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Report on Houghton Neighbourhood Development Plan 2020 - 2029

An Examination undertaken for Test Valley Borough Council with the support of Houghton Parish Council on the September 2021 Submission draft of the Plan.

Independent Examiner: David Hogger BA MSc MRTPI MCIHT

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Main Findings - Executive Summary

From my examination of the Houghton Neighbourhood Development Plan (the Plan/HNDP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Houghton Parish Council;
- The Plan has been prepared for an area properly designated – the Designated Area as identified on the plan on page 5 of the HNDP;
- The Plan specifies the period to which it is to take effect – 2020 to 2029; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Houghton Neighbourhood Development Plan 2020 - 2029

- 1.1 Houghton is a small village which lies a few miles to the south of Stockbridge. It is largely linear in form and immediately to the east of the village runs the River Test. The Houghton and Bossington Conservation Area¹ includes the heart of the village, as well as part of the river floodplain and other open land. The character of the village and its attractive setting are clearly of great importance to the local community, and I note that the Vision for the community as set out on page 12 of the HNDP confirms that both the character of the built environment and the distinctive landscape character are both key components that the community seeks to protect and enhance.
- 1.2 There are a number of community facilities which I saw on my visit, including a village hall, a public house, All Saints Parish Church, allotments and a play area. The nearest school is in Stockbridge. The Parish is served by a number of public footpaths, including Monarch Way and Clarendon Way, and I saw that the Test Way runs to the east of the river and is easily accessible from the village.

¹ See page 25 of the HNDP.

- 1.3 The task of preparing a Neighbourhood Plan for Houghton commenced in February 2017. Initial consultation took place over a seven week period (ending on 12 May 2017) and the Steering Group was formed in August 2017. Drop-in sessions were arranged, questionnaires were distributed, a Housing Needs Survey was undertaken, residents' meetings were arranged, and the Parish Council undertook statutory consultation on the draft Plan from 12 April 2021 to 7 June 2021.

The Independent Examiner

- 1.4 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Houghton Neighbourhood Development Plan by Test Valley Borough Council (TVBC) with the agreement of Houghton Parish Council.
- 1.5 I am a chartered town planner and former government Planning Inspector, with extensive experience in the preparation, examination and implementation of development plans and other planning policy documents. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.6 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.7 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.
 - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;

- it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development'; and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

1.8 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.9 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations (under retained EU law);² and
- Meet prescribed conditions and comply with prescribed matters.

1.10 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.³

² The existing body of environmental regulation is retained in UK law.

³ This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of Test Valley Borough Council, not including documents relating to excluded minerals and waste development, is the Test Valley Borough Local Plan 2016.
- 2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 20 July 2021, and all references in this report are to the July NPPF and its accompanying PPG. I have also taken into account the National Model Design Code that was also published in July 2021.
- 2.3 Work is underway on the review of the Test Valley Borough Local Plan and it is anticipated that Regulation 19 pre submission consultation will take place in the fourth quarter of 2023.⁴ I am satisfied that the relationship between the policies in the submitted HNDDP, the emerging Local Plan review and the adopted Development Plan have been given proper consideration by both the Parish and Borough Councils. Subject to the modifications that I recommend, I consider there are no substantive conflicts between the various documents.

Submitted Documents

- 2.4 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
 - the submission draft Houghton Neighbourhood Development Plan 2020 -2029 (dated September 2021);
 - the Map on page 5 of the Plan, which identifies the area to which the proposed Neighbourhood Development Plan relates;
 - the Consultation Statement, September 2021;
 - the Basic Conditions Statement, September 2021;
 - all the representations that have been made in accordance with the Regulation 16 consultation;
 - the undated Strategic Environmental Assessment (SEA) Screening Opinion and Habitats Regulations Assessment (HRA) Report prepared by Test Valley Borough Council, sent to the Parish Council on 23 December 2019; and
 - the request for additional clarification sought in my letter of 8 December 2021 and the responses of 6 January 2022 from both Test Valley Borough Council and Houghton Parish Council.⁵

⁴ See Test Valley LDS, Appendix 1.

⁵ View at: [Houghton Neighbourhood Plan | Test Valley Borough Council](#)
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Site Visit

- 2.5 I made an unaccompanied site visit to the Neighbourhood Plan Area on 15 December 2021 to familiarise myself with the locality, and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

- 2.6 This examination has been dealt with by written representations. No requests to hold a hearing were submitted to me and in any event, I considered a hearing session to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum.

