

Consultee	Support / object / comment	Section / Policy / Paragraph.	Comments	Thurxton Response
Environment Agency	Comment	Policy EN10	We note the reference in para 5.44 that it is not the intention of the Neighbourhood Plan (NP) to repeal the policies within Test Valley Local Plan relating to flood risk and water management, however, as it currently stand's the wording of policy EN10 is misleading, and not one we could support. In accordance with the National Planning Policy Framework (NPPF) [paragraph 155] inappropriate development in locations at risk of flooding should be restricted. This should be done by directing development away from areas at highest risk (NPPF para. 155) through the application of the Sequential Test (NPPF para. 158). We would suggest that the policy is amended to say something like 'In line with the application of the Sequential Test any future development within the Thurxton area will be directed to the areas at the lowest probability of flooding (Flood Zone 1). Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Sequential Test should be informed by the Local Planning Authority's Strategic Flood Risk Assessment (SFRA) as well as other background documents such as the Council's Strategic Housing & Land Availability Assessment (SHLAA)'. To strengthen the plan further we would suggest that you include a policy which sets out how you will be adapting to and mitigating to the effects of climate change, which you have identified as a threat in your SWOT analysis.	Noted.
Environment Agency	Comment	Policy EN5	A high quality water environment supports wildlife but also provides quality of life benefits and can support local economies including boosting land and property values, agriculture, tourism and recreation. Where it is not properly planned for, new development can increase pressure on the water environment. Where development is properly planned it can provide opportunities to protect and enhance the water quality, amenity and biodiversity within a catchment. Pressures on the water environment arise from point sources, such as waste water treatment works, and diffuse pollution sources such as urban water run-off. Waste water treatment and the quality of the water environment should be addressed in the Local Plan to ensure there is infrastructure to support sustainable growth and ensure there is no deterioration of water quality. We would advise that this policy could be written to differently to seek greater protection of the Pilhill Brook for example: 'Development proposals that would adversely affect the following features of Pilhill Brook will not only be supported subject to the following: A: Development with enhance the features of the Pilhill Brook, landscape character, appearance and setting; B: Development will achieve a Biodiversity net gain; C: Development will not compromise the ability for the headwaters of Pilhill Brook and watercourse the river corridor to function naturally throughout seasonal variations and; D: The water quality of the Pilhill Brook is improved and development does not lead to pollution of the water environment	Noted.
Natural England		EN4	Thank you for consulting Natural England on the Thurxton Neighbourhood Development Plan. Natural England supports the inclusion in the plan of policies to protect and enhance the natural features and sites within the area and the landscape setting of the neighbourhood. We have the following comments on specific policies: Policy EN4: Biodiversity. In the Defra 25 Year Environment Plan, the Government has committed to making sure the existing requirements for net gain for biodiversity in national planning policy are strengthened and the current trend of biodiversity loss is halted. Net biodiversity gain ensures that all residual losses from a development are accounted for and addressed. Each scheme will then provide additional biodiversity gain over and above the residual loss. You may wish to reword this policy to ask all developments to achieve a net gain for biodiversity and wildlife habitats, including buffering and creating links to existing sites.	Noted.
Southern Water	Comment	No Comment	Thank you for your email below inviting Southern Water to comment on the Submission Thurxton Neighbourhood Plan. I confirm we have reviewed the document and have no comments to make. We look forward to being kept informed of the Plan's progress.	Noted.
Hampshire County Council	Support	Objectives LEO13, CIO1, CIO3 and CIO4	The Local Highway Authority supports these objectives.	Noted.
Hampshire County Council	Comment	HD4	The Local Highway Authority would recommend that the word <u>safe</u> is added in relation to access. HCC also recommend that the NP states that <u>new developments should be supported by a Transport Statement / Assessment and Travel Plan to demonstrate that safe access can be provided and that the impact on the development on the local highway network can be mitigated</u> . Any development proposals should look to enhance and or make connections to the existing footways and rights of way network in / around the village and make provision for the use of sustainable modes of transport for local journeys within the village itself. This is also applicable to CIO7.	The Objectives are a historical record of what was agreed with Parishioners through Consultation, from which Policies have been developed. The resultant Policies may be amended but the Objectives are immutable. Safety is always a consideration in Planning Applications and will be dealt with by the normal Planning routine.
Hampshire County Council	Support	CIO5	The local Highway Authority supports this objective and would encourage the School to engage with the HCC School Travel Planning Team.	Noted
Hampshire County Council	Comment	CIO6	The Parish will need to engage with Highways England with regards to the provision of safe crossing places over the A303.	Noted
Hampshire County Council	Support	CIO7	The local Highway Authority agree with this objective and consider that it works in conjunction with Objective HD4 (see comments on Objective HD4 above).	Noted
Hampshire County Council	Support	CIO11	The Local Highway Authority recommend that this should be amended to read as: 'To support any improvements to public transport to and from the Parish, particularly for commuters travelling to work.'	The Objectives are a historical record of what was agreed with Parishioners through Consultation from which Policies have been developed. The resultant Policies may be amended but the Objectives are immutable.
