

ASHBURN PLANNING LTD

PLANNING REPORT

**HOUSING GROWTH STRATEGY
FOR
HUNGERFORD
2015 - 2026**

Prepared on behalf of
Hungerford Town Council

by

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Foreword by the Mayor of Hungerford

For many years West Berkshire Council encouraged communities to express their views on local issues, including housing, by producing town and parish plans, and more than 70% of parishes did so. To this end a Town Plan was produced following much public consultation in 2010 by an independent group of town residents. Following further consultation this was refreshed and was adopted by West Berkshire Council in 2013. and set out the aims of the town in regard to where and how much development should take place in Hungerford. Furthermore, it set out which areas should be protected from new development, with the AONB's protection being of utmost importance.

It is very disappointing therefore that West Berkshire Council has now excluded all such community plans from consideration in the Local Development Framework production process, by amending their own Statement of Community Involvement ("the SCI") of 2006, which stated that such plans should "Set out a vision for how a local community wants to develop and identifies the actions needed to achieve it", yet defines them as a *"Non land use five year vision produced by and for local communities which includes an action plan"* in the 2014 version of the SCI

In its 2014 DPD "Preferred Options" report, West Berkshire Council presented two options for Hungerford. However, neither of these reflected the views of local residents as expressed in the 2013 Town Plan 'Refresh' which indicated that spreading development across several smaller sites within the town boundaries were preferred to that of developing a single, larger site outside the current confines of the town.

The Town Plan was produced by an independent group of individuals separate from the Town Council and was supported by over a 50% response rate to a community survey.

Hungerford Town Council recognised the importance and significance of the plan and public response to it, and decided it was in the town's best interest to employ professional planning consultants to produce its own plan of preferred sites which was submitted to West Berkshire Council as the town's response to the 2014 consultation.

This plan, and the community research underpinning it, demonstrates a "reasonable alternative" to that which West Berkshire Council has set out in the submission draft of the preferred options and Housing Site Allocations DPD, and on this point the Town Council considers that West Berkshire Council has failed to give due consideration to all the options for developing the town available to it, especially within the context of the AONB.

Given the recommendation of the Inspector, West Berkshire Council's Core Strategy commits to protecting the AONB, which states effectively that if the preparation of the Housing Site Allocations DPD indicates that there are insufficient developable sites to provide the balance of the 'up to' 2,000 dwellings whilst adhering to the landscape protection priority of the policy within the Core Strategy, any shortfall will be provided on sites allocated outside the AONB.

It now appears that West Berkshire Council has instead disregarded its duty to protect the landscape asset and promote the preference for developing a large Greenfield site to the south of the town and wholly in the AONB. This is contrary to the Town Council's approach which considers options less sensitive locations in the AONB; a brownfield site and infilling within the town settlement boundary.

This report sets out Hungerford Town Council's Housing Strategy for the Plan period to 2026 and indicates the localities where it wishes to see development, in accordance the views of the community as expressed in the Town Plan Refresh of 2013.

Cllr Martin Crane OBE

Mayor of Hungerford

HOUSING GROWTH STRATEGY

1 Introduction

The Brief

Ashburn Planning Ltd was commissioned at the end of 2012 by Hungerford Town Council to prepare a review of housing growth for the town in the context of the recent Town Plan Refresh. The planning authority, West Berkshire Council (WBC) adopted its Core Strategy in 2012 and expects to produce a Sites and Delivery Development Plan Document (SADDPD) which will identify development sites. The Town Council intends to assist WBC to ensure that appropriate levels and locations of housing are identified for Hungerford. This work would help inform the DPD process.

This report contains some information which will be familiar to members of the Town Council, whose local knowledge may well be superior to that of Ashburn Planning. However, it has been included to demonstrate the consultant team's understanding of local factors.

December 2015 update: Initially the residual housing requirement for Hungerford (the number of dwellings for which land would have to be found) was very much larger than it is now. This means that some of the sites Ashburn considered suitable at the time will not be needed to help meet requirements.

Meetings

Ashburn Planning attended the following meetings:

- On Tuesday 29 January with members of the Town Council and others
- On Wednesday 30 January at Hungerford Town Hall, the presentation by officers and members of West Berkshire Council on the Site Allocations and Delivery Development Plan Document (SADDPD)
- On Wednesday 20 March with members of the Town Council and others
- On Monday 15 April - a meeting of the Town Council at which a presentation was made promoting development to the north of the town
- On Wednesday 15 May with the Head of Education, West Berkshire Council and local head teachers.
- On Friday 14 June with Donnington New Homes (following initial meeting to discuss the Marsh Lane Allotments on in late May 2013).

- On 4th September 2014, a public meeting at the Town Hall to update public and seek informal views on housing strategy at that time.
- On 18th November 2015, a public meeting at the Town Hall to update public and seek formal views on housing strategy presented.

Documents

The following key documents have been taken into account and this report must be read in conjunction with them:

- The National Planning Policy Framework
- The adopted West Berkshire Core Strategy
- The Strategic Housing Land Availability Assessment (SHLAA)
- The Core Strategy Inspector's report
- The Hungerford Town Plan 'Refresh' 2013 Consultation
- The West Berkshire Housing Site Allocations Development Plan Document (DPD) submission draft October 2015 (and all previous versions)

Ashburn Planning has sought advice from officers at West Berkshire Council on both strategic and site-specific matters.

December 2015 update: One document not available at the time of writing is the yet to be published West Berkshire Annual Monitoring Report (AMR) for 2015, so some of the figures relied upon are from 2014. The new figures for housing supply which the AMR is expected to contain will almost certainly reduce the residual housing requirement figure for the AONB Policy Area. This may in turn have implications for the residual figure for Hungerford itself.

Site Visits

Site visits were carried out on Tuesday 5 March 2013. The results of Ashburn Planning's assessments are set out in Section 7.

2 Planning Legislation and Policy

The National Planning Policy Framework (NPPF)

The NPPF was issued on 27 March 2012. In the local context, the Inspector's report on the Core Strategy, published in July 2012, was delayed to take account of the NPPF.