Modifications

- 2.7 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Houghton Neighbourhood Development Plan has been prepared and submitted for examination by the Parish Council, which is the qualifying body for an area that was originally designated by TVBC on 13 June 2017.
- 3.2 It is the only Neighbourhood Plan for the Parish and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2020 to 2029.

Neighbourhood Plan Preparation and Consultation

- 3.4 The Consultation Statement (September 2021) clearly and thoroughly summarises the range of consultation that has taken place. The formation of the Steering Group in August 2017 was followed by two coffee mornings in September and October 2017, at which the purpose of the HNDP and the processes to be followed were explained to local people. To strengthen the evidence base, a questionnaire survey of Parish residents was arranged and a Housing Needs Survey and a Traffic Survey were

undertaken. Further well-advertised residents' meetings took place (March 2019) to report the findings of the survey work.

- 3.5 With the advent of Covid-19 (in line with Government advice) it was decided not to hold a further public meeting. Instead, an invitation was extended to all parishioners (via the Parish Magazine, village e-mail and word of mouth) to review the first draft of the HNDP and provide comments. This was a pragmatic way forward.
- 3.6 I am satisfied that the consultation process has been sufficiently thorough and inclusive, and I am able to conclude that the opportunity to contribute to the Plan preparation process has been available to all the interested parties at the relevant stages, including at both the Regulation 14 stage (12 April 2021 to 7 June 2021) and the Regulation 16 stage (27 September 2021 to 9 November 2021).
- 3.7 I am satisfied that all the relevant requirements in the 2012 Regulations have been met. I also consider that overall, the approach taken towards the preparation of the HNDP has been thorough, fair, proportionate and inclusive. The relevant PPG advice on plan making and community engagement has been heeded and the legal requirements have been met.

Development and Use of Land

- 3.8 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

- 3.9 The Plan does not include provisions and policies for 'excluded development'.

Human Rights

- 3.10 I have seen no evidence that the Plan breaches Human Rights (within the meaning of the Human Rights Act 1998), and it is not a matter that has been raised by any of the respondents, including Test Valley Borough Council. From my independent assessment of the draft Plan and the supporting evidence, I am satisfied that proper regard has been given to the fundamental rights and freedoms guaranteed under the European Convention of Human Rights and that the HNDP complies with the Human Rights Act 1998.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The Neighbourhood Plan was screened for SEA by Test Valley Borough Council (response dated 23 December 2019). The conclusion reached was that because the HNDP would not be likely to have significant environmental effects, an SEA is not required. Having read the evidence I support that conclusion.
- 4.2 With regards to whether or not a HRA is required, I have seen no evidence that would lead me to challenge the conclusion of TVBC that the Plan is not likely to have a significant effect on any European designations.

Main Issues

- 4.3 I have approached the assessment of compliance with the Basic Conditions of the Houghton Neighbourhood Plan as two main matters:
- General issues of compliance of the Plan, as a whole; and
 - Specific issues of compliance of the Plan policies.

General Issues of Compliance of the Plan

National Policy, Sustainable Development and the Development Plan

- 4.4 The policies in the HNDP are set out under four main headings: Sustainable Development; Community; Built Environment; and Natural Environment. The policies are followed by a section entitled 'Delivering the Plan'. The Basic Conditions Statement (September 2021) clearly demonstrates how the policies in the HNDP have had regard to national policies and advice (section 3); contribute to the achievement of sustainable development (section 4); generally conform with strategic policy (section 5); and meet EU obligations (section 6).
- 4.5 Subject to the detailed comments and modifications that I set out below, I conclude that the HNDP has had proper regard to national policy and guidance. I also conclude that, subject to the modifications that I recommend:
- The HNDP is in general conformity with the strategic policies of the Test Valley Borough Local Plan and that, overall, the document provides an appropriate framework that will ensure the satisfactory achievement of the Vision and Objectives of the community (as set out in chapter 3 of the HNDP); and
 - That the policies (as modified) are supported by appropriate evidence, are sufficiently clear and unambiguous and that they can be applied with confidence.⁶

⁶ PPG Reference ID: 41-041-20140306.

