

# Houghton Neighbourhood Development Plan, Submission Draft

## Houghton Parish Council response to Examiner's Questions

January 2022

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This document is the response of Houghton Parish Council (HPC) to 14 questions raised by the Independent Examiner following his initial assessment of the submitted Houghton Neighbourhood Development Plan (NDP) and supporting evidence. Joint responses by HPC and Test Valley Borough Council to two other questions are being provided separately.

**1. In policy HTN1 (page 13) it states that the objectives 'will be sought and balanced'. What does this mean?**

HPC response: policy HTN1 identifies aspects of the economic, social and environmental components of sustainable development which are seen as locally important and relevant. The policy acknowledges they all contribute to the achievement of sustainable development and that they are interdependent. As further explained in NDP paragraph 4.3, they may sometimes conflict; such variable impacts across the objectives will need to be assessed in considering how any individual development proposal contributes in the round to sustainability. A view will need to be taken by the decision-maker as to how any such conflicts are weighed against each other in determining whether planning applications are granted or refused. This is the 'balancing' referred to in the policy.

**2. With regard to affordable housing provision, the Borough Council advises<sup>1</sup> that a scheme of up to 10 dwellings would not provide any affordable housing, unless on a rural exception site. How does this tally with the last sentence of paragraph 5.10 in the HNNDP which refers to a 'scheme of 6-10 homes' (page 17)? Could the Parish Council provide clarified text?**

HPC response: the sentence referred to is reporting the findings of the Housing Needs Survey carried out by Action Hampshire in 2018 rather than making a policy proposal. Insofar as it refers to providing affordable housing it is not achievable in an open market scheme of 6-10 homes. It is suggested that the survey conclusion as reported in the last sentence of NDP paragraph 5.10 be clarified by the following additional sentence:

"Whilst under Local Plan policies a scheme of up to 10 dwellings would not provide any affordable housing unless on a rural exception site, the Survey findings as to the size of dwellings sought locally are relevant and capable of being achieved through a scheme of this size."

**3. In the last sentence of paragraph 5.11 (page 17) there is a reference to 'people who wish to commission or build their own homes'. Could the Council explain how policy HTN3 will help to achieve that objective?**

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<sup>1</sup> See track change version of the HNNDP submitted by TVBC.

HPC response: the sentence referred to was introduced after the regulation 14 consultation in responding positively to a comment from a resident (resident 8) on this matter. This is not seen as an objective as such, more an acknowledgement that self and custom-built dwellings may have a role to play in providing a mix of types of new housing. To reflect this more explicitly in the policy, an addition is suggested to policy HTN3:

“As part of providing a range of housing types, self and custom-build dwellings will be supported subject to other development plan policies.”.

**4. In Table 2 (page 21):**

- **In the third bullet point there is reference to properties in South End and Bossington. Could the Parish Council confirm that these properties are within the Neighbourhood Plan area, as I note on Plan 1 that the name ‘Bossington’ appears to the south of the plan boundary?**
- **Under ‘Plot Size’ there is reference to ‘sizeable gardens’. How would a decision-maker know how ‘sizeable’ is defined?**

HPC response:

- Table 2 page 21 fourth and fifth bullets: the Bossington Lodges referred to in the fourth bullet are outside the Neighbourhood Area and this reference should be removed. Reference to Bossington in the fifth bullet should be removed. South End Cottages and River Cottage referred to in this bullet are within the Neighbourhood Area.
- Plot size: this statement in Table 2 is an acknowledgement that generous gardens around detached properties are a key characteristic of the locality. In applying policy HTN4 criterion 2, a decision-maker would consider the proposed plot size and garden provision in assessing whether any development proposal was in keeping with the character of properties in the locality (along with scale, height, materials and detailing, which are stated in the criterion). Since ‘sizeable gardens’ is inevitably a relative term, it is envisaged this would be done by assessing the size of gardens to neighbouring properties against the proposal, so ensuring that the immediate character of the locality was protected and enhanced.

**5. Policy HTN5 (page 23) addresses both the Conservation Area and non-designated heritage assets. In the interests of clarity, I consider that there should be separate policies for the Conservation Area and for non-designated heritage assets. Unless there is a substantive reason not to adopt that approach, can the Parish Council agree revised wording for the two policies (based on the existing wording).**

HPC response: revised wording for separate policies for (a) the Houghton and Bossington Conservation Area and (b) non-designated heritage assets in the Conservation Area are set out below, together with a revised paragraph 6.8. An additional plan will be prepared to show the non-designated heritage assets (see response to question 6 below). Since both policies refer to the Conservation Area, it is envisaged that for reasons of clarity and economy they will both be included under the heading “Houghton and Bossington Conservation Area” with a shared explanatory text (headed “The reasons for these policies”) and evidence section (“The evidence for these policies”). Consequential changes will be needed to subsequent policy and plan numbers.

