

**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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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	Mr
First Name:*	Paul	James
Last Name:*	McCann	Iles
Job title (where relevant):	Strategic Land Director - England	Director
Organisation (where relevant):	CALA Homes (Chiltern) Ltd	Pro Vision
Address* Please include postcode:		The Lodge, Highcroft Road, Winchester, SO22 5GU
Email address:*		
Telephone number:		01962 677044

*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):	CALA Homes (Chiltern) Ltd
---	---------------------------

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP12
Appendix:	
Policies Map:	
Other:	

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:

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		x
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		x
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		x
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		x

Please give reasons for your answer:

Please refer to our representation statement (reference 51206).

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

x

Please give reasons for your answer:

Please refer to our representation statement (reference 51206).

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 our representation statement (reference 51206).

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:

To examine our objections to the development strategy.

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	<input checked="" type="checkbox"/>
The publication of the report of the Inspector appointed to carry out the examination	<input checked="" type="checkbox"/>
The adoption of the Local Plan Review	<input checked="" type="checkbox"/>

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	James Iles	Date	2 March 2023
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Signature	James Iles	Date	2 March 2023
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WEST BERKSHIRE LOCAL PLAN REVIEW

Representation on Regulation 19 Consultation on the
proposed submission West Berkshire Local Plan Review 2022
– 2039 (dated January 2023)

Prepared by Pro Vision on behalf of CALA Homes (Chiltern) Ltd

2 March 2023

REPRESENTATION ON REGULATION 19 CONSULTATION ON THE PROPOSED SUBMISSION WEST
BERKSHIRE LOCAL PLAN REVIEW 2022 – 2039 (DATED JANUARY 2023)

WEST BERKSHIRE LOCAL PLAN REVIEW

PROJECT NO. 51206

PREPARED BY:

JAMES ILES MRTPI

DATE:

2 MARCH 2023

PRO VISION

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CONTENTS

1.0	Introduction and background	1
2.0	The housing requirement	2
3.0	Meeting the housing requirement.....	6
4.0	Land South of Pinchington Lane, Greenham, Newbury.....	12
5.0	Conclusion.....	16

APPENDICES

Appendix A – Land south of Pinchington Lane, Greenham, Newbury, Pro Vision, July 2022.....	
Appendix B – Land south of Pinchington Lane, Greenham Common, West Berkshire: Heritage Assessment (RPS Group, 21 September 2022).....	

1.0 Introduction and background

- 1.1 This representation is made by Pro Vision on behalf of CALA Homes (Chiltern) Ltd (abbreviated to 'CALA').
- 1.2 In summary, we have concerns that the Local Plan Review (LPR) is not sound in several respects and that modifications to the development strategy are required. As such, we identify proposed amendments to help remedy the issues we identify.
- 1.3 We elaborate on representations made at previous stages of the plan (Regulation 19 consultations) as well as commenting on new evidence and amendments to the spatial strategy.
- 1.4 CALA has one other interest in the district in the context of the LPR. This representation is made specifically in the context of its land interests at Pinchington Lane, Greenham, Newbury,¹ and the overall development strategy. As such, CALA is a stakeholder in the proposed development strategy.
- 1.5 CALA has made separate representations on other interests², and sections 2 and 3 are common to both representations, dealing with district wide matters, before looking at site specific matters.
- 1.6 In summary, this representation identifies potential issues of soundness³ with the LPR:
- The approach to setting the housing requirement for the district;
 - The approach to meeting the requirement; and
 - And that in this context, that available sites in the HELAA, including GRE1, have been unduly assumed to be unsuitable for this plan period.

¹ The sites is identified as Land south of Pinchington Lane, GRE1, in the Housing and Economic Land Availability Assessment (HELAA).

² CALA has made separate representations on its interests at Salisbury Road, Hungerford (HELAA sites HUN12 and HUN14).

³ With reference to the tests of soundness set out in the National Planning Policy Framework, 2021 (paragraph 35).

2.0 The housing requirement

- 2.1 We have concerns regarding the effectiveness of the proposed development strategy as set out for housing in Policy SP12.
- 2.2 Policy SP12 explains that provision will be made for a range of 8,721 to 9,146 net additional homes for the plan period.
- 2.3 We consider that there is clear justification for higher housing growth in the district to meet the level of need identified in the evidence, not least in respect of addressing affordability.

Affordable housing

- 2.4 Addressing affordability of homes in the district is clearly a very significant matter for the LPR.
- 2.5 The Vision (Chapter 3) of the Plan states that the Council will ensure that delivering “...housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability” [our emphasis].
- 2.6 This is backed-up by the evidence base. The Updated Housing Needs Assessment (dated, July 2022) confirms that there is a “notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the District” [our emphasis]. The conclusion adds that “the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise” [our emphasis].
- 2.7 The report advises that the scale of affordable housing need is 697 dpa (a 188% increase on need following the Council’s Housing Needs Assessment in 2020). This is also 136% of the standard method minimum LHN. Accordingly, the report advises that theoretically, if 40% of all new housing delivered was for affordable housing around 1,740 dpa would be needed to meet West Berkshire’s affordable housing need in full (paragraph 3.24). The Council’s affordable housing position is clearly worsening.
- 2.8 It is acknowledged that the delivery of housing in line with the standard method figure may over time improve the affordability of market housing (and thus reduce affordable housing needs) through the affordability uplift in the standard method. However, West Berkshire’s past housing delivery rates have generally been in line - if not greater - than the current minimum LHN and yet affordability problems/affordable housing need remains pressing. As

a result, not positively addressing the affordability problems and affordable housing need across West Berkshire in this plan period could have significant social and economic consequences which do not appear to have been appropriately considered, including in the Sustainability Appraisal (SA/SEA) for Policy SP12.

- 2.9 In this context, we have doubt that the LPR's housing requirement will be effective in improving affordability and therefore risks failing to deliver on its own vision. For this reason, the calculation of affordable housing need supports an increase in the overall housing requirement.

Buffer to housing supply

- 2.10 The LPR's housing target includes a 5% 'buffer' on top of the LHN at the top end of the range.
- 2.11 The Council states in its Housing Background Paper (HBP) that its plans to meet the upper of the range in an effort to boost supply and have some built-in flexibility⁴.
- 2.12 The Regulation 18 version of the West Berks LPR included a 10% buffer. The Council's explanation for the reduction is the limitations and constraints of a largely rural district⁵. On the face of it, that is justified by the Written Ministerial Statement in the HBP.
- 2.13 However, this appears to be counter-intuitive; the greater level of constraint, the greater level of buffer is required to provide greater prospect of meeting the housing need, especially where one of the Plan's priorities is to improve affordability. Furthermore, the SA/SEA undertakes an analysis, at Appendix 4 Section 2.1, between LHN+ 5% and LHN+ 10%. The LHN + 10% scores significantly better with 'overall positive, with some significantly positive effects'. However, the SA/SEA concludes at Table 26 of the report that this would put the rural nature of the district at undue pressure. The SA/SEA therefore takes forward a apparently incorrect interpretation of the evidence base.
- 2.14 The Council does not provide any justification that a 10% buffer/uplift (or greater) to the housing requirement could not be accommodated within the district. Indeed, none of the key environmental constraints (e.g. AONB) in the district or the rural nature of the district preclude the principle of residential development (different to floodplain, Green Belt,

⁴ Housing Background Paper (January 2023); paragraph 2.36.

⁵ Housing Background Paper (January 2023); paragraph 2.33.

internationally protected habitats etc.), but instead will shape the scale, form and direction of growth across the district via the broad spatial strategy.

- 2.15 Evidence in the HELAA indicates that there are many more available sites in the HELAA to accommodate further growth, notwithstanding that not all of them can be expected to prove to be suitable and achievable.
- 2.16 In addition, an appropriate buffer will support greater flexibility in the Plan if the anticipated housing supply does not deliver. This is considered further at Section 3 below.
- 2.17 A more effective buffer/uplift to the housing requirement is likely to fall between 10-20%. This would increase the Council's target housing requirement to 564 - 616 dpa, which would equate to finding a supply of 9,588 – 10,472 dwellings up to 2039. This would more closely follow the tried and tested approach in other recently adopted Local Plans, including South Oxfordshire (c. 27% buffer), Windsor & Maidenhead (c. 12% buffer), and North Herts (c. 13% buffer), notwithstanding that all of these districts vary in the precise nature of their constraints and opportunities. Further, the neighbouring draft Wokingham Local Plan currently includes a 20% buffer.

Duty to cooperate

- 2.18 The LPR⁶ notes that there is a current unmet need from Reading Borough Council of around 230 dwellings up to 2036 and that there will be a need to consider any further unmet need given the housing needs generated by the standard method (i.e. the government's 35% uplift to Reading as one of the largest urban areas in England)⁷.
- 2.19 Reading has identified that a five year review of its Plan is required by 2024. This will need to include an urban capacity assessment. A revised future unmet need figure is therefore likely to be available shortly. It is anticipated that the future unmet need from Reading will be significant – the housing requirement increases to 907 dpa from Lichfield's analysis of the standard method for local housing need, dated April 2022 (from 689 dpa in the current Reading Borough Local Plan). However, at this stage without further evidence there is no certainty on what the unmet need will be or how it will be redistributed. However, it is widely accepted that Reading has limited land capacity to deliver these additional housing requirements in full

⁶ Paragraphs 6.5 to 6.8

⁷ Discussed at paragraph 2.24 of the Housing Background Paper (January 2023).

and, therefore, highly likely that neighbours, including West Berkshire will be required to deliver in meeting some of this unmet need.

- 2.20 In this context, it is appropriate that the LPR plans positively for greater flexibility in its housing requirement rather than reacting to events during the plan period.

3.0 Meeting the housing requirement

- 3.1 We have reviewed the proposed development strategy and have identified areas of concern its effectiveness to deliver the housing requirement over the plan period.
- 3.2 The LPR identifies several sources of housing supply across the plan period at Table 2 of the Plan. These include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the Local Plan Review and Neighbourhood Plans.
- 3.3 In terms of existing allocations, the history of some of these sites identified in the supply that do not currently have planning permission (around 95 units, excluding Sandleford Park West) or only have outline permission (392 units, excluding Sandleford Park East) or where a site's delivery has been continually delayed clearly does not support confidence in their timely delivery. As such, it is considered that a 10% non-implementation rate is factored in to, at least, some of this supply would provide a more robust strategy.
- 3.4 In terms of non-allocated sites with planning permission, Table 2 shows that nearly 1,958 dwellings are provided on un-allocated sites (including prior approvals) with planning permission. Again, a 10% non-implementation rate would provide a more robust strategy as it is unlikely that all these permissions will be delivered over the plan period, for various reasons, potentially including changing constraints (such as the phosphates issue in the Lambourn catchment).

Windfall allowance

- 3.5 The housing supply includes a windfall allowance of 1,949 dwellings (or 26.6% of the total housing supply) up to 2039. It has been based on the average annual delivery on small sites of less than 10 units (excluding prior approvals for permitted development) between 2006 – 2022.
- 3.6 In the context of the latest consultation on the revised NPPF and the Levelling Up and Regeneration Bill also place a greater emphasis and need to provide a genuinely plan-led system, we consider that the LPR would be more effective if it relied less significantly on this level of unplanned development. A more positively planned approach would help to ensure greater deliver of affordable homes, noting that small windfall sites are generally less able to

deliver this and over reliance on them risks exacerbating the affordability issues in the district and failing to deliver on a key priority of the plan (as discussed above).

- 3.7 The Council contend that past delivery of windfalls has been consistent and reliable. The Council has not provided any evidence however about future supply to justify such an approach.
- 3.8 There also appears to be a recent trend that yield from windfalls are reducing on small sites. As set out at Table 3.1 of the Housing Background Paper the delivery over the last three years 2019/20 to 2021/22 has reduced to an annual average of 97 completions. Indeed, in the last five years the annual average is also only 112 completions, notably lower than LPRs anticipation of 140 dpa. What evidence is there to give confidence that the rates will increase over the plan period?
- 3.9 In addition, it is also worth noting the windfall allowance is taken from smaller sites (i.e. less than 10 new homes) and, therefore, a reliance on sites for potentially between 1-4 dwellings in the housing supply will not deliver any affordable housing and further
- 3.10 The implications of this are important. Even a relatively modest but more realistic reduction in the windfall allowance from 140 to 100 dpa would reduce immediately the total housing supply by, at least, 549 dwellings.
- 3.11 A more robust and effective alternative is to take forward more of the available and suitable sites from the HELAA. This will reduce the reliance on windfall sites and provide greater certainty of supply in a positively-planned way.

New allocations

Sandleford Park (as allocated at Policies SP13 and SP16)

- 3.12 The HBP, at Appendix 2, sets out the housing trajectory including the phasing of individual sites.
- 3.13 The Council contends that Sandleford East (which benefits from outline planning permission) will begin delivering 100 dpa from 2025/26 through to 2034/35, with 80 dwellings provided during the year 2035/36.

- 3.14 This appears to be an optimistic timetable, particularly given the previous planning delays with the site (allocated in 2012), that we understand a reserved matters application has yet to be submitted for any phase(s) and the need to address several planning conditions prior to commencement of construction. The start date of 2025/26 for first completions therefore seems very much a ‘best case scenario’.
- 3.15 It is understood that the site is being delivered by a single housebuilder. This therefore could lead to a lower absorption rate due to lack of variety of housing product in accordance with the findings of Letwin’s Independent Review of Build Out (October 2018). The 100 dpa across the plan period therefore is likely to be impractical and affect site delivery over the plan period.
- 3.16 With regards to Sandleford West, this site does not have any planning permission despite an outline application being submitted in April 2018. It appears that the Council are awaiting an amended package of information and revised plans. Therefore, first completions in 2027/8 is simply conjecture. There will also be a need to submit and agree reserved matters and address conditions ahead of that time.
- 3.17 With the above in mind, it is considered that the Council should take a more cautious approach with the delivery of Sandleford Park during the plan period. The Regulation 18 Consultation noted that Sandleford Park was expected to deliver 1,000 dwellings across the plan period. This seems a more robust figure than the 1,580 dwellings now proposed, and a more realistic basis for the LPR’s development strategy.

North East Thatcham (as allocated at Policies SP13 and SP17)

- 3.18 The Council has reduced the delivery of NE Thatcham from a total of 2,500 dwellings to 1,500 dwellings. Notwithstanding this, the Council anticipate that NE Thatcham will deliver 1,500 homes over the plan period (compared to 1,250 dwellings expected at the Regulation 18 stage). For reasons we discuss below, this appears to be unjustified.

The justification for NE Thatcham

- 3.19 The supporting evidence base for NE Thatcham - including the Thatcham Strategic Growth Study (which includes a Vision and Concept Plan) - still refer to the delivery of 2,500 homes and has not been updated to reflect the position in the current version of the LPR. This also

includes the Viability Testing which tested 2,300-2,500 new homes. This work would need to be updated for any Plan to be found sound.

3.20 The site allocation policy also still refers to the delivery of the secondary school. However, there is no updated viability appraisal to confirm that this is deliverable for a site of 1,500 new homes in total. This raises the following concerns:

- The Thatcham Growth Study (Stage 3) acknowledges that strategic development at this scale (i.e. 2 500 new homes) is the only approach that is likely to deliver an additional secondary school for the town, without which any growth would cause issues in provision.
- Again, the Thatcham Growth Study (Stage 3) notes that the scale of development (i.e. 2,500 new homes) would not create the need for a secondary school development on its own and, therefore, is only half-funded by developer contribution. A reduction to 1,500 new homes is therefore likely to increase this funding gap further, with no indication of how this additional funding will be resolved.
- A secondary school would internalise a significant number of trips from the proposed development. Indeed, the Access and Movement Report for NE Thatcham in the Thatcham Growth Study (Stage 3) assumes that the secondary school will have 50% internal trips. Therefore, with question marks over the potential delivery of a secondary school for a site of 1,500 new homes, the sustainability credentials of NE Thatcham are uncertain.

3.21 As a result, the identification of NE Thatcham is lacks evidence to support the allocation of for 1,500 new homes. In particular, the lack of delivery of a secondary school and reduction in housing numbers would take away the key justification for growth at this location to help deliver new education provision and additional community infrastructure. The SA/SEA, at Appendix 4, acknowledges this but the Council still proceed on this basis as it is considered that 2,500 new homes in Thatcham is too many.

3.22 There is a confused picture in the evidence base. We note the publication of the West Berkshire Strategic Vision (November 2022), which is explained to be a response to paragraph 22 of the NPPF (requiring local plans to look beyond the plan period where they include larger scale developments).

- 3.23 This evidence suggests that there remains intention for a much larger development at NE Thatcham than the 1,500 homes now included in the LPR. The settlement boundary amendments, and site boundaries identified in the LPR⁸, are unchanged from Regulation 18, gives clear indication that a more substantial development is planned for⁹.
- 3.24 The LPR, however, makes no reference to this strategic vision. In which case, there is a potential conflict with national policy (specifically NPPF 22).
- 3.25 We also note that, whilst the vision has been subject of targeted stakeholder consultation, it has not been published for public consultation as part of the Draft LPR at Regulation 18 stage.

Scale and timescales for Housing Delivery

- 3.26 Notwithstanding the above, the Council's assumptions on the expected housing supply from NE Thatcham are also clearly unreasonable.
- 3.27 The Housing Background Paper demonstrates that the Council expect NE Thatcham to start delivering 150 dpa from 2029/30 to 2038/2039. On the face of it, this appears to be overly optimistic¹⁰.
- 3.28 The market evidence demonstrates that for schemes of 1,500 dwellings, the lead-in time from validation of an application through to first completions is approximately 7 years (Source: Lichfield's Start to Finish (2nd Edition), dated February 2020). As such, given the timescales for the adoption of the Plan (i.e. late 2024 in the LDS) and taking a view that the planning application for this site is submitted by the end of 2024/2025, first completions cannot be projected before 2031/2032. This timescale may be optimistic given there is a need to prepare and agree to a coherent masterplan or development framework, and if, for example, prior mineral extraction is required and/or there are delays to the adoption of the Plan.
- 3.29 As noted with the delays with Sandleford Park, and its need for a Secretary of State decision, delivery of strategic allocations is challenging.

⁸ Policy SP17: NE Thatcham [map] (page 74)

⁹ Settlement Boundary Review (December 2022); Map 45 (dated March 2021)

¹⁰ The Strategic Vision 2050 is even more ambitious/unrealistic by assuming first completions by winter 2026 (and assuming an outline planning application this spring)

- 3.30 Furthermore, market evidence suggests that for sites of 1,500, a realistic average annual build out rate is c.100-120 dpa (Source: Lichfield's Start to Finish (2nd Edition)). As such, delivering completions from 2031/32 at 120 dpa would therefore equate to, at best, 960 dwellings over the plan period. A shortfall of 540 dwellings.
- 3.31 In conclusion on the matter of meeting the housing requirement, we consider that the LPR is unsound as it:
- Does not provide sufficient contingency for non-delivery of currently extant planning permissions;
 - Relies heavily on windfall sites, when there are many alternative available sites identified in the HELAA;
 - Is unrealistic in its assumptions about delivery rates at the strategic allocations;
 - Lacks a vision for strategic development beyond the plan period.
- 3.32 If found unsound on these points, the remedy is to revisit the HELAA and engage with the promoters and other stakeholders to bring forward more of the most suitable sites for development.

4.0 Land South of Pinchington Lane, Greenham, Newbury

4.1 CALA is promoting land at Pinchington Lane for residential development (HELAA site GRE1).

4.2 In the context of the preceding sections identifying potential weaknesses in the development strategy of the LPR, and noting that there are many more available sites in the HELAA that could be brought into a more effective strategy, we now briefly address the evidence base in respect of the assessment of GRE1.

4.3 The latest HELAA¹¹ concludes that the site is unsuitable for development. Previous versions, however, considered it “potentially developable”¹².

4.4 Further consideration of the latest site assessment criteria indicates that the latest conclusion is unsound or at least premature in the absence of further site specific survey. Neither is it consistent with the Policy DM12 (Registered Parks and Gardens), which makes it clear that development within, or otherwise affecting, these designations is not necessarily precluded, but that care and attention is needed over managing the impacts. The supporting text explains that applications (for development) within or adjoining parks and gardens “will therefore be expected to protect the special features, historic interest and setting of the designed landscape”¹³.

4.5 In summary, the HELAA assesses the site to be:

- Not impacting the AONB;
- Adjoining the settlement boundary;
- Benefiting from Local Highways “initial support”, noting the potential access and suitable visibility, and would require further traffic survey (common to other potential development sites);
- At low risk of river flooding; surface water can be managed on site and low risk of groundwater flooding, and no recorded history of flooding;
- Absent of open space designations;

¹¹ January 2023

¹² Strategic Housing Land Availability Assessment (site ref NEW057).

¹³ LPR paragraph 10.103

- At low risk of contamination;
- Low risk of noise and vibration;
- Adjacent to protected wildlife areas (Greenham and Crookham SSSI) and within a biodiversity opportunity area, therefore, detailed site assessment is needed noting that at least part of the site may be suitable but care and mitigation will be needed;
- Outside of the Nutrient Neutrality Zone;
- With some TPO trees surrounding the property (but few within);
- Within a Registered Park and Garden, a designated heritage asset, where development is normally inappropriate, but the recommendation is for further site specific heritage assessment;
- Within minerals safeguarding area, possibility of prior extraction;
- No other suitability observations are made beyond these standard considerations.

4.6 The HELAA's overall conclusion is that the site is "unsuitable" simply due to the heritage impact.

4.7 We would also note that the site is outside of the Detailed Emergency Planning Zone (DEPZ¹⁴).

4.8 Overall therefore, we consider that the evidence clearly indicates that the site is well located to the built-up area, and has many positive attributes, and is worthy of detailed consideration, including with site specific heritage and ecology assessment.

4.9 To assist the Council in this, CALA has submitted a vision for the development of the site and commissioned a heritage report¹⁵, copies of which are appended to this statement. This was submitted to the Planning Policy team last year, and its receipt was acknowledged. However, we note that no acknowledgement of this evidence has been given in the updated HELAA.

4.10 In summary, the heritage statement concludes that there is realistic expectation of less than substantial harm from development of part of the site:

¹⁴ LPR Policy SP4.

¹⁵ Land South of Pinchington Lane, Greenham Common, West Berkshire: Heritage Assessment (RPS Group, September 2022).

In conclusion the site of the proposed development has low potential to impact on below ground archaeology dating to before the creation of the Sandford Parkland. However it is likely that as a 'greenfield' site further evaluation to assess this potential by the conventional methods of geophysical survey and trial trenching are likely to be requested by the local authority.

The site, whilst within the RPG is in private ownership and has been since the 1930s. The site is not accessible from or connected by footpaths to the remainder of the RPG to the south west.

There is therefore no public appreciation or physical indicators of it as being part of a wider landscape setting. The significance and relevance of the RPG designation upon the site has been significantly reduced by the residential development to the west and the site does not in any real sense relate to the remaining significant portion of the RPG situated around St Gabriel's school.

*With respect to the impact of development on the RPG this will be harmful, **though less than substantially harmful**. The impact of development will be due to the reduction in the parkland area, its transformation from parkland to residential and its visual presence when seen from outside the parkland and when viewed from within the park area.*

Mitigation to ensure the impact of the development is as low as possible may be achieved by employing the following design principles:

- *Enhancing the parkland by the inclusion of elements such as the historic driveways in the masterplan proposals (NPPF para 126; Core Strategy CS19).*
- *Limiting the impact of new housing on the northern boundary of the park by landscaping (Core Strategy CS19).*
- *Maintaining the present wooded character of the area (Core Strategy CS19).*
- *Ensuring that new development is appropriate in terms of scale and design in the context of the existing settlement form, pattern and character (Core Strategy CS19).*

The illustrative proposals seek to include these mitigation design principles through: the design of the layout referencing the historic driveways; the retention and enhancement of existing landscaping on the northern boundary; by maintaining and seeking to enhance the woodland area to the south west, including improving the setting around the fishpond to make it more

appreciable in the landscape and; by proposing a development that is carefully designed and considered in form, that will respond appropriately to the context around whilst have due regard and care for its setting within the existing RPG.

*The objective of applying these principles is to ensure that the potential impact of development **will be less than substantially harmful for the purposes of the NPPF**. (Our emphasis).*

5.0 Conclusion

- 5.1 CALA has land interests in the district and is committed to helping deliver sustainable growth in West Berkshire.
- 5.2 Following review of the Regulation 19 LPR, we have identified potential issues of soundness with the development strategy, including in regard to the housing requirement and the effectiveness of the supply strategy.
- 5.3 In this context, the obvious remedy is for the Council to revisit the evidence base, particularly the many available sites in the HELAA, and identify further suitable opportunities to bring more sites into the strategy.
- 5.4 This would help to ensure a more robust housing strategy and improve the prospects of improving the affordability of accommodation in the district, which quite rightly, in addition to other strategic priorities including planning for climate change, is a priority for the LPR.
- 5.5 In this context, it is appropriate to scrutinize at the Council's assessment of available sites and see if any have been overlooked unduly. Especially those sites outside of the major areas of constraint in the district, including the AONB, Nutrient Neutrality Zone and DEPZ, including GRE1.
- 5.6 We have identified that the Council's assessment of GRE1 as "unsuitable" is not justified by the evidence, that its original assessment is more reliable, and that site specific assessment of heritage matters (which CALA has already addressed) and ecology matters are properly understood.
- 5.7 CALA continues to promote the site as a potential residential development and is keen to continue assisting the Council, and other stakeholders, to clarify its precise development potential.

Appendix A – Land south of Pinchington Lane, Greenham, Newbury, Pro Vision, July 2022



Land South of Pinchington Lane, Greenham, Newbury

Contents

Introduction	4
Purpose	4
Background	4
Site and Surroundings	6
Site Location	6
Historic Development	7
Historic Context	8
Suitability Assessment	10
Social Context	10
Housing Land Assessment	12
Density Pattern Book	13
Planning Context	13
West Berks Local Plan Review to 2039	13
Site Analysis	14
Site Context	14
Access and Highways	16
Ecology	16
Heritage	16
Constraints and Opportunities	18
The Vision	20
Design Concept	20
Proposed Design	22
Conclusion	24

1. Introduction

1.1 Purpose

Pro Vision is acting on behalf of CALA Homes Ltd ('CALA') to promote approximately 3.66ha of 'Land South of Pinchington Lane' ('the Site')

The purpose of this document is to demonstrate the deliverability of the Site for residential development, and to promote its allocation in the emerging West Berkshire Local Plan Review.

The document sets the background context for the proposals. It describes the development site and its accessibility to the nearby facilities and services, examines the initial technical considerations of the Site (including accessibility, ecology and heritage) and culminates in a framework masterplan demonstrating how the Site can be developed.

This document has been produced in conjunction with the following consultants:

- CGMS – Heritage
- Pro Vision Ecology – Ecology and Biodiversity
- Rappor- Highways

1.2 Background

CALA has established a reputation for building high quality homes in desirable locations throughout the region. In recent years, CALA has worked in partnership with the Council and local stakeholders to bring forward land for new development, with a strong track record of delivering new homes across Berkshire.

CALA are keen to deliver a successful scheme on the Site that delivers a high-quality landscape-led development providing new homes that are sensitively integrated into the community in a sustainable location.

There is an opportunity to develop the Site to create a development that can deliver around 60 new homes, with a mix of house typologies and a variety of tenures to meet local need.

