard’ to national policies and advice, the plan is not supported by evidence about needs or viability to exceptionally justify the proposed standard.</p>
Policy H3 Residential Garden	It would be helpful if the supporting text provided greater clarity about which types of development this policy would be applied to.	Amend text as suggested to aid clarity.	Met. The supporting text (paragraph 65) has been

Land Development			<p>updated to state that Policy H3 is applicable to both domestic and commercial development proposals.</p> <p>It would assist the decision-maker, if the supporting text could clarify whether the policy applied to extensions as well as new structures/buildings.</p>
Policy H3 Residential Garden Land Development	<p>Suggested minor amendments to policy:</p> <p>Introduction:</p> <ul style="list-style-type: none"> • The text “where planning permission is required,…” (paragraph 61) is not necessary. Planning policies will only apply to those developments that require planning permission. • Paragraph 61 – should be ‘settlement <u>policy</u> boundary’ not ‘settlement boundary’. • Include reference to the relevant appendix for the Overton Design Guidance and Codes. • Consider replacing ‘should’ with ‘must’. <p>Criterion (i):</p> <ul style="list-style-type: none"> • Reword criterion to maintain or enhance ‘the established character and layout of the surrounding area within which the proposed development is located’. <p>It is suggested that the policy could also include the following additional requirements:</p> <ul style="list-style-type: none"> • Require that any development also maintains the prevailing character and amenity of residential gardens 	Amend the text as suggested.	<p>Met.</p> <p>All of the policy wording has been updated as suggested.</p>

	<p>including their overall size, proportions, sense of space and amenity;</p> <ul style="list-style-type: none"> Require the retention of trees, structural vegetation and green infrastructure which contribute to local character and visual amenity. 		
Policy H4 Housing Mix and Provision of Smaller Homes	<p>Criteria (i) and (ii) should only apply to market housing. This would align with the approach in ALP Policy CN3 and prevent the situation occurring where all the small units are affordable (and the market housing is all large).</p> <p>Criterion (ii) could be strengthened by saying 'must' rather than 'should'.</p>	Update policy as suggested.	<p>Not Met.</p> <p>Although the revised wording has tried to address this comment, it is suggested that criteria (i) and (ii) require further clarification.</p> <p>The wording of the policy should specifically refer to what the mix of market housing should be.</p> <p>'Proposals for market housing' above a certain size will be required to also include affordable housing – and, as written, it is possible that the policy could still allow the smaller units to be provided by the affordable component.</p>
Policy H5 Overton Design Code	<p>Paragraphs 68 & 69 refer to the code distinguishing between a number of different character areas. The code doesn't actually identify character areas and, instead, sets out principles but with local examples to aid the interpretation of the principles.</p> <p>This approach (without a clear identification of the character areas) is fine as the Code can still be used to assess how a scheme relates to the character of the area and whether it is in accordance with principles of good design. But it would be clearer if these paragraphs did not refer to character areas in the Code given that they are not found there.</p>	Amend text to ensure consistency with the Overton Design Guidance and Codes.	<p>Met.</p> <p>The wording in the supporting text has been updated as suggested.</p>

Policy H5 Overton Design Code	Paragraph 69 could also include a cross-reference to the Landscape, Biodiversity and Trees SPD.	Update text to refer to the Landscape, Biodiversity and Trees SPD.	Not Met. It would be helpful for the reader if paragraph 69 (now paragraph 71) made reference to the Landscape, Biodiversity and Trees SPD as well as the Design and Sustainability SPD.
Policy H6 Net Zero Carbon Buildings	To further encourage such development, it is suggested that the policy could include a positive statement that <u>“in considering planning applications, positive weight will be given to development proposals that incorporate a building design that is certified to a PassivHaus or equivalent standard”</u> .	Amend text as suggested to ensure that the policy requirement is more likely to be achieved.	Met. The suggested policy wording has been included.
Policy H6 Net Zero Carbon Buildings	If the policy is referring to terms such as ‘zero carbon ready’, ‘embodied carbon’ and ‘PassivHaus’, these definitions should be explained within the supporting text.	Amend the text to provide an explanation of the terms used within the policy in the supporting text so there is no ambiguity over what the policy is asking for.	Partly Met. The relevant definitions have been provided within the supporting text. It is noted, however, that the policy has been changed from encouraging the ‘zero carbon ready’ standard (at Reg 14) to now requiring it. Although the LPA supports highly sustainable new development, there are concerns that the policy would set a building performance standard that would be contrary to the Written Ministerial Statement (2023) without a clear rationale or viability information. If it is to be a requirement, further information would need to be provided to explain what the ‘zero carbon ready’ standard means in

			practice, and what would be expected with the planning application to demonstrate that it would be met.
Policy LEB1 Local Landscape	<p>It is considered that the policy and its supporting text should put greater emphasis upon the importance of the National Landscape (not just in the context of the character of the villages as set out in para 73 (i)). The following wording is suggested:</p> <p><u>“Designation of the North Wessex Downs National Landscape reflects the national importance of that landscape and its setting. Development proposals in the National Landscape or its setting will also be determined in accordance with national planning policy and criteria set out in the North Wessex Downs Management Plan and associated documents, such as position statements. This includes maintenance and enhancement of the tranquillity and distinctive landscape character of the North Wessex Downs”.</u></p> <p>Where there are references to dark skies in the policy, this should include reference to the North Wessex Downs National Landscape Position Statement on Dark Night Skies & Artificial Light (Feb 2021).</p>		<p>Met.</p> <p>The suggested wording has been incorporated into the policy.</p> <p>Reference has also been made to the North Wessex Downs National Landscape Position Statement on Dark Night Skies & Artificial Light (Feb 2021).</p>
Policy LEB1 Local Landscape	<p>The terminology ‘development proposals within and around Overton’ is not sufficiently precise.</p> <p>Suggest strengthening the policy wording as follows:</p> <p>i) “How they have...visual connectivity <u>relationship of...Ashe Warren and Ashe) in to the wider...</u>”.</p> <p>ii) “That they...of the Parish <u>and North Wessex Downs</u></p>	Provide additional explanation and a map as suggested.	<p>Met.</p> <p>The policy wording has been updated as suggested.</p>

	<u>National Landscape, and limit...</u>		
Policy LEB1 Local Landscape	It is not clear how the Landscape Character Areas (described in paragraph 78) relate to the policy, which should be explained (and could also be mapped). Also, there should be some explanation of how these Character Areas relate to what the Design Code says about the landscape.	Clarify how the Landscape Character Areas relate to the policy and Design Code. Include a map of these areas.	Partially Met. The supporting text helpfully includes some explanation of the four main character areas and how these relate to the policy. However, the terminology relating to landscape character has been mixed with visual amenity. It is suggested that new paragraph 82 is reworded as follows: <u>“This policy seeks to ensure that all development proposals have understood and responded to the special landscape character of the Parish, and its contribution to the overall character of Overton. The policy does not seek to impose a blanket restriction on development around or inside the settlement but requires demonstration that proposals will not harm its landscape characteristics”.</u> It is also suggested that similar wording is included in (new) criterion (ii) as it is not stated what is being protected in the landscape areas. It would also be helpful if the policy referenced the map showing these areas. It is also suggested that an additional section is added to the policy requiring development proposals to be sympathetic to the visual amenity and street scene within the landscape

			<p>setting and context in and around Overton.</p> <p>As previously advised by the LPA, there should be some cross-reference to how these character areas relate to what the Design Code says about the landscape.</p>
<p>Policy LEB2 River Test SSSI, Nutrient Neutrality & Wastewater</p> <p>(Now Policy LEB3)</p>	<p>Suggest rewording policy paragraph 82 as follows:</p> <p><u>“The River Test SSSI and downstream stretches of the River Test compensatory Special Area of Conservation (SAC) habitat must be protected from all-negative any significant impacts...businesses are occupied”.</u></p> <p>To justify this, a new paragraph should be inserted into the supporting text regarding compensatory SAC:</p> <p><u>“Some stretches of the River Test and some of its headwaters have been identified by Natural England as compensatory Special Area of Conservation (SAC) habitat. Development within the parish of Overton must ensure any potential impacts from construction and/or operational phases are properly assessed and avoided or mitigated where necessary”.</u></p> <p>Paragraph 83 (in the policy) should make clear that the requirement for nutrient neutrality only applies to residential development or development resulting in overnight accommodation. The text should be amended as follows:</p> <p><u>“All new dwellings....net increase in wastewater production and population due to a net gain in overnight accommodation served by a wastewater system that could...latest Natural</u></p>	<p>Suggest amending policy wording and supporting text be in accordance with Natural England’s current position on nutrient neutrality.</p>	<p>Met (now Policy LEB3).</p> <p>The policy wording and supporting text have been updated as suggested.</p>

	<p>England guidance”.</p> <p>The supporting text should clearly set out that overnight accommodation can include student accommodation, and tourist attractions and accommodation.</p>		
<p>Policy LEB3 Important Views</p> <p>(Now Policy LEB2)</p>	<p>Suggest that more views of the Church and North Field are shown in Figure 6 (for example from the high ground along the B3400 near the junction with Overton Hill).</p>	<p>Provide additional views as suggested.</p>	<p>Met (Now Policy LEB2).</p> <p>Additional views have been included within Figure 7 and Table 3 of the Submission Plan as suggested.</p>
<p>Policy LEB3 Important Views</p>	<p>All of these Important Views merit their own number and title so they can be more easily referred to (pages 34-36). They should not be combined into one type of view (such as Important View 4 – views to the south) as this weakens their status. It is suggested that a separate appendix is provided to explain the importance of each view, ideally including photographs to illustrate the reason for each designation.</p>	<p>Amend as suggested.</p>	<p>Met.</p> <p>The views have been individually identified and given a number/title.</p> <p>A new Appendix has been created (Appendix C), which includes photographs of each of the individual views. Notwithstanding this, a number of the photographs within Appendix C: Important Views are blurred. It is advised that these are reviewed and higher quality images used where required.</p>
<p>Policy LEB4 Biodiversity, Geodiversity & Nature Conservation</p>	<p>The LPA and the council’s Biodiversity team would be happy to support you with the redrafting of this policy in order to provide the strongest possible policy framework.</p> <p>It is recommended that the policy criteria relating to biodiversity are amended and reorganised so that the protection and enhancement of biodiversity is prioritised with the following hierarchy:</p>	<p>Amend and reorganise the policy as suggested so that the protection and enhancement</p>	<p>Partially Met.</p> <p>The Reg 14 policy has been split into two policies:</p> <ul style="list-style-type: none"> - Policy LEB4: Biodiversity, Geodiversity and Nature Conservation; and - Policy LEB5: Green and Blue

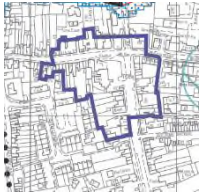
	<ol style="list-style-type: none"> 1. Protection of existing national and local designated sites (SPAs, SACs, SSSIs, SINCs and LNRs); 2. No loss or deterioration of any priority habitat type, including irreplaceable habitat; 3. No adverse impact on the conservation status of any protected or notable species; 4. Protection and enhancement of the wider ecological network e.g. via provision of accessible natural greenspace, buffers and wildlife corridors; 5. Achievement of 10% BNG for a minimum of 30 years (unless development is exempt); 6. Integration of species enhancement features. <p>It is suggested that the policy and supporting text are broken up with sub-headings relating to these points to make it easier for the reader to understand.</p> <p>In relation to point 4 (above), the policy could refer to restoring, creating and reconnecting habitat within the wider ecological network in line with the council's Spatial Priorities (as identified within the Biodiversity Strategy (2024)), ecological network mapping (as identified within the council's Landscape, Biodiversity and Trees SPD) and/or the forthcoming Hampshire Local Nature Recovery Strategy (LNRS).</p> <p>The supporting text could set out intentions to align with and help deliver objectives/land management projects and initiatives set out within the forthcoming Hampshire Local Nature Recovery Strategy (LNRS) once published (para 108).</p> <p>In relation to Biodiversity Net Gain (point 5):</p>	<p>of biodiversity is prioritised at the top.</p>	<p>Infrastructure.</p> <p>These comments relate to Policy LEB4 in the Submission Plan.</p> <p>The policy is now considered to include some strong and clear requirements for the protection and conservation of biodiversity.</p> <p>Notwithstanding this, it is considered that a number of points still need to be addressed as per the LPA's previous comments.</p> <p>Given the extent of changes that have been made to the policy, to avoid confusion, these comments go through the outstanding issues in the order they are presented in the submission plan.</p> <ul style="list-style-type: none"> • The policy should include a criterion referring to species enhancement features (see point 6 from BDBC's previous comments). Measures designed to protect and increase local populations are currently referred to under para b) of the supporting text, but not within the policy itself. • It is unclear why the supporting text has paras a)-d) (rather than numbered), and whether this (and the way they are written) is intended to infer any different
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	<ul style="list-style-type: none"> • Suggest rewording criterion x. in relation to BNG to reflect mandatory requirements. This should come before criterion vi. which details BNG delivery. Suggest using wording such as: “<u>Development proposals, unless classed and demonstrated as exempt, must achieve a minimum 10% biodiversity net gain to be delivered over a period of at least 30 years in accordance with statutory requirements and guidance</u>”. • The interim BNG Guidance (criterion x) for development (2021) is no longer available, which was removed once BNG became mandatory at the start of the year. Reference to this should be omitted. The council is currently working on new BNG Guidance, which could be referred to in the supporting text. • Suggest amending the wording for criterion vi. to remain in accordance with the BNG statutory hierarchy, which requires developers to prioritise habitat compensation as close to the area of impact as possible by following a hierarchy of onsite provision, then offsite, or where neither are demonstrated to be possible, to purchase government statutory credits that will deliver habitat elsewhere. Although the LPA would strongly encourage the provision of offsite BNG within the borough if this cannot be achieved onsite, statutory credits would allow BNG provision elsewhere in the country. <p>In relation to species enhancement features (point 6, above), it is noted that the policy refers to swifts and hedgehogs. This should refer to providing biodiversity enhancement features for all ‘priority or threatened species’, including bats (NPPF para 187d).</p>		<p>status.</p> <ul style="list-style-type: none"> • ST para (a): ‘Local ecological network’ should be defined, in addition to clarifying what is meant by ‘site boundary’. Presumably this is referring to development sites (also see point 4 regarding the wider ecological network in the LPAs previous comments). • ST para b) refers to swifts, hedgehogs and bats only. This should refer to providing biodiversity enhancement features for all ‘priority’ or threatened species (ref. NPPF para 187d); • ST para 98: The last sentence of paragraph 98 should refer to the ‘Hampshire and Isle of Wight Nature Partnership’; • ST para 99: Should be updated to refer to The Environment Act 2021, rather than NERC. The duty to ‘have regard’ has now been strengthened requiring public authorities to enhance, as well as conserve biodiversity. This should also be updated. • The supporting text should require that development proposals are accompanied by up-to-date ecological assessments carried out in line with best practice (see the final bullet point
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	<p>There are some more general comments about the supporting text, below:</p> <ul style="list-style-type: none"> • Paragraph 107 should be updated to refer to the Environment Act 2021 rather than NERC. The duty to ‘have regard’ has now been strengthened requiring public authorities to enhance, as well as conserve to biodiversity, as well as reporting on it regularly. • Supporting text should require that development proposals are accompanied by up-to-date ecological assessments (where required) carried out in line with best practice, to assess impacts on biodiversity. Suitable avoidance, mitigation and compensation strategies should also be provided to address any identified impacts. 		<p>in the LPA’s previous comments).</p>
<p>Policy LEB4 Biodiversity, Geodiversity & Nature Conservation</p>	<p>The focus upon Green Infrastructure is welcomed within the policy. However, Green Infrastructure is not reflected in the policy title and it is suggested that there could be a separate policy on Green infrastructure covering criteria i) and ii). Within this policy:</p> <ul style="list-style-type: none"> • It is suggested that rather than making a general reference to Natural England’s Green Infrastructure Framework (GIF), the policy should identify the specific principles it wishes to incorporate (criterion (i)). • Suggest swapping “the highest possible level of green/blue infrastructure..” for wording such as “<u>where relevant, the design and layout of development proposals should maximise the provision of green and blue infrastructure...</u>”. (criterion (ii)) 		<p>Partially Met.</p> <p>Reg 14 Policy LEB4 has been split into two policies, and these comments relate to Submission Policy LEB5: Green and Blue Infrastructure.</p> <p>In relation to Policy LEB5, it is noted that the wording of the new policy closely follows Policy ENV7 of the draft Regulation 18 Local Plan that was consulted on in early 2024.</p> <p>It is considered that the policy would benefit from being more locally distinctive, in line with previous comments. This would include:</p> <ul style="list-style-type: none"> • Identifying the specific principles of the Natural England Green Infrastructure

			<p>Framework that would be relevant to the parish of Overton.</p> <ul style="list-style-type: none"> Using criterion ii) from the pre-submission (Reg 14) Plan could be incorporated into the policy, taking into account the suggested changes to the wording for this particular criterion.
<p>Policy LEB5 Public Rights of Way (PRoW)</p> <p>(Now Policy LEB6)</p>	<p>Consider combining points ii) and iii) of the policy where there is some duplication i.e. new developments installing new rights of way or permissive paths are referred to in both criteria.</p>	<p>Amend policy text to avoid duplication.</p>	<p>Not Met.</p> <p>However, it is recognised that this is not necessary to satisfy the basic conditions.</p>
<p>Policy LEB5 Public Rights of Way (PRoW)</p> <p>(Now Policy LEB6)</p>	<p>Suggest ensuring that policy criterion i) refers to protecting and enhancing the users' quiet enjoyment of the countryside from the right of way network through minimising impacts on character and visual amenity.</p>	<p>Amend text as suggested to include reference to protecting and enhancing the tranquillity of the right of way network.</p>	<p>Met.</p> <p>The suggested wording has been included within criterion viii). However, the word 'quite' should instead say 'quiet'.</p>
<p>Policy ATP1 Active Travel</p>	<p>Remove the wording "within the settlement" from the first line of the policy (paragraph 115) (and consequential change to (ii)) as these principles would be applicable to all development.</p>	<p>Amend text as suggested.</p>	<p>Met.</p> <p>The suggested updates have been made to the policy wording.</p>
<p>Policy ATP1 Active Travel</p>	<p>Consider defining 'active travel' in the supporting text, given this does not appear to be defined within the adopted BDBC Local Plan (2011 to 2029). Suggest adding something like:</p>	<p>Amend text as suggested for clarity.</p>	<p>Met.</p> <p>A definition of 'active travel' has been provided</p>

