

2. Question to HTC. What is the evidence to justify the inclusion of sites allocated in Policy HUNG12 (Land at Smitham Bridge Road) and Policy HUNG13 (Land north of Cottrell Close) in the HNP, and the exclusion of the sites referenced HUN15 (Folly Dog Field) and especially HUN14 (Land at Salisbury Road)?

The process by which sites were identified, assessed against West Berkshire Council (WBC) HELAA criteria and the objectives of the Neighbourhood Development Plan (NDP) is explained in the Hungerford NDP Site Assessment Report, one of the documents submitted at Regulation 15.

All four of these sites passed the HELAA assessment (Stage 2), at least in part (i.e. at least part of the site areas assessed were potentially developable).

At Stage 3 (assessment against HNP objectives), each site was assessed and an overall rating given. These were assessed as follows:

- Land at Smitham Bridge Road (HUN7) – green (positive overall assessment)
- Land north of Cottrell Close (HUN20) – green (positive overall assessment)
- Folly Dog Field (HUN15) – pink (negative overall assessment)
- Land at Salisbury Road (HUN14) – green (positive overall assessment)

It was therefore considered that the 3 sites which had a positive overall assessment could proceed to consultation. Stage 4 of the NDP Site Assessment Report listed the 5 options of site combinations which were then the subject of public consultation. At this consultation, a clear preference was given to Option 1, which was the allocation of the Smitham Bridge Road and Cottrell Close sites. This formed the spatial strategy of the Regulation 16 NDP.

The Spatial Strategy was assessed in the Strategic Environmental Assessment (SEA), one of the documents submitted at Regulation 15. Section 6 (Assessing reasonable alternatives) considered all 5 options presented to the community. Table 6.1 summarises the assessment of the options. Whilst all options are assessed as having a negative effect on landscape, Option 1 scores favourably against the other four options. It is considered therefore that it represents a reasonable option to include in the Regulation 16 NDP. Paragraph 7.7 of the SEA states:

“Option 1 has therefore been identified as the preferred Option, reflective of the consultation responses set out above and the findings of the SEA. This was presented to the Hungerford Town Council who unambiguously agreed with this approach.”

3. Question to HTC. Policy HUNG12 allocates land for about 44 dwellings. The site is within the North Wessex Downs National Landscape. Please could the Council explain how the terms of NPPF paragraph 183 are met, especially the exceptional circumstances referred to in the paragraph (See Regulation 16 representations from WBC pages 76 and 87)?

Paragraph 183 of the December 2023 version of the NPPF states that consideration of applications should include an assessment of:

- a) *“the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) *the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

We consider each item a) to c) in paragraph 183 in turn.

a) Need and impact on the local economy:

Policy SP12 of the WBC Local Plan states that for NDPs in preparation, “it is necessary to identify sites to meet the following levels of development – Hungerford: approximately 55 dwellings.” A clear need is demonstrated for sites to be allocated in the Hungerford NDP to meet the housing delivery requirement.

The need for housing in Hungerford is demonstrated in the Hungerford Housing Needs Assessment and the West Berkshire Housing Needs Assessment Update. Both documents were submitted at Regulation 15.

The primary impact on local economy of not allocating these sites would be a lack of housing for local workers. This would be the same irrespective of which sites were allocated as none of the shortlisted site options would result in a loss of employment land and none were proposing to provide new employment land or buildings.

b) Developing outside the designated area or meeting the need in some other way:

The whole of the designated area of Hungerford and the hinterland well beyond the parish is within the National Landscape designation. To meet any housing needs outside the National Landscape would fail to meet the needs of Hungerford.

The only other potential way to meet the requirement would be to identify sites below the 10-dwelling threshold. However, through the multiple calls for sites that were documented in the Hungerford NDP Site Assessment Report, very few sites below the threshold came forward. Moreover, at the point at which decisions regarding site assessments needed to be made, no sites below the 10-dwelling threshold were available.

