


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	Your details	Agent's details (if applicable)
Title:	Mr	Ms
First Name:*	Philip	Kimberley
Last Name:*	Simmons	Parry
Job title (where relevant):	Land Manager	Principal Planner
Organisation (where relevant):	Donnington New Homes	Neame Sutton
Address* <i>Please include postcode:</i>	Please refer to Agent	West Suite, Coles Yard Barn, North Land, Clanfield, PO80RN
Email address:*	Please refer to Agent	[REDACTED]
Telephone number:	Please refer to Agent	[REDACTED]

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Neame Sutton on behalf of Donnington New Homes.
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	
Appendix:	
Policies Map:	
Other:	<i>Please refer to accompanying reps.</i>

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

Please refer to accompanying reps.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

Please refer to accompanying reps.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

Please refer to accompanying reps.

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying reps.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please refer to accompanying reps.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

Signature	Kimberley Parry	Date	02 March 2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

Town and Country Planning Act 1990 (As Amended)

West Berkshire Local Plan Review

Regulation 19 Consultation: Local Plan 2022-2039 Proposed Submission

Representations on Behalf of: *Donnington New Homes*

March 2023



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Appendices

Appendix A	Representations to the West Berkshire Local Plan Review Consultation (Regulation 19) Matters relating to Housing Needs and Supply (Pegasus Group, January 2023)
Appendix B	Illustrative Masterplan
Appendix C	Site Submission to the Hungerford Neighbourhood Plan

1. Introduction

- 1.1 Neame Sutton is instructed by Donnington New Homes to prepare representations to the Regulation 19 consultation of the West Berkshire Local Plan Review 2022-2039 Proposed Submission Plan (herein referred to as the Submission Plan).
- 1.2 Where appropriate, and in accordance with the requirements of the Regulation 19 consultation process, the representations identify the relevant policies and supporting text, and address the following topic areas:
 - Section 2 Strategic Objective No.2 (Housing) and Housing requirement
 - Section 3 The Spatial Strategy
 - Section 4 Draft Policies
 - Section 5 Site specific representations
 - Section 6 Summary and conclusion

2. Strategic Objective No.2 (Housing) and Housing Requirement

- 2.1 The strategic objectives and housing requirement set out in the Submission Plan are addressed in the Representations to the West Berkshire Local Plan Review Consultation (Regulation 19) Matters Relating to Housing Needs and Supply, prepared by Pegasus Group (January 2023) (Appendix A) and are not, as a result, repeated here.
- 2.2 The analysis by Pegasus Group highlights the shortcomings of the Submission Plan with reference to housing provision:
 - An insufficient buffer to allow for flexibility and to ensure that the local housing need (LHN) is met in full over the Plan period.
 - A larger buffer could be provided with no additional negative affects against the Sustainability Appraisal objectives and would provide additional positive benefits.
 - The current unmet need of Reading is not adequately provided for.
 - The likely future unmet need of Reading should be planned for now, and the Submission Plan should include flexibility to provide for that need as part of the Duty to Co-operate.
 - There is a clear case for an uplift to the housing provision to account for the identified affordable housing need of the area.
 - The reliance on a single, large strategic site for the delivery of most of the residual housing requirement, emphasises the need for a sufficient buffer to offset the potential under-delivery of the Plan.
 - A potential shortfall in the five-year housing land supply from the intended date of adoption of the Plan.
- 2.3 It is clear, as a result, that there is an urgent need for more housing in West Berkshire and, therefore, a need to increase the housing requirement within the Submission Plan.
- 2.4 Should the Council not take this opportunity to address the urgent need for more housing, it is likely that the Submission Plan will fail to meet the necessary test of soundness in terms of providing an effective and justified housing delivery strategy, which meets the needs of the community over the Plan period.

2.5 Of fundamental importance is the issue of unmet need from Reading. The failure of the Council to address the unmet need arising from Reading, now and in the future, puts the Submission Plan at risk of failing the necessary Legal Compliance test. A failure in terms of Legal Compliance cannot be addressed retrospectively through modifications in the same way that a matter of soundness can. If the Submission Plan fails the Legal Compliance test, the examination cannot continue, and the plan making process must recommence.

2.6 The unmet need arising from Reading must, therefore, be fully addressed now.

3. The Spatial Strategy

3.1 Policy SP1 (Spatial Strategy) states that the overarching spatial strategy for West Berkshire will deliver the spatial vision and strategic objectives for the district over the Plan period. The strategy:

- Directs development to areas of lower environmental value.
- Optimises the use of previously developed land.
- Optimises the density of development.

3.2 The development approach will be focused on three spatial areas:

- Newbury and Thatcham
- Eastern Area
- North Wessex Downs AONB

3.3 Given the clear need to increase the housing requirement, the Council's strategy fails to take advantage of the opportunity presented by Rural Service Centres, such as Hungerford, which are, by definition, larger rural settlements that are capable of accommodating growth, providing the opportunity to deliver sites early on in the Plan period.

3.4 Hungerford benefits from a good range of key services and opportunities for employment, community, and education. It is accessible and has regular public transport services to a range of destinations.

3.5 Directing further housing to locations, such as Hungerford, would enable the Submission Plan to cater for the needs of the community and assist in insulating the Council against housing delivery problems arising from the chosen strategy of focusing on a single large-scale development location.

4. Draft Policies

4.1 **SP1 Spatial Strategy** – Donnington New Homes considers that this policy should be revised to account for the opportunities presented for housing delivery in the Rural Service Centres, particularly Hungerford.

4.2 **SP3 Settlement Hierarchy** – Donnington New Homes agrees with the Settlement Hierarchy, where Hungerford is identified as a Rural Service Centre. The Council has allocated 55 homes to Hungerford, recognising its locational sustainability.

4.3 **SP15 Site Allocated for Residential Development in the North Wessex Downs AONB** – Donnington New Homes considers that this policy should be revised to account for the opportunities to release land to enable delivery of housing in the early years of the Plan, particularly within the sustainable settlement of Hungerford.

5. Site Specific Representations – Land at Smitham Bridge Road & Marsh Lane

- 5.1 This section addresses the promotion of the site at land at Smitham Bridge Road (housing) and Marsh Lane (allotments). The site has been promoted through the emerging Hungerford Neighbourhood Plan (HUN7 & HUN9) (Appendix C).
- 5.2 The masterplan (Appendix B) has been informed by Donnington New Homes' technical team and proposes housing on land at Smitham Bridge Road and allotments at Marsh Lane. The proposed density is reflective of the local area and would provide approximately 34 homes, including affordable housing, making a valuable contribution to the housing requirement, in a sustainable location.
- 5.3 There are no environmental constraints on the site and its development would allow the early delivery of housing in the Plan Period.
- 5.4 Whilst Donnington New Homes recognises that the allocation of sites in Hungerford is to be addressed through the emerging Neighbourhood Plan, the purpose of this section is to illustrate that in increasing the housing provision across the District, there are suitable, available and achievable sites (not already allocated) that could deliver housing in the early years of the Plan period, in a sustainable manner and in accordance with the spatial strategy.

6. Summary and Conclusion

- 6.1 In conclusion, the primary amendments necessary for the Submission Plan to be found sound and to meet the Legal Compliance test are summarised as:
 - An increase in the housing requirement to fully account for the local housing need across West Berkshire.
 - Inclusion of a buffer to the housing requirement to insulate against non-delivery during the Plan period.
 - Reconsider the Spatial Strategy to direct more housing to settlements, such as Hungerford, to ensure a better distribution of development, more reflective of the needs of the community.
 - Fully addressing the unmet need arising from Reading to ensure the Legal Compliance test is met.
 - The allocation of further sites to enable a rolling five-year housing land supply, maintained over the Plan Period, of which Donnington New Homes' promotion site at Smitham Bridge Road for approximately 34 new homes and Marsh Lane for allotments, is a prime example of the suitable, available, and achievable sites that can come forward.

**Representations to the West Berkshire Local Plan Review
Consultation (Regulation 19)**

Matters relating to Housing Needs and Supply

On behalf of Donnington Land and Property Limited

Date: 19 January 2023

Pegasus Ref: P20-2795

Author: Philip Smith



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	17/01/23	PS	NT	
V2	26/01/23	PS		Client comments
V3	27/01/23			
V4	22/02/23	RH		Accepting tracked changes and finalise



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1. Introduction

- 1.1. These representations to the West Berkshire Local Plan Review Proposed Submission consultation draft (Regulation 19) have been prepared by Pegasus Group on behalf of Donnington Land and Property Limited in the context of their interests in West Berkshire.
- 1.2. These representations concern the policies and related text and evidence relating to the housing requirement and delivery in the draft West Berkshire Local Plan (dWBLP).

2. Housing Requirement

- 2.1. Paragraph 20(a) of the NPPF states strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for, inter alia, housing (including affordable housing).
- 2.2. On 22 December 2022 the Department for Levelling Up, Housing and Communities published for consultation proposed amendments to the NPPF. The transitional arrangements in the proposed revised Annex to the NPPF make it clear that the dWBLP will be assessed against the test of soundness as outlined in paragraph 35 of the NPPF published in July 2021. In other matters, until the proposed revisions to the NPPF are made, the dWBLP should proceed on the basis of existing national policy and guidance.
- 2.3. Strategic Objective 2 of the Proposed Submission Plan is: –:
“To provide a range of sites to ensure that the District's housing needs and aspirations are met by providing a range of market, affordable and specialist housing types, tenures and sizes in appropriate and sustainable locations.”
- 2.4. Policy S12 of the dWBLP sets out the minimum housing requirement for the Council as 513 dwellings per annum (dpa) for the for the period 1 April 2022 to 31 March 2039; resulting in a total requirement of 8,721 dwellings.
- 2.5. The figure of 513 dpa is calculated using the Government’s Standard Methodology (SM) as set out in the NPPF and the accompanying Planning Practice Guidance. The figure of 513 dpa corresponds with that calculated by Pegasus Group in accordance with the SM and latest available data.

2.6. The Planning Practice Guidance (PPG)¹ explains that the SM should be considered as a starting point and that the level of need should be informed by local conditions:

"The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates."

2.7. It goes onto outline circumstances where this may be appropriate:

... include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- **growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);**
- **strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or**
- **an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;**

2.8. The West Berkshire Housing Needs Assessment Update (WBHNAU) prepared by Icen Projects Limited on behalf of West Berkshire Council in July 2022 concluded that there are at present no reasons to increase housing supply above that calculated using the Standard Method.

3. Housing Requirement Buffer

3.1. Policy S12 of the dWBLP expresses the housing requirement as a range, with an additional 5% above the LHN (rounded to 538 per annum) made to be in accordance with the government's objective of significantly boosting the supply of homes as set out in the NPPF.

3.2. Paragraph 6.10 of the dWBLP states that:

"The allocation of sites in the LPR aims to meet delivery of a higher number of homes in order to both boost supply and have some built-in flexibility. The upper end of the

¹ Paragraph: 010 Reference ID: 2a-010-20190220



range is a target but should not be considered a maximum amount. It is not intended to be a cap on development that would otherwise be acceptable.”