	“making journeys by physically active means such as walking or cycling”.		within the supporting text (paragraph 112).
Policy ATP1 Active Travel	Criterion ii) of the policy appears to duplicate criterion i) with regards to active travel. Suggest revisiting these criteria and amalgamating where possible.	Consider amalgamating criterion i) and ii) of the policy.	Met. The policy wording has been amalgamated as suggested.
Policy ATP1 Active Travel	Consider whether criterion iii) is necessary given that public rights of way and permissive paths are already covered under Policy LEB5.		Met. Criterion iii) has been removed from the submission plan to avoid duplication with Policy LEB6.
Policy ATP1 Active Travel	Suggest criteria iv) relating to EV fast charging facilities would sit better under Policy ATP2. Additionally, infrastructure for the charging of electric vehicles will fall under the Building Regulations (Part S). Suggest revising criterion to state. “EV charging points shall be provided in accordance with relevant standards in safe, accessible and convenient locations”.	Consider moving criterion iv) to Policy ATP2 and re-wording.	Partially Met. Criterion iv) (now criterion iii) has been reworded as suggested. As previously suggested, it is recommended that this criterion is relocated to sit under Policy ATP2.
Policy ATP2 Car Parking	Given that the previous policy (ATP1) supports the increased uptake of cycling, Policy ATP2 could be expanded to also require the provision of secure and conveniently sited cycle parking facilities.	Suggest updating the policy wording to align more closely with Objective 7.	Met. The policy wording has been updated as suggested. The policy title should also be changed to reflect the inclusion of cycle parking.
Policy ATP2 Car Parking	Paragraph 118 does not align with the adopted BDBC parking standards SPD (2018) which requires that parking should be provided in accordance with the specified standards, whilst taking into account local circumstances. There is no evidence to justify that alternative parking standards should apply in Overton.	Amend text to ensure that the policy requirements would not conflict with	Not Met. New wording has been included in paragraph 113 which states that parking provision in excess of the LPA’s adopted standards would be welcomed. However, this conflicts with

		the adopted BDBC parking standards.	Local Plan Policy EM10 2.e) and the Parking Standards SPD, which states that the SPD's figures should be viewed as the expected standard, so should be deleted.
Policies VB1 and VB2	<p>The policies are linked to a new 'Overton Village Centre' boundary which is considerably larger than the District Centre Boundary identified in the adopted Local Plan. It is not clear whether this designation is intended to supersede the boundary in the LP, as there is some overlap in their scope. This needs to be made clear to enable the decision maker to know how to react to development proposals.</p> <p>Local Plan Policy EP3 identifies Overton as a District Centre in the retail hierarchy with the following boundary:</p>  <p>Within this area, Policy EP3 states that main town centre uses (including retail, office, entertainment and leisure) are supported, and any development that would harm of vitality and viability of the defined centre will not be permitted. Outside this area, retail and other main town centre uses are usually only permitted where they would meet the sequential and impact tests, as set out in the NPPF.</p> <p>Policy VB1 supports the development of some types of main town centre uses across the 'Village Centre' area – which is larger than the area in which such uses are permitted by ALP</p>	<p>Clarify relationship between NP's Village Centre boundary and LP District Centre boundary (and Policy EP3).</p> <p>The policy could be reframed to focus on the heritage elements that the plan is trying to protect rather supporting specific uses.</p>	<p>Met.</p> <p>The boundary of the Village Centre has been updated in line with the LPA's previous comments and now aligns with the boundary of the District Centre in the adopted Local Plan. Main town centre uses (such as retail) are supported in principle in this area by Local Plan Policy EP3, and the NP policy VB1 sets detailed criteria to assess such applications.</p>

	<p>Policy EP3.</p> <p>It is therefore not clear whether the policy intends to supersede EP3 (and create a much larger District Centre boundary – which would need to be justified), or whether the development that is supported outside EP3’s centre boundary is still subject to the restrictions of Policy EP3 (a sequential test etc would be required).</p>		
Policy VB1	<p>Notwithstanding the in-principle comment (above), there are a number of detailed comments on the policy:</p> <ul style="list-style-type: none"> i. Change ‘in keeping’ with the Conservation Area to reflect LP Policy EM11’s requirement to ‘conserve and enhance’. ii. Criteria (ii) – Expand to cover harm to the heritage significance of the shop front, not just loss. iii. The first part of criterion (iv) does not relate to when new commercial uses would be permitted (as set out in the main part of the policy). It should either be a separate statement at the end of the policy or included in Policy VB2 (as it relates to protecting commercial uses) <p>Para 124, should add caveat about complying with local and national planning policies. Whilst the general support for such uses is understood, it is necessary to ensure they would not undermine the vitality of the viability of the village centre. This is recognised by objective 21.</p>	Consider suggested amendments	<p>Met.</p> <p>The policy wording and supporting text have been updated as suggested.</p> <p>However, given the in-principle support for such uses, it is suggested that the policy could be more positively phrased with the omission of the term ‘only’ in the introduction to Policy VB1.</p>
Policy VB2	<ul style="list-style-type: none"> i. It is unclear what uses are covered by ‘commercial premises’. Does this include offices? Should this only apply to uses on ground floor frontages? 	Consider suggested amendments	<p>Partially Met.</p> <p>It is recognised that the policy has been</p>

	<p>ii. Should (i) and (ii) be 'or' (rather than 'and') as there would be no current business if the building is vacant.</p> <p>iii. Criterion (iii), clarity which types of use it should be marketed for.</p> <p>It would be helpful to explain how the policy would work alongside Policy CN7. As drafted, pubs etc outside the Village Centre boundary would not be protected by this policy.</p>	<p>changed to respond to the previous comments.</p> <p>However, there are still concerns about the inter-relationship between Policies VB1 and VB2. Although the introduction includes a reference to ground floor frontages, it is not clear whether the policy only applies to ground floor uses. If the policy also applies to upper floors, there is a potential conflict with the final paragraph of Policy VB1 which is generally supportive of such changes of use on upper floors.</p> <p>It is inferred that the loss of one of the identified uses would be acceptable if it moved to another one of the identified uses. It would be helpful if this was clearly stated.</p> <p>It is also not entirely clear how the policy would apply to redundant buildings, where the planning use had been abandoned (potentially a long time ago). It is nonetheless understood that the policy is intended to apply to vacant premises for the purpose it was last use for.</p> <p>Unless otherwise explained, the tests in the policy are different to those in Local Plan Policy CN7, and the NP policy would take precedence in accordance with NPPF para 31.</p> <p>It is also noted that the proposed marketing period has been increased from 12 months to</p>
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			<p>24 months. 12 months would be the usual period of time that the LPA would expect premises to be marketed (for example, draft new Local Plan Policy EMP2). Whilst it is recognised that it is important to fully test the market, it would not be desirable to have premises sitting vacant for a long period of time, particularly if this is a requirement of criterion (ii). It is also queried whether the building needs to be vacant for the market to have been fully tested.</p>
<p>Policy CF1: Valued Community Facilities</p>	<p>(new policy)</p>		<p>A new policy has been added to protect valued community facilities outside the village centre. This policy is supported in principle and would help to deliver the vision.</p> <ul style="list-style-type: none"> • The reference to ‘the above facilities’ in the first line of the policy is unclear. It is assumed that it should instead refer to the facilities identified in Figure 10, which are assumed to be the ‘valued community facilities’. • It is unclear whether a ‘valued community facility’ is the same as a ‘local community facility’. It is confusing that in criterion (iv) local community facilities are distinguished from shops and pubs. There is also reference to a ‘local community use’ in criterion (vi). It is suggested that the wording should be

			<p>made more consistent.</p> <ul style="list-style-type: none">• The first paragraph of the policy should be clarified to state 'Proposals to develop.....<u>where</u> they accord with <u>national, local or ...</u>'• There are concerns that not all the policy requirements would be applicable to the areas of open space that have been identified;• In relation to criterion i), it would be helpful to specify how long the premises should be actively marketed for, to avoid later challenges over what constitutes a 'reasonable effort';• For criterion iii), it is questioned whether it is desirable for the building to be vacant for 24 months, and whether marketing could take place while the building was occupied.
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Appendix D Design Guidance & Codes (this is now Appendix A)			
Titles	The relevant title i.e. Appendix D (or relevant reference) should be put on the front page.		Not Met. The title 'Appendix A' should be put on the front page of that document.
General	Each of the guidelines for each code should have its own letter or number (rather than being just a bullet) so that it can be more easily referenced and used in decision making and when commenting on whether a proposed development is in accordance with the code. So, for example, on page 27, the first bullet starting "Development proposals should ensure continuity...." could perhaps be labelled with an (a) so that it could be referred to in due course as Guideline SL01a. This approach should be used for all the principles in the code.		Met.
Page 10	The NPPF reference needs updating to 2024.		Not Met. The NPPF reference in the title needs to be 2024 rather than 2025.
Page 11	The Basingstoke and Deane Emerging Plan would be better referred to as the draft Basingstoke and Deane Local Plan Update.		Met.
Page 31	Houses with garages. The minimum internal garage size should be 7.0m by 3.3m so that it is in accordance with the council's Parking SPD (2018).		Met.
Page 41	Should read 'storeys' not 'stories' (second paragraph).		Met.
Page 44	Third paragraph should start "To ensure adequate outdoor amenity space, back gardens should have a minimum depth of 10 metres and offer a minimum of at least 50 square metres of usable area. This useable area would need to be increased to 60 sqm for houses of 3-bedrooms or larger or if		Met.

	required to enable the new plot to be in keeping with the character of the area.” This will make this reference in accordance with the council’s Design and Sustainability SPD (2018).		
Page 49	For Policy BF09 (Infill Developments), this could result in adverse impacts on the character of the settlement and its setting, where gaps between dwellings form part of a scattered linear character. The use of infill development should therefore only be considered when this is sympathetic to the existing character and visual amenity of the locality.		Not Met.
Page 52	It might help if it was explained what feature of the built environment in Overton related to each of the colours in the colour palette.		Not Met.
Page 29	New LPA comment		Criteria a-d on this page addresses conservation/heritage matters. These criteria presumably need their own code which deals with heritage. Would this be code SL03?
Page 30	New LPA comment		Presumably criteria h should be added on to the end of criteria g.
Page 34	New LPA comment		Presumably criteria n should be m to follow on from the previous pages. Other criteria to be renumbered accordingly.
Page 34	New LPA comment		Criteria p and figure 39. It should say that driveways beside homes must be long enough (at least 5.2 metres and not 5 metres) so that it is in accordance with the council’s Parking SPD (2018).
Page 37	New LPA comment		Presumably criteria a and b should be one criteria and also c and d should be one criteria.
Page 38	New LPA comment		Presumably criteria i, j and k should be one criteria.

Page 39	New LPA comment		Presumably criteria r and s should be one criteria.
Page 40	New LPA comment		Presumably criteria a and b should be one criteria and criteria d, e and f should be one criteria.
Page 45	New LPA comment		Presumably criteria a and b should be one criteria.
Pages 50-52	New LPA comment		There is a lot of text here on architectural appearance, some of which could usefully be divided up into criteria to aid the application of this guidance to development proposals.
Page 63	New LPA comment		Presumably criteria b and c should be one criteria.
Page 64	New LPA comment		Presumably criteria h and i should be one criteria.
Page 65	New LPA comment		Presumably criteria a and b should be one criteria and criteria c and d should be one criteria.

Annex A: Minor Changes suggested

Minor changes suggested to Neighbourhood Plan		
Front page	A publication date would be useful (such as February 2025 for this version and another date for later versions) to help distinguish between different versions of the Plan.	Met.
Contents page	Any relevant appendices need to be listed in this Contents page.	Met.

Preface	Suggest changing the wording in the second paragraph from "...and carries full weight" to "...and will carry full weight".	Met.
Preface	Spelling error on page 6 (currently reads as "Ane" instead of "Anne").	Met.
Paragraph 4 (About Overton)	Paragraph four refers to Overton Railway Station being accessed via an unadopted road. It is suggested that this sentence is amended to read as follows: "Situated uphill and north of the village centre, Overton Railway Station is accessed via existing roads extending from both Kingsclere Road and Station Road. As identified on HCC's website, some sections of these roads extending from the railway station are not maintained at public expense by HCC (as the Local Highway Authority)".	Met.
General	Throughout the document, numbers in brackets are provided such as in paragraph 2 of Chapter 2 (About Overton). For example, this paragraph states "the majority of Overton's listed buildings lie within the Conservation Area [1]". No footnotes are provided and instead the bracketed numbers relate to the references page right at the end of the document (with links provided). It would be helpful for the reader if this was explained early on in the document i.e. that links to particular documents of relevance are provided under Chapter 11, or these were moved into footnotes.	Met.
Section 4.1 (Community engagement)	This section should be updated after Regulation 14 and further detail should be included in the consultation statement that is required to accompany the submission plan.	Partially Met. Additional detail added to the Consultation Statement.
Paragraph 31	The word 'for' is missing from the first sentence. The sentence should read "This draft NDP was made available to local people for 6 weeks.....".	Met.
Policy H1 Overton Settlement Boundary	Suggested that paragraph 41 may be better suited to the supporting text for the site allocation policy at Overton Mill (Policy H2). This paragraph also needs to clarify which consultation event in May 2023 is being referred to.	Partially Met. The paragraph (now paragraph 49) has been added to the supporting text of Policy H2.
Paragraph 38	Delete the word 'of' before "the Overton Design Code." Also refer to Appendix D which is the design code.	Met.
Policy H3 Residential	Suggest rewording each criterion (i-iii) so that each one does not start with 'they'. For example, at the end of paragraph 61 you could include wording such as "Development proposals must:" and	Partially Met.

Garden Land Development	then list the individual criteria i.e. "i. maintain, or where possible.....".	
Policy H3 Residential Garden Land Development	Suggest removing "...as permitted by national planning policy" in paragraph 62, which is not considered to be necessary.	Not Met.
Policy H5 Overton Design Code	There should be a reference to Appendix D within the policy, which comprises this code. The title of Policy H5 should be Overton Design Guidance and Codes, given this is its full title.	Met.
Policy H5 Overton Design Code paragraph 68	Add the word 'the' before 'NPPF' i.e. this sentence should read "...in accordance with the NPPF".	Met.
Paragraph 112 i)	Amend the word 'lies' to 'lie' i.e. "development proposals on land that lie within...".	Not Met.
Policies LEB1 & LEB3	Reorder policies LEB1: Local Landscape and LEB3: Important Views so they are consecutive in the plan as they are inter-linked.	Met.
Policy LEB1 Local Landscape (para 79b)	Are they valued views or important views (consistent terminology)? Valued views are mentioned in 79(b) but not in this policy. Would benefit from a signpost.	This wording (paragraph 79) has now been removed in its entirety.
Policy LEB1 Local Landscape	Supporting text should refer to Policy EM1 in the adopted Local Plan, not draft Policy ENV1 in the LPU (para 80).	Met. Draft Policy ENV1 is no longer referred to.
Policy LEB3 Important Views	Figures 7-10 - the titles of these figures should refer to the fact that they are showing Important Views.	Met. This has now been moved to Appendix C: Important Views.
Policy LEB5 Public Rights of Way (PRoW)	Consider adding to the supporting text that Hampshire County Council (HCC) (as the Local Highway Authority) is responsible for the management of the Public Rights of Way (PRoW) network. See HCC's Rights of Way webpage .	Met.

Policy ATP2: Car Parking	Suggest replacing 'should' with 'must' for paragraph 117: "Development proposals <u>must</u> incorporate...".	The policy wording has been amended to read 'Development proposals will be supported where....'
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Victoria Corrigan

From: MacMitchells <[REDACTED]>
Sent: 15 October 2025 19:29
To: Local Plan
Subject: Overton Neighbourhood Plan - representation

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Dear Sirs

Thank you for the opportunity to comment on the draft Overton Neighbourhood Plan (“ONP”). The ONP is a thorough, well thought through and well-consulted document. It is testament to the nature of Overton that so many people have willingly donated their time, skills and labour to produce it and I hope it is noted for its high quality and thoroughness. It should therefore be taken into account in all planning decisions and given considerable weight pending a referendum and any formal adoption, given the time and the different context that has arisen since the previous plan was adopted.

The overall aim of the ONP is for sustainable development in keeping with the nature of the area, in conformity with all relevant plans and policies. The plan embraces the opportunity afforded by the Portals Mill Site to utilise a brownfield site in a manner that not only benefits Overton, but the wider borough in achievement of its housing stock quotas. The plan has the potential to achieve at pace a truly sustainable development, but with that come with some challenges.

I and many other residents are fully supportive of the aims and objectives of the ONP but we do have some points to ensure the ONP achieves that.

1. Traffic flows in and around the Portals Mill site

A largely or exclusively residential development will have very different traffic impacts and flows compared to the previous use of the site. If 400 housing units are developed, it can be assumed that many of those units will be for families. Movements of traffic in and around the development must be carefully modelled and considered to mitigate the negative impacts on traffic flows around the village, particularly at peak times such as school rush hour. In order to achieve compliance with active travel policies at the local and national level, safe walking and cycling routes to and from the primary school should therefore be identified and implemented. The unadopted road at Station road has no footpath and is full of potholes and pinchpoints and represents an active risk to road users, let alone vulnerable users such as young children on foot. Active Travel Policy I recognises that active travel capacity must be incorporated into the design and not seen as a “bolt on”. It also recognises that new development represents an opportunity to repair and improve missing gaps or pieces in the local area. This accords with national guidance on good design and promoting active travel. The development should therefore include safe walking routes to link the development to most direct routes to the village facilities such as the primary school. This is most easily achieved through linking into the existing pavement infrastructure along Kingsclere Road. Failure to consider active travel and embed this into the design risks exacerbating negative traffic impacts and does not conform with active travel policies.

2. Access

The draft ONP notes the potential for access from the Portals Mill site to Kingsclere Road. This option had overwhelming public support from residents when consulted on it.

It is accepted that this would entail a degree of impact on the SINC. The draft ONP refers to the "largely uninterrupted" field margin hedgerows along the B3501. These are accepted therefore not to be continuous and indeed there are already access points at various locations on the right hand side of the B3501 (e.g. near the bridge).

It is therefore already tacitly understood that a degree of impact on the SINC will be acceptable, either as a temporary access road during construction, or as a means of emergency access throughout the lifetime of the development.

An emergency access route into the development, noting the speeds at which traffic approaches the village, may well need visibility splays to allow safe transport in an emergency situation in and out of the site. It is therefore accepted that in development terms a degree of harm to landscape and visual impacts will already arise.

To mitigate any landscape or transport implications for permanent access from Kingsclere Road, various measures should be adopted:

- a. three way traffic controlled by lights (exiting the development; going north over the bridge; going south over the bridge). This would limit the need for wide visibility splays and ensure the impact on the hedgerows and important landscape views were minimised, and can incorporate safe walking routes as mentioned above;
- b. native hedgerow screening to mitigate visual impacts; traffic lights would remove the need for wide visibility splays and lessen the impact on the SINC's;
- c. incorporation of a pavement route out of the development towards the school, to ensure compliance with the Borough's and national policy aims for active transport by walking and cycling. This would provide a much more direct, and safer route for walking to school, which will encourage uptake and limit the traffic impacts of the development.

I would like to take part in the public examination please.

Thank you

Claire Mitchell

[REDACTED]

[REDACTED]

[REDACTED]

Victoria Corrigan

From: Lippett, Kelly @ London HH <[REDACTED]>
Sent: 16 October 2025 16:33
To: Local Plan
Cc: Tero, Alison @ London HH; Singer, Mark @ London
Subject: Overton Neighbourhood Plan Regulation 16 Representations - Land Investment Projects Ltd
Attachments: ONP Reg 16 Representations obo Land Investment Projects Ltd Final.pdf

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Dear Planning Policy Team,

Please find enclosed representations to the Regulation 16 consultation on the draft Overton Neighbourhood Plan. These representations are submitted on behalf of Land Investment Projects Ltd in relation to their land interests at Overton Mill.

As set out in the representations, we request to participate in an Examination Public Hearing on the Neighbourhood Plan.

I would be grateful if you can confirm receipt of this email and the attached representations.

