



# Wellow Neighbourhood Plan

## **Regulation 16 Consultation**

December 2023



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# 1 INTRODUCTION

## 1.1 Context

- 1.1.1 These representations provide Gladman Developments Ltd (Gladman's) response to the Wellow Neighbourhood Plan (WNP) under Regulation 16 of the Neighbourhood Plan (General) Regulations 2012.
- 1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the Development Plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Local Plan and Neighbourhood Plan examinations.
- 1.1.3 Through these representations, Gladman provides an analysis of the WNP, and the policy choices promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the WNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG.
- 1.1.4 Gladman are promoting land south of Romsey Road, West Wellow for development within the neighbourhood plan area and a site submission is included within these representations at Section 6.

## 2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

### 2.1 Legal Requirements

- 2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the WNP must meet are as follows:

*“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*

*(d) The making of the order contributes to the achievement of sustainable development.*

*(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*

*(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

*(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”*

### 2.2 National Planning Policy Framework

- 2.2.1 The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.

- 2.2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed

housing needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

2.2.3 Planning Practice Guidance (PPG) makes clear that neighbourhood plans should conform to national policy requirements and take account of the most up-to-date evidence. This is so that Wellow Parish Council can assist Test Valley Borough Council (TVBC) in delivering sustainable development and be in accordance with basic condition (d).

2.2.4 The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

2.2.5 Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

2.2.6 Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

## 2.3 National Planning Policy Consultations

2.3.1 In December 2022, Secretary of State for Levelling Up, Housing and Communities, Michael Gove, unveiled a raft of proposed planning reforms as part of the Levelling Up and Regeneration Bill. A consultation on proposed reforms to the NPPF, views on

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an approach to preparing National Development Management Policies alongside developing policies to support levelling up, closed in March 2023.

- 2.3.2 The proposals include revisions to how housing figures should be derived, address issues in the operation of housing delivery and supply tests and several other elements. However, the Government has reiterated its commitment to delivering 300,000 homes a year, with the changes focussed on increasing housing delivery.
- 2.3.3 The consultation document highlights that reforms to the plan-making system are intended to be introduced in late 2024 and the Government have highlighted that plan-makers will have until 30 June 2025 to submit Local Plans for independent examination under the existing legal framework.
- 2.3.4 There is the potential these changes could impact the WNP and there is potential need to undertake a review of the neighbourhood plan following the Plan's adoption. Further details on this matter are set out in section 3 of these representations.

## 3 RELATIONSHIP TO LOCAL PLANS

### 3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The adopted Development Plan relevant to the preparation of the WNP and the Development Plan which the WNP will be tested against is the Test Valley Borough Revised Local Plan DPD 2011-2029, adopted in January 2016. This document contains the policies and spatial strategy to guide development throughout the plan period.
- 3.1.3 The plan sets a minimum housing target of 10,584 new homes split across northern and southern Test Valley. West Wellow the largest of the settlement areas within the parish is identified as a rural area within the settlement hierarchy.
- 3.1.4 The Local Plan supports communities wishing to bring forward neighbourhood plans that provide for additional development than the Local Plan. Paragraph 5.47<sup>1</sup> states:

*'The choice of sites could be either within or outside of settlement boundaries provided that the site selection takes into account the principles of sustainable development and the relevant policies within the Local Plan.'*

### 3.2 Emerging Development Plan

- 3.2.1 Test Valley are in the process of preparing a new Local Plan to cover the period up to 2040. Consultation on the next stage of the plan is expected later this year with the Council still in the process of undertaking detailed site assessments.
- 3.2.2 In the latest consultation draft, the combined settlement areas in the parish were considered together as Wellow and identified as a second tier settlement in the hierarchy. This is due to the level of services and facilities along with level of access to public transport services. This elevation in the settlement hierarchy indicates the

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<sup>1</sup> Test Valley Borough Revised Local Plan DPD Adopted Local Plan 2011-2029

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settlement's ability to accommodate growth noting that key environmental factors will be a consideration around quantum. Although it is not yet clear, as there is a chance that Wellow will need to plan for an additional level of need beyond that currently set out in the emerging neighbourhood plan, Gladman suggest that the WNP either increases the level of homes allocated or includes sufficient flexibility to allow adjustment for changes in circumstances.

- 3.2.3 This degree of flexibility is required to ensure that the WNP is capable of being effective over the duration of the plan period and not ultimately be superseded under the provisions of s38(5) of the Planning and Compulsory Purchase Act 2004.



## 4 WELLOW NEIGHBOURHOOD PLAN

4.1.1 This section is in response to the WNP consultation document and its supporting evidence base.

### 4.2 Vision and Objectives

4.2.1 Gladman note objective 3a is to support a series of smaller developments rather than a single larger development, however it is essential that the associated benefits that can be provided from a single larger scale development should be considered. By not exploring the potential opportunities of larger scale development, the neighbourhood plan is limited from the outset in what it can achieve in terms of supporting sustainable development, delivering community benefits, and providing affordable housing.

### 4.3 Policy WP-L1B – Landscape Character Outside of the National Park

4.3.1 Gladman object to the designation of the New Forest Heritage Area as a valued landscape. This appears to be an attempt to extend the National Park to restrict development within the Parish.

4.3.2 The WDCAG provides a useful summary of the area's previous consideration as an extension to the New Forest National Park but also sets out the reasons why they were discounted from consideration. There is therefore no evidence to support the designation of the area as a valued landscape in policy terms.

4.3.3 Gladman are concerned that the proposed policy will seek to prejudice the delivery of sustainable development proposals from coming forward. The emphasis of this policy is on the 'protection' of the landscape of the surrounding area rather than seeking to integrate new sustainable development opportunities within the existing landscape and character of the local area.

4.3.4 Furthermore, to be valued, a view would need to have some form of physical attributes demonstrating its significance. The policy must allow for a decision maker to come to a view as to whether particular locations contain physical attribute that

would 'take it out of the ordinary' rather than designating vast swathes of land which may not have any landscape significance and are based solely on community support.

- 4.3.5 Opinions on landscape are highly subjective and therefore without robust evidence to demonstrate why these areas are considered special beyond the fact that they are 'an area of attractive and unspoilt countryside,' Gladman recommend that this policy is deleted.

## 4.4 Policy WP-L3 – Local Green Spaces

- 4.4.1 Policy WP-L3 seeks to designate 17 areas as Local Green Spaces (LGS) therefore protecting them from development due to their local significance or community value.