- c) Detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

The West Berkshire Landscape Sensitivity Assessment 2011¹ assessed the impact of development of the HUNG12 site. It noted that the site had potential for development, specifically stating on p18 that, subject to a series of recommendations, development “...would result in little harm to the natural beauty of the AONB”. The recommendations have been considered against the requirements of site allocation HUNG12:

Recommendation	Response
“Development on this site should be subject to the following conditions and protection and enhancement of the following features:”	
Hedgerow along the western boundary and the bank and hedgerow along North Standen Road	HUNG12e(i) requires protection and enhancement of the hedgerow along North Standen Road. HUNG12e(ii) requires protection of views from the west through ensuring that no rooftops are visible over the hedgerow. This clearly requires retention of the hedgerow along the western boundary.
Views from the west through ensuring that no roof tops are visible over the hedgerow. New tree planting to mitigate any impact would not be sufficient mitigation.	HUNG12e (ii). requires protection and enhancement of views from the west through ensuring that no roof tops are visible over the hedgerow.
Access from the north-east corner of the site	The boundary of the site assessed in the 2011 LSA extended at its north-eastern extent to meet Smitham Bridge Road, which would make this a potentially logical vehicular access point. The boundary of HUNG12 did not extend to Smitham Bridge Road, therefore this was not a possible option to provide access. HUNG12h requires access to be provided from North Standen Road whilst respecting its role as a gateway into the town. This should therefore ensure that the design of the access point minimises the visual impact.

Appendix A to the Hungerford NDP Site Assessment Report, one of the documents submitted at Regulation 15, references that North Weald AONB Unit considered development would not result in harm. Specifically it noted for HUN7 in the ‘Stage 2b Suitability’ worksheet that the site is “enclosed and naturally linked to the existing settlement edge.”

¹ https://westberks.gov.uk/media/36275/Hungerford-Area-of-Outstanding-Natural-Beauty-Landscape-Sensitivity-Assessment/pdf/West_Berks_AONB_LSA_Report_Hungerford.pdf?m=1565094036213

Development of the site would not result in the loss of public rights of way or public open space.

In terms of environmental impact, all sites are expected to meet West Berkshire Local Plan policy requirements, specifically Policy SP10 (Green Infrastructure), Policy SP11 (Biodiversity and geodiversity) and Policy DM40 (Public Open Space).

4. Question to HTC. What is the evidence to justify allocating HUNG12 for 44 dwellings as opposed to the development potential of 31 dwellings using the density of the West Berkshire Pattern Book Study (see the representations from WBC page 95). In addition, please direct me to the evidence to explain the basis on which the 12 dwellings allocated in Policy HUNG13 is justified?

The promoters of sites HUNG12 and HUNG13 both considered that the proposed dwelling requirements (which are approximate) were achievable. It is acknowledged that application of the WBC Pattern Book approach results in lower outputs for both sites. However, this is guidance and it was considered that there are two main factors relevant to Hungerford that would serve to increase the density of development from the flat 20 dwellings per hectare (dph) required of all edge of settlement sites in a National Landscape:

1. Hungerford is one of the largest and most sustainable settlements in the National Landscape area. It should be noted that the Inspector who examined the West Berkshire Site Allocations Development Plan Document in 2017² held at paragraph 30 that, *“On the evidence submitted it can be concluded that there is a need for housing in the AONB (which covers almost 75% of the District); that in terms of sustainability, Hungerford is an appropriate settlement to accommodate much of that need.”* Whilst the DPD has now been superseded, the principle is considered to still hold. A density of 20dph is too low. In this regard it is observed that the previous allocation of land east of Salisbury Road (HSA19) in the West Berkshire Site Allocations Development Plan Document 2017 required approximately 100 dwellings on a 5 hectare site. Applying the Pattern Book approach (60% developable area at a density of 20dph) would have meant that the site was expected to deliver approximately 60 dwellings. It was in fact allocated - and developed - at a density of over 33dph.
2. The expected mix of dwellings required to be delivered will be different to recent development in Hungerford, reflecting the need for smaller properties. Taking the development on land east of Salisbury Road as an example, Table 1 below shows the difference between the requirement in Policy HUNG1 and what was delivered on the site:

Table 1: Comparison of housing mix requirement in Policy HUNG1 and mix delivered on land east of Salisbury Road

No. of bedrooms	Hungerford NDP requirement (HUNG1)	Delivered on land east of Salisbury Road	Difference
1	22.7%	4.0%	+18.7%
2	15.8%	18.0%	-2.2%
3	29.9%	32.0%	-2.1%
4	22.1%	40.0%	-17.9%
5+	9.5%	6.0%	+3.5%

Table 1 shows that there is a significant difference in respect of 1- and 4-bed properties. If Policy HUNG1 had been in place, the proportion of the smallest (1-bed) properties delivered east of Salisbury Road would have been much higher and the large 4-bed properties, much lower. This would serve to increase the amount of development that could be achieved on site.

For sites HUNG12 and HUNG13, such an approach of delivering more smaller properties and fewer larger properties would be required with Policy HUNG1 in place, therefore the site yields would be higher than recent local examples.

Please see further comments below from the promotor of HUNG12.

Layout and Dwelling Mix:

The illustrative masterplan that was submitted as part of the further call for sites process in December 2022 (copy attached) showed a potential layout for a scheme of 34 no. dwellings based on a standard housing mix.

Donnington New Homes then subsequently reviewed the site capacity in the context of the Parish Council's proposed housing mix (set out in Policy HUNG1) and confirmed in our Reg 16 Representations (Paragraphs 3.1 – 3.2) that a scheme of approximately 44 no. dwellings broadly following the mix set out in Policy HUNG1 would be achievable on the site.

Our Client has not yet instructed its architect to work on a new scheme layout for 44 no. dwellings on the basis that they are content this approximate quantum can be delivered and will therefore seek to instruct its full project team following the confirmation of the allocation through the Neighbourhood Plan Examination process to prepare a planning application.

HUN9:
Proposed Permanent
Allotments

HUN7:
Proposed Housing and
Open Space Allocation

LAND WEST OF HUNGERFORD – CONCEPT PLAN

Density:

Donnington New Homes agrees with the Parish Council's approach to housing density. There is a clear and present need for new homes across West Berkshire and that need cannot be met in locations such as Hungerford without releasing appropriate sites in the National Landscape. Where sites are to be released the Framework 2024 is also clear that best use should be made of the land and in fact Paragraph 129 advises that planning policies and decisions should support development that makes efficient use of land. Paragraph 130 c) goes on to advise that local planning authorities should refuse applications which they consider fail to make efficient use of land.

The Parish Council's approach strikes the right balance between bringing forward development in a sensitive location that respects the National Landscape and the setting of Hungerford whilst also seeking to meet the needs of Hungerford and West Berkshire more generally. That approach is in full accordance with the terms of the Framework 2024 and the Government's core objective to significantly boost the supply of housing nationally.

6. Question to HTC. Why is it necessary to link the proposed development in Policy HUNG13 to the adjoining cemetery, given that there is no public right of way through it?

The cemetery is owned and operated by Hungerford Town Council and is open to the general public. Currently the access to the cemetery for pedestrians and vehicles is from the A338 on Eddington Hill.

A public right of way through the cemetery is an option, but it is open to the public, so access would be available. The Town Council prefers to retain control of the access as there could be a small risk of anti-social behaviours.

The pedestrian access between the proposed site HUNG13 and the cemetery provides two main benefits:

1. Residents of the site would not be in a cul-de-sac in terms of pedestrian access, so walking through the cemetery would provide an alternative route. This would improve the sustainability of the site by encouraging more walking, so for example, dog walkers could readily access Upper Eddington and the countryside west of the A338.
2. Pedestrian access to the cemetery would also be provided via Cottrell Close and HUNG13. This would be a more pleasant route for some, so avoiding the narrow footway on the A338, Eddington Hill.