Paragraph 14 sets out a presumption in favour of sustainable development, and paragraph 47 refers more specifically to meeting "the full, objectively assessed" needs for market and affordable housing.

Paragraph 115 refers to Areas of Outstanding Natural Beauty (AONB) and other designations, stating that: "great weight should be attached to conserving landscape and scenic beauty in these areas which have the highest status of protection in these respects".

Paragraph 116 states that planning permission should be refused for major developments except in exceptional circumstances, and, "where it can be demonstrated that they are in the public interest. Consideration of planning applications should include an assessment of the need for the development, the cost of and scope for development outside the designated area, and any detrimental effect on the environment and landscape".

Neither "major" nor "public interest" is defined. In this context we interpret "major" as meaning larger than the threshold of 10 dwellings commonly used by local planning authorities to distinguish between major and minor development; so that only sites HUN005, 007 and 022 as defined in the SHLAA and discussed in more detail below would fall into the category "major" for these purposes. We also interpret "public interest" in a wide sense, wider even than the outcome of the recent surveys, notwithstanding the high response rate, to include taking account of the needs of existing households and potential future households in the period up to 2026.

Ashburn Planning considers that the effect of paragraphs 115 and 116 taken together is therefore not to prevent development altogether in AONBs. Indeed, this is reflected in the housing provision figure in the Core Strategy for the AONB of up to 2,000 dwellings; it is most unlikely that a figure approaching 2,000 could be absorbed within the built up areas or settlement boundaries, and as a result, some development of greenfield sites will be needed.

We also consider that there is a tension between the main text of the NPPF on the subjects of the presumption in favour of sustainable development and meeting objectively assessed development needs on the one hand, and the emphasis on localism in the Ministerial foreword on the other.

In this context, however, we consider that localism is likely to be more influential than might otherwise be the case, for two reasons. First, the Inspector qualified the housing provision figure for the AONB by the words “up to”, thus acknowledging that it might not be possible to accommodate this number of dwellings without causing unacceptable harm to the AONB. Secondly, he also concluded that there was insufficient evidence to indicate how many dwellings should be assigned to each of the main settlements in the AONB. As a result, the capacity of each settlement to accommodate development would need to be determined by a bottom up approach in which local opinion may carry more weight.

The Development Plan

The National Planning Policy Framework reaffirms the importance of the development plan in the determination of planning applications. In West Berkshire the development plan now consists only of the adopted Core Strategy and the saved policies of the West Berkshire Local Plan.

The revocation of the South East Plan (SEP) took effect on 25 March 2013, and the relevant order also removed any remaining structure plan policies in the region except for a policy relating to Upper Heyford Airfield in Oxfordshire. One SEP policy remains – Policy NRM6 – which applies to the Thames Basin Heaths, in which housing provision is intended to be restricted for nature conservation reasons. Some of the relevant heathland areas lie in West Berkshire, and although Hungerford is not located in such areas, there may be an indirect effect if the capacity of West Berkshire as a whole to accommodate housing is as a result constrained.

As noted in the tender submission, the Core Strategy Inspector recommended an early review of the Core Strategy. At the meeting held on 30 January, Council officers referred in passing to this issue but gave no clear indication when a review might be carried out. The most recent version of the Local Development Scheme, which lists the development plan documents which a local planning authority intends to produce, and provides a programme and

timetable for each, was issued in May 2012, two months before the issue of the Inspector's report. It takes account of the prolonged Examination process,

but contains no commitment to or timetable for any review. Ashburn Planning sought advice in writing from the Council about its intentions but has received no reply.

When Ashburn Planning started its work, a legal challenge to the Core Strategy was heard in June 2013. However, the appellants withdrew it.

The Duty to Co-operate

The duty to co-operate is set out in the Localism Act 2011. There has been some debate about the applicability of the duty in relation to the stages the development plan process had reached in each local planning authority when the duty came into force.

Ashburn Planning's interpretation is that the West Berkshire Core Strategy had proceeded too far to be caught by the duty to co-operate at the time the duty came into force; but any review of the Core Strategy will be subject to it.

The availability of the DCLG household projections at district rather than county level diminishes the need for a strategic plan to distribute housing between districts, as the Structure Plan used to. At the same time, needs for housing arise from settlements rather than from administrative areas. Reading is fairly heavily constrained, and indeed substantial parts of the town's western suburbs lie in West Berkshire. Thus the issue of the amount and distribution of housing is one which, in the absence of a regional or county plan, can only be addressed by appropriate co-operation between the relevant local planning authorities.

Settlement Boundaries

Settlement boundaries have been in near-universal use in England for at least two decades as a means of controlling development in rural areas. They are accompanied by criterion-based policies which apply to areas within the settlement on the one hand and areas without on the other. Boundaries have almost always been drawn very tightly, often for example excluding development only slightly detached from the main built up area of a settlement, and excluding the rear parts of large gardens. The approach in West Berkshire is similar and can be seen in particular in the case of

Hungerford. West Berkshire Council is reviewing settlement boundaries. Boundaries will not be altered except to accommodate sites intended to be allocated for development.

3 Hungerford in Context

Spatial Portrait

Hungerford is the largest settlement and only town in the AONB Policy Area in West Berkshire. Hungerford Civil Parish has a population of 5,767 (2011 Census). The Core Strategy defines Hungerford in two ways: in terms of settlement hierarchy, it is a Rural Service Centre along with settlements such as Lambourn and Pangbourne; it is also defined as a town centre, along with Thatcham. Newbury is defined as a major town centre.

The vision for the town (Core Strategy, paragraph 4.39) refers to Hungerford as being “self-sufficient”; development will “respect the historic form of built development and the AONB”.

The area in which Hungerford is located is sparsely populated by the standards of south east England. The nearest town further north is Wantage (population 11,327), at a distance of 14 miles along the A338. Wantage is in the administrative district of the Vale of White Horse.