- 4.4.2 In order to designate land as LGS the Parish Council must be able to demonstrate robust evidence to meet national policy requirements as set out in the Framework. The Framework makes clear at §101 that the role of local communities seeking to designate land as LGS should be consistent with the local planning of sustainable development:

***"The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period."***

- 4.4.3 Further guidance is provided at §102 of the Framework which sets out three tests that must be met for the designation LGS, stating:

***The Local Green Space designation should only be used where the green space is:***

***a) in reasonably close proximity to the community it serves;***

***b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and***

***c) local in character and is not an extensive tract of land.***

- 4.4.4 Gladman contend that the table of proposed Local Green Space does not provide proportionate or robust evidence as required by the PPG to designate such land.
- 4.4.5 Failure to demonstrate how each designation meets the tests set out in §102 is contrary to the requirements of national policy and guidance and is therefore inconsistent with basic condition (a).
- 4.4.6 The Examiner of Backwell Neighbourhood Plan found two proposed LGSs at Farleigh Fields and Moor Lane Field to constitute extensive tracts of land given their respective sizes of 19 and 32 hectares. Accordingly, the Examiner concluded that their proposed LGS designations had failed to show regard to national planning policy and required their removal.
- 4.4.7 Indeed, the following Examiner's Reports make similar points:
- The Oakley and Deane NP (Examiner's Report dated December 2015) – the Examiner concluded that a proposed LGS designation on a site of just over 5 hectares to be contrary to national planning policy.
  - The Wivelsfield NP (Examiner's Report dated August 2016) – the Examiner concluded that proposed LGS allocations on sites of 3.6 hectares and 8.6 hectares. The Inspector pointed to PPG paragraph 13 which listed "sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis" as potential LGS allocations. The Inspector stated the areas suggested are notably smaller than the fields promoted in the NP.
  - The Faringdon NP (Examiner Report dated August 2016) – the Examiner concluded that Humpty Hill at 5.6 hectares on the edge of the town was an extensive tract of land and it was subsequently deleted as a LGS allocation.
- 4.4.8 Whilst Gladman support the deletion of some of the previously designated LGSs, the Council should be mindful that LG4 and LG5, though drawn as separate parcels do

become one large tract of land. Gladman do not consider this suitable and recommend that these parcels are also deleted.

## 4.5 Policy WP-L4 – Important Views

- 4.5.1 This policy identifies 13 important views which the plan considers are important for the setting of Wellow and seeks for development to preserve these important views. To pass such a high bar any views should be clearly identified, including on an updated policy map, with the key characteristics and attributes detailed. This is essential to conform with national policy, guidance and case law regarding key views and valued landscapes.
- 4.5.2 For a view to be identified for protection there should be demonstrable physical attributes that elevate its importance out of the ordinary. Any protection afforded by such a policy should not be seeking to protect views of the open countryside due to their pleasant sense of place.
- 4.5.3 Furthermore, this policy must be suitably worded to 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.
- 4.5.4 In this regard, Gladman object to the identification of view point 8 listed as 'From School Road looking north-west across to Buttons Lane'. The evidence to support the policy does little to indicate why a view should be protected from School Road, other than providing a nice view of the surrounding fields. Gladman submit that development could come forward east of Buttons Lane without causing significant adverse impact on the setting of West Wellow and there is insufficient evidence to support the protection of the view within this plan. Gladman therefore suggest this element of the policy is deleted.

## 4.6 Policy WP-L10 – The River Blackwater

4.6.1 This policy seeks to protect an extensive buffer around the river Blackwater including its tributaries. Gladman query why the extent of area to be protected is so large and includes the entirety of the site being promoted by Gladman.

4.6.2 As part of development proposals and where the tributary runs beyond the site boundary, Gladman are exploring making this area publicly accessible for the benefit of future residents and existing community, however the policy is not currently supported by proportionate evidence and Gladman therefore suggest that the buffer around the watercourse is removed.

4.6.3 Any major application around the watercourse will be subject to an LVIA as standard; this does not need to be mandated by a neighbourhood plan policy.

## 4.7 Policy WP-L11 – Solent and Southampton Water SPA and Solent Maritime SAC

4.7.1 This policy is considered to be strategic in nature and best dealt with through the Local Plan Review.

4.7.2 While there is currently a policy void around this issue, any planning applications that are currently affected by the nitrates and phosphates issue across the County would need to accord with current regulations and Natural England advice to be capable of achieving planning consent. It is not suitable for this to be mandated through a neighbourhood plan policy.

## 4.8 Policy WP-H1 – Housing Need

4.8.1 Gladman consider that it is vital to meet the housing needs of the community in full. The proposed housing requirement for 22 homes up to 2029 in the above policy and the associated Housing Needs Assessment evidence is fundamentally flawed and is not reflective of the parish needs.

**4.8.2** As outlined in full in Appendix A, Gladman have undertaken a Housing Need and Sustainability Assessment and concluded that Wellow should have an identified a housing requirement of between 87 and 296 new homes over the period 2020-2040, based on three different assessment scenarios utilising a top-down apportionment. It is vital that proportionate housing is directed to Wellow to sustain the vitality of the parish and address emerging socio-economic issues that are arising such as significant housing unaffordability, waning school pupil numbers and an ageing population.

*Table 1: Summary of Local Housing Need Assessments for Wellow*

Scenario	Proposed Housing Requirement
<b>Scenario 1:</b> Top-down apportionment utilising adopted Rural Test Valley housing requirement up to 2040.	<b>87 dwellings</b>
<b>Scenario 2:</b> Top-down apportionment utilising the adopted Northern Test Valley housing requirement up to 2040.	<b>296 dwellings</b>
<b>Scenario 3:</b> Top-down apportionment utilising the emerging Northern Test Valley up to 2040.	<b>231 dwellings</b>

**4.8.3** The proposed housing requirement outlined by this policy is a mere 22 dwellings up to 2029, before the housing need for the rest of the plan period is to be based on a review of the data following the adoption of the Test Valley Borough Local Plan 2040.

Gladman do not consider this to be an appropriate strategy. The neighbourhood plan should seek to determine the housing need for the entirety of the plan period and make suitable allocations to meet that need. Simply deferring the determination of the housing requirement for the majority of the plan period is not positive planning

and serves to hinder the delivery of much needed market and affordable homes in the Parish.