#### “Policy HTN5 Houghton and Bossington Conservation Area

Development proposals in or adjacent to the Houghton and Bossington Conservation Area should preserve or enhance its character or appearance, having regard to its significance and special interest as this is set out in the Conservation Area Policy document adopted by Test Valley Borough Council, including by:

1. reflecting traditional building forms in terms of density, height, massing and scale; and
2. using local or traditional materials, colours and detailing; and
3. retaining and reinforcing local landscape features such as trees and hedgerows.

#### Policy HTN6 Non-designated heritage assets in the Conservation Area

In considering proposals affecting non-designated heritage assets in the Conservation Area as listed below and shown on Plan 7, regard will be had to the scale of any harm or loss and the significance of the asset concerned:

- Rectory Cottage
- Rose Cottage
- School House
- Church Stowe including boundary walls
- Wayside Cottages
- The Boot Inn
- Yew Tree Cottage
- Walnut Cottage
- Orchard Cottage
- Outbuilding north of Forge Cottage
- Rosemary Cottage
- The Old Post Office
- Coopers Farm
- Meadow Barn (eastern part)
- Riverside
- Walled garden in grounds of Kent’s Orchard
- Properties north-east of Meadow View (2)
- Estate cottages opposite The Rowans
- Roadside building south of The Rowans
- Terrace of four dwellings at Houghton Corner
- South End Cottages
- Testwood House
- Littlemead
- Test Lodge
- Dairy House
- Buildings north-east of Bossington Mill.

6.8 National planning policy and Local Plan policy E9 require that heritage assets such as Conservation Areas are conserved in a manner appropriate to their significance. Policy HTN5 gives weight to the Conservation Area Policy published by the Borough Council. It

applies only to that part of the Conservation Area within the Houghton Neighbourhood Area. It will ensure that such aspects as traditional building forms, materials and landscape features, identified in the Policy document as contributing to the special interest of the Conservation Area, will be considered in assessing the impact of development proposals on its significance. Non-designated heritage assets within the Conservation Area are listed in policy HTN6 and shown on Plan 7. These were originally identified as buildings/walls of local interest in the Conservation Area Policy document.”.

**6. Does the Parish Council agree that a plan which identifies the non-designated heritage assets (as set out on page 23) would assist the decision-maker and if so, can such a plan be prepared for insertion into the HNDP?**

HPC response: the non-designated heritage assets listed in policy HTN5 are taken from the Borough Council’s 1990 Conservation Area Policy document where they are identified as “Building/wall of local interest” on the Appraisal Map. This is reproduced as Plan 6 in the NDP although it is agreed that a specific plan identifying non-designated heritage assets would provide greater clarity and so be of assistance to the decision-maker. A modification that such a plan be included would therefore be welcomed. Test Valley Borough Council has kindly agreed to provide the plan for inclusion in the referendum version of the NDP when this is prepared in due course, pursuant to the outcome of the Examination.

**7. In policy HTN6(4), on page 26, to whom should the scheme be acceptable?**

HPC response: this provision seeks to ensure that landscaping which is proposed in mitigation of a development’s landscape impact is not in itself out of character with the surrounding landscape context. The test of acceptability is to be applied by the decision-maker. The wording is also used in policy HTN9 criterion 2. If an alternative is thought to be required a suggestion would be as follows, modelled on policy HTN6 criterion 8:

“provides for any impacts to be satisfactorily mitigated by a landscaping scheme which is itself not out of character with the landscape.”.

**8. Can the Parish Council confirm that the protection of views, as set out in policy HTN7 (page 31) only relates to public views?**

HPC response: the Parish Council can confirm this is the case.

**9. On page 9 of the Basic Conditions Statement it states that the LGS designations ‘complement investment in jobs, homes and other essential services’. Could the Parish Council provide more detailed justification for this statement?**

HPC response: this part of the Basic Conditions Statement concerns policy HTN8 and makes reference to the NDP’s Vision, objectives and policy HTN1. These show that development and investment needs have been taken into account alongside environmental matters in contributing to

the achievement of sustainable development. The three objectives of sustainable development (economic, social and environmental) have been identified, addressed and balanced. For instance, the objectives refer to housing, community services and facilities, and infrastructure such as renewable and low carbon energy projects, as well as to the built and natural environments. Policy HTN1 is an over-arching policy which refers to housing, services and facilities, small business uses and the re-use of buildings for commercial purposes, as well as environmental aspects, further demonstrating that the three objectives of sustainable development have been considered in the round in preparing the NDP.