Specific Issues of Compliance of the Plan's Policies

Setting the Scene and the Neighbourhood Area

- 4.6 The introductory chapter explains the purpose of the HNDP and the planning policy context within which it has been prepared. It introduces the reader to the community of Houghton and the environment within which it sits, both natural and physical. The key issues to be addressed in the HNDP are succinctly set out in paragraph 2.18.
- 4.7 Plan 4 on page 11 identifies the Conservation Area boundary, listed buildings and scheduled monuments. In the interests of clarity and consistency, it would be helpful to the decision maker if Houghton Lodge Historic Park and Garden were also identified on the Plan, and I recommend accordingly in **PM1**.

Vision and Objectives

- 4.8 Chapter 3 sets out the objectives for the local community and it is clear to me (having read the comments made by local people at various stages in the preparation of the HNDP) that these objectives are an accurate reflection of the aspirations and wishes of the community.

Sustainable Development

[Policy HTN1 - Sustainable Development \(page 13\)](#)

- 4.9 Policy HTN1 confirms that sustainable development proposals will be supported, provided they meet the three requirements set out in the policy. This approach accords with the advice in the NPPF.⁷ In the interests of clarity, it should be confirmed that it is the *achievement* of the stated objectives that is required and that the objectives will be balanced against each other. To that end I recommend **PM2**.
- 4.10 The policy, as modified, will contribute to the achievement of sustainable development and will meet all the other Basic Conditions.

Community

[Policy HTN2 – Community Services, Facilities and Recreational Open Space \(page 14\)](#)

- 4.11 The promotion of healthy, inclusive and safe communities is a key national objective⁸ and in a small settlement such as Houghton it is right that the retention of existing facilities, which are clearly of importance to the local community, should be sought. To make it clear that it is the facilities

⁷ NPPF, Chapter 2.

⁸ NPPF, Chapter 8.

listed in policy HTN2 that should be retained and/or enhanced, I recommend **PM3**.

[Policy HTN3 - Type of New Housing \(page 16\)](#)

- 4.12 The justification for including a policy on the type of new housing that would be acceptable in the village is clearly explained in the supporting paragraphs. However, for the avoidance of doubt and to provide clarity for the decision maker, I recommend in **PM4** that the word 'predominantly' is deleted and that the word 'property', in the third line, is made plural.
- 4.13 There is a reference, in paragraph 5.11, to people who wish to build their own homes but support for this type of development is not included in policy HTN3. To address this matter a modification to policy HTN3 is recommended (**PM5**).
- 4.14 Paragraph 5.10 of the HNBP refers to the 2018 Housing Needs Survey and the last sentence summarises the conclusions of the Survey. However, in the interests of clarity a new sentence should be included which clarifies the situation with regard to the provision of affordable housing and the size of dwellings (in terms of bedroom numbers) that can be achieved. This would most appropriately be positioned at the end of paragraph 5.10, and this is recommended in **PM6**.
- 4.15 I am satisfied that the Community related policies (as modified) have proper regard to national policies and advice and meet the other Basic Conditions.

Built Environment

[Policy HTN4 - Village Design \(page 19\)](#)

- 4.16 Table 2 in the HNBP (page 21) identifies the key characteristics of the village and policy HTN4 seeks to protect and enhance those features. Appendix B of the HNBP lists the design components to be taken into account. Having walked through the village I agree that all the components of policy HTN4 are reasonable and justified. However, under the fourth bullet point on page 21 there is reference to 'Bossington Lodges' and under the fifth bullet point on page 21 there is reference to building styles at 'South End and Bossington'. These locations are not within the Neighbourhood Area and therefore it is recommended in **PM7** that, because of their proximity to the village, they are referred to as design reference points.
- 4.17 The National Design Code (Guidance Notes) sets out 10 characteristics that should be given consideration when planning development, including context, movement, nature, built form, identity and public space. Further advice on design is found in the National Model Design Code. HNBP Appendix B (page 47) repeats much of this guidance and therefore I agree

with the two Councils⁹ that this Appendix should be deleted and recommend accordingly in **PM8**. In light of this modification, the wording of both policy HTN4 and paragraph 6.3 should also be updated to make reference to the National Design Code and Guidance, as set out in **PM9** and **PM10**.