- 4.8.4 The Housing Needs Assessment (HNA) produced by the Parish Council is inadequate, inconsistent and does not align with national planning policy. Section 1 of the HNA Summary document outlines that this should be read in conjunction with the Technical Report, however this document has not been published as part of the evidence base of this neighbourhood plan, this needs to be made available for consultation.
- 4.8.5 Notwithstanding this, the HNA Summary document outlines that a top-down approach using the borough-wide housing requirement (excluding the area within New Forest National Park) was used to determine the housing requirement for the Parish. Firstly, it is not appropriate to simply exclude the National Park area from assessments of housing need. As identified within the New Forest National Park Local Plan, there is a significant housing need within the national park and national policy guidance is clear that 'housing need' is an unconstrained assessment of the number of homes needed in an area<sup>2</sup>. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure, and preparing policies to address this such as site allocations. Indeed, this was the approach taken initially by the national park authority as they developed their adopted Local Plan.
- 4.8.6 The NPPF expects strategic policy-making authorities to set a housing requirement for designated neighbourhood areas as part of their strategic policies and within administrative areas of National Parks, a housing requirement figure should be set for the proportion of the designated neighbourhood area which is covered by their administration<sup>3</sup>. In any case, a neighbourhood plan steering group can request an

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<sup>2</sup> PPG 2a-001

<sup>3</sup> PPG 41-101 & NPPF Paragraph 66

indicative housing requirement figure for their area from the local planning authority<sup>4</sup>.

- 4.8.7 In this regard, conducting a housing need assessment for Wellow parish while excluding the parish area within the national park does not accord with the NPPF and PPG. The subsequent housing requirement therefore cannot be considered to meet basic conditions a) and e).
- 4.8.8 Secondly, it is unclear how the HNA conducts the top-down apportionment of the borough wide requirement and comes to the conclusion that 58 dwellings are required within Wellow between 2011-2029. The summary table within the executive summary outlines that 58 dwellings are needed between 2016 and 2029 (equating to 4.46 dwellings per annum), yet in section 6.1 of the HNA Summary document notes that market signals support the delivery of 58 dwellings between 2020-2029 (6.4 dwellings per annum), before removing completions from 2011 to set a requirement of 22 dwellings for the Neighbourhood Plan up to 2029.
- 4.8.9 There are further inconsistencies when investigating the supporting text of Policy WP-H1 in the Neighbourhood Plan, where table 4 suggests a housing need of 80 dwellings between 2011-2036 (3.2 dwellings per annum) before looking at housing completions from 2011 and then suggesting an outstanding requirement of 44 dwellings between 2011-2036, before deducting proposed Neighbourhood Plan allocations (22 dwellings). It is therefore clear that the HNA Summary, Housing Survey and Neighbourhood Plan have substantial inconsistencies which make it impossible to understand how the proposed housing need or requirement figures have been arrived at.
- 4.8.10 Without full sight of the technical HNA Gladman consider that the approach and conclusion on the housing need and requirements for Wellow is fundamentally

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<sup>4</sup> PPG 41-102 & NPPF Paragraph 67



flawed and cannot be considered to meet the basic conditions or deliver the needs of the local community.

- 4.8.11 An alternative, proportionate assessment and understanding of a top-down apportionment approach to housing needs, including consideration of historic housing completions, is set out in Appendix A.
- 4.8.12 In any case, the HNA is clearly led and supported by the preceding Housing Needs Survey. Gladman make clear that planning policy regarding housing need should not be determined by a survey that does not have robust demographic modelling and assumptions underpinning the methodology and instead is based on local preference.
- 4.8.13 The Housing Needs Survey used to justify the HNA, and the subsequent housing requirement are fundamentally flawed. The Housing Needs Survey is an opinion survey conducted by a non-for-profit organisation.
- 4.8.14 Notwithstanding this, the neighbourhood plan seems to ignore one of the key conclusions of the survey which was the provision of homes suitable for local residents to upsize. Rather the neighbourhood plan seeks to focus on delivering small family homes and bungalows with no acknowledgement of the local people who responded to this survey noting that they wish to move to a larger home but there are none suitable in the area.

## 4.9 WP-H2 – Sites Allocated for Housing Development

- 4.9.1 The policy allocates two sites for residential development: Site WP1 and Site WP2 for 9 and 10 homes, respectively. These allocations fall short of the already menial housing requirement of 22 homes, and significantly short of what the housing requirement should be.
- 4.9.2 In commissioning work through AECOM, the neighbourhood plan notes that 'The brief to AECOM was that the following community consultation, the Parishioners were looking for small scale sites in line with both the findings of the Parish surveys and the housing figures presented in the Housing Needs Survey and Assessment.' Yet, the

housing need is not met, regardless of the housing need being incorrect and significantly lower than it needs to be. This means that the AECOM assessment has been undertaken based on preferences of the local population, rather than robust evidence of housing needs. Where sites have been disregarded because of their size, this is not based on the actual suitability of a site to deliver housing, but simply because the population that responded to the survey would prefer smaller sites. Notwithstanding the fact that the question regarding the size of sites offered very small denominations and considered 'over 30 dwellings' to be large scale, it seems both the evidence base and resultant reports have been manipulated to stop large scale development coming forward in the village without due consideration of housing and sustainability needs of the village. This is explored fully in Appendix A which clearly notes that using difference scenarios gives a significantly higher housing need than is currently planned for.

4.9.3 The decision to not provide for additional development is a significant missed opportunity, especially in light of our earlier comments around housing need and that this is likely to be in excess of what is currently planned for.

4.9.4 Furthermore, as per our previous submission to the regulation 14 consultation, Gladman object to the assessment of land south of Romsey Road as currently contained within the Site Options and Assessment Final Report and the reasons for discounting the site for potential allocation. This will be addressed through Section 6 of this representation. Gladman suggest that an updated site assessment should be undertaken with the site considered as a reasonable alternative through the Strategic Environmental Assessment (SEA) supporting the consultation to ensure that the basic conditions can be met.

## 4.10 Policy WP-H2 – Infill and Redevelopment Policy

4.10.1 Outside of site allocations this policy is the only mechanism to bring forward additional development to meet local needs focussing on infill and redevelopment opportunities. Only supporting residential development in these limited instances is a restrictive approach which does not accord with national policy which sets out a

presumption in favour of sustainable development and the national policy imperative which seeks to significantly boost the supply of housing. Whilst Paragraph 119 of the NPPF seeks to make as much use of previously developed land as possible it does not support an approach to exclusively support brownfield development opportunities.