Hampshire County Council	Support	EN7	HCC as the local Highway Authority supports this policy.	Noted
Hampshire County Council	Support	HD6	HCC as the local Highway Authority supports this policy.	Noted
Hampshire County Council	Support	CIO3	HCC as the local Highway Authority supports this policy.	Noted
Hampshire County Council	Support	CIO4	HCC as the local Highway Authority supports this policy.	Noted
Hampshire County Council	Support	CIO5	HCC as the local Highway Authority supports this policy.	Noted
Hampshire County Council	Support	EN9	The Local Highway Authority supports these aspirations which will need to be carefully considered by the local environmental health authority, Test Valley Borough Council and developers. The aspirations match guidance contained in the National Planning Policy Framework (NPPF) as of February 2019, specifically the following policies 103 and 181.	Noted
Hampshire County Council	Support	HD3	Development will need to demonstrate to the satisfaction of the local highway authority that safe access can be achieved.	Noted
Hampshire County Council	Comment	HD4	This policy should reference the need for an appropriate transport assessment to accompany any development proposals submitted to the Local Planning Authority for the local Highway Authority to comment upon.	As this is a requirement of normal Planning Applications there is no need to repeat it here.
Hampshire County Council	Comment	CIO1	Criteria 1b : HCC as the local Highway Authority recommends that should be a definition included within the Neighbourhood Plan of what constitutes an "equally accessible location".	Noted
Hampshire County Council	Comment	General	As a general editorial point HCC note that there is inconsistency in the use of the terms 'ground water' and 'groundwater' throughout the document and this could be remedied.	Noted
Hampshire County Council	Comment	Para 5.38	HCC recommend that the NP clarify the flooding type from Pilhill Brook as surface water flooding and groundwater flooding are already highlighted.	Noted
Hampshire County Council	Comment	Para 5.39	'high' (risk of flooding) is a subjective term – suggest clarification or ideally quantification regarding what this actually means within the document.	Noted
Hampshire County Council	Comment	Para 5.39	Flood zone 2 is defined by the EA as 'between 1:1,000 and 1:100 annual probability of flooding' and flood zone 3 is defined as 'greater than 1:100 annual probability of flooding'. HCC recommend that the existing definitions in this section are amended to reflect this.	Noted
Hampshire County Council	Comment	Para 5.40	HCC as LLFA take this opportunity to ask the Parish Council whether there is an agreement in place with Southern Water regarding the work (tankers) referenced in the NP? If this is the case it should also be clarified as to what level the groundwater needs to reach in order for this work (tankers) to commence under an agreement if that is in place.	Noted. There is no agreement in place.
Hampshire County Council	Comment	Para 5.40	HCC as LLFA recommend that the location of groundwater monitoring sites is highlighted within the NP for reference (if this detail is known).	As LLFA HCC should have informed us of such sites, as presumably they know their location. There are none in the Parish.
Hampshire County Council	Comment	Para 5.40	HCC as LLFA recommend that some weblinks / signposting is included in the NP to the Environment Agency website for monitoring groundwater levels is included for clarity.	As LLFA HCC should have informed us of such sites, as presumably they know their location. There are none in the Parish.
Hampshire County Council	Comment	Map 5	the key on this map should state 'Flood Zone 2' and 'Flood Zone 3' and have an Environment Agency copyright on it. The title should also be changed as it does not show 'flooding', it shows EA Flood zones.	Noted. TVBC will provide the appropriate maps.
Hampshire County Council	Comment	CIO1	Hampshire County Council in its role, as a landowner and service provider, supports the principle of Policy CIO1. The County Council as a public service provider has an on-going need to review and, if necessary, rationalise surplus facilities as part of wider County Council strategies to improve local services in the community. It is considered that the wording of the policy allows sufficient flexibility to secure future improvements to education facilities during the plan period. This requirement is in compliance with paragraph 94 of the National Planning Policy Framework (NPPF.) Where central government funding is not available, the only way that educational improvements can be funded is through developer contributions and through the disposal of surplus land within school sites. As I appreciate you may be aware, the operational needs of the Primary School and its playing field are already protected by the following layers of planning policy and legislation: Paragraph 97 of the NPPF; Sport England's Playing Fields and Policy Guidance; Sport England's policy and associated guidance on planning applications affecting playing fields (March 2018); Section 77 of the School Standards and Framework Act 1998 (as amended). The County Council is only able to promote the disposal of surplus school facilities for alternative development where it can be demonstrated under Section 77 of the School Standards and Framework Act (1998) that the land is surplus to the requirements of both the subject school and other Local Education Authority (LEA) schools within the local area, and that the proceeds from the sale of the surplus land is re-invested by the LEA into education, sport and/or recreational facilities. Section 77 is therefore a process that would be consistent with the intentions of Policy CIO1. As demonstrated above, it may be appropriate for the school expand onto existing playing fields, and therefore Policy CIO1 should clearly support this and can be amended with the inclusion of additional supporting text to clarify acceptable special circumstances (see unique role and function of public service providers and their need for managed change to deliver operational service improvements over the plan period (be effective) Suggested amendment: <b>d) The proposals are part of a public service provider's plans to re-provide or enhance local services in equally accessible locations.</b> Additional supporting text: <b>Section 77 of the Schools Standards and Frameworks Act 1998 sets out strict criteria to control the release of school playing fields for development, including requirements that the proceeds are used to enhance sports and/or education provision. Hampshire County Council may seek the development of school playing fields to rationalise its land holdings as a means of financing recreational and educational improvements.</b>	Noted. However as the School to which this refers is outside of the Parish our Policies can only reflect on the impact within the Parish. Plans to redevelop the School or its facilities will presumably be dealt with when a Planning Application or change proposal is made and will be for the relevant Parish(s) and TVBC to consider within the normal planning framework.