[Policy HTN5 - Houghton and Bossington Conservation Area \(page 23\)](#)

- 4.18 Policy HTN5 addresses both the Houghton and Bossington Conservation Area and non-designated heritage assets within the Conservation Area. There is no plan to identify the location of the aforementioned assets. In the interests of clarity, I suggested to the Parish Council that there should be separate policies in respect of the Conservation Area and the non-designated assets. The Parish Council subsequently provided modified wording and separate policies¹⁰ to address the two issues and I consider that those amendments add clarity to the situation for the decision maker. I therefore recommend the modifications accordingly in **PM11** and **PM12**. I also recommend that a new plan be inserted into the document which clearly identifies the assets which are listed (**PM13**). In this regard, I note that TVBC has offered to assist with the preparation of maps¹¹ and I suggest that, in particular, consideration is given to improving the clarity of Plan 6, including showing the designated Neighbourhood Area.
- 4.19 The modified Built Environment policies will contribute to the achievement of sustainable development and meet all the other Basic Conditions.

Natural Environment

- 4.20 As I saw on my visit, the character of the landscape in the Parish is one of its key assets. Although the valley floor of the River Test is a very significant feature, I consider that the areas of chalk downland to the north and west of the Parish, which include small areas of woodland and hedgerows, also contribute to the attractive character of the local landscape.

[Policy HTN6 - Landscape Character \(page 26\)](#)

- 4.21 Policy HTN6 seeks to ensure that the landscape character of the Parish is protected and where possible improved. To aid the decision maker, I recommend that a cross-reference to Plan 7 (Landscape Character Types) is included within the policy itself (**PM14**).
- 4.22 Requirement 4 of policy HTN6 refers to a landscape scheme being *acceptable*. This could be open to different interpretations and therefore I am recommending, in **PM15**, that the policy be 'tightened up' by the

⁹ See Councils' response to my Question 1 to both Councils.

¹⁰ See Parish Council's response to my Question 5.

¹¹ See TVBC response, dated 7 November 2021.

inclusion of more robust wording, thus facilitating the role of the decision maker.

- 4.23 It is not clear to me what is meant by 'views from outside the Neighbourhood Area' in requirement 9 of policy HTN6 and therefore I recommend, in **PM16**, the deletion of that clause.

[Policy HTN7 - Important Views \(page 31\)](#)

- 4.24 Policy HTN7 includes a list of 18 views that are of importance to the local community. In the interests of clarity, I recommend that the chapter heading, the policy title and the first sentence of paragraph 7.14 all make reference to the views being 'public' in nature (**PM17**).
- 4.25 View 8 (on Plan 8A on page 33) predominantly includes land beyond the boundary of the HNDP and therefore should be deleted (**PM18**).

[Policy HTN8 - Local Green Spaces \(page 37\)](#)

- 4.26 The Parish Council has confirmed that all the owners of the proposed Local Green Spaces (LGS) have been advised about the proposed designation.¹² Objections were submitted at the Regulation 16 consultation stage with regard to the designation of two sites, LGS5 (land between Yew Tree Cottage and Ladymead Cottage) and LGS9 (land south of Clarendon Way).
- 4.27 National Planning Practice Guidance¹³ confirms that the designation of LGS is a way of providing special protection against development for green spaces that are demonstrably special to the local community. Whether to designate land is a matter for local discretion but the designation should not be used in a way that undermines the aim of plan making. There are no specific rules about how big an LGS can be, albeit the NPPF makes clear it should not be an extensive tract of land.¹⁴
- 4.28 It is clear from the Village Survey responses that the protection of green spaces is an important objective for local residents and this support is emphasised in some of the responses at both the Regulation 14 and the Regulation 16 consultation stages.
- 4.29 Houghton is a linear village but there are a few locations where there are comparatively small 'green' gaps separating pockets of development along the village road. I consider that these 'gaps' are an integral part of the settlement character. They add to the beauty of the village, they are tranquil and there is no reason to doubt that they are of value to wildlife.
- 4.30 With regard to site LGS5, it is confirmed by the Parish Council in Appendix C to the HNDP, that the land is 9.5ha in size and that it is of local

¹² See Parish Council's response to my Question 10.

¹³ Open space, sports and recreation facilities, public rights of way and local green space.

¹⁴ Paragraph 102 c).

significance because of its beauty, tranquillity and wildlife. Further justification for the designation of this land as LGS is given in Appendix A of the Parish Council's response to my Questions.

