

Hungerford Town Council

**Hungerford Neighbourhood Plan
Site Assessment Report**

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1 INTRODUCTION

- 1.1 This report explains how the Hungerford Neighbourhood Plan Steering Group (HNPSG) assembled, assessed and presented Hungerford Neighbourhood Plan (HNP) site allocation options to the community in November 2023. This process ultimately led to the identification of a preferred site option for inclusion in the HNP Pre-Submission (Regulation 14) Consultation Version.
- 1.2 This report is intended to support the consideration of the sites allocated in the HNP in respect of their potential environmental impact. In this regard it is an input to the process of preparing the Strategic Environmental Assessment (SEA) which accompanies the HNP.
- 1.3 The process is split into three main stages:
 - i. Approach
 - ii. Assessment of sites
 - iii. Consideration of site options
- 1.4 We address each of these stages in turn in the following sections.

Policy context

- 1.5 An important part of the exercise in a neighbourhood plan context is to understand the scale of development that is required to be addressed through neighbourhood plan allocations. When the development of the HNP commenced in 2018, the HNPSG sought to engage with officers at WBC to ascertain the extent of development that the HNP should provide for. At this time, a review of the West Berkshire Local Plan had been commenced but was at an early stage. However, as directed by national Planning Practice Guidance, local planning authorities should seek to provide a housing figure where there is appropriate evidential justification for the figure provided. In this case, WBC had commenced work on its housing requirements that was informing the review of the West Berkshire Local Plan and was able to provide a minimum housing requirement for Hungerford, supported by evidence. At the time, that figure was a minimum of 55 dwellings over the plan period.
- 1.6 Since this time, the West Berkshire emerging Local Plan Review has been subject to public consultation at Regulation 18 and Regulation 19 stages. Policy SP15 of the Submission Version Plan identifies the requirement for Hungerford to deliver a minimum of 55 dwellings over the plan period through the HNP. In March 2023 the Plan was submitted to the Secretary of State for independent examination. That examination is ongoing, with public hearings expected to be held early in 2024. More information can be found here: <https://www.localplanservices.co.uk/westberkshirelpr>. The minimum figure of 55 dwellings is therefore considered, for the purpose of neighbourhood plan-making, to be a robust figure on which to base allocations in the HNP.

2 APPROACH

- 2.1 A three-stage approach was taken to arrive at the shortlisted site options for the HNP that were presented to the community in November 2023:
- i. Stage 1: Housing and Economic Land Availability Assessment (HELAA)
 - ii. Stage 2: Assessment against the objectives of the Hungerford Neighbourhood Plan
 - iii. Stage 3: Deriving reasonable spatial options

Stage 1: HELAA

- 2.2 The purpose of the HELAA is to inform West Berkshire Council's (WBC) local plan-making processes and specifically the sites that will contribute to meeting the housing and economic requirements established in the Local Plan Review. The HELAA commenced with a Call for Sites by WBC. This was first undertaken between December 2016 and March 2017 and then re-opened between November and December 2018.
- 2.3 The Call for Sites process that informed the HELAA resulted in a total of 11 sites being put forward in the parish of Hungerford (this is the same area as the designated Neighbourhood Area for the HNP). These sites were assessed by WBC officers through the HELAA to ascertain whether they were available, suitable, achievable and deliverable. Full detail about the methodology for the HELAA assessment is presented here: <https://www.westberks.gov.uk/helaa>.
- 2.4 In September 2018, Hungerford Town Council published its own Call for Sites. As part of this public process it wrote to all the main landowners in the parish. As a result of this, a number of sites were put forward. With the exception of 3 sites, all were sites that had already been assessed through the HELAA process. These 3 new sites - HUN15, HUN16 and HUN17 – were then the subject of a HELAA assessment by the HNPSG's consultant. The assessments were reviewed by WBC officers to ensure they were consistent with the other HELAA assessments.
- 2.5 For various reasons unrelated to the site assessment process, there was a delay in taking forward site options through the HNP. The result was that in November and December 2022, a second Call for Sites was undertaken by the HNPSG. This resulted in a further 11 sites being submitted for consideration, including some sites that had subsequently been submitted to WBC through its HELAA process. Again, where these hadn't been assessed by WBC officers, they were subject to a HELAA assessment by the HNPSG's consultant.
- 2.6 In summary a total of 25 sites were put forward and considered through the Stage 1 process.