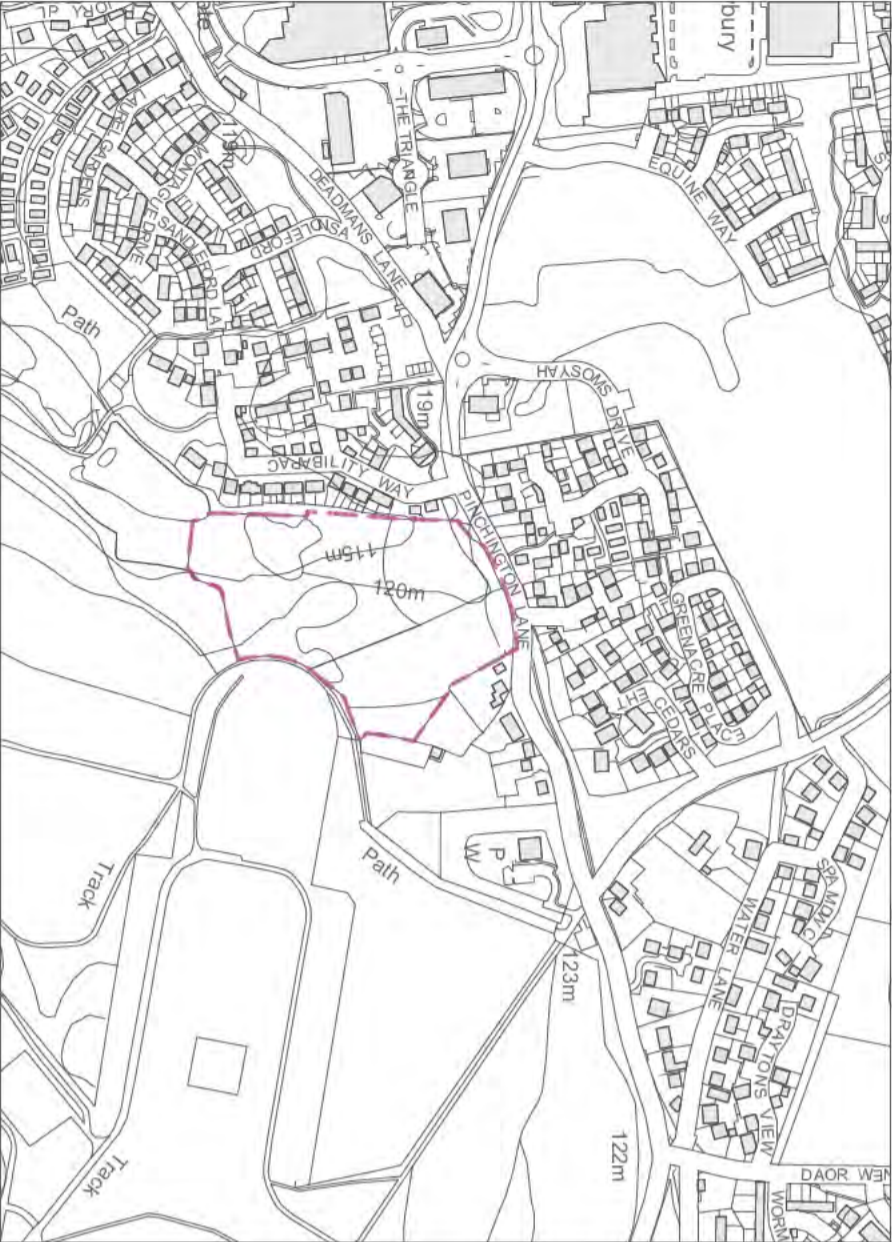


Aerial of Site and Surrounding Context Image © Google

2. Site and Surroundings

2.1 Site Location

The site is located to the south of Pinchington Lane in Greenham, Newbury. It is within the historic Registered Park and Garden (RPG) of Sandlesford Priors. The site is 3.66ha in size and comprises an area of open paddocks to the east and largely self-seeded woodland to the west and north. The site also abuts to Greenham Common in the south east.



Site Location Plan Ordnance Survey, © Crown Copyright 2022. All rights reserved. Licence number 100022432

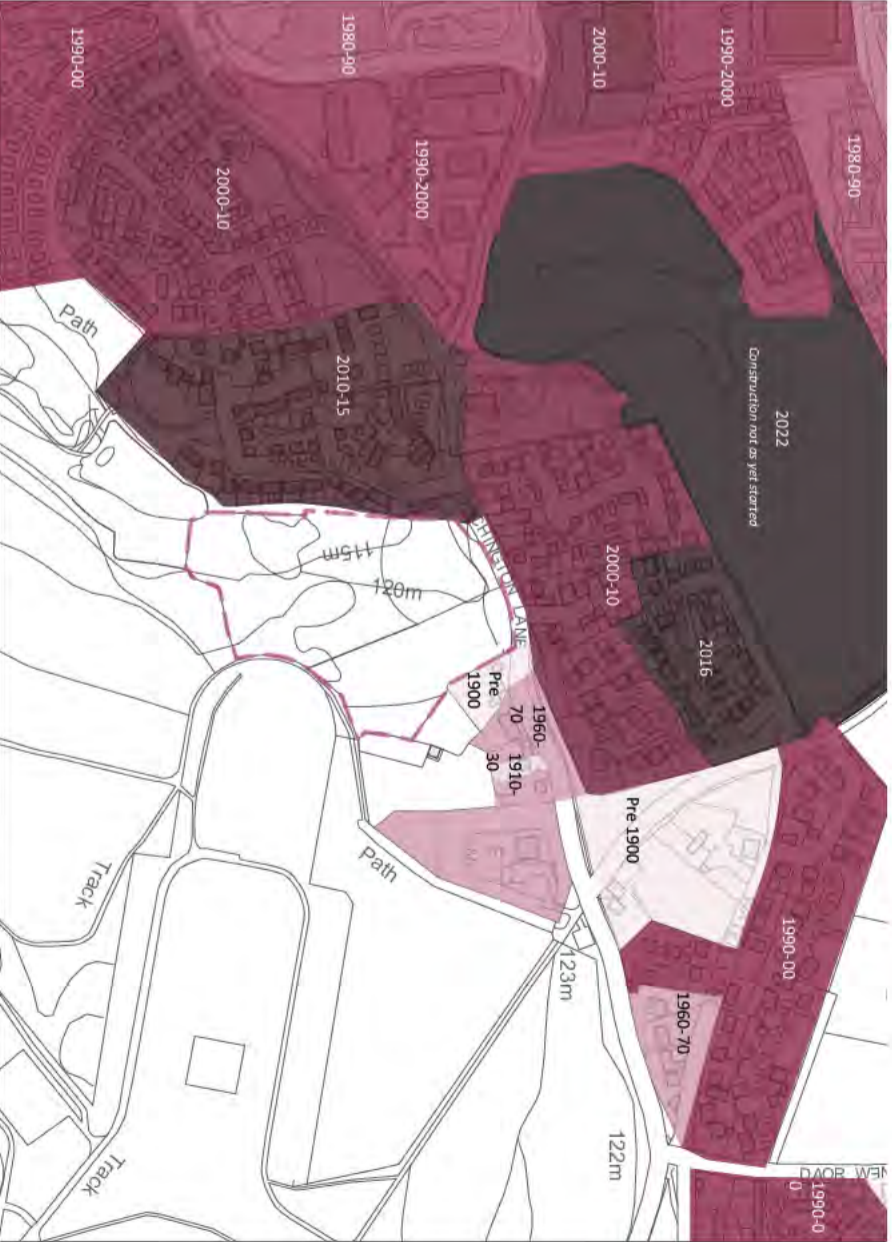
2.2 Historic Development

Historically, Greenham was an outlying 'hamlet' to the south-east of Newbury and on the edge of Greenham Common.

The area of Greenham was largely developed from the mid-1970s onwards. Prior to this time Greenham comprised large one-off dwellings growing in the form of ribbon development primarily along Pinchington Lane.

The distinct areas of Greenham came about during the 1970s as housing estates were developed extending the south-east edge of the Newbury urban area down to the north of the retail park.

From the late 1990s this southern area of Greenham began to see housing development as Pinchington Lane was upgraded. This also allowed for and was driven by the development of the commercial and retail parks situated to the west of the site.



Development over time Ordnance Survey, © Crown Copyright 2022. All rights reserved. Licence number 100022432

The surrounding residential development, which grew from the late 2000s onwards, situated to the west and north of the Site, is of a typical suburban vernacular. This included some development with the northern part of the Registered Park and Garden, including the housing development known as Capability Way. The site of the former landfill situated between Haysoms Drive and Equine Way was granted permission in 2018 for 157 houses (17/01096/OUTMAJ) and construction is due to commence later this year.

The Newbury Retail Park and Newbury Motor Park developments to the west of the site are of a typical retail outlet vernacular and were built in the 1990s and early 2000s.

2.3 Historic Context

The site is situated at the far north-eastern corner of the Sandlesford Priory Estate, which is now designated as Registered Park and Garden. The site and estate was part of a Capability Brown landscape which was developed and designed around 1782. Brown looked to create a parkland setting for the Priory. At least one pond, known as Brown's Pond, was built by enlarging an existing undammed stream. A series of similar sculpted ponds were developed along the stream, the final one of which sits at the south-western boundary of the Site. Whether these other ponds were designed by Brown is unclear, however it is clear that they formed an integral part of the historic parkland setting. Similarly, driveways were designed and constructed through the parkland setting that travelled from the Priory, through the Site and culminated at Pinchington Lodge to the north-east of the Site.

To the east of the Site sits Greenham Common. This area has evidence of a history of human habitation dating back to the stone age. The Common was historically always heathland though was notably transformed during the mid 20th century to become an RAF air field and then US Airforce airbase, synonymous with the nuclear protests during the 1980s. Since that time though it has become a public common and is registered Common Land.



1842 OS Map with Site boundary

3. Suitability Assessment

3.1 Social Context

The Site is highly accessible with a wide variety of shops, educational establishments, restaurants, leisure facilities, and amenities within close proximity. These include:

- Greenham and Crookham Common
- Newbury Retail Park
- Newbury Motor Park
- Newbury College
- Busy Bees Nursery
- Two Watermills Pub
- Highwood Copse Primary School
- Falkland Veterinary Clinic
- Tesco Extra
- The Willows Primary School
- Falkland Doctors Surgery
- Wash Common Pharmacy
- St Gabriel's School and Sandleford Nursery
- David Lloyd Leisure Centre
- St Johns Stores and Post Office
- Eastfield House Surgery
- St Bartholomew's School
- Newbury Railway Station

The Site is therefore highly accessible and very well serviced. There are additional further shops and facilities in the centre of Newbury approximately 2.5km away which can be conveniently accessed by bus.

There are numerous employment opportunities in the vicinity of the Site including: Newbury Retail Park; Greenham Business Park; within Newbury itself and; in the wider West Berkshire area. All of these can be accessed conveniently from the Site including via public transport.

The Site is very well served by buses along Pinchington Lane. There are bus stops directly next to the site. These stops are served by the following buses:

- No. 2/2a – Pigeons Farm to Newbury Wharf (hourly)

- No. 8 – Greenham Tesco to Newbury Wharf (hourly)
- No. 9b/9c – Newbury Racecourse to Newbury Wharf (hourly)
- No. 103 – Greenham Business Park to Newbury Wharf (hourly)

Newbury Railway Station is 1.5 miles away and can be accessed from the Site via the No. 8 bus. The trains are operated by Great Western Railway and run between London and the West Country.



Local Facilities Imagery © 2022 Google

- | | | | |
|--------------------|------------------------|-------------------|-----------------|
| Site Boundary | Leisure Facilities | Supermarket | Railway Station |
| Medical Facilities | Educational Facilities | Public Open Space | Business Park |
| Allotments | Retail | | |

3.2 Housing Land Assessment

The Site was previously identified and assessed under the Strategic Housing Land Availability Assessment (SHLAA), site reference NEW057.

The SHLAA concluded that it was “potentially developable” in the medium term.

The Site is also included within the HELAA; site reference GRE1. The HELAA Assessment for site GRE1 is for a 4 hectare site and it suggests that it may be appropriate to develop 75% of the site/3 hectares.

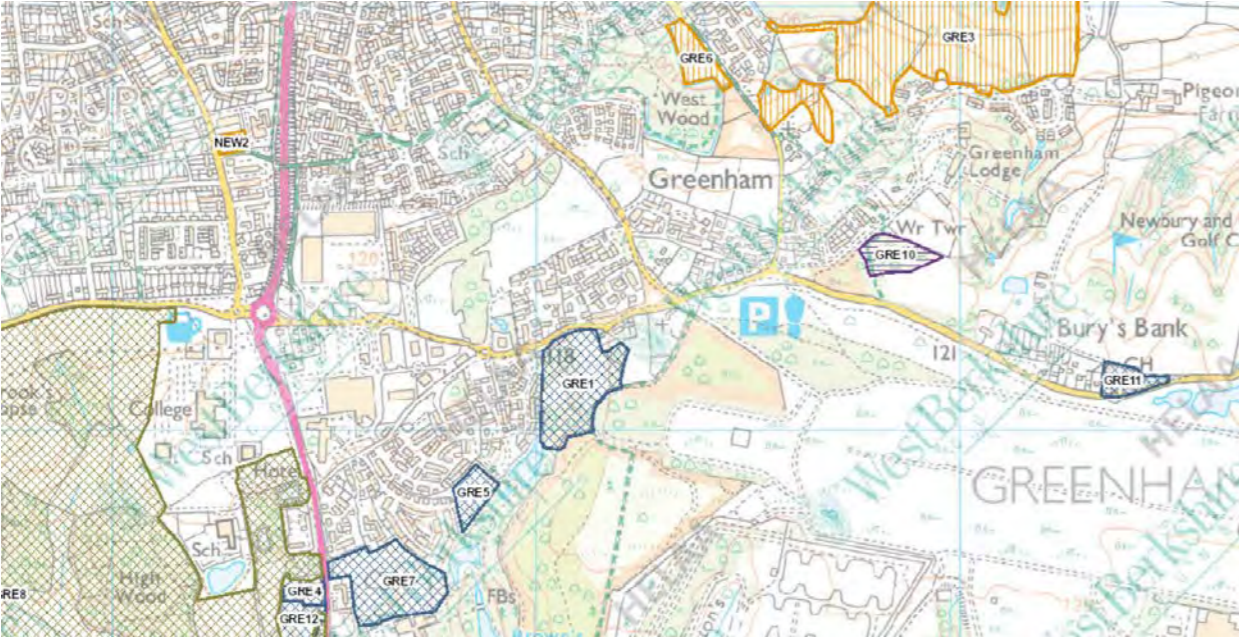
The HELAA Assessment notes site specific issues which could affect capacity as:

- Surface water flood flow route through part of the site.
- Highwater groundwater levels.

- Site of Specific Interest adjoins the site.
- TPOs.

The HELAA Assessment suggests a density of 35dph and an estimated development potential of up to 105 dwellings noting that known issues exist which may reduce this number.

Overall, the current HELAA concludes that the site is unlikely to be suitable for development due solely to the heritage context (the Registered Park and Garden). However, in preparing this vision for the site, heritage advice has been taken and an opportunity identified to allow some development while also restoring part of the historic interest which has been lost over time. In which case, it is considered that this site warrants more detailed consideration, which is consistent with the earlier conclusions in the SHLAA.



West Berkshire HELAA Plan

3.3 Density Pattern Book

The vision for the Site has been developed with reference to the West Berkshire Density Pattern Book (September 2019), which sets out density guidance based on location.

For the Site it is relevant to look at the guidance for sites in Large Town Suburban areas. The recommendation for these sites is around 35 dwellings per hectare (dph) and the pattern book also advises that around 75% of the Site should be developed.

3.4 Planning Context

The Site is located entirely within the administrative boundary of West Berkshire Council.

There is no relevant planning history.

The Development Plan for West Berkshire Council currently consists of:

- Core Strategy 2006-2026 (adopted July 2012);
- Housing Site Allocation Development Plan Document (HSADPD) 2006-2026 (adopted May 2017); and
- Saved policies of the West Berkshire District Local Plan 1991-2006.

The Core Strategy sets out that Newbury is at the top of the District’s settlement hierarchy as it provides a wide range of services and the Core Strategy confirms that it should be the focus for the majority of development.

3.5 West Berkshire Local Plan Review to 2039

According to the Council’s latest Local Development Scheme (LDS) June 2022, it is anticipated that the new Local Plan will be adopted September 2024. The LDS timetable has been updated to take into account changes to the NPPF in 2021, updates from the Environment Agency on flooding, and recent advice from Natural England on nutrient neutrality.

The Council published an “Emerging Draft” document for consultation in December 2020. This made provision for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum. The document makes clear that the target figure of 575 dwellings per annum does not constitute a ceiling or cap to development.

4. Site Analysis

4.1 Site Context

The Site itself is 3.66ha in area. It is characterised by having two distinct halves to it. To the east is an area of open paddocks used for animal grazing. This is largely flat with one large low quality tree towards the south of the field. The western half of the site is an area of, largely self-seeded, woodland. Some distinct areas of planting remain from the historic Capability Brown landscape however most of the parkland setting has been lost through the self-seeding of new trees in the intervening years. This western area of the Site slopes down significantly towards a stream which runs north-south on the western edge of the Site.

At the south, the stream connects into the end of one of the sculpted ponds remaining from the historic Brown landscape. However the significance and visibility of this pond has been significantly impacted due to the housing developments to the west of the Site and the uncontrolled growth of trees within its boundaries.

To the west of the Site sits an attractively designed housing development (Capability Way), which was originally part of the Registered Park and Garden. At the time of the application it was a civic amenity site and following its approval was built out around 10 years ago. This sits on a bank at a significantly higher level than the stream running down the western edge of the Site.

To the east of the Site is Pinchington Lodge, a residential property, with land that extends to the south abutting the eastern edge of the site. This

property historically sat at the culmination of the driveways through the historic parkland. Whilst having been extended significantly and altered over the years, a property has sat here for around 200 years.

Along Pinchington Lane to the east of Pinchington Lodge are similar one-off houses that were largely built between 1910 and 1970 as well as the Church of Latter Day Saints who have a building on the junction with Greenham Road and Burys Bank Road.

Along the eastern and southern boundaries of the Site are heavy banks of mature woodland, which abut Greenham Common. In the south there is an existing gated access which connects onto the Public Right of Way that runs within the Common.

At the north of the Site is a bank of trees and woodland that abuts Pinchington Lane. Some of this is scrubby and immature but much of it provides good screening between the site and Pinchington Lane.

An existing farm gate, at the apex of the bend on Pinchington Lane, provides the existing vehicular access onto the Site.

The Site is within Flood Zone 1 and therefore is not at risk of flooding from rivers and the sea. There is, however, a stream that runs through the Site on the north-west boundary, which drains to the nearby pond, and noting the local topography, there is likely to be a limited risk of surface water flooding in the main part of the Site.



Open paddock in eastern half of the Site



Sculpted pond in south west of the Site



Large low quality tree in eastern half of the Site



Pinchington Lodge Image © Google



Self-seeded woodland in western half of the Site



Dwellings on Pinchington Lane Image © Google



Stream on western edge of the Site with existing adjacent development at higher level



Capability Way development to the west of the Site Image © Google

4.2 Access and Highways

An existing farm gate, at the apex of the bend on Pinchington Lane, provides the existing vehicular access onto the Site. The access has been assessed by Rappor Consultants Ltd and with some vegetation clearance to improve sightlines this can be modified to provide suitable access for a residential development.

As noted above, the Site is well connected to the existing settlement of Newbury and represents a sustainable location for growth. It is within close proximity of local facilities and services and accessible via a variety of modes, including by foot and bus.

4.3 Ecology / Biodiversity

A Preliminary Ecological Appraisal (PEA) of the Site has been carried out by Pro Vision and the advice and recommendations in the PEA have been considered through the design process. Further surveys are required, to fully ascertain the Site’s ecological value, and to inform mitigation works.

Suitable mitigation can be provided for the adjacent Greenham and Crookham Commons Site of Special Scientific Interest (SSSI) and the Greenham and Crookham Commons Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) Reserve.

The PEA provides broad recommendations for the achievement of Biodiversity Net Gain, and various options for further ecological enhancement on the Site.

4.4 Heritage

A Heritage Assessment has been produced by CgMS. The Site has low potential to impact on below ground archaeology dating to before the creation of the Sandleford Parkland.

There are no listed buildings within a reasonable distance of the Site and no Conservation Areas close by.

The proposed development lies in the eastern sector of Sandleford Park (RPG).

The valley and park of the former Sandleford Priory have been managed as parkland at least since the early 18th century when Rocque recorded formal planting near the principal house. At the end of the 18th century Elizabeth Montague undertook considerable improvements to both the house and parkland, the latter based on the plans produced by Lancelot ‘Capability’ Brown in 1781, two years before his death.

The Heritage Assessment sets out that the impact of development on the RPG will be due to the reduction

in the parkland area, its transformation from parkland to residential and its visual presence when seen from outside the parkland and when viewed from within the park area.

The Heritage Assessment sets out that mitigation to ensure the impact of the development is as low as possible may be achieved by employing the following design principles:

- Seeking to restore elements of the historic parkland by the inclusion of elements such as the historic driveways within the many masterplan proposals.
- Limiting the impact of new housing on the northern boundary of the park by landscaping.
- Maintaining the present wooded character of the area.
- Ensuring that new development is appropriate in terms of scale and design in the context of the existing settlement form, pattern and character.

The Heritage Assessment concludes that the proposed development would result in less than substantial harm to the RPG.

This harm would need to be balanced against the public benefits, including delivering new homes in an accessible location.

In quantifying the harm, it is important to consider that there is already a precedent for development within the historic park, including the 85 houses on Capability Way; the 122 houses at Land South of Deadmans Way; the 65 unit mobile home park at Sandleford Lodge; and the 28 units on Deadmans Lane. All of these are within the RPG



Site access with boundary screening Image © Google



Gated access into Greenham Common



Public footpath on Greenham common adjacent to the Site’s boundary

4.6 Constraints and Opportunities

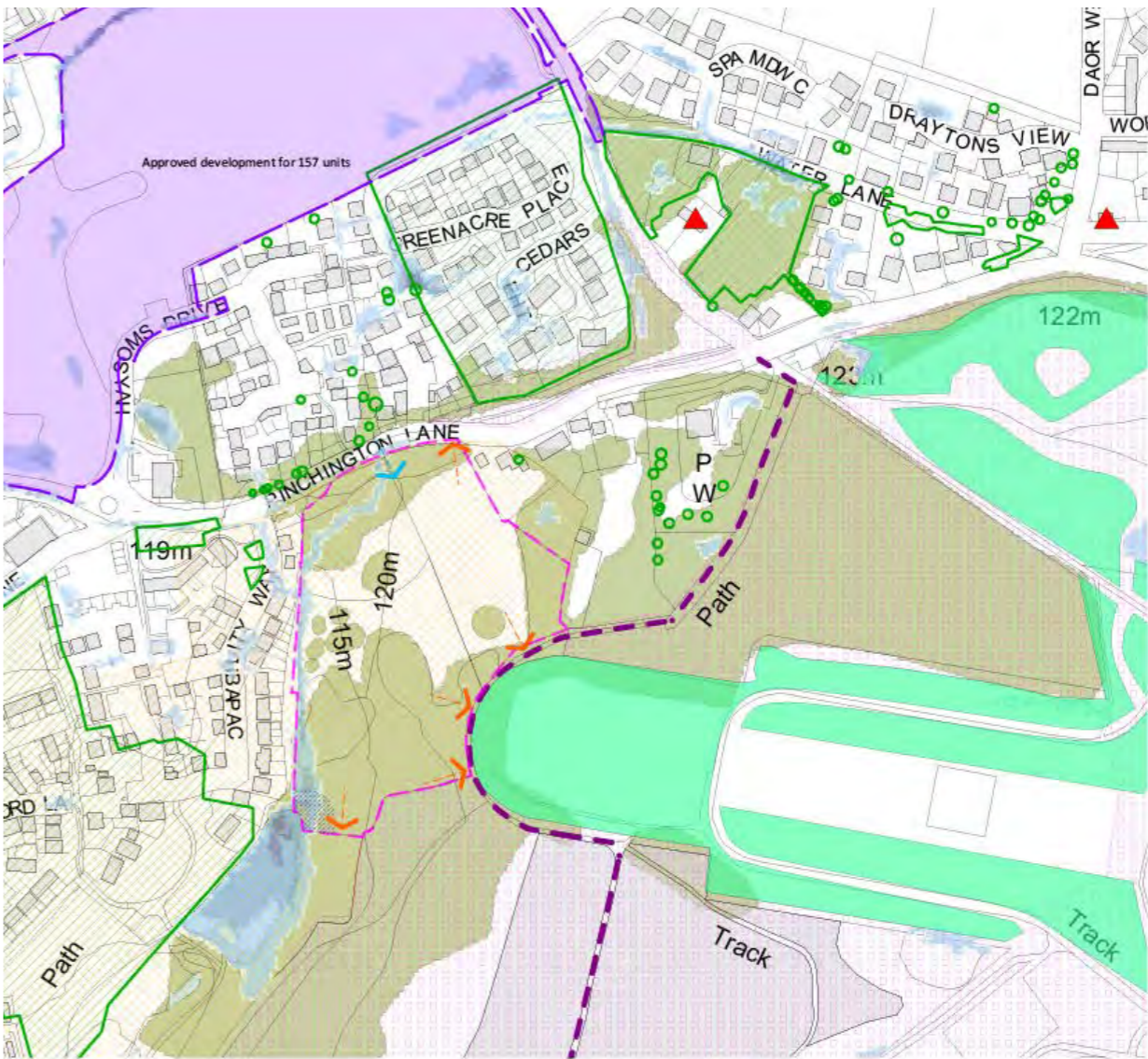
Following an analysis of the context of the site, the constraints and opportunities have been collated and analysed.

Constraints:

- Loss of part of the historic parkland resulting in less than substantial harm
- Limited risk of surface water flooding in the western and northern areas from the stream that runs through the site.
- Existing woodland area in the south-west limiting the areas for residential development.
- Site access on the apex of a bend requiring some vegetation clearance to provide suitable visibility splays.
- Potential for overlooking into the adjacent Pinchington Lodge to the east of the Site.
- Evidence of existing ecological habitats on Site that will require mitigation. Further surveys are being undertaken.
- Steep banks in the west of the Site.

Opportunities:

- Redevelopment of the area around the pond at the south of the Site in order to help restore some of its historic significance.
- Restore and reference some of the historic driveway routes that ran through the historic garden landscape.
- Develop housing to meet a locally identified need in a sustainable location close to local facilities and amenities.
- Provide an important affordable housing provision on-site.
- Significant areas of level open land, which are at no risk of surface water flooding, providing good opportunity for residential development.
- Significant existing surrounding planting providing good screening from Pinchington Lane and to the Common.
- Good transport links with a direct existing vehicular connection onto Pinchington Lane.
- Existing bus stops on Pinchington Lane immediately adjacent to the Site.
- Footpath access directly into Greenham Common.
- Excellent links to local shops including those within the nearby retail parks.
- Excellent employment opportunities in the local vicinity.
- Enhance and improve the biodiversity within the site.



Constraints and Opportunities Plan



5. The Vision

5.1 Design Concept

The Site is well located to provide opportunity for residential development that will sit in keeping with surrounding development. It also has the opportunity to help restore and reference some of the historic context of the site.

The site has a significant historic context with its links to Sandleford Priory and the historic Capability Brown landscape, which has been lost over time. The ponds which formed a central part of the parkland landscape are largely hidden, overgrown and inaccessible. The open parkland landscape with its distinct and well-designed areas of planting with routes and paths that wend through them, have also been lost over time, due to surrounding residential development and the untended growth of trees on the site.