- 4.31 Although there is no public access across the site, I saw on my visit (when I walked and drove along the village road in both directions) that there are a small number of locations along the road where views into the area can be seen and some of the views into the land are identified on Plan 8b in the HNDDP. The land is an attractive and tranquil element in the landscape which makes a valuable contribution to the character of Houghton.
- 4.32 I have given careful consideration regarding whether or not the land constitutes an 'extensive tract of land' and conclude that there is not a 'blanket designation of open countryside' around the village and that site LGS5 is not unduly extensive in size when considered within the overall landscape setting and context.
- 4.33 The owners of two parcels of the land which comprise part of LGS5, confirm that there are no proposals for the development of the site and that the land is protected from development via other means (e.g. it lies outside the Village Settlement Boundary). In these circumstances consideration should be given as to whether or not any additional local benefit would be gained by designation of the land as LGS.¹⁵ The designation of such land is up to 'local discretion' and unlike, for example, the designation of a Conservation Area, the identification of LGS reflects areas of land that are of particular importance to the local community. There are no compelling reasons to disregard the aspirations of the local community and I am satisfied that additional local benefit would be secured by the designation of site LGS5 (primarily because of the contribution the land makes to the character of the village) and that the designation is properly justified.
- 4.34 Turning now to site LGS9, I saw on my visit that the open site provides a break in the frontage development, which is consistent with the overall character of the village. There are clear views across the site, for example from the adjacent public footpath. At the time of my visit, I would describe the atmosphere as tranquil and there is no reason to conclude that the land is not of value to wildlife, bearing in mind the presence of hedgerows and trees and the proximity of the River Test.
- 4.35 The Regulation 16 response (from Strutt and Parker) on behalf of the land-owners includes a number of assertions. For example (in summary) it is concluded that:
- the HNDDP seeks to unreasonably limit the opportunities for future development on land within or adjacent to the settlement boundary and that this, alongside the failure of the Plan to allocate any housing

¹⁵ PPG Reference ID: 37-011-20140306.

- sites (nor set any specific housing target), demonstrates that the Plan does not promote sustainable development;
 - the statement at the end of policy HTN8 regarding the Green Belt is imprecise;
 - the site is not demonstrably special or a parcel of land which 'serves' the community in any meaningful way;
 - the question regarding LGS in the 2018 Village Survey was 'purposely leading'; and
 - the site is in private ownership and is not accessible to the public.
- 4.36 In summary the respondent considers that policy HTN8 lacks justification (and therefore fails to meet the Basic Conditions) and does not meet the tests set out in the NPPF for LGS designation.
- 4.37 With regard to the promotion of sustainable development, I am satisfied that the Test Valley Borough Local Plan currently identifies sufficient land in suitable locations to meet identified development needs. I note that the Local Plan Review pre submission consultation is timetabled for late 2023.
- 4.38 Houghton is identified as a 'rural village' in the adopted Local Plan and no land is allocated for housing or employment in such a location. Any new development would have to be within the settlement boundary or on a rural exception site. Only three smaller areas of LGS are identified within the settlement boundary and on that basis, I am satisfied that the promotion of sustainable development is not undermined by the identification of LGS9, which lies outside the settlement boundary.
- 4.39 In terms of the reference to the Green Belt at the end of policy HTN8, I do not agree that this is imprecise. Planning Practice Guidance¹⁶ makes it clear that the designation of LGS gives the land 'protection consistent with that in respect of Green Belt'. The reference is wholly appropriate, whether or not there is existing Green Belt in the area.
- 4.40 I am satisfied from the evidence before me that this area of land is 'special' to the local community, especially because it contributes significantly to the character of the village. With regard to the question that was posed in the 2018 Village Survey, the opportunity was available for residents to tick the option that confirmed that in their view the protection of the LGS was 'not important' (my underlining). I do not consider, in these circumstances, that the question was unduly leading.
- 4.41 With regard to the last bullet point above, the fact that the land is in private ownership and is not accessible to the public, are not matters for my consideration because they do not run counter to the advice set out in the Planning Practice Guidance.¹⁷

¹⁶ PPG Reference ID:37-020-20140306.