- 4.10.2 Gladman suggest that flexibility should be added to this policy to also include instances where development of greenfield opportunities would be supported. Gladman recommend that Policy WP-H2 is modified to be consistent with the requirements of national policy to ensure flexibility and to enable the Plan to react in changes in circumstance over the plan period. Accordingly, the proposed wording is put forward for the Parish Council's consideration:

**"The Wellow Neighbourhood Plan will support 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 Wellow 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 proposals adjacent to the existing settlement will be supported provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development."**

## 5 STRATEGIC ENVIRONMENT ASSESSMENT/SUSTAINABILITY APPRAISAL

### 5.1 Context

- 5.1.1 The preparation of neighbourhood plans may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects.
- 5.1.2 The SEA is a systematic process that should be undertaken at each stage of a Plan's preparation. It should assess the effects of a neighbourhood plan's proposals and whether they would be likely to have significant environmental effects and whether the Plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.
- 5.1.3 In our previous submission Gladman noted that both the SEA Directive and Neighbourhood Planning PPG make expressly clear that an SEA Screening Assessment should be undertaken at the earliest opportunity<sup>5</sup>. Gladman approved of the Parish Council's decision to undertake an SEA to support the current consultation.
- 5.1.4 However, it was submitted that the assessment had not fully assessed the reasonable alternatives in sufficient detail and further assessment should be undertaken prior to this regulation 16 consultation. There is no evidence that this has been done. If further assessment has been undertaken, this should be provided for consultation as soon as possible.
- 5.1.5 The most significant concern Gladman still have with the SEA is that land south of Romsey Road, West Wellow was discounted too early in the plan making process and should have been considered as a reasonable alternative. As it stands, the Parish Council have not assessed different housing requirements and the capacity of the

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<sup>5</sup> PPG Paragraph 029 Reference ID: 11-029-20150209

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settlement to accommodate the required level of growth to support the sustainability of the settlement. As such, Gladman do not consider that the plan is able to meet basic condition (f).

## 6 SITE SUBMISSION

### 6.1 Land South of Romsey Road, West Wellow

- 6.1.1 Gladman are promoting land for residential development within the Parish. The 14.3 acre site is located to the south of Romsey Road and could deliver up to 115 homes in a mix of sizes, 40% of which will be affordable. This will provide a range of homes to meet the needs within the area and enable local people who are seeking an affordable house the ability to stay within their community. We have also reviewed our previous proposals and consider that there is significant potential for a smaller development that includes land for potential community use. We have prepared an updated masterplan included as appendix B.

#### Site Merits

- 6.1.2 A significant amount of public open space is proposed on site. In addition to the open space provided within the red edge an additional 1.11ha of open space is proposed to be provided on the land adjacent to the site. The green infrastructure will help retain and enhance existing landscape features, provide habitat connectivity and enhance biodiversity. New landscaping features will be incorporated into the development and will filter views of the new homes.
- 6.1.3 The public open space across the sites provides a by a series of footpaths which link to the wider network. The footpath networks provide an opportunity for dog walking and recreation.
- 6.1.4 West Wellow is identified as a Rural Village in the Test Valley Settlement Hierarchy with essential services and facilities which whilst not suitable for strategic scale allocations some additional development may be appropriate. The Village has a number of key services and facilities within walking distance of the site including a shop, pharmacy, village hall, Primary school and pub. The location of the site and walkability to local facilities and amenities is highlighted through the adjacent map.

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- 6.1.5 West Wellow benefits from public transport links to wider destinations. Main bus routes offering services to Romsey and Nomansland. Romsey can be accessed within 10 minutes and larger settlements such as Southampton and Salisbury can be reached within 20 minutes.
- 6.1.6 In addition, the site is located a 5-10 minute drive from Romsey which provides access to wider services, facilities, and employment alongside rail access to the wider region, while Southampton is located just a 15 minute drive from the centre of site.

#### Site Assessment Report

- 6.1.7 Gladman object to the assessment of the site through the Site Assessment report. The assessment is too narrow in its consideration and limits it on the whole to compliance with the adopted Local Plan ignoring the fact that the neighbourhood plan is the correct document to be making additional site allocations to the Local Plan.
- 6.1.8 Through our previous applications on site, we have confirmed that the site is capable of supporting development, recognizing potential landscape and visual impacts and this should not be used in the assessment against the site. In addition, our amended concept plan clearly indicates that there is a natural boundary capable of containing a smaller development. At the very least the site should be scored amber and therefore considered through the SEA process.

## 7 CONCLUSIONS

### 7.1 Summary

- 7.1.1 Gladman welcomes the opportunity to comment on the Regulation 16 Consultation currently being considered. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2023) and the associated updates that were made to Planning Practice Guidance.
- 7.1.2 Gladman have provided comments on a number of the issues that have been identified in the consultation material and recommend that the matters raised are carefully explored before the next stage of the neighbourhood is consulted upon. At present, Gladman suggest due to the restrictive nature of many of the policies contained within the draft document that the neighbourhood plan may not be capable of meeting basic condition (d).
- 7.1.3 Gladman consider that the site should be considered through the SEA process and is clearly capable of allocation through the neighbourhood plan.
- 7.1.4 Due to the nature of the representations Gladman consider that a public hearing will be an appropriate method for the examination of the WNP. Should the Examiner agree, Gladman respectfully request to be invited to any hearing to raise our concerns verbally.



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## APPENDICES

### Appendix A: Housing Need and Sustainability Assessment



# Housing Need and Sustainability

**Wellow Parish**

December 2023



[gladman.co.uk](https://www.gladman.co.uk)



01260 288888

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- 1.2.3 The parish is well connected to the public transport network with the number X7 bus providing services to Salisbury, Southampton and Romsey amongst other settlements. The A36 provides direct road connections to Southampton and access to the M27.

### 1.3 Planning Policy

- 1.3.1 Wellow parish is located in Test Valley Borough with a small area of the parish, south of the A36, within New Forest National Park. The development plans therefore relevant to the parish are the Test Valley Borough Revised Local Plan (TVBRLP) (2011-2029) and the New Forest National Park Local Plan (NFNPLP) (2016-2036).
- 1.3.2 The TVBRLP was adopted in January 2016 and sets the vision for development across the borough over the plan period 2011-2029, including the policies and proposals which form the spatial strategy. Over the plan period, a borough wide housing requirement of 10,584 dwellings is identified before this is split between the Northern and Southern areas as 7,092 dwellings and 3,492 dwellings respectively. Wellow parish is not identified within the spatial strategy, however the settlement of West Wellow is identified as a Tier 3 Rural Villages in the settlement hierarchy.
- 1.3.3 In 2018, Test Valley Borough Council began preparing a new Local Plan for the borough which would replace the TVBRLP. In 2022 a consultation was undertaken on Draft Local Plan 2040 Regulation 18 Stage 1 document which identifies Wellow parish as a tier 2 settlement below Andover and Romsey in the settlement hierarchy, a tool used to identify the sustainability of the role and function of settlements.
- 1.3.4 The NFNPLP was adopted in 2019 and sets out the vision, objectives, spatial strategy and planning policies for the entire National Park, for the period up to 2036. The document outlines there is a significant housing need within the national park area to support local communities and identifies a housing requirement of 800 dwellings between 2016-2036.
- 1.3.5 In 2017, Natural England issued advice regarding residential development in close proximity to the New Forest Special Protection Area (SPA) noting that potential urban

edge impacts on the integrity of SPA could not be ruled out for new residential development located within 400 metres of the designation. Therefore, no greenfield allocations were identified within these areas for the Test Valley or New Forest National Park Local Plans. It should be noted that further evidence and information is likely to be developed as part of the emerging Local Plan preparation process and this position may be updated. In addition, the advice is limited to avoiding development in locations that might impact the integrity of the SPA, it does not negate the housing needs of the area.