Whilst most of this landscape has been eroded, there is a unique opportunity here to be able to reference and provide some links to the historic context of the site within any proposed development. Historically two significant driveways ran through the site connecting the Priory to Pinchington Lodge. Creating a structure of development that follow these lines therefore provides an opportunity to reference these routes. Whilst, due to the developments to the west, these routes cannot be fully reinstated, they can be referred to and used as a structure around which development is set. These routes will be a mixture of roads and footpaths and can look to provide an additional pedestrian connection onto Pinchington Lane. There is an opportunity to create a woodland path through to the pond at the south of the site. Whilst much of the planting in this area is not structured, it still is important, ecologically and environmentally, and therefore it would seem inappropriate to remove significant amounts of planting in order to restore one small section of an

historic parkland. A proposed footpath connection can therefore trace the historic driveway and bring public access to the edge of the sculpted pond. Clearing some of the wooded area around the pond however, could potentially provide a beautiful setting with perhaps a boardwalk and viewing area in order that the pond can once again be enjoyed and experienced by the public and its relationship to the historic parkland could be better appreciated.

Connections into the adjacent Common are key in terms of ensuring permeability through the site and in order that residents can have access to enjoy this amenity.

The main area for residential development would be kept to the eastern side of the site which is largely open, flat and has limited tree cover that would restrict development.

The wooded area at the rear of the site (southern boundary) would largely remain, including a suitable buffer from development, and provide a natural transition to the Common.

Access to the site will be via the existing vehicular access onto Pinchington Lane, which will be upgraded and made suitable. A preliminary assessment by Rappor Consultants Ltd has looked at this access and confirmed its suitability in principle. Further detailed assessment and a detailed junction scheme will be needed in due course.



Design Concept

5.2 Proposed Design

The illustrative proposals present a scheme which allows for around 60 units including 1 and 2 bed flats and 2, 3, 4 and 5 bed houses. Affordable housing could be distributed in small groups around the Site.

The houses will likely all be 2 storey and sit on the east side of the Site, which is flat and largely unconstrained. As the land starts to fall away to the west two blocks of flats are proposed. These could be 3 storeys, however given the topography they will not be any more prominent in the Site than the rest of the development. This area is also well screened, being in the middle of the Site, by existing retained vegetation.

The proposals use the structural framing of roads and footpaths, as set out in the Design Concept, following the historic routes of the Capability Brown designed landscape. Capability Brown landscapes typically feature a woodland belt on the perimeter of the parkland garden. The woodland belts were intended to make the parkland feel more private. The proposed scheme therefore seeks to retain the existing woodland belt in the south-west of the Site. Whilst this specific area of the woodland was not thought to be part of the historic landscape, its retention maintains this historic character as well as providing biodiversity and amenity benefits.

The proposals include a mixture of terraced, semi-detached and detached dwellings fronting onto these roads, with generous rear gardens that face out of the site. Gardens around the edge of the site generally back onto existing landscape and this planting will be reinforced in order to protect the setting and amenity of the Common and the adjoining existing dwelling, Pinchington Lodge.

Existing landscaping on Site has largely been retained and incorporated into a landscape master plan, with a priority on maintaining aspects of the historic landscape that still remains on site. Some of the scrub and undergrowth around the Site will be cleared in order to restore elements of the concept of a parkland setting and to enable footpath links through the trees.

Areas of public open space and play areas will be provided on Site, but also links will be made into the wider areas of significant public open space within the Common.



6. Conclusion

CALA Homes are promoting a vision for the development of around 60 new homes on a site to the south of Pinchington Lane in Newbury.

The scheme sits within the remnants of the historic Capability Brown designed landscape that was a part of the Priory and is adjacent to Greenham Common.

The proposed vision is to sensitively develop the Site in order to help reference and reassert its historic significance. This will be done whilst providing high quality housing that will seek to meet the needs of local people and provide much needed affordable housing in the area.

The Site is in an excellent location, with good existing transport links. The Site has excellent access to local facilities, amenities and employment opportunities.

The vision is for a logical next phase of residential development on Pinchington Lane, following on from the Capability Way scheme.



Vision Document July 2022

Project No. 51206

Prepared on behalf of CALA Homes Ltd



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Appendix B — Land south of Pinchington Lane, Greenham Common, West Berkshire: Heritage Assessment (RPS Group, 21 September 2022)

LAND SOUTH OF PINCHINGTON LANE, GREENHAM COMMON, WEST BERKSHIRE

Heritage Assessment



JAC 28267
Land South of Pinchington
Lane
3
21st Sept 2022

REPORT

Quality Management

Version	Status	Authored by	Reviewed by	Approved by	Review date
1	Draft	MD			12/8/22
2	Final	MD	RD ProVision		26/8/22
3	Final	MD	RD ProVision		21/9/22

Heritage

HER Search 13/7/22

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West Berks Council

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EXECUTIVE SUMMARY

This heritage assessment has followed the principles advocated by the NPPF and Historic England. This report has assessed the potential impact of the proposed residential development of land off Pinchington Lane, Greenham, on archaeological deposits and the designated heritage assets.

The assessment is based on documentary, map search, and a site inspection in May 2018 and 2022, which recorded the current condition of the proposed development site and surrounding heritage assets.

The landscape of Pinchington Lane, identified as a reasonable study area, extends to 1km from the proposed development site and includes heritage assets of national importance, dating, principally, from the late medieval and Modern periods. These reflect the changing nature of the historic landscape and recent urban development. In the early 3rd millennium the site remains largely overgrown with areas of grazing north of the school grounds.

With respect to below ground archaeology the nature of the evidence from the Historic Environment Search and the historic evidence from archive and published sources, suggest that it is unlikely that the site will retain any important archaeological evidence of earlier activity. The exceptions are the two routes of the former driveway from Pinchington Lodge to Sandlesford Priory and Sandlesford Farm, dating to the late 18th and 19th centuries.

The development falls within Sandlesford priory (RPG) and the report has assessed the potential impact on the character of the parkland area. With respect to the setting of heritage assets only one asset, Sandlesford Priory (now St Gabriel's School), might be considered at risk due to the development. However the development area and the Priory are not intervisible and impact on this listed building has been considered as part of the assessment of impact on the registered park and garden of Sandlesford Priory.

In conclusion the site of the proposed development has low potential to impact on below ground archaeology dating to before the creation of the Sandlesford Parkland. However it is likely that as a 'greenfield' site further evaluation to assess this potential by the conventional methods of geophysical survey and trial trenching are likely to be requested by the local authority.

With respect to the impact of development on the RPG this will be harmful, though less than substantially harmful. Although designated as parkland, the development site is in private ownership, has no public access or rights of way through it and has very limited visibility from the public realm given the substantial tree belts on its northern and southern boundaries. The impact of development will be due to the reduction in the parkland area of the RPG, its transformation from parkland to residential and its visual presence when seen from outside the parkland (RPG) and when viewed from within the park area (RPG).

Mitigation to ensure the impact of the development is as low as possible may be achieved by employing the following design principles:

- Enhancing the parkland by the inclusion of elements such as the historic driveways in the masterplan proposals (NPPF para 126; Core Strategy CS19).
- Limiting the impact of new housing on the northern boundary of the park by landscaping (Core Strategy CS19).
- Maintaining the present wooded character of the area (Core Strategy CS19).

- Ensuring that new development is appropriate in terms of scale and design in the context of the existing settlement form, pattern and character (Core Strategy CS19).

The proposed scheme (see Appendix B) as currently illustrated has sought to incorporate these design principles in order to mitigate the impact of the proposed development. The scheme has specifically sought to: retain the historic driveways; retain and enhance the planting on the northern boundary; maintained the wooded area in the south west of the site and around the southern and east boundaries and to present a development that is appropriate in the context of the surrounding development and character of the area. The objective of applying these principles is to ensure that the potential impact of development will be less than substantially harmful for the purposes of the NPPF.

Contents

EXECUTIVE SUMMARY	I
1 INTRODUCTION AND SCOPE OF STUDY	1
Scope of Study	1
The Proposed Development.....	1
2 PLANNING BACKGROUND AND DEVELOPMENT PLAN FRAMEWORK.....	2
National Legislation	2
National Planning Policy.....	2
Local Planning Policy	3
Conclusion.....	4
3 HERITAGE ASSETS.....	5
Introduction	5
Archaeological Data	6
Built Heritage Assets	11
4 IMPACT ASSESSMENT	13
Proposed Development and Design Iteration	13
Impacts on Below Ground Archaeology.....	14
Impact on the Character of Heritage Assets	15
5 SUMMARY AND CONCLUSIONS	19
Summary	19

Appendix A HER Data including Figures

Appendix B Indicative Development Plan

Figures

<i>Fig 1</i>	<i>The location of the proposed development site</i>
<i>Fig 2</i>	<i>The proposed development site in 1781</i>
<i>Fig 3</i>	<i>The proposed development site in 1808</i>
<i>Fig 4</i>	<i>The proposed development site in 1871</i>
<i>Fig 5</i>	<i>The proposed development site in 1873</i>
<i>Fig 6</i>	<i>The proposed development site in 1898</i>
<i>Fig 7</i>	<i>The proposed development site in 1900</i>
<i>Fig 8</i>	<i>The proposed development site in 1932</i>
<i>Fig 9</i>	<i>The proposed development site in 1938</i>
<i>Fig 10</i>	<i>The proposed development site in 1961</i>
<i>Fig 11</i>	<i>The proposed development site – aerial view 2017 (Aerial photograph©Google Earth)</i>
<i>Fig 12</i>	<i>The proposed development site</i>
<i>Fig 13</i>	<i>The development site area</i>

1 INTRODUCTION AND SCOPE OF STUDY

- 1.1 This Heritage Assessment has been prepared by Michael Dawson of RPS Group on behalf of Cala Homes Ltd.
- 1.2 The subject of this assessment is the proposed residential development of land off Pinchington Lane, Greenham, a discrete area comprising part grazing land and part woodland to the west of Pinchington Lodge.

Scope of Study

- 1.3 The objectives of the report can be summarised as follows:
- To assess the potential impact of the proposed development on the significance of heritage assets at the site and
 - To assess the potential impact of the proposed development on the significance of heritage assets due to development within their settings.
- 1.4 This Heritage Assessment combines a Statement of Significance for the registered Park and Garden (RPG) at Sandleford Priory and an assessment of the potential impact on heritage assets both directly and due to development within their settings. Evidence has been examined at archive sources including the Berkshire Historic Environment Record, Berkshire Archives and Records Service, together with records of previous investigations within the area, the National Heritage List, published and other material. The evidence from these sources has been interpreted to determine the pattern of historic development of the landscape and has been used to establish the baseline from which to assess the visual and perceived impact of the proposed development.
- 1.5 The area within which the proposed development could be seen was assessed by Michael Dawson during a field visit in May 2018 and in 2022. The local built environment, landscape, topography and vegetation were noted in relation to heritage assets, in an assessment intended to gauge the potential impact of the proposed development on the landscape and heritage assets which make up the historic environment.

The Proposed Development

- 1.6 This Heritage Statement is submitted on behalf of Cala Homes in respect of the proposal for residential development on the site shown in red on the accompanying figures. The proposed site location is shown at Figure 1 and is centered on NGR SU 48103 65118.
- 1.7 The illustrative proposals (Appendix B) present a scheme for around 60 units, which include houses and two discrete blocks of flats. The majority of the development is located in the north eastern section of the proposed development site with the wooded area to the south west retained. The majority of the historic and existing planting has been retained with areas of new planting included in the design proposals. The pattern of development looks to include reference to the two historic driveways through the layout of the roads and associated footpaths. The scheme also seeks to work with the context of the site ensuring that higher areas of development are located lower down in the landscape, ensuring that appropriate screening is provided to the northern and southern boundaries to the public realm and ensuring that the density and pattern of development is sensitive to and fits in with the character and form of surrounding development.

2 PLANNING BACKGROUND AND DEVELOPMENT PLAN FRAMEWORK

- 2.1 National legislation regarding archaeology, including scheduled monuments, is contained in the Ancient Monuments and Archaeological Areas Act 1979, amended by the National Heritage Act 1983 and 2002, and updated in April 2014.
- 2.2 In March 2012, the government published the National Planning Policy Framework (NPPF), and it was last updated in July 2021. The NPPF is supported by the National Planning Practice Guidance (NPPG), which was published online 6th March 2014, with the guidance on Conserving and Enhancing the Historic Environment last updated 23rd July 2019 (<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>).
- 2.3 The NPPF and NPPG are additionally supported by three Good Practice Advice (GPA) documents published by Historic England: GPA 1: *The Historic Environment in Local Plans*; GPA 2: *Managing Significance in Decision-Taking in the Historic Environment* (both published March 2015). The second edition of GPA3: *The Setting of Heritage Assets* was published in December 2017.

National Legislation

- 2.4 Legislation regarding buildings and areas of special architectural or historic interest is contained in the Planning (Listed buildings and Conservation Areas) Act 1990 (the 1990 Act).
- 2.5 Section 66 of the 1990 Act requires that:

(1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

National Planning Policy

- 2.6 Section 16 of the NPPF, entitled '*Conserving and enhancing the historic environment*' provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:
- Delivery of sustainable development;
 - Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
 - Conservation of England's heritage assets in a manner appropriate to their significance; and
 - Recognition that heritage makes to our knowledge and understanding of the past.
- 2.7 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 194 states that planning decisions should be based on the significance of the heritage asset and that level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset.
- 2.8 *Heritage Assets* are defined in Annex 2 of the NPPF as: a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. They include designated heritage assets (as defined in the NPPF) and assets identified by the local planning authority during the process of decision-making or through the plan-making process.

- 2.9 Annex 2 also defines *Archaeological Interest* as a heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point.
- 2.10 A *Nationally Important Designated Heritage Asset* comprises a: World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.
- 2.11 *Significance* is defined as: The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 2.12 *Setting* is defined as: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- 2.13 In short, government policy provides a framework which:
- Protects nationally important designated Heritage Assets;
 - Protects the settings of such designations;
 - In appropriate circumstances seeks adequate information (from desk-based assessment and field evaluation where necessary) to enable informed decisions;
 - Provides for the excavation and investigation of sites not significant enough to merit *in-situ* preservation.
- 2.14 The NPPG reiterates that the conservation of heritage assets in a manner appropriate to their significance is a core planning principle, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation. Importantly, the guidance states that if complete, or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset's significance and make the interpretation publicly available. Key elements of the guidance relate to assessing harm. An important consideration should be whether the proposed works adversely affect a key element of the heritage asset's special architectural or historic interest. Additionally, it is the degree of harm, rather than the scale of development, that is to be assessed. The level of 'substantial harm' is considered to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF. Importantly, harm may arise from works to the asset or from development within its setting. Setting is defined as the surroundings in which an asset is experienced and may be more extensive than the curtilage. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 2.15 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

Local Planning Policy

- 2.16 The site is located within West Berkshire The Development Plan for West Berkshire Council currently consists of:
- Core Strategy 2006-2026 (adopted July 2012);
 - Housing Site Allocation Development Plan Document (HSADPD) 2006-2026 (adopted May 2017); and

- Saved policies of the West Berkshire District Local Plan 1991-2006.

2.17 The Core Strategy sets out that Newbury is at the top of the District's settlement hierarchy as it provides a wide range of services and the Core Strategy confirms that it should be the focus for the majority of development. The following policy is relevant to the proposal:

West Berkshire Core Strategy Adopted July 2012

2.18 The adopted Core Strategy 2012 includes the following policy for the historic Environment:

Policy CS 19 Historic Environment and Landscape Character

In order to ensure that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced, the natural, cultural, and functional components of its character will be considered as a whole. In adopting this holistic approach, particular regard will be given to:

a) The sensitivity of the area to change.

b) Ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character.

c) The conservation and, where appropriate, enhancement of heritage assets and their settings (including those designations identified in Box 1).

d) Accessibility to and participation in the historic environment by the local community.

Proposals for development should be informed by and respond to:

a) The distinctive character areas and key characteristics identified in relevant landscape character assessments including Historic Landscape Characterisation for West Berkshire and Historic Environment Character Zoning for West Berkshire.

b) Features identified in various settlement character studies including Quality Design – West Berkshire Supplementary Planning Document, the Newbury Historic Character Study, Conservation Area Appraisals and community planning documents which have been adopted by the Council such as Parish Plans and Town and Village Design Statements.

c) The nature of and the potential for heritage assets identified through the Historic Environment Record for West Berkshire and the extent of their significance.

Conclusion

2.19 In line with relevant planning policy and guidance, this Heritage Assessment seeks to clarify the site's archaeological potential and the likely significance of that potential and the need or otherwise for additional mitigation measures.

3 HERITAGE ASSETS

Introduction

- 3.1 This section describes the significance of the heritage assets potentially affected by the proposed development. It identifies both those heritage assets where development may have an affect due to development within their settings and where development will have a direct impact on their heritage significance.¹
- 3.2 Existing national policy guidance for the historic environment (the NPPF as referenced in section 2) enshrines the concept of the ‘significance’ of heritage assets. Significance as defined in the NPPF centres on the value of an archaeological or historic asset for its ‘heritage interest’ and for the contribution setting makes to significance for this or future generations.
- 3.3 At Pinchington Lodge there are three classes of heritage asset to be considered: below ground archaeology, the Registered Park and Garden within which the proposed residential development will be located and where the potential impact is directly upon the asset; and the listed buildings and structures which make up the built heritage of Sandleford Priory.

Geology and Topography

- 3.4 The proposed development are lies in area where the British Geological Survey indicates that the solid geology comprises the London Clay Formation. This is a Sedimentary Bedrock formed approximately 48 to 56 million years ago in the Palaeogene Period when the local environment was dominated by shallow seas. The deposits are shallow-marine in origin. They are detrital, ranging from coarse- to fine-grained forming interbedded sequences. The drift or superficial geology comprises Silchester Gravel Member. These are deposits formed up to 2 million years ago in the Quaternary Period when the local environment was dominated by rivers. These sedimentary deposits are fluvial in origin. They are detrital, ranging from coarse to fine-grained and form beds and lenses of deposits reflecting the channels, floodplains and levees of a river.
- 3.5 The development site lies in an area characterised by the Thames Basins Heaths NCA (129):

The Thames Basin Heaths National Character Area (NCA) stretches westwards from Weybridge in Surrey to the countryside around Newbury in Berkshire. The London greenbelt incorporates countryside around Chobham and the rivers Wey and Mole. West of the greenbelt, 20th-century development has given rise to large conurbations including Camberley and the ‘new town’ of Bracknell. Among these conurbations, gardens amount to a significant area of greenspace, with rhododendron being a particular feature, and a major road network incorporates the M25 and M3. This densely settled area can be a significant source of pollution and rapid run-off. Further from London, in the west, the settlement pattern is a mix of dispersed hamlets, farmsteads and houses interspersed with villages, many of medieval origin. Vestiges of the historic royal hunting forests of Bagshot, Eversley, Pamber and Windsor comprise parkland, ancient woodland, and small to medium-sized fields of semi-natural grassland. Features include ancient hedgerows and veteran trees, and there are parklands at The Vyne and Highclere Castle. Woodland accounts for a quarter of this NCA, reflecting the predominance of low-grade agricultural land. Only 20 per cent of this woodland is on ancient woodland sites, with the majority of it having grown up or been planted on former heathland – much of which is or was common land. Conifers and rhododendron are particularly distinctive in the east of the NCA. In this heavily wooded landscape, there are significant timber and biomass opportunities. Common land is found across the NCA, with the

¹ This section is based on the first three stages of the 4 staged approach outlined by Historic England in 2017.

largest commons found on raised plateaux of Tertiary sands and gravels. On these deposits, farming is largely limited to rough pasture and there are large estates. Non-agricultural land uses are widespread, and include large plantations and military bases including Aldershot. Formal and informal green space is concentrated in the east of the NCA and includes country parks Woodlands and golf courses such as Wentworth. The Kennet and Blackwater valleys are a focus for sand and gravel extraction.

Semi natural habitat is extensive on the plateaux and includes mosaics of wet and dry heathland, woodland and acid grassland. These habitats and bird populations of nightjar, Dartford warbler, and woodlark are of international importance. They are protected by the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) and the Thames Basin Heaths Special Protection Area (SPA) as well as being nationally designated a Site of Special Scientific Interest (SSSI) in the east the close proximity of semi natural habitats to settlements gives rise to recreation and education Opportunities as well as to problems such as fly tipping arson and disturbance.²

Topography

- 3.6 The proposed development area is located to the east of the A34 at the western end of the former RAF Greenham Common on the east bank of a valley on rising ground south of Pinchington Lane. The development area is bounded to the north by Pinchington Lane, to the east by the boundary of the former Greenham Common airfield and to the west by housing.

Timescales used in this report

Prehistoric

Palaeolithic	900,000 -	12,000 BC
Mesolithic	12,000 -	4,000 BC
Neolithic	4,000 -	1,800 BC
Bronze Age	1,800 -	600 BC
Iron Age	600 -	AD 43

Historic

Roman	AD 43 -	410
Saxon/Early Medieval	AD 410 -	1066
Medieval	AD 1066 -	1485
Post Medieval	AD 1486 -	1799
Modern	AD 1800 -	Present

Archaeological Data

- 3.7 A search of the Historic Environment Record was undertaken for archaeological data recorded within 1km of the proposed carpark. The data obtained from the county HER includes 29 'event' records within the search area in Berkshire. These comprise records related to Sandleford Farm

² Extract from <http://publications.naturalengland.org.uk/publication/6667269664931840?category=587130> accessed 12/8/22

(to the west),³ St Gabriel's School (Sandleford Priory), Greenham village and common, Newbury Racecourse as well as development within the parkland (RPG) off Deadman's Lane.⁴ No further evidence from these events was noted within or close to the proposed development area (Figs 2, 3).

- 3.8 No landscape trends were noted in the HER data that suggest the presence of below ground archaeology within the proposed development area prior to the establishment of Sandleford Park (RPG).

Palaeolithic

- 3.9 A Palaeolithic hand axe has been found on Greenham Common (MWB10050) its exact location unrecorded, a second axe (MWB10061) was recovered from near Pigeon's Farm Road, Greenham however no Palaeolithic material is associated with Pinchington Lane.
- 3.10 The presence of Palaeolithic archaeology is notoriously hard to predict. The framework of the Palaeolithic period has been established by Bridgland⁵ and focuses on the river valleys. In simple terms it has been divided into several chronological periods based on technology and climate, from the Cromerian Inter-Glacial of approximately 500,000 years ago to the Late and Final Upper Palaeolithic of the Windemere Interstadial 10,000 years ago.
- 3.11 Brief Palaeolithic assessment based on the topography indicates considerable uncertainty. The topography on which the proposed development is located may have the potential for artefacts deposited with glacial material, and, therefore, in secondary locations, but overall, the proposed development area can be defined as having a very low potential.

Mesolithic, Neolithic, Bronze Age and Iron Age

- 3.12 No evidence of prehistoric period activity has been recorded within the proposed development site. Fieldwalking in the western area of the parkland revealed a low level of artefactual material, but Mesolithic flint is typically recovered from topsoil in the Chilterns area further west. Typically flint of this nature represents the remains of short-stay task specific activity and it is likely there is potential for lithics assemblages of this nature within the proposed development area.
- 3.13 The later prehistoric period is characterised by increasingly sedentary activity. In the Neolithic the principal shift is from hunting and gathering to sedentary farming. The evidence of settlement, though, is sparse in the county although some significant settlements are known. The pattern of flint material generally in the Neolithic and the condition of the proposed development site suggests that there is potential to recover further lithics of this period but that the development site is unlikely to be the location of significant Neolithic archaeology.
- 3.14 The Bronze Age is typically characterised by the proliferation of individual burial sites (barrows) and an increasingly evident settlement pattern. An earthwork bank of possible Bronze Age date (MWB3726) was destroyed during construction of the airbase at Greenham Common, and a cinerary urn was found on Chandos Road, Newbury (MWB10138). The proposed development site is situated in a valley side location which might suggest the potential for features such as

³ Of particular interest is a Conservation Audit by Skilldraw Ltd. 2012. *Conservation Audit in respect of Sandleford Park*. AHC REF 9100 in relation to the parkland owned by directors of Sandleford Farm partnership and Skilldraw Ltd including Nicholas Laing (c. 15%); Delia Norgate, widow of the founder of Trencherwood Homes, John Norgate; and Noel Gibbs. (from WikiVividly accessed 25/5/18)

⁴ HER EWB658 Davies Light Associates. 01/03/2004. Hounsells Land, Deadmans Lane, Newbury - Archaeological Desk-Based Assessment. DLA 979/ARCH/01.

⁵ Howard et al., 2007

'burnt mounds' which are typically found in such locations close to water sources. However, in the absence of evidence there is nothing to suggest that this is the location of significant Bronze Age archaeology.

- 3.15 The later prehistoric period is a time when settlement typically became increasingly complex. In the earliest period the principal shift is from hunting and gathering to sedentary farming. By the 8th century BC communities in England began to use iron, at first in small quantities and it was a period of considerable social change and increasing settlement based on arable and livestock farming. In the Berkshire region Iron Age settlement was typically small scale and agricultural. Settlements often occur at intervals c. 1-1.5km especially on higher ground above the major river valleys, such as the Thames, but in the Berkshire Downs the pattern has yet to be fully unravelled.⁶
- 3.16 No evidence of prehistoric activity, however, has been found within the proposed development site and there is no pattern in the landscape to suggest more than a slight potential survival for evidence of this period.

Roman

- 3.17 Several sherds of Roman pottery were found in Pyle Hill Gravel Pit (MWB12461), at Stroud Green (MWB12469), coins northeast of Greenham Road (MWB14722), the possible remains of a field system at Newbury College (MWB16132) and several finds were made during drainage works on Lloyd Baxendale's estate in 1876 (MWB12466). No evidence of Roman period activity has been found within the development site.
- 3.18 The pattern of settlement during the Roman period tends to favour valley side and ridge top locations. The latter often comprise stock and arable enclosures with dwellings in a linear pattern running along the ridge top and valley slopes, often on southern facing slopes. This suggests continuing clearance of timber and exploitation of the lighter soils for arable agriculture. However, no detailed picture of the settlement pattern in the Greenham region has emerged, though the potential for evidence of more than agricultural activity is slight within the proposed development area.⁷

Anglo-Saxon, Medieval and Early Post-Medieval

- 3.19 In the post-Roman and Anglo-Saxon period the proposed development area lay in land which was to become the parish and township of Sandleford. The history of Sandleford has been published by the Victoria County History and needs no repetition here except to note that the proposed development lies on the northern edge of the small parish where it shares a boundary with Newbury Borough. The proposed development site may originally have been part of the open field system associated with the hamlet which was situated to the south west of the site area.
- 3.20 With the exception of St Mary's chapel (MWB5029), Greenham (MWB5026/7) and the site of Greenham Manor house (unknown) (MWB15831) there are only two entries on the HER for the medieval period. These comprise a hollow way north of Sandleford Place (MWB21392) and fishponds at Sandleford Priory (MWB15769). Neither of these lies within the proposed development area. The proposed development site lay within lands which during the medieval period belonged to Sandleford priory. At Domesday the majority of the parish was included in the manor of 'Ulvritone' but was granted to the Prior and canons of Sandleford by Geoffrey, fourth Count of Perch and Maud his wife when they founded the priory between 1193 and 1202.