To the south of Hungerford along the A338, Salisbury is over 30 miles away. However, Marlborough (population 8,395) lies 10 miles to the west along the A4, and Newbury (population 31,331) 10 miles to the east, also via the A4. Both Marlborough and Salisbury lie outside West Berkshire and the South East region.

Marlborough offers retail facilities which are at least as good as those in Hungerford; those in Newbury are substantially better, not only for comparison goods which are not well represented in Hungerford but also for convenience goods in terms of a choice of major supermarkets. Swindon, located 20 miles to the north-west via the M4, provides an even greater range of shopping facilities.

Insofar as catchment areas can easily be defined, we conclude on the basis of the proximity of these other towns, their size and range of facilities, that Hungerford’s catchment area contains about 12,000 people altogether in a small number of parishes in Wiltshire as well as West Berkshire. The adjoining areas of Wiltshire (and indeed the nearest parts of Hampshire to the south and Oxfordshire to the north) all form part of the North Wessex Downs AONB in which development will continue to be severely restricted. Hungerford’s

catchment population is therefore unlikely to grow significantly, unless there is a significant change in planning policy and large scale extensions to existing settlements are found to be acceptable.

The implications of the above for the appropriate level of development in Hungerford are considered in the conclusions.

Hungerford, like some other small towns in AONBs, is washed over by the designation. This imposes a general constraint on all sides of the town (and in theory at least within it) and has almost undoubtedly contributed to maintaining a compact urban form, with a sharp transition to open countryside on the western, southern and eastern sides. In the last case, the AONB designation is reinforced by the presence of Hungerford Common.

The urban form is a little more dispersed and the settlement pattern more broken up to the north where the Kennet and Avon Canal, River Dun and River Kennet and their floodplains converge, and where their associated areas of nature conservation impose their own constraints.

Even here, however, development extends only as far as the junction of the A4 and B4192 to the west and about 500 metres east of the junction of the A4 and A338 (northbound). No part of Hungerford is more than about 8-900 metres from the centre of the town, defined for these purposes as the junction of High Street and Church Street. Hungerford is therefore in our opinion a "walkable" town, at least in terms of the distance from its edges to the centre, if not from one side to the other. However, any development on the edge of the town would approach the limit that many people would be prepared to walk to reach the town centre, especially given the topography of the area.

Hungerford is well served by rail on the London to Taunton line via Newbury. There are currently 24 trains a day to Paddington on a weekday with departures from about 0600 to 2300; the shortest journey time is 64 minutes.

Figures from the 2011 Census on method of travel to work are discussed below in Section 5.

Education

As indicated in the tender submission, Ashburn Planning regards education as a potentially important issue in the consideration of the appropriate level of new housing for Hungerford.

This section incorporates the information obtained at the meeting with West Berkshire's Head of Education and local head teachers on 15 May 2013.

Hungerford Primary School is the one such school in the town. It has a capacity of 392 pupils and a theoretical annual intake of 56 pupils. Education officers at West Berkshire Council earlier advised (telephone conversation 20 March 2013) that the school is over-subscribed and that in recent years 70 or more pupils have been admitted each year. At the meeting, the head teacher advised that only a "handful" of children at the school came from outside the town and confirmed that recent intake has been as high as 75 pupils a year. In Years 1 and 2, this has been handled by means of vertical groupings, that is, five mixed age classes of 30 pupils each. Similar arrangements will enable the school to cope with a continued intake of 75 as the year groups move through the school. Long term forecasting is difficult because primary school entrants in five years' time are as yet unborn.

Further afield, Chilton Foliat Church of England Voluntary Aided Primary School lies in Wiltshire, but only two miles from Hungerford. It caters for 90 pupils aged 4 to 11. The school's website makes no explicit reference to any cross border policy but states that primary age pupils come from both Wiltshire and West Berkshire. It also refers to a partnership at secondary level with both St John's Community College in Marlborough and John O'Gaunt School in Hungerford.

There is a primary school at Shalbourne, also in Wiltshire but about four miles to the south of Hungerford. No indication is given of its capacity, but on the basis of the staff numbers appears to be even smaller than Chilton Foliat. The school's website makes reference to its "official catchment area" which lists some very small settlements; however, it does not extend into West Berkshire. Kintbury St Mary's C of E Primary School is the nearest primary school to Hungerford within West Berkshire, at a distance of about three miles to the east. It has an annual intake of 20 pupils, but is being enlarged to form a fully-fledged 1 form entry school with an annual intake of 28-30 pupils, to cater for increasing local needs.

Great Bedwyn C of E Primary School is also in Wiltshire and is located about six miles south west of Hungerford. It currently has 212 pupils on roll.

There is also a primary school at Great Shefford, but since this is located further from Hungerford than the other outlying schools referred to it was excluded from further consideration.

At the meeting on 15 May it was acknowledged that none of these other schools could reasonably be expected to cater for needs arising in Hungerford.

At secondary level, John O'Gaunt School has a capacity to take 120 pupils a year, but in recent years has admitted in the order of 85. Not all of these stay on after Year 11, and the sixth form is small, currently consisting of 63 students out of total of 440 on roll. The school's capacity is 620 pupils, so the school therefore has significant spare capacity. John O'Gaunt's catchment area is extensive and includes Kintbury, and Lambourn, 8.6 miles to the north. However, education officers advise that many secondary age pupils in Lambourn instead attend King Alfred's School in Wantage. Wantage also lies 8.6 miles from Lambourn but forms part of a different education authority – Oxfordshire.

Some secondary age pupils living in Hungerford travel to Newbury, where there are three secondary schools and also a further education college. Two of the secondary schools, Trinity and Park House, currently have spare capacity. However, this is likely to be taken up by children arising from the substantial new housing development planned for Newbury. When this happens, Hungerford will be the first outlying area to be affected because of its distance from Newbury, and spare capacity at John O'Gaunt School will be needed for local pupils. The Head of Education advised that there was a range of options for Hungerford: to create an all age school on the John O'Gaunt site, to enlarge the existing primary school to three forms of entry, or to provide a new 1 form entry school.