- 1.3.6 The Wellow neighbourhood area was designated under the Localism Act 2011 by Test Valley Borough Council and New Forest National Park Authority.

## 1.4 Report Structure

- 1.4.1 This report seeks to undertake a high level assessment as to the appropriate scale of growth for the parish is for the period 2020-2040. The report will set out the historic housing growth in the Parish since 2011 before looking at affordability of housing and the impact residential growth has for small communities.
- 1.4.2 Finally, the report will undertake a top-down apportionment of housing needs for Wellow through understanding the resident population of the parish, borough and HMAs alongside the identified housing needs between 2020-2040.

## 2 HOUSING NEED IN THE PARISH

### 2.1 Affordability

- 2.1.1 The ratio of median house price to median gross annual workplace-based earnings which indicates the affordability of housing in local authority areas, as confirmed by the PPG<sup>1</sup>, highlights the worsening affordability issues within Test Valley Borough.

	2018	2019	2020	2021	2022
Affordability Ratio	10.12	9.91	9.93	10.58	10.91

*Table 1: Ratio of median house price to median gross annual (where available) workplace-based earnings in Test Valley Borough<sup>2</sup>*

- 2.1.2 Lenders typically use an income multiple of 4-4.5 times salary per person to assess mortgage affordability, therefore it is clear that there is a significant affordability crisis within Test Valley. This is even more stark when compared against the average affordability ratio in England which stands at 9.62.
- 2.1.3 Robustly assessing the affordability of housing within Wellow parish is difficult due to the availability of data at this scale.
- 2.1.4 However, according to Rightmove, which utilises data from HM Land Registry, West Wellow had an average residential sale price of £703,400 over the last 12 months, a 23% increase from 2020. Across a wider area (within 1 mile of West Wellow), the average residential sale price was £745,944.
- 2.1.5 This is significantly greater than the average UK house price of £290,000 and the average price of £394,096 in the South East of England<sup>3</sup>.

<sup>1</sup> PPG Reference ID: 2a-005-20190220

<sup>2</sup> House price to workplace based earnings ratio (Table 5c):  
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

<sup>3</sup> ONS UK House Price Index: July 2023

- 2.1.6 It is therefore clear that high and worsening affordability is a key factor in housing needs across Test Valley Borough and in Wellow Parish.

## 2.2 Housing and the Impact on Small Communities

- 2.2.1 The NPPF provides a framework to enable and facilitate sustainable patterns of development to address housing needs and other economic, social and environmental priorities<sup>4</sup>. The Framework also seeks to support a prosperous rural economy whereby planning policies and decisions should enable the retention and development of accessible local services and community facilities<sup>5</sup>.

- 2.2.2 The PPG highlights that people living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities<sup>6</sup>. Therefore, to address these issues and promote sustainable development the NPPF suggests that,

*"...housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby"*<sup>7</sup>

- 2.2.3 It is clear that national planning policy seeks to protect and enhance the sustainability and vitality of villages and rural areas such as Wellow parish and proportionate housing growth is a vital tool of ensuring this.

- 2.2.4 Wellow Primary School is a key community facility within the parish with a school capacity of 246 pupils. However, according to the Department for Education, it is operating with available capacity for an additional 39 pupils, over 15% of overall capacity<sup>8</sup>.

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<sup>4</sup> NPPF (2021) Paragraph 15

<sup>5</sup> NPPF (2021) Paragraph 85

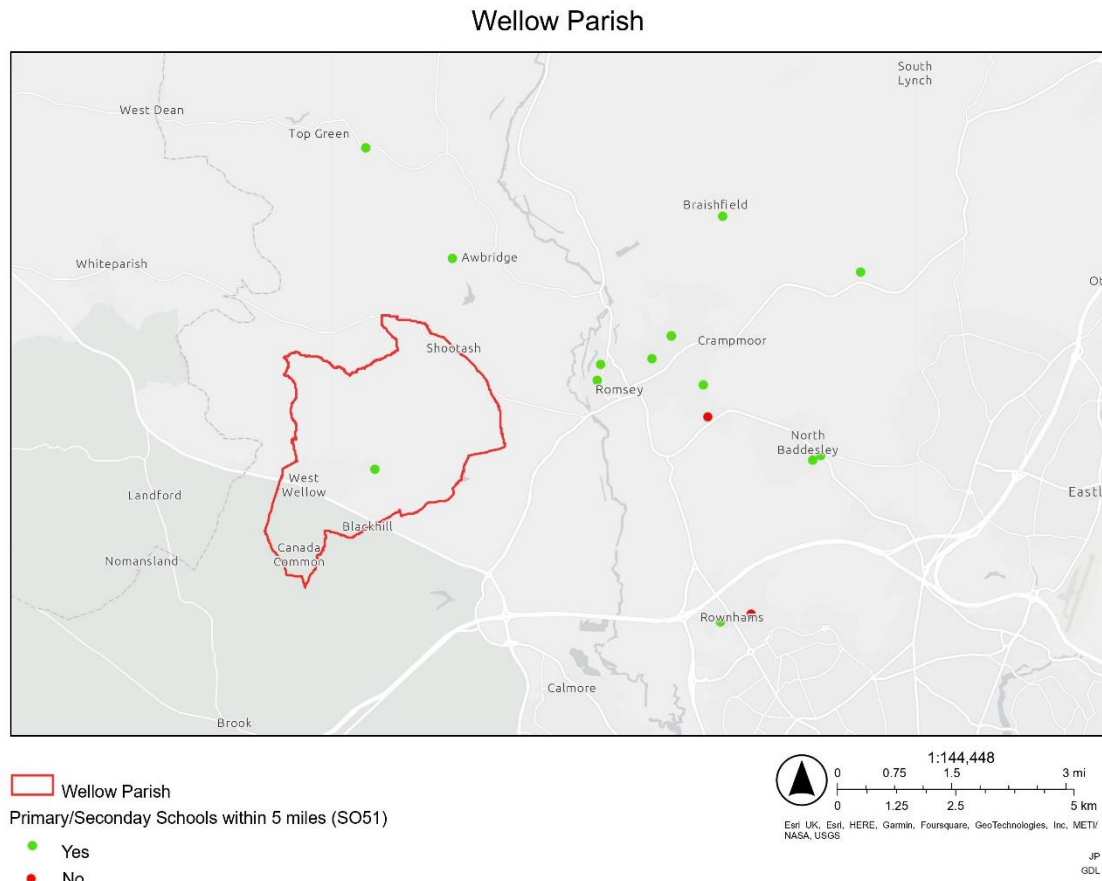
<sup>6</sup> PPG Reference ID: 67-009-20190722

<sup>7</sup> NPPF (2021) Paragraph 79

<sup>8</sup> <https://www.get-information-schools.service.gov.uk/Search?SelectedTab=Establishments>



- 2.2.5 There are numerous primary schools across the district and in close proximity to the pupil travel areas that have capacity available, see figure 4.