⁶ Lambrick 2014, *The later Bronze Age and Iron Age: Resource Assessment*, 128

⁷ Fulford 2014, *The Roman Period: Resources Assessment*, 163

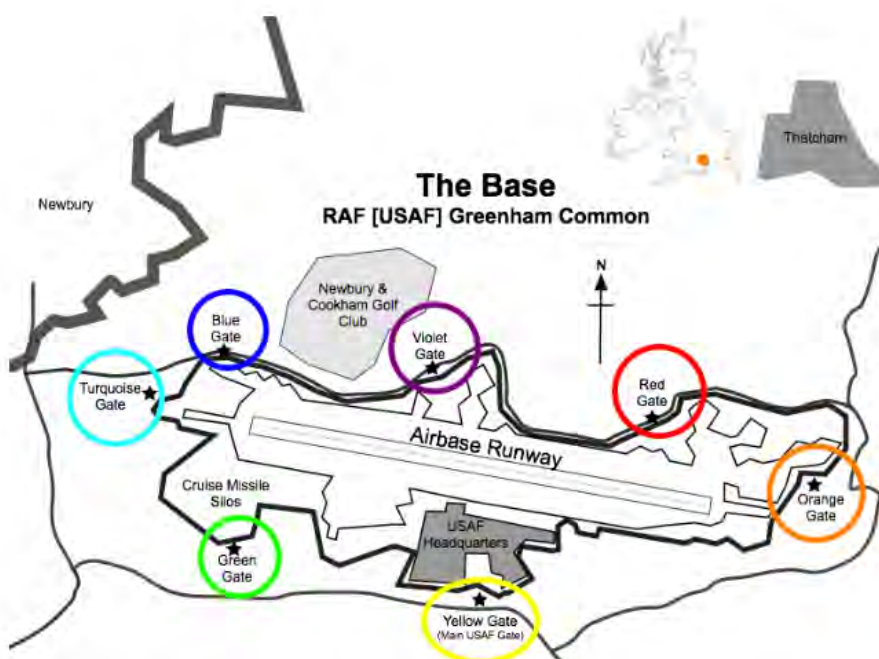
- 3.21 The Victoria County History records that *“In the 15th century Sandleford Priory declined. Simon Dam, a prior of evil life, by reckless waste and improvident leases, brought it near ruin, and his successors were unable to retrieve the fortunes of the house. In 1478 it was deserted by the monks and all the Berkshire estate lately belonging to the Prior and convent of Sandleford came into the hands of the Bishop of Salisbury as an escheat on the death of the last prior. The bishop handed them over to his nephew Richard Beauchamp, son and heir of Richard Beauchamp, kt., Lord St. Amand, and he surrendered them the same year to the Dean and Canons of Windsor. The dean and canons seem to have let the house and land as a farm, and the chapel fell out of repair. Little is known of the estate or the lessees for two hundred years. The exception is during the reign of James I when a dispute over tithes came before the King's Bench in 1615, when it was decided that Sandleford was not within the parish of Newbury, but was a parish by itself.”*
- 3.22 The medieval history suggests that the proposed development site was probably part of the open field system farmed throughout the medieval period worked firstly by the monks of Sandleford Priory (MWB2176) and later as part of the Sandleford Estate. The proposed development site, therefore, has no further archaeological potential.

Post Medieval and Modern (including map regression exercise)

- 3.23 The Post-Medieval development of Sandleford is characterised by improvements to the estate. In 1710 the estate was leased to Henry Kingsmill, who died in 1717. It was subsequently let to William Cradock of Gainsford, Durham. In 1715 Cradock married Mary daughter of Gilbert Sheldon of St. Andrew's, Holborn. However, he died in 1736, having disposed of the lease on the estate in 1729 to Thomas Blake, formerly of Croydon, who in 1730 assigned it to Edward Montagu, a grandson of the first Earl of Sandwich. He married in 1742 Elizabeth, daughter of Matthew Robinson of West Layton, Yorkshire. Elizabeth was the famous 'blue stocking' and is better known than her husband. Edward Montagu died in May 1775, and after his death Elizabeth made considerable alterations to the house, adding a new drawing room and converting the ruined chapel into an 'eating room.' She died 25 August 1800 at the age of eighty, when the lease passed to her nephew Matthew Robinson, who had taken the name of Montagu.
- 3.24 Elizabeth Montagu also made extensive improvements to the parkland for which Lancelot 'Capability' Brown (1716-83) provided plans in 1781. At this time the landscape included formal gardens close to the house, and there were no pools along the eastern valley (Fig 2). Brown's design seems to have covered the valley east of the house, down to the sinuous Brown's Pond⁸ and beyond, in order to enhance views from Wyatt's new rooms on the east front of the house. Mrs Montagu continued to follow Brown's plans after his death in 1783, employing one of Brown's former foremen, Samuel Lapidge. The Ordnance Surveyors drawing of 1808 (Fig 3) shows the sinuous line of the former drive from Pinchington Lodge to Sandleford Priory winding across the proposed development site. A short section of this drive is visible in the field adjacent to the Lodge, though 19th and 20th century maps show the route of this drive changed in particular between 1808 and 1873 when two drives are evident.
- 3.25 From 1835 the estate was leased by William Chatteris (d 1889), during whose occupation further work occurred in the gardens, including extensive rhododendron planting. Chatteris bought the freehold of the estate from the Dean and Chapter of St George's Chapel in 1871.

⁸ The ponds are referred to as fishponds on later maps and Phibbs (2017, 40) describes how ponds intended for netting would have had large flat bottoms. On estates like Sandleford the lakes were probably intended for angling and islands deliberately placed within some 10m of the banks to provide for this sport.

- 3.26 In 1947 the estate was sold in separate lots and remains in divided ownership, the house being used as a girls' day school. This situation has remained the same into the 21st century and today the proposed development area is in private hands.
- 3.27 In 1942 Greenham Common airfield opened and was used by both the Royal Air Force and United States Army Air force during the Second World War and the United States Air Force during the Cold War. After the Cold War ended, it was closed in September 1992. In 1997 Greenham Common was designated as public parkland. The common had been made a site of site of Special Scientific Interest (SSSI) in 1985.
- 3.28 In 1981 Greenham common was the focus of an important protest against the maintenance of a nuclear deterrent (MWB 16201) at a time when American Cruise Missiles were based at RAF Greenham Common. The protest – Greenham Common Women's Peace Camp – established several camps close to the airbase. This is specifically the Turquoise Gate Camp. The cruise missiles were removed by 1991 and the airbase was handed back to the RAF in September 1992, and then closed. In 1997, the Common was redesignated as public parkland; it became common land again. The last protesters left their camp in September 2000. In 2021 the 40th anniversary of the protest was celebrated by a march starting in Cardiff on 26th August returning to Greenham Common and calling "for the original women who led it to be remembered and respected as much as the suffragettes".



Plan of the Greenham Common Women's Peace Camps, showing the location of the Turquoise Gate camp.⁹

- 3.29 The HER includes an entry for the protest camps which appears to locates the Turquoise Gate camp within the proposed development site. The protest camps were subject to partial survey by Southampton University/Council for British Archaeology and undertaken by the Common Ground Research Group. The site was visited in 2003 by the Group and became the focus of a pilot project in February 2004. Although significant the camps have no formal designation and the

⁹ From <http://www.orangegatejournal.co.uk/> accessed 26/8/22; see Schofield J 2009

location of the Turquoise Gate Camp, lies to the east of the proposed development immediately adjacent to the perimeter fence.

- 3.30 In the southern section of the proposed development site the lights of the former flight path of the Greenham Common airbase remain where they have fallen following decommissioning. Presently the site is characterised by recent self-seeded trees and some open paddocks.
- 3.31 Parkland development during the 18th and 19th century is still evident in a shallow hollow across part of the development site which remains from the driveway between Pinchington Lodge to Sandleford Priory and later Sandleford Farm. Although there is no further potential for remains of regional or national significance from the Post-Medieval and Modern periods any development would need to take account of this parkland feature.

Built Heritage Assets

- 3.32 The proposed development lies on slightly rising ground in the eastern sector of Sandleford Park (RPG). Today the development site is former agricultural land, largely covered by trees and scrub growth. The site is within the modern parish of Greenham and lies on the east slopes of the shallow valley through which a tributary of the Enbourne Stream flows southwards. The valley and park of the former Sandleford Priory have been managed as parkland at least since the early 18th century when Rocque recorded formal planting near the principal house. At the end of the 18th century Elizabeth Montagu undertook considerable improvements to both house and parkland the latter based on the plans produced by Lancelot 'Capability' Brown in 1781, two years before his death.
- 3.33 There are no listed buildings within a reasonable distance of the proposed development site and no Conservation Area close by. Consequently the assessment which follows focusses on the Sandleford Park (RPG).
- 3.34 In the following section the significance of the registered park and garden (RPG) is noted. This will then form the basis of an impact assessment in sec 4 below.

Sandleford Priory (RPG).

- 3.35 **Significance:** The history has been presented by the Registered Garden entry which largely replicates the Victoria County History summary (see above):

"The estate passed through a series of tenants, the lease being acquired in 1730 by Edward Montagu, a grandson of the first Earl of Sandwich, who married Elizabeth Robinson of Yorkshire in 1742. A painting of 1744 (Harris 1979) shows a terrace on the south front leading down to several rectangular canals (gone, 1998), in the area which is now the south park. After Montagu's death in 1775, his wife, renowned for her intellectual salon and known as 'The Queen of the Bluestockings', made considerable alterations, using James Wyatt (1747-1813) for the house, and Lancelot Brown (1716-83) for the park and garden, for which Brown provided plans in 1781. At this time the landscape still incorporated formal garden elements close to the house, and there were no pools along the eastern valley (estate map, 1781). Brown's design seems to have covered the valley east of the house, down to the sinuous Brown's Pond (which he created or enlarged) and beyond, in order to enhance views from Wyatt's new rooms on the east front (Hinde 1986).

- 3.36 According to Dorothy Stroud (1975), Brown "... is known to have used a variety of trees in his landscapes, both native and exotic such American plane trees and weeping willows; London Planes, Evergreen Oaks ...Brown also favoured Cedar of Lebanon but in often prominent or specific locations. His landscapes also usually feature a woodland belt on the perimeter of the garden...often at the request of the landowner. The woodland belt was intended to make the parkland feel more private"

Mrs Montagu (d 1800), a close friend of the Duchess of Portland who gardened at Bulstrode Park (Bucks, qv), continued to follow Brown's plans after his death in 1783, employing one of Brown's former foremen, Samuel Lapidge, to carry out the remaining work. From 1835 the estate was leased by William Chatteris (d 1889), during whose occupation further work occurred in the gardens, including extensive rhododendron planting, and who bought the freehold of the estate from the Dean and Chapter of St George's Chapel in 1871. In 1947 the estate was sold in separate lots and remains (1998) in divided ownership, the house being used as a girls' day school".

- 3.37 In the 20th century the parkland area was reduced to an area east of the A34 and the parkland designated in 1987. The northern sector of the park to the west of the brook and fishponds was developed in the late 20th and early 21st century in three areas. These were south of Deadman's Lane in an area of former quarrying, focused on Capability Way, Sandleford Lane and Sandleford Lodge Park.
- 3.38 **Setting:** The setting of the park has also been described by the list entry: *"The 55ha site is bounded to the west by Newtown Road, this being part of the A34 connecting Oxford and Newbury with Winchester, to the south by the county boundary with Hampshire, marked by the River Enborne, and beyond this the village of Newtown, and to the north by a 1990s retail development. The east boundary lies adjacent to the agricultural and wooded land of Greenham Common. The site is situated on a south-facing hillside which generally slopes down from north to south. The setting is partly urban, with the southern extremity of Newbury close by to the north, and agricultural, with the former western parkland (Conveyance map, 1871) lying adjacent to the west of the A34. The latter area contains a former drive, now a track, which gave access from the A343 Andover road (OS 1882). The southern parkland is divided at its south end by the A339 road to Basingstoke which runs along the north side of the Newtown Pond. Long views from the house extend west, over the former parkland, and south, to the Hampshire/Berkshire Downs."*
- 3.39 **Setting and Significance:** The contribution that the setting makes to the parkland in the area of the proposed development site at Pinchington Lodge is muted. Pinchington Lodge has been almost entirely rebuilt and Pinchington Lane is a modern road with 20th and 21st development along its northern side in a small estate ranged around Night Owls and Haysoms Drive. To the west and within the parkland is the development area south of Deadman's Lane, whilst the setting of the RPG in the north west comprises an industrial and retail area bounded by Deadman's Lane, Pinchington Lane and the A34 Newbury Road. The northern setting therefore makes no positive contribution to the Registered Parkland area.
- 3.40 To the east the setting of the heavily wooded valley and over grown ponds which characterise the parkland adjacent to the proposed development site are bounded by the remnants of the Greenham Common airbase, now a country park. This makes a neutral contribution to the significance of the parkland, and is divided from it by a fence and a wide shallow boundary ditch and bank. To the south and south west the setting of the RPG is agricultural land including Peckmore Copse, the village of Newtown and the River Enborne valley. However as the list description makes clear it is views to the west which were important from the main house of Sandleford Priory (II*).

4 IMPACT ASSESSMENT

Proposed Development and Design Iteration

- 4.1 The proposal is for the residential development of land in a small area south of Pinchington Lane, and west of Pinchington Lodge. The proposed development site lies in a small northern sector of the Sandleford Park RPG in an area which is dominated by self-seeded woodland and the remnants of the former flight path approach lighting for Greenham Common airfield.
- 4.2 The proposal has been designed to deliver *“a successful scheme on the Site that delivers a high-quality landscape-led development providing new homes that are sensitively integrated into the community in a sustainable location.”*¹⁰



Proposed location and design concept

- 4.3 The proposed development is situated within the registered parkland of Sandleford (RPG) and in assessing the impact of development on the historic environment, some or all of the following factors may influence what will make redevelopment successful:¹¹
- Scale, height, massing, alignment, materials and proposed use:

¹⁰ Pro Vision 2-22 “Land South of Pinchington Lane, Greenham, Newbury, Vision Document” July 2022

¹¹ Historic England, 2015, GPA 2, para 53

- The history of the place
- The relationship of the proposal to its specific site
- The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept
- The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size
- The size and density of the proposal related to that of the existing and neighbouring uses
- Landmarks and other built or landscape features which are key to a sense of place
- The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces
- The topography
- Views into, through and from the site and its surroundings
- Landscape design
- The current and historic uses in the area and the urban grain
- The quality of the materials

4.4 More specifically Historic England's designation guidance¹² suggests that the impact and capacity for change depends upon the heritage values of the parkland encapsulated in their authenticity, rarity, engagement with the landscape and condition.

Impacts on Below Ground Archaeology

- 4.5 The NPPF in section 12 Conserving and Enhancing the Historic Environment, employs the concept of significance as the basis for assessing impact on the historic environment and historic assets. The NPPF notes that 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of harm or loss and the significance of the heritage asset'.
- 4.6 The proposed development at Pinchington Lodge will take place where the land has remained in agricultural use or parkland use for since the 11th century. The evidence to date suggests site has little potential for archaeological deposits of more than local value from the prehistoric and Roman periods but does include part of a drive from the Post-Medieval Parkland.
- 4.7 Mitigation of the effects of development can take several forms and NPPF, para 131, notes that when determining planning applications, local planning authorities should take account of the *'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'*. In this case the ground conditions preclude the use of geophysical survey and trial trenching amongst the trees. Given the slight potential of the development site and the prevailing ground conditions. A mitigation strategy designed in consultation with the local authority could be achieved by planning consent condition.
- 4.8 In conclusion the proposed development falls within that group of development sites where there is no evident potential for significant surviving archaeological evidence from the prehistoric and

¹², Historic England 2017 *Rural Landscapes- Register of Parks and Gardens Selection Guide* London:English Heritage

Roman periods, but where there is evidence of Post Medieval parkland. It is unlikely, however, that further information regarding the history and archaeology of the parkland of more than local interest will be revealed by archaeological investigation; consequently this assessment concludes that the impact of development on the historic environment after mitigation will be neutral (no harm) in accordance with the principles of the NPPF.

- 4.9 The findings of this assessment are consistent with the local plan in that it has ensured that the Borough's historic environment has been identified and that its recommendations are in accordance with the heritage value of the proposed development site.

Impact on the Character of Heritage Assets

Sandleford Park (RPG) (II)

- 4.10 The NPPF in section 12 Conserving and Enhancing the Historic Environment, employs the concept of significance as the basis for assessing impact on the historic environment and historic assets; paragraph 135 notes that "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset." Local Plan policy CS 19 requires that "the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced, the natural, cultural, and functional components of its character will be considered as a whole."
- 4.11 In section 3 above, the significance of Sandleford Park has been described. The proposed development area occupies a northern section of the park where visibility of the development from within the RPG will be limited by the topography and existing modern development. There will be zero visibility of the development from the majority of the park, beyond the proposed development site, given the topography, existing planting and existing modern development. In particular the residential area in the north west sector of the parkland, south of Deadman's Lane constrains views towards the valley area of the park. The proposed development site will be briefly glimpsed whilst progressing along Pinchington Lane and from within the former RAF Greenham Common airbase, though views of the actual built development will be limited due to the existing and proposed planting along the site boundaries. The development area will be experienced and visible from the public footpath to the south between Greenham Common and Sandleford Lane, however again this will be a view across the pond towards the wooded area in the south of the site, which will screen views of any actual built development.
- 4.12 The impact of residential development at Pinchington Lane can be described as introducing a further small area of around 60 houses into an area presently characterised by the proximity of housing, overgrown and self-seeded woodland and Pinchington Lane. The change to the RPG at this point will materially affect the character of the park introducing a further area of housing and reducing the parkland area, transforming it from its present overgrown state to a residential area. Development would appear similar to that south of Deadman's Lane and extend the residential area beyond Pinchington Lane. The nature of the topography suggests any impact on the lower parkland to the south will be limited in its visual impact and means little perception of change when entering or experiencing the park either from Greenham Common, from the area of St Gabriel's school or when traveling along the A339.
- 4.13 The heritage significance of Sandleford Park (RPG) and 2 listed buildings, Sandleford Priory (I) and Stables (II) which make up the former core of the estate can be summarised in terms of authenticity, rarity, engagement with the landscape and condition, as follows:
- Sandleford Priory (now St Gabriel's School) is significant for its architecture and its association with James Wyatt who designed the house which was substantially re-built in

1780-1. The house is important for its surviving 14th century work and as an excellent and complete example of 18th Gothick.

- The Stables are noteworthy for their association with James Wyatt, now part of the school and built in 1780-1.
- The parkland landscape was commissioned by Elizabeth Montagu from Lancelot Brown (1716-83). Brown provided plans in 1781 when the landscape still incorporated formal garden elements close to the house, and there were no pools along the eastern valley. Brown's design covered the valley east of the house, down to the sinuous Brown's Pond (which he created or enlarged) and beyond, in order to enhance views from Wyatt's new rooms on the east front (Hinde 1986).
- From 1835 the estate was leased by William Chatteris (d 1889), during whose occupation further work occurred in the gardens, including extensive rhododendron planting.
- In terms of evidential value, the park can be divided into north and south halves. The northern half contains a caravan park, lying north-west of the upper ponds, together with gravel workings towards the north-east corner. The area along the former northern boundary has been eroded by the insertion of houses and a refuse collection point.
- The former north drive entered the park 400m north of the house close to the junction of Deadman's Lane with the A34, past Pinchington Lodge, a rendered cottage of one-and-a-half storeys. The drive, traces of which remain visible in the park, curved south across a plateau and then down through the park, with extensive views to the south and west, arriving at the west front.

4.14 The location of the proposed residential development lies west of Pinchington Lodge within the parkland boundary in area of open animal grazing land and re-seeded woodland. The topography of the proposed development area, distance from the Priory and Stables, and the nature of the topography combine to provide a location which ensures that the visual character of the managed parkland area is maintained.

4.15 In assessing the impact of the proposed residential development the NPPF emphasises the surroundings in which heritage assets are experienced.¹³ Present experience of the parkland in the north east is characterised by self-seeded trees and scrub growth as well as a small paddock area. The setting of the development area includes residential development within the parkland lying north-west of the upper ponds, together with gravel workings towards the north-east corner. The area along the former northern boundary has been eroded by the insertion of houses and a refuse collection point.

4.16 Experience of the historic buildings at the core of the park is presently characterised by the facilities of St Gabriel's school. No key views towards the Priory or from the Priory towards the development have been identified, nor does the area encroach on any recognisably important visual and spatial relationship between Priory and former lodge. Although representing change to the setting of these assets the nature of that change is such that neither experience of both the Hall or Stables, nor the present managed parkland will be materially affected by the proposed development.

4.17 The proposed development area at Sandleford Park occupies an area where the impact of development will be through the creation of a residential area within the registered park and garden (RPG). Visibility of the development in the majority of the park will be limited by the topography and existing modern development, in particular the residential area to the north west

¹³ Setting of Heritage Assets NPPF 2021, Annex 2

south of Deadman's Lane. The views of the proposed development site are briefly glimpsed whilst progressing along Pinchington Lane, from within the nature reserve of Greenham Common (former airbase) and from the public footpath to the south between the former airbase and Sandleford Lane.

- 4.18 The impact of residential development at Pinchington Lane can be described as introducing a further small area of housing into an area presently characterised by the proximity of housing, overgrown parkland and Pinchington Lane. The change to the parkland at this point will materially affect the character of the park introducing an area of housing and reducing the parkland area, transforming it from its present overgrown state to a residential area. Development would appear similar to that south of Deadman's Lane and extend the residential area beyond Pinchington Lane. The nature of the topography suggests any impact on the lower parkland to the south will be limited and create little perception of change when entering the park from Greenham Common or from the area of St Gabriel's school. Experience of the park will be limited to the presence of the new housing in a sector presently unrecognisable as parkland with some knowledge of historic documents and mapping. The physical impact will be more direct on what was in 1781 heath farmland flanking a narrow stream valley (Fig 2 , 1781 estate Map). Although included with the parkland of Sandleford Priory by 1808 the most significant change to the landscape was the insertion of a carriage way from Pinchington Lodge, which appears to run through a sparsely wooded area (OSD 79 Fig 3). This landscape remained as parkland during the 19th century (Fig 5, Estate map by William Chatteris), but by 1900 (Fig 7 OS Ed) it had become the site of quarrying and by 1932 it had been detached from park and fenced as private land. The development site has remained in private hands since the 1930s characterised by woodland and a small paddock.

Mitigation

- 4.19 Mitigation of the effects of development can take several forms and NPPF notes that when determining planning applications, local planning authorities should take account of the 'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'.
- 4.20 No site specific mitigation has been identified as being necessary with regard to below ground archaeology though it is likely that further assessment and evaluation would be appropriate.
- 4.21 In relation to the impact on the parkland the following factors have been taken into account. Firstly residential development at Pinchington Lane will somewhat disrupt the visual quality of the parkland on its northern boundary and distract attention away from the spatial relationship of the fishponds and parkland to the south.
- 4.22 Secondly development of the Pinchington Lane area will increase the amount of light spill, noise and traffic to an extent that would adversely affect the heritage significance of the northern parkland. The location of the proposed development is also likely to change appreciation of the landscape in general terms when progressing along Pinchington Lane.
- 4.23 Lastly development will also affect perceptions of the historic and spatial relationship of the park with Greenham Common along the eastern boundary and north along Pinchington Lane.
- 4.24 Mitigation by design has involved landscape planting and emphasis on the route of the former carriage ways. These seek to ensure that the impact of development is minimal. These measures apply the following principles:
- Enhancement of the parkland by the inclusion of elements such as the driveway within the masterplan proposals (NPPF para 126; Core Strategy CS19).
 - Limiting the visual impact of new housing on the northern boundary of the park by landscaping (Core Strategy CS19).
 - Maintaining the present wooded character of the area (Core Strategy CS19).

- Ensuring that new development is appropriate in terms of scale and design in the context of the existing settlement form, pattern and character (Core Strategy CS19).

4.25 The design principles set out above, based on national and local plan policy, indicate that the limited visibility of the proposed development area within the woodland west of Pinchington Lodge and the former Greenham Common Airfield, the nature of its construction, both through the layout design and location in partially enclosed woodland, and its low profile ensure that development will have less-than-substantial-harm to Sandleford Priory (RPG) in accordance with the purposes of the NPPF.

5 SUMMARY AND CONCLUSIONS

Summary

- 5.1 This heritage assessment has followed the principles advocated by the NPPF and Historic England. This report has assessed the potential impact of the proposed residential development of land off Pinchington Lane, Greenham, on archaeological deposits and the designated heritage assets.
- 5.2 The assessment is based on documentary, map search, and a site inspection in May 2018 and 2022, which recorded the current condition of the proposed development site and surrounding heritage assets.
- 5.3 The landscape of Pinchington Lane, identified as a reasonable study area, extends to 1km from the proposed development site and includes heritage assets of national importance, dating, principally, from the late medieval and Modern periods. These reflect the changing nature of the historic landscape and recent urban development. In the early 3rd millennium the site remains largely overgrown with areas of grazing north of the school grounds.
- 5.4 With respect to below ground archaeology the nature of the evidence from the Historic Environment Search and the historic evidence from archive and published sources, suggest that it is unlikely that the site will retain any important archaeological evidence of earlier activity. The exceptions are the two routes of the former driveway from Pinchington Lodge to Sandleford Priory and Sandleford Farm, dating to the late 18th and 19th centuries.
- 5.5 The development falls within Sandleford priory (RPG) and the report has assessed the potential impact on the character of the parkland area. With respect to the setting of heritage assets only one asset, Sandleford Priory (now St Gabriel's School), might be considered at risk due to the development. However the development area and the Priory are not intervisible and impact on this listed building has been considered as part of the assessment of impact on the registered park and garden of Sandleford Priory.

Conclusion

- 5.6 In conclusion the site of the proposed development has low potential to impact on below ground archaeology dating to before the creation of the Sandleford Parkland. However it is likely that as a 'greenfield' site further evaluation to assess this potential by the conventional methods of geophysical survey and trial trenching are likely to be requested by the local authority.
- 5.7 The site, whilst within the RPG is in private ownership and has been since the 1930s. The site is not accessible from or connected by footpaths to the remainder of the RPG to the south west. There is therefore no public appreciation or physical indicators of it as being part of a wider landscape setting. The significance and relevance of the RPG designation upon the site has been significantly reduced by the residential development to the west and the site does not in any real sense relate to the remaining significant portion of the RPG situated around St Gabriel's school.
- 5.8 With respect to the impact of development on the RPG this will be harmful, though less than substantially harmful. The impact of development will be due to the reduction in the parkland area, its transformation from parkland to residential and its visual presence when seen from outside the parkland and when viewed from within the park area.
- 5.9 Mitigation to ensure the impact of the development is as low as possible may be achieved by employing the following design principles:
- Enhancing the parkland by the inclusion of elements such as the historic driveways in the masterplan proposals (NPPF para 126; Core Strategy CS19).

- Limiting the impact of new housing on the northern boundary of the park by landscaping (Core Strategy CS19).
- Maintaining the present wooded character of the area (Core Strategy CS19).
- Ensuring that new development is appropriate in terms of scale and design in the context of the existing settlement form, pattern and character (Core Strategy CS19).

5.10 The illustrative proposals seek to include these mitigation design principles through: the design of the layout referencing the historic driveways; the retention and enhancement of existing landscaping on the northern boundary; by maintaining and seeking to enhance the woodland area to the south west, including improving the setting around the fishpond to make it more appreciable in the landscape and; by proposing a development that is carefully designed and considered in form, that will respond appropriately to the context around whilst have due regard and care for its setting within the existing RPG.

5.11 The objective of applying these principles is to ensure that the potential impact of development will be less than substantially harmful for the purposes of the NPPF.