The first option is referred to in the promotional material for a proposal to develop for housing land off Salisbury Road, whose proximity to both existing schools is considered to be an advantage. However, no further detail is provided, and the Head of Education advised that no discussions with the developers had taken place.

The Head of Education also considered that around 500 additional dwellings would be needed at Hungerford to support the provision of a new 1 form entry school.

In conclusion, the fact that the primary school is oversubscribed and the secondary school has spare capacity means that there is no obvious solution to the issue of education provision in the town. At the same time, the position on

education does not in itself point clearly to the number of new dwellings which should be provided for.

Pupil yields for varying levels of housing development, using West Berkshire Council's ratios, are set out in an Appendix (TBC). It is however difficult to make an accurate calculation of pupil yields for specimen levels of housing growth (e.g. 100 dwellings, 200 dwellings etc.) because of the relatively small number involved and the uncertainty of the dwelling mix. The ratios show (for example) that a five bedroom house is five times as likely to yield a primary age pupil than a two bedroom flat.

December 2015 update: John O'Gaunt School no longer has a sixth form.

Transport

Hungerford town centre is a Conservation Area. The protection of the High Street is considered vital for environmental and economic reasons. Many of the businesses depend on tourists and visitors and their enjoyment is becoming severely compromised by the amount of traffic on the High Street. A north-south bypass, whether passing to the east of the town or to the west, would inevitably have a serious adverse environmental impact, especially on the river valleys, so a substantial amount of traffic, both local and long distance, will continue to use the High Street.

The impact of 12,000 vehicles a day in terms of air quality, noise and pedestrian amenity is most felt along the narrow section of Bridge Street but affects the entire length of the A338 between the southern edge of the built up area to its junction with the A4. West Berkshire Council is likely to insist that any planning application for significant residential development must be accompanied by substantial environmental information. This would include a Transport Assessment which would have to take account of the Guidelines for Environmental Assessment of Road Traffic by the Institute of Environmental Assessment.

4 Housing Requirements

The Core Strategy

As already indicated, the Core Strategy makes provision for up to 2,000 dwellings in the AONB, out of a district total of 10,500 dwellings. It is also clear that the requirement has been partly met to a greater extent in the AONB Policy Area than the other policy areas. This is unsurprising; a high proportion of housing in areas where substantial growth is planned will be on large sites which have to be allocated through the development plan process, and even when the plan is adopted, take some time to bring forward. In extensive rural areas, in contrast, the total level of commitments can build up through the granting of large numbers of small windfall permissions, even where settlement boundaries are as tightly drawn as they are in West Berkshire.

In the AONB policy area, a substantial proportion of the requirement has already been completed or consists of sites with planning permission. The residual requirement stood at about 800 dwellings in the Core Strategy and is likely to be reduced still further if large brownfield opportunities such as at Compton obtain planning permission.

The degree of flexibility implied by the qualification "**up to**" attached to the housing provision figure of 2,000 dwellings for the AONB Policy Area is directly addressed in the Core Strategy.

The first bullet point of Policy ADPP5 states "***if preparation of the SADDPD indicates that there are insufficient developable sites to provide the balance of the 2000 dwellings whilst adhering to the landscape priority of the policy any shortfall will be provided for on sites outside the AONB***".

This is in our view crucially important in the present context.

The Head of Planning Policy (telephone conversation, 8 May 2p13) expressed the view that this only applies if the total housing requirement remains at 10,500. Any increase in the total requirement would necessitate a fundamental reconsideration of the distribution of housing.

Household Projections

Correspondence with DCLG showed that a 2010-based set of household projections, which had widely been expected to replace the 2008-based set in autumn 2012, would not be issued, and that a long term (ie 25 year) set of

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Housing Strategy for Hungerford

household projections would take into account the detailed results of the 2011 Census and not be available until 2014. Ashburn Planning checked the unrounded 2008-based projections running to 2033. Rounding them up to what we consider to be the appropriate level (the nearest hundred) indicates that the increase in the number of households in the period covered by the Core Strategy (2006 to 2026) is indeed 16,000 as the Inspector acknowledged, and the increase in the period 2011 to 2031 is 15,800.

However, the 2008-based projections to 2033 have been withdrawn from the DCLG website and were replaced on 9 April with a set running from 2011 to 2021. This indicates an increase of about 7,100 households in West Berkshire. If in the current absence of any information beyond 2021 it is assumed that the increase over a twenty year period will be in the order of twice 7,100, then this represents a reduction on the 2008-based set, but is still substantially more than the provision of 10,500 dwellings in the Core Strategy.

5 Other Demographic Matters

Ashburn Planning has examined some of the relevant data from the second main release of 2011 Census data at the end of January 2013. The enumerated population of Hungerford Civil Parish rose from 5,559 in 2001 to 5,767 in 2011, an increase of 208 or 3.7%. The number of households rose from 2,455 in 2001 to 2,600 in 2011, an increase of 145 or 5.9%. This means that average household size fell from 2.24 in 2001 to 2.22 in 2011.

Average Household Size

Average household size in Britain has fallen steadily for at least a century. There is however some debate about the extent to which this trend will continue.

Assuming however that the rate of decline will slow down, an average household size of 2.20 could be anticipated by 2026, the end of the period currently covered by the Core Strategy.

From this an estimate of the amount of housing needed to maintain the town's population at its 2011 level could be made. This would also need to take account of the likelihood that household size in new development will on the whole be slightly larger than average. Table CAS51 from the 2001 Census (the equivalent for 2011 is not yet available) showed that there were many more small households in large properties than large households in small properties. However, given the high cost and restricted availability of mortgages, it is less likely that new market housing will be under occupied, and Registered Social Landlords will ensure that households are matched to the housing available. Given the relatively small numbers involved, the population of the town would be maintained at 2011 levels by the provision of around 20 new dwellings.