- 3.3. The inclusion of such a buffer helps to ensure that the LHN as a minimum is delivered within the Plan period.. The inclusion of a buffer is supported in principle by Donnington Land and Property Limited, however, concern is raised as to the extent of the buffer planned for in the dWBLP.
- 3.4. Although there is no national guidance regarding the extent of any buffer, it is common practice in local plans to have at least a 10% buffer to ensure the minimum housing requirement is met should the sources identified in the Plan not come forward as expected.
- 3.5. The approach to housing delivery was assessed through the Sustainability Appraisal (SA) as part of the Plan making process and published alongside the dWBLP. As well as ensuring the Plan meets the NPPF’s objective of boosting the supply of housing, the SA recognises the need for some flexibility above the LHN figure to take account any changes to the LHN, and allow for phasing issues and an element of non-delivery of sites.
- 3.6. Two reasonable alternatives were considered in the SA, namely meeting the Local Housing Need (LHN) figure and LHN plus a buffer. The two reasonable alternatives were then subject to SA/SEA.
- 3.7. The Regulation 18 consultation considered a buffer of 10% to help to boost supply and provide flexibility, however, in response to the comments made as part of the Regulation 18 consultation a buffer of 5% was also considered for the production of the Regulation 19 dWBLP. This lower buffer was considered on the basis that “it would also provide a degree of flexibility helping to provide flexibility and a boost to the supply, while taking into account the constraints seen across the district”. These two options, along with the baseline LHN were then subject to SA/SEA.
- 3.8. All three options were assessed as having an overall positive effect against the SA objectives, however the LHN+10% buffer was assessed as having ‘an overall positive effect with some significantly positive effects’. In particular, the LHN+10% buffer option would significantly help to support the economy.
- 3.9. The SA concluded that all three options would have a negative effect on two of the SA objectives: –
 - 5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced, and

- 6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire

3.10. However, in relation to the above objectives it was noted that with mitigation the impact should be neutral for all three options.

3.11. It is therefore surprising that Council progressed on the basis of the lower buffer option of +5% for determining the housing requirement when there were no additional negative effects from the option of using the LHN+10% buffer, and indeed the higher figure would provide some additional significant positive benefits.

4. Unmet Needs of Reading

4.1. Paragraph 11b of the NPPF specifies that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

4.2. The Reading Local Plan was adopted in November 2019 and includes a housing need of 16,077 homes (699 pa) for the period 2013–36, of which 230 (unmet need) are to be provided elsewhere in the Housing Market Area.

4.3. The Duty to Co-operate was introduced by section 33A of the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011. It places a legal duty on local planning authorities, county councils and prescribed public bodies to work together on strategic cross boundary matters. The Localism Act states that the 'duty' requires that engagement should occur constructively, actively and on an ongoing basis during the plan making process and that regard must be given to the activities of other authorities where these are relevant to the local planning authority in question.

4.4. Two of the four tests of soundness of local plans (NPPF Paragraph 35) directly relate to the Duty to Co-operate: –

Plans must be:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.



Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

- 4.5. Planning Practice Guidance (PPG) at Section 61, paragraphs 09–28, includes specific guidance on the production, scope, and content of Statements of Common Ground.
- 4.6. West Berkshire Council published a Duty to Co-operative Statement in January 2023. It refers to and includes a Statement of Common Ground (WBCSoCG) published in August 2021, and signed by representatives of Bracknell Forest, Reading, West Berkshire and Wokingham Councils.
- 4.7. The WBCSoCG refers to A Memorandum of Understanding that was originally signed by the four West of Berkshire authorities in October 2017. This recognised the level of unmet need and agreed that the West of Berkshire area should meet its housing needs in full. This was replaced by a revised Memorandum of Understanding signed in August 2021.
- 4.8. The Western Berkshire authorities have agreed through the Memorandum of Understanding that Reading’s existing unmet need of 230 dwellings (based on the current development plan) is a collective responsibility and will be met within the HMA through flexibility included in emerging plans. It goes onto say that no authority is required to increase the minimum housing requirement or identify specific sites.
- 4.9. However, this agreement relates only to Reading’s need as calculated by the SHMA, not by any alternative calculations of need, which will need to be subject to separate discussions.
- 4.10. The Memorandum of Understanding states the identified 230 dwellings unmet need is likely to affect the planned level of housing provision in the latter part of the plan period, from 2026 to 2036, and will not therefore need to be accommodated in the short term.
- 4.11. There is no specific identification of site(s) to meet the identified 230 dwellings of the unmet need of Reading, nor inclusion within the housing requirement of any adjacent authority. Policy SP12 of the dWBLP therefore does not include any provision for meeting the unmet needs of Reading.
- 4.12. Paragraph 6.7 of the dWBLP addresses the needs of Reading as calculated using the SM:

“Reading has identified that a five yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard



methodology. Though the principle of meeting any unmet need within the Western Berkshire Housing Market Area (HMA) is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan-making process, before the need arises”.

- 4.13. A review of the Reading Local Plan should take place by November 2024. The Reading Local Development Scheme (LDS) has not been updated from that published in November 2016 and there is no indication of a timetable to review the Local Plan. Given the lack of progress since the adoption of the Reading Local Plan in 2019 the prospect of a new Plan being adopted by November 2024 is extremely unlikely.
- 4.14. Furthermore, housing delivery within Reading has fallen below the expected amount. Between 2013 and 2022 a total of 5,853 dwellings were completed in Reading Borough as compared to the annualised total of 6,201 representing a shortfall of 348 homes.
- 4.15. Reading is identified as a 35% uplift urban local authority in the 2020 revised Standard Methodology for Housing Need. The current figure for Reading based on the Standard Methodology is 907 dpa; an increase of 32% on the adopted Local Plan figure. If this is applied to the remainder of the Plan period 2022 to 2036, the need increases by 3,052 above the Adopted Plan figure.
- 4.16. The approach of the Western Berkshire authorities is to challenge the extent of the housing needs of Reading and to delay any resolution to meeting that need for as long as possible.
- 4.17. As an unmet need was identified in the 2036 Reading Local Plan, it is highly likely that a continued unmet need will be identified for the subsequent Review of the Reading Local Plan, particularly given the higher local housing need figure outlined above. Once established in the Revised Reading Local Plan, the adjacent authorities will need to accommodate this need in their own local plan reviews. In the case of West Berkshire this will not be until 2028 at the earliest and more realistically 2030 at best. In total therefore a period of 8 years will have elapsed since the housing need was established before it is effectively met. The total shortfall would be 1,557 homes over that period.
- 4.18. The West of Berkshire Authorities should be planning now to meet the future unmet needs of Reading Borough, including a realistic assessment of the proportion that can be met within West Berkshire, rather than deferring this contrary to the requirements of paragraph 35c of

the NPPF. The dWBLP should be flexible enough to accommodate, at least in part, some of that unmet need.

5. Affordable Housing Needs

5.1. Planning Practice Guidance paragraph 2a-024 states:

“... An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”

5.2. The West Berkshire Housing Needs Assessment Update (WBHNAU) shows a net annual need for 330 rented affordable homes and a net annual need for 367 affordable home ownership homes in the District. Therefore, the total affordable housing need of 697 homes per annum is in excess (130%) of the total housing provision proposed in the dWBLP.

5.3. Despite the level of need being high, the WBHNAU considers that this would not necessarily point to any requirement for the Council to increase the Local Plan Review housing requirement above that suggested by the SM.

“The link between affordable need and overall need (of all tenures) is complex and in trying to make a link it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home)”.

5.4. The WBHNAU considers that the affordable housing need arising from newly forming households is already accounted for in the output from the demographic modelling (i.e. the Standard Method), and are therefore already included in the overall housing need figures.

5.5. Whilst it is accepted that the relationship between affordable housing need and overall housing need is complex and that there is no simple arithmetical means of linking the two, the PPG is clear that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. Furthermore paragraph 20 of the NPPF is clear that strategic policies should make sufficient provision for affordable housing.

5.6. The WBHNAU erroneously conflates the overall housing needs of the area with that of the need for affordable housing. Whilst it is true that a proportion of households in need of affordable housing are already accounted for in the demographic modelling of the SM and therefore it is not necessary to deliver more homes than suggested by the SM, this misses the fact that the WBHNAU identifies that there is a greater need for affordable homes than

there are for all homes according to the standard method. Accordingly, even if all of the homes proposed were delivered as affordable homes there would still be a shortfall. It also misses the fact that a proportion of the housing delivered will not be affordable homes and so will not respond to the needs identified and that accordingly, it will be necessary to provide for an even greater number of homes to meet the need for affordable housing as set out in the Planning Practice Guidance.,

- 5.7. Donnington Land and Property Limited acknowledge that the Council may not be able to meet the affordable housing needs in full, however the disparity between what is needed and what is planned to be delivered indicates a clear need for an uplift in the overall housing requirement to ensure a sufficient provision of affordable housing in accordance with paragraph 20 of the NPPF.
- 5.8. The Council acknowledges the upper target of the housing provision does not constitute a ceiling or cap to development (draft Policy SP12). An uplift in the housing provision for affordable housing needs would therefore not be at odds with the development strategy of the Council.

6. Housing Delivery

- 6.1. The Council identify an existing supply of 7,337 dwellings across the Plan period, including a windfall allowance of 1,949 dwellings. To meet the target of 538 new dwellings per annum over the plan period, sites for a further 1,809 dwellings need to be found (requirement of 9,146 minus 7,337).
- 6.2. The dWBLP allocates 1,720 dwellings on 9 sites to meet the residual requirement, of which 1,500 (87%)² are to be delivered on a single site, North East Thatcham (SP17).
- 6.3. According to the trajectory published in the Housing Background Paper January 2023 completions at North East Thatcham will commence in 2028/29 at a rate of 150 dwellings per annum (dpa). Such a trajectory is higher than that demonstrated in the Lichfields' Start to Finish Report (2nd ed.) which shows a median build out rate of 104 dpa and a mean of 120 dpa

² 16% of the total requirement



for sites between 1,500 and 1,999 units. Using the higher of the two would result in a delivery of 300 units less than shown in the dWBLP trajectory.

- 6.4. The Council may argue that the proposed 5% buffer allows for a slower delivery of North East Thatcham, however it would leave only a small buffer for non-delivery and delay on other sites and/or windfalls not delivering at the expected rate. It would therefore be prudent to increase the delivery buffer to at least 10% to take account of such a scenario.
- 6.5. For the Plan to be effective and meet national policy and guidance³ the Council should be able to demonstrate a five year housing supply at the intended point of adoption.
- 6.6. The Council in their Five Year Housing Land Supply Statement published in November 2022 claim a 6.4 year supply against the LHN figure of 513 dpa for the 5 year period commencing at April 2022. It should be noted that none of the proposed new allocations in the dWBLP are forecast by the Council to commence before April 2027.
- 6.7. However, as the Plan is unlikely to be adopted before April 2024 it is necessary to assess the likely five year housing land supply at that point.
- 6.8. The housing trajectory presented in the Housing Background Paper shows there will be a nominal shortfall of 434 dwellings against the housing requirement of 538 + 5% buffer⁴ for the period 2024 to 2029 before any oversupply in the first two years⁵ of the Plan period are taken into account, resulting in a 4.23 year supply. Should the oversupply be accounted for across the remaining plan period⁶ the shortfall would reduce to 61 and result in a 4.89 year supply. However, if the shortfall is accounted for in the first five years of the plan following its adoption⁷ there would be a surplus of 684 dwellings and a 5 year supply of 6.21 years.
- 6.9. Whilst it currently falls to a matter of planning judgement as to which of these three approaches should be used, it is clearly open to a decision-taker to conclude that at the point of adoption the Council will be unable to demonstrate a five-year land supply.