Hampshire County Council	Comment	HD4	Hampshire County Council in its role, as a landowner and service provider, supports the principle of Policy HD4. Notwithstanding support for the policy overall, the County Council is concerned that the draft policy does not meet the tests of soundness as it appears to be omitting non-domestic properties (i.e. school, community buildings) and risks not being effective. The County Council suggests that wording is included to make it clear that this policy applies or not, to non-domestic development and allows for the use of the development to be a material consideration. Or alternatively, there is a specific policy for non-domestic development on this basis. This would prevent any confusion and allow for appropriate development which contributes positively to the character of Thurxton.	Noted. The intent of this policy is that it is universally applicable and does not differentiate between domestic or non-domestic developments.

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National Grid	Comment	General	National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation. An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area. Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.	Noted.
Gladman Developments	Comment	General	This section highlights the key issue that Gladman would like to raise with regards to the content of the TNP as currently proposed. It is considered the requirements of national policy and guidance are not fully reflected in the plan. Gladman have sought to recommend a number of modifications to ensure compliance with basic conditions. Gladman is concerned that the plan in its current form does not comply with basic condition (a) in its conformity with national policy and guidance and is contrary to (d) the making of the order contributes to the achievement of sustainable development for the reasons set out.	In their letter of response to the Regulation 16 Consultation Gladman state that "On the 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework. The first revision since 2012. It implements 85 reforms announced previously through the Housing White Paper. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy. §214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Submission of the TNP ultimately occurred after this date, and the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2018 and corrected in February 2019." They are wrong to state that "the TNP ultimately occurred after this date" and as all their comment is based on a false assumption should be considered inadmissible.
Gladman Developments	Comment	EN3	This policy identifies 15 'important' views which the plan makers consider are important for the setting of Thurxton and, where development proposals should not adversely affect them. Gladman suggests that this is a subjective issue and the policy does not provide support for a decision maker to apply the policy predictably and with confidence. Identified views must ensure that they demonstrate a physical attribute elevating a view's importance beyond simply being a nice view of open countryside. The evidence base to support the policy does little to indicate why these views should be protected, other than providing a nice view of the surrounding fields. Gladman consider that to be valued, a view would need to have some form of physical attribute. This policy must allow a decision maker to come to a view as to whether particular locations contain physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support. Gladman therefore suggest this element of the policy is deleted.	The evidence base includes further details on why each view listed in policy EN3 is recognised as locally important. This evidence is considered to be proportionate for the purposes of the Neighbourhood Plan.
Gladman Developments	Comment	EN3	This policy seeks to designate seven parcels of land as Local Green Space (LGS). In order to designate land as LGS the Parish Council must ensure that it is able to demonstrate robust evidence to meet national policy requirements as set out in the Framework. The Framework makes clear at §99 that the role of local communities seeking to designate land as LGS should be consistent with the local planning of sustainable development. Gladman further note §915 of the PPG (D37-015) which states, §100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name. Designation of LGS should not be used as a mechanism to designate new areas of Green Belt (or similar), as the designation of Green Belt is inherently different and must meet a set of stringent tests for its allocation (§135 to 139 of the Framework).	The Parish Council commissioned an independent assessment of all proposed Local Green Spaces. The results of this assessment are provided in the evidence base. The assessment methodology is based on the criteria for LGS set out in the NPPF and following guidelines as provided by the National Planning Practice Guidance. An appraisal has been made of each proposed LGS to see whether they meet the criteria set in the NPPF. The first stage of the assessment includes consideration of whether a site is an extensive tract of land. There are no hard and fast rules about how big a LGS can be because places are different and a degree of judgment will inevitably be needed. The NPPF is clear that LGS designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. Both LGS6 and LGS7 were considered not to be extensive tracts of land. LGS6 - Mullen's Pond and surrounding fields, is a clearly defined area of wetland and pasture. LGS7 - Land between Coach Park and the eastern footpath, is a clearly defined field with footpath along its eastern boundary. The sites alone, or in combination with other proposed LGS, would not present a blanket designation of the open countryside adjacent to the settlement.
