



Wellow Neighbourhood Plan

Site Options and Assessment Final Report, AECOM, May 2021

Explanatory Note

Issued: 20221021

Introduction

This explanatory note has been issued by the Wellow Neighbourhood Plan Steering Committee to assist the reader in their understanding of the AECOM report on Site Options and Assessment. Accompanying the AECOM report is an addendum issued by the Steering Committee; this note explains why this was necessary. Both the addendum and this note need to be read in conjunction with the AECOM report.

Use of consultants AECOM

Early in the development of the Neighbourhood Plan, an internal team appraised sites based on those put forward in 2017 to Test Valley Borough Council by landowners and developers under the SHELAA¹ programme (see below for further information). This provided useful information on the sites but the appraisal was not to an accepted methodology recognised by government or Test Valley Borough Council.

The Steering Committee agreed that a more objective and independent site assessment based on a standard methodology was required. An application was made to Locality² for technical support in site assessment. This support is provided free of charge. Locality use the consultants AECOM and thus they were employed to do the assessment with support from the Steering Committee.

Status of this report

As is made clear in the Disclaimer to the AECOM report on page 2³,

- The document is intended to aid the preparation of the Neighbourhood Plan
- It can be used to guide decision making
- It is not a policy document
- Acting as the “Qualifying Body”, neither the Steering Group nor the Parish Council are bound to accept its conclusions

We were able to comment on the draft report which went through several iterations. However several residual errors and issues remained which we were unable to correct or clarify before AECOM issued their final version. We have addressed these by issuing an

¹ SHELAA Strategic Housing and Economic Land Availability Assessment (SHELAA) - see [Test Valley Borough Council SHELAA](#) for further details.

² An organisation used by the Ministry of Housing Communities and Local Government to support neighbourhood planning see: <https://neighbourhoodplanning.org/>

³ Unfortunately, the report was issued without page numbers by AECOM, the page numbers in this report are as indicated by the Adobe Acrobat Reader



addendum and added locally specific information that AECOM operating nationally were not necessarily aware of.

Housing allocations

In the Executive Summary of the AECOM report (page 5), it states:

“The Parish Council is seeking to explore housing allocations in the Neighbourhood Plan to meet an estimated housing need of approximately 50 homes which is still to be qualified through a Housing Need Assessment.”

Things have moved on since this was originally written, we have completed a Housing Needs Survey and Assessment⁴. Together these documents highlighted a need for 58 houses to be built in the Parish between the Test Valley Local Plan dates of 2011 to 2029. To put this into context, a minimum of 648 homes (36 per annum) are to be brought forward in the rural area of Test Valley Borough (within which Wellow Parish lies) in the Local Plan period. The Local Plan indicates that around a third of houses built over the Plan period should be affordable housing although there is no specific allocation to the rural parishes.

No housing is planned in the New Forest National Park area within the Parish, the Park has its own Local Plan, quite separate from that of Test Valley Borough Council.⁵

At the time of the Housing Needs Assessment in early 2021, there had already been 36 houses built in the Parish, or given planning permission⁶, since 2011. Therefore to meet the housing requirement by 2029, we only need to find a site or sites for 22 more houses. Each time another site is granted planning permission, this number reduces.

Again in the Executive Summary of the AECOM it states,

“Adopted Local Plan policy dictates that development outside the existing settlement boundaries would be limited to Rural Exception Sites (for affordable housing), community led development and other limited uses. In order to allocate any of the identified sites for development, the settlement boundary would need to be redrawn either through the Neighbourhood Plan or a revised Local Plan. Therefore any Neighbourhood Plan policies would need to be in conformity with this policy and it is possible that the target of 50 homes cannot be met.”

The conclusions to all the sites rated as potentially suitable if issues can be resolved (the amber sites) are consistent with this. For example, the amber sites are typically stated to be:

“potentially suitable for a limited amount of rural exception housing (affordable housing) or community led development”

⁴ Summary available at: <https://www.wellownhp.org.uk/wp-content/uploads/2021/06/HNA-SUMMARY-v07-final.pdf>. The Housing Needs Assessment follows a methodology accepted by Neighbourhood Plan Examiners.