³ Paragraph: 004 Reference ID: 68-004-20190722

⁴ As per paragraph 74 of the NPPF

⁵ 'Oversupply' 2020-22 = 1,177

⁶ The inverse 'Liverpool' method

⁷ The inverse 'Sedgefield' method

Therefore, additional sites capable of delivering early in the plan period would ensure that a five year land supply will be able to be demonstrated on any basis.

7. Conclusions

7.1. The above analysis highlights shortcomings in respect of housing provision in the dWBLP as follows:-

- a) an insufficient buffer to allow for flexibility and ensure the LHN is met in full over the Plan period,
- b) a higher housing requirement by increasing the buffer can be made with no additional negative affects against the Sustainability Appraisal objectives, and indeed would provide additional positive benefits,
- c) the current unmet needs of Reading are not adequately provided for,
- d) the likely future unmet needs of Reading should be planned for now, and the dWBLP should include flexibility to allow for the provision of that need as part of the Duty to Co-operate,
- e) there is a clear case for an uplift to the housing provision to account for the identified affordable housing needs of the area,
- f) the reliance on a single large strategic site for the delivery of most of the residual housing requirement, further emphasizing the need for a sufficient buffer for potential under-delivery of the Plan, and
- g) a potential shortfall in the five year housing land supply from the intended date of adoption of the plan if the oversupply is not accounted for in the five years following adoption

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Cirencester

Pegasus House, Querns Business Centre,
Whitworth Road, Cirencester, GL7 1RT
T 01285 641717
E Cirencester@pegasusgroup.co.uk
Offices throughout the UK.

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HUN9:
Proposed Permanent
Allotments

HUN7:
Proposed Housing and
Open Space Allocation

LAND WEST OF HUNGERFORD – CONCEPT PLAN

05 December 2022

BY EMAIL ONLY

FAO: Claire Barnes – Town Clerk
Hungerford Town Council
Church Street
Hungerford
Berkshire
RG17 0JG

Dear Claire

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
RESIDENTIAL LAND PROMOTION – DONNINGTON NEW HOMES LIMITED
HUNGERFORD NEIGHBOURHOOD PLAN – SITES HUN7 & HUN9
LAND AT SMITHAM BRIDGE ROAD & MARSH LANE, HUNGERFORD, BERKSHIRE

I refer to the above site and the Town Council's current Second Call for Sites that runs until 30 December 2022.

I write to provide the Town Council with an updated position in respect of our Client (Donnington New Homes Limited) joint promotion site (Sites HUN 7 & HUN 9). This update note also incorporates previous commentary provided to the Town Council in relation to various matters so that the Town Council has all of the necessary information in respect of Donnington's promotion site in order to take a fully informed decision on its allocation for housing and allotments.

Masterplanning:

Pegasus Planning has prepared an updated masterplan that moves the original concept plan forward and is based on an indicative housing mix to give you a clearer indication of how the site could be developed in a manner that ensures all Development Management requirements set out by West Berkshire Council and yourselves through the emerging Neighbourhood Plan could be achieved.

The masterplan also annotates a potential gateway feature on the existing highway adjacent to the proposed site access, off North Standen Road. The detailed design and location of this feature will be the subject of further discussion with the Highway Authority as part of any future planning application. The annotation is intended to provide an example of where such a feature could be sited and to confirm Donnington's intention to deliver the feature as part of the development of this site in the future.

In addition Pegasus has prepared an illustrative perspective image of how the development of the site may look when completed. The view is taken from the public right of way that runs along the eastern side of the site.

The masterplan covering both HUN7 and HUN9 and illustrative perspective image is attached to this letter.

Landscape Appraisal:

To assist in your consideration of the suitability of the site Pegasus Landscape team has undertaken a landscape appraisal of the site and its surrounding context. The key findings from the landscape appraisal have informed the updated masterplan for the site. In particular the scale of the proposed housing on the site has been kept below the canopy tree line of the existing trees that are located along the southern and western boundaries of the site.

The Landscape Appraisal Report is attached to this letter.

Sustainable Energy:

Briary Energy has prepared an Energy Strategy Review that examines the opportunities for the use of renewable energy sources across the site along with exploring the potential for a centralised or district heating system.

The attached Energy Strategy Review report confirms how renewable sources can be incorporated across the site, including photo voltaics, as part of a future planning application proposal. It is relevant to note that photo voltaics can either be applied to every dwelling or as part of a range of options employed across the site. The exact detail of any renewable energy scheme will be worked up as part of a future planning application. The attached report does however confirm that the site is ideally placed to utilise low carbon technologies and Donnington is committed to delivering these measures as part of the future development of the site.

Public Right of Way Upgrade:

Legal advice has been taken from Penningtons Manches Cooper LLP solicitors on the matter of upgrading the surface of the public right of way offsite. They have confirmed that under the provisions of the Highways Act 1980 (As Amended) the Town Council has the right to resurface a public right of way on third party land.

Providing the resurfacing works are undertaken by the Town Council there is no legal impediment to the offsite section of the Public Right of Way between the Promotion Site and Smitham Bridge Road being upgraded. Donnington is content to cover the cost and management of the offsite upgrade to the

Public Right of Way as part of the delivery of the site for housing. This can be secured in due course via a Planning Obligation (S106 Agreement).

Overhead Electricity Cables:

I can confirm that the intention is for the overhead electricity cables to be rerouted underground as part of the development of the site.

Delivery of Tenure Security for Existing Marsh Lane Allotments:

Having given further detailed consideration to the current tenure position of the allotment holders at Marsh Lane Donnington has held discussions with the landowner who has agreed to provide tenure security for the existing allotments (Site HUN9) alongside the delivery of a housing allocation on land at Smitham Bridge Road (Site HUN7).

The tenure security will take the form of a freehold interest in Site HUN9 being passed to the Town Council who would then be able to operate the allotments.

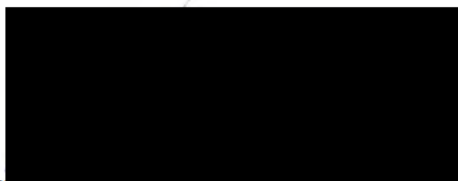
This is considered to represent a significant benefit to the local community and one that is unique to Site HUN7.

I trust the above updates and the attached documents are of assistance in your ongoing consideration of this site as a potential housing allocation.

If you have any queries please do not hesitate to contact me.

Kind regards.

Yours sincerely



DAVID
DIRECTOR



cc. Philip Simmons – Donnington New Homes Limited

Encs.

The identification of sites does not imply that Hungerford 2036 considers that the site is suitable for development, either now or in the future. It cannot be taken as representing either an intention to allocate these sites, or as a material consideration in the determination of a planning application. The allocation of future sites for development will only take place through statutory plan processes which undergo several stages of public consultation and independent examination.

Before completing this form, please read the following guidance notes:

- Sites may be included in future public consultation exercises, so cannot be treated confidentially.
- Please complete the form in as much detail as possible. Please attach an Ordnance Survey map clearly showing the precise boundaries of the site and the part that is regarded as suitable for development (if that is not the whole area). This will assist in the assessment of the site. You are also welcome to attach any relevant additional information (eg. tree survey).
- Please complete a separate form for each site.
- Do not submit sites that already have planning permission for development unless a new and different proposal is likely in the future.
- Only submit sites that you have an interest in and that you believe have genuine potential to be developed over the period to 2036.
- Only sites that are 0.15 hectares (approximately 0.4 acres) or greater in size should be submitted.
- You do not need to complete this form if you are simply proposing minor changes to existing premises (e.g. extensions or renovations).
- In completing this form, you are giving permission for a representative of the Hungerford 2036 team to access the site with or without prior notice in order to assess its suitability.
- The Call for Sites request is separate from the Local Authority's planning application process.

Where do I send the completed forms?

Please return all completed forms to the Hungerford 2036 Team either:

- By e-mail to [REDACTED]
- In hard copy to Hungerford Town Council office, The Library, Church St, Hungerford, RG17 0JG

Personal information given on this form will be used for the purpose of correspondence only.

Address of Site <i>(Please include a plan with the boundaries of the site marked in red)</i>
Land at Smitham Bridge Road and Marsh Lane, Hungerford, Berkshire

Contact details	
Name	David Neame - Director
Organisation <i>(if relevant)</i>	Neame Sutton Limited o/b Donnington New Homes Limited
Address	West Suite, Coles Yard Barn, North Lane, Clanfield, Hampshire, PO80RN
Telephone	██████████
Email	████████████████████

Your Details				
You are..? <i>(Please tick all that apply)</i>	A Private Landowner	<input type="checkbox"/>	A Planning Consultant	<input checked="" type="checkbox"/>
	A Public Land-owning Body	<input type="checkbox"/>	A Land Agent	<input type="checkbox"/>
	A Registered Social Landlord	<input type="checkbox"/>	A Developer	<input checked="" type="checkbox"/>
	Other <i>(please specify)</i>			
If you are representing a client(s), please supply the name(s) and address(es) of those you represent	Neame Sutton Limited o/b Donnington New Homes Limited			

Ownership Details	
Are you the current owner of the site?	No.
If YES, are you...	Sole owner <input type="checkbox"/> Part owner <input type="checkbox"/>
If you are not the owner, or the site is in multiple ownership, please provide the name(s), address(es) and contact details of all owners. <i>(Please continue on a separate sheet if necessary, and provide a plan showing extent of individual land holdings)</i>	Donnington New Homes Limited has an Option on the land Land Owner - F Clothier Esq 6 Pinetrum Close, Devizes, Wiltshire, SN10 5EW

Has the landowner (or each owner) indicated support for development of the land?	Yes
--	-----

Site Location		
Site name (is the site known by a particular name?)		
Site address	Land at Smitham Bridge Road and Marsh Lane, Hungerford, Berkshire	
Site OS grid reference	Northing:	Easting:

Proposed Development / Land Use (please give details)					
<p>In the 1st column, please tick proposed type of development / land use.</p> <p>In the 2nd column, please tick any land uses you would also consider appropriate.</p> <p>In the details column, please specify the type of use and indicate the proposed mix of uses and number of units, plots, pitches, amount of floorspace etc.</p>	Development / Land Use	1st	2nd	Details	
	<input type="checkbox"/>	Residential			HUN7 for residential development of circa 34 dwellings
	<input type="checkbox"/>	Affordable Housing			
	<input type="checkbox"/>	Specialist Residential (inc. boarding schools)			
	<input type="checkbox"/>	Gypsies & Travellers			
	<input type="checkbox"/>	Travelling Showpeople			
	<input type="checkbox"/>	Employment (inc offices, manufacturing, industry, storage and distribution)			
	<input type="checkbox"/>	Retail (inc. shops, cafés, bars, restaurants etc.)			
	<input type="checkbox"/>	Tourism (inc. hotels, boarding and guest houses)			
	<input type="checkbox"/>	Leisure / Recreation			
	<input type="checkbox"/>	Community Facility			
<input type="checkbox"/>	Renewable Energy				

	Other (please specify)			HUN9 - Proposed permanent allotments

Site Details		
Site area (<i>hectares</i>)	Whole site	Area Suitable for development
Current or previous land use(s)	Primary land-use	Residential (HUN7) & Allotments (HUN9)
	Secondary land-use	
Existing structures (<i>e.g. detached dwelling</i>)	N/A	
Would development require relocation of the current use or demolition of existing structures?	No.	
Adjacent land-uses (<i>e.g. 2-storey terraced housing / open farmland</i>)	To the north	See attached covering letter
	To the east	
	To the south	
	To the west	
Relevant planning history		

