

Details of Representations Received to the Proposed Submission Local Plan (Reg19) February 2025

Otterbourne

This document has been prepared to provide details of the representations received to the Proposed Submission Plan and the Council's response. It draws upon information contained within the submitted documents SD07b [Regulation 22 Statement of Consultation Part 2 \(November 2024\)](#) and SD16 [Regulation 20 representations \(November 2024\)](#). It is not considered that this document contains information which is substantially different to that set out within those submitted documents, but it has been prepared to assist in navigating and considering the representations received and Council Response.

For each plan policy or associated document, it sets out some key information from the regulation 22 statement regarding the number of representations received, representation numbers, an overall summary of responses made, and a list of the main issues raised by the representations. It then contains all of the representations recorded against that Plan policy or document, along with links to supporting documents. Finally, it sets out the Council's response to the representations made for that Plan policy or document, and any changes the Council now recommends are made to the Plan policy or document, alongside any other relevant information.

This has been updated to include comments that were submitted by Historic England but were not entered onto Citizenspace and therefore they were not included in the original version of this report.

Local Plan Reference or document	Policy OT01 Land East of Main Road	
Total Number of Representations received	11	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	8	0
Sound	4	5
Complies with Duty to Cooperate	8	0
<p>Summary of Representations</p> <p>Responses revealed several key focus areas around Policy OT01 regarding housing strategy and local development in Otterbourne, aiming to balance new housing provision with local community needs and environmental sustainability.</p> <p>There is a strong demand from respondents for more flexible policies to better allocate housing lands and address infrastructure challenges, such as sewerage and water networks, to support increased populations without compromising environmental integrity. Respondents highlight Otterbourne’s capacity for sustainable growth, given its existing infrastructure but also raises concerns about current housing targets and the lack of specific site allocations. There is notable emphasis on protecting cultural and environmental assets alongside development, with particular attention on preserving open spaces and the ancient footpath. Some responses stated that the land at Park Farm, Land at Kiln Lane (OT03) scored the same as land at Main Road and they suggest that this site should also be allocated along with the site chosen for development in the Local Plan.</p>		
<p>Representation Numbers (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3B44-P - Otterbourne Parish Council/1/OT01</p> <p>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/2/OT01</p> <p>ANON-AQTS-32CB-3/1/OT01</p> <p>ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/1/OT01</p> <p>ANON-AQTS-329R-9/1/OT01</p> <p>ANON-AQTS-329U-C/1/OT01</p> <p>ANON-AQTS-32U8-B - Historic England/1/OT01</p> <p>ANON-AQTS-327U-A - Southern Water/2/OT01</p> <p>BHLF-AQTS-328Q-7/1/OT01</p> <p>BHLF-AQTS-328P-6/1/OT01</p> <p>BHLF-AQTS-328R-8 - Hampshire County Council/2/OT01</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Respondents raised concerns around the high windfall allowance and insufficient affordable housing provisions; 		

- Support for the settlement boundary is accepted for developable areas, specific site allocations are suggested to better meet housing needs;
- Support for the site from respondents due to the safe and good access to Main Road and close to the school;
- Infrastructure concerns were raised and responses asked for phased development to align with demands on sewerage, water networks, and flood prevention;
- Concerns were raised over phasing strategies that delay development beyond 2030, potentially limiting the use of greenfield sites. Suggestions include reassessing high windfall allowances in favour of specific site allocations to better meet housing needs;
- Responses stated that development should respect the local cultural landscape and maintain buffers near South Downs National Park, with flexibility in policies to support housing delivery needs effectively; and
- Some responses stated that the land at Park Farm, Land at Kiln Lane (OT03) scored the same as land at Main Road and they suggest that this site should also be allocated along with the site chosen for development in the Local Plan

Policy/Evidence base document	OT01
Name of respondent (or client)	Guy Robinson
Personal reference number	ANON-AQTS-32U8-B - Historic England
Full reference number	ANON-AQTS-32U8-B - Historic England/1/OT01
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	This site intersects with a Roman road. The policy is currently silent on this matter.
What modification(s) are necessary to make the policy legally compliant or sound?	<p>We recommend the Council take an approach similar to that taken for WK6 on archaeological investigation and appropriate supporting text.</p> <p>In common with our comment on paragraph 14.126, this site intersects with a Roman road. The policy is currently silent on this matter. We recommend the Council take an approach similar to that taken for WK6 on archaeological investigation and appropriate supporting text.</p>
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	<p>Yes</p> <p>Letter (commenting on policies)</p> <p>Email correspondence (between officers and Historic England)</p> <p>Email correspondence (between officers and Historic England re: suggested changes)</p>

