

Mrs Clare Cotterell  
Clerk  
Houghton Parish Council.

**Planning Policy and Economic Development**  
**Beech Hurst**  
**Weyhill Road**  
**Andover, Hants SP10 3AJ**  
**Telephone 01264 368000**  
**Minicom 01264 368052**  
**Web site [www.testvalley.gov.uk](http://www.testvalley.gov.uk)**

**Contact:** Sarah Hughes  
**Telephone:** 01264 368150  
**E-mail:** [shughes@testvalley.gov.uk](mailto:shughes@testvalley.gov.uk)  
**Your ref:**  
**Our ref:** pp11\_10 Houghton NDP  
**Date:** 7 November 2021

## **Response to the Houghton Neighbourhood Plan Submission Document, September 2021 (Regulation 16 Consultation)**

### **Introduction**

These comments set out the Council's response to the 'Regulation 16' consultation on the Houghton Neighbourhood Plan ('HNP'), which was submitted to the Council on 17<sup>th</sup> September 2021

The Houghton Neighbourhood Area was designated on 13 June 2017.

Comments were provided on a draft plan during the Regulation 14 consultation, which took place from 12<sup>th</sup> April 2021 to 7<sup>th</sup> June 2021.

The comments that follow are made in the interests of ensuring that the HNP is in general conformity with the strategic policies set out in the Test Valley Local Plan and can be effectively interpreted by the Council in determining planning applications.

These comments should be read in conjunction with the Regulation 16 track changes document that the Council has produced, showing all the comments made on the document.

The Council recognises the efforts that have gone into the Houghton Neighbourhood Plan and the amount of community consultation that has taken place to shape the plan into its current form.

### **The Basic Conditions**

The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Development Plans by section 38A of the Planning and Compulsory Purchase Act 2004. They state that a draft Neighbourhood Plan meets the basic conditions if it:

- (a) has regard to national policies and advice contained in guidance issued by the Secretary of State.
- (b) has special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses.
- (c) has special regard to the desirability of preserving or enhancing the character or appearance of any conservation area.
- (d) contributes to the achievement of sustainable development,
- (e) 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),
- (f) does not breach, and is otherwise compatible with, EU obligations,

The Council considers that some changes are needed to ensure that the Neighbourhood Plan meets the Basic Conditions as required by regulations. These changes will ensure that the draft plan is in general conformity with the strategic policies of the Test Valley Local Plan (Condition e), that it has regard to national policy and guidance (Condition a), and that it will contribute to the achievement of sustainable development (Condition d).

The Council considers that the plan in its current form does meet part f) of the Basic Conditions which require that it does not breach and is otherwise compatible with EU obligations.

It is considered that the suggested changes can be made to the plan without additional consultation being needed as they retain the general direction of the policies in the plan, but make changes, primarily to ensure clarity for the decision maker and make the document easier to use.

### **Submission of the Draft Neighbourhood Plan**

The draft neighbourhood plan was submitted to the Council on 17<sup>th</sup> September 2021 and commenced its 6-week public consultation on 27<sup>th</sup> September until 9<sup>th</sup> November 2021.

Test Valley Borough Council, as local planning authority, has considered the submitted plan and is satisfied that it complies with all of the relevant statutory requirements set out in paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The submitted plan is accompanied by a Basic Conditions Statement and a Consultation Statement. The supporting evidence base documents can be found at [Neighbourhood Development - Houghton Parish Council](#)

### **Strategic Environmental Assessment (SEA)**

Natural England, Environment Agency and Historic England, as statutory consultation bodies under Regulation 9 of the SEA Regulations, were consulted by the Council on an SEA screening determination between 5<sup>th</sup> November and 11<sup>th</sup> December 2019. All three bodies agreed with the screening determination of the Council that the HNP is not likely to have significant environmental effects and therefore an SEA is not required.

### **Habitats Regulations Assessment (HRA)**

Test Valley Borough Council issued an HRA screening determination concluding that the HNP would have no likely significant effects upon European designations alone or in combination and no appropriate assessment is currently required. This is supported by the response from Natural England.

### **Test Valley Local Plan.**

The Test Valley Local Plan was formally adopted by the Council in January 2016, and provides a positive and flexible overarching planning policy framework for the Borough the period up to 2029. A number of the policies in the Core Strategy are particularly relevant to the Houghton area and draft HNP.

Policy COM2, 'Settlement Hierarchy identifies the settlements where sustainable development will take place in the Borough. Houghton is within the 'rural villages' designation. The scale of development in the rural villages is limited to development within the settlement boundary of the village. Development may also come forward from windfalls,

rural affordable housing sites, replacement dwellings, small business uses, the reuse of buildings and community led development, which could be delivered through a Neighbourhood Plan.

The housing requirement for the Borough is split into two parts, with Houghton in Northern Test Valley along with Andover. This is further split into a housing requirement for Andover and the remaining Northern Rural Test Valley for which the minimum annual requirement is 36 new homes per year.

Policy COM9 is also of relevance as it concerns Community Led Development. This policy allows for community led development with or without a Neighbourhood Plan, and the supporting text acknowledges that where Neighbourhood Plans are produced, that they should be referred to evidencing the community support for a scheme.