Kind Regards,

Kelly

Kelly Lippett

Director
CBRE | UK Planning
Henrietta House, Henrietta Place, London, W1G 0NB

[REDACTED]

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Representations to Regulation 16 Consultation of the Overton Neighbourhood Development Plan (2025-2044)

CBRE Planning on behalf of Land Investment Projects Limited

16 October 2025

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1. Introduction

- 1.1 On behalf of Land Investment Projects Limited (hereafter 'CEG'), we welcome the opportunity to provide comments on the Regulation 16 Consultation of the Overton Neighbourhood Development Plan (2025-2044) ('the draft Plan' hereafter). CEG are working on behalf of the landowner, Portals Paper Limited (hereafter 'Portals'), in relation to the land at Overton Mill, Overton (hereafter 'the Site').
- 1.2 CEG are supportive of the Overton Neighbourhood Plan (hereafter 'ONP') and the principle of draft Policy H2: Land at Portals Mill. However, CEG strongly object to several of the criterion contained within the policy, as well as some of the policy's supporting text, on the basis that they fail to meet the requisite Basic Conditions Tests as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.
- 1.3 The identified criterion, do not have regard to national policies; fails to be in general conformity with strategic policies of the development plan; and restricts the achievement of sustainable development. These representations set out our concerns in detail. For clarity, our primary concerns are:

1. Proposed Settlement Boundary

The proposed settlement boundary does not include the entirety of the proposed Overton Mill allocation and appears to wrap around the existing/proposed built form. Development of the site will not only involve the delivery of physical buildings but will also include, green infrastructure, open space and drainage. The full extent of the proposed allocation should be included within the settlement boundary to ensure that all elements of the proposed development can be delivered and sustainable development can be achieved. If this is not amended, it does not fulfil Part D of the Basic Conditions Test.

2. Deliverability

Draft Policy H2 is an extremely lengthy policy that contains prescriptive criteria, that, in several places compete with one another in seeking to control and shape development of a complex brownfield site. The policy as drafted would fundamentally alter the deliverability if viability is not taken into account. It is for decision makers to weigh up evidence in the event not all criteria can be delivered.

The policy wording should be amended to provide an appropriate framework within which a decision maker can weigh up any competing requirements in order to ensure that the most sustainable form of development is delivered. Without these changes the policy fails to meet Part D of the Basic Conditions Test.

3. Criterion i (proposed uses)

The inclusion of employment and retail as proposed land uses do not meet Basic Conditions Test (Parts A, D and E). There is no quantifiable evidence which demonstrates there is a justifiable need for these uses within the draft Overton Mill allocation. Their inclusion clearly conflicts with both national and local planning policies as there is no evidence which identifies the site as a suitable and appropriate location for a specific employment use to meet a need in the area. The retail component is fundamentally inconsistent with national and local policies in the absence of any evidence to support a need, and that retail provision on the Site would not impact the vitality and viability of the designated Overton District Centre.

The inclusion of these land uses goes to the heart of the allocation, impeding the delivery of a sustainable development.

4. Criterion ix (historic buildings)

This criterion has been included in the absence of a comprehensive heritage assessment and contravenes Section 13 of the National Planning Policy Framework (NPPF) which sets out a clear hierarchy in the assessment of heritage assets in planning applications. Therefore, this criterion conflicts with parts a and d of the Basic Conditions Test and should be deleted.

5. Criterion xxvi (surface water)

This criterion clearly conflicts with strategic policies both in the NPPF and the adopted Local Plan. Connections to the network are captured within separate legislation, the Water Industries Act 1991, and therefore should be deleted as it is not a matter which should be included within planning policy. It does not accord with Parts A and E of the Basic Conditions Test.

- 1.4 Our representations provide further commentary and justification on why the above and other draft criterion should be removed and/or amended prior to the ONP being made, in consideration to the Basic Conditions test.
- 1.5 Representations were made previously by CEG to the Regulation 14 consultation of the Neighbourhood Plan. CEG have engaged with Overton Parish Council in the preparation of the draft Plan. These representations provide further justification on the proposed amendments to ensure a deliverable residential development on the site. A planning application is being prepared by CEG for submission in November 2025.
- 1.6 In light of the above concerns, it is considered that a public hearing would be a suitable forum for these issues to be properly discussed and tested. We request to participate in an Examination Public Hearing on the Neighbourhood Plan.

The Site

- 1.7 The Site is located to the north of Quidhampton, north of Overton, and extends to approximately 17.44 hectares.

- 1.8 The brownfield site straddles the railway line and historically operated as a paper mill, with Portals ceasing formal operations on site in October 2022. Portals still occupy the site and are currently undertaking a decommissioning programme.
- 1.9 The existing buildings/ structures across both the northern and southern parcels are redundant following the closure and are proposed to be demolished to facilitate a new residential development which will be the subject of a forthcoming planning application.
- 1.10 The Site is adjacent to Overton railway station, providing frequent services to London and Salisbury, and limited extensions to Bristol and Exeter. The Site currently benefits from excellent connectivity to Overton train station. The Site also benefits from proximity to bus routes, with existing amenities and services in Quidhampton and Overton being within walking and cycling distance.
- 1.11 The principle of a draft allocation on the site complies with the NPPF in making effective use of brownfield land, whilst meeting Overton's housing requirement. The draft allocation is therefore considered to be in conformity with the strategic priorities of the adopted Local Plan.

2. Planning Context

Overton Mill Draft Local Plan Site Allocation – Policy SPS5.10

- 2.1 The Site benefits from a draft allocation (Policy SPS5.10 – Overton Mill) in BDBC's draft Local Plan, which underwent a Regulation 18 Consultation in early 2024.
- 2.2 CEG recognise that components of draft Policy H2 (Land at Portals Mill) of the draft ONP reflect the draft allocation within the BDBC Regulation 18 draft. Since 2024 discussions with BDBC have progressed in relation to the proposed land uses following the Regulation 18 consultation and this is considered further below.
- 2.3 Due to changes in the National Planning Policy Framework (NPPF) and associated housing requirement, BDBC have advised that they will hold a further Regulation 18 consultation in Autumn/Winter 2025 as set out in the Local Development Scheme (February 2025).
- 2.4 A Local Plan Updated Proposed Spatial Strategy was represented to BDBC's Environment and Infrastructure Committee on 4 September 2025, which stated: 'The Regulation 18 Local Plan included a draft allocation at Overton Mill. This brownfield site opportunity has since been allocated in the draft Overton Neighbourhood Plan and therefore it is no longer necessary to also allocate it in the Local Plan'. The allocation of the Site in the ONP would therefore be consistent with the approach of the draft and emerging Local Plan.

3. Housing Requirement

- 3.1 We have set out our comments on the draft Plan in chronological order which reflects the ordering within the submission version. This section relates specifically to the paragraphs setting out the housing requirement (Section 6) for Overton within the draft ONP.
- 3.2 CEG are supportive of the draft allocation at Overton Mill to accommodate a substantial number of residential dwellings to positively contribute to housing requirement at Overton. The aforementioned Local Plan Updated Proposed Spatial Strategy paper, included the proposed housing figures for settlements in the Borough, with Overton identified to deliver 410 homes. Guidance on the preparation of neighbourhood plans¹ states that the reasoning and evidence informing the local plan preparation process is likely to be relevant to the consideration of the basic conditions against which a neighborhood plan is tested. It refers to the example of an up-to-date housing need evidence as being relevant to the question of whether a housing supply policy in a neighborhood plan contributes to the achievement of sustainable development.
- 3.3 As such, in order to ensure the ONP meets Basic Condition Part A, the housing figure within the ONP should be updated to reflect the housing requirement within the draft Settlement Strategy update. This would represent the most up to date evidence base pertaining to housing numbers for Overton.
-

¹ PPG Paragraph 009 Reference ID: 41-009-20190509

4. Overton Settlement Policy Boundary (Policy H1)

- 4.1 This Section relates to draft Policy H1 in the ONP.
- 4.2 CEG consider the draft policy and settlement policy boundary as shown in figure 3 of the ONP conflicts with the Basic Conditions Part D in achievement of sustainable development.
- 4.3 CEG are supportive of the principle of amending the settlement policy boundary to include the proposed development at Overton Mill, however consider the settlement boundary is incorrect. All development to come forward as part of the proposed site allocation should be included within the settlement boundary to provide and secure a *sustainable* development, for example the open space and wider green infrastructure.
- 4.4 Please see below the extent of land (in red) which should become part of the settlement boundary:



- 4.5 A scaled plan of the above image is set out in Appendix B.

5. Land at Portals Mill (Policy H2)

- 5.1 This Section relates to the draft Policy H2 (Land at Portals Mill).
- 5.2 CEG welcome and support the inclusion of Overton Mill as the proposed allocation to meet the Parish's housing requirement. As technical investigation and masterplan testing has progressed, this has evidenced that approximately 400 homes can be delivered on the site.
- 5.3 We set out our comments to the proposed criterion within draft Policy H2 below and commentary on their departure from the Basic Conditions test. We then provide our proposed amendments to the criterion for them to fulfil the Basic Conditions requirement, using ~~red strike-through text~~ for proposed deletions, and **blue text** for proposed additions. For avoidance of doubt, we have no comments to make on criterion which are not set out below.
- 5.4 We have appended an 'amended' version of the policy which incorporates the proposed deletions and additions set out Appendix A.

Viability

- 5.5 Draft Policy H2 provides an extensive list of criteria for a development proposal to meet. As currently drafted the Policy is an absolute set of requirements which does not provide the appropriate flexibility to be able to balance what may well be competing requirements.
- 5.6 Paragraph 129 of the NPPF states:
- "Planning policies and decisions should support development that makes efficient use of land, taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change;
 - and e) the importance of securing well-designed, attractive and healthy places."
- 5.7 Overton Mill is a unique and complex brownfield site and as drafted, Policy H2 is silent on viability considerations and fails to provide a suitable flexible framework for any decision

maker to balance what are potentially competing interests of the policy criteria. We therefore propose the amended wording set out in paragraph 5.10 is added to the policy.

- 5.8 The supporting text should also be explicit in its recognition that the specific and extensive criterion included within the draft policy will be subject to deliverability and viability considerations. This is to ensure applicants have the ability to demonstrate to the decision maker evidence in the event particular circumstances arise which results in not all criteria being deliverable.
- 5.9 The change to 'seek to' within the opening sentence of the policy will provide a suitable framework for decision-making in accordance with the paragraph 39 of the NPPF. The paragraph requires 'decision-makers at every level should seek to approve applications for sustainable development where possible'. The incorporation of 'seek to' will enable decision-makers to be flexible when taking into account the requirements of paragraph 129 of the NPPF.
- 5.10 In order to ensure the Policy provides an appropriate framework for the decision maker to undertake that balance at the application stage it should be amended to include:
- 'The site, as shown on the Policies Map (figure 4), is allocated for a well-designed and sustainable development that will [seek to \(subject to viability considerations\):](#)'
- 5.11 In the absence to a direct reference to deliverability and viability the draft policy is in breach **of Parts A and D of the Basic Conditions Test.**

Criterion i.

- 5.12 This criterion sets out the required land uses for the proposed site allocation. Other than residential, there is no evidence within the supporting evidence base to the ONP that small-scale employment and retail uses are required, based on a local need or for future development at the Site to be sustainable. Their inclusion is in **conflict with Basic Conditions test Parts A, D and E to achieve sustainable development.** Further detail in respect to each use is set out below.
- 5.13 **Employment:** The Site is not a strategic employment site within the adopted Local Plan, where policy protects identified areas for employment use. Employment need for the Borough is established through strategic employment areas within the Local Plan, and adopted Policy EP2 directs new employment uses to the strategic sites or sites 'where the employment use is of a scale and type appropriate to the sites location'. The NPPF in paragraph 87 states policies should recognise and address the specific locational requirements of different sectors.
- 5.14 Policy EP1 of the adopted Local Plan only supports employment use on identified sites where the use is of a scale and type appropriate to its location, and where outside of existing Strategic Employment Areas there are 7 specific criteria which proposals would need to comply with, one of which is need. There is no evidence base supporting the ONP which identifies an employment need or justifies 'small-scale' employment in this location.

- 5.15 Furthermore, CEG have met with the Planning Policy Team at BDBC in early 2025 who verbally agreed to the omission of the employment provision in the next iteration of the draft Local Plan policy.
- 5.16 On this basis, in the absence of numerical data to quantify an employment need in Overton and on the Site, it **does not comply with the Basic Conditions test Parts D and E** to achieve sustainable development and should be removed.
- 5.17 **Retail:** Paragraph 90 of the NPPF is clear in that planning policies should direct town centre uses to existing centres, to support their long-term viability and vitality. Local Plan Policy EP3 sets out the hierarchy of centres within the Borough, of which Overton District Centre is identified. Both national and local policy states that main town centre uses outside of defined centres will only be permitted if following a Sequential Assessment, it is demonstrated that the development could not be accommodated within or edge of centre and there is no impact on the vitality and viability of the centres.
- 5.18 There is no quantifiable evidence within the supporting evidence base to the ONP that retail provision is required in this location and that such provision would not impact the vitality and viability of the existing Overton District Centre, thus inhibiting delivering sustainable development. This is particularly relevant when taking into account the number of dwellings proposed and the existing facilities available within the designated District Centre.
- 5.19 On this basis, the current inclusion of retail clearly **conflicts with Parts A, D and E of the Basic Conditions test.**
- 5.20 **Custom and Self Build Homes:** Overton Mill is a complex and constrained brownfield site, comprising a significant number of large buildings in the northern parcel as well as the former water treatment works in the south which are extensive in their footprint. Whilst CEG recognise the ambition of the Parish to include a provision of custom and self-build homes, viability considerations and site-specific circumstances have not been taken into account in the draft allocation.
- 5.21 Given the site-specific circumstances at Overton Mill, it is therefore proposed to remove the 5% provision within the draft Neighbourhood Plan allocation policy.
- 5.22 Proposed amendments
- 'Make provision for the delivery of:
- a) Approximately 400 homes ~~including 5% serviced plots for custom and self-build homes;~~
 - ~~b) Small-scale employment (Classes E(g), B2 and B8) and retail (Class E) uses; and~~
 - c) Parking facilities for the railway station'.

Criterion ix.

- 5.23 This criterion was a new addition in the Regulation 16 consultation and is considered to be in **conflict with Basic Conditions Parts A and D** and should be deleted.
- 5.24 Section 16 of the NPPF is clear in that proposals when assessing potential impact on heritage assets this should be assessed in a planning applications. Paragraph 216 goes on to state 'a balanced' judgement will be required to the scale of any harm or loss and the significance of the heritage asset.
- 5.25 Separate Development Management discussions with the statutory consultees are ongoing in regards to heritage. On this basis, it is not for policy to require this 'criterion' but if required should be requested through pre-application engagement. Therefore, if included the criterion would not have regard to national policies and be in **breach of Part A of the Basic Conditions test.**
- 5.26 The inclusion of this criterion would inhibit the delivery of sustainable development on the Site. CEG will be undertaking a heritage assessment as part of a future planning application, however in the absence of this formal assessment and consultation with stakeholders, the inclusion of this criterion predetermines this outcome. The criterion **does not fulfil Part D of the Basic Conditions test.**
- 5.27 Proposed amendments
~~'Encourage the retention of buildings of historic value within the site. The layout and appearance of selected parts of the development are encouraged to integrate with these historic buildings to reflect the industrial nature and character of the site.'~~

Criterion x.

- 5.28 The criterion as drafted is inconsistent with Chapter 16 of the NPPF, namely paragraph 216 in considering and assessing the potential impact of development on the significance of heritage assets, and **therefore fails the Basic Conditions test Part A.** The NPPF allows for a balanced judgement, therefore the criterion should be amended to reflect the wording below. This would follow the terminology of the NPPF to ensure the consideration of the impact of the proposed development is assessed consistently at all policy levels when assessing any future planning application for the site against an allocation.
- 5.29 Proposed amendments
~~'Ensure there is no unjustified adverse impact on the significance of heritage assets, or on the ability to appreciate significance, caused by development within the setting of neighbouring heritage assets including Overton Conservation Area and listed buildings such as Quidhampton Farmhouse. Ensure consideration of the impact of the proposed development on the significance of neighbouring heritage assets including Overton Conservation Area and listed buildings such as Quidhampton Farmhouse.'~~

Criterion xiii.

- 5.30 The criterion **would fail Part A of the Basic Conditions Test.**
- 5.31 Paragraph 193 of the NPPF sets out four principles to which should be adhered to in determining planning applications in relation to biodiversity and Sites of Special Scientific Interest. The criterion wording as currently drafted would be in conflict with paragraph 193 as national policy does include exception circumstances to when an adverse effect may be permitted.
- 5.32 We have suggested two amendments to ensure compliance.

5.33 Proposed amendment

‘Protect and enhance the ecological network by ensuring adverse impacts on priority species and habitats are avoided, adequately mitigated, or compensated as a last resort, avoiding the loss or deterioration of irreplaceable habitat, and securing the creation and management of green open spaces and linkages that provide high levels of habitat connectivity within the site and to the wider green infrastructure network and the forthcoming Hampshire Local Nature Recovery Strategy. This will include ensuring that the development does not result in [adverse](#) harm to the Site of Special Scientific Interest (The River Test) and the adjoining Site of Importance for Nature Conservation (SINC) [subject to the national exception test.](#)

Criterion xiv.

- 5.34 The drafting of this criterion fails to meet Part D of the Basic Conditions Test.
- 5.35 We do not consider that the current wording proposed contributes to the achievement of sustainable development. There is no justification for on-site mitigation measures to be ‘robustly’ demonstrated. In addition, we consider there to be ambiguity in the current wording proposed in respect to the provision of off-site nutrient neutrality credits, which are an agreed, statutory mechanism for developers to offset the nutrient pollution. Whilst on-site mitigation measures should be explored in the first instance, we consider the current wording to be too strong and **not in accordance with the pursuit of sustainable development as per Part D of the Basic Conditions Test.**
- 5.36 We have suggested the following amendments to ensure compliance with the Basic Conditions Test.

5.37 Proposed amendment

‘Demonstrate, via a nutrient mitigation strategy, and supporting nutrient budget, that nutrient neutrality can be achieved in perpetuity to avoid significant adverse effects on the integrity of the Solent designated sites from increased wastewater from the development. This should be via on-site mitigation measures unless it can be robustly demonstrated that

this is not **reasonably** achievable, in which case off-site mitigation (**including off-site nutrient neutrality credits**) would be required.

Criterion xviii.

5.38 This criterion references both employment and retail uses, therefore the reasons set out under criterion i above in **failure to meet Part D of the Basic Conditions test**, this should be removed.

5.39 Proposed amendments

'Ensure that the scheme design and layout demonstrably respond to noise impacts arising from the railway, any traffic within the site vicinity ~~and the proposed retail/employment uses~~, in order to optimise noise mitigation by good acoustic design.

Infrastructure

Criterion xxiii.

5.40 CEG are undertaking further investigation in relation to the levels on the site, and whilst CEG are seeking to integrate the development into the existing PRoW network further investigation and discussions with external stakeholders are ongoing. To fully comply with this criterion, the development would need to be subject to detailed design which is unknown at this time. Therefore, to ensure a sustainable development which can be physically delivered, two amendments are proposed to this criterion, as detailed highways feasibility studies and assessments will be required in parallel to the detailed design of the scheme.

5.41 In the absence of the two additions, the criterion would also undermine Chapter 12 of the NPPF in creating 'well designed places', namely paragraph 137 where design quality should be considered throughout the evolution and assessment of individual proposals. Therefore, it is considered the criterion **fails to achieve Parts A and D of the Basic Conditions test**.

5.42 Proposed amendments

'Make provision on site for a dedicated network of segregated walking and cycling routes that integrate with existing and proposed external routes and to the wider Public Rights of Way network. This includes maintaining the **general** alignment of the Byway (**subject to a highways assessment**) which runs north-south through the eastern part of the northern site and enhancing the rural tranquility of the PRoW'

Criterion xxvi.

5.43 The drafting of this criterion is in conflict with the strategic policies in both the NPPF and the adopted Local Plan and therefore does not comply with parts a and e of the basic conditions test.

5.44 This is not a planning policy matter as connections to the current or adapted sewer network are captured under the Water Industry Act 1991. This is under separate legislation and whilst we understand this was requested by Southern Water, is under a separate process and therefore should not be included within draft Policy H2.