Gladman Developments	Comment	EN3	Gladman do not believe the TNP supporting evidence is sufficiently robust to justify the proposed allocation of fields surrounding Mullen's Pond (LGS6) and land between Coach Park and the eastern footpath (LGS7) as LGS, given their extensive size, commensurate to the discrete elements that the TNP seeks to protect.	LGS6 - Mullen's Pond and surrounding fields were found to be demonstrably special to the community for their wildlife and beauty. The land is home to a range of wetland birds including swans, geese, ducks and other waterfowl. As a result of its wildlife value it has a local designation as a Site of Importance for Nature Conservation (SINC) for its unimproved grassland, wetlands and species. It also contains priority habitats of Purple Moor Grass and Rush pastures and Eutrophic Standing waters. In addition, the site is designated as an Environmentally Sensitive Area (ESA). It was therefore, considered to be demonstrably special for wildlife. LGS7 - Land between Coach Park and the eastern footpath was found to be demonstrably special to the community for its historical value. The land is the site of a Roman villa complex which was excavated and remains of an interesting mosaic found at the site are at the British Museum. The Historic Environment Record for this site lists a vast range of archaeological evidence that has been excavated at the site and archaeological journals and local history accounts of Thurxton reference and highlight its historical importance. In addition, the County Archaeologist considers the site to be of Regional importance. The site is therefore, considered to be demonstrably special to the community for its historical significance. The site is not affected any other designation so it is considered beneficial to designate as LGS in recognition of its historical significance.
Gladman Developments	Comment	EN3	The issue of whether LGS meets the criteria for designation has been explored in a number of Examiner's Reports across the country and we highlight the following decisions: The Sedlescombe Neighbourhood Plan Examiner's Report4 recommended the deletion of an LGS measuring approximately 4.5ha as it was found to be an extensive tract of land. The Oakley and Deane Neighbourhood Plan Examiner's Report5 recommended the deletion of an LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation. The Alrewas Neighbourhood Plan Examiner's Report6 identifies both proposed LGS sites 'in relation to the overall size of the Alrewas Valley' to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha. As highlighted through a number of Examiner's Reports set out above and other 'made' neighbourhood plans, it is considered that LGS6 and LGS7 have not been designated in accordance with national policy and guidance and subsequently is not in accordance with the basic conditions. It should also be noted that the numbering identifying each site in the policy text does not match the numbering in the policy justification.	LGS7 - Land between Coach Park and the eastern footpath was found to be demonstrably special to the community for its historical value. The land is the site of a Roman villa complex which was excavated and remains of an interesting mosaic found at the site are at the British Museum. The Historic Environment Record for this site lists a vast range of archaeological evidence that has been excavated at the site and archaeological journals and local history accounts of Thurxton reference and highlight its historical importance. In addition, the County Archaeologist considers the site to be of Regional importance. The site is therefore, considered to be demonstrably special to the community for its historical significance. The site is not affected any other designation so it is considered beneficial to designate as LGS in recognition of its historical significance.
Gladman Developments	Comment	EN3	Whilst the Parish Council have sought to undertake some form of evidence base it does not overcome the failure to meet the specific policy requirements set out above with regards to the scale of land to be designated and therefore, in particular the 2 proposed designations of land, named above. In terms of meeting the second test there is no evidence base that they are 'demonstrably special to a local community' and with regards to their beauty, are not of any particular scenic quality. In relation to PPG guidance on LGS at criterion c), both proposed LGSs are significant tracts of land which effectively form a buffer between Thurxton and Weyhill. The designation of LGS6 and LGS7 have not therefore been made in accordance with basic conditions (a) and (d). Gladman recommend their deletion as LGS in their entirety.	The Planning Practice Guidance states land can be considered for designation even if there no public access (e.g. green areas which are valued because of their wildlife, historical significance and/or beauty).
Gladman Developments	Comment	HD1	Policy HD1 identifies a settlement boundary for Thurxton (and part of Weyhill) and states that land outside of this defined area, will be treated as open countryside, where development will be carefully controlled. Gladman object to the use of settlement boundaries if these preclude otherwise sustainable development from coming forward. The Framework is clear that sustainable development should proceed. Use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a). As basic condition (a) is currently drafted, this is considered to be an overly restrictive approach and provides no flexibility to reflect the circumstances upon which the TNP is being prepared. Greater flexibility is required in this policy and Gladman suggest that additional sites adjacent to the settlement boundary should be considered as appropriate. Gladman recommend that the above policy is modified so that it allows for a degree of flexibility. The following wording is put forward for consideration:	Rejected. This policy addresses development within the Settlement Boundaries. TVBC Local Plan COM2 applies to development outside Settlement Boundaries.
Gladman Developments	Comment	HD1	"When considering development proposals, the Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they provide: New homes including market and affordable housing; or Opportunities for new business facilities through new or expanded premises; or Infrastructure to ensure the continued vitality and viability of the neighbourhood area. Development adjacent to the existing settlement will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development."	
Orchard Homes	Object	EN3 and Para 5.14	The policy requires development to protect views into and out of the parish. Policy EN3 lists 15 'important views' which are shown on the accompanying maps with supporting photographs and cover an extensive area of the Plan area. As drafted the policy would also apply to other views not listed as EN3.1 is a generic policy and EN3.2 identifies specific views. The description of the views in the Policy are considered to cover a wider area than that implied by the arrows used to locate the views on Map2a eg View 3 looking north west towards Thurxton village. View 4 looking south east towards Amesbury Road, View 7 looking west towards Thurxton village. The supporting text of the TNP does not explain why the selected views are important. The wording of the Policy is such that it could have the effect of finding any development within the area covered the view as having an adverse impact and therefore not acceptable. As presented the policy would appear to apply a blanket policy constraint to much of the countryside within the neighbourhood plan area.	The evidence base includes further details on why each view listed in policy EN3 is recognised as locally important. This evidence is considered to be proportionate for the purposes of the Neighbourhood Plan. Orchard homes have an interest in developing the area Views 3, 4 and 7 cover. The statement "much of the countryside within the neighbourhood plan area" is incorrect as the area covered is only 1/8th of the Parish. See also the response to the Examiner's letter.