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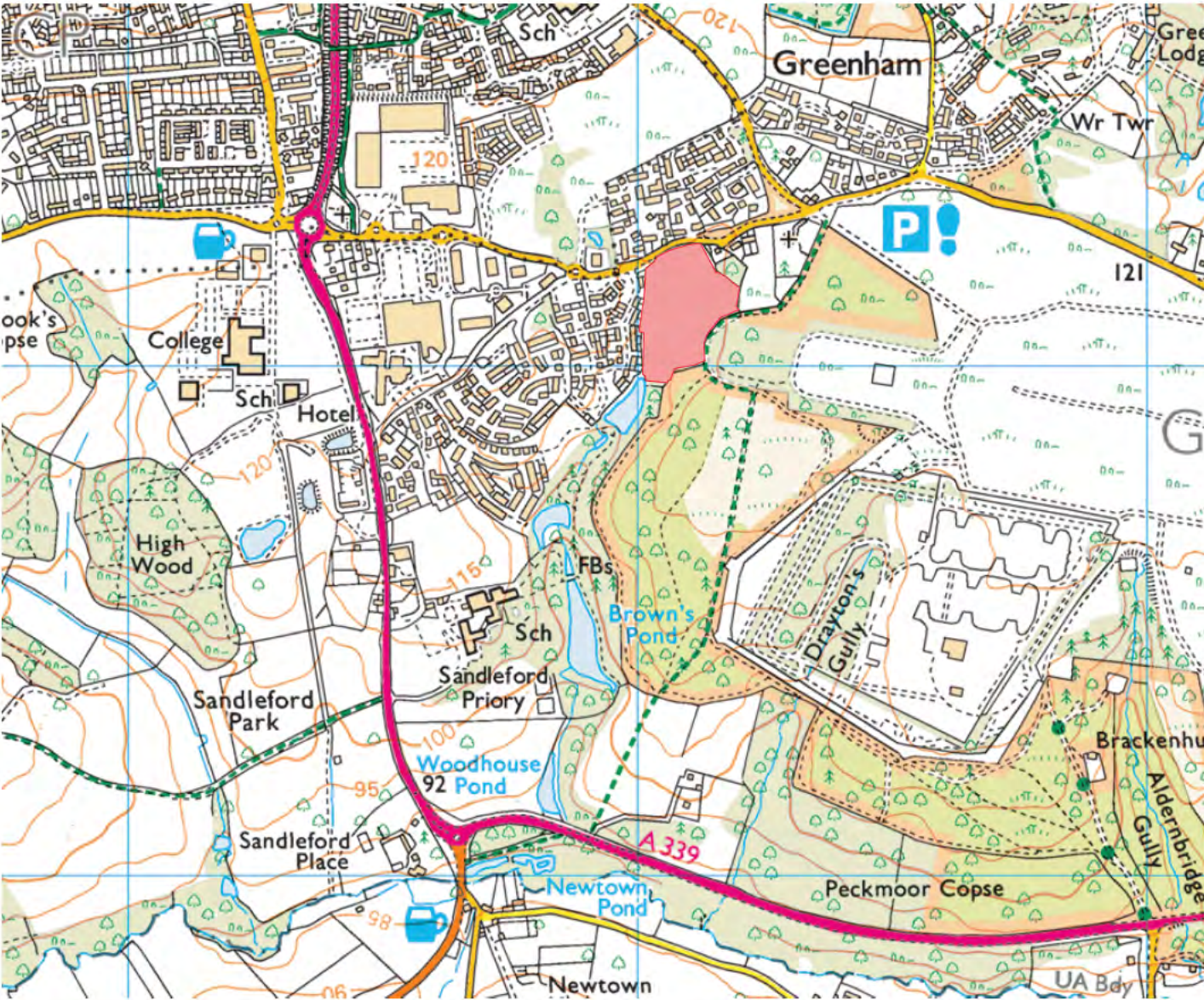
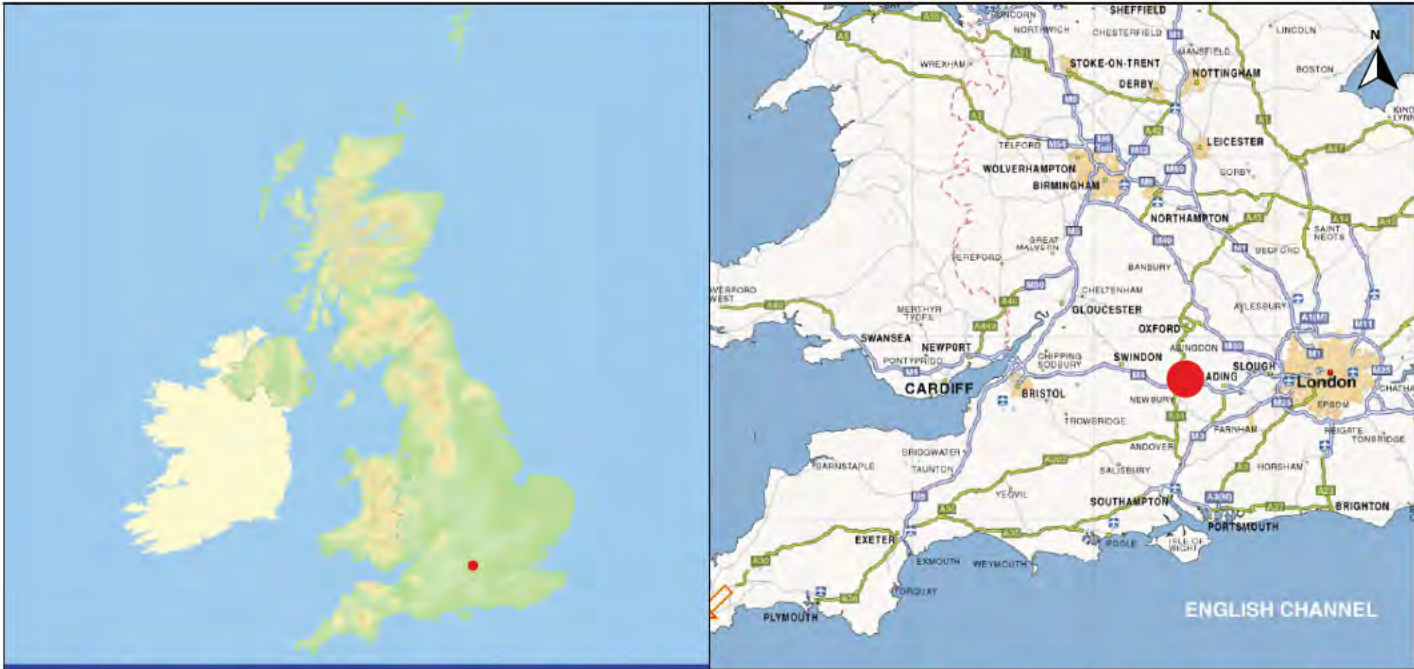


Figure 1: Land at Pinchington Lodge

Site location



Pinchington Lodge

Not to scale
Illustrative only

15/8/22

Drawn by: MD

Checked by:



Figure 2:
Estate Map of Sandleford
Priory in 1781.

Note the orientation
of the plan with South
to the top.

Location of the proposed
development area.



Sandleford Priory

 **MAKING
COMPLEX
EASY**

Not to scale
Illustrative only

Date printed:
14/5/18

Drawn by: MD
Checked by:



Figure 3:
Estate Map of
Sandleford
Priory in 1808
(Charles Budgen
Ordnance Surveyor,
OSD79)

Location of the
proposed development
site



Sandleford	
 <small>MAKING COMPLEX EASY</small>	
Not to scale Illustrative only	
Date printed: 15/8/22	Drawn by: MD Checked by:



Figure 4:
Estate Map of
Sandleford
Priory in 1871
(William Chatteris)

Location of the
proposed
development area

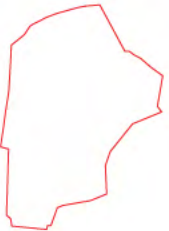


Sandleford	
 MAKING COMPLEX EASY	
Not to scale Illustrative only	
Date printed: 14/5/18	Drawn by: MD Checked by:



Figure 5:
Sandleford
in 1873
OS 1:2500

Proposed
development site



Sandleford	
 <small>MAKING COMPLEX EASY</small>	
Not to scale Illustrative only	
Date printed: 14/5/18	Drawn by: MD Checked by:

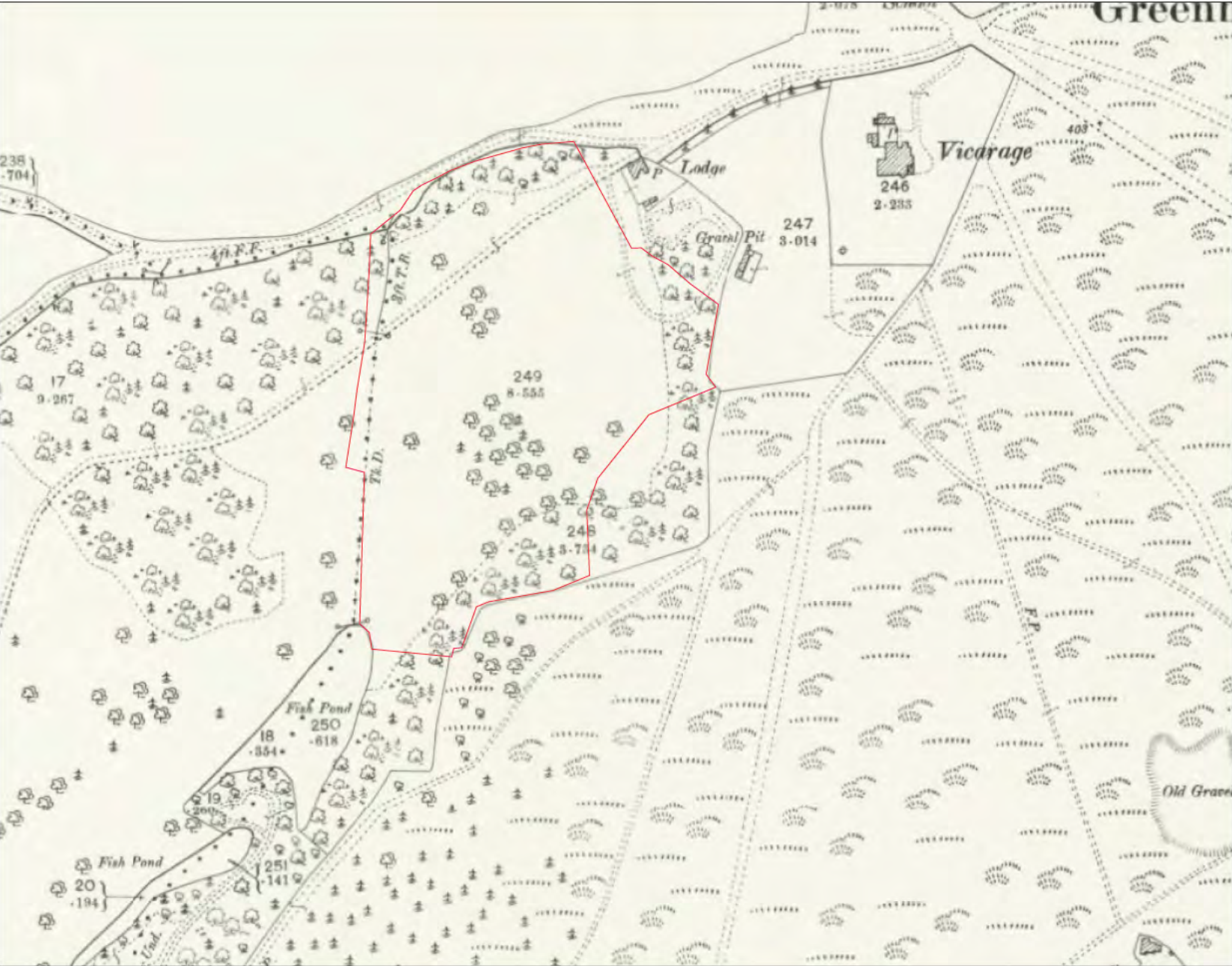
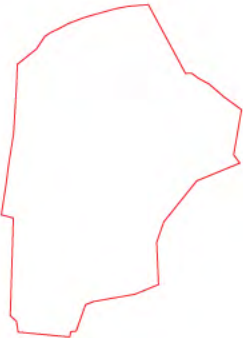


Figure 6:
Sandleford
in 1898
OS 25"

Proposed
Development Site



Sandleford	
Not to scale Illustrative only	
Date printed: 14/5/18	Drawn by: MD Checked by:



Figure 7:
Sandleford
in 1900

Proposed
Development Site



Sandleford	
Not to scale Illustrative only	
Date printed: 14/5/18	Drawn by: MD Checked by:

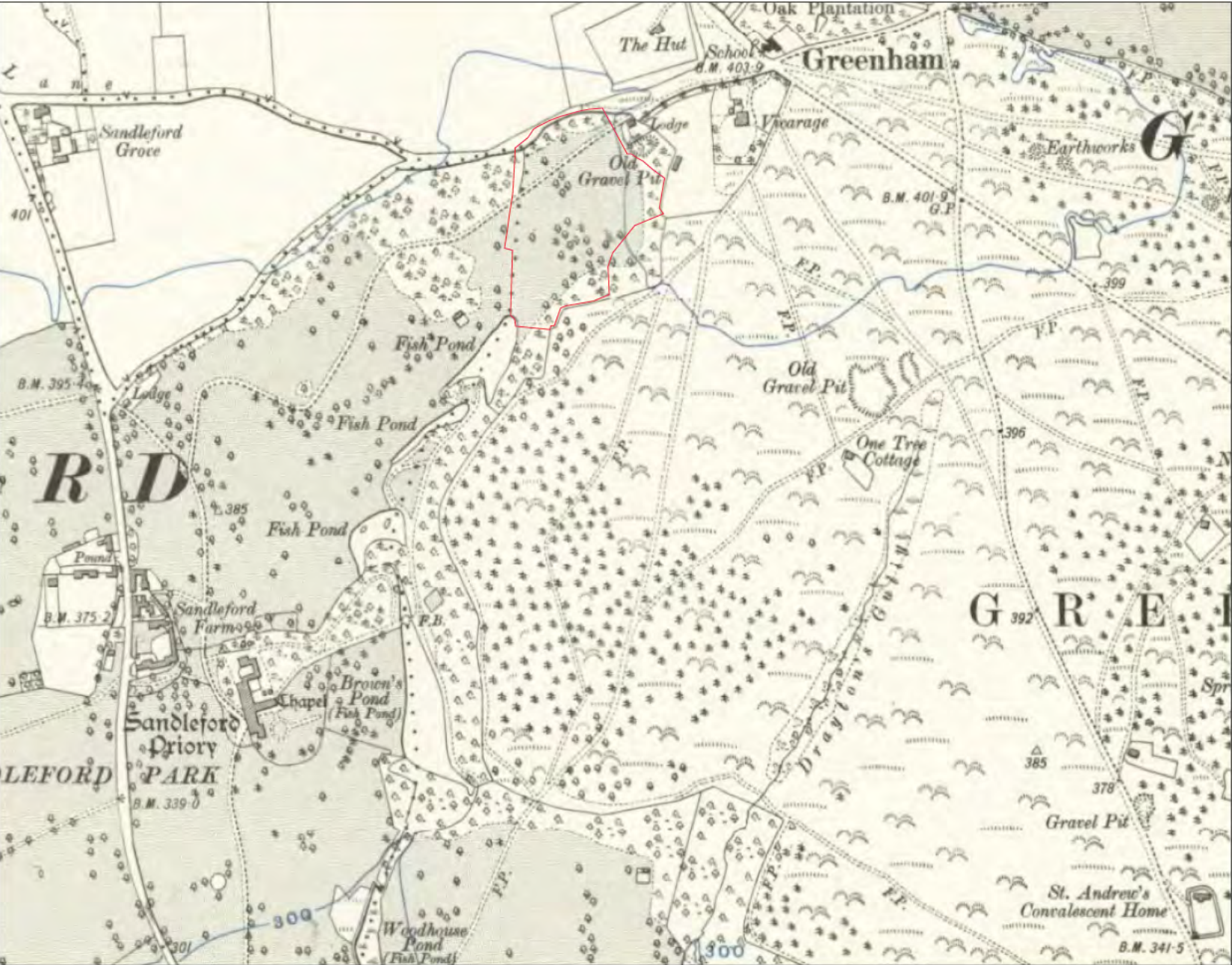


Figure 8:
Sandleford
in 1913

Proposed
Development Area



Sandleford	
 MAKING COMPLEX EASY	
Not to scale Illustrative only	
Date printed: 14/5/18	Drawn by: MD Checked by:

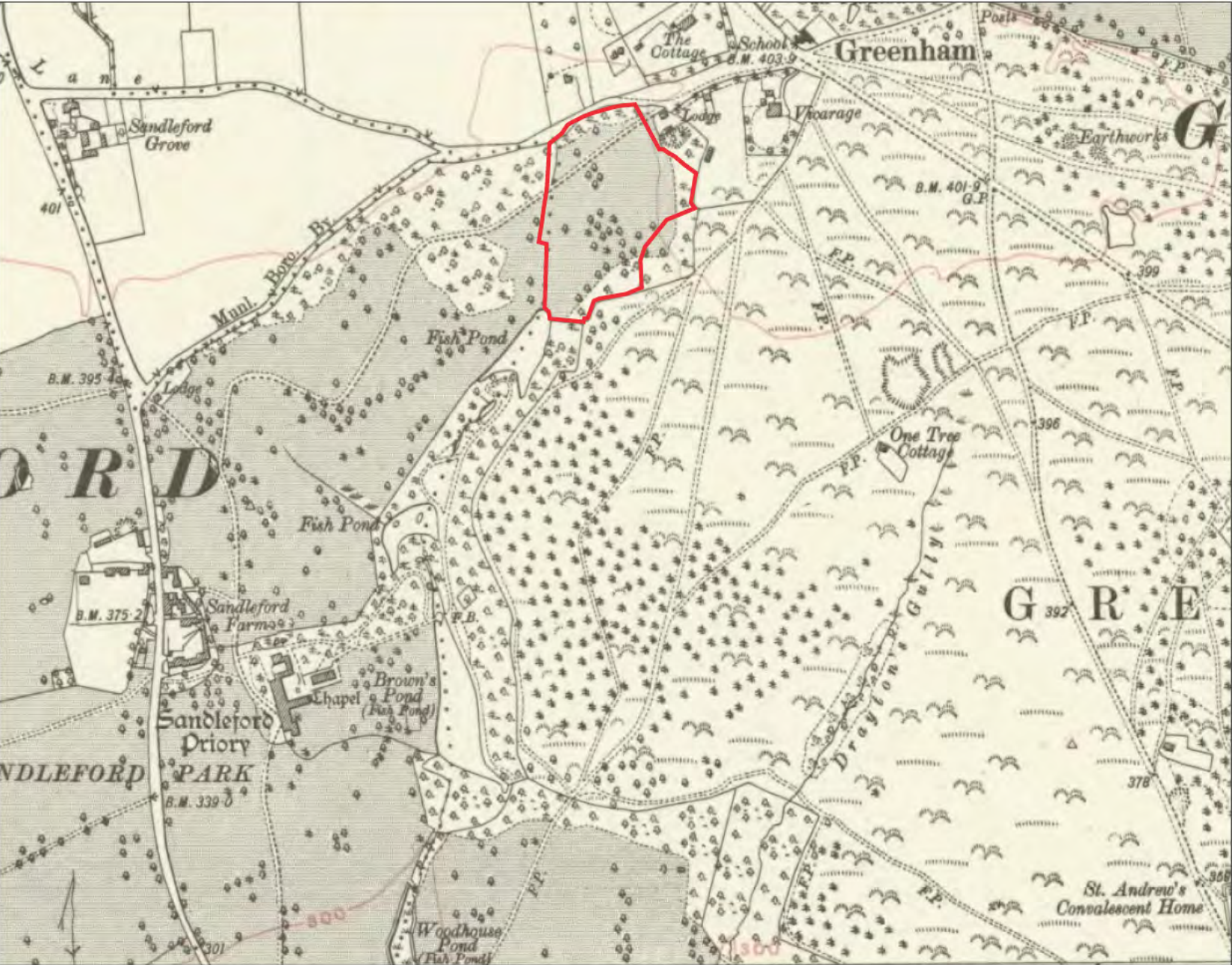


Figure 9:
Sandleford
in 1932

Proposed
Development Area



Sandleford	
 MAKING COMPLEX EASY	
Not to scale Illustrative only	
Date printed: 14/5/18	Drawn by: MD Checked by:

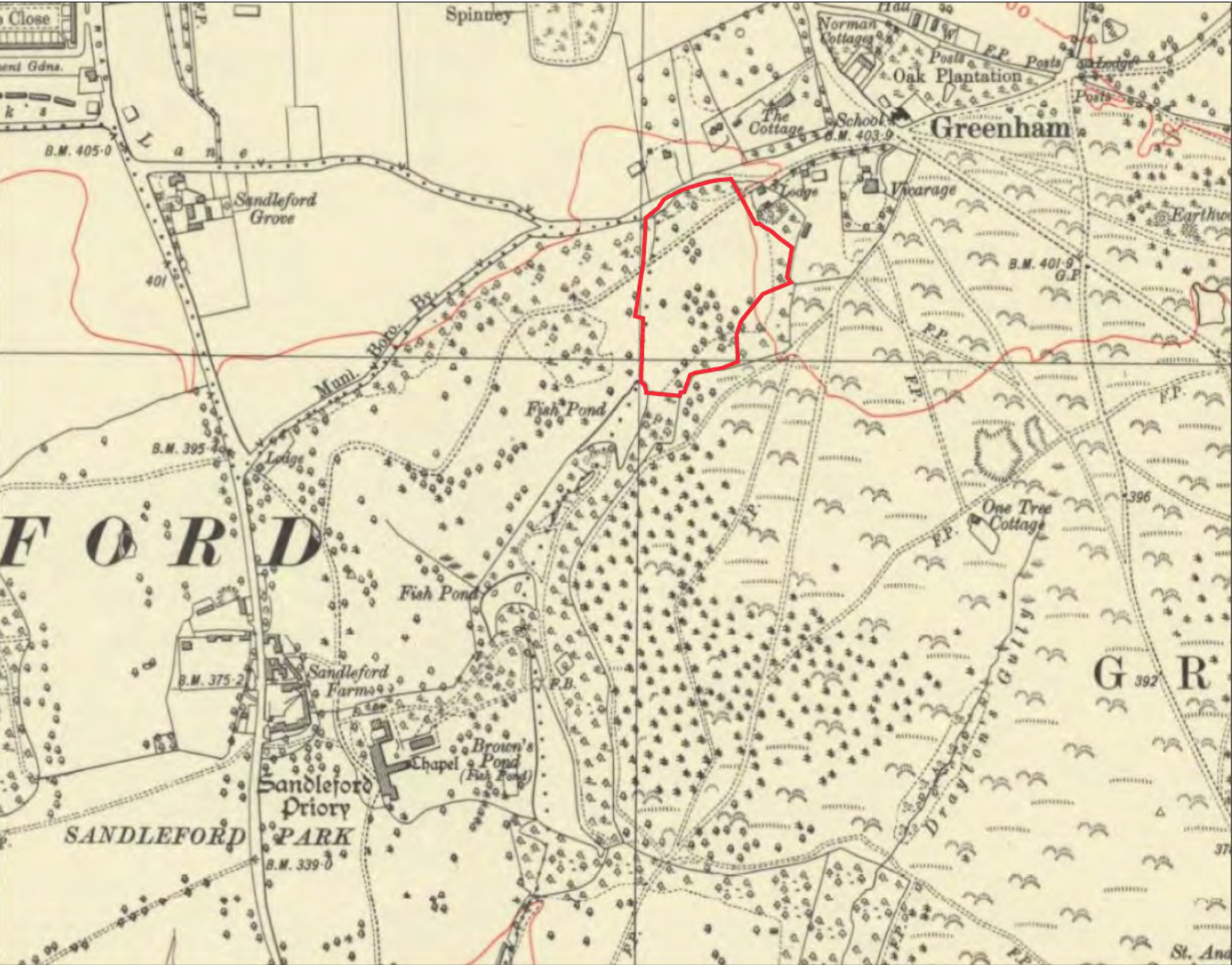


Figure 10:
Sandleford
in 1938 published
1944

Proposed
Development Area



Sandleford	
 MAKING COMPLEX EASY	
Not to scale Illustrative only	
Date printed: 14/5/18	Drawn by: MD Checked by:

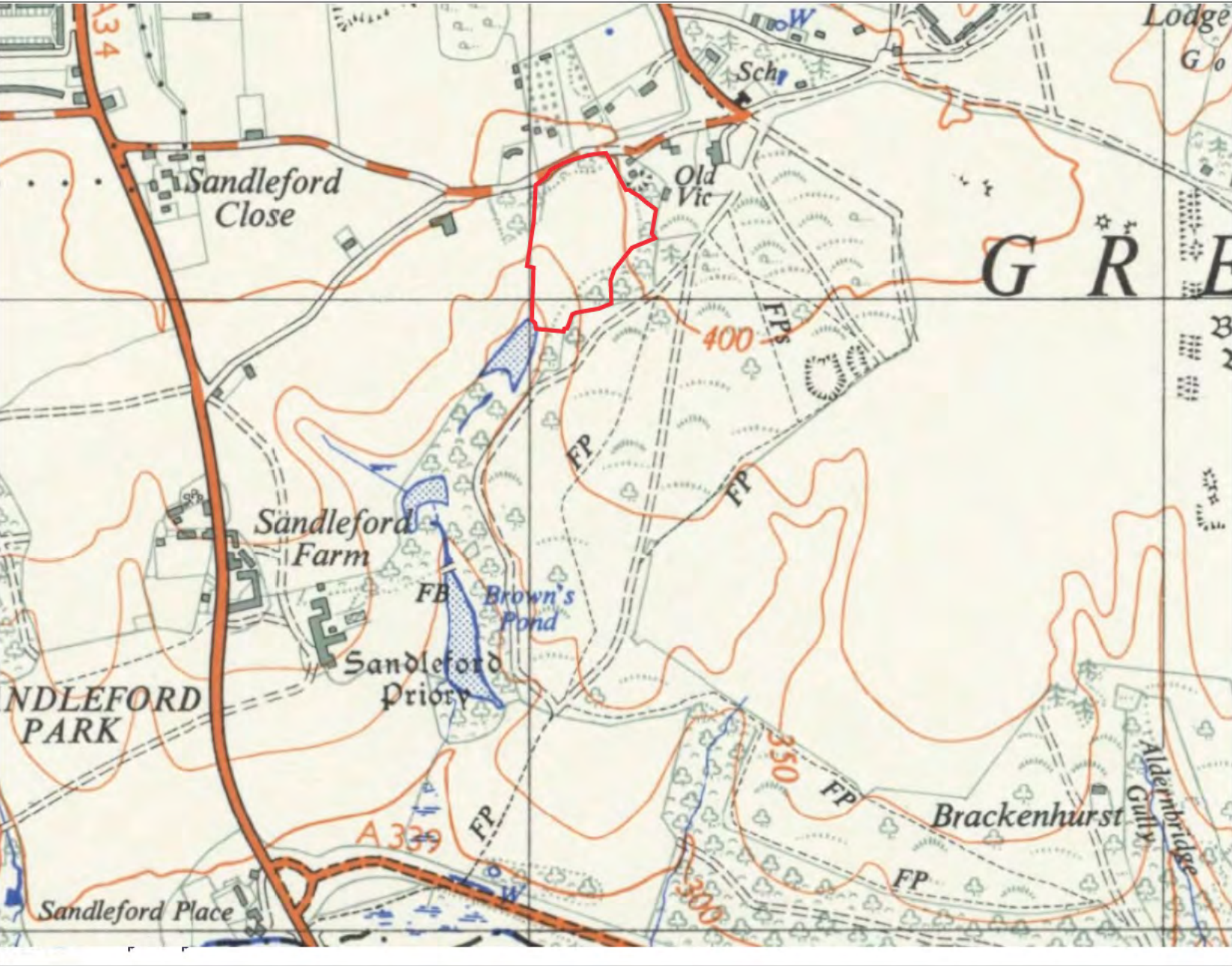


Figure 10:
Sandleford
in 1961
1" - 1 Mile

Proposed
Development Site



Sandleford	
	
Not to scale Illustrative only	
Date printed: 14/5/18	Drawn by: MD Checked by:



Figure 12:
Sandleford
in 2017
(Google Earth)

Proposed
Development Site



Former Greenham
Common Airfield



Sandleford	
Not to scale Illustrative only	
Date printed: 14/5/18	Drawn by: MD
	Checked by:



Fig 13 Upper - View west towards Capability Way
Lower - View south across the former flight path
towards the first fish pond

Pinchington Lodge

Not to scale
Illustrative only

Date printed:
28/5/18

Drawn by: MD
Checked by:

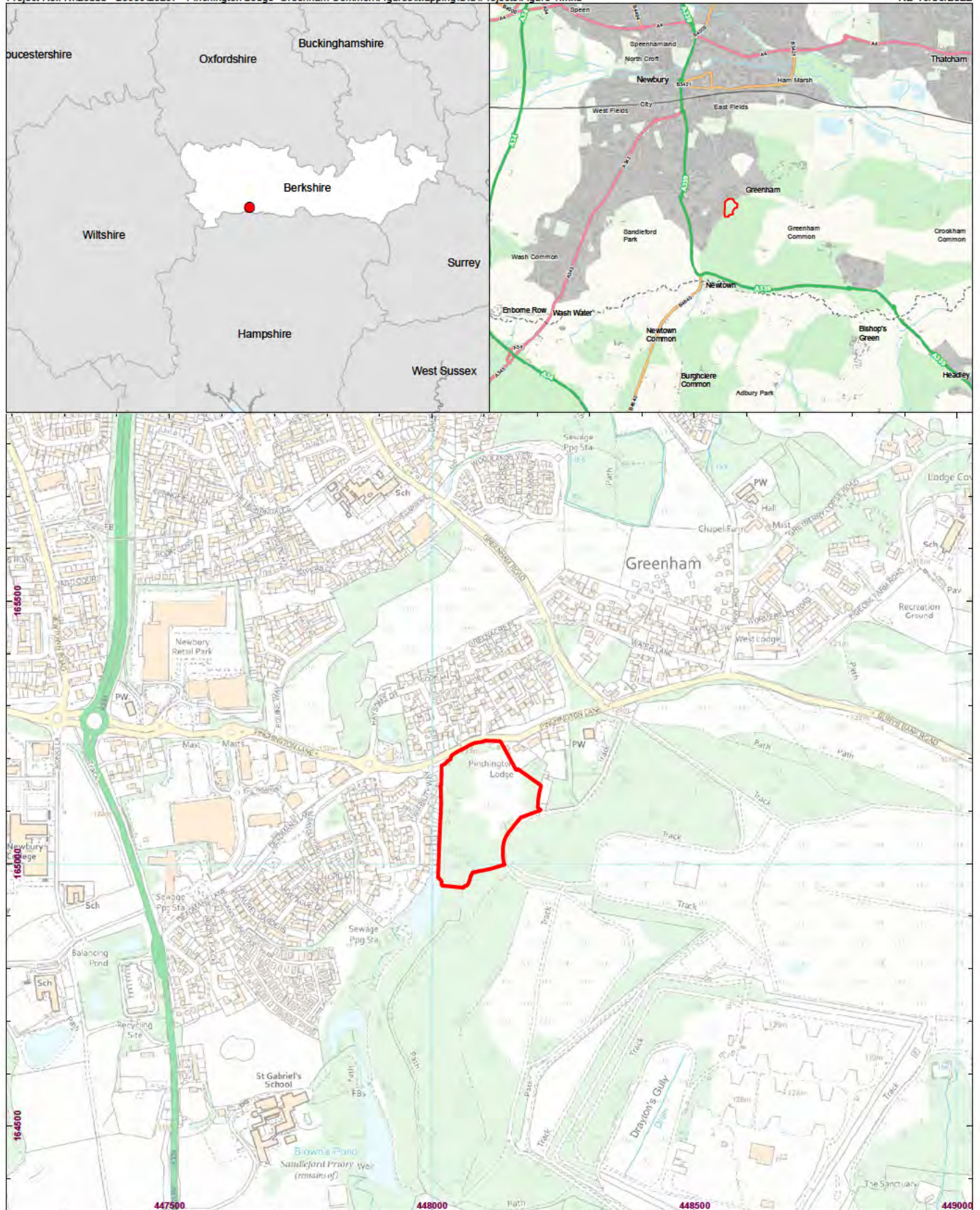




APPENDICES

Appendix A

Historic Environment Record Data



 Site Boundary

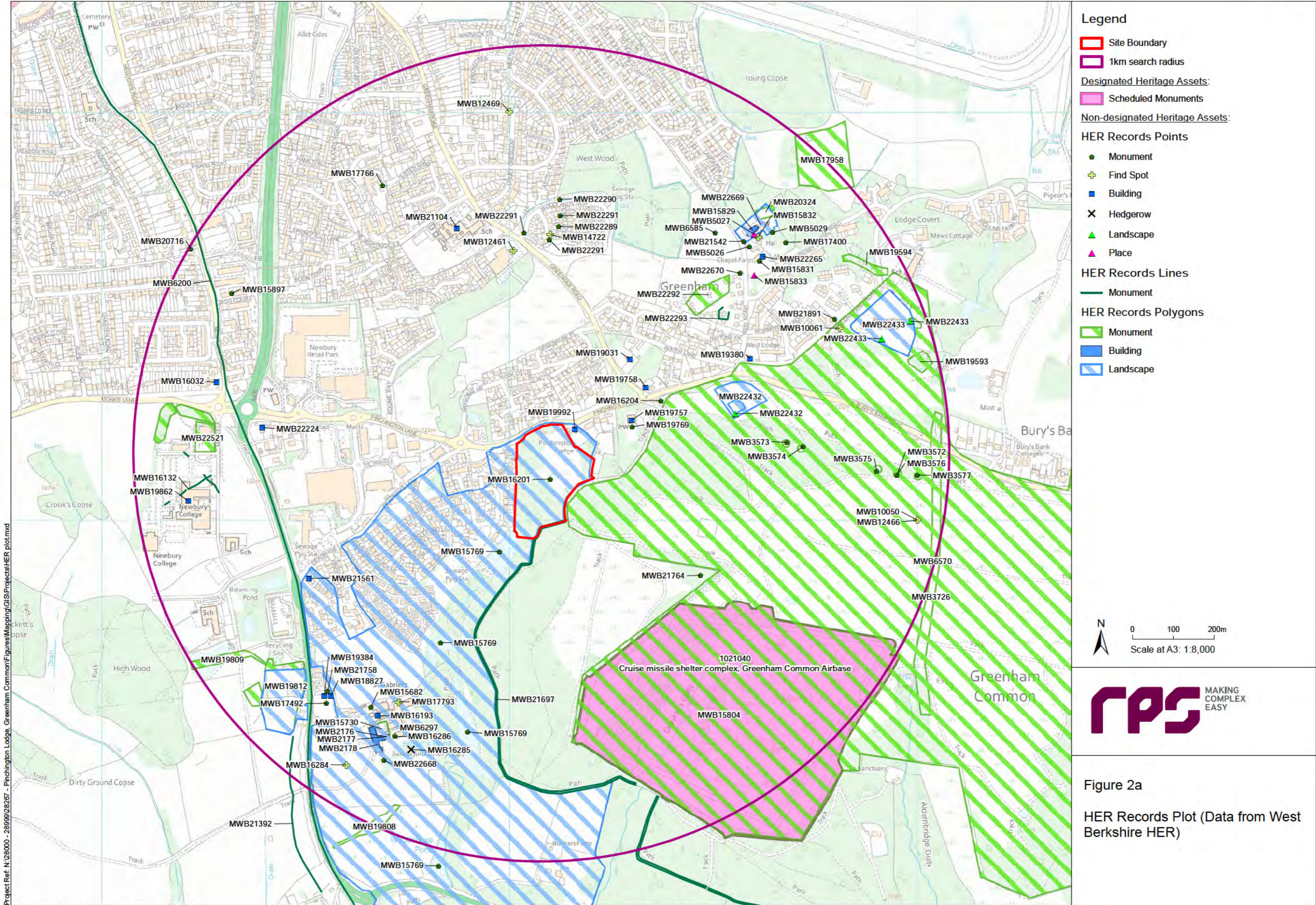


0 100 200m
Scale at A4: 1:10,000

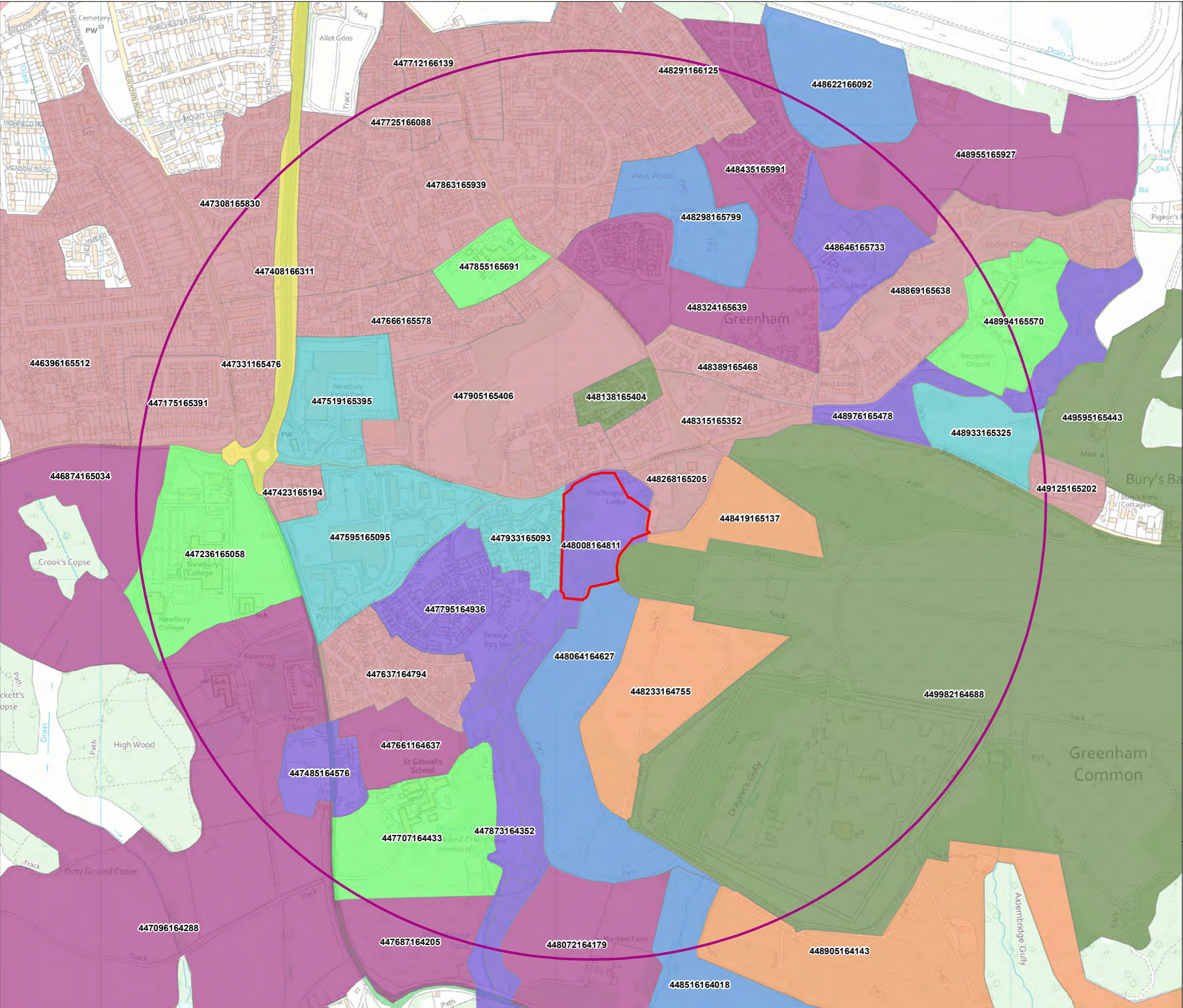
rps MAKING
COMPLEX
EASY

Figure 1

Site Location



Project Ref: N128000 - 28999128267 - Pinchington Lodge, Greenham Common\Figures\Mapping\GIS\Projects\HER plot.mxd



Legend

- Site Boundary
- 1km search radius

Historic Landscape Characterisation:

- civic
- communication
- enclosures and farming
- industrial and commercial
- open land
- parkland
- recreation
- settlement
- woodland



0 100 200m
Scale at A3: 1:8,000



Figure 2c
HLC Plot (Data from West Berkshire HER)



Legend

 Site Boundary

LiDAR DATA

Source:
Environment Agency

Data Type: DTM

Resolution: 1m

Date Captured:
17/03/2019

Processing:
Multi-direction Hillshade overlaid on
simple Local Relief Model



0 25 50m
Scale at A3: 1:2,000



Figure 3

LiDAR Plot

HER Events

EvUID	Name	Organisati
EWB1078	Sandleford Farm - Assessment of evidence for an icehouse	The Historic Environment Consultancy
EWB1595	Highwood Copse Primary School, Newbury - Desk-based Assessment	Thames Valley Archaeological Services
EWB1598	Land east of Greenham Road, Greenham, Newbury - Desk-based Assessment	Thames Valley Archaeological Services
EWB164	Bury's Bank Excavation 1941	
EWB658	Hounsells Land, Deadmans Lane, Newbury - Archaeological Desk-Based Assessment	Davies Light Associates
EWB893	Civic Amenity Centre - Proposed Land and Buildings at Sandleford Farm, Newbury	Oxford Archaeology
EWB1746	Lesok Cottage, Newbury, Berkshire: Heritage Statement	Wessex Archaeology
EWB1793	Land North of Newbury College, Monks Lane, Newbury: Desk Based Assessment	Heritage Planning Services
EWB1835	Land at Newbury College, Sandleford Park, Newbury: Archaeological Desk-Based Assessment	Thames Valley Archaeological Services
EWB1923	Land East of Newbury College, Monks Lane, Newbury: Desk Based Assessment	Heritage Planning Services
EWB2001	Common Ground: Researching the Material Culture and Meaning of Greenham Common Women's Peace Camps	The Common Ground Research Group
EWB1013	HWRC Sandleford Farm, Newbury - Archaeological Watching Brief	Oxford Archaeology
EWB111	Sandleford Priory - Levelling of east-west bank in grounds of St Gabriel's School	Berkshire County Council
EWB1140	St Gabriel's School, Sandleford Priory, Greenham, West Berkshire - Archaeological Watching Brief	John Moore Heritage Services
EWB1140	St Gabriel's School, Sandleford Priory, Greenham, West Berkshire - Archaeological Watching Brief	John Moore Heritage Services
EWB1200	Conservation/ Heritage Statements for Sandleford Farm	The Historic Environment Consultancy

EWB1256	Historical Environmental Survey and Management Plan for Greenham and Crookham Commons	Berkshire Archaeological Services
EWB1298	Former Kitchen Garden, Sandleford Priory, Greenham, Heritage Statement	WYG
EWB130	Balancing Pond and Outfall Pipe, Sandleford	Berkshire County Council
EWB1315	Greenacres, Greenham Road, Newbury, West Berkshire - An archaeological desk-based assessment	Thames Valley Archaeological Services
EWB1324	Conservation Audit in respect of Sandleford Park	Skilldraw Ltd
EWB1350	Newbury Racecourse, Newbury, Berkshire: Archaeological Evaluation Interim Report	Wessex Archaeology
EWB15	Lower Kennet Valley Survey - 1st phase of fieldwalking	Berkshire Archaeological Unit
EWB1572	Sandleford Farmhouse, Sandleford - Heritage Statement	Oxford Archaeology
EWB1589	Archaeological Evaluation at Sandleford Farm, Newtown Road, Newbury	John Moore Heritage Services
EWB1608	Highwood Copse Primary School, Newbury, West Berkshire - Geophysical Survey	Thames Valley Archaeological Services
EWB171	Sandleford Park, Newbury, Berkshire - Desk-based assessment	Lawson-Price Environmental
EWB1713	Land East of Greenham Road, Greenham, Newbury: An Archaeological Evaluation	Thames Valley Archaeological Services
EWB172	Sandleford Park, Newbury, Berkshire - Fieldwalking	Thames Valley Archaeological Services
EWB1753	Land West of New Road, Pyle Hill, Greenham, Newbury - Geophysical Survey (Magnetic) Report	Thames Valley Archaeological Services
EWB1808	Tracing Their Steps: Predictive Mapping of Upper Palaeolithic and Mesolithic Archaeology	Historic England
EWB1816	Land West of New Road, Pyle Hill, Newbury: Archaeological Evaluation	Thames Valley Archaeological Services
EWB37	Former Greenham Common Airbase	Thames Valley Archaeological Services
EWB376	Newbury College Phase One, Watching Brief	Genius Loci
EWB627	Watching Brief at St Gabriel's School, Newbury, Berkshire	
EWB768	St Gabriel's School, Sandleford Priory, Greenham - Report on Archaeological Watching Brief Phase 2	

EWB936

Historic Environment Assessment and Conservation of Building
Research Analysis of Sandleford Farm

The Historic Environment Consultancy

HER Records

MonUID	Name	Period
MWB10050	GREENHAM COMMON area	Lower Palaeolithic
MWB10061	Near Pigeon's Farm Road, Greenham	Palaeolithic
MWB12461	In Pyle Hill Gravel Pit	Roman
MWB12466	Greenham, Lloyd Baxendale's estate - general location	Roman
MWB12469	At Stroud Green, Greenham	Roman
MWB14722	Field northeast of Greenham Road	Roman
MWB15682	Sandleford Priory icehouse	19th century to Second World War
MWB15769	Sandleford Priory fishponds	Medieval to Late 19th century
MWB15769	Sandleford Priory fishponds	Medieval to Late 19th century
MWB15769	Sandleford Priory fishponds	Medieval to Late 19th century
MWB15769	Sandleford Priory fishponds	Medieval to Late 19th century
MWB15769	Sandleford Priory fishponds	Medieval to Late 19th century
MWB15831	Site of Greenham Manor House - uncertain location	Medieval to 18th century
MWB15832	NEW CHURCH HALL, ST MARY'S, GREENHAM	13th century to 14th century
MWB15833	Greenham Preceptory - unknown exact location	12th century to 16th century
MWB15897	Site of Newbury Union Workhouse (Sandleford Hospital)	19th century to Late 20th century - Present
MWB16032	Newtown Road Garage, Newbury	Modern
MWB16193	Sandleford Priory Stable Block	18th century to Unknown
MWB16201	Greenham Common peace camp - Turquoise Gate	Late 20th century - Present
MWB16204	Greenham Common peace camp - Blue Gate	Late 20th century - Present
MWB16284	Front of Sandleford Priory - approximate location	13th century to 14th century
MWB16285	Punch's Oak, Sandleford Priory - approximate location	18th century to Early 21st century
MWB16286	Religious house at Sandleford (pre priory)	12th century
MWB17400	Chapel Farm, Greenham	18th century to Late 19th century
MWB17492	Sandleford Farm	18th century to Late 19th century
MWB17766	Spring at Pyle Hill - unknown exact location	Mid to Late 19th century
MWB17793	At site of new Sports Hall, St Gabriel's School	19th century to Mid 20th century

MWB18827	Dairy adjoining Sandleford Farmhouse to the east	Mid to Late 19th century to Early 21st century
MWB19031	Lesok Cottage and Norman Cottage, Greenham (formerly Pilehill Cottages)	Late 19th century
MWB19380	West Lodge, Greenham	Late 19th century
MWB19384	Sandleford Farmhouse	18th century to Late 19th century
MWB19757	Church of Jesus Christ of Latter-day Saints, Pinchington Lane, Greenham	Late 20th century - Present
MWB19758	The Old School House, Greenham	Late 19th century to Mid 20th century
MWB19769	Site of former Greenham Vicarage	Late 19th century to Late 20th century - Present
MWB19862	Newbury College, Monks Lane, Newbury	Late 20th century - Present to Early 21st century
MWB19992	Pinchington Lodge, Greenham	19th century to Late 19th century
MWB20716	Site of the Rokeby Arms, 143 Newtown Road, Newbury	Victorian to Late 20th century - Present
MWB21104	The Willows School, Newbury (formerly Greenham Court Primary School)	Late 20th century to Early 21st century
MWB21542	Lych gate to St Mary's Church, Greenham	Early 20th century to Early to Mid 20th century
MWB21561	Sandleford Priory Lodge, 4 Deadman's Lane, Greenham	19th century to Late 19th century
MWB21758	Remains of possibly outbuilding at Sandleford Farm, Newbury	Mid to Late 19th century
MWB21764	Greenham Common peace camp - Emerald Gate	Late 20th century - Present
MWB3573	Circular feature "A" GREENHAM COMMON	Undated
MWB3574	Circular feature "B" GREENHAM COMMON	Undated
MWB3575	Circular feature "C" GREENHAM COMMON	Undated
MWB3576	Circular feature "D" GREENHAM COMMON	Undated
MWB3577	Circular feature "E" GREENHAM COMMON	Undated
MWB5026	Greenham Village	Medieval to Late 19th century
MWB5027	GREENHAM	11th century to Medieval
MWB5029	Site of St Mary's Chapel, Greenham	11th century to Late 19th century

MWB6585	ST MARY'S GREENHAM EARTHWORK	Undated
MWB21891	Greenham Water Tower	Late 20th century - Present
MWB22265	Chapel Farm, New Road, Greenham	18th century to Late 20th century
MWB22289	Ditch on land east of Greenham Road, Greenham	Roman to Medieval
MWB22290	Ditch on land east of Greenham Road, Greenham	Roman to Medieval
MWB22291	Ditches on land east of Greenham Road, Greenham	Unknown
MWB22291	Ditches on land east of Greenham Road, Greenham	Unknown
MWB22291	Ditches on land east of Greenham Road, Greenham	Unknown
MWB22224	Sandleford Grove, Newtown Road, Newbury	Late 19th century
MWB22432	Site of baseball diamond, off Bury's Bank Road, Greenham Common	Later 20th century to Cold War
MWB22433	John W Mello Playing Field, Greenham Common	Cold War to Early 21st century
MWB22433	John W Mello Playing Field, Greenham Common	Cold War to Early 21st century
MWB22668	Site of a sundial, Sandleford Park	Mid to Late 19th century to Early 20th century
MWB22670	Early Bronze Age pit on land to the west of New Road, Pyle Hill	Early Bronze Age
MWB16132	Field System at Newbury College	Roman
MWB16132	Field System at Newbury College	Roman
MWB16132	Field System at Newbury College	Roman
MWB16132	Field System at Newbury College	Roman
MWB16132	Field System at Newbury College	Roman
MWB21392	Hollow way north of Sandleford Place, Greenham	Post Medieval
MWB21697	Greenham Common boundary bank, near Sandleford and GAMA	Medieval to Late 19th century
MWB6200	Newbury to South Toll Road	18th century to Late 19th century
MWB22293	Late Bronze Age features on land to the west of New Road, Pyle Hill	Late Bronze Age
MWB15730	Sandleford Priory monastic cemetery	12th century to 17th century
MWB15804	GAMA - Cruise Missile Shelter Complex, Greenham Common airbase	Mid 20th century - Present to Late 20th century - Present
MWB15829	St Mary's Church, Greenham	Late 19th century - Present to Early 20th century
MWB17958	Earthworks north of Greyberry Copse Road, Greenham	Medieval

MWB19593	Features north of Greenham Common	Early 20th century to Mid 20th century
MWB19593	Features north of Greenham Common	Early 20th century to Mid 20th century
MWB19594	Features east of Greenham Lodge	Unknown
MWB19808	Feature south of Sandleford Priory	Unknown
MWB19809	Features east of High Wood, Sandleford	Post Medieval to 18th century
MWB19809	Features east of High Wood, Sandleford	Post Medieval to 18th century
MWB19812	Sandleford Priory former kitchen garden	18th century to Late 19th century
MWB20324	Earthwork north of St Mary's Church, Greenham	Medieval to 18th century
MWB2176	Sandleford Priory - General record	12th century to 15th century
MWB2177	Chapel of Sandleford Priory	15th century to 18th century
MWB2178	Sandleford Priory (House) - also known as St Gabriel's School	14th century to Early 21st century
MWB22292	Medieval features on land to the west of New Road, Pyle Hill	Medieval
MWB22432	Site of baseball diamond, off Bury's Bank Road, Greenham Common	Later 20th century to Cold War
MWB22432	Site of baseball diamond, off Bury's Bank Road, Greenham Common	Later 20th century to Cold War
MWB22433	John W Mello Playing Field, Greenham Common	Cold War to Early 21st century
MWB22521	Earth banks north of Newbury College, Monks Lane, Newbury	Late 20th century to Early 21st century
MWB22521	Earth banks north of Newbury College, Monks Lane, Newbury	Late 20th century to Early 21st century
MWB22521	Earth banks north of Newbury College, Monks Lane, Newbury	Late 20th century to Early 21st century
MWB22669	Churchyard of St Mary's Church, Greenham	Mid to Late 19th century to Early 21st century
MWB3572	Circular features on Greenham Common, west of Bury's Bank	Early Neolithic to Late 19th century
MWB3572	Circular features on Greenham Common, west of Bury's Bank	Early Neolithic to Late 19th century
MWB3572	Circular features on Greenham Common, west of Bury's Bank	Early Neolithic to Late 19th century
MWB3572	Circular features on Greenham Common, west of Bury's Bank	Early Neolithic to Late 19th century
MWB3572	Circular features on Greenham Common, west of Bury's Bank	Early Neolithic to Late 19th century
MWB3726	Bury's Bank, Greenham Common	Early Bronze Age to Early Medieval/Dark Age
MWB6297	Sandleford Priory (Park)	18th century to Late 19th century
MWB6570	Greenham Common Airbase (RAF Greenham Common)	Second World War to Late 20th century - Present

Appendix B

Proposed Development Plan





rpsgroup.com

**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	Mr
First Name:*	Paul	James
Last Name:*	McCann	Iles
Job title (where relevant):	Strategic Land Director - England	Director
Organisation (where relevant):	CALA Homes (Chiltern) Ltd	Pro Vision
Address* Please include postcode:		The Lodge, Highcroft Road, Winchester, SO22 5GU
Email address:*		
Telephone number:		01962 677044

*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):	
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP12
Appendix:	
Policies Map:	
Other:	

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:

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		x
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		x
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		x
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		x

Please give reasons for your answer:

Please refer to our representation statement (reference 50847).

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

x

Please give reasons for your answer:

Please refer to our representation statement (reference 50847).

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 our representation statement (reference 50847).

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:

To examine our objections to the development strategy.

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	<input checked="" type="checkbox"/>
The publication of the report of the Inspector appointed to carry out the examination	<input checked="" type="checkbox"/>
The adoption of the Local Plan Review	<input checked="" type="checkbox"/>

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	James Iles	Date	2 March 2023
------------------	------------	-------------	--------------

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

**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

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- *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	Mr
First Name:*	Paul	James
Last Name:*	McCann	Iles
Job title (where relevant):	Strategic Land Director - England	Director
Organisation (where relevant):	CALA Homes (Chiltern) Ltd	Pro Vision
Address* <i>Please include postcode:</i>		The Lodge, Highcroft Road, Winchester, SO22 5GU
Email address:*		
Telephone number:		01962 677044

**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):	
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP13
Appendix:	
Policies Map:	
Other:	

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:

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		x
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		x
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		x
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		x

Please give reasons for your answer:

Please refer to our representation statement (reference 50847).