In applying the national policy that LGS designation should complement investment in sufficient homes, jobs and other essential services, regard must be had to the character, needs and opportunities of the Neighbourhood Area, which is deeply rural. Houghton is a village known for its quiet charm, rural character and natural, unspoilt beauty. The Test Valley Borough Council Local Plan identifies the type and scale of investment in homes, jobs and other essential services that is envisaged in the Neighbourhood Area. In Rural Villages such as Houghton, Local Plan policy COM2 provides that development within the settlement boundary will be windfalls, rural affordable housing sites, replacement dwellings, community-led development, small business uses, and the re-use of buildings. Development in the countryside outside the Houghton settlement boundary is to be limited to replacement dwellings, the re-use of buildings, rural affordable housing sites, community-led development, employment sites in the countryside, and small business uses.

Not all of these forms of development will occur in the Neighbourhood Area. There are no proposals for community-led development in the Neighbourhood Plan and no existing employment sites in the countryside. The 2018 Housing Needs Survey identified only two respondents wishing to remain in the parish and requiring affordable housing, insufficient local need to justify a rural affordable housing scheme. Of the remaining potential forms of development either in the settlement boundary or in the countryside there is no evidence that any will be undermined by the Local Green Space (LGS) designations proposed under policy HTN8. Only three of the proposed LGSs are inside the Houghton settlement boundary; all are small areas of green space. One of these is the established Houghton recreation ground. Windfall development on the others (LGS2 and LGS6 Houghton allotments) would be restricted by policy HTN8 but this does not amount to undermining the aim of identifying sufficient land to meet identified development needs. This is because windfalls or small business uses, permissible under policy COM2, could still come forward on other land within the settlement boundary which is sufficiently extensive to enable suitable opportunities. Two recent planning decisions in Houghton by the Borough Council further illustrate the local context:

- Planning permission for the residential development of LGS3, land outside the Houghton settlement boundary, was refused on 25 August 2021 (LPA ref 21/01960/FULLS), the decision notice characterising the proposal as unjustified development in the countryside.
- Planning permission for the residential development of LGS6 was refused on 28 September 2021 (LPA ref 21/01959/FULLS) for reasons which included the harm that would result to the community in health, social and amenity terms from the loss of the allotments. The Planning Committee gave this factor significant weight in the planning balance concluding that it outweighed any general benefit to housing delivery, taking into account that there was no

demonstrable need for market housing in Houghton and that housing land supply in the Northern Test Valley housing market area was significantly above that required by Government.

These decisions show that since housing needs and requirements have been met there is no risk that the proposed LGS designations in or outside the Houghton settlement boundary could undermine the aim of making sufficient provision for such development. In respect of the Houghton allotments the decision shows that the proposed LGS designation is clearly consistent with the local planning of sustainable development, taking into account the social objective, as well as not undermining the aim of identifying sufficient land to meet identified development needs.

**10. Can the Parish Council confirm that all the owners of proposed Local Green Space, as set out in policy HTN8 (page 37) have been advised about the proposed designation?<sup>2</sup>**

HPC response: the Parish Council can confirm this is the case.

**11. In what way are local green space sites LGS5 and LGS9:**

- **demonstrably special to the local community; and**
- **of particular local significance (my underlining).<sup>3</sup>**

HPC response: the Parish Council refers to the NDP Village Survey where 87% of respondents thought it very important that green spaces including LGS5 and LGS9 were protected. Support for the policy of designating and protecting LGS including LGS5 and LGS9 can also be seen in the regulation 14 consultation responses and particularly in those at regulation 16. Here, there were 14 individual and household representations from the local community in support of all the proposed LGS with a further representation referring specifically to LGS5, 8 and 9. This is a significant level of support which demonstrates that all the proposed LGS are special to the local community and that they are clearly seen as of particular importance.

The representations generally refer to all the proposed LGS because the local community recognises their overall and cumulative contribution to the dispersed, rural and linear character of the village. Representations also recognise the extent to which development has recently taken place, particularly at the southern end of the village including at Houghton Farm and land south of LGS9, and wish to protect remaining green spaces. The Parish Council considers that LGS5 and LGS9 make a particularly significant contribution, alongside the other proposed designations in this regard. This is because of their strategic location in the centre of the village alongside the road and separating groups of dwellings. Here, they make their own individual contribution to the dispersed pattern of development and village character, whilst forming part of a sequence with other green spaces opposite and to the north and south. Further detail on the particular local significance of LGS5 and LGS9 is set out in Appendix A using the descriptors referred to at NPPF paragraph 102b.

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<sup>2</sup> PPG Reference ID: 37-019-20140306.

<sup>3</sup> NPPF, Paragraph 102 b).