Car Ownership

A comparison of the data from the 2001 and 2011 Censuses shows that car ownership increased from 1.35 cars per household to 1.41 cars per household in the intercensal period.

Travel to Work

The method of travel to work data from the 2011 Census show that the use of the private car for travel to work accounts for 62% of all journeys; travel on foot accounts for 16%, higher than the West Berkshire average of 9.4%. The high level of car use reflects the fact that a large proportion of Hungerford's

resident workforce works outside the town, and indeed it is understood that there is concern about the increasing extent of out-commuting.

The railway station and the good level of service it provides is undoubtedly a considerable asset to the town but the data show that travel to work by rail accounts for only about 4% of the total.

6 Housing Supply

The Strategic Housing Land Availability Assessment (SHLAA)

The SHLAA covers the whole of West Berkshire. It consists of a main report, published in March 2011 and a number of appendices, which list sites in various categories, not mutually exclusive. It uses the four policy divisions of the District, including the AONB, used in the Core Strategy to present information. This report has concentrated on sites listed in Appendix D (potentially developable sites), although some of the sites also appear in the lists in Appendix C (sites without planning permission and outside settlement boundaries). Appendix consists of sites assessed as not developable.

The SHLAA main report provides a summary of the capacity of sites for each of the four policy areas, and for individual settlements in them. In the case of the AONB Policy Area, figures are provided for nine settlements and "the rest". Of the grand total of 2,495 dwellings, the largest single figure is at Hungerford (720), although Chieveley, Compton, Hermitage, Kintbury and Pangbourne have potential capacity of 200 to 300 plus each.

In particular, the work on behalf of the Council on landscape by Kirkham, and that by LMS on behalf of the AONB Board, has been taken into account. Both Kirkham and LMS confined their attention to sites outside the settlement boundary. There was a major difference of opinion between Kirkham and LMS. Three sites, considered by Kirkham to be suitable for development in landscape terms, and unsuitable by LMS, have a nominal capacity of 405 dwellings. These are HUN005 to the north east of the town and HUN007 and HUN022 to the south. These are discussed in more detail below.

Figure 3.6 from the SHLAA shows that, when specific constraints such as the common, SSSI and SAC (the AONB is a universal constraint) are taken into account, that the SHLAA site cover just about every plausible opportunity in the edge of the town. It would be inappropriate in our opinion for any land along the A4 west of the B4192, or further east than site HUN005, to be developed. We would not expect the further call for sites to bring forward significant additional potential housing capacity; but would not wish to draw firm conclusions until any new sites are identified and can be evaluated.

A planning officer at West Berkshire Council advised (telephone conversation, 20 May) that the results of the Call for Sites which closed on 8 April were not yet available.

Five Year Supply

The NPPF (paragraph 47) requires local planning authorities to maintain a five year supply of land for housing, with a 5% buffer to help maintain flexibility and choice, except in areas where there has been persistent under-delivery of housing, in which a buffer of 20% is required. West Berkshire is not among such areas. In general, the absence of a five year supply will give LPAs fewer grounds to refuse applications and will, other things being equal, weaken their case in the event of an appeal.

The position in West Berkshire is set out in a document dated December 2012. It is based on the total housing requirement of the adopted Core Strategy - 10,500 dwellings, or 525 a year over the 20 year period 2006 to 2026.

The NPPF also allows local planning authorities to include windfall sites in the calculation of the five year supply. West Berkshire makes such an allowance. Ashburn Planning is satisfied in principle that it is legitimate for the Council to do so.

Ashburn Planning is also satisfied that the calculations in the document are mathematically correct. Table 4.4 shows a total supply over the five year period 2013 to 2018 of 3,059 dwellings, compared with a requirement of 2,717 dwellings. This means a supply of 5.6 years.

However, if the buffer of 5% is added to the requirement side, raising it to 2,853 dwellings, then this results in a 5.36 year supply. Table 6.2 includes three sites at Hungerford: Our Lady of Lourdes (HUN025, 14 dwellings), the Priory (HUN016, 41 dwellings) and land to the rear of the Three Swans Hotel (HUN024, 13 dwellings).

The Head of Planning Policy explained (telephone conversation 8 May 2013) that the five year supply is not calculated for areas smaller than the whole district. Any significant increase in the housing requirement arising from a review of the Core Strategy would, other things being equal, reduce the years supply figure. The figure of 5.36 years is as it stands not much above 5, so that any determined appellant is likely to dispute that figure by arguing (for example) that the windfall figure is too high (or should not be included at all), and that some of the identified land is not available.

7 Site Assessments

Introduction

Ashburn Planning carried out visits to all 26 sites depicted on Figure 3.6 from the SHLAA on Tuesday 5 March 2013. This included for the sake of completeness all the sites which the Council itself describes in the SHLAA summary tables (Appendix E) as undevelopable. The approach outlined here involves a process of elimination and categorisation.

First of all, twenty-four sites are included in the Council's schedule. The two exceptions are HUN025 and HUN026. HUN025 is the Our Lady of Lourdes site on Priory Road where at the time of the site visits, construction was well under way. HUN026 consists of recently completed development at Penny Farthing Close.

Of the remaining 24, only 15 have capacity figures attached. Of the other nine six are considered by the Council to be "not developable". The other three consist of site HUN010, HUN016 and HUN017. HUN016 is also well under construction, and site HUN017 involves redevelopment but no net gain in the number of dwellings. Both Kirkham, on behalf of West Berkshire Council, and LMS, on behalf of the AONB Board, accepted the Council's view on the six sites which the Council considered not developable. We concur with this view. The total capacity of the 15 sites is 594 dwellings, of which 85 dwellings are within the settlement boundary and 509 (on eight separate sites) outside. Kirkham and LMS focused on these eight sites.

Kirkham considered all the sites outside the settlement boundary potentially suitable for housing. In contrast, LMS considered only four of them, including the three largest (HUN005, 007 and 022, all greenfield sites), as unsuitable in landscape terms.