The following policies are the relevant Strategic Local Plan Policies that the Neighbourhood Plan needs to be in conformity with:

- Policy COM1: Housing Provision 2011 – 2029
- Policy COM2: Settlement Hierarchy
- Policy COM7: Affordable Housing
- Policy COM8: Rural Exception Affordable Housing
- Policy COM14: Community Services
- Policy COM15: Infrastructure
- Policy LE10: Retention of employment land and strategic employment sites
- Policy E1: High Quality Development in the Borough
- Policy E2: Protect, Conserve and Enhance the Landscape Character of the Borough
- Policy E3: Local Gaps
- Policy E5: Biodiversity
- Policy E6: Green Infrastructure
- Policy E7: Water Management
- Policy E9: Heritage
- Policy LHW1: Public Open Space
- Policy T1: Managing Movement
- Policy T2: Parking Standards

The Local Plan also contains other non-strategic policies which may be relevant to the HNP. These include:

- Policy COM9: Community Led Development
- Policy COM10: Occupational Accommodation for Rural Workers in the Countryside
- Policy COM11: Existing Dwellings and Ancillary Domestic Buildings in the Countryside
- Policy COM12: Replacement Dwellings in the Countryside
- Policy COM13: Gypsies, Travellers and Travelling Showpeople
- Policy LE16: Re-Use of Buildings in the Countryside
- Policy LE17: Employment Sites in the Countryside
- Policy LE18: Tourism
- Policy E8: Pollution
- Policy LHW4: Amenity
- Policy CS1: Community Safety
- Policy ST1: Skills and Training

## **HOUGHTON NEIGHBOURHOOD PLAN**

### **Section 1 –Setting the Scene**

This section gives an overview the format of the plan and sets out the national and local planning policy context.

### **Section 2 –Houghton Neighbourhood Area**

This section gives an overview of the Parish to give the reader a better understanding of the area and what gives its sense of place, and includes maps showing the designated area, Flood Zones, SSSI's and SINCS and the Conservation Area.

Houghton Lodge registered park and garden is mentioned in para 2.17, and it would be helpful if this was shown on Plan 4. TVBC can help with this map.

### **Section 3 – Vision and Objectives.**

The HNP contains a vision and 11 objectives which are split into the following topics:

Community, Built environment, Natural Environment and the delivery of the Plan.

The policies and recommendations in the plan all relate to the 11 objectives that follow the vision statement.

### **Plan Layout**

The policies in the plan have been divided into five groups – Sustainable Development, Community, Built Environment, Natural Environment and the delivery of the Plan. This division makes sense and makes the plan easy to navigate.

### **Section 4 – Sustainable Development Policy**

This section contains one policy and supporting text.

### **Section 5 – Community Policies**

This section contains two policies and supporting text.

#### HTN2

The following text would benefit from the addition shown in bold.

*Development involving the loss of the community services, facilities and recreational open space **listed below** and shown on Plan 5*

#### HTN3

The following text would benefit from the addition shown in **bold** and the deletion shown in ~~strike~~through.

*New housing development should provide dwellings of a type and size that meets the latest assessment of local needs. This includes ~~predominantly~~ providing dwellings with 2- and 3- bedrooms to meet the need for smaller properties. Larger dwellings will only be supported where there is up-to-date evidence of a local need for such homes.*

#### Paragraph 5.10

A scheme of up to 10 dwellings would not provide any AH unless on a rural exception site.

### **Section 6- Built Environment Policies**

This section contains two policies and its supporting text.

#### Paragraph 6.3

'Appendix B' This could now refer to the National Design Model code, which has recently been published.

### Table 2 – Key Characteristics

This section would benefit from photographs of the types of features indicated in the text.

This will help with the clarity of the table, as it will be clear what is locally distinctive.

In 'Plot Size' What do 'sizeable gardens' mean in practice?

### Policy HTN5

The second half of the policy would benefit from being in a separate policy for non-designated heritage assets. The policy only needs to identify the assets, and once identified the Local Plan Heritage Policies will apply.

### Plan 6

A clearer map would be helpful.

## **Section 7 – Natural Environment Policies**

This section contains four policies and its supporting text.

### HTN6

Bullet 4. *'provides for any impacts to be satisfactorily mitigated by a landscaping scheme which is itself acceptable.'* Acceptable to whom?

### HTN9

*'of biodiversity value.'* The majority of land will have a biodiversity value, whether it be a high or a low value . How will this be measured?

### Para 7.25

*'Bullet 1 - 'of biodiversity value.'* The majority of land will have a biodiversity value, whether it be a high or a low value . How will this be measured?

*'Bullet 6 - 'designated **and non designated** heritage assets'* Add designated and non designated to the text for clarity.

## **Appendix B - Design Components**

This section contains a list of the design components that should be taken into consideration when designing a scheme.

This section could be removed as it has been superseded by the national design model, which applicants should now take into account.

**Sarah Hughes** MRTPI

Senior Neighbourhood Planning Officer

Planning Policy

Test Valley Borough Council