Stage 2: Assessment against HNP objectives

- 2.7 The purpose of the Stage 2 assessment was twofold. First it was to identify the most sustainable options when set against the context of Policy SP15 in the West Berkshire Local Plan Review for Hungerford (and the HNP) which requires the allocation sites to deliver a minimum of 55 dwellings over the plan period. The list of sites that were identified through the Stage 1 process as being potentially developable had a collective housing capacity far in

excess of the dwelling requirement. It was therefore necessary and appropriate to identify a shortlist of sites that would clearly enable the requirement to be met in a sustainable manner.

- 2.8 The second purpose of the assessment was to consider which sites could make the greatest contribution towards achieving the objectives of the HNP. From the relevant objectives in the HNP¹, a series of criteria were devised to assess each of the sites. These are shown in Table 2.1.

Table 2.1: HNP criteria used to undertake stage 2 assessment of sites

No.	HNP Objective	Criteria
1	A. Allocate sites to meet the housing requirements in the West Berkshire Local Plan to 2041, where possible making best use of previously developed land and minimising encroachment into the countryside.	a. Is the site greenfield or brownfield?
		b. What is the relationship to the existing settlement boundary (within, adjoining or separate)?
		c. Is the site adjacent to other proposed sites?
		d. Is the developer's proposed housing density appropriate for the site?
2	P. Protect the landscape around Hungerford and support the charities and agencies which are responsible for its conservation	a. Would the site result in harm to the natural beauty and special qualities of the AONB?
		b. Is development appropriate in the context of the existing settlement form, pattern, and character of the landscape?
3	B. Ensure that housing development provides a range of house types, sizes and tenures that meets the needs of all age groups and incomes	a. Does the site contribute in a balanced and appropriate way to meeting the overall Housing Needs Assessment?
		b. Is there a reasonable prospect of it providing some self-build or a community housing scheme?
4	F. Minimise the effects of traffic in the town centre and especially the High Street for the benefit of pedestrians and all road users	a. To what extent would the site cause an increase in traffic on the High Street and Bridge Street?
5	G. Increase walking and cycling in the town <i>(NB distances and elevation changes will be measured from site centre)</i> H. Encourage public transport usage to and from the town	a. Is the site within a reasonable walking distance, providing a safe route for residents of all ages and mobilities, to:-
		The town centre (measured from the Town Hall)?
		Hungerford Primary School?
		John O'Gaunt Secondary School?
		Nursery School/Health Centre?
		b. Is the site served by public transport within reasonable walking distance?

¹ Where site allocations could not reasonably make a contribution towards achieving an objective, that objective was excluded from the assessment framework

No.	HNP Objective	Criteria
6	N. Protect and enhance the appearance and historic environment of the town and parish	a. Would development of the site have a detrimental effect on neighbouring heritage properties or the Conservation Area?
		b. Does the site re-use or redevelop a currently poorly maintained building?
7	D. Encourage businesses and support initiatives, including those which promote a vibrant high street and increase the range of shops, services and eating places in the town for the benefit of residents, tourists and visitors of all ages. Recognise that Hungerford acts as a service centre providing facilities to neighbouring villages. E. Promote an increase in the number and quality of employment opportunities within the town.	a. Does development of the site create new or remove existing retail, leisure or commercial space?
8	I. Protect and maintain existing public playgrounds and open spaces to a high standard and look at ways of increasing the range of facilities provided as the town grows	a. Does development of the site cause the loss of, or encroachment onto, any formal or informal public amenity or green space?
		b. Does the site provide public open space in addition to existing policy requirements?
9	R. Reduce carbon emissions with more energy efficient buildings.	Does the site offer particular opportunities for low / no carbon emissions homes or community energy generation schemes?
Overall Summary		

2.9 For each of the criteria, the sites in Stage 2 were assessed. A commentary was provided against each criterion and an assessment of its likely impact was given via a colour-coded system (see below).

Significantly Positive
Positive
Uncertain
Neutral
Negative
Significantly Negative

2.10 The overall summary for each site then provided a commentary on the most relevant impacts (positive and negative) and gave an overall assessment using the colour-coded system. This assessment was a judgement of the particular issues and opportunities and their likelihood

of being mitigated or delivered. It did not represent a scoring system whereby a certain number of colours resulted in a particular colour for the overall summary.

Stage 3: Deriving reasonable spatial options

The sites that were considered to have either positive or significantly positive overall impacts were then to form the basis of the public consultation on site options. The basis of deriving spatial options was that any option had to meet the minimum requirement of 55 dwellings. It was also appropriate to present all the reasonable combinations of sites whereby this requirement could be met.