Site Constraints: Are there any limitations that may prevent or constrain development on this site? (<i>please give details</i>)	
Access Issues (<i>e.g. is there immediate access to an adopted highway, is access required over land not controlled by the owner</i>)	None - See attached covering letter
Topography or ground conditions (<i>eg. site slopes, varying site levels etc.</i>)	None - See attached covering letter
Contamination/ Pollution/ Hazardous Uses (<i>eg. unsuitable ground conditions, previous hazardous land uses, unstable/contaminated structures</i>)	None.
Flood risk (<i>liability of site to flooding</i>)	None.
Legal/ Operational Constraints (<i>eg. ownership constraints, covenants, tenancies, 'ransom strips' or operational requirements of landowners</i>)	None - See attached covering letter
Environmental Constraints (<i>eg. negative effects on local landscape wildlife designations,</i>	None - See attached covering letter

protected species, loss of mature woodland, loss of locally used open space or access to open space)	
Utilities and Infrastructure Provision (eg. provision of services to development including gas, electricity, water, sewerage and telecommunications)	None
Planning Policy Constraints (eg. based on adopted policy, designations or protected areas including Conservation Areas, Sites of Special Scientific Interest, Green Infrastructure)	Countryside and AONB
Other considerations (any other issues that may affect the developability of the site)	None - See attached covering letter

Can the constraints be overcome and are any of them likely to affect the achievability or timing of the development? Please give details
Yes - See attached covering letter and enclosures

Site Achievability (please give details)		
Is the site currently being marketed?	No	
Is the site owned by a developer?	No	
Is the site under option to a developer?	Yes	
Please tick the likely timescale for the site being developed	Available immediately	Within the next 11-15 years
	Within the next 1-5 years	X Years 15+
	Within the next 6-10 years	
Once work has commenced, how many years do you think it would take to complete?	18 months	

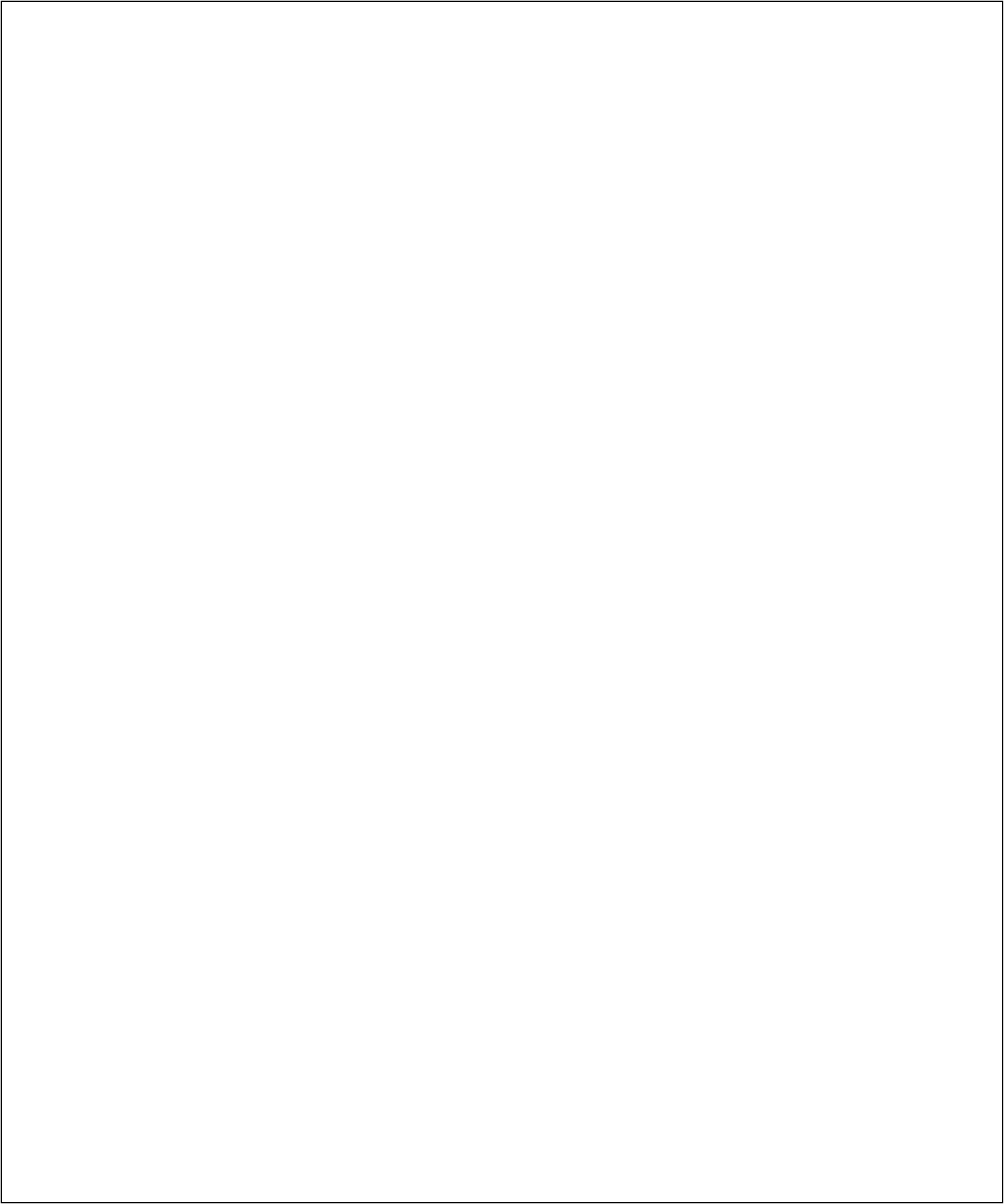
Access to Site - Site Assessment (please give details)

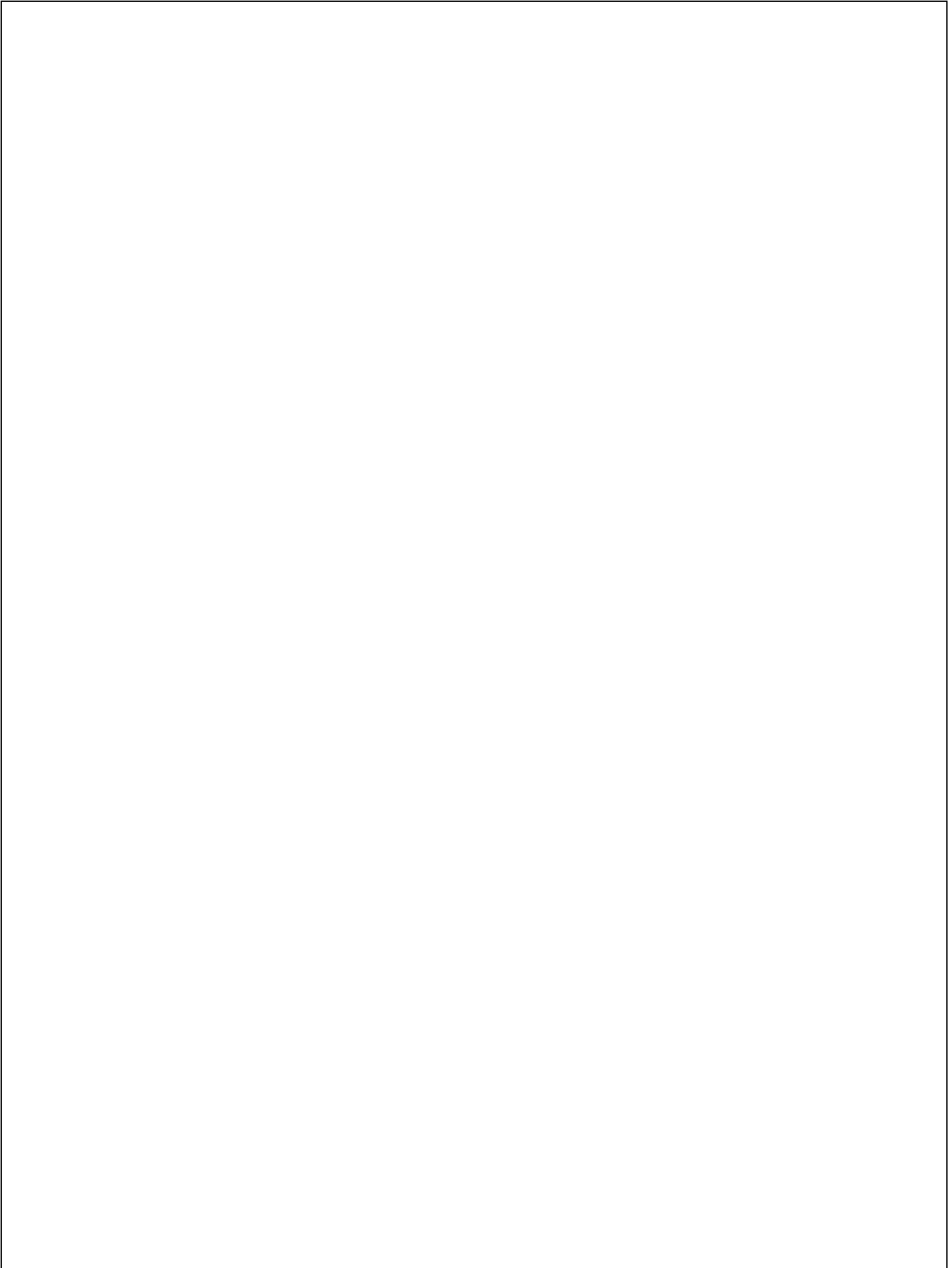
Are there any issues that would restrict access to the site by a representative of the Council undertaking further assessment?

None.

Please provide any additional information you think may be helpful in consideration of this site for development.

Please also use this section if you require more space to respond to any of the earlier questions.





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LAND WEST OF HUNGERFORD - 3D ILLUSTRATION