***Figure 3: Primary School and Capacity information within 5 miles of Wellow***

- 2.2.6 New housing influences the structure of the population bringing in-migration and buyers of new build properties tend to be younger<sup>9</sup>. The delivery of new housing in Wellow, including provision of family homes, is therefore likely to attract a younger section of the population to the parish where over 32% of the parish population are aged 65 years and above, and only 14% are aged 15 years and under<sup>10</sup>.

<sup>9</sup> [https://www.savills.co.uk/research\\_articles/229130/306693-0](https://www.savills.co.uk/research_articles/229130/306693-0)

<sup>10</sup> ONS CENSUS 2021

- 
- 2.2.7 The provision of new homes in Wellow, in close proximity to the primary school, could provide the necessary pupil yields to ensure the ongoing viability of the school and reduce travel to school distances.
- 2.2.8 In addition, there is the potential to reduce travel to Wellow Primary School distances and enabling more pupils to walk to school, which will ultimately provide highway and traffic benefits with fewer cars driving into the parish at peak times.

## 3 ASSESSMENT OF LOCAL HOUSING NEED

### 3.1 Introduction

- 3.1.1 The following section will assess the local housing needs for the parish of Wellow to provide an indicative understanding of the level of housing requirement that should be directed to the village through the emerging Local and Neighbourhood Plan processes.
- 3.1.2 This approach will utilise a top-down apportionment approach as concluded is appropriate by the Neighbourhood Plan Steering Group in their Housing Needs Assessment Summary document dated February 2021. It should be noted at this stage that the aforementioned document notes that it should be read in conjunction with the HNA Technical Report, however this is not available on the consultation website nor the Steering Group website.
- 3.1.3 The following assessments sets out several scenarios to account for the adopted housing needs figures, emerging Local Plan requirements.

### 3.2 Policy Context

#### **Housing Requirement**

- 3.2.1 Despite being geographically located in the south of the borough, Wellow parish forms part of the Northern Test Valley (NTV) Housing Market Area (HMA) rural areas. The Test Valley Revised Local Plan identifies a minimum requirement over the plan period (2011-2029) for the borough of 10,584 dwellings (588 dwellings per annum).
- 3.2.2 The borough-wide housing requirement is also split to provide a figure for the Rural Test Valley area of 648 dwellings (36 dwellings per annum) but this is not disaggregated across the settlements identified in Policy COM2, table 7.
- 3.2.3 The emerging Test Valley Local Plan consulted on a Regulation 18 Stage 1 Document in February 2022 which proposed a borough wide housing requirement of 10,820

dwelling (541 dwellings per annum). This proposed a split of 57% of the housing requirement being met in the Northern Test Valley HMA (308 dwellings per annum) and 43% in Southern Test Valley HMA (233 dwellings per annum) but did not set a figure for the rural areas.

- 3.2.4 The NPPF expects strategic policy-making authorities to set a housing requirement for designated neighbourhood areas as part of their strategic policies and within administrative areas of National Parks, a housing requirement figure should be set for the proportion of the designated neighbourhood area which is covered by their administration<sup>11</sup>. In any case, a neighbourhood plan steering group can request an indicative housing requirement figure for their area from the local planning authority<sup>12</sup>.

### **Plan Period**

- 3.2.5 The NPPF is clear that strategic policies should look ahead over a minimum 15 year period from adoption. In the context of the adopted Revised Local Plan period only running until 2029 and the adopted New Forest National Park Local Plan plan period up to 2036, it is considered that the most appropriate period to assess the housing requirement over is 2020 – 2040.
- 3.2.6 In line with this period, it is considered that the most appropriate population data to base the assessment on is that identified within the 2021 Census.

## **3.3 Top-Down Housing Need Assessment**

- 3.3.1 A top-down apportionment of housing need for Wellow parish can be conducted using various approaches and data. Due to the current stage of plan-making across the New Forest and Test Valley areas and the policy and environmental constraints which affect the parish the following scenarios have been tested:

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<sup>11</sup> PPG Paragraph: 101 Reference ID: 41-101-20190509

<sup>12</sup> PPG Paragraph: 102 Reference ID: 41-102-20190509

- **Scenario 1:** Top-down apportionment utilising adopted Rural Test Valley housing requirement up to 2040.
- **Scenario 2:** Top-down apportionment utilising the adopted Northern Test Valley housing requirement up to 2040.
- **Scenario 3:** Top-down apportionment utilising the emerging Northern Test Valley up to 2040.

### **Scenario 1: Top-down apportionment utilising the adopted Rural Test Valley housing requirement up to 2040**

- 3.3.2 As identified in section 3.1, the rural area of the Northern Test Valley HMA was set out a housing requirement of 648 dwellings (36 dwellings per annum). Although based upon outdated information only proposed to be used until 2029, it provides a useful starting point for understanding the housing needs of Wellow up to 2040.
- 3.3.3 Using Policy COM2 and the rural villages identified in table 7, Gladman have identified those located within the Northern Test Valley HMA before grouping these settlements into their parish areas to provide a reliable and consistent basis for conducting the assessment, this information can be found at Appendix 1.
- 3.3.4 Following this, using 2021 Census data the usual resident population of each parish was identified, before the percentage of the Rural Test Valley population within the NTV HMA was identified for each parish.
- 3.3.5 Wellow parish contains 11.63% of the Rural Test Valley population and therefore, a fair share of the annual Rural Test Valley housing requirement equates to 4.19 housing units. In order to understand what a 'fair share' of the rural housing requirement would have been for Wellow parish over the Test Valley Revised Local Plan period of 2011-2029, the annual figure is multiplied by 18. This suggests that a fair share of the rural area housing requirement would have been 75.35 dwellings, rounded up to 76.

**3.3.6** According to the Neighbourhood Plan evidence base, 36 dwellings were completed or had planning permissions at 31 March 2021. Therefore, between 01 April 2021 and 31 March 2029 there is a residual requirement for Wellow of 40 dwellings.