5.45 Policy CN6 of the adopted Local Plan states that new infrastructure should be secured prior to occupation of dwellings, with supportive text stating 'that development proposals need to identify clearly how they will accommodate growth and the provision of necessary infrastructure in the creation or enhancement of sustainable communities.' The criterion as drafted is in clear conflict with the Local Plan policy and the separate legislative process therefore this criterion would **fail the Basic Conditions Test in regards to Parts A and E.**

5.46 Proposed amendments

~~'To minimise the risk of sewer flooding and protect water quality, surface water from the new development will not be permitted to discharge to the foul or combined sewer network'~~

6. Land at Portals Mill – Supporting Text

6.1 This Section sets out rationale for amendments to the supportive text to draft Policy H2 in the context of the Basic Conditions Test.

6.2 We set out below our comments in respect of the supporting text which follows on from draft Policy H2 (Land at Portals Mill); comprising paragraphs 45-60 and Figure 4 – ‘Overton Mill Concept Plan’.

Paragraph 45

6.3 In respect of paragraph 45, we propose the removal of reference to provision of small-scale employment and retail uses in tandem with the reasoning set out above in relation to criterion (i). In addition, the supporting text as currently proposed is overstated in its requirement of providing additional car parking at Overton railway station. CEG are committed to formalising the existing parking facilities on land within their ownership through the potential re-opening of the former car park accessed off Station Approach. We consider supporting text should focus on improving active travel routes.

6.4 Paragraph 45 states the development will include ‘a range of suitable dwelling types and tenures including 40% affordable housing’. CEG acknowledge that adopted and emerging Local Plan policy seek a 40% threshold which will be targeted at Overton Mill, however the supporting text should recognise that the quantum of affordable housing **is subject to viability testing** if below the policy threshold. This approach is reflected in both the NPPF and the adopted Local Plan, therefore without this inclusion **fails Parts A and E of the Basic Conditions test**.

Paragraph 46

6.5 For paragraph 46, for consistency with our commentary on the above criterion, we propose the removal of reference to the provision of the employment and retail uses.

Paragraph 50

6.6 The sentiment in this paragraph is acknowledged in respect to OPC’s view on a small retail outlet close to the railway station, however as set out in our response to criterion (i), we consider reference to retail should be removed from the draft allocation.

Paragraph 51

6.7 Whilst we welcome and support the landscape qualities of the surrounding area, and the commitment to enhancing the existing tree belt buffer on the development boundaries, we do consider the statement ‘groups of trees in both the northern and southern parts of the site should be retained and enhanced’ conflicts with criterion (viii). A blanket tree retention policy would significantly conflict with and inhibit the principle of making efficient use of

the land, and whilst CEG are committed to delivering a high quality landscape scheme, there may be circumstances in which small groups of trees may need to be removed to facilitate development.

- 6.8 If this terminology is not amended the paragraph would conflict with paragraph 136 which states trees should be retained wherever possible, therefore sole retention **would not fulfil Part A of the Basic Conditions test.**

Paragraph 52

- 6.9 CEG welcome the amendments made to paragraph 52 in relation to proposed heights of new housing development, particularly the recognition that higher density up to 4 storeys may be considered adjacent to the station. In relation to the remainder of the site, the paragraph states:

‘new housing development should be predominantly of no more than 2-storeys in height with consideration being given to the limited use of taller buildings provided that this does not harm the rural setting of the site.’

- 6.10 The wording provides sufficient protection in regards to taller buildings not having an adverse effect in landscape character and visual impact terms, however we consider a massing range of 2-3 storeys would be appropriate for both the northern and southern plots, subject to the requisite landscape and visual impact testing. The change to a range of storey heights would positively contribute to accordance with the NPPF requirement to optimise the potential of sites and making efficient use of brownfield land, whilst conserving and enhancing the natural environment.

Paragraph 53

- 6.11 This paragraph should be removed in accordance with our justification under criterion ix and the **failure of this to accord with Parts A and D of the Basic Conditions test.**

Paragraph 60

- 6.12 Paragraph 60 should be removed on the basis that this requirement isn't reflected in draft Policy H2 and the removal of this clause has previously been agreed with BDBC's Planning Policy Team and the Parish Council. Furthermore, a Mineral Resource Assessment is not a requirement within the BDBC's validation list therefore this paragraph should be removed.

- 6.13 This paragraph is a conflict with Part E of the Basic Conditions test.

Paragraph 61

- 6.14 This paragraph states that 'development is also encouraged to provide improvements to Station Approach, to enable its adoption by Hampshire County Council.' Preliminary discussions have been held with the necessary stakeholders in regards to Station Approach and for the road to meet County's adoptable standards, this would require significant infrastructure works, including the removal of substantial tree belts and vegetation which could adversely impact biodiversity, notwithstanding substantial below ground investigation.

- 6.15 CEG are committed to formalising the existing parking facilities at the former car park, which will provide a betterment when compared with the operational nature of the parking facilities at present, however object to the inclusion for the development to improve Station Approach to adoptable standards.

Paragraph 64

- 6.16 It is acknowledged that the inclusion of this paragraph in relation to Gypsy and Travellers was at the request of BDBC following their Regulation 14 consultation response. As the evidence base in regards to Gypsy and Travellers has not been completed and will form part of the Local Plan update, we consider it is not for the draft Neighbourhood Plan to reference this potential inclusion, and it should be removed as it **does not accord with Part E of the Basic Conditions test.**

Overton Mill Concept Plan (Figure 4)

- 6.17 CEG welcome the updates made to Figure 4 in the Regulation 16 version of the draft Plan, however the concept plan must include all development, including open space to the east. Whilst a concept plan, this is linked to the criterion within the draft policy and therefore should be amended to comply with part d of the basic conditions test. The following amendments are proposed:

- The '*developable area*' label on the key should be amended to '***indicative** developable area*' (bold is our emphasis) to ensure flexibility and make clear the extent of the developable area has yet to be tested and finalised;
- Reference to the '*employment area*' should be removed in parallel with our comments in respect of draft Principles i., xiii., and paragraph 45 following agreement with BDBC;
- Open space in the eastern part of the development should be shown;
- The settlement boundary redrawn to include the full extent of the development as per our comments in an earlier section;
- The '*retained for open space*' label on the key should be amended to '***indicatively** retained for open space*' (bold is our emphasis) to ensure flexibility and make clear the development site and masterplanning has yet to be tested and finalised; and
- The '*existing tree belts/ hedges to be retained and enhanced*' should be amended to '***retention of** existing tree belts/ hedges to be retained and enhanced **where possible***' (bold is our emphasis) to reflect our comments in respect of draft Principle viii and accordance with paragraph 136 of the NPPF.

- 6.18 These aspects are reflected in the Key Principles Plan appended to this letter.

7. Housing Mix and Provision of Smaller Homes

- 7.1 This section set out commentary on draft Policy H4 against the Basic Conditions Test.
- 7.2 To accord with paragraph 66 of the NPPF, we suggest the following amendments to draft Policy H4:
- Proposals for residential development are required to provide a mix of dwelling types and sizes to address the nature of local needs and contribute to the objective of creating a mixed and balanced community;*
- i. All proposals for market housing, other than a single replacement dwelling, will be required to include at least one 1, 2 or 3- bed dwelling;*
 - ii. All proposals for market housing of more than 5 dwellings must include **at least half of** 1, 2 or 3- bed dwellings **in accordance with BDBC Adopted Local Plan Policy CN3 or the most up to date evidence**; and*
 - iii. Affordable housing should be provided in accordance with BDBC Adopted Local Plan Policy CN1 on Affordable Housing (or successor policy).*
- 7.3 The amendment to criterion ii of draft Policy H4 would ensure consistency with both national and adopted Local Plan policies which requires a mix of market housing based on local needs and site characteristics. Housing evidence and needs change throughout plan periods, therefore it is considered the **above amendments would ensure consistency and compliance with Part E of the Basic Conditions Test.**

8. Summary

- 8.1 CEG are supportive of the principle of the draft allocation at Overton Mill under draft Policy H2, however consider there are a number of amendments required to the allocation to satisfy the Basic Conditions Test for Neighbourhood Plans.
- 8.2 As set out in within this Report, several of the criterion currently drafted in the emerging Policy clearly conflict with the Basic Conditions Test. Primarily these relate to:
- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
 - d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development; and
 - e. the making of the order (or neighbourhood plan) 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).
- 8.3 The proposed amendments would ensure the delivery of a sustainable development to meet the evidenced housing needs of Overton, and in compliance with the National Planning Policy Framework and Strategic Local Plan policies.
- 8.4 We request to participate in an Examination Public Hearing on the Neighbourhood Plan. These representations set out the importance of why these issues need to be properly discussed in an open forum and tested. The discussion is key in ensuring the Neighbourhood Plan complies with the Basic Conditions Test.
- 8.5 We request to be notified of the Local Planning Authority's decision regarding whether the Overton Neighbourhood Plan is adopted.

Appendix A – ‘Amended policy wording’

Amended draft Policy H2

We set out below a ‘clean’ version of draft Policy H2, which considers our comments in full.

The site, as shown on the Policies Map (figure 4), is allocated for a well-designed and sustainable development that will seek to (subject to viability considerations):

- i. Make provision for the delivery of:
 - a. Approximately 400 homes; and
 - b. Parking facilities for the railway station;
- ii. Be in general accordance with the principles of the Concept Plan (Figure 4);
- iii. Ensure that the development will not have a severe adverse impact on the local highway network nor have an unacceptable impact on highway safety with the inclusion of suitable measures to mitigate the impact;
- iv. Demonstrate how ways to reduce the need to travel, prioritise and maximise the use of active travel and public transport use have been considered to minimise the transport impacts arising from the development;
- v. Demonstrate that safe, suitable and convenient access to local facilities and services, including Overton village centre, can be achieved by active travel or public transport services;
- vi. Ensure the development responds positively to, and takes opportunities to, safeguard and enhance the landscape and scenic beauty of the North Wessex Downs National Landscape, recognising the landscape qualities of the site; the built environment of Quidhampton and Overton; and the local distinctiveness of the area. The design and layout of the development on its outward facing edges will enable a suitable transition to the surrounding National Landscape;
- vii. Ensure that consideration is given to the siting, density, massing, scale, layout, hard and soft landscaping and character of the development in relation to its landscape context, which should have regard to the following:
 - a. The impact on the National Landscape, with particular regard to the landscape character of the National Landscape and views to, from and within the National Landscape, including from Public Rights of Way and viewpoints in the wider countryside of the North Wessex Downs;
 - b. Ensure there is a suitable transition between the areas of agricultural land to the east and west of the northern site parcel (within the site allocation boundary but outside of the settlement policy boundary) and the landscape character of the North Wessex Downs National Landscape. These areas of land should be retained for accessible natural greenspace to be used for recreational purposes only. The use of any sustainable drainage

systems (SuDS) within these open areas must be well integrated with the incorporation of appropriate landscaping

c. The setting of the adjoining Test Valley Valued Landscape;

viii. Retain existing trees wherever possible and take opportunities to enhance the structural landscaping of the site. Additional planting must be provided to reinforce existing tree belts along the northern and eastern boundaries of the built-up area, and will be in keeping with the landscape character of the area using suitable native species. Additional planting will also help to minimise the visual impact of the development on the National Landscape, including on views from publicly accessible countryside to the north, east and west of the site; and to reinforce existing groups of trees adjacent to the boundary in the southern part of the site;

viii. Ensure consideration of the impact of the proposed development on the significance of neighbouring heritage assets including Overton Conservation Area and listed buildings such as Quidhampton Farmhouse’;

viii. Ensure the protection of groundwater and sensitive receptors (including the River Test SSSI) given the site’s location on a principal aquifer. This can be achieved by undertaking a Hydrogeological Risk Assessment to inform development design, infiltration features and any necessary mitigation. This should include assessment of contamination migration risks from the historic landfill;

x. Demonstrate, via a Construction Environmental Management Plan (CEMP), that all potential sources of pollution from the development on the SSSI and the adjoining SINC can be mitigated. The sustainable use of construction, demolition and excavation waste should be maximised in line with the adopted Hampshire Minerals and Waste Plan;

xi. Protect and enhance the ecological network by ensuring adverse impacts on priority species and habitats are avoided, adequately mitigated, or compensated as a last resort, avoiding the loss or deterioration of irreplaceable habitat, and securing the creation and management of green open spaces and linkages that provide high levels of habitat connectivity within the site and to the wider green infrastructure network and the forthcoming Hampshire Local Nature Recovery Strategy. This will include ensuring that the development does not result in adverse harm to the Site of Special Scientific Interest (The River Test) and the adjoining Site of Importance for Nature Conservation (SINC) subject to the national exception test.

xii. The development will achieve a minimum 10% biodiversity net gain (BNG) with onsite and offsite habitat enhancements secured as appropriate under a Biodiversity Gain Plan in line with the statutory framework for BNG;

xiii. Undertake technical investigation and assessment of all sources of flooding (including surface water and groundwater) to determine flood risk management measures to ensure sustainable development and incorporate provision of on-site sustainable drainage systems (SuDS). This must include consideration of the drainage of surface water, including outfalls;

xiv. Demonstrate, via a nutrient mitigation strategy, and supporting nutrient budget, that nutrient neutrality can be achieved in perpetuity to avoid significant adverse effects on the integrity of the Solent designated sites from increased wastewater from the development. This should be via on-site mitigation measures unless it can be robustly demonstrated that this is not reasonably achievable, in which case off-site mitigation (including off-site nutrient neutrality credits) would be required;

- xv. Ensure that the scheme design and layout demonstrably respond to noise impacts arising from the railway, any traffic within the site vicinity, in order to optimise noise mitigation by good acoustic design;
- xvi. Take measures to minimise disruption to neighbouring properties and the wider parish during all construction phases;
- xvii. Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.

Infrastructure

- xviii. Make provision for suitable amounts of open/green space in accordance with the Borough Council's Green Space Standards, including the provision of allotments. This will need to be provided in a manner which is well related to the overall layout and character of the development and how it relates to its surroundings. This provision needs to incorporate effective green infrastructure links (incorporating pedestrian and cycle routes where appropriate) within and through the development (utilising appropriate planting in order to support their biodiversity and landscape function), and which link to the surrounding countryside, habitats and Public Rights of Way network. The delivery of green space and play areas will need to be provided alongside development parcels in order that there are facilities for residents to use by the time that housing is occupied;
- xiv. Ensure that safe and convenient access will be provided to the highway network, via Papermill Lane and Kingsclere Road (B3051). Both access options will be contingent on assessment by the highways authority for suitability and safety;
- xx. Suitable pedestrian and cycle access routes should be provided between Overton train station (Platforms 1 & 2) and the land to the north and south of the railway line;
- xxi. Make provision on site for a dedicated network of segregated walking and cycle routes that integrate with existing and proposed external routes and to the wider Public Rights of Way network. This includes maintaining the general alignment of the Byway (subject to a highways assessment) which runs north-south through the eastern part of the northern site and enhancing the rural tranquillity of the PRoW;
- xxii. Occupation of the development will need to be phased to align with the delivery of public sewerage infrastructure, in consultation with the service provider;
- xxiii. Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes;
- xxiv. New homes will be required to meet either a water efficiency standard of 100 litres or less per person per day, or any future national standard, whichever is lower.

Appendix B - 'Key Principles Plan'



National Landscape





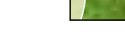



27 SPON STREET, COVENTRY, CV1 3BA
 T: +44 (0)24 7652 7600 E: info@idpgroup.com

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Do not scale.

All dimensions to be checked on site and architect notified of any discrepancies prior to commencement.
 Any and all elements relating to the fire safety of the project will require separate confirmation and approval by a fully accredited fire engineering consultant under separate client appointment.

Key:

-  Site Boundary
-  Existing Streets
-  Development Area
-  Public Open Space/Green/Blue Infrastructure
-  Formalise Station Car Parking
-  Existing Trees and Hedgerows
-  Indicative New Planting
-  Vehicular Access Points
-  Emergency Vehicular Access Points
-  Public Right of Way (B.O.A.T)
-  Proposed Pedestrian / Cycle Routes
-  Railway Station

Rev: _____ Comments: _____ Date-Name-Check: _____

Drg No: **SK 004 Rev -**

Client: CEG

Project: Overton Mill

Title: Key Principles Plan

Scale: 1: 1250 @ A0 Date: 12.02.25

RIBA: Stage 0 Dm/Ch: TEE/BDF

Status: **PRELIMINARY**

Pro. No: **C5928**



Victoria Corrigan

From: Planning Consultations <[REDACTED]>
Sent: 16 October 2025 16:12
To: Local Plan
Cc: Transport Policy; Planning Consultations
Subject: RE: Notification of Publication of the Overton Neighbourhood Plan 2025-2040 (Regulation 16)
Attachments: Overton_Reg16_FINAL.pdf

**** PLEASE NOTE: This message has originated from a source external to Basingstoke & Deane Borough Council, and has been scanned for viruses. Basingstoke and Deane Borough Council reserves the right to store and monitor e-mails ****

Good afternoon,

Please find attached Hampshire County Council's response to the Overton Neighbourhood Plan Regulation 16 consultation.

If you have any questions about the response, please don't hesitate to contact me on the below details.

Kind regards,

Joe Moulding
Spatial Policy Officer

[REDACTED]
Hampshire 2050
E11 Court West, The Castle, Winchester
Hampshire, SO23 8UL

From: Basingstoke and Deane Borough Council Online Consultation Portal <noreplyconsult@basingstoke.gov.uk>
Sent: 04 September 2025 12:30
To: Planning Consultations <planningconsultations@hants.gov.uk>
Subject: Notification of Publication of the Overton Neighbourhood Plan 2025-2040 (Regulation 16)

Caution: This is an external email and could contain malicious content. Do not open any links or attachments if you were not expecting them. If the e-mail looks suspicious, please report via the 'Report Phishing' Button found on your toolbar.

Basingstoke and Deane Borough Council is now in receipt of the submission version of the Overton Neighbourhood Plan (NP) along with all accompanying documentation required under the Regulations. The Submission Overton NP sets out a vision for the neighbourhood area and planning policies which will be used to determine planning applications locally and guide development in the neighbourhood area up until 2040. The Submission Overton NP is subject to formal public consultation until **5pm on Thursday 16 October 2025**.

What does the Overton Neighbourhood Plan consist of and where can it be viewed?

The Submission Overton NP consists of the following:

- Overton Neighbourhood Plan
 - Appendix A – Design Guidance and Codes
 - Appendix B – Indicative Housing Requirement
 - Appendix C – Important Views
- Changes to Settlement Policy Boundary
- Discussion of the exclusion of Court Drove sites
- Modification Proposal Statement
- Policy Map Booklet
- Consultation Statement
- Basic Conditions Statement
- Equalities Impact Assessment
- SEA Environmental Report
- HRA Report
- SEA & HRA Screening Report
- SEA Decision Notice

These submission documents are available to view on the council’s website at <http://www.basingstoke.gov.uk/ONP>.

These submission documents, along with a guidance note, are also available for public inspection at:

- **Basingstoke and Deane Borough Council Offices** (Mondays to Friday 8:30am - 4.30pm);
- **Basingstoke Discovery Centre** (9:30am - 5pm on Mondays to Saturday, except for Tuesday which is 9:30am - 1:30pm)
- **Overton Library** (9:30am-1:30pm on Tuesdays, Wednesdays and Saturdays and 1pm-5pm on Thursdays)
- **Whitchurch Library** (1pm-5pm Monday and Wednesdays and 9:30am and 1:30pm on Fridays and Saturdays)
- **Overton Parish Council Office** (9:30- 1:30pm Wednesdays)
- **The Red Lion Pub**, 37 High Steet Overton, RG25 3HQ
- By contacting Richard Oram from the **Parish Council** via email richard.oram@overtonparishcouncil.gov.uk or phone 07983 992600.

How can you make your representations?