The four sites which LMS did not consider unsuitable have a capacity of only 90 dwellings. The largest of these, HUN020, is previously developed and was presumably considered not unsuitable on the grounds that redevelopment for housing would not have any additional adverse effect on the landscape.

Thus, when the sites within the settlement boundary are added to the ones of which LMS approved, a capacity of about 175 dwellings altogether results. Ashburn Planning's view of the appropriateness or otherwise of the LMS approach is set out below.

In the paragraphs below, the remaining sites are grouped as follows: within the settlement boundary; north and north-east; west; and south.

The merits (or otherwise) of individual sites are considered in this section; the implications for the total level of provision in Hungerford are considered in the following section.

Within the Settlement Boundary

This group consists of ten sites, excluding site HUN008 which although located within the settlement boundary has been grouped with five other sites on the western side of the town because of its location and proximity to them.

Site HUN009 forms part of the Protected Employment Area (PEA) around the station. West Berkshire Council considers it “not developable” for housing. We have no reason to disagree with this assessment but not because of its location in a PEA; rather, because of its specific characteristics. Site HUN010 in fact, does not appear in Appendix D to the SHLAA, nor is it identified on Figure 3.6.

Sites HUN013 and 014 are adjacent sites on the Charnham Business Park. In the Council’s view, the former is considered suitable for residential development; the latter not suitable.

We consider that neither is appropriate for housing. Both form part of a PEA. The Council has not given a clear indication of why different treatment of these two sites is justified. In our view the PEA status, which is the Council’s own policy, should not lightly be overridden. Any additional employment land would have to be allocated on greenfield sites and could, given the bulk and mass of commercial and industrial buildings, have considerably greater impact on the landscape in the AONB than housing. Also, the surrounding business uses, although recently established, would create a less than ideal residential environment where there are potentially superior locations for housing and no overriding need to meet a target.

Site HUN016 is, as indicated above, under construction.

Sites HUN017, 018 and 019 all involve redevelopment by or on behalf of the Sovereign Housing Association. Site HUN017 in fact results in no net gain in the number of dwellings.

Council officers advise that these schemes are in an advanced state of preparation.

Site HUN021 lies partly outside the settlement boundary but does not encroach on any of the designations which cover most of the river valley land the vicinity. It is in our opinion suitable for housing.

Site HUN023 also forms part of the Protected Employment Area around the station. This is a more diverse area than either of the other PEAs and in our opinion it is less important to safeguard land in employment uses here. Existing structures on this site have been demolished.

In our view it is suitable for housing. The Hungerford Station Development Brief (September 2012) prepared on behalf of the Town Council by Jackson Planning Ltd referred to residential development as part of a wide ranging package to bring about the regeneration of the station and its surroundings.

Site HUN024 consists of land to the rear of the Three Swans Hotel. We consider it suitable for housing but would expect West Berkshire Council to insist on appropriate design standards as the site is located in the Conservation Area. This site has been unused for many years and part of it already has permission for residential flats. The Station Development Brief identifies the site as residential / mix of residential and in practice is the only likely viable land use to develop the site.

The question of whether sites are suitable for housing is in our opinion separate from that of whether they should be allocated for housing. With the exception of HUN023, we consider that all of these sites should be treated as potential windfalls rather than as candidates for allocation in the SADDPD.

HUN023 is a key brownfield site, within the settlement boundary and well overdue for regeneration, along with the Oakes and St Johns Ambulance site about which surprisingly the WBC Housing Site Assessments DPD excluded the site as WBC considered it a protected employment area although there has been no employment activity on the site for many years and other undeveloped employment land exists elsewhere in the town.

Exclusion of the site on these grounds is inconsistent given the St Johns Ambulance site has permission for residential development. Furthermore, when compared, for example, to the allocation of another disused employment site COM004, Pirbright Institute, Compton. Here WBC states "Development on this site would provide the opportunity to develop a brownfield site which relates well to the existing settlement. The re-use of a brownfield site is a priority in national and local planning policy taking precedent over Greenfield." This comment is equally applicable to HUN023.

North and North-East

This group includes six sites: HUN004, and five contiguous but separate sites located north of the A4, east of its junction with the A338: HUN003, 005, 006, 015 and 020. All of them, even the previously developed sites, lie outside the settlement boundary. HUN004 is located off Upper Eddington, adjacent and to the west of the detached part of the settlement around the junction of the A4 and A338. Although it is more remote from the town centre by road than some of the other sites in this group, there is a public right of way along the eastern bank of the River Kennett leading to Eddington Bridge which would make access on foot to the town centre more direct. There are environmental constraints in terms of impacts on the river which would need to be managed. HUN004 is one of the sites which WBC considers not developable, as a result of its “poor” relationship with the rest of Hungerford, poor access and landscape sensitivity. Ashburn Planning does not regard these constraints as overriding and the site is considered to have potential for housing, including affordable housing.

Site HUN003 currently consists of the Bath Road Veterinary Surgery.

Site HUN005 is by some way the largest of these sites and consists of greenfield land. Tree planting, now fairly well established, has taken place on its northern and eastern sides, in anticipation of the site being promoted for allocation for housing through the SADDPD.

Sites HUN006 and 015 lie outside the settlement boundary but in our view have no overriding constraints.

Site HUN020 consists of a garden centre which is currently trading. The south east corner of site HUN020 is located about 1 kilometre from the centre of the town as defined above. This is slightly more than an ideal walking distance, probably reinforced by the perception of the often heavy traffic on the A4, which has to be crossed at some point in order to reach the town centre.

Members of the Town Council have themselves advised that the possibility of the provision of a shorter, safer and more pleasant pedestrian and cycle route from this area to the town centre across the River Kennet is extremely slight, as a result of the SAC designation and the exercise of fishing rights.

West

This group consists of six sites: three to the south of the railway (HUN001, 008 and 026), three to the north (HUN002, 011 and 012).

HUN001 is a greenfield site to the south of North Standen Road, and is considered suitable for development in landscape terms by both Kirkham and LMS. Its unobtrusive setting in the wider landscape leads us to concur with this view.