**3.3.7** To understand the housing requirement for Wellow over the period 2029 up to 2040 using this information we can extrapolate the fair share annual requirement of 4.19 dwellings identified in paragraph 3.3.5 over the residual 11 plan period years. This equates to an additional requirement of 46.09 dwellings, rounded up to 47 units.

**3.3.8** Therefore, over the proposed plan period of 2020-2040 a fair share housing requirement for the parish of Wellow using its identification as a Rural Test Valley village is a minimum of 87 units.

**3.3.9** A breakdown of the top-down apportionment calculation is set out in Table 2 below.

a)	<b>Wellow Parish Residents (2021 Census)</b>	<b>3,239</b>
b)	<b>Rural Test Valley (Northern HMA) Residents (2021 Census)</b>	<b>27,856</b>
c)	<b>% of RTV households in Wellow Parish</b>  <b><math>((a / b) * 100)</math></b>	<b>11.63%</b>
d)	<b>Annual RTV Housing Requirement</b>	<b>36</b>
e)	<b>Wellow Proportionate Annual Housing Requirement Growth (2011-2029)</b>  <b><math>(d \times 18)</math></b>	<b>76</b>  <b>(75.35)</b>

f)	<b>Housing Completions 2011 – 2021</b>	<b>36</b>
g)	<b>Residual Requirement (2021-2029)</b>  <b>(e – f)</b>	<b>40</b>
h)	<b>Projected Requirement (2029-2040)</b>  <b>(e / 18) * 11</b>	<b>47</b>  <b>(46.09)</b>
i)	<b>Wellow Proportionate Housing Requirement (2020 – 2040)</b>  <b>(g + h)</b>	<b>87</b>

*Table 2: Top-Down apportionment of housing needs utilising the adopted Rural Test Valley housing requirement up to 2040*

**Scenario 2: Top-down apportionment utilising the adopted Northern Test Valley housing requirement up to 2040.**

- 3.3.10 Scenario 1 provides a useful starting point in understanding the housing needs of Wellow up to 2040, however it does not account for the latest understanding or assessment of sustainability of Wellow acknowledged in the emerging Local Plan whereby the parish is identified alongside eight other parishes as the most sustainable locations to accommodate development following Andover and Romsey.
- 3.3.11 Therefore, it is considered that a more appropriate assessment is to use a top down apportionment of the Northern Valley housing requirement against the usual resident population for the period 2020-2040.
- 3.3.12 The 2021 Census data identifies that Wellow contains 3.75% of the usual resident population of the NTV area. Therefore, a fair share of the annual NTV housing

requirement for Wellow equates to 14.77 housing units and 295.41 dwellings, rounded up to 296 dwellings over the period 2020-2040.

**3.3.13** This assessment has not acknowledged the housing completions and planning permissions as of 31 March 2021 in the same manner as scenario 1 due to utilising a different starting point for the housing requirement figure and base date. However, the annual completion rate for Wellow parish up to 2021 was 3.6 dwellings and it would be appropriate to remove 4 dwellings from this requirement, equating to a requirement of 292 dwellings.

**3.3.14** Even if the 36 units were subtracted from proposed housing requirement figure for Wellow, 260 dwellings would still be required for the parish over the period 2020-2040.

**3.3.15** A breakdown of the top-down apportionment calculation is set out in Table 3 below.

a)	<b>Wellow Parish Residents (2021 Census)</b>	<b>3,239</b>
b)	<b>Northern Test Valley HMA Residents (2021 Census)</b>	<b>86,401</b>
c)	<b>% of NTV households in Wellow Parish</b> <b><math>((a / b) * 100)</math></b>	<b>3.75%</b>
d)	<b>Annual NTV Housing Requirement</b>	<b>394</b>
e)	<b>Wellow Proportionate Annual Housing Requirement Growth (2020-2040)</b> <b><math>((c/100) * 394)</math></b>	<b>14.77</b>



f)	Wellow Proportionate Housing Requirement (2020 – 2040) (e * 20)	296 (295.41)

*Table 3: Top-down apportionment utilising the adopted Northern Test Valley housing requirement up to 2040.*

**Scenario 3: Top-down apportionment utilising the emerging Northern Test Valley housing requirement up to 2040.**

- 3.3.16 Scenario 3 provides a further top-down apportionment assessment utilising the latest housing need information for the Test Valley as set out in the New Local Plan Regulation 18 Stage 1 document, including the updated percentage split between the two HMAs alongside the recognition of Wellow's sustainability.
- 3.3.17 The housing need split between the HMAs is proposed to change from a 57:43% split to 67:33% split alongside a reduction in the overall housing need to 10,820 homes (541 dwellings per annum).
- 3.3.18 As identified in Scenario 2, the 2021 Census data identifies that Wellow contains 3.75% of the usual resident population of the NTV area. Therefore, a fair share of the emerging annual NTV housing requirement for Wellow equates to 11.55 housing units and 230.93 dwellings, rounded up to 231 dwellings over the period 2020-2040.
- 3.3.19 This assessment has not acknowledged the housing completions and planning permissions as of 31 March 2021 in the same manner as scenario 1 due to utilising a different starting point for the housing requirement figure and base date. However, the annual completion rate for Wellow parish up to 2021 was 3.6 dwellings and it would be appropriate to remove 4 dwellings from this requirement, equating to a requirement of 292 dwellings.

3.3.20 Even if the 36 units were subtracted from proposed housing requirement figure for Wellow, 195 dwellings would still be required for the parish over the period 2020-2040.

3.3.21 A breakdown of the top-down apportionment calculation is set out in Table 4 below.

a)	Wellow Parish Residents (2021 Census)	3,239
b)	Northern Test Valley HMA Residents (2021 Census)	86,401
c)	% of NTV households in Wellow Parish $((a / b) * 100))$	3.75%
d)	Annual NTV Housing Requirement	308
e)	Wellow Proportionate Annual Housing Requirement Growth (2020-2040) $((c/100) * 308)$	11.55
f)	Wellow Proportionate Housing Requirement (2020 – 2040) $(e * 20)$	231 (230.93)

Table 4: Top-down apportionment utilising the emerging Northern Test Valley housing requirement up to 2040.

## 3.4 Summary

**3.4.1** The assessments of Wellow's local housing need utilise a top-down approach to understand what a 'fair share' housing requirement for the parish over the period 2020-2040, whilst also acknowledging the housing completions and planning permissions since 2011.

**3.4.2** It is considered that the Wellow should be identified a housing requirement of between 87 and 296 new homes over the period 2020-2040 which will help to sustain the vitality of the parish and address emerging socio-economic issues that are arising such as housing unaffordability, reducing school pupil numbers and ageing population.