Representations in relation to the Overton NP and supporting documents should be submitted to the borough council using one of the following methods:

- online response form via the [council's consultation portal](#).
- return representation form or submit written comments by post to: Planning Policy Team, Basingstoke and Deane Borough Council, Civic Offices, London Road, Basingstoke RG21 4AH
- return representation form or submit written comments by email to: local.plan@basingstoke.gov.uk

Only those representations that are made in writing and that are received by the council within the consultation period (5pm on Thursday 16 October 2025) will be considered. All responses will then be forwarded to the plan’s examiner once they are appointed.

When making your representation, please can you indicate whether you wish to participate in an Examination Public Hearing (should the examiner decide there is a need for one) and also whether you wish to be notified about the Examiner’s Report and the ‘Made’ Overton NP.

If you require further information, or advice on how to respond to this consultation please contact Basingstoke and Deane Borough Council's Planning Policy Team by telephoning 01256 844844 or by emailing the team at local.plan@basingstoke.gov.uk.

This email has been sent to all of the people and organisations on the council's mailing list.

You can manage your subscriptions or unsubscribe from the mailing list using the links at the end of this email. Alternatively, please let us know by email local.plan@basingstoke.gov.uk if you no longer wish to receive communications from us so we can update our records.

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Planning Policy Team

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Planning Policy Team
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Council
Civic Offices
London Road
Basingstoke
RG21 4AH

Hampshire 2050
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Winchester, Hampshire SO23 8UL
Telephone 0300 555 1375
Fax 01962 847055
www.hants.gov.uk

Enquiries to

Joe Moulding

My reference

Overton_Reg16_Con

Direct Line

[REDACTED]

Your reference

Date

16/10/2025

E-mail

[REDACTED]

Dear Sir/Madam,

Overton Neighbourhood Development Plan – Regulation 16 consultation

Thank you for consulting Hampshire County Council on the Overton Neighbourhood Plan. At this regulation 14 stage of neighbourhood plan making, the County Council provides the following response in its capacity as the Local Highway Authority.

The County Council adopted the [Hampshire Local Transport Plan \(LTP4\)](#) in February 2024, and the policies contained within it. LTP4 is the strategic transport plan for the County and the policies within it will have notable influence on the successful delivery of some of the policies and outcomes contained within the Neighbourhood Plan, and vice versa. Please find the detailed comments from the Highway Authority on the relevant policies in the plan.

Policy H2: Land at Portals Mill

Hampshire County Council as Highways Authority consider that the former Overton mill site allocation as housing could provide a well-designed and sustainable development, given the proximity of a train station which links directly to London and the South West. The ambition for a small retail outlet close to the rail station is supported and would likely help meet the day-to-day needs of residents without obliging them to drive.

Key points to consider:

- Vehicular access via Papermill Lane to the north is dependent on measures to improve the constraints associated with the railway tunnel.

- The main active travel route from the development into Overton is likely to be via Station Approach which is an unadopted road. Any future developer should work in partnership with the Highway Authority to seek that this route accords with appropriate design and construction standards, to enable its adoption and so secure its long-term maintenance. This route may also serve as a development access.

The County Council continue to note differences between the Neighbourhood Plan and the draft Local Plan with regard to the role of the site access via Kingsclere Road (B3051), with paragraph 46 of the Neighbourhood Plan proposing this for all vehicles whilst Policy SPS5.10 of the draft Local Plan proposes that this access point is intended for emergency vehicle access only. The County Council cannot comment on the suitability of either approach until further assessment work has been undertaken, including traffic distribution, access safety, and wider highway impacts.

Policy LEB1: Local Landscape

With regards to light pollution from new development proposals. Street lighting can play an important role for many people in feeling safe and confident travelling around at night, particularly on foot or by bike, and the absence of which can be discourage trips by active modes. The County Council continues to recommend that key active travel routes within Overton, particularly new or improved routes resulting from new development proposals, be lit at night in an appropriate way. Please see Hampshire County Council's current guidance on street lighting, which includes our requirements for developers in the context of ecological concerns - [TG13 - Street Lighting](#).

Policy ATP1: Active Travel

The County Council welcomes this policy and notes the intention to increase opportunities for active travel both within the site and to and from other parts of Overton village. This policy could be further strengthened by referencing the County Council's [TG10 – Pedestrian and Cycle Facilities](#) which details our current requirements for active travel infrastructure design. TG10 incorporates national guidance including the DfT's Local Transport Note (LTN) 1/20 and Healthy Streets approach.

Policy H5: The Overton Design Code

As above, Hampshire County Council will only support highway infrastructure schemes which are designed in accordance with the County Council's technical guidance, available here: [Technical guidance notes | Transport and roads | Hampshire County Council](#).

I trust that these comments are of assistance to you. If you wish to discuss any of the comments raised, please do not hesitate to contact my colleague Joe Moulding with the email supplied on the first page.

Yours sincerely



Emily Howbrook
Strategic Manager - Planning

Victoria Corrigan

From: Ian Elkins <[REDACTED]>
Sent: 15 October 2025 09:19
To: Local Plan
Subject: Fwd: Response to Overton Neighbourhood Plan
Attachments: BD NP REP FORM.pdf

**** PLEASE NOTE: This message has originated from a source external to Basingstoke & Deane Borough Council, and has been scanned for viruses. Basingstoke and Deane Borough Council reserves the right to store and monitor e-mails ****

Please find attached Response to Consultation on Overton Neighbourhood Plan

Sent from my iPad

Begin forwarded message:

Date: 15 October 2025 at 08:55:47 BST
To: Ian Elkins <[REDACTED]>
Subject: Response to Overton Neighbourhood Plan



Basingstoke and Deane Borough Council

Representation form for the Overton Neighbourhood Plan 2025-2040

Overton Parish Council has submitted their Neighbourhood Plan to the Local Planning Authority (Basingstoke and Deane Borough Council) who are now consulting on the plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. The consultation runs from **Thursday 4 September until 5pm on Thursday 16 October 2025**.

Representations should be submitted by no later than **5pm on Thursday 16 October 2025** online at <https://consult.basingstoke.gov.uk/consultation/Overton-neighbourhood-plan-review-submissionregulation-16>. Representations can also be made by returning this form or writing to Basingstoke and Deane Borough Council.

by post to: Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH **by email to:** local.plan@basingstoke.gov.uk

This form has two parts:
Part A – personal details
Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

PART A

Personal details (if an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of

the agent in 2)

Title	Mr
First name	Ian
Last name	Elkins
Job title (where relevant)	
Organisation (where relevant)	Overton Parish Council
Address	████████████████████ ████████████████████
Postcode	████████
Telephone number	██████████
Email address	████████████████████

Agent's details (if applicable)

Title	
First name	
Last name	
Job title (where relevant)	
Organisation (where relevant)	
Who are you representing?	
Address	
Postcode	
Telephone number	

Are you responding as:

- | | | | |
|---------------------------------------|--------------------------|--------------------------------|-------------------------------------|
| An individual | <input type="checkbox"/> | A town or parish council | <input checked="" type="checkbox"/> |
| A district/borough council | <input type="checkbox"/> | A borough | <input type="checkbox"/> |
| On behalf of an organisation | <input type="checkbox"/> | On behalf of a community group | <input type="checkbox"/> |
| A landowner/developer/agent/architect | <input type="checkbox"/> | Other | <input type="checkbox"/> |

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Overton Neighbourhood Plan does your representation relate to?

- a. Paragraph b. Policy c. Other

2. Do you support or oppose that part of the Overton Neighbourhood Plan?

- Support Oppose

Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

I strongly believe that the Overton Neighbourhood Plan (ONP) meets the basic conditions and other legal requirements and fully support it.

Overton is a thriving parish offering good homes and a range of modern services to its residents, yet at its heart it is a rural community with parishioners constantly highlighting (in parish surveys and directly to their representatives) the importance of the countryside, access and rights of way, cherished views and sustainability.

Residents are also aware of the need for good quality, well-designed homes with easy access to goods and services. It is for this reason that Overton is fortunate to have at its disposal a large brownfield site that meets its housing needs over the period set out in the ONP whilst protecting those aspects of village life most valued by the people who live there.

The allocation of the Portals Mill site and the design and housing mix requirements for the homes to be built there are consistent with national and local policies and guidance and afford protection to the surrounding natural landscape and environment, whilst achieving sustainable development. Policies on parking and maintaining a thriving village centre recognise the reality of living in a rural setting and the need for a sense of place. They do so by ensuring that businesses and services are centrally located and encouraged to expand to satisfy the needs of residents whilst respecting the historic nature of the village and supporting community cohesion.

Continue on next page or on a separate sheet if necessary

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

None

Continue on a separate sheet if necessary

The majority of neighbourhood plan examinations are expected to be through written representations. However, should the examiner decide there is a need for a public hearing, please state below whether you would like to participate.

3. If a public hearing is necessary would you like to participate?

a. No, I do not wish to participate at the examination public hearing

b. Yes, I wish to participate at the examination public hearing

4. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

N/A

Continue on a separate sheet if necessary

Data Protection Statement

In complying with the General Data Protection Regulation (GDPR), Basingstoke and Deane Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to the Overton Neighbourhood Plan consultation on the council's website. This will include publication of names of respondents and company names (where appropriate). Please ensure you do not include any personal information in Part B of the document. Copies of all consultation responses, including redacted versions of Part A, will be available to view at the council offices, and photocopies can be made of these representations on request.

By submitting representations, your details will be added to the Basingstoke and Deane Planning Policy Consultation database, and you may be contacted at future stages of the Overton neighbourhood plan process. All personal data will be processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation ('GDPR').

Personal information will also be shared with the appointed examiner, who may wish to contact you to discuss your comments and concerns, prior to the examination of the neighbourhood plan.

Please indicate below if you wish to be kept informed of the progress of the Overton Neighbourhood Plan and if you are happy for us to contact you.

a. If you wish to be notified of the Examiner's Report please tick box

b. If you wish to be notified of the 'Made' Neighbourhood Plan please tick box



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- we will share your information with the appointed examiner for the purpose of examining the neighbourhood plan
- we will not disclose any information to other organisations unless we are required by law to do so
- your personal details will only be held as long as is needed for this consultation and in accordance with our retention policy

For further details on how your information is used; how we maintain the security of your information and your rights, including how to access information we hold on you and how to complain if you have any concerns about how your personal details are processed, please visit www.basingstoke.gov.uk or email dpo@basingstoke.gov.uk

Victoria Corrigan

From: Jane Dooley <[REDACTED]>
Sent: 13 October 2025 09:21
To: Victoria Corrigan
Subject: Re: Overton Local Plan...

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Hi

My details are as follows:

Jane Dooley

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

I was trying to access the online form but could not get access yesterday.
If I manage to do that this evening - will it conflict with the email response?

Regards

Jane

From: Victoria Corrigan <[REDACTED]>
Sent: 13 October 2025 08:12
To: Jane Dooley <[REDACTED]>
Subject: RE: Overton Local Plan...

Dear Jane

Thank you for your representation on the Overton Neighbourhood Plan.

In order to accept your comments as a duly made representation for the consultation, we require a full name and address. Please could you provide your address as soon as possible, before the deadline of the consultation at 5pm on Thursday 16 October.

Kind regards

Victoria Corrigan
Senior Planning Policy Officer
Basingstoke and Deane Borough Council

[REDACTED]



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From: Jane Dooley <[REDACTED]>
Sent: 12 October 2025 14:44
To: Local Plan <local.plan@basingstoke.gov.uk>
Subject: Overton Local Plan...

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Hi

I wish to express my strong support for the current proposed Neighbourhood Plan. It is vital that the voices of local residents are heard and respected in shaping the future of their village. Overton's character, heritage, and natural environment are deeply valued by the community, and any development must reflect those priorities.

The draft plan rightly addresses key issues through tailored planning policies—covering new housing, alterations to existing properties, and the protection of green spaces. These policies will help ensure that growth is thoughtful, sustainable, and aligned with the needs and aspirations of those who live here.

Overton has a rich history and a unique identity that must be preserved through intelligent, well-guided development. As the village inevitably evolves, the Neighbourhood Plan will be an essential tool in managing that change with care and foresight.

I commend the breadth of the draft—it covers an extensive range of areas and demonstrates a genuine commitment to community-led planning. I urge the council to adopt and support this plan in full.

Jane Dooley

[REDACTED]

[REDACTED]

Victoria Corrigan

From: John Raw <[REDACTED]>
Sent: 14 October 2025 15:23
To: Local Plan
Subject: Overton Parish Council regulation 16 Comment submission
Attachments: Scan.pdf

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Dear Basingstoke and Deane Council,

Local Plan regulation 16 submission for Overton Parish Council Neighbourhood development plan.

From John Raw [REDACTED]

Personal submission in support of the OPC NDP.

Best Regards
John Raw

Please find accached official pdf of completed submission forms.



**Basingstoke
and Deane**

Basingstoke and Deane Borough Council

Representation form for the Overton Neighbourhood Plan 2025-2040

Overton Parish Council has submitted their Neighbourhood Plan to the Local Planning Authority (Basingstoke and Deane Borough Council) who are now consulting on the plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. The consultation runs from Thursday 4 September until 5pm on Thursday 16 October 2025.

Representations should be submitted by no later than 5pm on Thursday 16 October 2025 online at <https://www.basingstoke.gov.uk/council/overton-neighbourhood-plan-review-submission-guidance-1/>. Representations can also be made by returning this form or writing to Basingstoke and Deane Borough Council.

by post to: Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH
by email to: local.planning@basingstoke.gov.uk

This form has two parts:

Part A – personal details

Part B – your representations – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

PART A

Personal details (if an agent is completing please not provide the title, name and organisation details below but complete the full contact details of the agent in B)

Title	Mr
First name	John
Last name	Rand
Job title (where relevant)	
Organisation (where relevant)	
Address	
Postcode	
Telephone number	
Email address	

Agent's details (if applicable)

Title	
First name	
Last name	
Job title (where relevant)	
Organisation (where relevant)	
Who are you representing?	
Address	
Postcode	
Telephone number	

Are you responding as

An individual



A town or parish council



A district/borough council



A borough councillor/MP



On behalf of an organisation



On behalf of a community group



A landowner/developer/agent/contractor



Other



PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Overton Neighbourhood Plan does your representation relate to?

a. Paragraph

b. Policy

c. Other

2. Do you support or oppose that part of the Overton Neighbourhood Plan?

Support



Oppose



Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiners will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

I fully support the great efforts of Overton Parish Council in producing this plan. Especially the use exclusively in this development period for the development proposed to use the brown field site located on the former Bitalac Ltd Overton Mill Site

Comments on next page or on a separate sheet if necessary

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

The Portals Ltd site proposed for development must use permanently as main access a new junction on Kingsdare Road. Allowing also secondary access via Station Road and the road to Ashes Warren.

New Road access to the station London bound platform for bus, cycle and disabled access is also essential.

A new cafe / shop / retail premises near the station is also desirable.

Continue on a separate sheet if necessary

The majority of neighbourhood plan examinations are expected to be through written representations. However, should the examiner decide there is a need for a public hearing please state below whether you would like to participate.

3. If a public hearing is necessary would you like to participate?

a. No I do not wish to participate at the examination public hearing

b. Yes I wish to participate at the examination public hearing

4. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

I am deeply involved in transport in and around Acton. Especially promoting public transport, electric vehicles and cycling.

Continue on a separate sheet if necessary

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Victoria Corrigan

From: Johanna Thompson <[REDACTED]>
Sent: 15 October 2025 21:41
To: Local Plan
Subject: Comments on Overton Neighbourhood Plan (ONP)

Follow Up Flag: Follow up
Flag Status: Flagged

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Deal ONP Team,

Thank you for the opportunity to comment on the Overton Neighbourhood Plan. We support the draft ONP and recognise the effort and care that's gone into developing it. Our comments simply aim to ensure that one key issue — **safe and effective access to the Overton Mill development site** — is not overlooked.

The proposed development of around 400 dwellings represents a major increase in the size of the village. For it to succeed, transport, traffic and pedestrian planning must be robust. At present, the plan appears to rely solely on Papermill Lane for access (with emergency only access from Kingsclere road), which would not be sufficient or safe for a development of this scale.

A permanent access from Kingsclere Road (B3051) to the Overton Mill development site is essential.

This would:

- Integrate the new development more naturally with the rest of the village — shops, school, and community spaces — and prevent the Mill site from becoming an isolated satellite estate disconnected from village life.
- Spread traffic more safely across two routes, reducing congestion and risk on Station Road, which is effectively a single-lane road with cars parked along much of its length.
- Support pedestrian safety, as the crossing to Flashetts from Station Road, which is frequently used by schoolchildren and lacking a pavement, would otherwise face significantly increased traffic. Additionally, this route is used to access the train station by foot.
- Help slow traffic well beyond the village sign and before the Kingsclere Road bridge — similar to how the Two Gate Lane development has successfully calmed speeds on London Road (B3400).
- Recognise that the developer already plans to use Kingsclere Road for site access during construction, setting a clear and practical precedent for a permanent route.
- Acknowledge that all other large recent developments in Overton — including Two Gate Lane, Overton Hill, and Sapley Lane — have direct access from main roads, even though they are smaller in scale than the Mill site. It would therefore be inconsistent and unsafe for this much larger development to rely on a narrow residential route as its sole access.

In summary, we fully support the ONP's direction and ambitions but strongly urge that the **final plan commits to a permanent access from Kingsclere Road** as essential to safety, integration, and long-term success.

We would like to take part in the public examination please.

Kind Regards,

[Redacted signature block]

Victoria Corrigan

From: Nick Kirby <[REDACTED]>
Sent: 16 October 2025 11:20
To: Local Plan
Cc: Daniel Lampard; Mariam Ahmed
Subject: Overton Neighbourhood Plan consultation response [LICH-DMS.FID796290]
Attachments: Representation form Overton v2 16.10.2025.pdf

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Dear Planning Policy Team,

Please find attached representations (including 2 no. appended photos) to the submission version of the Overton Neighbourhood Plan, prepared by Lichfields on behalf of our client St Philips and the landowners working in conjunction.

We would appreciate your acknowledgement of receipt.

Kind regards

Nick Kirby
Planning Director
BA (Hons) MSc MRTPI
Lichfields, Apex Plaza, Forbury Road, Reading RG1 1AX
[REDACTED]
[REDACTED]

Lichfields.uk 



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Basingstoke and Deane Borough Council

Representation form for the Overton Neighbourhood Plan 2025-2040

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by post to: Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH

by email to: local.plan@basingstoke.gov.uk

This form has two parts:

Part A – personal details

Part B – your representation(s) – please identify which part of the document your comment relates to by completing the appropriate box. Additionally, please complete a separate form for each representation.

PART A

Personal details (if an agent is appointed, please complete only the

Title, Name and Organisation boxes below but complete the full contact details of the agent in 2)

Title	Mr
First name	Stuart
Last name	Field
Job title (where relevant)	Planning Director
Organisation (where relevant)	[REDACTED]
Address	C/O Lichfields
Postcode	[REDACTED]
Telephone number	
Email address	[REDACTED]

Agent's details (if applicable)

Title	Mr
First name	Nick
Last name	Kirby
Job title (where relevant)	Planning Director
Organisation (where relevant)	Lichfields
Who are you representing?	St Philips Land and Landowners
Address	Lichfields, Apex Plaza, Forbury Road, Reading
Postcode	RG1 1AX
Telephone number	[REDACTED]

Are you responding as:

- | | | | |
|---------------------------------------|-------------------------------------|--------------------------------|--------------------------|
| An individual | <input type="checkbox"/> | A town or parish council | <input type="checkbox"/> |
| A district/borough council | <input type="checkbox"/> | A borough councillor/MP | <input type="checkbox"/> |
| On behalf of an organisation | <input type="checkbox"/> | On behalf of a community group | <input type="checkbox"/> |
| A landowner/developer/agent/architect | <input checked="" type="checkbox"/> | Other | <input type="checkbox"/> |

PART B

PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

1. Which part of the Overton Neighbourhood Plan does your representation relate to?

- a. Paragraph b. Policy Fully outlined below Other Assessment of the SP site, outlined below

2. Do you support or oppose that part of the Overton Neighbourhood Plan?

- Support Oppose

Please provide comments on the part of the neighbourhood plan that you refer to in Q1.