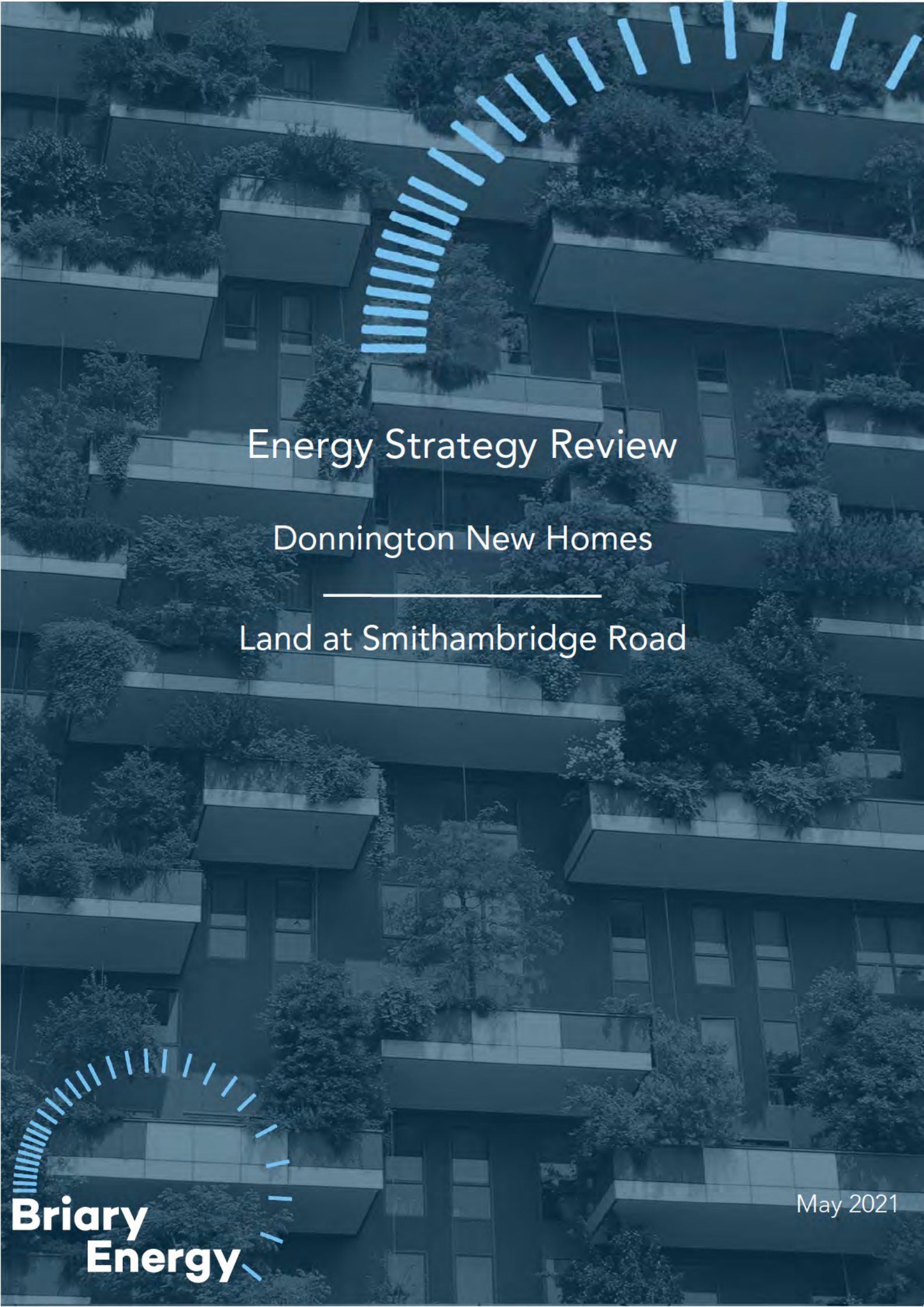


HUN9:
Proposed Permanent
Allotments

HUN7:
Proposed Housing and
Open Space Allocation



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Energy Strategy Review

Donnington New Homes

Land at Smithambridge Road

1. Executive Summary

Donnington New Homes has instructed Briary Energy to prepare this document, which examines the feasibility of suitable Low to Zero Carbon (LZC) sources, high-efficiency alternative systems, and low carbon energy efficiency measures in order to comply with local and national energy and carbon regulations and frameworks.

The Land at Smithambridge Road development will comprise of circa 39 dwellings. The developer will first ensure a Building Regulation compliant carbon reduction across all dwellings through fabric measures, before assessing LZC technologies where appropriate.

1.1. Local Policy

Policy CS15 of the existing West Berkshire Core Strategy requires carbon reduction relative to the now withdrawn Code for Sustainable Homes (CfSH) standards. As this is now withdrawn there are no specific reduction targets relating to this development.

The development will however seek to follow policies of the West Berkshire Local Plan Review to 2037 relating to energy and carbon emissions, specifically policies SP 5 and DC 3.

Policy SP 5 - Responding to Climate Change

The principles of climate change mitigation and adaptation will be embedded into new development, improving the resilience of land, buildings and existing and future communities to the opportunities and impacts arising from climate change. All development should contribute to West Berkshire becoming and staying carbon neutral by 2030. Depending on the nature and scale of proposals, development will be expected to satisfy all of the relevant following criteria:

- To withstand predictable effects from climate change for its expected lifetime;
- To take advantage of the latest low and zero carbon technologies and innovations, including digital;
- To achieve the highest viable levels of energy efficiency;
- To generate and supply renewable, low and zero carbon energy for its own use and/or local distribution networks in accordance with policy DC3;
- To provide for sustainable forms of vehicular and personal transport to and from the site and reduce car use in accordance with policies SP22, DC36 and DC37;
- To enable recycling and waste reduction both during construction and occupation;
- To manage and conserve adequate water resources and avoid harming water quality and improve it where possible in accordance with policies DC6 and DC7;
- To demonstrate that flood risk from all sources can be avoided or managed in accordance with policy SP6;
- To use sustainable urban drainage systems in accordance with policy SP6;
- To provide for green/blue infrastructure and open spaces within the layout for shading and cooling, to detain surface water run-off and absorb carbon dioxide emissions in accordance with policy SP10;
- To improve wildlife habitat and species conservation and connectivity to allow for movement in response to climate change in accordance with policy SP11; and
- To maintain the integrity of the historic environment and to respect the character and improve the environmental performance of heritage assets without compromising their significance, by adopting principles of reversibility and minimum intervention in accordance with policy SP9. Proposals should be accompanied by a Sustainability Statement which demonstrates how these principles have been embedded into the development. The level of information provided should be proportionate to the scale and nature of the development proposed.

Policy DC 3 Building Sustainable Homes and Businesses

1. Residential Development Proposals for residential development will meet the following minimum standards of construction:

For the avoidance of doubt, the base standards are Homes Quality Mark (HQM) 2018 and Building Research Establishment Environmental Assessment Method (BREEAM) 2018 (or equivalent).

Projects will be expected to aspire beyond these ratings where possible to do so, as determined by the submission of a pre-assessment estimator output at the initial planning submission stage. For building projects, both interim/design stage certificates will be expected to be submitted at appropriate stages as agreed between the Council and the applicant but with the final certification no later than 6 months post completion.

...

3. Renewable Energy

A. Where appropriate, all new development will incorporate a proportion of future energy use from renewable energy sources with:

- i. A minimum of 10% for proposals of 1 – 9 homes (gross) or under 100 sq.m (gross) commercial floor space; and
- ii. A minimum of 20% for proposals of 10 or more homes or over 100 sq.m commercial floor space.

1.2 Building Regulation Uplift

As part of the governments commitment to bring greenhouse gas emissions to net zero by 2050, significant uplifts have been announced to the part L building regulations, to provide a clear route map to developers towards the 'Future Homes Standard', ensuring that energy efficiency standards are set that put housing on track to meet the 2050 target.

The Land at Smithambridge Road development is expected to be constructed following the implementation of the first part L standards uplift, which will require a 31% carbon reduction compared to current building regulation requirements.

1.3 Development Energy Strategy

To meet the carbon reduction targets, the 'Energy Hierarchy' will continue to be applied, prioritising initial demand reduction through fabric efficiency. Within the new Part L building regulations, the 'notional' dwelling is to have its fabric specification improved, therefore the development will need to target U-Values better than those than that would meet current standards. This will ensure long lasting benefits of the dwelling, future proofing the development.

Following initial demand reduction, there are two realistic options for meeting a 31% carbon reduction as required, both of which will be considered at planning. As Air Source Heat Pumps are a renewable technology, this approach would also comply with emerging Policy DC 3.

Option 1 assumes that a gas supply will be brought to the development, and dwellings fitted with high efficiency boilers. Each dwelling will incorporate low and zero carbon energy technologies such as Waste Water Heat Recovery (WWHR) and Flue Gas Heat Recovery Systems (FGHRS) to address hot water demand, as well as Solar PV panels for energy generation. Based on the orientation of the site and the current masterplan layout, all plots would benefit from a suitably located PV array, with some plots hosting a larger PV array than others. It is anticipated that this strategy would ensure 20% of the development energy demand would be met through renewables, therefore complying with emerging policy DC 3.

Option 2 would not bring a gas supply for heating, each dwelling would instead meet heating and hot water demand through Air Source Heat Pumps (ASHP). This approach would not require additional technologies to meet the 31% carbon reduction, but along with the high fabric efficiency would create dwellings that are zero carbon ready, following continued decarbonisation of the national grid.

2. Energy hierarchy through design

The Land at Smithambridge Road development will be developed with the aim of reducing annual energy consumption, whilst providing energy in the most environmentally friendly way to reduce the annual CO₂ footprint.

This strategy has been developed using established methodology (as recommended by Cibse and the London Plan). It has three stages of priority, seeking to reduce energy use through the cleanest possible solutions.

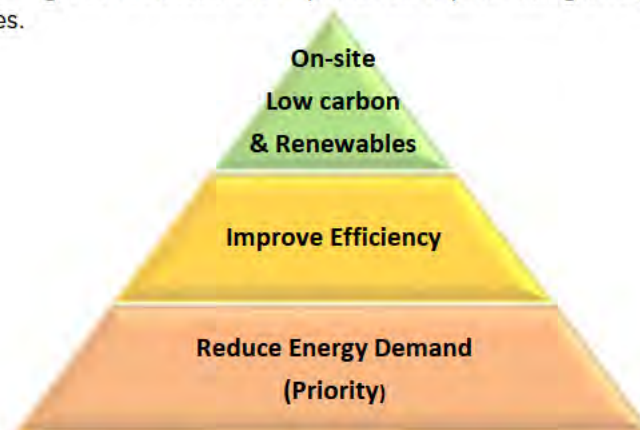
Be Lean - Reducing energy needs through improved design and construction.

Be Clean - Supply energy efficiently through the use of decentralised energy where feasible.

Be Green - Further reduce CO₂ emissions through the use of on-site renewable sources, where practical.

As this hierarchy demonstrates, designing out energy use is weighted more than the generation of low-carbon or renewable energy to offset unnecessary demand. Applied to the development of new housing, this approach is referred to as 'fabric first' and concentrates finance and efforts on improving U-values, reducing thermal bridging, improving airtightness and installing energy efficient ventilation and heating services.

This approach has been widely supported by industry and government for some time, with previous reports from Zero Carbon Hub [1] and Energy Saving Trust [2] having both stressed the importance of prioritising energy demand as a key factor in delivering resilient, low energy homes.



Further to the above methodology, we have also looked at other steps towards achieving a low carbon solution, including:

- The incorporation of passive design solutions by considering the dwellings orientation and layout solutions;
- The incorporation of energy efficiency measures through the design of services and improved fabric performance;
- Calculation of the predicted design energy consumption rates and associated annual CO₂ emissions in comparison with a 'baseline' building (using Part L Regulations compliance standards) to include both regulated and un-regulated energy use;
- Assessment of the viability of incorporating low and zero carbon energy sources.

Benefits of the Fabric First Approach	Fabric Energy Efficiency Measures	Build on renewable energy technologies
Energy/CO ₂ /fuel bill savings applied to all dwellings	✓	X
Savings built-in for life of dwelling	✓	X
Highly cost-effective	✓	X
Increases thermal comfort	✓	X
Potential to promote energy conservation	✓	✓
Minimal ongoing maintenance / replacement costs	✓	X
Minimal disruption to retrofit post occupation	✓	X

[1] Zero Carbon Hub, Zero Carbon Strategies for tomorrow's new homes, Feb 2013.