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

x

Please give reasons for your answer:

Please refer to our representation statement (reference 50847).

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 our representation statement (reference 50847).

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:

To examine our objections to the development strategy.

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	<input checked="" type="checkbox"/>
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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	James Iles	Date	2 March 2023
------------------	------------	-------------	--------------

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

**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	Mr
First Name:*	Paul	James
Last Name:*	McCann	Iles
Job title (where relevant):	Strategic Land Director - England	Director
Organisation (where relevant):	CALA Homes (Chiltern) Ltd	Pro Vision
Address* <i>Please include postcode:</i>		The Lodge, Highcroft Road, Winchester, SO22 5GU
Email address:*		
Telephone number:		01962 677044

**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):	
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP15
Appendix:	
Policies Map:	
Other:	

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:

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		x
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		x
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		x
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		x

Please give reasons for your answer:

Please refer to our representation statement (reference 50847).

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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

x

Please give reasons for your answer:

Please refer to our representation statement (reference 50847).

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).

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Yes

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No

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To examine our objections to the development strategy.

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Please tick all that apply:

Tick

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	Your details	Agent's details (if applicable)
Title:	Mr	Mr
First Name:*	Paul	James
Last Name:*	McCann	Iles
Job title (where relevant):	Strategic Land Director - England	Director
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Address* <i>Please include postcode:</i>		The Lodge, Highcroft Road, Winchester, SO22 5GU
Email address:*		
Telephone number:		01962 677044

**Mandatory field*

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Your name or organisation (and client if you are an agent):	
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	
Appendix:	Appendix 2 Settlement Boundary Review
Policies Map:	
Other:	

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Please give reasons for your answer:

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

Yes

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No

x

Please give reasons for your answer:

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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:

To examine our objections and proposed modifications to the proposed amendments to the settlement boundary in Hungerford.

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Signature	James Iles	Date	2 March 2023
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WEST BERKSHIRE LOCAL PLAN REVIEW

Representation on Regulation 19 Consultation on the
proposed submission West Berkshire Local Plan Review 2022
– 2039 (dated January 2023)

Prepared by Pro Vision on behalf of CALA Homes (Chiltern) Ltd

2 March 2023

REPRESENTATION ON REGULATION 19 CONSULTATION ON THE PROPOSED SUBMISSION WEST
BERKSHIRE LOCAL PLAN REVIEW 2022 – 2039 (DATED JANUARY 2023)

WEST BERKSHIRE LOCAL PLAN REVIEW

PROJECT NO. 50847

PREPARED BY:

JAMES ILES MRTPI

DATE:

2 MARCH 2023

PRO VISION

THE LODGE

HIGHCROFT ROAD

WINCHESTER

HAMPSHIRE

SO22 5GU

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CONTENTS

1.0	Introduction and background	1
2.0	The housing requirement	2
3.0	Local housing need in the AONB and specifically in Hungerford.....	7
4.0	Meeting the housing requirement.....	11
5.0	Settlement boundary review	17

APPENDICES

Appendix A – South Oxfordshire Local Plan (Policy H4)	
Appendix B – Hungerford Housing Needs Assessment (HNA), Aecom (April 2019)	

1.0 Introduction and background

- 1.1 This representation is made by Pro Vision on behalf of CALA Homes (Chiltern) Ltd (abbreviated to 'CALA').
- 1.2 In summary, we have concerns that the Local Plan Review (LPR) is not sound in several respects and that modifications to the development strategy are required. As such, we identify proposed amendments to help remedy the issues we identify.
- 1.3 We elaborate on representations made at previous stages of the plan (Regulation 19 consultations) as well as commenting on new evidence and amendments to the spatial strategy.
- 1.4 This representation is made specifically in the context of its land interests in Hungerford (land east and west of Salisbury Road, Hungerford¹) and the overall development strategy, including the approach to meeting development needs in the Area of Outstanding Natural Beauty (AONB). As such, CALA is a stakeholder in the proposed development strategy.
- 1.5 CALA has one other interest in the context of the LPR² and has made separate representations. Sections 2 and 4 of this representation are very similar to sections 2 and 3 of that representation.
- 1.6 In summary, the representations identify potential issues of soundness³ with the LPR:
- The approach to setting the housing requirement for the district;
 - The approach to meeting the requirement; and
 - Specific concerns about the strategy for the AONB area, including Hungerford.

¹ The sites have been identified in the Council's Housing and Economic Land Availability Assessment (HELAA): sites HUN012 and HUN014 respectively

² Land South of Pinchington Lane, Greenham, Newbury (Site GRE1)

³ With reference to the tests of soundness set out in the National Planning Policy Framework, 2021 (paragraph 35).

2.0 The housing requirement

- 2.1 We have concerns regarding the effectiveness of the proposed development strategy as set out for housing in Policy SP12.
- 2.2 Policy SP12 explains that provision will be made for a range of 8,721 to 9,146 net additional homes for the plan period.
- 2.3 We consider that there is clear justification for higher housing growth in the district to meet the level of need identified in the evidence, not least in respect of addressing affordability.

Affordable housing

- 2.4 Addressing affordability of homes in the district is clearly a very significant matter for the LPR.
- 2.5 The Vision (Chapter 3) of the Plan states that the Council will ensure that delivering “...housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability” [our emphasis].
- 2.6 This is backed-up by the evidence base. The Updated Housing Needs Assessment (dated, July 2022) confirms that there is a “notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the District” [our emphasis]. The conclusion adds that “the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise” [our emphasis].
- 2.7 The report advises that the scale of affordable housing need is 697 dpa (a 188% increase on need following the Council’s Housing Needs Assessment in 2020). This is also 136% of the standard method minimum LHN. Accordingly, the report advises that theoretically, if 40% of all new housing delivered was for affordable housing around 1,740 dpa would be needed to meet West Berkshire’s affordable housing need in full (paragraph 3.24). The Council’s affordable housing position is clearly worsening.
- 2.8 It is acknowledged that the delivery of housing in line with the standard method figure may over time improve the affordability of market housing (and thus reduce affordable housing needs) through the affordability uplift in the standard method. However, West Berkshire’s past housing delivery rates have generally been in line - if not greater - than the current minimum LHN and yet affordability problems/affordable housing need remains pressing. As

a result, not positively addressing the affordability problems and affordable housing need across West Berkshire in this plan period could have significant social and economic consequences which do not appear to have been appropriately considered, including in the Sustainability Appraisal (SA/SEA) for Policy SP12.

- 2.9 In this context, we have doubt that the LPR's housing requirement will be effective in improving affordability and therefore risks failing to deliver on its own vision. For this reason, the calculation of affordable housing need supports an increase in the overall housing requirement.
- 2.10 Please also see section 3, where we comment more specifically on the housing need in Hungerford.

Buffer to housing supply

- 2.11 The LPR's housing target includes a 5% 'buffer' on top of the LHN at the top end of the range.
- 2.12 The Council states in its Housing Background Paper (HBP) that its plans to meet the upper of the range in an effort to boost supply and have some built-in flexibility⁴.
- 2.13 The Regulation 18 version of the West Berks LPR included a 10% buffer. The Council's explanation for the reduction is the limitations and constraints of a largely rural district⁵. On the face of it, that is justified by the Written Ministerial Statement in the HBP.
- 2.14 However, this appears to be counter-intuitive; the greater level of constraint, the greater level of buffer is required to provide greater prospect of meeting the housing need, especially where one of the Plan's priorities is to improve affordability. Furthermore, the SA/SEA undertakes an analysis, at Appendix 4 Section 2.1, between LHN+ 5% and LHN+ 10%. The LHN + 10% scores significantly better with 'overall positive, with some significantly positive effects'. However, the SA/SEA concludes at Table 26 of the report that this would put the rural nature of the district at undue pressure. The SA/SEA therefore takes forward a apparently incorrect interpretation of the evidence base.
- 2.15 The Council does not provide any justification that a 10% buffer/uplift (or greater) to the housing requirement could not be accommodated within the district. Indeed, none of the key

⁴ Housing Background Paper (January 2023); paragraph 2.36.

⁵ Housing Background Paper (January 2023); paragraph 2.33.

environmental constraints (e.g. AONB) in the district or the rural nature of the district preclude the principle of residential development (different to floodplain, Green Belt, internationally protected habitats etc.), but instead will shape the scale, form and direction of growth across the district via the broad spatial strategy.

- 2.16 Evidence in the HELAA indicates that there are many more available sites in the HELAA to accommodate further growth, notwithstanding that not all of them can be expected to prove to be suitable and achievable.
- 2.17 In addition, an appropriate buffer will support greater flexibility in the Plan if the anticipated housing supply does not deliver. This is considered further at Section 4 below.
- 2.18 A more effective buffer/uplift to the housing requirement is likely to fall between 10-20%. This would increase the Council's target housing requirement to 564 - 616 dpa, which would equate to finding a supply of 9,588 – 10,472 dwellings up to 2039. This would more closely follow the tried and tested approach in other recently adopted Local Plans, including South Oxfordshire (c. 27% buffer), Windsor & Maidenhead (c. 12% buffer), and North Herts (c. 13% buffer), notwithstanding that all of these districts vary in the precise nature of their constraints and opportunities. Further, the neighbouring draft Wokingham Local Plan currently includes a 20% buffer.

Duty to cooperate

- 2.19 The LPR⁶ notes that there is a current unmet need from Reading Borough Council of around 230 dwellings up to 2036 and that there will be a need to consider any further unmet need given the housing needs generated by the standard method (i.e. the government's 35% uplift to Reading as one of the largest urban areas in England)⁷.
- 2.20 Reading has identified that a five year review of its Plan is required by 2024. This will need to include an urban capacity assessment. A revised future unmet need figure is therefore likely to be available shortly. It is anticipated that the future unmet need from Reading will be significant – the housing requirement increases to 907 dpa from Lichfield's analysis of the standard method for local housing need, dated April 2022 (from 689 dpa in the current Reading Borough Local Plan). However, at this stage without further evidence there is no certainty on what the unmet need will be or how it will be redistributed. However, it is widely accepted

⁶ Paragraphs 6.5 to 6.8

⁷ Discussed at paragraph 2.24 of the Housing Background Paper (January 2023).

that Reading has limited land capacity to deliver these additional housing requirements in full and, therefore, highly likely that neighbours, including West Berkshire will be required to deliver in meeting some of this unmet need.

- 2.21 In this context, it is appropriate that the LPR plans positively for greater flexibility in its housing requirement rather than reacting to events during the plan period.

Strategy for the North Wessex Downs Area of Outstanding Natural Beauty (AONB)

- 2.22 Policy SP15 identifies a total of 414 homes for the AONB over the plan period (including a proportion which will need to be found through neighbourhood plans). This equates to around 4.5%⁸ of the housing provision for the district.
- 2.23 Policy SP15 includes deferring the identification of specific sites for the requirement in Hungerford and Lambourn to the respective emerging neighbourhood plans.
- 2.24 Whilst we have no objection to this approach, and indeed, CALA has been actively engaged in supporting the Town Council's work on the Hungerford Neighbourhood Plan, what is missing is a contingency in the event that, for whatever reasons, the neighbourhood plan process does not succeed as expected. The process has inherent uncertainty within it, not least the public referendum stage.
- 2.25 Therefore, the LPR should include a contingency whereby it is clear what the alternative is if the neighbourhood plan process does not work out as expected⁹.
- 2.26 An obvious option would be to include a time limit within the LPR for sites to be identified and confirmed as allocations (the South Oxfordshire Local Plan provides a local precedent for this¹⁰).
- 2.27 Although the LPR is expected to be reviewed on a 5 year basis, deferring the contingency to these reviews risks significant delay in meeting identified needs. A positive planning approach would be to include the contingency in the LPR (involving a modification to Policy SP15 and the supporting text, including paragraph 6.40 and 6.41).

⁸ The LPR makes provision for 8,721 to 9,146 additional homes over the plan period.

⁹ CALA's site (HUN14) was identified in the summer last year by the Town Council as its preferred site for meeting the LPR's housing requirement.

¹⁰ South Oxfordshire Local Plan 2011 -2035 (Adopted December 2020) (Policy H4). A copy of the policy is provided at Appendix A.

- 2.28 On a side point, we would also note that there seems little (if any) purpose to listing the Compton and Hermitage Neighbourhood Plans in policy SP15, which is about site allocations in the AONB area. Both are now listed as providing no additional homes.

3.0 Local housing need in the AONB and specifically in Hungerford

- 3.1 A stated priority for the LPR, set out in the Vision, is to address affordability of homes for the local population¹¹.
- 3.2 As addressed in the previous section, the proposed spatial strategy makes policy decisions about how to apportion the development needs across the spatial areas. “Modest”, or more accurately, very modest, growth is proposed to be directed to the AONB area.
- 3.3 Specifically within Hungerford, the main settlement of the AONB area, what does the evidence base say about local need?

Affordable housing

- 3.4 In terms of the published evidence base, noting that the Strategic Housing Market Assessment has not been updated since 2016, a key evidence document for the LPR is the Updated Housing Need Evidence (UHNE) , covering the period 2021 to 2039, which provides information on the need for affordable housing.
- 3.5 This report does not appear to drill down to specific settlements, but does give useful information of need by spatial area.
- 3.6 The UHNE identifies a need for 152 affordable and social rented homes per annum in the AONB spatial area, and a further 160 shared ownership homes. In both cases , the level of need is noticeably higher in the AONB part of the district than the other sub-areas.
- 3.7 This equates to 46% of the overall need for affordable and social rented homes in the district¹² and 43% of the shared ownership need in the District¹³.
- 3.8 This need is described as “substantial” and “the Council is justified in seeking to maximise the provision of affordable housing on eligible development sites, subject to viability” . However, the proposed scale of the district’s growth directed to the AONB is less than 5% (as explained in the previous section).

¹¹ LPR paragraph 3.2

¹² The District need is 330 affordable homes per year (UHNE, page 3 and Table 4.15)

¹³ The District need for shared ownership is 367 homes per annum (UHNE, page 4 and Table 4.21)

- 3.9 Indeed, the report invites the Council to “consider through plan-making process whether higher housing provision would have positive benefits on affordable housing delivery” .
- 3.10 Noting the proposed spatial strategy is for 500 homes in total (open market and affordable) across the spatial area, there is no prospect whatsoever of the need being met through this plan. The LPR will inevitably fall well short of meeting the need, especially in the AONB spatial area, with significant social and economic consequences.

Need in Hungerford

- 3.11 There appears to be no published evidence behind the LPR on specific need for Hungerford. We assume therefore that local level need is being deferred to the neighbourhood plan process, which is well underway, led by the Town Council.
- 3.12 Therefore, it is relevant to turn to the evidence base supporting the emerging Hungerford Neighbourhood Plan (HNP).
- 3.13 A report into development need was published in 2019 by Aecom to inform the HNP (a copy is provided in appendix B).
- 3.14 At paragraph 3, it is reported that the Housing Needs Figure (HNF) for Hungerford is 27 net additional dwellings per year, equating to a total of 486 over the Plan period (2018 to 2036).
- 3.15 We note that the LPR plan period has been delayed by a couple of years, but not so significantly to mean that this independent calculation of need is no longer accurate or relevant. In need, if anything, the need is likely to have increased.
- 3.16 Further, it is reported that “There is a ***severe lack of suitably affordable houses*** for the population of Hungerford, and ***every effort*** should be made to maximise AH provision going forward....” (Our emphasis).
- 3.17 The Aecom report goes on to note that the HNF is an “upper-bound target that is subject to supply of suitable sites” i.e. that supply of suitable land will be a significant factor in what is a realistic housing target for the settlement. CALA has been cooperating with the HNP process to allow for detailed assessments of available sites.
- 3.18 In accordance with the NPPF, preparation of the HNP has been delayed until a housing requirement is identified through the Local Plan.

- 3.19 The requirement proposed in the Regulation 19 LPR, Policy SP15, is 55 dwellings. That is some 431 fewer than the settlement specific assessment of need. In other words, the proposed requirement for the HNP, if adopted, is just 11% of specific need identified for the town.
- 3.20 Even if you were to include the 100 homes allocated (and now being delivered) under HSA18, the shortfall is substantial at 331 homes (i.e. providing for only 32% of need).
- 3.21 It is not clear in the evidence if site availability has been a factor in the proposed housing requirement, or whether it is a top-down figure based on a proposed spatial strategy of very significant constraint to development in the AONB over the plan period.
- 3.22 It would certainly be appropriate, indeed essential, for the requirement to be tested against the realistic site capacity in the town, which the HNP process is in the process of doing.
- 3.23 As it stands, unless there was clear evidence that capacity was so constrained that no more than around 55 homes could be achieved, the proposed LPR will make a significant contribution to exacerbating housing need in the community.
- 3.24 The implication of such a policy approach is likely to be new households, for example, new families, having to leave the town, with implications for the social fabric and sustainability of the community.
- 3.25 There is evidence to strongly indicate that there is significantly greater capacity in and immediately around the town. Sites HUN12 and HUN14, for example, could potentially deliver in the order of 150 homes immediately adjacent to the current settlement boundary.
- 3.26 In brief summary, initial assessment of the sites for the HNP, and in parallel through the HELAA, has raised no insurmountable constraints to development, albeit both sites, but HUN12 (West of Salisbury Road) in particular, would require careful, landscape led master planning to mitigate impacts in the landscape. The site assessment recognises that specific landscape assessment is required to fully test the site capacities.
- 3.27 The LPR however provides no incentive for the Town Council to look more keenly for available land given the very modest requirement of 55 homes over the plan period. It is evident that the Town Council, quite understandably in some respects (despite its own evidence of local need), is restricting the extent of its growth ambitions.

- 3.28 Noting the relatively prominent status of the town in the district's settlement hierarchy (the main Rural Service Centre in the AONB), and the evidence of local need identified by Aecom, there is clear justification for further growth, without necessarily compromising the designated landscape.
- 3.29 A greater level of positively planned development for the town is likely to help reduce the potential for more ad hoc growth in the AONB area under exceptional circumstances. A shortfall in housing supply during the plan period, escalating affordability issues, and/or growing constraints for development elsewhere in the district (such as the phosphates issues in the Lambourn catchment [Policy DM6, water quality] and the DEPZ constraints [Policy SP4]) could soon put pressure on additional growth in settlements in the AONB.
- 3.30 In summary we are confident that there is greater capacity for more development in Hungerford than the proposed housing requirement (55 homes), and it is the arbitrary LPR requirement that is constraining sustainable growth. Positive planning would involve the LPR looking again at opportunities in the town.
- 3.31 The proposal to constrain the amount of development in the AONB, and Hungerford in particular, is likely to have significant social and economic impacts. Whilst it is more than likely that meeting the housing need in full would challenge the overarching objectives of the AONB to conserve and enhance the special landscape, *a more balanced approach to meeting the three strands of sustainable development is needed, including the social element that Aecom's evidence highlighted was so important. This would be in keeping with the spatial strategy for the AONB (Policy SP2), which recognises that development is required in the AONB to support its local communities and rural economy.*

4.0 Meeting the housing requirement

- 4.1 We have reviewed the proposed development strategy and have identified areas of concern its effectiveness to deliver the housing requirement over the plan period.
- 4.2 The LPR identifies several sources of housing supply across the plan period at Table 2 of the Plan. These include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the Local Plan Review and Neighbourhood Plans.
- 4.3 In terms of existing allocations, the history of some of these sites identified in the supply that do not currently have planning permission (around 95 units, excluding Sandleford Park West) or only have outline permission (392 units, excluding Sandleford Park East) or where a site's delivery has been continually delayed clearly does not support confidence in their timely delivery. As such, it is considered that a 10% non-implementation rate is factored in to, at least, some of this supply would provide a more robust strategy.
- 4.4 In terms of non-allocated sites with planning permission, Table 2 shows that nearly 1,958 dwellings are provided on un-allocated sites (including prior approvals) with planning permission. Again, a 10% non-implementation rate would provide a more robust strategy as it is unlikely that all these permissions will be delivered over the plan period, for various reasons, potentially including changing constraints (such as the phosphates issue in the Lambourn catchment).

Windfall allowance

- 4.5 The housing supply includes a windfall allowance of 1,949 dwellings (or 26.6% of the total housing supply) up to 2039. It has been based on the average annual delivery on small sites of less than 10 units (excluding prior approvals for permitted development) between 2006 – 2022.
- 4.6 In the context of the latest consultation on the revised NPPF and the Levelling Up and Regeneration Bill also place a greater emphasis and need to provide a genuinely plan-led system, we consider that the LPR would be more effective if it relied less significantly on this level of unplanned development. A more positively planned approach would help to ensure greater deliver of affordable homes, noting that small windfall sites are generally less able to deliver this and over reliance on them risks exacerbating the affordability issues in the district and failing to deliver on a key priority of the plan (as discussed above).

- 4.7 The Council contend that past delivery of windfalls has been consistent and reliable. The Council has not provided any evidence however about future supply to justify such an approach.
- 4.8 There also appears to be a recent trend that yield from windfalls are reducing on small sites. As set out at Table 3.1 of the Housing Background Paper the delivery over the last three years 2019/20 to 2021/22 has reduced to an annual average of 97 completions. Indeed, in the last five years the annual average is also only 112 completions, notably lower than LPRs anticipation of 140 dpa. What evidence is there to give confidence that the rates will increase over the plan period?
- 4.9 In addition, it is also worth noting the windfall allowance is taken from smaller sites (i.e. less than 10 new homes) and, therefore, a reliance on sites for potentially between 1-4 dwellings in the housing supply will not deliver any affordable housing and further exacerbate affordable housing need within West Berkshire, contrary to the LPR's priority to improve affordability of housing for its existing and future residents.
- 4.10 The implications of this are important. Even a relatively modest but more realistic reduction in the windfall allowance from 140 to 100 dpa would reduce immediately the total housing supply by, at least, 549 dwellings.
- 4.11 A more robust and effective alternative is to take forward more of the available and suitable sites from the HELAA. This will reduce the reliance on windfall sites and provide greater certainty of supply in a positively-planned way.

New allocations

Sandleford Park (as allocated at Policies SP13 and SP16)

- 4.12 The HBP, at Appendix 2, sets out the housing trajectory including the phasing of individual sites.
- 4.13 The Council contends that Sandleford East (which benefits from outline planning permission) will begin delivering 100 dpa from 2025/26 through to 2034/35, with 80 dwellings provided during the year 2035/36.
- 4.14 This appears to be an optimistic timetable, particularly given the previous planning delays with the site (allocated in 2012), that we understand a reserved matters application has yet

to be submitted for any phase(s) and the need to address several planning conditions prior to commencement of construction. The start date of 2025/26 for first completions therefore seems very much a 'best case scenario'.

- 4.15 It is understood that the site is being delivered by a single housebuilder. This therefore could lead to a lower absorption rate due to lack of variety of housing product in accordance with the findings of Letwin's Independent Review of Build Out (October 2018). The 100 dpa across the plan period therefore is likely to be impractical and affect site delivery over the plan period.
- 4.16 With regards to Sandleford West, this site does not have any planning permission despite an outline application being submitted in April 2018. It appears that the Council are awaiting an amended package of information and revised plans. Therefore, first completions in 2027/8 is simply conjecture. There will also be a need to submit and agree reserved matters and address conditions ahead of that time.
- 4.17 With the above in mind, it is considered that the Council should take a more cautious approach with the delivery of Sandleford Park during the plan period. The Regulation 18 Consultation noted that Sandleford Park was expected to deliver 1,000 dwellings across the plan period. This seems a more robust figure than the 1,580 dwellings now proposed, and a more realistic basis for the LPR's development strategy.

North East Thatcham (as allocated at Policies SP13 and SP17)

- 4.18 The Council has reduced the delivery of NE Thatcham from a total of 2,500 dwellings to 1,500 dwellings. Notwithstanding this, the Council anticipate that NE Thatcham will deliver 1,500 homes over the plan period (compared to 1,250 dwellings expected at the Regulation 18 stage). For reasons we discuss below, this appears to be unjustified.

The justification for NE Thatcham

- 4.19 The supporting evidence base for NE Thatcham - including the Thatcham Strategic Growth Study (which includes a Vision and Concept Plan) - still refer to the delivery of 2,500 homes and has not been updated to reflect the position in the current version of the LPR. This also includes the Viability Testing which tested 2,300-2,500 new homes. This work would need to be updated for any Plan to be found sound.

- 4.20 The site allocation policy also still refers to the delivery of the secondary school. However, there is no updated viability appraisal to confirm that this is deliverable for a site of 1,500 new homes in total. This raises the following concerns:
- The Thatcham Growth Study (Stage 3) acknowledges that strategic development at this scale (i.e. 2 500 new homes) is the only approach that is likely to deliver an additional secondary school for the town, without which any growth would cause issues in provision.
 - Again, the Thatcham Growth Study (Stage 3) notes that the scale of development (i.e. 2,500 new homes) would not create the need for a secondary school development on its own and, therefore, is only half-funded by developer contribution. A reduction to 1,500 new homes is therefore likely to increase this funding gap further, with no indication of how this additional funding will be resolved.
 - A secondary school would internalise a significant number of trips from the proposed development. Indeed, the Access and Movement Report for NE Thatcham in the Thatcham Growth Study (Stage 3) assumes that the secondary school will have 50% internal trips. Therefore, with question marks over the potential delivery of a secondary school for a site of 1,500 new homes, the sustainability credentials of NE Thatcham are uncertain.
- 4.21 As a result, the identification of NE Thatcham lacks evidence to support the allocation of for 1,500 new homes. In particular, the lack of delivery of a secondary school and reduction in housing numbers would take away the key justification for growth at this location to help deliver new education provision and additional community infrastructure. The SA/SEA, at Appendix 4, acknowledges this but the Council still proceed on this basis as it is considered that 2,500 new homes in Thatcham is too many.
- 4.22 There is a confused picture in the evidence base. We note the publication of the West Berkshire Strategic Vision (November 2022), which is explained to be a response to paragraph 22 of the NPPF (requiring local plans to look beyond the plan period where they include larger scale developments).
- 4.23 This evidence suggests that there remains intention for a much larger development at NE Thatcham than the 1,500 homes now included in the LPR. The settlement boundary

amendments, and site boundaries identified in the LPR¹⁴, are unchanged from Regulation 18, gives clear indication that a more substantial development is planned for¹⁵.

- 4.24 The LPR, however, makes no reference to this strategic vision. In which case, there is a potential conflict with national policy (specifically NPPF 22).
- 4.25 We also note that, whilst the vision has been subject of targeted stakeholder consultation, it has not been published for public consultation as part of the Draft LPR at Regulation 18 stage.

Scale and timescales for Housing Delivery

- 4.26 Notwithstanding the above, the Council's assumptions on the expected housing supply from NE Thatcham are also clearly unreasonable.
- 4.27 The Housing Background Paper demonstrates that the Council expect NE Thatcham to start delivering 150 dpa from 2029/30 to 2038/2039. On the face of it, this appears to be overly optimistic¹⁶.
- 4.28 The market evidence demonstrates that for schemes of 1,500 dwellings, the lead-in time from validation of an application through to first completions is approximately 7 years (Source: Lichfield's Start to Finish (2nd Edition), dated February 2020). As such, given the timescales for the adoption of the Plan (i.e. late 2024 in the LDS) and taking a view that the planning application for this site is submitted by the end of 2024/2025, first completions cannot be projected before 2031/2032. This timescale may be optimistic given there is a need to prepare and agree to a coherent masterplan or development framework, and if, for example, prior mineral extraction is required and/or there are delays to the adoption of the Plan.
- 4.29 As noted with the delays with Sandleford Park, and its need for a Secretary of State decision, delivery of strategic allocations is challenging.
- 4.30 Furthermore, market evidence suggests that for sites of 1,500, a realistic average annual build out rate is c.100-120 dpa (Source: Lichfield's Start to Finish (2nd Edition)). As such, delivering completions from 2031/32 at 120 dpa would therefore equate to, at best, 960 dwellings over the plan period. A shortfall of 540 dwellings.