Please remember that the examiner will test whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. Your representation(s) should therefore aim to address whether or not the neighbourhood plan meets the basic conditions.

- 1.0 These representations have been prepared by Lichfields on behalf of our client St Philips and the landowners working in conjunction, hereafter 'SP'. The representations relate to land West of Kingclere Road, hereafter 'the SP site', which is identified as site no. 'OVO01' within the Strategic Environmental Assessment (SEA, 2025) for the draft Overton Neighbourhood Development Plan.
- 1.1 These representations are submitted in respect to the draft Overton Neighbourhood Development Plan Regulation 16 consultation (dONDP16) and should be read in conjunction with earlier representations about the site to the regulation 14 consultation dated 11th March 2025 submitted on behalf of 'Freefolk Farms Partnership'.
- 1.2 Residential development of the site offers a number of key benefits including:
- 1 Making a valuable contribution towards meeting Overton's market and affordable housing need within a short development timeframe
 - 2 Providing a policy compliant level of affordable housing
 - 3 Strong pedestrian and cycle links to Overton Town Centre and Railway Station
 - 4 The opportunity to alleviate parking congestion at the nearby Overton Church of England Primary School
 - 5 The delivery of public open space to benefit new and existing residents

Scope of Representations

- 1.3 The current consultation requests comments on the dONDP16. These representations therefore address the following key areas:
- 1 Draft policy H1: The housing requirement and Settlement boundary (section 1)
 - 2 Draft policy H2: Land at Portals Mill (section 2)
 - 3 Assessments of the SP site (section 3)
 - 4 Draft policy LEB2 Important Views (Section 4)

1 Policy H1: The housing requirement and the Settlement boundary

- 1.4 The dONDP16 identifies an indicative housing requirement of 250 dwellings which it states was advised by Basingstoke and Deane Borough Council (BDBC) in their letter dated 3rd July 2025. The dONDP16 proposes to allocate Land at Portals Mill for inter alia 400 dwellings (via draft policy H2), whilst defining a settlement boundary for Overton through draft policy H1 to include the Portals Mill site.
- 1.5 Draft policy H1 seeks to limit the scope for further residential development outside of this new settlement boundary by stating “apart from the limited circumstances set out in paragraph 84 of the NPPF and policy SS6 of the adopted Local Plan 2011-2029 (or successor policy), new homes outside the settlement policy boundary will not be supported.” Our client considers the proposed approach of draft policy H1 does not reflect up to date evidence of housing need as required by national draft policy and would not achieve sustainable development.

Why the ONP does not reflect up to date housing evidence

- 1.6 The 250 dwelling housing requirements for Overton reflects the Settlement Study (2024) accompanying the Reg. 18 Local Plan consultation. The study acknowledged via para 5.2.5 that:
- “At the time this study was first prepared in 2021, the Government’s standard method indicated that Basingstoke and Deane would need to deliver approximately 900 dwellings per annum, which has been used as the housing figure for the purposes of this study (Lichfields emphasis). However, it is acknowledged that the Standard Method figure continues to change over time as new data is published”*
- 1.7 Since the 2024 Settlement Study, BDBC’s annual housing requirement calculated via the Standard Method (SM) has increased substantially to 1,127 homes (an increase of just over 25%). Going forwards, the emerging BDBC Local Plan will need to plan for the SM housing requirements to fulfil the requirements of NPPF (para. 62). This provides a very different basis for assessing settlements than the housing need which underpinned the Settlement Study 2024 and this is reflected in subsequent evidence preparation undertaken by BDBC¹. As a result the dONDP16’s housing requirement of 250 dwellings, which is derived from this study, can no longer be considered up to date.
- 1.8 The dONDP16 relies on the letter from BDBC to ‘Richard Oram’ dated 3rd July 2025 when setting its housing requirement. A key extract of this letter states:
- “At this stage, the LPA has not yet determined how this [SM housing required] will be met, and therefore the 2024 Regulation 18 Plan (and its evidence base) provides the most recently available planning strategy for the area. The LPA is due to consult upon a new Regulation 18 draft Local Plan in winter 2025/6, which will include a revised spatial strategy, but at this stage it is not possible to set out the details of any revisions.*
- It is therefore the LPA’s view that Overton’s current indicative housing requirement is a minimum of 250 dwellings. It is recognised that the ongoing Local Plan process provides some future uncertainty, so it is strongly advised that the parish council progresses the plan as quickly as possible.*
- It should be noted that even if the parish’s indicative housing requirement was to increase as a consequence of the Local Plan process progressing (prior to the neighbourhood plan being adopted), this would not be likely to affect whether the plan met the ‘basic conditions’ (BDBC¹, 3rd July 2025)*

¹ BDBC Report, Overton Neighbourhood development plan 2025-2040: Submission consultation, September 2025

- 1.9 The BDBC Reg. 18 Plan was never subject to scrutiny beyond consultation and the housing numbers on which key evidence documents were based (for example the settlement study), have since been superseded by higher SM requirements. Our client therefore considers the contended indicative housing requirement for Overton of a minimum of 250 dwellings (which the dONDP16 adopts a requirement, not a minimum within para dONDP16 para 41) is based on out of date evidence of housing need.
- 1.10 BDBC has subsequently confirmed this, clearly identifying a higher housing requirement for Overton stating in September 2025:
“the council has published, in draft form, a revised spatial strategy setting out proposals for how the borough would meet an increased housing requirement set by the 2024 NPPF. This was discussed at Economy and Infrastructure Committee in September 2025 and was supported by an updated draft Settlement Study which identified and evidenced housing requirements for the rural settlements. This identified an increased housing requirement of 410 dwellings for Overton”. (BDBC report, Overton Neighbourhood Development Plan 2025-2040: Submission Consultation, September 2025)
- 1.11 The ‘revised spatial strategy’ referred to in this letter has not been consulted on, and therefore cannot yet be seen as a definitive or robust housing requirement for Overton to fulfil the requirements of national policies (NPPF para 62). The housing requirement for Overton, stated to be the most sustainable locations for future growth after Basingstoke Town within the BDBC Settlement Study (2024), may yet increase as the emerging Local Plan progresses.
- 1.12 Notwithstanding this, it is the most recent position provided by BDBC, who clearly require it to supersede the 250 dwelling housing requirement contended by the dONDP16. Nowhere in the dONDP16 does it acknowledge or seek to meet the requirement for 410 dwellings. The dONDP16’s approach of proceeding on the basis of the housing requirement of 250 dwellings is contrary to the provisions of the PPG which states “to reduce the likelihood of a neighbourhood plan becoming out of date once a new local plan (or spatial development strategy) is adopted, communities preparing a neighbourhood plan should take account of latest and up-to-date evidence of housing need” (Paragraph: 084 Reference ID: 41-084-20190509).
- 1.13 The housing requirement used by the dONDP16 of 250 dwellings would not reflect up-to-date evidence and our client considers the plan would fail to contribute towards Sustainable development.
- 1.14 Specifically the PPG emphasises (Lichfields emphasis) that “Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development” (PPG, 009 Reference ID: 41-009-20190509).
- 1.15 Overton (along with Tadley and Whitchurch) is stated to be the most sustainable locations for future growth, after Basingstoke Town within the BDBC Settlement Study (2024). Draft Policy H1 and its settlement boundary, will limit growth in Overton, based on an out of date housing requirement. This would fail to meet the Basic Condition of contributing towards the achievement of sustainable development (set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004).
- 1.16 Furthermore the PPG makes clear that “Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:
- *the emerging neighbourhood plan*
 - *the emerging local plan (or spatial development strategy)*
 - *the adopted development plan”* (009 Reference ID: 41-009-20190509)

1.17 The discrepancy between the BDBC and the dONDP16 position on Overton’s housing requirement (410 dwellings, and 250 dwellings respectively), highlight a lack of agreement over the relationship between the emerging dONDP16 and the most up to date evidence base of the emerging BDBC Local Plan.

2 Draft policy H2: Land at Portals Mill

1.18 Draft policy H2 proposes to allocate Land at Portals Mill for approximately 400 homes, along with a number of other requirements including Employment (Classes E(g), B2 and B8) and retail (Class E) uses, Parking Facilities for the railway station, open space and 40% affordable housing.

1.19 The site is subject to a number of physical constraints including:

- Contaminated land – draft policy H2 (xix) highlights the need to remediate the land of any contamination before any part of the development is occupied
- Landscape impact - the site is located within the North Wessex Downs National Landscape where the NPPF requires ‘Great Weight’ to be given to conserving and enhancing landscape and scenic beauty (Para 189), a matter which has simply not been fully assessed at this stage. Additionally draft policy H2 (vii) requires retention of parts of the site as accessible natural green space to provide a suitable transition with adjoining agricultural land.
- Vehicular Access - Site access from the south is via a single track bridge under the railway . An additional access is proposed from the west off Kingsclere Road across arable land within the national landscape which is both untested in highway and visual impact terms

1.20 The dONDP16 is not accompanied by any evidence demonstrating that the requirements of draft policy H2 can be viably delivered, nor that the allocated quantum of residential development (400 dwellings) is deliverable given the sensitive nature of the site in the National Landscape, and its known physical constraints. There is insufficient evidence to demonstrate that ‘Great Weight’ has been given to conserving and enhancing landscape and scenic beauty of the site, when defining the quantum of proposed development.

1.21 We have previously noted BDBC’s statement that the housing requirement for Overton has increased to 410 dwellings (which may yet increase), which is far higher than the 250 dwelling requirement contended within the DONDP16. On this basis, the allocation via draft policy H2 will not be sufficient to meet Overton’s housing requirements, even if 400 dwellings could be delivered at the Portal’s Mill site, notwithstanding the absence of evidence showing this.

1.22 Indeed our client’s concern on this point reflects that of BDBC Officers (BDBC report, Overton Neighbourhood Development Plan 2025-2040: Submission Consultation, September 2025) that

“the LPA has some concerns about whether the identified capacity of 400 dwellings can be satisfactorily accommodated within the site given the increase in yield from the LPA’s Regulation 18 draft Local Plan site allocation in 2024 which proposed a capacity of approximately 340 dwellings (as did the earlier, pre-submission ONDP).”

1.23 Importantly BDBC go on to state that “justification for this increase in yield is needed to ensure that any development would be in keeping with the established character of Overton.” The plan is progressing to examination in the absence of any such justification

1.24 The SEA accompanying the dONDP16 is predicated on a housing requirement of 250 dwellings. This housing requirement has been superseded, and this has materially undermined the SEA. Notably, the SEA assessed 3 options, with options 1 and 2 comprising allocation of a combination of sites, whereas option 3 was “*delivery of housing through the Overton Mill site exclusively*” SEA (2025, page iv). Option 3 was chosen as the “*preferred option that would meet and exceed housing need in the area*”.

1.25 The SEA process should be undertaken again in light of an up to date housing requirement, now it is apparent the Mill site will not exclusively meet Overton’s housing requirement. Further sites will be required to meet Overton's housing requirements, and realise its Vision

that by 2040 “*New homes have helped address local need and sustain the demand for local facilities*” (dONDP16). Our client’s site could make a valuable contribution towards meeting housing need and sustainable development in Overton.

3 Assessment of the SP site

- 1.26 The SEA (2025) groups a series of sites as ‘reasonable alternatives’, with the SP site being assessed within Option 1 ‘Foxdown sites’ along with five other separate sites (sites OV001-5, and OV017 are grouped). These six sites have no definitive spatial interrelationship that mean they should collectively comprise, and be assessed as, a single reasonable alternative. The SP site is sufficiently distinct in that it can be independently developed without reliance on the other sites considered within Option 3.
- 1.27 The SEA’s approach of grouping sites, is contrary to the approach advised by the PPG which states “*Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.*” (Paragraph: 018 Reference ID: 11-018-20140306).
- 1.28 Our client’s site can be delivered independently to meet local housing need, and should be assessed as a single ‘Reasonable Alternative’ by an updated SEA, based on an up to date level of housing need.

4 Draft policy LEB2: Important Views

- 1.29 Draft policy LEB2 lists a number of ‘Important Views’ from ‘public vantage points’, and states that “*Development proposals which would have an adverse visual impact on an identified Important View will not be supported*” (dDONDP16, page 41). Views 2a and 2b are across the SP site in close proximity, whilst view 2d is from some distance. Photographs are included in Appendix C of the dONDP16 which purport to be from public vantage points in the identified view locations, and representative of the views.
- 1.30 In relation to view 2a, our client’s land includes a dense woodland fronting Court Drove. The photo taken included in appendix C of the dONDP16 to represent View 2a, appears to be taken from the inside (eastern) edge of that woodland, from our client’s private land, in south east direction. Whilst our client does not dispute that limited views over their land are available from Court Drove, the photo in appendix C misrepresents the view available from a public vantage point, which is the purpose of draft policy LEB2.
- 1.31 A photo of the view available from a public vantage point from Court Drove is appended (photo taken 9th October 2025). It shows the view available is heavily screened by the existing dense woodland and vegetation, and is much more restricted than that shown within appendix C. The view available from a public vantage point would not include many of the physical features and characteristics identified to be of value by appendix C. This misrepresentation undermines the value prescribed to view 2a by draft policy LEB2.
- 1.32 In relation to view 2d from Winchester Street towards the site, we note that the photo of the view provided in appendix C is not date stamped. We append a recent (photo taken 9th October 2025) of view 2d which by comparison shows the height and density of tree screening afford very limited views of the SP site, and St Mary’s Church (which is Grade II listed). Some seasonal variation in the nature of this view is to be expected (although not noted by draft policy LEB2), but it should be noted that the photo chosen in appendix 3 appears to be dated, and not fully representative of the current view available.

- 1.33 Our client also questions the evidential basis for the ‘Important Views’ identified. The dONDP16 states that “*the selection of Important Views has been informed by the questionnaire carried out in the summer of 2022...and has also drawn on earlier analysis in the Overton Village Design Statement*” (2002) (dONDP16, para 88). The dONDP16 does not identify any other sources of evidence for the Important Views. The Overton Village Design Statement (VDS, 2002) states that “*In order to be effective, a Village Design Statement must be produced by local residents and reflect local opinion*”. The VDS is now over 20 years old, and there is no evidence that it still reflects local opinion or indeed circumstances on the ground.
- 1.34 The other source of evidence to draft policy LEB2 is stated to be the questionnaires undertaken in 2022. The 2022 questionnaire referred to simply asked “*If there is a particular view or place that is special to you, tell us about it*” (Overton Neighbourhood Development Plan Consultation Statement – Appendix B). The results in appendix B do not clarify whether those voting were voting for a ‘place’ a ‘view’, and respondents were not asked to limit responses to views available from the public domain, which is the basis for draft policy LEB2 as confirmed by para 86 of the ONP25.
- 1.35 The subsequent analysis of responses to the Public Consultation in May 2023 provided in appendix C of the Overton Neighbourhood Development Plan Consultation Statement provides no further analysis of public responses on ‘Important Views’. It is therefore unclear how the specific ‘Important Views’ stated in draft policy LEB2 were determined based on the responses received.
- 1.36 The limitations of the landscape evidence supporting draft policy LEB2 are apparent in the supporting text to the draft policy. dONDP16, para 89 states that “there will be views that need to be protected that have not been identified by local people. These views will be the subject of assessment when planning applications are submitted by developers” (dONDP16, para 89). The potential absence of other views that may need protection highlight that subjectivity of the ‘Important Views’ identified by draft policy LEB2 and undermine the validity and effectiveness of draft policy LEB2 to achieve its intentions of retaining and enhancing visual amenity.

Summary

- 1.37 In summary, we identify the following concerns in relation the neighbourhood plan and its evidence base:
1. The dONP25 limits the scope of development, therefore failing to deliver sustainable development in Overton which BDBC consider is (along with Tadley and Whitchurch) the most sustainable location for future growth in BDBC after Basingstoke Town
 2. Failure to meet BDBC’s required housing requirement
 3. There is no evidence that draft policy H2 can deliver the 400 homes, a concern shared by BDBC
 4. Inappropriate assessment of our clients site, with the SEA failing to consider the SP site in isolation, contrary to the PPG
 5. Lack of robust and transparent evidence base to in determining ‘Important Views’ which could prejudice the delivery of sustainable development of the SP site

Please state any improvements or modifications that you feel should be made to the neighbourhood plan.

Please see the answer to question 2 above.

The majority of neighbourhood plan examinations are expected to be through written representations. However, should the examiner decide there is a need for a public hearing, please state below whether you would like to participate.

3. If a public hearing is necessary would you like to participate?

a. No, I do not wish to participate at the examination public hearing

b. Yes, I wish to participate at the examination public hearing

4. If a public hearing is required please outline why you consider that your participation is necessary. Please note the examiner will determine the most appropriate procedure.

We expect we would need to participate in the hearing to amplify the concerns raised in these representations, about the dOCP16 not meeting the basic conditions.

Continue on a separate sheet if necessary

Data Protection Statement

In complying with the General Data Protection Regulation (GDPR), Basingstoke and Deane Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to the Overton Neighbourhood Plan consultation on the council's website. This will include publication of names of respondents and company names (where appropriate). Please ensure you do not include any personal information in Part B of the document. Copies of all consultation responses, including redacted versions of Part A, will be available to view at the council offices, and photocopies can be made of these representations on request.

By submitting representations, your details will be added to the Basingstoke and Deane Planning Policy Consultation database, and you may be contacted at future stages of the Overton neighbourhood plan process. All personal data will be processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation ('GDPR').

Personal information will also be shared with the appointed examiner, who may wish to contact you to discuss your comments and concerns, prior to the examination of the neighbourhood plan.

Please indicate below if you wish to be kept informed of the progress of the Overton Neighbourhood Plan and if you are happy for us to contact you.

a. If you wish to be notified of the Examiner's Report please tick box

b. If you wish to be notified of the 'Made' Neighbourhood Plan please tick box

Basingstoke and Deane Borough Council is the data controller for the personal information you provide on this form. You can contact the council by phone on 01256 844844, via email to customer.service@basingstoke.gov.uk or by writing to us at Civic Offices, London Road, Basingstoke RG21 4AH. The council's Data Protection Officer can be contacted at dpo@basingstoke.gov.uk

We will process personal data provided on this form only for the purposes relating to this consultation. A summary of consultation responses may be reported to the relevant council Committee and published on the council's website.

As a public authority the council is subject to the provisions of the Freedom of Information Act (FOIA) and Environmental Information Regulations (EIR). This means we may be required to disclose information provided as part of this consultation if it is requested. Personal data will not be disclosed under FOIA or EIR.

- we will share your information with the appointed examiner for the purpose of examining the neighbourhood plan
- we will not disclose any information to other organisations unless we are required by law to do so
- your personal details will only be held as long as is needed for this consultation and in accordance with our retention policy

For further details on how your information is used; how we maintain the security of your information and your rights, including how to access information we hold on you and how to complain if you have any concerns about how your personal details are processed, please visit www.basingstoke.gov.uk or email dpo@basingstoke.gov.uk



Viewpoint 2d - Date: 09/10/2025



Viewpoint 2e - Date:
09-10-2025

Victoria Corrigan

From: Beata Ginn <[REDACTED]>
Sent: 08 October 2025 12:47
To: Local Plan
Cc: Planning SE; Patrick Blake; Spatial Planning; 'transportplanning@dft.gov.uk'
Subject: FORMAL RESPONSE@2025 10 08: (NH/25/12734) Notification of Publication of the Overton Neighbourhood Plan 2025-2040

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FAO: Planning Policy team

Our Reference: NH/25/12734

Re: Overton Neighbourhood Plan 2016 – 2029

Dear Sir or Madam

Thank you for your e-mail dated 4 September 2025 consulting us on the above consultation.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A303 and A34.