Policy/Evidence base document	OT01
Name of respondent (or client)	Barwood Land
Personal reference number	ANON-AQTS-329R-9
Full reference number	ANON-AQTS-329R-9/1/OT01
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Please refer to additional information representations submitted by Grass Roots Planning on behalf of Barwood Land promoting Land off Cranbourne Drive OBJECTION TO POLICY OT01 - LAND EAST OF MAIN ROAD</p> <p>3.1 The key focus of these representations is based on Barwood Land's objection to draft Policy OT01: Land east of Main Road; which is considered unsound, as it is not justified by robust evidence, or an appropriate assessment of alternative sites to support its allocation.</p> <p>3.2 As we have previously highlighted to the Council in our representations to the Reg 18 Local Plan consultation, and furthermore in response to the Council's Reg 18 Summary of Consultation Responses document (see appendix 1) this site is considered inadequate to deliver the housing numbers required in Otterbourne and has a series of constraints which have yet to be appropriately addressed. This means that when viewed against an alternative option for the village – land off Cranbourne Drive, one that is less constrained and offers significantly greater benefits, questions are raised as to why this site has been included as the preferred allocation in the Reg 19 Local Plan.</p> <p>3.3 It is considered that the progression of Policy OT1 as it stands is unsound, as the evidence before the Council highlights various constraints, which would greatly impact the potential capacity deliverable on this site, and indeed potentially its deliverability. The previous questions we raised about this site remain unanswered, which also leads to questions regarding the transparency of decision making and the appropriate assessment of alternatives in progressing the allocation of this site. Various consultation exercises undertaken separately by Barwood Land and the Parish Council confirm this is not the favoured allocation for Otterbourne, and yet it remains the Council's preferred allocation. In response to this policy, we also again highlight the serious concerns which surround rushing to fast-track the Local Plan to examination; these are not new concerns and should therefore be addressed,</p>

	<p>as with concerns raised on numerous other areas of the Plan, prior to the Local Plan examination.</p> <p>3.4 In relation to the point set out in para 3.3, we refer specifically to the e-mail sent to the policy team on 31st July 2024 (appendix 2) and letter (see appendix 1) sent in response to the Council's e-mail sent 23rd August 2024. Within this letter we raised concerns regarding the robustness of Council's reporting regarding responses to the Reg 18 Local Plan consultation. This included the fact the representations submitted to Policy OT1 on behalf of Barwood Land were missing from the summary of comments to this Policy and as such, we cannot see how these concerns were properly considered by the Council or adequately reported to Members. We also requested that this was rectified ahead of the Cabinet Scrutiny meeting on 16th September (scrutiny meeting held to discuss fast tracking the Reg 19 Local Plan) which was not done. Indeed, the consultation on the Reg 19 Local Plan was progressed without updating Local Plan Representations Reg 19 Land off Cranbourne Drive, Otterbourne</p> <p>the inaccuracies or answering specific questions regarding the validity of the conclusions reached regarding site selection in this settlement.</p> <p>3.5 Whilst an e-mail was received from the Policy Team in relation to the initial correspondence, this only provided a vague response, which lacked any detail and failed to answer any of the specific points we raised. This is despite acknowledging they had incorrectly missed Barwood Land's objections to Policy OT1 in the summary of responses, as our representations were recorded under the 'Omission Sites' section with our comments regarding site OT1 largely omitted. This is clearly incorrect as the representations state they are in direct objection to Policy OT1. This was never rectified, and we received no response to the letter sent prior to the Reg 19 consultation.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>This comment has been summarised – see supporting information for full response</p> <p>Please refer to additional information representations submitted by Grass Roots Planning on behalf of Barwood Land promoting Land off Cranbourne Drive OBJECTION TO POLICY OT01 - LAND EAST OF MAIN ROAD</p> <p>3.1 The key focus of these representations is based on Barwood Land's objection to draft Policy OT01: Land east of Main Road; which is considered unsound, as it is not justified by robust evidence, or an appropriate assessment of alternative sites to support its allocation.</p> <p>3.2 As we have previously highlighted to the Council in our representations to the Reg 18 Local Plan consultation, and furthermore in response to the Council's Reg 18 Summary of Consultation Responses document (see appendix 1) this site is considered inadequate to deliver the housing numbers required in Otterbourne and has a series of constraints which have yet to be appropriately addressed. This means that when viewed against an alternative option for the village – land off Cranbourne Drive, one that is less constrained and offers</p>

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Land off Cranbourne Drive, Otterbourne

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What is your suggested wording or text for the policy?