3 ASSESSMENT OF SITES

Stage 1: HELAA

3.1 25 sites were put forward through the Call for Sites processes. These were as follows:

- HUN3: Former Oakes Brother site
- HUN4: 15 Chestnut Walk
- HUN5: Land at Priory Road
- HUN6: Smitham Bridge Industrial Estate
- HUN7: Shalbourne River
- HUN8: Adjacent to Pennyfarthing Close
- HUN9: Land off Smitham Bridge Road and Marsh Lane
- HUN10: Adjacent to Church
- HUN11: 4 Bath Road
- HUN12: Land west of Salisbury Road
- HUN14: Land east of Salisbury Road
- HUN15: Follydog Field
- HUN16: King Field (all)
- HUN17: King Field (part)
- HUN18: The Paddock, Marsh Lane
- HUN19: Land at Strongrove Hill
- HUN20: North of Cottrell Close
- HUN21: River Field
- HUN22: Ramsbury Estate – north of A4
- HUN23: Ramsbury Estate – south of A4
- HUN24: East of Inkpen Road
- HUN25: West of Inkpen Road
- HUN26: Marsh Lane (triangle)
- HUN27: Dobbies Garden Centre
- HUN28: Stirland Garage

3.2 The HELAA assessment of sites resulted in the following categorisation of each site:

- i. Potentially developable (or potentially developable in part)
- ii. Not developable within the next 15 years
- iii. Not available.

3.3 The categorisation of some sites changed throughout the process, specifically due to the fact that their availability had changed. Also, some sites were removed from the process due to the fact that they had received planning permission. These sites were:

- HUN3: Former Oakes Brother site - received planning permission for residential development
- HUN4: 15 Chestnut Walk - received planning permission for residential development
- HUN11: 4 Bath Road - no longer available.
- HUN27: Dobbies Garden Centre - not available due to the requirement for the existing garden centre to move but no evidence provided as to the achievability of such a move, based on the preferred location.
- HUN28: Stirland Garage - no longer available.