⁵ See: <https://www.newforestnpa.gov.uk/planning/local-plan/>

⁶ This number only includes new-builds, it does not include replacements where a house is demolished and rebuilt on the same site.



Nothing is said about market housing because all the sites are outside the designated settlement areas⁷. There are some elements of the AECOM report which have unfortunately caused some confusion, particularly the conclusions for each site. Whilst the summary states the overall position, we feel it is worth reiterating how any Neighbourhood Plan housing allocations will have to comply with Local Plan policy:

- The current Local Plan allows for housing development within the settlement boundary. These can take the form of ‘windfall’ sites which are essentially all unexpected new development within a settlement area. It also includes replacement dwellings and conversion of existing buildings.
- Anything outside the settlement boundary needs to be either a rural affordable housing site (also referred to as a rural exception site) or a community led form of development (see Local Plan Policy COM2⁸)

A rural exception site⁹ can have a very small number of open market dwellings to make a scheme viable, equally any open market housing proposal with ten or more dwellings¹⁰, must contain a proportion of affordable dwellings. The AECOM report looked at housing in general terms.

As AECOM point out (see quote above), unless the existing settlement boundaries are changed by Test Valley Borough or in the Neighbourhood Plan, our housing proposals would have to be community led developments or through a rural affordable housing site to comply with the current policy.

Methodology

As stated in the AECOM report, the approach to the site assessment was based on the Government’s Planning Practice Guidance¹¹ supplemented by Locality’s Neighbourhood Planning Site Assessment Toolkit¹². (Test Valley also have a methodology which is very similar in approach but varies in certain minor details.¹³)

Identification of sites to be included in assessment

Paragraphs 3.2 to 3.6 of the AECOM report (page 9) gives some details of how the sites to be included in the Assessment were identified. Information available from Test Valley Borough Council was used. Their biannual call for sites forms the basis of their Strategic Housing and

⁷ There are three settlement areas in Wellow Parish, West Wellow, School Road and East Wellow.

⁸ See <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/local-development-framework/dpd> to access the Local Plan. COM2 relates to the settlement hierarchy and what development is permitted in rural villages and the countryside.

⁹ Small sites used for affordable housing not normally available for housing. They seek to meet the needs of the local community by accommodating current residents or who have an family or employment connections.

¹⁰ The AECOM report states incorrectly that this has to be five or more houses, this is incorrect – see Addendum

¹¹ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

¹² <https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/>

¹³ <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/neighbourhood-planning/neighbourhoodplanning>



Economic Land Assessment (SHELAA) reports¹⁴. The sites include those promoted for housing and economic development by landowners and developers. The inclusion of the site in the SHELAA carries no implication that Test Valley Borough Council would grant planning permission.

Each of the sites in a SHELAA report carries a standard site description giving details of the site, constraints, proposed development and a summary of the likely suitability of the site based on the Test Valley methodology cited above.

The New Forest National Park undertake a similar exercise to Test Valley Borough Council but no sites in the Parish within the National Park were identified by the Park authority as having development potential (paragraph 5.3 of the AECOM report page 18 refers).

The Parish did not issue a separate “call for sites” but used the Parish website to encourage local landowners to submit any sites they wished to promote for development to Test Valley Borough Council for inclusion in the SHELAA.

The final AECOM report carries assessments of 20 development sites chosen in agreement with AECOM. These included those assessed within Wellow Parish in the TVBC SHELAA reports for 2017-2018 and 2019-2020. One site from the 2017-2018 SHELAA, site 222, was not assessed because the Steering Group learnt that this was no longer going to be promoted and had been withdrawn. A very small site 117 on the A27 was also not assessed. The other 2017-2018 SHELAA sites which were not promoted again in 2019-2020 but were situated in a strategically important gap, the so-called “Wellow Lung” were retained in the list to be assessed.

