

## **Thrupton Neighbourhood Plan**

### **Regulation 16 Consultation Response Form**

Please return your completed response form to Test Valley Borough Council via either:

- E-mail: [Neighbourhoodplanning@testvalley.gov.uk](mailto:Neighbourhoodplanning@testvalley.gov.uk) **or**
- Post: Planning Policy, Beech Hurst, Weyhill Road, Andover, SP10 3AJ.

**The consultation ends at Noon on Friday 6 September 2019.**

**Please review the Data Protection section, and sign and date at the end of this response form.**

#### **Guidance Note:**

This response form has two parts:

#### **Part A – Contact Details and Future Notification**

Please provide your personal contact details. If an agent is appointed to represent you, then they would need to provide their full contact details in addition to your Title, Name and Organisation (if applicable). This information is required to enable the Independent Examiner to contact you for further information if required during the examination of the Neighbourhood Plan.

Consultees can request to be notified once Test Valley Borough Council has decided to 'make' the Thrupton Neighbourhood Plan, following the Independent Examination and referendum. This decision is the final statutory stage in adopting a Neighbourhood Plan. Please indicate whether or not you wish to be notified.

#### **Part B – Your representation(s)**

If you are responding using this form, please use a separate Part B form for each different part of the Plan that you respond to (for example, one form per document or per policy).

Please use the table to set out which document and which part of that document your comments relate to. If your comment is on a specific element please set this out in the table. Your comments should then be written in the box – please state if you have included any attachments as part of your comments.

## **Part A – Contact Details and Future Notification**

### **Contact Details**

	<b>1. Personal Details</b> (or Client Details if applicable)**	<b>2. Agent's Details</b> (if applicable)
Title*	Mr	Mr
First name*	Stuart	Steve
Last name*	Mitchell	Lees
Job title (where relevant)		
Organisation (where relevant)	Orchard Homes & Developments Ltd	steveleesplanning ltd
Address*		
Postcode*		
Telephone Number		
Email Address		

\*Please note: these sections must be completed.

\*\*If an agent is appointed, please provide the client's Title, Name and Organisation.

### **Future Notification**

Do you wish to be notified of Test Valley Borough Council's decision to 'make' the Thrupton Neighbourhood Plan? (please tick):

**Yes:**

**No:**

## **Part B – Representation**

Please use a separate Part B form for each document/paragraph/policy that you are making representations about.

<b>To which document does this representation relate?</b>		
(please <b>tick only one document per Response Form</b> and indicate the section / policy number / paragraph number to which your comments relate to)		
<b>Consultation Document</b>	<b>Tick</b>	<b>Section/ Policy/ Paragraph</b>
Thrupton Neighbourhood Plan		
Basic Conditions Statement	√	
Consultation Statement		
Designated Area Map		

**Please write your comments in this box:** *(Continue on next page and attach an additional page at the back of your response if required)*

**Objection**

The examiner considering the TNP and the local planning authority will need to be satisfied that the Basic Conditions requirement of the legislation relating to neighbourhood plans has been met. A Basic Conditions Statement ( January 2019) has been prepared in support of the TNP by consultants. Paragraph 6.2 on page 13 of the document sets out four criteria for assessing conformity of the TNP

Policy EN2 of the TNP is seeking to introduce local gaps under the framework of Policy E3 of the Local Plan which is considered to be inappropriate and not justified. Policy E3 is a strategic policy as set out in Annex A of the Local Plan. The Statement in assessing the issue of conformity compares Policy EN2 with Policy E3 and Policy COM2 of the Local Plan but not with the more relevant Policy E3. It is considered that there is an issue of conformity with strategic policy of the Local Plan which has not been addressed by the Basic Conditions Statement.

This issue of conformity was raised in March 2019 at the previous Regulation 16 Consultation undertaken and it is somewhat surprising that the specific concern relating to Policy EN2 has not been revisited.

Neighbourhood Plans need to satisfy five basic conditions. One of the conditions requires neighbourhood plans to contribute to the achievement of sustainable development. The Statement concludes that the TNP satisfies that test. In respect of new residential development the Statement concludes that Policy HD1 makes a strong positive contribution. However it is difficult to see how the overall conclusion was arrived on the basis of the evidence supporting the TNP and the content of the document itself.

The TNP highlights a number of key issues including; a forecast decline in population by 2021 ref para 2.20, a below Borough average in respect of the population under 39, an increasing percentage of the population over 65 ref para 2.21, a lack of facilities in the parish ref para 7.3 and the high house prices in Test Valley ref para 7.7. see also the SWOT analysis on page 20. The issue of the affordability of housing is supported by TVBC's ward profile which says that the average house price in Thrupton is £411k, an increase of 20% over the last five years and that 38% of households in the parish cannot afford to purchase a property.

In response to these issues the focus of the TNP is on environmental issues; the Vision has a focus on conserving and enhancing the landscape and heritage of the Plan area it has 12 landscape objectives and a number of policies which set out a significant number of constraints to development. In response to the demographic and housing issues the TNP seeks to restrict development to land within the defined settlement boundary. That boundary has in essence been in its current form since 2003/04 with the publication of the Test Valley Local Plan (adopted in 2006) and which has remained much the same in the current adopted local plan. Within that settlement boundary the TNP in para 7.4 has identified only five homes being built in the period 2000-2015.

In respect of new residential development the Statement concludes that Policy HD1 makes a strong positive contribution. Given the very limited contribution that development within the settlement boundary, which is the main source of potential new homes has made over the last 15 years it is difficult to see how that conclusion was arrived.

Sustainable development comprises economic, social and environmental elements. In its current form the TNP, given the lack of positive proposals for addressing the very pressing housing issues is not considered to be achieving sustainable development and fails the Basic Condition test.

### **Data Protection**

**Data Protection:** The comments you submit will be used to inform the Neighbourhood Plan process and will be held for the lifetime of the Neighbourhood Plan. Please note that your comments will **not** be treated as confidential and will be made available for public inspection. However, contact details will not be made public and will not be passed to external parties, apart from the Examiner, without permission. For further information on how we use your personal data please visit <http://www.testvalley.gov.uk/gdpr>

**Please tick the box to confirm you are happy for your comments to be used in this way**

Signed .....S P Lees.....

Date 05.08.19.....

**Please return the completed forms by:**

**Email:**

[Neighbourhoodplanning@testvalley.gov.uk](mailto:Neighbourhoodplanning@testvalley.gov.uk)

**Post:** Neighbourhood Planning, Test Valley Borough Council, Beech Hurst, Weyhill Road, Andover, SP10 3AJ.

**For more information:**

**Telephone:** 01264 368000

**Website:** [www.testvalley.gov.uk](http://www.testvalley.gov.uk).

If you require any assistance in completing this form or require further information, please contact the Neighbourhood Planning team.