3.4 As shown in Table 3.1, the HELAA assessment of the remaining sites concluded the following:

Table 3.1: Summary of findings of HELAA assessment

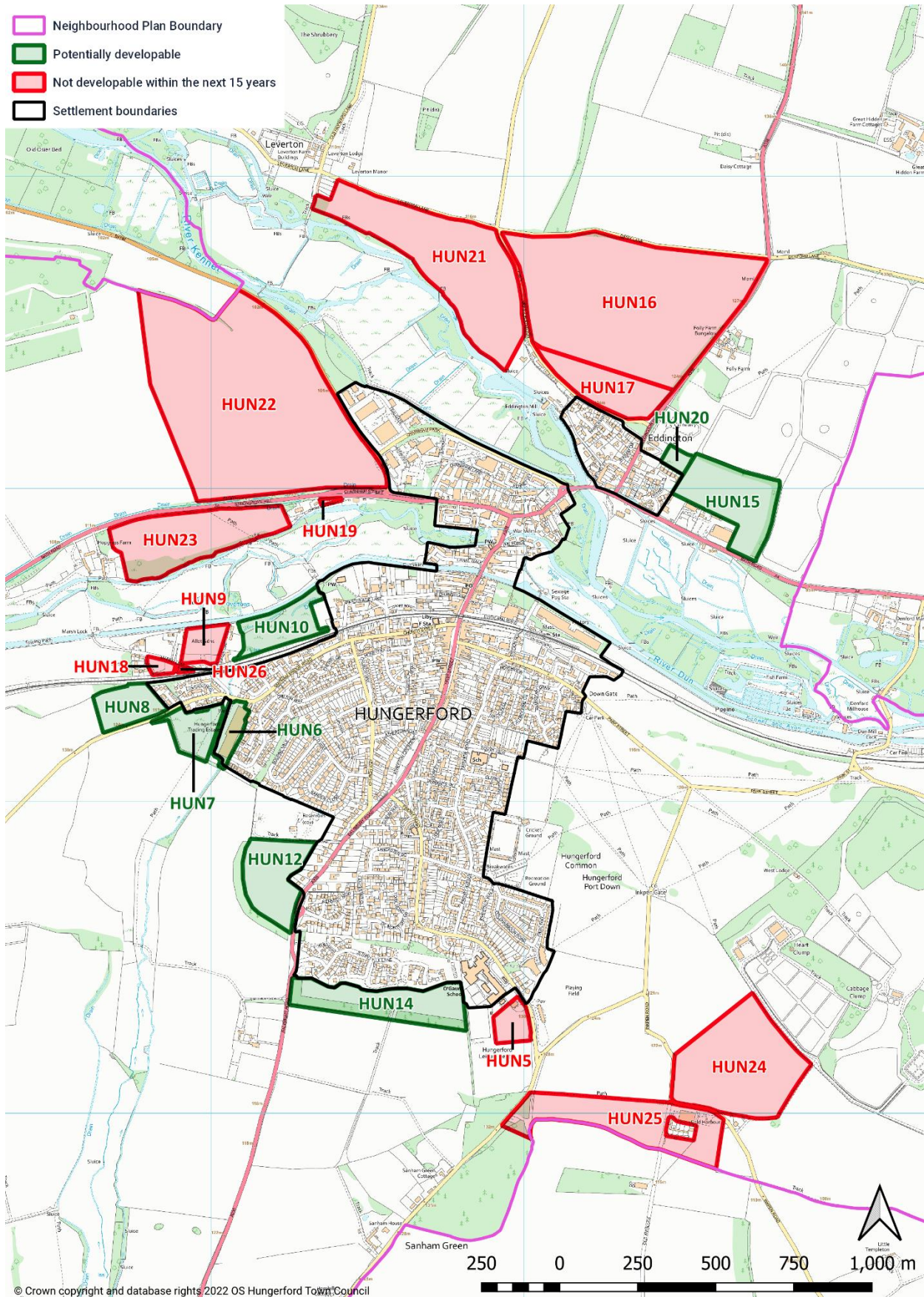
Site	Overall assessment	Proceed?
HUN5: Land at Priory Road	Not developable in the next 15 years - unsuitable	No
HUN6: Smitham Bridge Industrial Estate	Potentially developable in part	Yes
HUN7: Shalbourne River	Potentially developable in part	Yes
HUN8: Adjacent to Pennyfarthing Close	Potentially developable	Yes
HUN9: Land off Smitham Bridge Road and Marsh Lane	Not developable in the next 15 years - unsuitable	No
HUN10: Adjacent to Church	Potentially developable in part	Yes
HUN12: Land west of Salisbury Road	Potentially developable in part	Yes
HUN14: Land east of Salisbury Road	Potentially developable	Yes

Site	Overall assessment	Proceed?
HUN15: Follydog Field	Potentially developable in part	Yes
HUN16: King Field (all)	Not developable in the next 15 years - unsuitable	No
HUN17: King Field (part)	Not developable in the next 15 years - unsuitable	No
HUN18: The Paddock, Marsh Lane	Not developable in the next 15 years - unsuitable	No
HUN19: Land at Strongrove Hill	Not developable in the next 15 years - unsuitable	No
HUN20: North of Cottrell Close	Potentially developable	Yes
HUN21: River Field	Not developable in the next 15 years - unsuitable	No
HUN22: Ramsbury Estate - north of A4	Not developable in the next 15 years - unsuitable	No
HUN23: Ramsbury Estate - south of A4	Not developable in the next 15 years - unsuitable	No
HUN24: East of Inkpen Road	Not developable in the next 15 years - unsuitable	No
HUN25: West of Inkpen Road	Not developable in the next 15 years - unsuitable	No
HUN26: Marsh Lane (triangle)	Not developable in the next 15 years - unsuitable	No

3.5 The full HELAA assessments for all the site listed in Table 3.1 is provided in Supporting Appendix A to this report.

3.6 The long list of sites and their assessment are shown in Figure 3.1.

Figure 3.1: Map showing location of sites



Stage 2: Assessment against HNP objectives

- 3.7 The eight sites that were considered by the HELAA assessment to potentially be developable were then subject to the Stage 2 assessment.
- 3.8 Table 3.2 provides the overall summary assessment of each of the eight sites.