Orchard Homes	Object	HD1	Policy HD1 seeks to limit the size of new housing sites (10 dwellings or less) and the size of new dwellings (three bedrooms or less). The justification for the policy ref para 7.6 and to the Consultation Statement is the level of community support for such an approach. Whilst the views of the local community are important the policies of the TNP need to be founded on robust evidence. That is not the case in respect of this policy	The rationale for this policy is outlined in all the supporting text in Section 7 Housing and Design, derived from the Original Parish Survey. No one paragraph should be read in isolation, see the note at the end of Section 1.
Orchard Homes	Object	H1	Policy H1 proposes protection to important open spaces and built and natural features. These are not easily identified and are to be found in a number of separate documents, the Conservation Area Land Appraisal and the Village Design Statement. Where development plan policies relate to specific areas those areas should be identified on a proposals map. It is recognised that including relative small individual features may not be practical but by including the larger areas and features on a map within the Neighbourhood Plan would greatly assist the reader understand the constraints which may apply and enhance the value of the document in the decision making process. As drafted the TNP does not provide the necessary clarity required of a development plan document.	To aid clarity amend "Conservation Area Land Appraisal" to read "Fyfield, Kimpton Thurxton Conservation Policy, TVBC 1985". This Policy, as its title states, deals with the Conservation Area which is mapped on the facing page.
Orchard Homes	Object	EN2 and Para 5.13	The text setting out the justification for Policy EN2 refers to Policy E3 of the Test Valley Revised Local Plan 2016. It implies that the objective of the Local Plan policy is to maintain the identity of settlements by seeking to limit coalescence between settlements across the Borough and can be applied to the parish of Thurxton. That is not the case. Policy E3 of the Local Plan is to be applied to specifically designated local gaps around Andover and southern Test Valley and not borough-wide. Policy E3 of the Local Plan has been identified as a strategic policy by the Borough Council. The TNP is proposing to use it in a form not intended by the policy to identify further local gaps. In that context it raises the issue of conformity of the TNP with the Local Plan. The four settlements to which the TNP policy applies are spread across the parish and as currently drafted the policy is effectively a blanket one restricting development. If the TNP is seeking to introduce a local gaps of its own it would need to justify why land was proposed to be included and to define a boundary.	The note at the end of Section 1, Page 5 highlights the need to consider all elements of the Thurxton Parish NDP and not take any Policy or paragraph in isolation. Paragraph 5.13 therefore should not be considered as the sole justification for Policy EN2. The sentence referencing TVBC Local Plan Policy E3 is factually correct and was used as it reflects the settlements of the Parishioners as expressed in their response to the Parish Survey. Policy EN2 provides a local expression of the principles of Local Plan Policy E3. The intention of the policy is not to create local gaps, rather proposals will be considered on a case-by-case basis with regard to the criteria of Policy EN2. To aid clarity the beginning of the final sentence could be amended to read "This Section likewise contains....."
Orchard Homes	Object	EN1	As drafted the policy requires development to conserve and where beneficial to do so enhance the character and landscape of the parish. In applying the tests of the policy it is difficult to see how the caveat set out in the policy would not be applied in every case as when would it not be beneficial to enhance the character and chalk landscape of the parish. The wording as proposed effectively sets out the test normally associated with development affecting conservation areas rather than as a generic policy to be applied to all development. As drafted it imposes a potentially significant constraint to meeting the current and future housing needs of the parish.	No it doesn't, the three requirements a) - c) are specific.
Orchard Homes	Object	Basic Conditions Statement	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.	Policy EN2 seeks to preserve the locally distinctive settlement pattern of the parish which is a key feature of the landscape and its historical development. The first criteria of the policy seeks development to be within the settlement boundary. This is in line with Policy COM2 of the Local Plan. The policy also provides a local expression of the principles of Local Plan Policy E3 such that development should not, individually or cumulatively with other existing or proposed development, diminish the physical and visual separation of four settlement areas of Thurxton Parish. It does not create local gaps. Therefore it is agreed that in terms of the general compliance with the Local Plan, Policy E3 could be added to the Basic Conditions Statement.

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Orchard Homes	Object	Basic Conditions Statement	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 Thurxton 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.	There are a number of confusing and in some instances incorrect generalities in this response. It is not the purpose of this Neighbourhood Development Plan to set out proposals for development rather it is to establish the requirements of the community in support of the Local Area Plan. Is this response really addressing the Basic Conditions Statement or is it just non specific winge?