This comment has been summarised – see supporting information for full response

Please refer to additional information representations submitted by Grass Roots Planning on behalf of Barwood Land promoting Land off Cranbourne Drive OBJECTION TO POLICY OT01 - LAND EAST OF MAIN ROAD

3.1 The key focus of these representations is based on Barwood Land's objection to draft Policy OT01: Land east of Main Road; which is considered unsound, as it is not justified by robust evidence, or an appropriate assessment of alternative sites to support its allocation.

3.2 As we have previously highlighted to the Council in our representations to the Reg 18 Local Plan consultation, and furthermore in response to the Council's Reg 18 Summary of Consultation Responses document (see appendix 1) this site is considered inadequate to deliver the housing numbers required in Otterbourne and has a series of constraints which have yet to be appropriately addressed. This means that when viewed against an alternative option for the village – land off Cranbourne Drive, one that is less constrained and offers significantly greater benefits, questions are raised as to why this site has been included as the preferred allocation in the Reg 19 Local Plan.

3.3 It is considered that the progression of Policy OT1 as it stands is unsound, as the evidence before the Council highlights various constraints, which would greatly impact the potential capacity deliverable on this site, and indeed potentially its deliverability. The previous questions we raised about this site remain unanswered, which also leads to questions regarding the transparency of decision making and the appropriate assessment of alternatives in progressing the allocation of this site. Various consultation exercises undertaken separately by Barwood Land and the Parish Council confirm this is not the favoured allocation for Otterbourne, and yet it remains the Council's preferred allocation. In response to this policy, we also again highlight the serious concerns which surround rushing to fast-track the Local Plan to examination; these are not new concerns and should therefore be addressed, as with concerns raised on numerous other areas of the Plan, prior to the Local Plan examination.

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	<p>Local Plan Representations Reg 19 Land off Cranbourne Drive, Otterbourne the inaccuracies or answering specific questions regarding the validity of the conclusions reached regarding site selection in this settlement. 3.5 Whilst an e-mail was received from the Policy Team in relation to the initial correspondence, this only provided a vague response, which lacked any detail and failed to answer any of the specific points we raised. This is despite acknowledging they had incorrectly missed Barwood Land's objections to Policy OT1 in the summary of responses, as our representations were recorded under the 'Omission Sites' section with our comments regarding site OT1 largely omitted. This is clearly incorrect as the representations state they are in direct objection to Policy OT1. This was never rectified, and we received no response to the letter sent prior to the Reg 19 consultation.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (commenting on policies, policies map & evidence base - includes tables and pictures) Supporting document 1 (Vision document - Cranbourne Drive) Supporting document 2 (Preliminary Ecological Appraisal (PEA)) Supporting document 3 (Preliminary Flood Risk and Drainage Review) Supporting document 4 (Heritage Appraisal) Supporting document 5 (Map - Compliant Site Access) Supporting document 6 (Local Plan Site Promotion - Transport)</p>

Policy/Evidence base document	OT01
Name of respondent (or client)	David Green
Personal reference number	ANON-AQTS-32CB-3
Full reference number	ANON-AQTS-32CB-3/1/OT01
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Although none of the SHELAA sites for Otterbourne are perfect, this site (OT01) provides good access and safe to Main Road. It is also within easy walking reach of the school with safe controlled (both zebra and pelican) crossings for children and parents. Situated on the east side of the village it also helps to balance housing dispersion on either side of the Main Road. The proposed transfer of ownership of the non-developable land to Otterbourne Parish Council under section 106 will also preserve the ancient footpath that crosses this part of the site and provides a popular walk for residents of the village.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or
tracked changes, if applicable.*