We have reviewed information available on your planning portal and have 'No Comments'.

Please continue to consult us on matters concerning planning via our team's inbox:

planingse@nationalhighways.co.uk

Regards

Mrs Beata Ginn

Assistant Spatial Planner (Area 3)

National Highways | Bridge House | Walnut Tree Close | Guildford GU1 4LZ
[REDACTED]

Web: <https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

Booked Leave:

15 October – 31 October 2025

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |
<https://nationalhighways.co.uk> | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.

Victoria Corrigan

From: Lever, Warren <[REDACTED]>
Sent: 16 October 2025 07:21
To: Local Plan
Cc: Public Health Hampshire; Planning Consultations; Fox, Charlotte
Subject: Notification of Publication of the Overton Neighbourhood Plan 2025-2040

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Response to the Overton Neighbourhood Plan Submission

Thank you for consulting Public Health on the submission version of the Overton Neighbourhood Plan. We appreciate the opportunity to review the updated document, accompanying documents and acknowledge the positive progress made since the Regulation 14 consultation.

Upon comparison with the previous draft, it is encouraging to see that several of the issues raised in our previous detailed response have been considered in this final version. This reflects a positive step towards embedding health and wellbeing considerations within the neighbourhood plan.

However, we would like to reiterate two key areas where we feel the plan could be further strengthened:

1. **Incorporation of the Joint Strategic Needs Assessment (JSNA):**

The JSNA provides valuable insight into the health and wellbeing needs of the local population. We strongly encourage the plan to reference relevant findings from the JSNA to ensure that local health priorities are reflected in the vision and policies of the Neighbourhood Plan.

2. **Alignment with Local Transport Plan 4 (LTP4) and Healthy Streets Guidance:**

The plan currently does not reference the helpful themes and priorities set out in Hampshire's Local Transport Plan 4 (LTP4), nor does it incorporate the principles of the Healthy Streets framework. Both documents offer important guidance on creating healthier, more sustainable, and people focused movement environments. Their inclusion would support the plan's ambitions around active travel, accessibility, connectivity, and community wellbeing. This point was also highlighted in previous responses from both Public Health and Transport Teams from Hampshire County Council.

We remain supportive of the Neighbourhood Plan and its potential to positively influence the health and wellbeing of the Overton community. We hope the above suggestions are helpful and would be happy to provide further input or clarification if needed.

Kindest regards

Warren Lever BSc (Hons), PG Dip UD, MRICS, IHBC
Principal Spatial Planner - Public Health
Hampshire County Council



Public Health, Adults' Health and Care
Hampshire County Council,
Elizabeth II Court, Winchester, SO23 8UJ

Email: [REDACTED]

Please note I do not work Fridays.

Victoria Corrigan

From: [REDACTED]
Sent: 15 October 2025 18:53
To: Local Plan
Subject: Overton Neighbourhood plan
Attachments: Overton Mill Dev sf 251015.docx

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Dear Sir

Please find attached a note on our comments on the Neighbourhood Plan for Overton. This note is supported by Stephen Foot, Grace Foot and Hilary Westwater of Quidhampton Farmhouse, Station Rd, Overton. Contact telephone number is on the letterhead and Stephen's mobile is [REDACTED].

Kind regards

Stephen



Introduction

For the last 100 years, the Portals papermill has been a defining feature of our village. It has provided employment, training and development opportunities, housing, recreational facilities and many of the farms and shops that we rely on. With its closure a new era will begin and we are eager to ensure that the new beginning builds on the best that the Mill provided for the community it operated in.

We are fully supportive of the plan to develop the Mill site into housing that can meet the village need and also targets set for Overton by the Borough Council and others. We believe that the Mill site can deliver all of those needs, without developing on the green field sites within the village boundary. The Neighbourhood Plan has fully captured the spirit in the village when it emphasises that the whole community want to protect the green fields that define this part of N Hampshire at all costs. With this development at the Mill, there is no need to destroy the rural look and feel of Overton and speculative development is completely unnecessary and must be avoided.

The purpose of this paper is to support the Overton Parish Council and the development of the Neighbourhood Plan, make some key recommendations on where that can be enhanced to ensure support from the community and to ensure that our recommendations are considered as part of the reg 18 Basingstoke and Deane Borough Council Local Plan.

There are five areas where the Neighbourhood Plan either does not go far enough or is not clear enough – leaving ambiguity that will no doubt be interpreted by any prospective developer in a way that best suits their aspirations. These are set out below:

1. Executive Summary
2. Pace
3. Site Access
4. Traffic flows around, and in and out of, the village
5. Integration with the village centre.

Executive Summary

We believe that the Neighbourhood Plan has been carefully and considerably compiled and will gain significant support from the community. We believe that it would benefit from having an Executive Summary that sets out in a couple of pages the clear messages contained within it. This Executive Summary could then be used by the Council Planning Committee, its officers and Developers alike to ensure alignment with community needs.

Pace

We believe that the Neighbourhood Plan should stress the desire to implement the proposed development at the Portals Mill site as soon as practically possible. We believe that this site provides the best opportunity to enhance our village. Delivering it at pace will also protect the Green Field sites around the village, which, if developed, would destroy so much that so many in Overton care about. The implications of moving at pace is that all parties will need to work together to agree on the proposed solution and to resolve outstanding issues. The first of these issues is site access (see below) and we are confident that the community will be prepared to work with Basingstoke Council, Hampshire Council and the Developer to resolve them. A clear and concise Executive Summary will act as the blueprint for all these discussions.

Site Access

The Neighbourhood Plan states that “that part of the site that lies to the north of the railway line and the residential part of the site to the south of the railway line will be accessed via Papermill Lane and Kingsclere Road. The employment, retail and parking facilities to the south will be accessed from Station Hill/Approach”.

We do not believe that this will work and this view seems to be reflected by the proposed developer who are planning to access the construction site by a new entrance directly onto the Kingsclere Road to the north of the railway line.

The proposal included in the Neighbourhood Plan is not clear how traffic will get from Papermill Lane to Kingsclere Road. There are two options available. One would be access via Station Hill/Approach and the other would be via Station Road and through the centre of the village.

Accessing Kingsclere Road via Station Road/ Approach would require adoption of both of those roads and addressing a dangerous, blind, junction onto the Kingsclere Road. Accessing via Station Road and the village centre will cause have significant adverse affects on the blind corner where Station Road meets

Station Approach and where Station Road narrows outside the Old House at Home pub. It is self-evident that no assessment of traffic flows has been considered – particularly to take account the weekly bin lorries use of the road on a Tuesday morning. When the lorries pass down Station Road, no traffic can get past them. Whilst this is manageable in a quiet lane with little traffic it will be untenable with an additional 400 dwellings and only this road as an access.

To avoid the inevitable congestion at the junction of Station Road and London Road, traffic will inevitably attempt to use either the narrow country lanes through Nutley Bottom or the cut through up Straight Lane. None of these routes can handle any increase in traffic and are wholly unsuitable on a long term basis for an additional 400 homes.

Comparing expected future traffic flows with those experienced when the Mill was operating at full capacity ignores four significant factors that have changed:

1. Traffic to the Mill tended to be heavy on the change of shift – which was early in the morning and late in the evening. Future traffic flows are not going to be so predictable with peaks with children being taken to school in the morning and commuting trips;
2. Lorry traffic to the Mill was generally outside normal working hours. This is evidenced by the fact that lorries tended to park on Papermakers Lane or on the hard standing that is part of Quidhampton Farmhouse and wait until 0600 when they could enter the Mill Site;
3. When Portals was operating at full capacity, the Mill laid on buses to take employees into work. This significantly reduced the amount of “commuter” traffic; and
4. Much of the future traffic from the homes to be built will be to take children to and from school and, hopefully, to the shops in the village centre. It is not realistic to assume that these people will drive. The impact is that the majority of traffic generated by the new development will be circular and within the boundary of the village by its nature. It will not be dispersed far and wide as the commuter traffic to the working mill was.

The solution to this potential quandary is quite simple and has already been identified by the proposed developer. They have, rightly, recognised that they will have to take construction traffic to and from the site via a new access point directly onto the Kingsclere Road to the north of the Railway line. By establishing this as a precedent, they are seeking to establish that the environmental impact of building a new road access through the Area of Outstanding National Beauty is a justified consequence of the new development and one that is necessary to enable the development. This refers to the incursion into the Site of Importance

for Nature Conservation (SINC) at the western boundary of the proposed site on the north side of the railway line. The Neighbourhood Plan should establish that this new access should be the main access for the new site once it has been constructed.

Traffic flows around the village

With up to an additional 400 homes to be built on the Overton Mill site, there will be considerable extra traffic generated much of which will be very locally based. As noted above, it is unrealistic to expect households in the new development to either walk to the school or to the shops in the village. Given that the development needs to encourage use of these local facilities, it needs to understand the implications and implement plans for its mitigation.

This will require the following that should all be integrated into the Neighbourhood Plan and not left as “additional tasks that should be assessed”:

1. Improved parking facilities within the village;
2. Improved parking at the railway station so that cars are not parked on Station Approach;
3. Traffic Management on the Kingsclere Road – both over the railway bridge and the junction with Hill Top Road and at the junction of Station Road and London Road; and
4. Improved parking and drop off facilities at the school.

Integration of the new development into Overton Village

We believe that, done well, a new development at Overton Mill will greatly enhance the village and bring new much needed homes to sustain our growing community. Getting the balance right will be a challenge and the Neighbourhood Plan needs to be more explicit about what it is seeking to achieve. The outcome that we would all want to avoid would be to see the new development becoming a “dormitory” for people whose lives are largely outside Overton and where people do not feel they belong or contribute to the village community.

Part of this can be addressed by ensuring that there are sufficient reasons for the young to stay in the neighbourhood following school and could and would be satisfied by including further education facilities within the new development – possibly as part of the expected employment opportunities included in the plan.

Other aspects can be realised by encouraging the new residents to use the facilities in the village and this will require improvements to traffic flows and parking in the village as well as enhancements to the cycle tracks and footpaths. At the moment there are tracks from the station into the village onto Kingsclere

Road – via Flashetts, Copse Road/ Foxdown or along Hill Top Road. The plan needs to be explicit about how these will be enhanced with the specific aim of ensuring full integration of the new site with the heart of the village.

Conclusion

In concluding we wish to note:

1. Our recognition of the extensive work that has been carried out by the team in producing the Neighbourhood Plan;
2. Our support for the broad thrust of the development of Overton Mill to meet the housing needs of the village;
3. Our wholehearted support to OPC for their outright rejection of developing on any of the green field sites around the village whilst a single brown field site exists that would satisfy all our needs;
4. Our desire to clarify specific aspects of the Plan as detailed in this note;
5. Our desire to expedite the development of the Portals Mill site in order to protect other Green Field sites in the village; and
6. The Neighbourhood Plan targets a total of 400 new homes on the site and a maximum height of the development, whereas the BDBC figure used as a baseline (letter dated 3 July 2025) says that a figure of 250 homes should be used as a baseline. We have not seen any justification for this increase.

Stephen Foot
Grace Foot
Hilary Westwater

Victoria Corrigan

From: Steve Williams <[REDACTED]>
Sent: 15 October 2025 16:48
To: Local Plan
Subject: Comments on Overton Neighbourhood Plan (ONP)

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Introduction

These comments are our own but have been shaped over recent weeks by face to face discussion with concerned individuals living in different parts of the village.

We should first make clear that we fully support the draft ONP which has been carefully developed through a well set out consultation process .The Parish Council and the lead author have done a very good job.Our interest is to ensure the right emphasis and understanding is given to the final document . In particular, we wish to stress the vital importance of a second access to the developed Mill site from Kingsclere Road (B3051).

Value of Executive Summary

We believe that complying with the detailed requirements of Neighbourhood planning can lead to some points and priorities being underestimated or lost We suggest a succinct Executive Summary would guard against that possibility.

Need to move with urgency and speed

In making additional points we stress the need for efforts of all concerned to work in partnership (this applies to the developer too)to move with pace to get the plan in place and to develop the brownfield site at Overton Mill .This means early engagement and action on traffic flows and safety by Hampshire Highways /HCC. Slow progress and delay is likely to result in unnecessary housing development unwanted by local people on green field sites where construction costs can be cheaper than Brown field even if achieved through the appeals process.This outcome would make a mockery of the Neighbour Planning process and democratic consideration .

Ensuring transport infrastructure meets the needs of such a large construction

400 dwellings is a major initiative with a massive impact . - it must be done well. It adds some 20% to the existing number of housing units in the village and a similar increase in population growth . It needs the right traffic , transport and pedestrian/cycle provision to make it work . It seems that the current developer interest has no serious plans to amend access and route pathways, relying solely on Station Road / Papermakers Lane .

The ONP correctly outlines the need for integration of the housing at the Mill site some distance away with the centre of the village , it's shops ,retail units , businesses , hospitality venues and meeting halls / places and particularly the Primary School. What may not be understood by those not familiar with the village and those doing a desk study is how a second access to the redeveloped site is

essential to create an integrated community.. Without easy and the direct access through connection via Kingsclere Road to the village 'services' , the risk is the development at the Mill at a distance ensures a discordant ,incongruous and isolated satellite estate to the detriment of the current village and the new dwellings. Station Road alone is not suitable to be a sole access with a large flow of vehicles across the day : residents'cars and delivery vehicles. Station Road has a number of pinch points and bends revealing what it is a road that becomes country lane with connections to other rural lanes. But spreading and sharing the transport burden across two access points can provide a smooth and safe way forward.

While it is recognised that Station Road served access in the past to the Mill , deliveries were managed to lessen impact and worker access was also mitigated by the shift system once employee numbers and collective transport dropped. Once 400 dwellings are built, traffic will be heavy throughout the day and particularly large through school start and finish times. Access via Kingsclere Road would provide a direct journey to the village and especially the school. Leaving Station Road as the sole access point would see heavy traffic to the village centre and the school turning dangerously right across and onto the B3400. Another flaw of reliance on Station Road solely would see traffic from the Mill site turning right into Station Approach / Station Hill and then dangerously right onto the B3051 to get to Newbury , Reading Aldermaston / Tadley - potentially employment areas.

Further points in support of access via Kingsclere Road

The existing bridge on Kingsclere Road over the railway line is already a serious safety concern It is narrow and has blind approaches in each direction and a dangerous junction with traffic from Station Hill. It should be seen already as priority area for improvement as traffic levels increase. At the same time it is understood that developer thinking is to direct demolition and construction traffic via a temporary access via Kingsclere Road near the bridge This precedent shows the weakness of a Station Road only access and helps make a case for a safe and permanent access via the Kingsclere Road.

It would be possible to develop an imaginative access point with traffic controls securing safe vehicle movements and provision for cyclists and pedestrians . We feel this is achievable within landscaped small margins of the North Wessex Downs area. After all the safety and smooth transport solutions would be combined with the disappearance of the blot of Mill itself on the vision. A welcome improvement for the valued area.

Final points

Two final points . First on village integration. Additional parking facilities and policies will be needed in the village centre to accommodate growth since car travel to the village centre will be a main means of transport.

Secondly , the need for urgent transport planning and measures is vital , having regard to significant growth and the potential impact on the narrow rural lanes and the Station Hill / Station Approach area , not currently maintained.

Steve and Denise Williams



Victoria Corrigan

From: South East ePlanning <e-seast@HistoricEngland.org.uk>
Sent: 20 October 2025 14:30
To: Local Plan
Subject: RE: Notification of Publication of the Overton Neighbourhood Plan 2025-2040
Attachments: Overton Reg 16 Letter.pdf; 2024 Overton Reg 14 (G.DA) .pdf

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Dear Planning Policy Team,

Thank you for consulting Historic England on the Overton Neighbourhood Plan (Regulation 16). Please find attached our response. Please accept my apologies for the late submission.

Kind Regards,

Hanna Simmonds
Business Officer

London and South East Region

Historic England | 4th Floor | Cannon Bridge House | 25 Dowgate Hill | London | EC4R 2YA

Please note my usual working days are Monday, Tuesday, Thursday and Friday



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From: Local Plan <Local.plan@basingstoke.gov.uk>

Sent: 04 September 2025 09:55

To: Local Plan <Local.plan@basingstoke.gov.uk>

Subject: Notification of Publication of the Overton Neighbourhood Plan 2025-2040

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Notification of Publication of the Overton Neighbourhood Plan 2025-2040 (Regulation 16)

Basingstoke and Deane Borough Council is now in receipt of the submission version of the Overton Neighbourhood Plan (NP) along with all accompanying documentation required under the Regulations. The Submission Overton NP sets out a vision for the neighbourhood area and planning policies which will be used to determine planning applications locally and guide development in the neighbourhood area up until 2040. The Submission Overton NP is subject to formal public consultation until **5pm on Thursday 16 October 2025**.

What does the Overton Neighbourhood Plan consist of and where can it be viewed?

The Submission Overton NP consists of the following:

- Overton Neighbourhood Plan
 - Appendix A – Design Guidance and Codes
 - Appendix B – Indicative Housing Requirement
 - Appendix C – Important Views
- Changes to Settlement Policy Boundary
- Discussion of the exclusion of Court Drove sites
- Modification Proposal Statement
- Policy Map Booklet
- Consultation Statement
- Basic Conditions Statement
- Equalities Impact Assessment
- SEA Environmental Report
- HRA Report
- SEA & HRA Screening Report
- SEA Decision Notice

These submission documents are available to view on the council's website at <http://www.basingstoke.gov.uk/ONP> .

These submission documents, along with a guidance note, are also available for public inspection at:

- **Basingstoke and Deane Borough Council Offices** (Mondays to Friday 8:30am - 4.30pm);
- **Basingstoke Discovery Centre** (8:30am - 6:30pm on Mondays to Fridays, and 8:30am - 4:30pm on Saturdays);
- **Overton Library** (9:30am-1:30pm on Tuesdays, Wednesdays and Saturdays and 1pm-5pm on Thursdays);
- **Whitchurch Library** (1pm-5pm Monday and Wednesdays and 9:30am and 1:30pm on Fridays and Saturdays);
- **Overton Parish Council Office** (9:30- 1:30pm Wednesdays)
- **The Red Lion Pub**, 37 High Steet Overton, RG25 3HQ
- Through contacting Richard Oram from the **Parish Council** via email richard.oram@overtonparishcouncil.gov.uk or phone 07983 992600.

How can you make your representations?

Representations in relation to the Overton NP and supporting documents should be submitted to the borough council using one of the following methods:

- online response form via the [councils consultation portal](#).
- return representation form or submit written comments by post to: Planning Policy Team, Basingstoke and Deane Borough Council, Civic Offices, London Road, Basingstoke RG21 4AH
- return representation form or submit written comments by email to: local.plan@basingstoke.gov.uk

Only those representations that are made in writing and that are received by the council within the consultation period (**5pm on Thursday 16 October 2025**) will be considered. All responses will then be forwarded to the plan's examiner once he/she is appointed.

When making your representation, please can you indicate whether you wish to participate in an Examination Public Hearing (should the examiner decide there is a need for one) and also whether you wish to be notified about the Examiner's Report and the 'Made' Overton NP.

If you require further information, or advice on how to respond to this consultation please contact Basingstoke and Deane Borough Council's Planning Policy Team by telephoning 01256 844844 or by emailing the team at local.plan@basingstoke.gov.uk .

You are receiving this email as you are registered on the council's planning policy mailing list or are a statutory consultee. If you wish to amend your details or remove your details from the database, please contact local.plan@basingstoke.gov.uk .