**12. Paragraph 17.19 (page 38) confirms that in the opinion of the Parish Council none of the proposed areas of LGS are ‘extensive in area’.<sup>4</sup> In its assessment of these areas how was ‘extensiveness’ measured?**

HPC response: there is no definition of ‘extensive in area’ in the NPPF. Planning Practice Guidance confirms there are no hard or fast rules about how big a LGS can be; places are different and a degree of judgment will inevitably be needed (Planning Practice Guidance ID: 37-015-20140306). The Parish Council has accordingly assessed the proposed areas of LGS by reference to their village and landscape context and character. All of the proposed LGS designations have boundaries to the built form of the settlement and/or to natural features, particularly to the River Test which delineates the eastern boundary to five of the proposed LGS. This ensures their local character. It is noted that larger areas of LGS than are proposed at Houghton have been confirmed in other Neighbourhood Plans, following application of the approach that their extent is a matter of landscape context and character rather than size per se. The Chilbolton Neighbourhood Plan has a 19.4 ha. LGS (LGS1 Chilbolton Cow Common) and the Upper Clatford Neighbourhood Plan has a 12 ha. LGS (LGS4 flood plain and meadow between the settlement and the Pillhill Brook/River Anton). The largest LGS at Houghton is the 9.5 ha. LGS5 between the village and the River Test.

**13. In policy HTN9 on page 40 (and first bullet point of paragraph 7.25), how will the biodiversity value of land be measured and by whom?**

HPC response: this provision will be implemented initially by the applicant through the preparation of an ecological survey and assessment report by a suitably qualified ecologist to accompany planning applications for development affecting nature conservation sites, habitats and species. Test Valley Borough Council operates a Biodiversity Checklist approach to this effect as part of their local requirements for planning applications. The Checklist for full applications can be seen here: <https://www.testvalley.gov.uk/assets/attach/2358/Biodiversity-Checklist-for-Full-Applics.pdf>. The report would then be scrutinised by the decision-maker alongside other information provided by the applicant.

**14. The monitoring and review of Plans is an important component in the plan-making process, in order to ascertain whether or not the policies are effective and up-to-date. I could find no reference in the HNPD to the monitoring of the policies or to the future role of the Parish Council in this process. Bearing in mind the Local Plan is currently being reviewed, I would welcome the submission of an appropriate paragraph that addresses this issue.**

HPC response: HPC agrees that it is important to monitor both the implementation of the made policies and their continued relevance over time. Planning Practice Guidance indicates there is no requirement to review or update a neighbourhood plan, but factors such as the current review of the Test Valley Local Plan and/or the emergence of new evidence may result in policies in the NDP becoming out of date. In this event, HPC would consider the most appropriate approach to updating the NDP, in consultation with Test Valley Borough Council. To reflect this intention, the following modification is suggested in the form of an additional paragraph to chapter 8 of the Plan:

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<sup>4</sup> NPPF, Paragraph 102 c).

“8.5 The Parish Council will monitor the implementation of policies in the NDP and keep under review the need for the NDP to be amended and updated. Policies in the NDP may be superseded by other development plan policies, such as those arising from the current review of the Local Plan, or by the emergence of new evidence. Where policies in the NDP become out-of-date or new policies are found to be required, the Parish Council in consultation with Test Valley Borough Council will decide how best to update the document.”.

Houghton Parish Council  
6 January 2022

## Appendix A

Table to show particular local significance of LGS5 and LGS9

|   | Beauty   | Historic significance   | Recreational value  | Tranquility  | Wildlife  |
|---|--|---|---|--|---|
| LGS5<br>land between<br>Yew Tree Cottage<br>and Ladymead<br>Cottage | Open character, trees and hedgerows contribute to dispersed, rural and linear character of village. Provides break in development at two frontages located centrally in the village, giving visual relief. | Evidences the historic development of Houghton as a linear Chalk River Valley Settlement alongside the River Test above the floodplain (Middle Test River Valley Floor landscape character area.<br><br>Within Houghton and Bossington Conservation Area, forming an important open area to east of road. | Views across the site towards the River Test and the valley can be appreciated from the village road.   | Quiet and tranquil green space providing breaks in development, so contributing to the dispersed character of the village. | River Test Site of Special Scientific Interest on eastern boundary.   |
| LGS9<br>Land south of<br>Clarendon Way                              | Open character, trees and hedgerow contribute to dispersed, rural and linear character of village. Provides break in frontage development in a central village location, affording visual relief.          | Evidences the historic development of Houghton as a linear Chalk River Valley Settlement alongside the River Test above the floodplain (Middle Test River Valley Floor landscape character area.<br><br>Within Houghton and Bossington Conservation Area, forming an important open area to east of road. | Views across the site towards the River Test and the valley and back into the village can be variously appreciated from the village road, the Clarendon Way public footpath on the northern boundary, and Sheepbridge footbridge to the east. | Quiet and tranquil green space providing break in development, so contributing to the dispersed character of the village.  | River Test Site of Special Scientific Interest to east, separated by an intervening strip of deciduous woodland which is a Priority Habitat Inventory site. |