[2] Energy Saving Trust, Fabric first: Focus on fabric and services improvements to increase energy performance in new homes, 2010

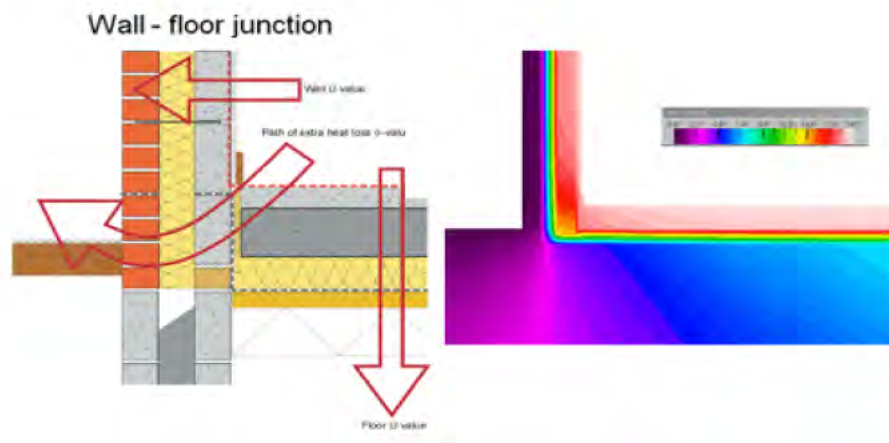
3. Be Lean - Energy efficient design measures

Enhancing the thermal performance of the building is usually more cost effective than providing renewable energy, with more reliable CO₂ savings for the long-term life cycle of the building, without the cost of replacing mechanical or electrical components on a continual basis. Adding renewable technology will then maximise these carbon reductions, reducing the quantity required.

The below table highlights a range of typical fabric U-Values that could be applied to ensure compliance with the uplifted fabric requirements. As the building regulation change is still under consultation, any predicted specifications will be subject to change.

Element	Building Regulations	Proposed
Ground Floor	0.25 W/m ² k	0.11 W/m ² k
External Wall	0.30 W/m ² k	0.21 W/m ² k
Insulation at Joists	0.20 W/m ² k	0.09 W/m ² k
Insulation at Rafters	0.20 W/m ² k	0.16 W/m ² k
Windows	2.00 W/m ² k	1.09 W/m ² k
Doors	2.00 W/m ² k	1.20 W/m ² k
Air Permeability	10.00 m ³ /hm ² (@50 Pa)	4.00 m ³ /hm ² (@50 Pa)
Thermal Bridges	0.15 ≤ Y	Calculated Constructive Details

Improving the thermal bridge constructive details can have a great impact on the heat loss of the development, in some cases using enhanced details can make as much as a 27% improvement on fabric alone.



Additional improvements to thermal performance can be achieved by ensuring good practice airtightness targets are achieved. Simple measures like sealing around services (e.g. water, gas and cables), using proprietary seals and collars, ensuring blockwork is sealed and parging layer/plaster finish is applied to external walls before erecting studwork for internal partitions will all improve air tightness results.

4. District Heating

As part of planning, any major development proposal should evaluate feasibility of energy systems in accordance with the following hierarchy: -

- Connection to existing heating and cooling networks;
- Site wide combined heat and power (CHP) network;
- Communal heating and cooling.

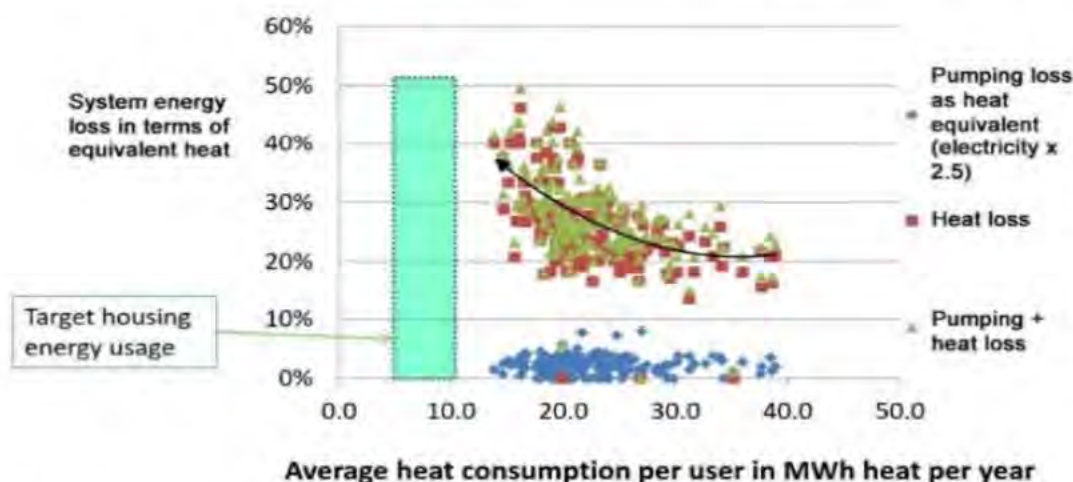
Over several years, building service engineers Max Fordham have studied the benefits and drawbacks of providing heat to buildings via hot water heat networks supplied from community scale heat sources, in particular combined heat and power (CHP). Government scenario planning includes predictions that by 2050 heat networks may supply about 20% of the UK's building heat demand [D. o. E. & C. Change, "National Energy Efficiency Data-Framework (NEED) report: Summary of analysis 2013 Part 1," DECC, 2013.]. It is clear that government policy is vigorously pursuing gas fired CHP with heat networks, but to what effect?

The issues are varied and complex, and include: consideration of the heat sources that may be in use in the future; the future strategy for national electricity generation; the difference between "as predicted" and "as measured"; the relationship to the intensity of heat demand; and the costs to the end users.

The most important aspect that Max Fordham concluded is that the heat network system heat losses are very large. They are much larger than the assumed values used in regulatory and system planning calculation methods (such as SAP).

An unfortunate feature of this (district heating) debate is that good quality data from a wide range of UK installations is not available or not publishable due to its commercially sensitive nature. Clearly this situation is not helping the UK develop a low carbon heat strategy.

However, data from the Danish District Heating Association shows that from analysis of about 100 installations the heat losses in the municipal distribution pipes ranged from 15% to 45% of the heat supplied. This is only the loss up to the building site boundaries. There will be additional losses inside the buildings too. The current UK average domestic heat demand is 14MWhr/dwelling/yr. [D. o. E. a. C. Change, "National Energy Efficiency Data-Framework (NEED) Summary consumption statistics," DECC, 2011.]. At this scale the Danish data shows that a heat loss of around 35%. If the heat demand from buildings is reduced to less than 10 MWh/yr. (which is desirable) then the heat losses might represent 50% of the heat supplied.



Danish data of heat and pumping losses in district heating systems. Source: Birger Lauersen, International chef / Manager International Affairs, Dansk Fjernvarme / Danish District Heating Association

District Heating - Continued

High system heat losses (and pumping demands) mean that in many cases, gas fired CHP with heat networks will not reduce, but increase carbon emissions. This is particularly true when compared to using individual gas boilers and electricity from the current national grid. It is clear that heat networks need to be reassessed (by the UK Government) taking into account the true extent of heat losses and/or the mitigation measures required to reduce them. If this is done, we may well see quite a change in national and local policies for heat networks, with or without CHP.

Our preference has always been a much more vigorous pursuit of heat demand reduction, principally by insulating and draught proofing existing buildings. From our observations of district heating systems we believe that the very high losses can be reduced with improved components, improved design and improved care during installation. However, it is highly unlikely that the system losses could be reduced to the levels that have informed current government policy anytime soon.

The development will not connect to any existing district heating system, nor will a new system be considered, for the following reasons:

- 39 Dwellings does not provide sufficient dwellings for any savings to be realised compared to a typical heating system, with predicted network losses.
- the site is mainly residential, with units dispersed over a large area. This will mean that a large distribution network would be required, and it is anticipated that distribution losses would be high.
- the carbon reduction and energy efficiency requirements can be achieved at a lower cost, and at a greater benefit to the homeowner the 'fabric first' approach is proposed.
- the site is too far away from existing District Heat networks.
- the home owners would be tied to the same supplier, removing choice.
- The statement on the previous page outlines why CHP and district heating systems are generally more expensive to run, consume more energy and issue more CO₂ than an equivalent "conventional" systems.

5. Conclusion

The proposed development at Land at Smithambridge Road will prioritise sustainability and energy reduction through renewables by building to the part L uplifted standards, requiring a 31% carbon reduction over current emission targets. Following the energy hierarchy in order to reduce initial energy demand, the required reduction will be achieved either through applying PV arrays to each dwelling, or by providing heating and hot water through Air Source Heat Pumps. Based on the dwelling orientations present on the masterplan layout, all dwellings would be able to benefit from a suitably located PV array, with some plots hosting a larger PV array than others to maximise generation potential.

This will secure long lasting benefits both to the end user and government net emission targets, while meeting renewable policy targets of the emerging West Berkshire Local Plan.

LANDSCAPE APPRAISAL FOR LAND SOUTH OF NORTH STANDEN ROAD, WEST HUNGERFORD

ON BEHALF OF DONNINGTON NEW HOMES

Prepared by: **Andrew Cook BA (Hons) MLD CMLI MIEMA CEnv**
Executive Director

Pegasus Group

Pegasus House | Querns Business Centre | Whitworth Road | Cirencester | Gloucestershire | GL7 1RT

T 01285 641717 | **F** 01285 642348 | **W** www.pegasuspg.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

1. INTRODUCTION

- 1.1 Donnington New Homes has instructed Pegasus to undertake a landscape appraisal with respect to a site located on the western fringe of Hungerford to the south of North Standen Road/Smitham Bridge Road. This report has been based on a site visit which was undertaken during May 2021 together with an analysis of environmental data. The purpose of this report is to examine the suitability of the site for residential development from a landscape and visual perspective. The analysis has been informed with regard to a number of landscape and visual parameters and is illustrated in the Opportunity and Constraints Plan at appendix 4.

Development Context

- 1.2 The site is identified by the red line which is shown on the Site Location Plan at appendix 1. The site is bounded to the north in part by a residential road known as North Standen/Smitham Bridge Road. Smitham Bridge Road extends westward as far as the junction with Penny Farthing Close. West of this junction the road turns into North Standen Road which lies immediately to the north of the site and runs westward from Hungerford to connect with the village, Froxfield. The majority of the northern boundary is contiguous with the boundary of a number of residential curtilages which face onto North Standen Road/Smitham Bridge Road. The eastern boundary is defined by some trees and scrub which abuts a small commercial business park which comprises of a number of conjoined industrial units. The southern and western boundaries of the site are demarcated by a mature wide native treebelt.
- 1.3 In terms of its development context, the site is framed to a significant degree both in physical and visual terms by development. Immediately to the north of the site lies North Standen Road/Smitham Bridge Road which is flanked on either side of this highway with residential properties which forms part of the western fringe of Hungerford. Immediately to the east of the site lies a small industrial trading estate which accommodates a number of small businesses, beyond which and further to the east lies an extensive residential district lying to the west of the A338 High Street. This existing development collectively forms a strong development framework with regard to the site. As a consequence, proposed residential development located across the site would effectively dovetail into the existing residential areas located to the north and east and would not result in

any material extension of the settlement, either to the west or to the south which forms open countryside.