Policy/Evidence base document	OT01
Name of respondent (or client)	Georgina Cox
Personal reference number	BHLF-AQTS-328Q-7
Full reference number	BHLF-AQTS-328Q-7/1/OT01
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Land East of Main Road</p> <p>Gladman welcome and support the proposed allocation of the Land East of Main Road for the delivery of 55 residential dwellings and associated open space in Policy OT01.</p> <p>Land East of Main Road was assessed within the Strategic Housing and Economic Land Availability Assessment (SHELAA) produced in 2023, the site promoted under the SHELAA was referred to as OT03: Land off Main Road, Otterbourne.</p> <p>OT03 was identified for having the capacity for 106 dwellings over the 6.4 ha site, alongside being available and capable of delivery within the next 5 years.</p> <p>A number of constraints including protected trees and Countryside Policy MTR44 were identified, however two previous planning applications on the site have shown that these policy considerations and designations can be included and enhanced within a deliverable and viable scheme.</p> <p>Gladman note the role that Otterbourne Parish Council have had in the selection of potential site allocations within their boundary. Gladman have previously worked proactively with the Parish Council to demonstrate that site could be brought forward in a manner which allows housing needs in the village to be met while also respecting the Parish Council's wishes to retain the eastern parcel of land within the site boundary as open space</p> <p>for the benefit of the community. Gladman fully support the resulting potential allocation of the land and look forward to further engagement as the site is brought forward.</p> <p>However, noting the potential increase in housing requirement in the near future within Winchester. Gladman suggest that the site is capable of accommodating in excess of the 55 dwellings proposed whilst retaining land beyond the PROW through the site and significant elements of open space. We are requesting a change to the plan in terms of increased flexibility in terms of the final masterplan for the development of the site.</p> <p>Gladman highlight that the site is also available and achievable with a realistic prospect that the site could be delivered within five years from adoption of the Local Plan. However, the current policy wording sets a phasing restriction whereby permission for housing development will not be granted before 2030. As</p>

	<p>highlighted in response to Strategic Policy H2, Gladman do not consider that the current phasing strategy is effective or justified in line with Paragraph 35 of the NPPF and an alternative mechanism should be utilised to support the delivery of PDL that does not seek to restrict available and deliverable greenfield sites that have been deemed suitable for residential development and allocation.</p> <p>The policy wording in paragraph 14.163 in the Regulation 19 plan has remained the same to paragraph 14.121 from the Regulation 18 draft plan. Gladman would request that the policy wording is amended to make explicit that any requirement for net biodiversity gain, either through policy NE1 or legislation, can be provided within the area offset for open space. This reflects the discussions which we have been held with the Parish Council for the eastern side of the site to be retained ensuring plentiful green space so that it is open and accessible to the public as the policy states.</p> <p>As stated in the above response to policy H2, greenfield sites which can contribute immediately to the identified housing needs of an area should be supported and in turn this will support the Council in bringing forward PDL which is often subject to unexpected delays in delivery. The policy constraint phases the OT01 allocation to not be delivered until post 2030, Gladman believe this should be removed in order to provide flexibility and ensure WCC achieve a five-year housing land supply.</p> <p>Appendix 1 of this submission provides further detail on the proposals for Land East of Main Road, Otterbourne and the commitment to deliver the site for residential development.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i></p>	<p>Yes Form (refers to letter) Supporting information (commenting on policies and proposed site)</p>

*may contain additional details,
such as images, tables, or
tracked changes, if applicable.*

Policy/Evidence base document	OT01
Name of respondent (or client)	Messrs Jenssen & Collins
Personal reference number	BHLF-AQTS-328P-6
Full reference number	BHLF-AQTS-328P-6/1/OT01
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>Draft policy OT01 (and H2 accordingly)</p> <p>We object to the sole allocation of draft policy OT01 (55 dwellings in Otterbourne) for the reason that it attaches a disproportionate burden of delivery on a single site, and runs contrary to the views of the Parish Council.</p> <p>Otterbourne is a sustainable settlement with a range of facilities and services.</p> <p>Reg19 paragraph 14.152 acknowledges that there is capacity for the development of about 75 dwellings in Otterbourne, which could be achieved through the delivery of approximately 55 new homes through new site allocations and approximately 20 new windfall dwellings.</p> <p>The latest SHELAA identifies no suitable sites within the settlement boundary of Otterbourne which could deliver windfall dwellings. Hence, provision will need to be made for the release of land beyond the settlement boundary to deliver new homes.</p> <p>SHELAA ref.OT05 is located in a highly sustainable location being walkable to a range of local facilities and services (including primary school – 15 minute walk; convenience store – 10 minute walk; play area/recreation ground – 3 minute walk), as well as close to a regular bus service (bus stop – 4 minute walk). SHELAA ref.OT05 is not located within a Conservation Area and is not within the setting of any listed buildings.</p> <p>At Reg18 stage, the Parish Council supported the allocation of several smaller sites around the village, including SHELAA ref.OT05.</p> <p>2022 Parish Council minutes acknowledge that SHELAA ref.OT05 could reduce the impact of traffic through the village and will lessen the burden on the drainage infrastructure.</p> <p>NPPF#70 acknowledges that smaller sites “can make an important contribution to meeting the housing requirement of an area, and are often built up relatively quickly”.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	The draft Local Plan should allocate SHELAA ref.OT05 for residential development in order to meet the identified housing needs of the community.