HUN008 consists of the Hungerford Trading Estate. At the time of the site visit it was busy and advertising one vacant unit. The units, of varying sizes, are in a single block. It is not known what operational difficulties might arise from this, but it does help to create a high plot ratio (the ratio of floorspace to total site area) which means that more land would almost undoubtedly be needed to provide the same amount of floorspace elsewhere.

Access to it from the A338 along Church Street and Smitham Bridge Road is poor for HGVs, and residential use might be more suitable for this reason. However, we do not recommend its allocation for housing at this stage.

HUN026, as noted above, consists of recently completed development at Penny Farthing Close.

All the sites to the north of the railway line are considered “not developable” by the Council. HUN011 consists of allotments, where on the day of the site visits there was considerable activity. Allotments constitute greenfield rather than previously developed land. Ashburn Planning is advised by the Town Council that there are about 100 plots. Access to HUN002 and HUN011 off Marsh Lane under the railway is poor, and it was not clear where satisfactory access to HUN012 could be obtained at all.

Ashburn Planning agrees with the Council’s view on all three sites. In our view the poor access to site HUN011 is a sufficient reason to discount it, but its present use as allotments, subject to clarification of ownership and the rights of allotment holders, is a strong secondary reason to avoid development if possible. It is understood that this area has been in use as allotments for three or four years only, following the development of allotments elsewhere in the town. Long term plot holders might be faced with the prospect of a second move in a relatively short time, with all the difficulties involved in improving soil fertility, and the moving of fixtures such as sheds, compost heaps, trees and fruit bushes.

Representatives of Hungerford Town Council and Ashburn Planning met representatives from Donnington Homes and Barton Willmore (Planning

Consultancy), to discuss the renewal of lease options on the Marsh Lane Allotments.

Omitted from the site analysis is Barrs Yard as shown on the plan as site 030, which is located south of the A4 and is currently occupied by a garden arts business. A planning application has been submitted for employment use as workshops. However, as it is outside the settlement boundary and therefore unlikely to achieve planning permission. In future it could function as housing or perhaps a workshop and residential shared use, although being adjacent to the river the environmental constraints would need to be addressed carefully.

South

This group consists of two sites, HUN007 and HUN022, located to the west and east of Salisbury Road respectively. Like HUN005, and for the same purpose, tree planting has taken place. In the case of HUN007, this is fairly well established and reinforces existing field boundaries to the west (adjoining Salisbury Road) and to the south. In the case of HUN022, planting is more recent and creates a boundary where none appears to have existed before.

Ashburn Planning estimates that the area of HUN007, net of the areas of planting, is in the order of 10.5 hectares. At a gross density of 30 dwellings per hectare, it could therefore accommodate about 315 dwellings.

However, at a density comparable to Kennedy Meadow, it could accommodate about 210 dwellings. The Council's own estimate of 250 dwellings falls between the two.

In our opinion, the effect of the planting is twofold: if the site were to be allocated, it is more likely to be allocated in its entirety rather than in part; at the same time, the planting militates against any further allocation of land to the south except possibly in the very long term.

In views from the south off the C class road leading from the A338 to Sanham Green, the existing edge of the built up area, consisting of the recent development at Kennedy Meadow and the older development on De Montfort Grove and Priory Road, is visible but not prominent. The development of site HUN007 would undoubtedly extend the built up area southward but would not in our opinion significantly adversely affect the view from the south.

However, a new roundabout access onto the A338 would also be required and street lighting extended along the ridge.

The development of site HUN022 would be fairly prominent on the landscape in view from the west and south west. This consideration is unaffected by the fact that the landscape belt on the western and southern sides of the site is not yet well established. Although site HUN022 would help to maintain a more compact urban form than the development of HUN007, this would not necessarily be of any great practical advantage. Access to the site would be from the existing roundabout on the A338 serving Kennedy Meadow. Furthermore, there would no shorter route than via this roundabout into the town for pedestrians and cyclists, taking into account the layout of the housing on Bourne Vale and Sanden Close. It is not known what scope there might be for pedestrian and cycle route along the existing access to the waterworks (covered reservoir) which is not (currently) a right of way.

8 Total Housing Provision

For the reasons outlined above, Ashburn Planning considers that there is limited scope for development at Hungerford if it were confined to sites within the built up area. If more development is required for any reason, then some sites outside the existing settlement boundary and in the AONB will be needed. Attention then shifts to the question of any additional constraints and the degree of specific harm to the landscape which might arise from the development of particular sites in the AONB which are otherwise suitable.

A general view (rather than focusing on the particular sites in the SHLAA) leads to the conclusion that land to the east of the town is unsuitable because of the presence of the common, and land in the valleys of the River Kennet and River Dun is unsuitable as nearly all of it lies in flood risk zone 3, the rest in flood risk zone 2, and much of it is designated as a SAC or SSSI.

A comparison of the three principal greenfield sites (HUN005, 007 and 022) is necessary. In terms of its likely impact on the levels of traffic on the High Street, HUN005 has distinct advantages over the other two. Four of the five principal destinations outside Hungerford would not involve using the High Street at all: in a clockwise direction, Marlborough and points west on the A4, Swindon via the B4192, the M4 and Reading along the A338, and Newbury eastwards on the A4. In contrast, the only destination from HUN007 and HUN022 which would not involve using the High Street is Salisbury, over thirty miles south of Hungerford and with no intervening settlement of any significant size. The High Street impacts are a key consideration as referred above.

However, HUN005 is situated further from both the primary and the secondary schools, whereas HUN22 is close and HUN007 closer still. The secondary school is beyond reasonable walking distance from HUN005 and there is no safe cycle route away from motor traffic. Trips to school would be by car unless buses were laid on; this would diminish the advantages of HUN005 in terms of general traffic.

Any planning application for these three sites would have to be accompanied by a Transport Assessment. Such assessments would not only review the capacity of relevant junctions and distribute traffic flows, but also consider the specific impacts of flows on the High Street.