Orchard Homes	Comment	Consultation Statement	The Consultation Statement include a number of reference to the Regulation 14 submissions which are not accurate. Outside Agencies Comment: P13, Orchard Homes is quoted as seeking details of proposed development sites. The Regulation 14 submission did not include such a request. Policy EN1 - The submission on behalf of Orchard Homes is not recorded in the Consultation Statement. Policy EN2 - The Consultation Statement incorrectly summarises the Regulation 14 submission. In respect of the approach the submission by Orchard Homes suggested that the draft TNP in respect of the policy would benefit from a detailed analysis of the areas which were most sensitive in terms of retaining settlement character and to identify them rather than the blanket approach proposed.	Orchard Homes in its response to Regulation 14 Consultation said "Where development plan policies relate to specific areas those areas should be identified on a proposals map" this was understood by the SG to be seeking detail of "proposed" development sites. This was deemed not applicable, as the NDP does not propose any. The Consultation Statement is a summary of the main issues and concerns raised. It is not the purpose of the Consultation Statement to detail every one of the over 360 comments submitted by Parishioners and over 400 submitted by other agencies. The NDP Steering Group (SG) considered, at length, every comment made by Parishioners and other agencies to determine the validity of the comment and if amendment of the draft NDP was required. This has been stressed throughout the continued consultations by the SG. The Consultation Statement adequately summarises the SG understanding of the submission in respect of Policy EN2 (see the specific response to EN2 queries above).
Test Valley Borough Council	Comment	para 1.4	The plan should have a 15 year time horizon, therefore the plan will need to run until 2034.	Why? Where is this need established? See the TVBC response to the Examiner's letter.
Test Valley Borough Council	Comment	Chaper 3	This section could be slimmed down in the final version, but has been appropriate in the consultation documents so that the community are aware of the extensive consultation undertaken.	As the Plan is to have a lifespan of 10 or 15 years it is important that its basis is recorded for future readers who have not been party to its genesis. It is also important to show the extent of consultation during the Plan's development
Test Valley Borough Council		LE06	This could be achieved by designating the land as a Local Green Space Designation if the land in question meets the criteria.	
Test Valley Borough Council		LE012	This might be better worded as 'To conserve the natural water sources within the plan area'	
Test Valley Borough Council	Comment	LE07 LE010 LE011	I understand what these objectives are seeking to achieve, but they are not a land use planning matters. They would be better suited in the community projects and aspiration chapter.	
Test Valley Borough Council	Comment	HO1	The Adopted Local Plan addresses this issue and therefore does not need repeating in the plan.	
Test Valley Borough Council	Comment	HO2	The lifetime homes standard is no longer in force, and therefore references to this should be deleted.	The Objectives are a historical record of what was agreed with Parishioners through Consultation from which Policies have been developed. The resultant Policies may be amended but the Objectives are immutable.
Test Valley Borough Council	Comment	HO3	The text 'new homes .....to ... environment' is more suited to a design policy, and not the overarching objective, and should be deleted from the objective.	
Test Valley Borough Council	Comment	HO4	This level of detail would be covered in a planning application, and does not need repeating here. Landscaping and landscape character are two separate considerations. This could be incorporated into HO3 with the addition of 'and natural environment' to the objective.	
Test Valley Borough Council	Comment	CIO2 to CIO11	I understand what these objectives are seeking to achieve, but they are not a land use planning matters. They would be better suited in the community projects and aspiration chapter.	
Test Valley Borough Council	Comment	para 5.3	A map here showing the SINCES would be helpful.	No, see pages 32 and 33.
Test Valley Borough Council	Comment	para 5.10	A map showing the character areas would be helpful. TVBC can assist with mapping for the plan.	Agreed. At the time of writing these were undergoing revision see Paragraph 5.10. TVBC can provide suitable maps.
Test Valley Borough Council	Comment	para 5.11	As a planning authority we are unable to insist that all proposals have a LVIA, therefore suggest adding the words 'where required'	Agreed.
Test Valley Borough Council	Comment	Policy EN1	Suggest rewording the policy to 'Landscape' as this policy is principally about the landscape.	Agree.
Test Valley Borough Council	Comment	para 5.13	<i>forms part of the setting of the settlement and development at these locations is likely to be sensitive with regard to settlement identity and real or perceived diminishing of settlement separation.</i> 'What is the evidence to support this statement?	See the Survey and all other Parishioner consultation returns.
Test Valley Borough Council	Comment	Map 2 a and b	Map 2a and b could be consolidated into one map. TVBC can assist with the mapping in the final document.	They could, but as these maps have been the subject of criticism for being too generalised reducing the scale would exacerbate that issue.
Test Valley Borough Council	Comment	EN4	The content of Policy EN4 is already covered in the NPPF and therefore does not need to be repeated in the NP. However, parts of the policy text could be moved into the supporting text	NPPF paragraphs 174 -177 deal with this aspect but it is believed to be important to protect the PC from grandiose schemes which leave the Parish with a bill to pick up for maintaining them. Hence EN4 3 is essential.
Test Valley Borough Council	Comment	para 5.23	A map would be helpful to show the trees with TPO's TVBC can assist with the mapping in the final document.	Given the duration of the Plan and the propensity of trees to die or fall down any map of current TPOs would soon become redundant. Developers should be capable of researching relevant TPOs and the PC must be aware of all applicable TPOs when considering planning applications.
Test Valley Borough Council	Comment	para 5.26	what is the evidence that these are suitable native trees? Are these compatible with the Landscape Character areas ?	This list was suggested by SODPA. Policy EN1 covers the choice of trees suitable to the Landscape Character.