What is your suggested wording or text for the policy?	Land at Waterworks Road, Otterbourne as shown on the Policies Map is allocated for about 10 dwellings.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form 1 (OT01 and H2) Form 2 (H4) Form 3 (Settlement Boundary review - Otterbourne) Form 4 (SP2)

Policy/Evidence base document	OT01
Name of respondent (or client)	Morag Kirby
Personal reference number	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
Full reference number	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/2/OT01
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The ICB supports the current policy statements.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies)

Policy/Evidence base document	OT01
Name of respondent (or client)	Neil Massie
Personal reference number	BHLF-AQTS-328R-8 - Hampshire County Council
Full reference number	BHLF-AQTS-328R-8 - Hampshire County Council/2/OT01
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	55 dwellings is likely to generate up to 17 additional primary age pupils and 12 at secondary age. The site is served by Otterbourne CE Primary School and a shared catchment for Thornden School and Crestwood School at Secondary. It is likely that these could be accommodated within the existing primary and secondary provision.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies and evidence base)

Policy/Evidence base document	OT01
Name of respondent (or client)	Parish Clerk
Personal reference number	ANON-AQTS-3B44-P - Otterbourne Parish Council
Full reference number	ANON-AQTS-3B44-P - Otterbourne Parish Council/1/OT01
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy OT01: Otterbourne Parish Council agrees with this policy for the development of about 55 dwellings on Land East of Main Road. Text 14.158: Council considers it important to emphasize that the settlement boundary should only be extended to include the developable part of the area in order to protect the integrity of the proposal and its approval for development of the site.</p> <p>In addition to the 55 dwellings, a potential windfall of 20 additional dwellings is noted.</p> <p>The “Net Completions in or adjoining settlement (2020-2023)” value in the table currently shows 2 dwellings. The houses we have recorded as built completion during this period were 2 blocks of semi-detached houses on Main Road, Otterbourne. We consider the number of dwellings should therefore read 4 and ask that this increase be used to reduce the figures for windfall provision accordingly.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or</i>	No

allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.

Policy/Evidence base document	OT01
Name of respondent (or client)	Ryan Patrick Lownds
Personal reference number	ANON-AQTS-327U-A - Southern Water
Full reference number	ANON-AQTS-327U-A - Southern Water/2/OT01
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>We welcome the inclusion of the criterion below for Policy OT01 Main Road: Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider. Ensure that the groundwater Source Protection Zone is protected Supporting Text: Southern Water is the statutory wastewater undertaker for the area where this site is allocated. In accordance with this, we undertook an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for the proposal at the site. The assessment revealed that local sewerage infrastructure in closest proximity to the sites has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure. Proposals for the number of dwellings at the site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 180(e) of the revised National Planning Policy Framework (NPPF) (2023). Our assessment also revealed that this site lies within groundwater Source Protection Zone (SPZ) 1. Developers will need to consult with the Environment Agency to ensure the protection of the public water supply source is maintained and inform Southern Water of the outcome of this consultation. Hampshire Water Transfer & Water Recycling Project</p>

	<p>In our representations to the Regulation 18 Local Plan, we noted that three draft housing allocations (CC4 85 Church Land, KN1 Ravenswood and OT01 east of Main Road) were located entirely or partially within the broad corridor options we presented in our Summer 2022 consultation.</p> <p>We have now refined these corridors down to a preferred route and identified draft Order Limits in our Summer 2024 consultation. We can confirm that the draft Order Limits entirely avoid these three allocations and do not encroach on any other draft development allocations</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>No, I don't want to take part in a hearing session</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Supporting Document (Commenting on policies)</p>

Policy/Evidence base document	OT01
Name of respondent (or client)	South Downs National Park Authority (SDNPA)
Personal reference number	ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)
Full reference number	ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/1/OT01
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.
What modification(s) are necessary to make the policy legally compliant or sound?	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.
What is your suggested wording or text for the policy?	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.

Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Email (Commenting on NE8) Letter (Commenting on policies) Email correspondence (Re policy NE8)

Policy/Evidence base document	OT01
Name of respondent (or client)	St Philips Strategic Land
Personal reference number	ANON-AQTS-329U-C
Full reference number	ANON-AQTS-329U-C/1/OT01
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response. Promoting omission site:</p> <p>DEVELOPMENT ON PARK FARM, LAND AT KILN LANE, OTTERBOURNE [REFER ALSO TO SEPARATE EMAIL VERSION OF SUBMISSION]</p> <p>The Consultation Plan has been prescriptive in providing a breakdown of how and where this windfall provision is to be delivered; with a 20 dwelling windfall provision identified for each of the five Intermediate Rural Settlements. However, identifying specific windfall provision to each settlement would, firstly, seem at odds with the very nature of ‘windfall’ development where it is not possible to predict specifically where this development will come from and be located, and secondly, the evidence of past completions in these settlements would suggest that the level of windfall provision proposed is not reflective of past levels of completions.</p> <p>As set out in the Local Housing Needs Assessment provided at Appendix 2, [REFER TO SEPARATE EMAIL VERSION OF SUBMISSION], for Otterbourne, completions over the last 15 years from 2008-09 to 2022-2023 have only totalled 12 dwellings, an average of 0.8 dpa. If this average annual delivery was taken forward for the remaining 16 years of the Consultation Plan period, this would deliver less than 13 dwellings – a level materially lower than the windfall allowance attributed to Otterbourne.</p> <p>Paragraph 69 of the Framework is clear that planning policies should be identifying “specific” deliverable and developable sites, but the Consultation Plan does not do this and instead chooses to include generic (and unrealistic) windfall allowances for these Intermediate Rural Settlements. The Council’s own evidence points to the fact that there are sustainable, deliverable sites at these settlements that could be allocated in the Plan and eliminate the need for a windfall allowance in meeting the current proposed level of housing in the Consultation Plan, but also an increased provision on the basis that the Council is not proposing to meet enough of the unmet needs of neighbouring authorities. One such example would be Park Farm, Kiln Lane, Otterbourne (SHELAA site ref: OT04).</p> <p>A further reason why the Council should be seeking to identify specific sites for the delivery of housing, in the smaller settlements of the District, is that the evidence of past completions – refer to the Local Housing Needs Assessment provide at Appendix 2 [REFER TO SEPARATE EMAIL VERSION OF SUBMISSION] – is</p>

	<p>that windfall development largely comes forward in developments of 1 and 2 net additional dwellings, and almost exclusively providing less than 5 dwellings. Whilst this form and scale of development would be liable to Community Infrastructure Levy (CIL) contributions, they would not provide any affordable housing, or be of the scale to be able to provide any on-site community infrastructure, or contribute to off-site community infrastructure provision not covered by CIL.</p> <p>Summary The Consultation Plan has not been positively prepared in recognising the greater sustainability merits of Otterbourne and the need for additional housing, both in terms of quantum and mix, and for the provision of affordable housing in order to address the inherent housing characteristics and demographics of the village. Accordingly, further development should be allocated to Otterbourne, specifically Park Farm, Kiln Lane. Otterbourne is also ideally located to contribute to meeting the unmet housing needs of the PfSH area. As such, Policy H3 and the associated Otterbourne housing delivery section of the Consultation Plan should be amended, to provide for additional development in Otterbourne.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>Policy H3 and the associated Otterbourne housing delivery section of the Consultation Plan should be amended, to provide for additional development in Otterbourne.</p> <p>This would mean the inclusion of a further specific policy in the Otterbourne section (e.g. Policy OT02) of the Consultation Plan with the Otterbourne Housing Sources Table, currently on page 477 of the Consultation Plan being amended accordingly. This would necessitate consequent revisions to Policies SP2, H1 and H3 accordingly to account for the amended housing provision.</p>
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i></p>	<p>Yes</p>

*may contain additional details,
such as images, tables, or
tracked changes, if applicable.*

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed Modification](#) agreed with Historic England regarding new criterion ix in policy (relating to archaeology and heritage).

[Proposed Modification](#) agreed with Historic England new para between 14.156 and 14.157 (relating to an archaeological assessment).

[Proposed Modification to Local Plan policies map](#) to include the boundary of the South Downs National Park in the allocation and inset maps