Environmental Designations

- 1.4 There are a number of statutory and Local Plan environmental designations in the locality. However, few of these affect the site as is illustrated in the plan at appendix 2. The site itself lies within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). This designation not only extends over the surrounding countryside, but also washes over the whole of Hungerford as a town and includes its environs. The settlement itself and all its built infrastructure form an integral part of the AONB and defines it in landscape character and visual terms at the local level. As a consequence, it is clear that the AONB designation is not a bar to residential development, however, any development needs to have regard to the AONB Management Plan and relevant planning policies.
- 1.5 In terms of public rights of way, there is a public footpath, (PROW HUNG/46/1) which runs from the western side of Hungerford due south into the countryside running parallel to and to the west of Salisbury Road. This footpath passes along the eastern side of the site to connect into North Standen Road/Smitham Bridge Road. This highway is also part of the Sustrans cycle network (and is referred to as reference no. 4). The footpath clearly links the countryside to the town so the fact that the site accommodates a residential neighbourhood would not materially harm the amenity of this path as it terminates at the town in any event. Furthermore, the sense of arrival at the settlement would not change with the proposal in place. The point of arrival lies to the south of the site. The cycle route along the adjacent road would neither be materially affected.
- 1.6 There are extensive areas of open access land and registered common land located to the north of the site and north-west of Hungerford which would be physically and visually unaffected by any proposed residential development and would not present any constraint.
- 1.7 The centre of the town accommodates an extensive Conservation Area which envelopes the majority of the Listed Buildings flanking the high street. All of which as a heritage asset would be physically and visually unaffected by the proposed residential use of the site from a landscape and visual perspective.

- 1.8 In terms of flood risk, the site lies outside Environment Agency flood zones 2 and 3 which is self-evident when seen on the ground.
- 1.9 Having considered the local environmental designations it is considered that the site is significantly free of such constraints accepting the site and the town lie within the AONB.

Sustainability

- 1.10 The settlement of Hungerford is a large settlement. It has a wide range of community facilities. A large residential area is located immediately to the east of the site and north of North Standen Road/Smitham Bridge Road. The latter would provide good vehicular and pedestrian connectivity for the proposed development.
- 1.11 A proposed residential neighbourhood would abut and dovetail into the adjacent residential areas and roads such as North Standen Road and Smitham Bridge Road. There is a wide range of facilities situated nearby with a commercial trading estate located immediately to the east of the site along with a range of facilities further along Smitham Bridge Road linking into Church Street and then the High Street. Proposed residential use of the site, given it is adjacent to existing residential and employment land on the west fringe of Hungerford is therefore inherently situated in a sustainable location.

Topography

- 1.12 The site and the surrounding area which includes Hungerford is part of a lowland landscape but is gently undulating. Hungerford sits on local high ground, however on its western side it descends quite noticeably into a tributary valley which is broadly orientated north-south and runs into the River Dun Valley, which the A4 Bath Road follows. The site itself lies on the western side of this tributary valley and has a clear pronounced slope with an easterly aspect. The slope extends from the western boundary at a height of approximately 115M AOD and descends to the eastern boundary which lies at approximately 100M AOD and forms the base of this valley. The residential area immediately to the north of the site is located on the same part of the slope and as such, any proposed development would have topographic continuity with this residential area which flanks North Standen Road/Smitham Bridge Road. Immediately to the east of the site lies the pronounced west facing slope of the other valley side and as such, reveals the

residential area clearly rising up this slope. The site topographically faces towards the town and therefore has a visual relationship with the settlement.

- 1.13 The site exhibits a consistent slope of moderate gradient and whilst this should not present a constraint to development, nonetheless the layout of the residential area will need to take into account this topography as it extends across the site.

General Visual Amenity

- 1.14 In overall terms, the site benefits from a high degree of visual enclosure. The topography as it sits on the western side of a valley would severely limit the opportunity to observe the proposed development from viewpoints from the countryside to the west of the site.
- 1.15 The existing residential neighbourhood immediately to the north of the site would limit views from the north and north-west whilst the business park and residential area to the east of the site would further limit opportunities to observe development on the site in terms of views from the town to the east, looking westward.
- 1.16 There lies countryside immediately to the south of the town, but this rural area only accommodates one public footpath which is orientated north-south and broadly follows the base of the tributary valley. From much of this route there would be limited opportunity to observe the proposed scheme. Where the path lies in the field south of the site there would be the opportunity to gain northward views towards the site. However, there is a mature native treebelt which runs along the southern and south-west boundary of the site. This feature can be seen on the site location plan at appendix 1. This is a wide treebelt extending 10M in width and comprises native shrubs and trees which are at a young mature stage and extends to approximately 12M in height along the length of the continuous treebelt. It has a narrow break to accommodate the public footpath.
- 1.17 Given that the proposed development comprises two storey dwellings with a ridge height of approximately 9.5M, the proposed housing would not extend above the height of this treebelt in views from this footpath or from the road to the west, North Standen Road/Smitham Bridge Road (Sustrans cycle route 4), see photoviews appendix 3. In summer, when foliage is present, the proposed housing would be fully screened except for a glimpsed view through the footpath gap. Whilst during periods with foliage absent, the proposed housing would be

still screened to a significant degree with views heavily filtered and framed by the treebelt as can be seen in current views, see view from Sustrans route 4 to the west, appendix 3. Any heavily filtered views of housing on the site would not materially change the perception of the urban fringe of Hungerford as it relates to this part of the countryside. Significantly, there would be no material extension of the settlement as it would not extend Hungerford further west or south beyond the existing development envelope.

Vegetation

- 1.18 The site is broadly triangular to square in shape. The site is currently managed as grassland but does not appear to be grazed. This is in contrast to the adjacent fields which are in arable use. The existing grass sward would necessarily need to be removed to accommodate proposed residential development. There is a low hedgerow fronting onto North Standen Road/Smitham Bridge Road in the western part of the northern boundary, which could be removed to accommodate vehicular access. The eastern boundary is defined by some young mature trees and hedge with scrub which runs into the south-eastern corner where there is a small area of treecover. The western and south-western boundaries exhibit a mature treebelt which provides significant physical and visual containment and should be retained. This treebelt is at a young mature stage. It is recommended that the dwellings should be set back 10M from this treebelt given its growth potential, existing root plate and shadows cast northwards. The 10M offset can form garden space which can include garages and driveways, with garages set back by 5M. The vast majority of this vegetation across the site can and should be accommodated within any design layout which will also assist in creating a strong sense of landscape maturity.

Landscape Character

- 1.19 It is evident from field observation of the site and the surrounding countryside that the site benefits from significant physical and visual containment as it is located on the western side of a narrow tributary valley which is broadly orientated north-south. Beyond the boundary of the settlement and the site, there is a sense of rurality, but it is substantially visually influenced by the presence of Hungerford which has an urbanising influence and as such has an urban fringe character.

1.20 The proposed masterplan envisages a small residential neighbourhood which would be set within the retained vegetation that frames the site. As a consequence, the proposed residential area would have a strong sylvan backdrop which reflects the general character of the immediate locality. The proposed residential development would be in keeping with the general character and appearance of the local existing residential neighbourhoods.

Potential Development Framework

1.21 The site is well related to the western urban fringe of Hungerford. It would be seamlessly integrated with the existing residential development which flanks the North Standen Road/Smitham Bridge Road.

1.22 In terms of environmental designations, there is a public footpath which extends across the site which should be accommodated with the route retained to avoid any diversion requirements and to continue to provide connectivity to the countryside to the south. The site is located within the AONB, however, this designation washes over the whole of Hungerford and 74% of West Berkshire District. If any development and residential sites are to come forward within Hungerford, all of them would lie within the AONB and as such, is a common denominator to all sites. The AONB is extensive and inevitably given its extent, there will be variability in the quality of this environment. In this regard, the scenic qualities and natural beauty associated with the site is limited and compromised by the strong visual and physical relationship with the adjacent business park which creates a strong urban fringe character to the locality.

1.23 The site is in a highly sustainable location with good vehicular and pedestrian connectivity opportunities. Whilst the site exhibits a moderate gradient, this would not present a material constraint to development of the site. The site benefits from a high degree of visual containment due to the mature tree cover along its perimeters, all of which can be retained as part of the scheme's green infrastructure.

1.24 In terms of proposed layout, pedestrian and vehicular access is most likely to be located in the north western corner, subject to highway advice. Any open space associated with the proposal should be configured in the form of a landscape corridor which accommodates the existing public right of way, particularly as this will have local amenity value. The remaining area of the site is unconstrained, though built form should be set back from the mature tree belt to ensure that its

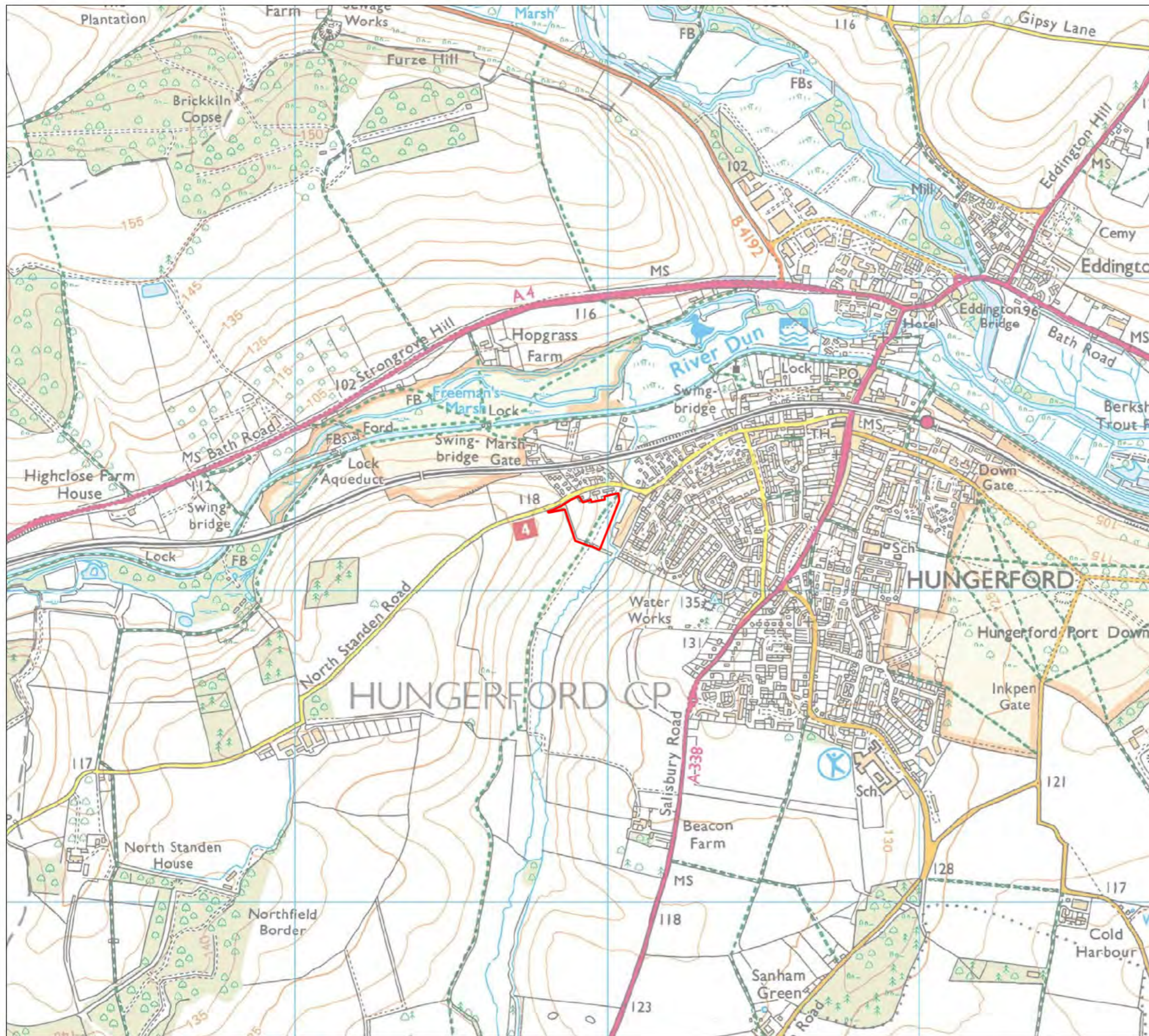
future growth is not compromised enabling it to continue to be retained to provide a strong framework to the proposal.