**3.4.3** The local housing need assessment scenarios are set out below:

Scenario	Proposed Housing Requirement
<b>Scenario 1:</b> Top-down apportionment utilising adopted Rural Test Valley housing requirement up to 2040.	<b>87 dwellings</b>
<b>Scenario 2:</b> Top-down apportionment utilising the adopted Northern Test Valley housing requirement up to 2040.	<b>296 dwellings</b>
<b>Scenario 3:</b> Top-down apportionment utilising the emerging Northern Test Valley up to 2040.	<b>231 dwellings</b>

*Table 5: Summary of Local Housing Need Assessments for Wellow*

## 4 CONCLUSIONS

### 4.1 Summary

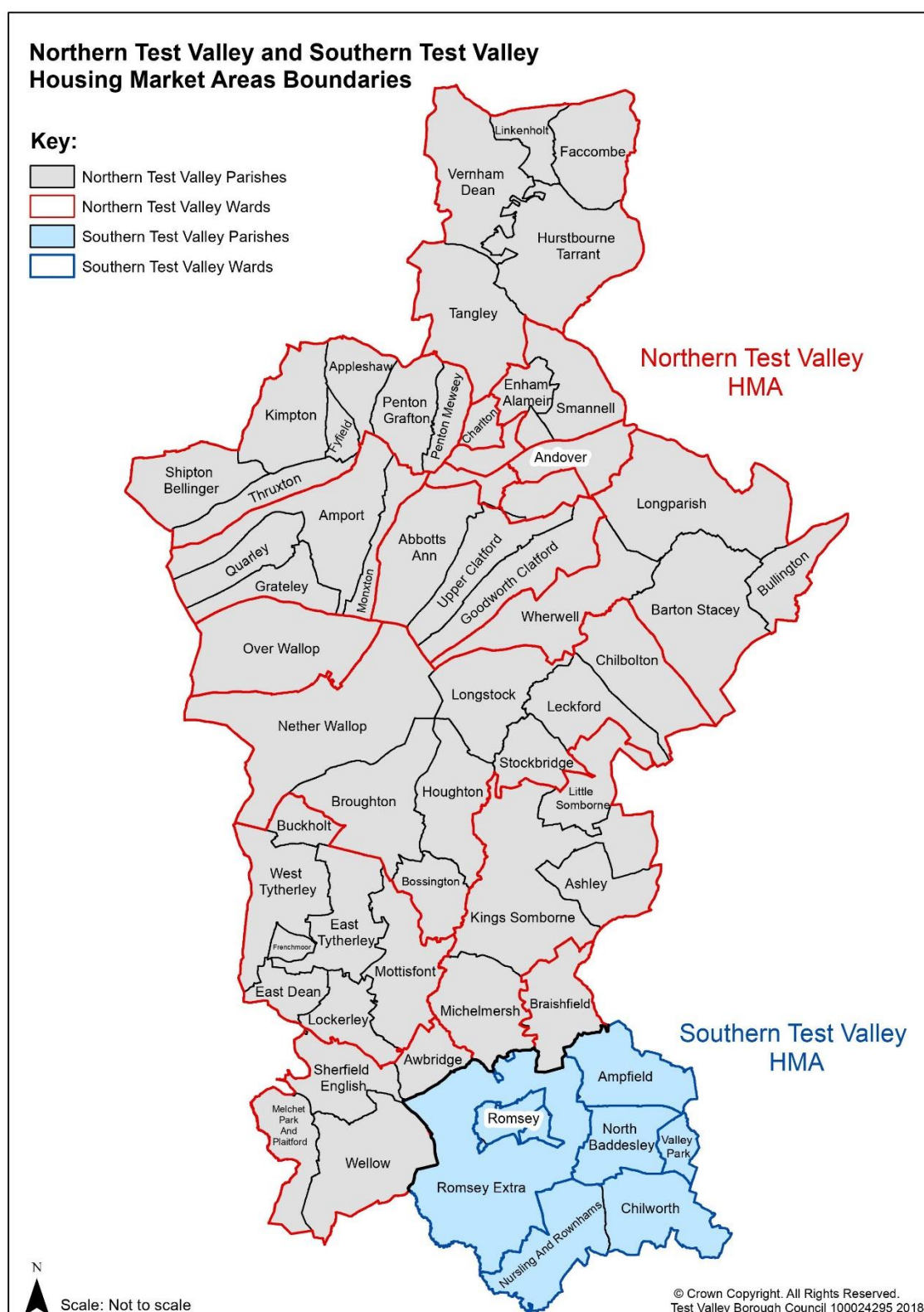
- 4.1.1** This report has been prepared to understand housing needs in Wellow parish between 2020-2040. The NPPF is clear that sustainable patterns of development including housing growth can help to support a prosperous rural economy enabling the retention and vitality of accessible local services and community facilities. However, the PPG highlights that people living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities.
- 4.1.2** Housing growth in Wellow parish can help sustain the vitality and viability of local services and facilities, including bus routes, shops, public houses and the primary school.
- 4.1.3** A top-down apportionment of housing needs for Wellow Parish utilising the resident population, adopted and emerging housing requirements for Test Valley Borough and the disaggregated needs for the Northern Test Valley and Rural Test Valley areas suggests that over the period 2020-2040 between 87 and 296 new homes should be delivered in the parish.

Scenario	Proposed Housing Requirement
<b>Scenario 1:</b> Top-down apportionment utilising adopted Rural Test Valley housing requirement up to 2040.	<b>87 dwellings</b>
<b>Scenario 2:</b> Top-down apportionment utilising the adopted Northern Test Valley housing requirement up to 2040.	<b>296 dwellings</b>
<b>Scenario 3:</b> Top-down apportionment utilising the emerging Northern Test Valley up to 2040.	<b>231 dwellings</b>

*Table 6: Summary of Local Housing Need Assessments for Wellow*

## 5 APPENDICES

### 5.1 Appendix 1: Parish Information



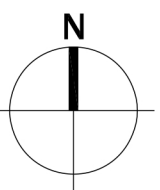
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## Appendix B: Site Context Plan





- Key:
- Site Boundary
  - Land within Applicants Control
  - Existing Vegetation to be retained
  - Developable Area [1.55 Ha]
  - Indicative Frontages
  - Public Open Space
  - Flood Zone 2
  - Flood Zone 3
  - Proposed Primary Roads
  - Proposed Secondary Roads
  - Indicative Tree Planting
  - Listed Building
  - Potential Site Access
  - Proposed Footpaths
  - Existing Public Right of Way
  - Potential Pedestrian Access
  - Existing Bus Stops



Project	West Wellow		
Title	Indicative Development Framework Plan		
Drawn by	CT	Issue Date	06/01/2022
Scale(s)	NTS @ A2	Drawing No	101



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