Originally 19 sites were considered. During the assessment, it was agreed with AECOM to divide SHELAA site 16, Pottery Farm and assess each part separately. From the 2018 residents’ survey, it was clear that the majority of those responding (81%) strongly favoured smaller sized developments of less than 10 houses. Site 16 is split into two parts by School Road and the public right of way. That to the east (identified in the AECOM report as 16b) is smaller in area (3.3 hectares) and has different constraints¹⁵.

One site, SHELAA site 257, was promoted for economic (business) development, two other sites, 228 and 229, were promoted for mixed development – economic and housing, all the other sites were for housing.

As stated earlier, all the sites identified are outside the designated settlement areas, no sites within the settlement areas were promoted which is unsurprising since the settlement boundaries are so tightly drawn that there are no sites of any extent available.

After the site assessment process was underway and with the initial AECOM assessments in draft form, the Steering Group agreed to look at another site, not a SHELAA site but one that appeared to be sustainable for affordable housing and next to an area that had already been

¹⁴ See: <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/evidence-base/strategic-housing-economic-land-availability-assessment-shelaa-2021-call-for-sites>

¹⁵ Also see footnote 8 on page 30 of the AECOM report and the Addendum



developed for affordable housing, Meadow Close. The background to this decision is explained under “Report conclusions” below. By this stage, it was too late to engage AECOM to do the assessment so this was done by the Steering Group’s consultant using the Test Valley Borough’s methodology to provide a comparable result. This site, although included in the consultation, is not in the AECOM report but is assessed in the Addendum.

Development capacity

It is important to stress that we would not envisage using the sort of capacities included in the SHELAA reports and quoted by AECOM in their site assessments. Planning Policy capacities do not allow for roads and paths, nor do they consider many constraints on the sites or any requirement for public open space. They simply take the site size and look at how many dwellings per hectare it can theoretically accommodate.

Site assessments

The Addendum contains several corrections and clarifications which should be referred to when reading the assessments for SHELAA sites 261, 16b and 178.

For site 171, Land South of Romsey Road (part behind the village hall) an important point to emphasise from the conclusions in the AECOM assessment (page 35):

“Development of any part of the site would have landscape and visual impacts and would impact the rural character of this part of the settlement. *There are no natural boundaries to contain a smaller amount of development.*” (Italics added)

Natural boundaries or other constraints are key to containing a development site. Where there are no such features, it usually means that the wider site is susceptible to further development in the future. The exception to this is where a legal agreement can be drawn up to provide for the remainder of the land as public open space or similar.

It should be noted that none of the sites examined had a ‘green’ traffic light score, therefore each site has constraints which need to be overcome before development would be considered appropriate. It may be that such issues could never be resolved.

Report conclusions

The Addendum carries a correction to paragraph 6.8 of the report (page 45). This is headed Affordable Housing and refers to a policy which has been superseded. The change of policy has an important bearing on the building of affordable housing in Wellow Parish. The policy raises the threshold for building a proportion of affordable housing within a development from 5 to 10 or more houses on a site. The residents’ survey highlighted that no new housing development should be for 10 or more dwellings. This would mean that the Parish would not receive any contribution towards affordable housing. Therefore it was felt that a separate allocation for affordable housing would provide the potential for the building of some affordable housing.



Strategic Environmental Assessment

With the agreement of Test Valley Borough Council and New Forest National Park, the Steering Committee has commissioned a Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA) using qualified consultants.

An SEA identifies, describes and evaluates the likely significant effects on the environment of implementing the neighbourhood plan and reasonable alternatives considering its objectives and geographical scope. The HRA tests if the policies in the Neighbourhood Plan could significantly harm the designated features of European sites. In the case of Wellow, these are primarily Mottisfont Bats Special Area of Conservation (SAC), New Forest SAC, New Forest Special Protection Area (SPA) and Ramsar¹⁶ and the Solent Maritime SAC. The outcomes of these assessments could impact on the site assessments included here and could preclude certain sites from being taken forward.

¹⁶ Ramsar Sites are wetlands of international importance that have been designated using the criteria set out in the Ramsar Convention on Wetlands. The sites contain representative, rare or unique wetland types or are important in conserving biodiversity.