Kind regards,

Planning Policy Team

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Historic England

Planning Policy Team

Our Ref: PL00798069

Basingstoke and Deane
Borough Council

Direct Dial [REDACTED]

Date: 20 October 2025

by email only to
local.plan@basingstoke.gov.uk

Dear Planning Policy Team,

Ref: Overton Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

We would be grateful if you would notify us on e-seast@HistoricEngland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Louise Dandy
Historic Places Advisor
E-mail: [REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

[REDACTED]
HistoricEngland.org.uk





Historic England

By e-mail to: ndp@overtonparishcouncil.gov.uk

Our ref:
PL00798097
Your ref:
Date: 20/10/2025

Direct Dial:
Mobile: [REDACTED]

Draft Neighbourhood Plan for Overton

Thank you for consulting Historic England about your Regulation 14 draft Neighbourhood Plan. This is the first opportunity Historic England has had to review your neighbourhood plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers – be they interested members of the public, planners or developers – regarding how the place should develop over the course of the plan period.

We welcome the production of this neighbourhood plan and are pleased to see that the historic environment of your parish features throughout this draft.

Although your neighbourhood area does contain a number of designated heritage assets, at this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area. We offer one comment.



Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



When responding to Basingstoke and Deane Borough Council on its Regulation 18 local plan consultation, we asked the question what contribution does the mill (Land at Portals Mill) make to local character and sense of place? We encouraged the Council to consider this further in its assessments, drawing as appropriate from the Overton conservation area appraisal and other sources as appropriate. We pose the same question regarding this neighbourhood plan. If the neighbourhood plan is to add detail beyond what is in the emerging local plan about development in this location, how might this be informed by the heritage associated with the mill?

Also, some general advice and guidance below, which may be of assistance. The conservation officer at your local Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets.

Paragraph 190 of the National Planning Policy Framework (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.

The government's [National Planning Practice Guidance](#) on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a *neighbourhood* scale. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g.



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historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

The plan could also include consideration of any Grade II listed buildings or locally designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/>

If you have not already done so, we would recommend that you speak to the staff at local authority archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also non designated locally important buildings, archaeological remains and landscapes. Some Historic Environment Records may be available to view on-line via the Heritage Gateway (www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as a local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan, particularly in the early evidence gathering stages.

Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan, including the provision of appropriate maps, data, and supporting documentation. There are also funding opportunities available from Locality that could allow the community to hire appropriate expertise to assist in such an undertaking. This could involve hiring a consultant to help in the production of the plan itself, or to undertake work that could form the evidence base for the plan. More information on this can be found on the My Community website here: <http://mycommunity.org.uk/funding-options/neighbourhood-planning/>.

The Conservation Area may have an appraisal document that would ordinarily set out what the character and appearance of the area is that should be preserved or enhanced. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the



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positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up-to-date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan. Historic England's guidance notes for this process can be found here: [HE Advice Note 1 - conservation area designation, appraisal and management](#), and here: <https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/>. The funding opportunities available from Locality discussed above could also assist with having this work undertaken.

The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area, in this case the Parish of Capel. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place and respond to local character and history by reflecting the local identity of the place – for instance through the use of appropriate materials, and attractive design.

Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here:

<https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces>.

You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/>.

Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and



on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here:

<https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/>

If you are concerned about the impact of high levels of traffic through your area, particularly in rural areas, the “Traffic in Villages” toolkit developed by Hamilton - Baillie Associates in conjunction with Dorset AONB Partnership may be a useful resource to you.

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>

The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:

HE Advice Note 2 - making changes to heritage assets:

<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>



HE Good Practice Advice in Planning 3 - the setting of heritage assets:
<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:

HE Advice Note 3 - site allocations in local plans:
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans>

HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.

Finally, we should like to stress that this advice is based on the information provided by West Saltdean Neighbourhood Forum I in their correspondence. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

Louise

[REDACTED]

Historic Places Advisor,



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
HistoricEngland.org.uk

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Correspondence or information which you send us may therefore become publicly available.



Victoria Corrigan

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 16 October 2025 07:07
To: Local Plan
Subject: Consultations Response - Overton Neighbourhood Plan - Regulation 16 Consultation
Attachments: Annexe A - Neighbourhood Plan.pdf; 526090 NE Response.pdf

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Please find Natural England's response in relation to the above-mentioned consultation attached.

Kind regards,

Sally Wintle

Officer
Natural England
County Hall
Spetchley Road
Worcester
WR5 2NP

mail to: consultations@naturalengland.org.uk
www.gov.uk/natural-england



Thriving Nature
for people and planet

We strongly recommend using the **SSSI Impact Risk Zones** (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the **Discretionary Advice Service**, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the **Pre-submission Screening Service** for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)
For further information on the Pre-submission Screening Service see [here](#)

From: Local Plan <Local.plan@basingstoke.gov.uk>

Sent: 04 September 2025 09:55

To: Local Plan <Local.plan@basingstoke.gov.uk>

Subject: Notification of Publication of the Overton Neighbourhood Plan 2025-2040

Notification of Publication of the Overton Neighbourhood Plan 2025-2040 (Regulation 16)

Basingstoke and Deane Borough Council is now in receipt of the submission version of the Overton Neighbourhood Plan (NP) along with all accompanying documentation required under the Regulations. The Submission Overton NP sets out a vision for the neighbourhood area and planning policies which will be used to determine planning applications locally and guide development in the neighbourhood area up until 2040. The Submission Overton NP is subject to formal public consultation until **5pm on Thursday 16 October 2025**.

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- **Whitchurch Library** (1pm-5pm Monday and Wednesdays and 9:30am and 1:30pm on Fridays and Saturdays);
- **Overton Parish Council Office** (9:30- 1:30pm Wednesdays)
- **The Red Lion Pub**, 37 High Steet Overton, RG25 3HQ
- Through contacting Richard Oram from the **Parish Council** via email richard.oram@overtonparishcouncil.gov.uk or phone 07983 992600.

How can you make your representations?

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- online response form via the [councils consultation portal](#).

- return representation form or submit written comments by post to: Planning Policy Team, Basingstoke and Deane Borough Council, Civic Offices, London Road, Basingstoke RG21 4AH
- return representation form or submit written comments by email to:
local.plan@basingstoke.gov.uk

Only those representations that are made in writing and that are received by the council within the consultation period (**5pm on Thursday 16 October 2025**) will be considered. All responses will then be forwarded to the plan's examiner once he/she is appointed.

When making your representation, please can you indicate whether you wish to participate in an Examination Public Hearing (should the examiner decide there is a need for one) and also whether you wish to be notified about the Examiner's Report and the 'Made' Overton NP.

If you require further information, or advice on how to respond to this consultation please contact Basingstoke and Deane Borough Council's Planning Policy Team by telephoning 01256 844844 or by emailing the team at local.plan@basingstoke.gov.uk .

You are receiving this email as you are registered on the council's planning policy mailing list or are a statutory consultee. If you wish to amend your details or remove your details from the database, please contact local.plan@basingstoke.gov.uk .

Kind regards,

Planning Policy Team

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Date: 16 October 2025
Our ref: 526090
Your ref: Overton Neighbourhood Plan



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

Planning Policy Team
Basingstoke & Deane Borough Council

BY EMAIL ONLY

local.plan@basingstoke.gov.uk

Dear Sir/Madam

Overton Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 4 September 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Further information on when to consult Natural England on planning proposals is here- [Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/planning-and-transport-authorities-get-environmental-advice-on-planning)

Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.

Natural England advises Local Planning Authorities to use the following tools to assess the impacts of the proposal on the natural environment:

Impact Risk Zones:

Natural England has provided Local Planning Authorities (LPAs) with Impact Risk Zones (IRZs) which can be used to determine whether the proposal impacts statutory nature conservation sites. Natural England recommends that the LPA uses these IRZs to assess potential impacts. If proposals do not trigger an Impact Risk Zone then Natural England will provide an auto-response email.

Standing Advice:

Natural England has published Standing Advice. Links to standing advice are in Annex A

If after using these tools, you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require Natural England's advice.

Further information on LPA duties relating to protected sites and areas is here- [Protected sites and areas: how to review planning applications - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/protected-sites-and-areas-how-to-review-planning-applications)

Further guidance is also set out in Planning Practice Guidance on the natural environment [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/natural-environment) and on Habitats Regulations Assessment [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-regulations-assessment)

Non detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.

Should the proposal change, please consult us again.

Yours faithfully

Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Victoria Corrigan

From: Policy, Planning <Planning.Policy@southernwater.co.uk>
Sent: 19 September 2025 09:37
To: Local Plan
Cc: ndp@overtonparishcouncil.gov.uk
Subject: Southern Water Response - Overton Neighbourhood Development Plan - Regulation 16 Consultation
Attachments: 250919 Southern Water Response - Overton Neighbourhood Plan - Reg 16 Consultation.pdf

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Dear Sir / Madam

Thank you for consulting Southern Water on the submission version of the Overton Neighbourhood Development Plan.

Southern Water is the Statutory Wastewater and Water Service Provider for Overton.

Please find attached our comments in respect of the Plan.

We hope that you find our response useful and look forward to being kept informed of progress.

Kind Regards,
Ryan

Ryan Lownds
Strategic Planning Lead
Hampshire, West Sussex & Isle of Wight



M. [REDACTED]
www.southernwater.co.uk

From: Overton Neighbourhood Plan <[REDACTED]>
Sent: 04 September 2025 14:39
To: Richard Oram <[REDACTED]>; Anne Phillips <[REDACTED]>; Diane Jackson <[REDACTED]>
Subject: Re: Overton Neighbourhood Development Plan - Regulation 16 Consultation

You don't often get email from ndp@overtonparishcouncil.gov.uk. [Learn why this is important](#)

Notification of Publication of the Overton Neighbourhood Plan 2025-2040 (Regulation 16)

Basingstoke and Deane Borough Council is now in receipt of the submission version of the Overton Neighbourhood Plan (NP) along with all accompanying documentation required under the Regulations. The Submission Overton NP sets out a vision for the neighbourhood area and planning policies which will be used to determine planning applications locally and guide development in the neighbourhood area up until 2040. The Submission Overton NP is subject to formal public consultation until **5pm on Thursday 16 October 2025**.

What does the Overton Neighbourhood Plan consist of and where can it be viewed?

The Submission Overton NP consists of the following:

- Overton Neighbourhood Plan
 - Appendix A – Design Guidance and Codes
 - Appendix B – Indicative Housing Requirement
 - Appendix C – Important Views
- Changes to Settlement Policy Boundary
- Discussion of the exclusion of Court Drove sites
- Modification Proposal Statement
- Policy Map Booklet
- Consultation Statement
- Basic Conditions Statement
- Equalities Impact Assessment
- SEA Environmental Report
- HRA Report
- SEA & HRA Screening Report
- SEA Decision Notice

These submission documents are available to view on the council's website at <http://www.basingstoke.gov.uk/ONP>.

These submission documents, along with a guidance note, are also available for public inspection at:

- **Basingstoke and Deane Borough Council Offices** (Mondays to Friday 8:30am - 4.30pm);
- **Basingstoke Discovery Centre** (9:30am - 5pm on Mondays to Saturday, except for Tuesday which is 9:30am - 1:30pm)
- **Overton Library** (9:30am-1:30pm on Tuesdays, Wednesdays and Saturdays and 1pm-5pm on Thursdays)
- **Whitchurch Library** (1pm-5pm Monday and Wednesdays and 9:30am and 1:30pm on Fridays and Saturdays)
- **Overton Parish Council Office** (9:30- 1:30pm Wednesdays)
- **The Red Lion Pub**, 37 High Steet Overton, RG25 3HQ
- By contacting Richard Oram from the **Parish Council** via email richard.oram@overtonparishcouncil.gov.uk or phone 07983 992600.

How can you make your representations?

Representations in relation to the Overton NP and supporting documents should be submitted to the borough council using one of the following methods:

- online response form via the [council's consultation portal](#).
- return representation form or submit written comments by post to: Planning Policy Team, Basingstoke and Deane Borough Council, Civic Offices, London Road, Basingstoke RG21 4AH
- return representation form or submit written comments by email to: local.plan@basingstoke.gov.uk

Only those representations that are made in writing and that are received by the council within the consultation period (5pm on Thursday 16 October 2025) will be considered. All responses will then be forwarded to the plan's examiner once they are appointed.

When making your representation, please can you indicate whether you wish to participate in an Examination Public Hearing (should the examiner decide there is a need for one) and also whether you wish to be notified about the Examiner's Report and the 'Made' Overton NP.

If you require further information, or advice on how to respond to this consultation please contact Basingstoke and Deane Borough Council's Planning Policy Team by telephoning 01256 844844 or by emailing the team at local.plan@basingstoke.gov.uk.

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Planning Policy Team

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Basingstoke and Deane Borough Council

By Email Only - local.plan@basingstoke.gov.uk

Date
19 September 2025

Contact
planning.policy@southernwater.co.uk

Dear Sir/Madam,

Thank you for consulting Southern Water on the submission version of the Overton Neighbourhood Development Plan.

Southern Water is the Statutory Wastewater and Water Service Provider for Overton.

Please find further below our comments in respect of the Plan.

We hope that you find our response useful and look forward to being kept informed of progress.

Yours sincerely,

Ryan Lownds
Strategic Planning Lead
Hampshire, West Sussex & Isle of Wight



Southern Water Consultation Response Overton Neighbourhood Development Plan Submission (Reg 16)

Southern Water is the Statutory Wastewater and Water Service Provider for Overton.

Thank you to Overton Parish Council for including the recommendations we made in our pre submission consultation response, we welcome the support for those policy requirements.

Further Recommendations

Infrastructure Delivery

We could find no policies in the Plan to provide for new or improved water or wastewater infrastructure to support development, should that infrastructure be required at a future date.

The National Planning Policy Framework (NPPF) outlines the importance of achieving sustainable development and paragraph Paragraph 20 states '*Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision forb) **infrastructure** for transport, telecommunications, security, waste management, **water supply, wastewater**, flood risk and coastal change management, and the provision of minerals and energy (including heat);'*

Also, the National Planning Practice Guidance states that '*Adequate water and wastewater infrastructure is needed to support sustainable development*'.

Recommendation

Therefore, we would welcome the inclusion of the following wording in the Plan in relation to utility infrastructure provisions.

Proposals for new and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community.

Policy H5: The Overton Design Code

BF 08 - EXTENSIONS

We would welcome design guidance that ensures that rainwater drainage on Extensions is not permitted to discharge to foul or combined sewers.

We have had a number of instances where rainwater drainage for new Extensions has been connected to the foul sewer serving the property, which then drains to the main public foul sewer. This has often been done despite an inspection by Building Control as the lead authority.



A discharge of rainwater into our 'foul only' or combined sewer network, either directly or indirectly via a drainage lateral at the property, is detrimental to our sewerage network and can be harmful to the environment. This includes where the surface water hierarchy has been followed and all alternative options have been exhausted.

Recommendation

Therefore, we would welcome additional guidance in the Design Code for Extensions that ensures that rainwater is not permitted to be discharged into a foul only or combined sewer.

To minimise the risk of sewer flooding and protect water quality, rainwater drainage for the Extension will not be permitted to discharge to the foul or combined sewer network.

The above is supported by our surface water management policy, which is available to [view on our website](#).

It is also supported by the [National standards for sustainable drainage systems \(SuDS\) - GOV.UK](#) which states the following in **Standard 1: Run Off Destinations**.

Note 2: for the purposes of this standard, a combined sewer is a sewer intended to receive both foul sewage and surface runoff and does not include a sewer intended to receive only foul sewage, even if it has the capacity to accommodate additional flows or has an element of surface water in it already.

As stated on our website [Building Over a Sewer - Southern Water](#) if a developer is planning to build an Extension within three metres of a public sewer, they will need to submit a Build Over Application to Southern Water for approval, this is a mandatory requirement.

If not considered, building an Extension near a sewer could cause it to collapse under the weight of the new structure. This could also damage the property, interrupt drainage for other properties, and increase the likelihood of sewer flooding. Submitting a Build Over Application allows us to check the necessary precautions are in place and that the sewer is in good structural condition.

We'll also check that the design plans allow for 24-hour access to the sewer and any manholes. We need this to be able to carry out routine inspections, maintenance, and repairs. These are essential to help us protect the home and our pipes.

Recommendation

Therefore, we would welcome the following additional guidance in the Design Code for Extensions.

If the Extension is within three metres of a public sewer, a developer will need to submit a Build Over Application to Southern Water for approval, this is a mandatory requirement and ensures that the necessary precautions are in place to protect access to the sewer and its operation

7.5 Policy LEB5: Green and Blue Infrastructure

The National Planning Policy Framework (NPPF) (2024) establishes in Paragraph 108 that Local Green Space policies should be consistent with those for Green Belts, and Paragraph 153 sets the intention of ruling out inappropriate development '*except in very special circumstances*', with Paragraph 154 (H ii) stating that *Engineering Operations* are a permissible exception.

Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential water and wastewater infrastructure required to serve new and existing customers. This is because there are limited options available with regard to location, as the infrastructure would need to connect into existing networks.

The National Planning Practice Guidance recognises this scenario and states that '*it will be important to recognise that water and wastewater infrastructure sometimes has needs particular to the location (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered*'.

Recommendation

Therefore, we recommend the inclusion of the following additional wording (underlined) to Policy LEB5: Green and Blue infrastructure, which recognises that development on local green spaces may be required in 'very special circumstances', which includes for the delivery of wastewater and water infrastructure (engineering operations).

Proposals for the redevelopment of green spaces will not be permitted unless it can be clearly demonstrated that:

- i *Replacement areas will be at least equivalent in terms of quality, quantity and accessibility, and there will be no overall negative impact on the provision of green infrastructure; or*
- ii *A robust assessment clearly demonstrates that the space is surplus to local requirements and will not be needed in the-long term; or*
- iii *The proposal is for alternative recreational provision which meets evidence of local need in such a way as to outweigh the loss and includes multifunctional space that delivers a range of benefits including connectivity, reduced flood risk and urban cooling.*
- iv *It is in accordance with the 'very special circumstances' set out in the NPPF.*

Victoria Corrigan

From: LPAE-HIOW (TORBAY AND SOUTH DEVON NHS FOUNDATION TRUST) <[REDACTED]>
Sent: 13 October 2025 13:02
To: Local Plan
Cc: LPAE-HIOW (TORBAY AND SOUTH DEVON NHS FOUNDATION TRUST); KIRBY, Morag (NHS HAMPSHIRE AND ISLE OF WIGHT ICB - D9Y0V); ESTATESSTRATEGY (NHS HAMPSHIRE AND ISLE OF WIGHT ICB - D9Y0V)
Subject: Overton Neighbourhood Plan 2025-2040 - NHS Hampshire and Isle of Wight ICB Response

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Dear Planning Policy Team,

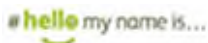
NHS Hampshire and Isle of Wight Integrated Care Board (ICB) have reviewed the Overton Neighbourhood Plan, it is noted that there is an allocation for approximately 400 dwellings. Watership Down Health: Overton Surgery is already under sized for its patient list size by circa 2,500 patients. An additional 400 dwellings would equate to circa 940 new patients (400 dwellings x 2.35 average occupancy) which would further the issue.

NHS Hampshire and Isle of Wight ICB will be seeking mitigation via developer contributions towards increasing the capacity at Watership Down Health: Overton Surgery for developments in the Overton Parish.

Please do not hesitate to contact us if you require any further information

Kind regards,

Hannah



Hannah O'Neill | Commercial Support Manager | LPAE Team

For and on behalf of:
NHS Cornwall ICB
NHS Devon ICB
NHS Somerset ICB
NHS Hampshire and Isle of Wight ICB



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