¹⁷ Open space, sports and recreation facilities, public rights of way and local green space.
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4.42 In conclusion on this issue, I am satisfied that the designation of all the areas of LGS in the HNBP are consistent with local planning for sustainable development and that the aim of plan making is not undermined. All the sites are, in my view, in reasonably close proximity to the community they serve; are demonstrably special to the local community and hold a particular local significance; and are local in character and not extensive tracts of land. I consider they should also be capable of enduring beyond the Plan period. Accordingly, the advice in NPPF paragraphs 101 and 102 has been heeded.

[Policy HTN9 - Renewable and Low Carbon Energy Projects \(page 40\)](#)

4.43 Support for renewable and low carbon energy projects accords fully with Government advice and policy HTN9 clearly sets out the Parish Council's approach to this issue. For added clarity I recommend in **PM19**, that, in requirement 1, it is established beyond doubt that the requirement is applicable to proposals for renewable and low carbon energy projects.

4.44 In the interests of clarity and to remove doubt, the sixth bullet point under paragraph 7.25 should make reference to both designated and non-designated assets and I recommend accordingly in **PM20**.

4.45 The policies relating to the Natural Environment, as modified, have proper regard to national policies and advice and meet all the other Basic Conditions.

[Delivering the Neighbourhood Development Plan](#)

4.46 There is no reference in chapter 8 (Delivering the Neighbourhood Development Plan) to the role of monitoring. Whilst there is no specific legal requirement to monitor policies, I consider that it is an important component in the plan making process because otherwise there is the risk that the policies become out-of-date and of little value. This may be the case at Houghton because the Test Valley Local Plan is currently programmed for review, with Regulation 19 pre-submission consultation expected towards the end of 2023.

4.47 Therefore, with the support of the Parish Council¹⁸ I recommend that an additional paragraph be included in this chapter which addresses the matter of monitoring (**PM21**).

[Policies Map and Other Matters](#)

4.48 The Development Plan (of which the HNBP will become part – if made) must include a policies map which illustrates geographically the policies in the Development Plan. The 'new' policies in the HNBP should (where appropriate) be identified as an integral part of the Development Plan. Although all the relevant information is displayed on a number of plans

¹⁸ See response from Parish Council to my Question 14.

(for example Plan 5: Community services, facilities and recreational open space; Plans 8a and 8b: Important views; and Plan 9: Local Green Spaces) there is no reference to these plans forming an integral part of the Development Plan's Policies Map. I therefore recommend the inclusion of a sentence at the end of paragraph 1.9 which clarifies the relationship between the various elements of the Development Plan (**PM22**). Subsequently the titles of the relevant plans and maps within the HNDDP should include reference to them being part of the Development Plan Policies Map.

5. Conclusions

Summary

- 5.1 The Houghton Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates.
- 5.4 The Houghton Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

- 5.5 The HNDDP is written in a clear and relatively succinct style, with each policy being accompanied by supporting paragraphs which explain the reason for the policy and the evidence used to justify it. It is evident that significant effort has been made (in a comparatively small community) to ensure that all interested parties have been given the opportunity to partake in the Plan preparation process and, consequently, I am confident that the resultant document is one that appropriately reflects the land use aspirations of local people.

- 5.6 Houghton is an attractive village, set within a beautiful landscape and I am confident that the HNBP will assist in the protection of the qualities which are valued by local residents. The Neighbourhood Plan, if made, will become an important component in the Development Plan and will contribute to providing a clear land use policy base for the area.

David Hogger

Examiner

Appendix: Modifications (22)

Note: Additions are shown in bold and deletions are show in strikethrough.

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 11 Plan 4: Houghton and Bossington Conservation Area	Identify Houghton Lodge Historic Park and Garden on Plan 4.
PM2	Page 13 Policy HTN1	Modify the second sentence of the policy to read: In making this assessment, the following objectives will be sought and balanced, as relevant to the proposal assessing the sustainability credentials of a development proposal, the achievement of the following objectives will be sought and balanced against each other, as relevant to the proposal:
PM3	Page 14 Policy HTN2	Modify the first sentence of the policy to read: Development involving the loss of the following community services, facilities and recreational open space, as shown on Plan 5 will only be supported
PM4	Page 16 Policy HTN3	Modify the second sentence of the policy to read: This includes predominantly providing dwellings with 2 and 3 bedrooms to meet the need for smaller propertyies .
PM5	Page 16 Policy HTN3	Add a new sentence at the end of the policy to read: As part of providing a range of housing types, self and custom built dwellings will be supported