A combination of sites within the settlement boundary, other sites, and the one greenfield site which LMS did not find unacceptable on landscape grounds

would yield a total of 175 dwellings. When added to recent completions and commitments, this would result in a total of about 250 dwellings, consistent with the survey results.

However this list includes site HUN008, the Hungerford Trading Estate, and site HUN020, currently occupied by the garden centre. These have an estimated combined capacity of 54 dwellings. HUN008 is, as already acknowledged, a Protected Employment Area. HUN020 is not so designated, but for the time being its use as a garden centre provides employment as well as a service to the town and surrounding area. In our opinion, nothing should actively be done to undermine the economic base of the town, and therefore neither of these sites should be allocated in the SADDPD for housing. At the same time, however, both sites would in our opinion be suitable as windfall developments were the employment uses to cease. It would be less difficult to relocate the veterinary surgery but again we would not advocate anything which might threaten existing beneficial uses which do not create significant environmental problems.

As indicated above, the Head of Education considers that about 500 new dwellings would be needed in Hungerford to require a new 1 form entry primary school with a capacity of 210 pupils (7 classes of 30 pupils each).

A figure of 500 is slightly less than the total capacity of all the SHLAA sites which West Berkshire considers potentially suitable for development. Ashburn Planning is aware that some development proposals have included a replacement or additional primary school to cater for a significantly increased number of primary age pupils in the town as a whole. However, the offer of additional school capacity in whatever form will not in itself not justify additional housing on a large scale; all other factors, including and especially potential impact of development of the AONB, must be taken into account.

9 Conclusions

The summary results of the SHLAA described above show that by far the largest single total for potential capacity in any named settlement in the AONB is at Hungerford. However, it does not follow that (for example) the residual requirement should be met by a proportionate approach in which it is apportioned by a commensurate amount in all settlements. Three factors support this. First, there is a considerable degree of strategic choice in that the residual requirement is only about one third of potential capacity.

Secondly (as acknowledged in Section 2), the Inspector remarked that there was no sound basis in the evidence for the Core Strategy to assign levels of development to particular settlements in the AONB.

Thirdly, and perhaps most importantly, the Inspector also made it clear that the housing provision figure for the AONB should be qualified by the words “up to”, meaning that if the SADDPD found that 2,000 dwellings could not be accommodated in the AONB for landscape or perhaps other reasons, provision would have to be made elsewhere.

The current Government approach to planning policy places considerable emphasis in boosting the supply of housing and maintaining a five year supply (NPPF, paragraph 47), and on remedial action to be taken if completions fall significantly below cumulative requirements. In our view, this approach has substantially less force in the AONB Policy Area in West Berkshire, reasons set out in Section 6. There is no obligation to provide 2,000 dwellings in the AONB, nor therefore any obligation on Hungerford (or any other settlement) to accommodate a commensurate or significant proportion of the residual requirement.

In our opinion, sites HUN005 and HUN007 have their merits, and they will undoubtedly be promoted vigorously through the development plan process by developers and their agents.

However, given the implications of Policy ADPP5, the background to education provision in the area, and potential traffic impacts on the High Street, we conclude that Hungerford Town Council would be justified in recommending to West Berkshire Council the allocation in the SADDPD of the following sites only, and not necessarily all of them:

HUN001: 40 dwellings

HUN003: 6 dwellings

HUN004: 30 dwellings

HUN006: 13 dwellings

HUN015: 10 dwellings

HUN023: 16 dwellings

Total: 115 dwellings

Site 30 could add a further 30 units.

The sites within the settlement boundary for which specific proposals have not yet been made should be regarded as potential windfalls. Such sites may not necessarily meet all the criteria of deliverability – suitable, available and viable – set out in NPPF footnote 11. All the SHLAA sites within the settlement boundary, including those already under construction, are listed below:

HUN016: 41 dwellings

HUN017: no net gain

HUN018: 2 dwellings

HUN019: 17 dwellings

HUN021: 7 dwellings

HUN023: 13 dwellings

Total:

80 dwellings

This provides a total of 195 dwellings which is consistent with the Town Plan and the wishes of the town. It is possible that further windfall sites will come forward which will add to the total.

December 2015 update:

The review of sites in Section 7 treated all sites on their merits. The relationship between the situation then and the situation now is similar to that between the SHLAA and sites subsequently allocated. In other words, not all sites which meet the criteria in the footnotes to paragraph 47 of the NPPF will

be needed to make up requirements. As indicated in the update to Section 1, the residual requirement for Hungerford is much less than it was in early 2013.

Any merits of West Berkshire's proposed allocation, Site HUN007, are substantially diminished by the reduction in the residual requirement, since it is now possible to accommodate the reduced requirement without resort to a large site in the AONB in an exposed location.

Hungerford Town Council's alternative strategy does include Site HUN005, but only a small part of it, so that any adverse landscape impacts would be much reduced.

The other significant change is that Site HUN020 is being promoted for residential development, which means that it can reasonably be included in a list of potential allocations.

In conclusion, the combination of sites promoted in the Town Council's formal response to consultation reflects the changed circumstances of the reduced residual requirement. In some cases it carries forward the advice given in the 2013 version of this report (especially in respect of Site HUN001), and in other cases takes account of the changed circumstances of particular sites (for example Site HUN020).

Appendix 1

Meeting held on Wednesday 15 May at John O’Gaunt School

Attendees:

Ian Pearson	Head of Education, West Berkshire Council
Suzanne Taylor	Head Teacher, Hungerford Nursery School
Andrea Griffiths	Head Teacher, Hungerford Primary School
Jane Butler	Deputy Head Teacher, Hungerford Primary School
Sarah Brinkley	Head Teacher, John O’Gaunt School
Martin Crane	Mayor of Hungerford
Richard Hudson	Hungerford Town Council
Robert Megson	Director, Ashburn Planning
David Crofts	Associate Director, Ashburn Planning