- 1.25 A residential scheme within the site would ensure that the proposal would respect the grain of the landscape and in so doing would be in keeping with the general character and appearance of other residential neighbourhoods in the locality. This design approach would ensure that the proposed residential scheme, as shown in appendix 4, would be successfully integrated into the existing landscape framework of the site and surrounding townscape.

Prepared by Andy Cook
Executive Director
25th May 2021

APPENDIX 1

SITE LOCATION PLAN



KEY

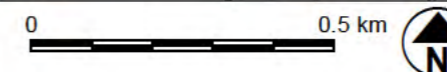
 Site Boundary

Revisions:
First Issue- 06/05/2021 AD

Site Location Plan

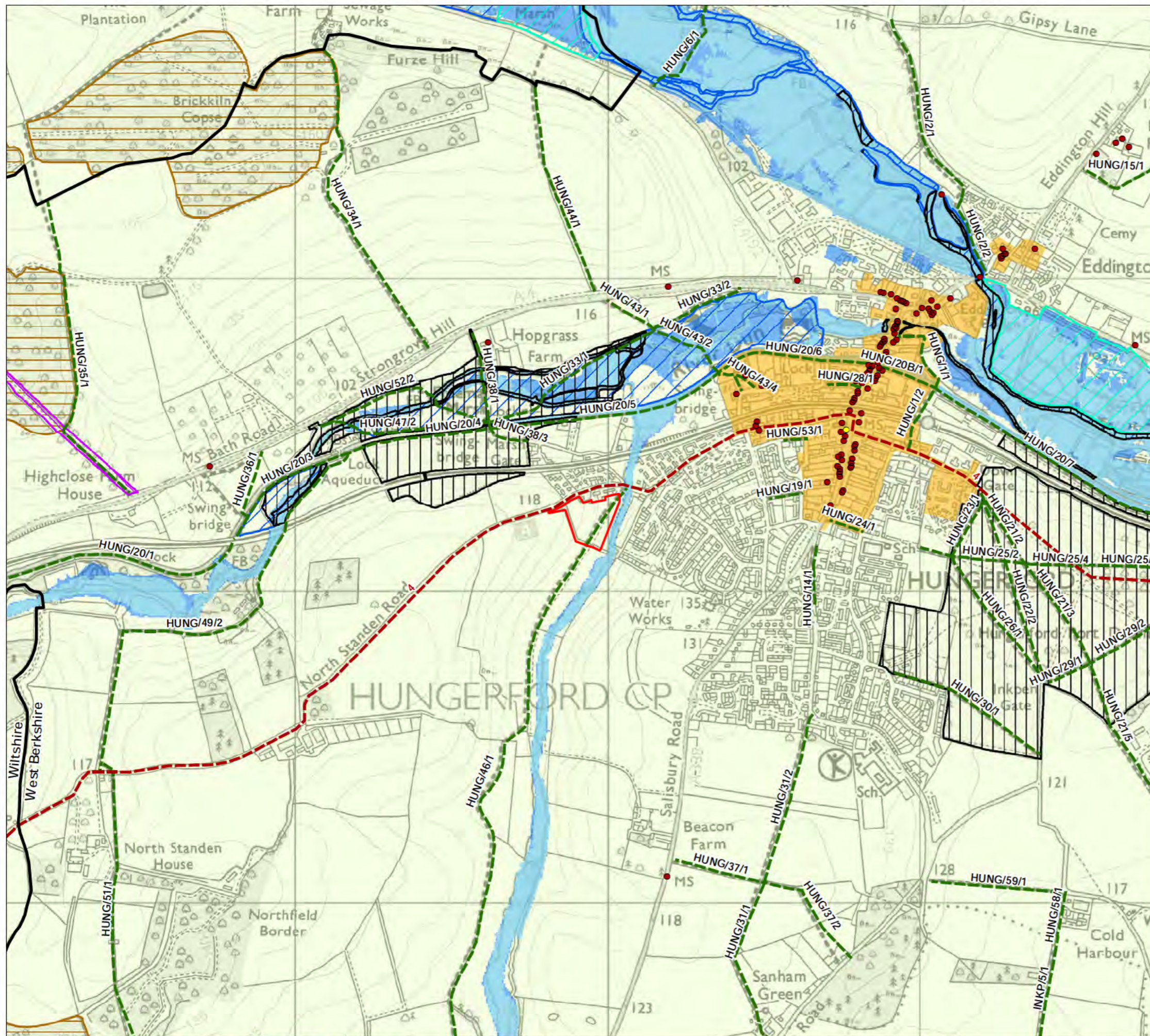
Land West of Hungerford

Client: Donnington New Homes
 DRWG No: **P17-0141_06** Sheet No: - REV: -
 Drawn by: AD Approved by: AC
 Date: 06/05/2021
 Scale: 1:12,500 @ A3



APPENDIX 2

ENVIRONMENTAL DESIGNATIONS PLAN



KEY

- Site Boundary
- Local Authority Boundary
- Grade II* Listed Building
- Grade II Listed Building
- Sustrans National Route
- Public Right of Way
- Open Access Land / Registered Common Land
- Registered Park / Garden
- Special Area of Conservation (SAC)
- Site of Special Scientific Interest (SSSI)
- Ancient Woodland
- Conservation Area
- EA Flood Zone 3
- EA Flood Zone 2
- North Wessex Downs Area of Outstanding Natural Beauty (AONB)

Revisions:
First Issue- 13/05/2021 AD

Environmental Designations Plan

Land West of Hungerford

Client: Donnington New Homes
 DRWG No: **P17-0141_07** Sheet No: - REV: -
 Drawn by: AD Approved by: AC
 Date: 13/05/2021
 Scale: 1:12,500 @ A3



APPENDIX 3

PHOTOLOCATION PLAN AND PHOTOVIEWS



KEY

- Site Boundary
- Viewpoint Location

Revisions:
First Issue- 13/05/2021 AD

Viewpoint Location Plan

Land West of Hungerford

Client: Donnington New Homes
 DRWG No: **P17-0141_09** Sheet No: - REV: -
 Drawn by: AD Approved by: AC
 Date: 13/05/2021
 Scale: 1:2,500 @ A3





VIEWPOINT 1 - View looking north towards mature tree belt.



VIEWPOINT 2 - Western mature tree belt.



VIEWPOINT 3 - Adjacent business park and residential area beyond.



VIEWPOINT 4 - Public right of way on northern boundary.



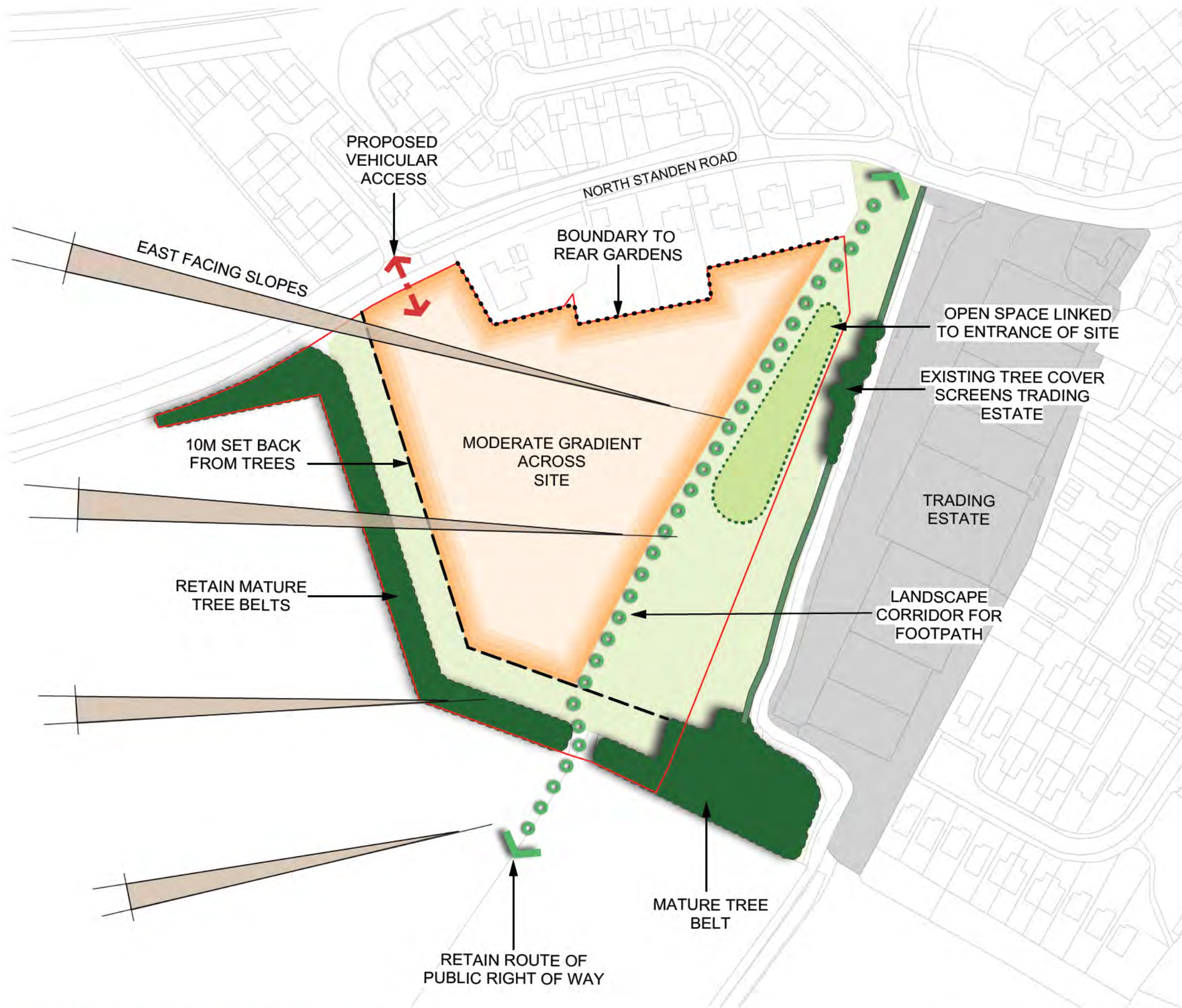
VIEWPOINT 5 - Northern boundary adjacent to North Standen Road.



VIEWPOINT 6 - View from the west showing screening effect of tree belt.

APPENDIX 4

OPPORTUNITIES AND CONSTRAINTS PLAN



- KEY**
- Site Boundary
 - Proposed Residential Area

Revisions:
 First Issue- 13/05/2021 AD
 A - (25/05/2021 JS) Revised vehicular access point
 B - (26/05/2021 AD) Revised layout

Opportunities & Constraints

Land West of Hungerford

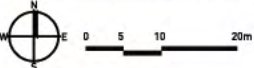
Client: Donnington New Homes
 DRWG No: P17-0141_10 REV: B
 Drawn by : AD Approved by: AC
 Date: 26/05/2021
 Scale: 1:1250 @ A3



APPENDIX 5

REVISED MASTERPLAN

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LAND WEST OF HUNGERFORD - ILLUSTRATIVE MASTERPLAN