		subject to other Development Plan policies.
PM6	Page 17 Paragraph 5.10	Add a new sentence at the end of the paragraph to read: Whilst under local plan policies a scheme of up to 10 dwellings would not be required to provide any affordable housing, unless on a rural exception site, the Housing Needs Survey findings as to the size of dwellings sought locally are relevant and capable of being achieved through a scheme of this size.
PM7	Page 21 Table 2	At the end of the fourth bullet point, clarify the reference to Bossington Lodges: (e.g. The Old School House, The Boot Inn (north wall), and Bossington Lodges – which although outside the boundary of Houghton Parish provide appropriate design reference points); Modify the 'title' of the fifth bullet point to read: Late 19 th Century, 'Arts and Crafts' vernacular revival, estate style (at South End and Bossington, the latter, although outside the HNDP boundary, provides appropriate design reference points):
PM8	Page 47 Appendix B	Delete all of Appendix B.
PM9	Page 19 Policy HTN4	Modify the introductory sentence of the policy to read: Development proposals should protect and enhance the key characteristics of Houghton village as set out in Table 2 and haveing regard to the National Model Design Code

		and Guidance design components identified in Appendix B.
PM10	Page 19 Paragraph 6.3	Replace the last sentence of paragraph 6.3 to read: Appendix B sets out a checklist of design components to be considered when assessing whether development proposals are in keeping with the key characteristics of the village. The National Model Design Code Guidance sets out 10 characteristics that should be given consideration when planning development. These include Context, Movement, Nature, Built Form, Identity, Public Space, Homes and Buildings, Uses, Resources and Lifespan. Further advice is found in the National Model Design Code.
PM11	Page 23 Policy HTN5	Split policy HTN5 into two policies. Terminate the current policy HTN5 after point 3 but make no modifications to the wording. (see PM12)
PM12	Page 23 Policy HTN5	Create a 'new' policy HTN6 using the same list of non-designated heritage assets as currently set out on page 23 to read: Policy HTN6 Non-designated heritage assets in the Conservation Area In considering proposals affecting the following 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:

		<p>[the list of non-designated heritage assets remains unaltered]</p> <p>Note: Subsequent policy and plan numbers will have to change and consequential modifications to the explanatory text in paragraph 6.8 will be required.</p>
PM13	Page 25	Insert a new plan which identifies the non-designated heritage assets as set out in the list in the new policy HTN6.
PM14	Page 26 Policy HTN6	At the end of the introductory sentence in policy HTN6 add: (see Plan 7)
PM15	Page 26 Policy HTN6	Modify bullet point 4 to read: provides for any impacts to be satisfactorily mitigated by a landscaping scheme which is itself acceptable not out of character with the local landscape.
PM16	Page 26 Policy HTN6	Delete requirement 9: 9. does not unduly impact on elevated views from outside the Neighbourhood Area.
PM17	Page 31 Policy HTN7	In the chapter heading, title of the policy and in the introductory sentence of paragraph 7.14, insert the word public before 'views'.
PM18	Page 31 Policy HTN7 Page 33: Plan 8A Page 34: Photos	Delete bullet point 5: View 8: Looking east at Freemantle Farm Delete View 8 from the Plan. Delete photo of View 8 and text: View 8: E at Freemantle Farm
PM19	Page 40 Policy HTN9	Modify the first requirement to read: 1. any proposed use of agricultural land for renewable and low carbon

		energy projects has been shown to be necessary, that
PM20	Page 42 Paragraph 7.25	Modify the first sentence of the sixth bullet point to read: including designated and non-designated heritage assets and their settings
PM21	Page 44 Paragraph 8.4	Add a new paragraph regarding monitoring to read: The Parish Council will monitor the implementation of policies in the NDP and keep under review the need for the NDP to be 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.
PM22	Page 3 Paragraph 1.9	Add a sentence at the end of paragraph 1.9 to read: Plans in this document which form part of the Test Valley Adopted Local Plan Policies Map are: Plan 5 – Community services, facilities and recreational open space Plan 6 – Houghton and Bossington Conservation Area Character Appraisal Map Plan 7 – Landscape Character types

		<p>Plans 8A and 8B – Important views</p> <p>Plan 9 – Local Green Spaces</p> <p>[modify Plan titles accordingly to include the wording 'Policy Map']</p>
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