Table 3.2: Overall summary of the Stage 2 HNP assessment

Site	Overall summary assessment
HUN6: Smitham Bridge Industrial Estate	The site is designated as an existing Protected Employment Area and, based on the activity in the adjacent units, there is little evidence of a lack of demand for such units. The proposal to redevelop one half of a larger commercial unit appears unrealistic and would result in residential units immediately adjacent to light industrial activity, with associated issues for the amenity of both commercial and residential occupiers.
HUN7: Shalbourne River (land at Smitham Bridge Road)	The site is well located between existing built-up parts of the town and has good potential for development along with open space along the eastern boundary. Any development should ensure that it is not higher than the existing tree belt on the western boundary, in order to protect the character of the landscape. The site is large enough to make a meaningful contribution towards a range of housing needs but, being on the edge of town, is not well located to access shops, service and the secondary school.
HUN8: Adjacent to Pennyfarthing Close	The proposed use of the site for allotments would not have any detrimental impacts and allotments would represent a positive community use. However, the availability of the site is predicated on site HUN9 being allocated for residential use and this is presently an active allotment space. Therefore the net benefit of this site as a community use would be low.
HUN10: Adjacent to Church	A marina use could have detrimental effects on the tranquil nature of the valley landscape, as well as on local heritage assets and on the SSSI. Significant further assessment would be required to consider this fully.
HUN12: Land west of Salisbury Road	The site has significant potential to address Hungerford's housing needs. However, its location on the edge of the town and relative distance from many key services and facilities may mean it is less attractive to older people. This distance and the topography also means that more trips will be taken by car. The site does encroach into the open countryside and would have an impact on the AONB, particularly on the southern portion where the land is more visible. Any development would have to mitigate such impacts which would be likely to significantly reduce the area given over to built development.
HUN14: Land east of Salisbury Road	The site has significant potential to address Hungerford's housing needs. However, its location on the edge of the town and relative distance from many key services and facilities may mean it is less attractive to older people. This distance and the topography also means that more trips will be taken by car. The site would form an extension of the settlement into the countryside but the retention of the existing tree belt would mitigate further significant impact.

Site	Overall summary assessment
HUN15: Follydog Field	The site would expand the small village of Upper Eddington, rather than Hungerford town. It has a limited relationship with the settlement boundary. Its location separate from Hungerford town and relative distance from many key services and facilities may mean it is less attractive to older people. This distance and accessibility also means that more trips will be taken by car. Development of the whole site would have a detrimental impact on the AONB and the Kennet and Lambourn Floodplain SAC and River Kennet SSSI would be vulnerable to both direct impacts from construction and changes to hydrology. As such, development of the whole site would be unsustainable. Limited development of part of the site adjacent to the Garden Centre up to level with the line of Cottrell Close may be acceptable, however the community benefits that the scale of such a site could deliver would be more limited.
HUN20: North of Cottrell Close	The site would expand the small village of Upper Eddington, rather than Hungerford town. However, it is adjacent to the settlement boundary. Its location separate from Hungerford town and relative distance from many key services and facilities may mean it is less attractive to older people. This distance and accessibility also means that more trips will be taken by car. The site does encroach into the open countryside although careful design should ensure it does not have an impact on the AONB. Provided that any harm to the adjacent listed building is less than substantial, there are no other impacts and the site would make a clear contribution towards meeting Hungerford's housing needs.

Key

Significantly Positive
Positive
Uncertain
Neutral
Negative
Significantly Negative

3.9 The detailed assessment of the eight sites is provided in Supporting Appendix B to this report.

3.10 Of the eight sites assessed, three were considered to have the potential to deliver positive impacts when assessed against the HNP's objectives:

- HUN7: Shalbourne River (now known as land at Smitham Bridge Road) – minimum of 44 dwellings.
- HUN14: Land east of Salisbury Road (now known as land at Salisbury Road) – minimum of 65 dwellings.
- HUN20: Land north of Cottrell Close – minimum of 12 dwellings.

3.11 These three sites in combination, could deliver the West Berkshire Local Plan Review requirement for a minimum of 55 dwellings.

Stage 3: Deriving the spatial options

3.12 The three sites that were shortlisted through the Stage 2 process were then put together in all the combinations whereby the 55-dwelling minimum figure could be achieved. These combinations were as follows:

Option	No. of dwellings
1. Land at Smitham Bridge Road (44 dwellings) + land north of Cottrell Close (12 dwellings)	56
2. Land at Salisbury Road only (65 dwellings)	65
3. Land at Salisbury Road (65 dwellings) + land north of Cottrell Close (12 dwellings)	77
4. Land at Smitham Bridge Road (44 dwellings) + land at Salisbury Road (65 dwellings)	109
5. Land at Smitham Bridge Road (44 dwellings) + land at Salisbury Road (65 dwellings) + land north of Cottrell Close (12 dwellings)	121

3.13 These sites, along with the potential positive and negative impacts, were presented to the community.

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