Test Valley Borough Council	Comment	EN7	Policy EN7 mostly repeats the adopted local plan policy E6 and since there are no locally distinctive elements to the policy, I recommend that the policy be deleted. The supporting text could refer to policy E6 and its requirements.	This supports Objectives LE05, CIO4 and CIO6 and provides a local context in support of TVBC Local Plan E6.
Test Valley Borough Council	Comment	EN8	The NPPF sets out the circumstances that LGSD can be developed and does not need repeating in the policy.	This Policy again gives a local context to the very much broader wording of the NPPF.
Test Valley Borough Council	Comment	map 4	The designations on the maps could be clearer. TVBC can assist with the mapping in the final document.	Noted.
Test Valley Borough Council	Comment	EN9	Criterion 3 and 4 of policy EN9 are detailed matters for consideration as part of any planning application and therefore do not need to be repeated in the NP.	Where do they appear in the Local Plan? Policy E8 deals with the pollution after development has taken place. Leave as is unless better evidence of duplication is available.
Test Valley Borough Council	Comment	map 5	The key to the map requires updating with the relevant Flood Zones of 2 and 3. The OS copyright is that of TVBC and will require updating with the parish OS number. TVBC can assist with the mapping in the final document.	Agreed TVBC will supply the required maps.
Test Valley Borough Council	Comment	EN10	Qualifying proposals in Flood Zones 2 and 3 will have meet the sequential and exceptions tests as set out in national policy, and therefore do not need to be repeated here. The text of the policy could be moved into supporting text	Are SuDS included in the NPPF in this context? For example run off from the field at the eastern end of Lambourne Close into Mullen's Pond would be unacceptable.
Test Valley Borough Council	Comment	Para 6.5	The LGS and the CA could be shown on the same map. TVBC can assist with the mapping in the final document.	Keep as is because the relevant map is immediately adjacent to the relevant Policy.
Test Valley Borough Council	Comment	para 6.7	The LB could also be shown on the same map. TVBC can assist with the mapping in the final document.	The CA document lists them and maps them. As the CA document must be referred to in planning considerations it is more than adequate that it remains there.
Test Valley Borough Council	Comment	Policy H1	Criterion C - amend wording to read: 'The use of <i>traditional locally distinctive materials</i> such as chalk (cob), flint, brick or rendered walls with thatch or slate roofs and <i>traditional</i> boundary features such as thatched or tiled topped Hampshire walls will be encouraged. <i>as will appropriate innovative and contemporary design</i> .' Providing a proposal meets the criteria in the policy, then the design could be traditional or contemporary design.	It does no harm to spell it out. The "contemporary design" aspect was added as a result of Parishioner consultation and was agreed to be significant enough to be included in the NDP. Agree to the "locally distinctive" amendment.
Test Valley Borough Council	Comment	Map 6	Listed buildings should be added to this map. 'Parish boundary' should be replaced with 'Plan Area' TVBC can assist with the mapping in the final document.	Agreed, depending on the extent of necessary revision of the Plan and the improvement that could be made.
Test Valley Borough Council	Comment	Para 6.10	The SAM could also be shown on Map 6.	Agreed, depending on the extent of necessary revision of the Plan and the improvement that could be made.
Test Valley Borough Council	Comment	Policy H3	This should be re titled as 'Non Designated Heritage Assets' as this is what the policy is identifying. The text at the beginning of policy H3 repeats the requirements of the local plan policy E9, and do not need to be repeated. Paragraph 6.11 could refer to Local Plan policy E9 as being of relevance to these assets.	Agree the title should be "Designated Heritage Assets". The introductory text to Policy H3 is phrased to ensure that developers make themselves fully aware of the importance of the Designated Heritage Asset before proposing any change that would affect it.

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Test Valley Borough Council	Comment	para 7.8	Removal of PD rights - What is the evidence to support this? Is this justified?	The evidence is the view expressed by Parishioners requiring development of: a) smaller house that are affordable to downsizing residents and/or first time buyers b) Affordable Housing as set out in the NPPF. Parishioners wish to retain these in perpetuity to avoid over "gentrification" and keep a balanced demographic for the Parish.
Test Valley Borough Council	Comment	HD1	The 10 or fewer dwellings in the policy would be difficult to justify, as within the settlement boundary, there is a presumption in favour of development, regardless of the number of homes proposed.	The 10 or fewer is a Parishioner express requirement.
Test Valley Borough Council	Comment	para 7.11	This approach is not supported by planning case law on annexes.	
Test Valley Borough Council	Comment	HD2	criterion d) should be removed as this approach is not supported by planning case law on annexes.	Case Law needs to be understood.
Test Valley Borough Council	Comment	HD4	Bullet 2 in policy HD4 is a requirement for planning applications and does not need to be repeated in the policy. For clarity, it could be added to the supporting text	Accepted.
Test Valley Borough Council	Comment	HD6	Bullet 1 amend <del>strongly resisted</del> with <b>will not be supported</b> . The parking standards in Policy HD6 are higher than those set out in the Adopted Local Plan. What is the evidence to support these higher standards? The majority of the text of the policy is covered in Local Plan policies T1 and T2, and does not need to be repeated in this plan. The parking standards in the local plan are minimum standards, therefore any new development can propose more parking that the policy dictates or less, if supported by evidence.	Bullet 1 amendment accepted. As parking is a major issue in Thurxton Village this Policy has been worded to prevent its exacerbation. One bed properties are as likely to house 2 persons as one. Due to the poor public transport through the Parish and to avoid further exacerbation of on street parking a higher standard than the LP is required. See also response to Examiner's letter.
Test Valley Borough Council	Comment	para 7.18	Lifetime home standards are no longer in force and so reference to this should be deleted.	Agreed.
Test Valley Borough Council	Comment	HD7	2.Sheltered or purpose built housing for the elderly, <del>on a limited scale</del> , and with a preference for those with local connections ( <del>ie currently living in the Parish or with children closest living relative living in the Parish</del> ) will be viewed favourably. 3.All new Ddwelling designed to should be suitable for <del>elder</del> all residents <del>must demonstrate</del> and as a minimum, that they meet Building Regulations requirements M4(2) for accessible and adaptable dwellings. <del>These dwellings will also be suitable for younger residents and are not intended to be re-occupied in use.</del> How is 'limited scale' defined? The definition of those with a local connection is determined through the allocations policy and does not need to be repeated here. The policy is applicable for all members of the community, and therefore does not only apply to older residents	Amendment to 2. and 3. accepted.
Test Valley Borough Council	Comment	para 7.19	What is the evidence for 5 dwellings or less? A rural exceptions scheme will require a housing needs survey which will help determine the number of affordable homes required.	Noted. Origin of 5 dwellings or less to be investigated.
Test Valley Borough Council	Comment	HD8	Policy HD8 repeats local plan policy COM8 and does not need to be repeated in this plan. The text from the policy is already in paragraph 7.19 which explains the situation.	Agreed.
Test Valley Borough Council	Comment	para 8.4	bullet 6 <i>Water resources within Test Valley are largely identified as having restricted water available and only at moderate and low flow.</i> What is the evidence for this?	From published papers, for example <i>The allocation of water resources in Hampshire as a whole, and the Test Catchment in particular, is of considerable concern.</i> " extracted from the NRA "River Test Catchment Management Plan" 1991. More recently <i>"CPRE Hampshire has been following SW's water resource management plan for several years now and we are still gravely worried. The Western area ( mainly Test Valley) is still profoundly short of water."</i> is an extract from the CPRE Report on the Southern Water and Portsmouth Water stakeholder meeting July 2019.
Test Valley Borough Council	Comment	C11	The first half of the policy repeats Local plan policy COM 14, and therefore does not need repeating in this plan.	COM14 a) to c) deals with the loss of shops and public houses d) and e) deal generally with community facilities and places of worship. The NDP Policy C11 is more specific to the context of the Parish.
Test Valley Borough Council	Comment	C12	A proposal for a new community facility would be assessed against Local Plan Policy COM 2 and if the proposal met the criteria, COM9. Impacts of proposals on residential amenity are addressed in Local Plan policy LHW4 and therefore these matters do not need to be repeated here.	Policy C12 addresses new community facilities specifically within a local context. COM2 deals with Settlement Hierarchy and Com 9 deals with Community Led Development which is not what Policy C12 addresses.
Test Valley Borough Council		C13	Policy C12 repeats local plan policy COM15 and does not need to be repeated in this plan	See above.
Test Valley Borough Council		C15	What is the evidence for the parking stress in the 3 areas outlined in the policy	Observation by Parishioners, School drop off drivers, Hall users and lorry drivers forced to turn their vehicles around in the dead of night much to the annoyance of residents (myself included). Parking was a major issue raised by the responses to the Parish Survey.
Test Valley Borough Council		C16	Bullet 2 of the policy is negatively worded and should therefore be removed	8.11 and the two elements of Policy C16 are fundamental to what the NDP strives for. The Vision for the Parish in Section 4 Page 21 and the objectives set out what was desired by Parishioners. The juxtaposition of Policy C16 1. and 2. is deliberate and is intended to make the view of the Parish crystal clear.
Test Valley Borough Council		EC1	Add <b>'accord with the development plan policies and that they:'</b> for clarity.	See the note below 1.9, Page 5
Test Valley Borough Council		para 10.2	and note in para 10.3. A list of important trees in the plan area is a good idea. However, there are criteria that need to be met in order for a TPO to be made, and this includes the tree in question being under threat. Therefore I recommend that the text in relation to TPO's should be deleted. If the Parish hold a list of important trees with an assessment of their importance, this could help if a tree did come under threat and could be used as evidence of its importance.	Para 10.2 at the end of the first sentence after "these" add "if they come under threat". Important trees are marked in the Conservation Area document but this has not been successful in giving the protection some residents desire. If the PC has completed the work described in Paragraph 10.2 at the time of the next revision of the NDP a list could be beneficially included as suggested by TVBC. Paragraph 10.3 at the end of the second line delete the "s" at the end of "requirements".
Test Valley Borough Council		para 10.6	Hampshire County Council have a Superfast Broadband Programme being rolled out across the county, which could also be referred to.	Para 10.7 not 10.6 the suggestion adds nothing.
Test Valley Borough Council		Appendix 1	Photographs of the assets would be helpful.	Agreed for the majority if householder/landowner permission is granted and time permits.