¹⁴ Policy SP17: NE Thatcham [map] (page 74)

¹⁵ Settlement Boundary Review (December 2022); Map 45 (dated March 2021)

¹⁶ The Strategic Vision 2050 is even more ambitious/unrealistic by assuming first completions by winter 2026 (and assuming an outline planning application this spring)

4.31 In conclusion on the matter of meeting the housing requirement, we consider that the LPR is unsound as it:

- Does not provide sufficient contingency for non-delivery of currently extant planning permissions;
- Relies heavily on windfall sites, when there are many alternative available sites identified in the HELAA;
- Is unrealistic in its assumptions about delivery rates at the strategic allocations;
- Lacks a vision for strategic development beyond the plan period.

4.32 If found unsound on these points, the remedy is to revisit the HELAA and engage with the promoters and other stakeholders to bring forward more of the most suitable sites for development.

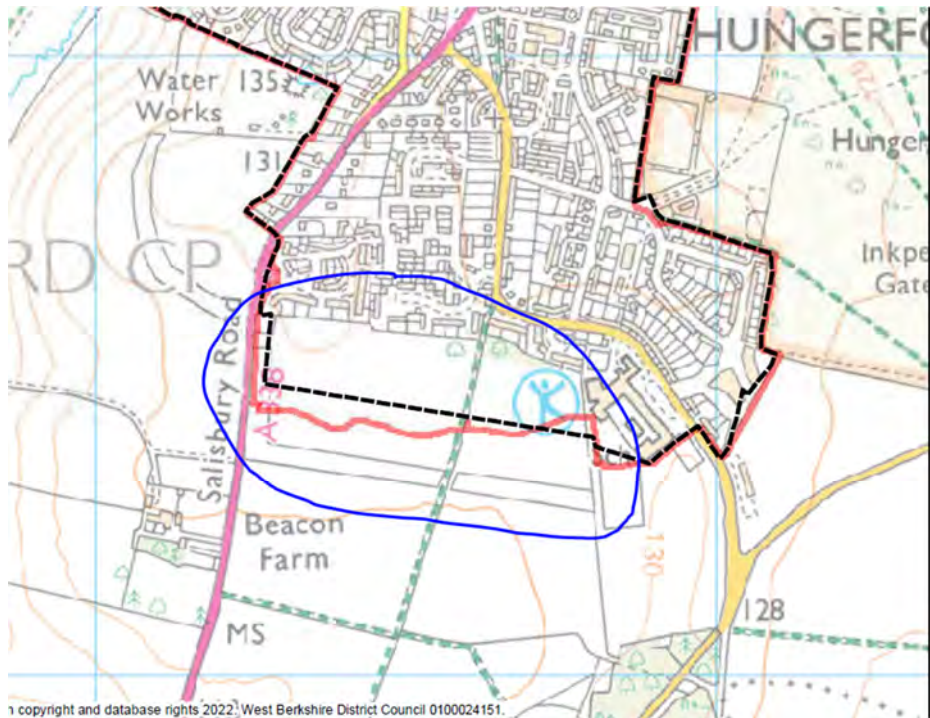
5.0 Settlement boundary review

- 5.1 We also wish to comment on the Settlement Boundary Review¹⁷, undertaken as part of the LPR.
- 5.2 On a procedural point, we note that the proposed changes to the settlement boundaries were not subject to public consultation at Regulation 18 stage, but consultation was limited to local representatives (Parish Councils and Neighbourhood Plan Groups). We have therefore not had opportunity to comment on how the Council has applied the criteria to settlements and specific contexts and would have wished to have done so prior to Regulation 19 stage.
- 5.3 The settlement boundary map for Hungerford (Map 30; previously Map 29) shows a proposed amendment on the southern part of the town. The proposed change appears to represent the new residential development that was previously allocated in the development plans as site HSA18.
- 5.4 In terms of the review criteria, the SBR explains that “boundaries will usually follow clearly defined features such as walls, hedgerows, railway lines and roads”¹⁸.
- 5.5 Noting this criteria, and the Town Council’s preference for directing the housing requirement, either all or in part, to site HUN14 (which covers this part of the town), it would be logical and positive plan making to amend the boundary to include all of the remainder of this field, i.e. up to the well-established, treelined hedge boundary that contains the field, and provides a strong, defensible boundary.
- 5.6 We note that Town Council’s response to the closed consultation was to align the boundary with the planning permission for land South of Priory Road¹⁹. By contrast, this does not provide a strong defensible boundary, and follows no obvious physical features on the ground. We contend that the logical boundary, consistent with the review criteria, is to align it as we have described.
- 5.7 The area in question is identified in blue mark-up on the following extract of Map 30:

¹⁷ Settlement Boundary Review (SBR) December 2022

¹⁸ SBR Appendix 1

¹⁹ SBR Appendix 2



5.8

Appendix A – South Oxfordshire Local Plan (Policy H4)

Policy H4: Housing in the Larger Villages

1. A housing requirement of 257 homes will be collectively delivered through Neighbourhood Development Plans and Local Plan site allocations at the Larger Villages as follows:
 - 46 homes at Nettlebed
 - 96 homes at Sonning Common
 - 115 homes at Woodcote
2. If a Neighbourhood Development Plan has not adequately progressed with allocating sites* to meet these requirements within 12 months of adoption of this Local Plan, planning applications for housing in that Larger Village will be supported provided that proposals comply with the remainder of the policies in this Development Plan.

* the Plan has reached submission stage and has allocated sufficient housing sites.

This policy contributes towards achieving objectives 1, 2, 3, 4, 5, 6 & 7.

Neighbourhood Planning

4.32 The Council strongly advocates neighbourhood planning and offers a range of support to neighbourhood planning groups. The Council firmly believe that Neighbourhood Development Plans have been proven to be an innovative and appropriate way to manage development at a local level. There has been great success in the district with preparing Neighbourhood Development Plans, and the Council is confident that this success will continue and that local led growth will support the overall spatial strategy of the Local Plan. In the event that a Neighbourhood Development Plan does not adequately progress with allocating site(s) for housing, the Local Plan has built in contingency measures.



Appendix B – Hungerford Housing Needs Assessment (HNA), Aecom (April 2019)

Hungerford Housing Needs Assessment (HNA)

APRIL 2019

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
1	January 2019	Draft	PA	Paul Avery	Housing Research Consultant
2	February 2019	Technical review	SJW	Stuart Woodin	Technical Director
3	March 2019	Locality review	FS	Francis Shaw	Neighbourhood Planning Programme Manager
4	April 2019	Final report	PA	Paul Avery	Housing Research Consultant

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Table of Contents

1.	Executive summary.....	6
2.	Context	9
2.1	Local context	9
2.2	Planning policy context	10
3.	Approach	13
3.1	Research questions	13
3.2	Relevant data	13
3.2.1	The Local Authority evidence base	13
3.2.2	Other relevant data	14
4.	RQ 1 Quantity	15
4.1	Standard method	16
4.2	Latest LPA planning strategy	16
4.3	Past dwelling completions	18
5.	Market signals.....	19
5.1	Employment and commuting	19
5.2	Migration	21
5.3	Housing market (prices).....	21
5.4	Housing market (transactions).....	24
5.5	Rate of development.....	26
5.6	Overcrowding and concealment	26
5.7	Conclusions	27
5.8	Local Authority	28
6.	RQ 3. Type and size	29
6.1	Background and definitions	29
6.2	Existing types and sizes	30
6.3	Household composition and age structure.....	31
6.4	Current patterns of occupation	35
6.5	Dwelling mix determined by life-stage modelling	37
6.6	Adjustment for downsizing	40
6.7	Type	43
6.8	Conclusions	43
7.	RQ 3. Tenure.....	45
7.1	Background and definitions	45
7.2	Current tenure profile.....	45
7.3	What quantity of Affordable Housing is required in the NA over the Plan period?	46
7.4	Affordability.....	48
7.4.1	Income.....	48
7.4.2	Market housing	48
7.4.3	Affordable Housing	50
7.5	Conclusion.....	55
8.	RQ 4. Specialist housing.....	56
8.1	Current supply of specialist housing for older people in Hungerford.....	56
8.2	Future needs for specialist housing for older people in Hungerford.....	56
9.	Conclusions	60
9.1	Overview.....	60
9.2	Recommendations for next steps	62
	Appendix A : Glossary	63
	Appendix B : Group comments	70

List of acronyms used in the text:

AH	Affordable Housing (NPPF definition)
AMH	Affordable Market Housing
AONB	Area of Outstanding Natural Beauty
GT	Gypsy & Traveller
GTAA	Gypsy and Traveller Accommodation Assessment
HNA	Housing Needs Assessment
HNF	Housing Needs Figure
HRP	Household Reference Person
HTC	Hungerford Town Council
LHN	Local Housing Need
LPA	Local Planning Authority
MHCLG	Ministry of Housing, Communities and Local Government (formerly DCLG)
NP	Neighbourhood Plan
NA	Neighbourhood Plan Area
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PRS	Private Rented Sector
SDR	Statistical Data Return
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
WBDC	West Berkshire District Council

1. Executive summary

1. This report provides Hungerford Town Council (HTC) with information regarding the mix of housing they should plan for in the future. This information can be used to inform debate, and can bolster local understanding of the appropriate course of action to be taken as well as provide justification for site allocations and site mix policies. This report was produced using reputable sources with the most recent data available and accepted ways of analysing such data.
2. The report examines:
 - What quantity of new housing in the Neighbourhood Plan Area (NA) is appropriate over the Plan period;
 - What mix of types and sizes of dwellings should be provided;
 - How much Affordable Housing (AH) is needed, and what tenures are within reach of those on average incomes; and
 - What provision of specialist housing for the elderly is required.

Quantity

3. The Housing Needs Figure (HNF) for Hungerford is 27 net additional dwellings per year, which equates to a total of 486 over the Plan period 2018-2036.
4. This figure has been derived from the Local Housing Need (LHN) of the District in line with the methodological requirements of West Berkshire District Council (WBDC) and the spatial strategy of WBDC's Core Strategy policies. This policy context also requires settlements located within the North Wessex Downs Area of Natural Beauty (AONB) to be treated differently from the rest of the District. The Core Strategy housing target for the AONB is a maximum, and is dependent on the supply of suitable sites: if an insufficient supply of suitable sites comes forward, the shortfall may be shared with neighbouring settlements outside of the AONB. Hungerford's HNF should be in proportion with this element of the spatial strategy and should therefore also be seen as an upper-bound target that is subject to the supply of suitable sites.

Market signals

5. No material uplift has been applied to the HNF as the result of a market signals analysis, although the following trends were observed:
 - Hungerford is home to an economically active population. It attracts and retains residents who work in relatively distant locations, including London and particularly Newbury – which is undergoing economically strategic regeneration. Employment opportunity is likely to continue to grow as a key driver of housing demand in Hungerford;
 - House prices in Hungerford have risen moderately over the last ten years, demonstrating that demand remains robust but is not strongly increasing. Prices are generally lower and rising less quickly than those in the wider postcode area and District. Price growth over time diverges significantly between different types and sizes of property, suggesting that segments of the market possess more momentum than others;
 - The volume of housing sales in Hungerford has decreased every year since 2014, suggesting that demand is waning. Yet despite this sustained decrease, sales volumes remain higher than any year during the 2008-2013 peak. Transaction volumes are also drastically different for different dwelling types, with a disproportionately high level of demand for terraced homes and a significant decrease in demand for semi-detached homes;
 - Overcrowding is low and falling in Hungerford, and although there were 21 concealed families at the time of the last census, they represent a very small proportion of the overall population that is lower than the proportion found at the District and national levels;
 - International migration appears to exert no demand pressure on housing in Hungerford;
 - There is presently no evidence of a shortfall of housing delivery in the District that would significantly affect Hungerford's targets.

Type and size

6. Hungerford's stock of existing housing is made up of smaller dwellings than that of the wider District. There are higher proportions of terraced houses and flats in Hungerford than West Berkshire, and a lower proportion of detached houses. Accordingly, 38% of Hungerford households occupy dwellings of four rooms or fewer, compared with 26% in West Berkshire. In terms of bedrooms, Hungerford households are 27% more likely to live in one to two-bedroom dwellings than their counterparts in the wider District, and 41% less likely to live in dwellings of five bedrooms or more.

7. The housing profile reflects the composition of households at NA and District levels: Hungerford has a much higher proportion of one-person households, while West Berkshire has a higher proportion of families with dependent children (features that are evident overall, and within every age category). Hungerford has a higher share of older residents, while West Berkshire has a higher proportion of younger ones. Hungerford's share of households aged 65 and over increased at twice the rate of West Berkshire's over the intercensal period, and the population of 16-44 year olds declined.
8. Having established this context, we gathered data on the projected population of the District by age, as well as the propensity of households in particular age bands to occupy particular sizes of dwelling. Applying this information to the demographic profile of Hungerford itself affords a reasonable estimate of the age structure of the town at the end of the Plan period, and the sizes of dwellings that its future population are likely to want to occupy.
9. Hungerford's demographic profile in 2036 is likely to be dominated by households aged 65 and over (which make up 48% of all households), followed by those aged 35 to 54 (28%), those aged 55 to 64 (15%), and the combined categories aged below 34 (9%). Generally speaking, the age bands most likely to occupy larger dwellings are strongly represented, and those most likely to occupy smaller dwellings are not well represented. Although households aged 65 and over have begun to shift towards mid-sized dwellings, they still occupy dwellings of four or more bedrooms at twice the rate of households aged 25 to 34.
10. Given that Hungerford's current dwelling stock is made up of smaller dwellings compared with the District, and that the town's projected population is likely to wish to inhabit larger dwellings, it is logical that the recommended dwelling mix at the end of the Plan period is skewed towards the provision of three- and four-bedroom homes.
11. However, a further analysis has been undertaken to adjust for the limitations of the data relating to the occupation patterns of the district, where the available stock of housing is insufficient to permit downsizing by older households at the rates seen elsewhere and expressed in various studies.
12. This additional analysis produces a dwelling mix that is far more balanced and less weighted towards larger dwellings. This dwelling mix is closer to what should be provided in Hungerford in order to permit older households in larger dwellings to downsize, and has the additional benefit of allowing newly forming households to access housing through smaller and more affordable dwellings.
13. Hungerford's ageing population also offers a chance to listen closely to local needs and further amend the planned dwelling mix if it is discovered that more households would like to downsize in future than is suggested by the occupation preferences evident at the District level.

Tenure

14. We have estimated that no less than 489 Hungerford households are currently unable to access market housing, and that a further 95 households will be in need of AH over the plan period.
15. It should be noted that this number is largely dependent on information provided by West Berkshire District Council (WBDC) about their Common Housing Register. As that data cannot be broken down by priority banding, and includes those not living in Hungerford but wishing to do so, it is likely an inflated total. In turn the total AH need for Hungerford may be somewhat lower than the 584 dwellings identified in this report.
16. If Hungerford's Housing Needs Figure of 486 dwellings is provided over the Plan period in accordance with the Core Strategy's CS6 affordable housing policy,¹ a total of 148 AH units (rounded) and 345 market units will be delivered. This is deemed not to meet the needs of the population for AH.
17. There is a severe lack of suitably affordable housing for the population of Hungerford, and every effort should be made to maximise AH provision going forward, while ensuring that overly ambitious targets do not imperil the viability of new development in general. It may also be possible that other types of tenure may be able to alleviate the need for AH in Hungerford.
18. Hungerford has an incidence of home ownership that is slightly above the national average, but lower than the wider District, while the proportion of households renting privately is significantly higher than the District, and the proportion renting socially is slightly higher than the District. Over the intercensal period, the frequency of ownership and shared ownership decreased, while the frequency of private and social renting increased.
19. Although average annual net household incomes before housing costs are relatively high at £35,900, this level of income is insufficient to occupy the majority of dwelling tenures according to our affordability analysis.

¹ With the majority of sites being required to deliver 30% AH, the site east of Salisbury road in Hungerford required to deliver 40% AH of its 100 units, and smaller sites bringing forward lower percentages of AH – roughly averaging 30% overall.

20. Given the 90.5% growth in private renting between 2001-2011, it is likely that the provision of this tenure is growing to meet demand from those priced out of ownership, as average market rental properties require a lower income level than do entry-level market properties for sale. Entry-level market renting is only just out of reach for the average earning household, and so may be able to meet the needs of some households if the supply of dwellings for market rent increases in step with demand.
21. However, shared ownership at a 25% share is attainable to those on average incomes. In light of the reduction of households occupying this tenure over the intercensal period, it should be considered whether increasing the supply of shared ownership properties would help to reduce affordability pressures for many households.
22. Delivering more affordable houses to be sold would also reduce pressure on the Private Rented Sector (PRS) in Hungerford, which is becoming a more popular option over time, but which at average rents is out of reach for many households.
23. On the basis of the evidence we have gathered, the following split of AH tenures is put forward: 70% Social and Affordable Rent; and 30% affordable routes to home ownership, broken down to 40% Social Rent, 30% Affordable Rent, 20% shared ownership, and 10% Starter Homes.

Specialist housing

24. Hungerford has a relatively high provision of specialist housing for older people relative to the size of its elderly population. However, it is often the case that the stock in towns must serve the catchment area of surrounding villages, so provision in Hungerford should seek to exceed the level of demand expected for its own population where possible.
25. Of Hungerford's projected 2036 population, nearly 20% are estimated to be aged 75 and over, which equates to 1,238 people – and an increase of 687 since the last census. The current provision of specialist accommodation is not sufficient to meet the needs of the projected elderly population. We have calculated that Hungerford should therefore plan to deliver an additional 110 bed spaces over the Plan period.
26. Using a model created by the Housing Learning and Improvement Network (HLIN) detailing the proportion of different tenures required within older people's housing, and with reference to imbalances in the existing stock, we recommend that 26 of the new units be affordable retirement units, 53 market retirement units, and 31 market units with care.

2. Context

2.1 Local context

27. Hungerford is a town and a civil parish on the western edge of the District of West Berkshire, bordering Wiltshire, which is also the divide between the South East and South West regions of England. In addition to the town itself, the parish boundary includes the small village of Hungerford Newtown and the hamlet of Eddington.
28. The rivers Dun and Kennet, as well as the Kennet and Avon Canal, pass through Hungerford, and the town sits entirely within the North Wessex Downs Area of Outstanding Natural Beauty (AONB).
29. The amenities of Hungerford town centre are predominantly sited on the High Street (A338), which is oriented broadly north to south. The A338 is crossed at Eddington by the A4, which provides road access to Hungerford's two nearest major settlements: Newbury to the east and Marlborough to the west.
30. Hungerford railway station, on the Reading to Taunton line, provides rail access to Newbury, Reading and London. In addition to Hungerford's proximity to junction 14 of the M4, its rail connections put Hungerford within convenient reach of a range of employment opportunities and make it a popular commuter settlement.
31. West Berkshire Council (WBC) designated Hungerford as a Neighbourhood Plan area (NA) in April 2018. The boundary of the NA is shown in Figure 2-1 below.

Figure 2-1: Hungerford Parish Neighbourhood Plan area



Source: Hungerford Neighbourhood Plan Area Designation Notice

2.2 Planning policy context

32. In line with the basic conditions² of Neighbourhood Planning, Neighbourhood Development Plans (NDPs) are required to be in general conformity with adopted strategic local policies. Consequently, there is a requirement for the relevant Local Plan documents to be reviewed as part of this HNA.
33. The West Berkshire Core Strategy was adopted in July 2012 and covers the period 2006-2026. This Development Plan Document provides the most up-to-date policy framework for the District, though it is supplemented by policies contained in other documents. Those with relevance to this HNA are the Housing Site Allocations Development Plan Document, adopted in May 2017, and the policies saved from the West Berkshire District Local Plan 1991-2006, which are set out in the Saved Policies 2007 document, last updated in May 2017.
34. A West Berkshire Local Plan to 2036 update document is currently undergoing a two-year period of preparation and public participation prior to its scheduled adoption in November 2020. The Scoping Report for the Local Plan Review states that the "policy approach to the delivery of housing [is] to be updated in the light of the evidence from the Berkshire (including South Bucks) Strategic Housing Market Assessment (2016) . . . and any amendment to national policy regarding the assessment of housing need."
35. This suggests that housing policy for West Berkshire may well change when the Local Plan to 2036 is adopted. However, as no emerging policies have yet been produced, and the Scoping Report gives only an indication of the intention for how each specific policy could be updated, those intentions will be acknowledged but not bear significant weight in this HNA.
36. In any case, for the majority of the individual existing policies reviewed here, it is stated that the "principles of the policy are anticipated to be carried forward into the Local Plan to 2036", and this includes all site allocations. Any exceptions are noted alongside the existing policies described below.

Policies in the adopted West Berkshire Core Strategy 2006-2026

37. **Policy CS1: Delivering New Homes and Retaining the Housing Stock** – makes provision for the delivery of at least 10,500 net additional dwellings over the Plan period, appropriately phased and managed to ensure that a minimum of 525 dwellings are delivered per annum and a rolling five-year supply of housing land is maintained.
38. This policy fulfils the Core Strategy's second strategic objective, to provide effective and timely housing growth that maximises access to services and the efficient use of suitable land while responding appropriately to the existing built environment.
39. The policy is also in conformity with the Regional Spatial Strategy for the South East, adopted in 2009, which provided this housing target for the District.
40. The Housing Site Allocations Development Plan Document, adopted in May 2017, acknowledges that the Berkshire SHMA "has identified an objectively assessed need figure of 665 dwellings per annum over the period 2013-2036", which is greater than the annual target of 525 outlined in this policy. However, it continues, the SHMA figure "does not translate directly into a housing requirement for the District due to the need to take into account factors such as environmental constraints and the Duty to Cooperate" and "what the future requirement should be, will be considered as part of the preparation of the new Local Plan." It is therefore appropriate to continue to use the Core Strategy target until such time as the Local Plan to 2036 is adopted.
41. **Area Delivery Plan Policy 1: Spatial Strategy** – outlines the spatial strategy of the Core Strategy, which performs two functions.
42. First, it divides the District into four distinct spatial areas, each of which is supplied with its own housing target in the policies to follow. A summary of these targets, which add up to the overall District target of 10,500, is given in Table 2-1: West Berkshire spatial strategy below. Hungerford falls within the North Wessex Downs AONB spatial area.

Table 2-1: West Berkshire spatial strategy

Spatial area	Housing target
Newbury and Thatcham	6,300 (of which 5,400 Newbury and 900 Thatcham)
Eastern Area	1,400
North Wessex Downs AONB	2,000
East Kennet Valley	800

Source: West Berkshire Core Strategy 2006-2026

² See Glossary

43. Second, it establishes a hierarchy of settlements within the District with regard to the amount of future development they are expected to deliver, though specific housing targets or proportions are not given. This is reproduced in Figure 2-2 below. Hungerford is classified as a rural service centre.

Figure 2-2: District settlement hierarchy

District Settlement Hierarchy		
Urban Areas	Wide range of services and the focus for the majority of development	Newbury, Thatcham, Eastern Urban Area (Tilehurst, Calcot and Purley on Thames)
Rural Service Centres	Range of services and reasonable public transport provision - opportunities to strengthen role in meeting requirements of surrounding communities	Burghfield Common, Hungerford, Lambourn, Mortimer, Pangbourne, Theale
Service Villages	More limited range of services and some limited development potential	Aldermaston, Bradfield Southend, Chieveley, Cold Ash, Compton, Great Shefford, Hermitage, Kintbury, Woolhampton

Below the settlement hierarchy there are two additional types of area where there will be more limited development, including affordable housing for local needs:

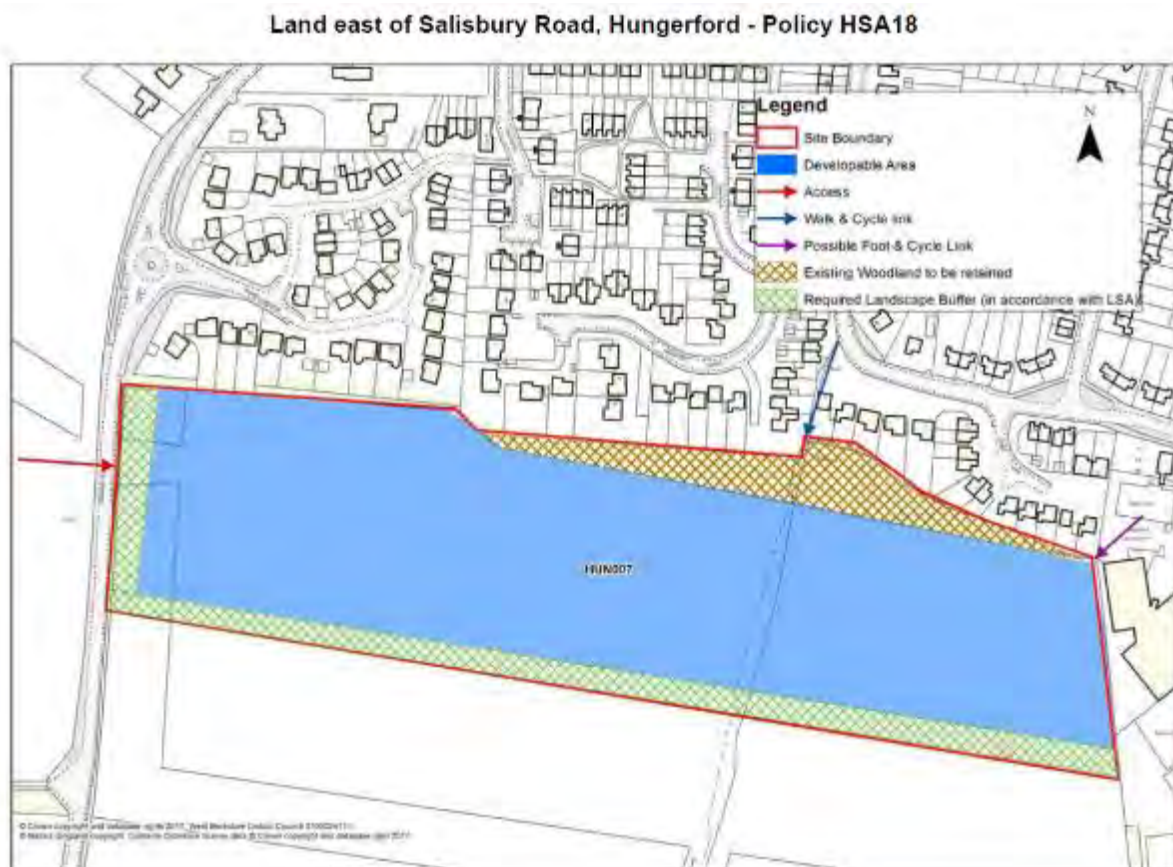
- smaller villages with settlement boundaries - suitable only for limited infill development subject to the character and form of the settlement,
- open countryside - only appropriate limited development in the countryside will be allowed, focused on addressing identified needs and maintaining a strong rural economy.

Source: West Berkshire Core Strategy 2006-2026

44. **Area Delivery Plan Policy 5: North Wessex Downs Area of Outstanding Natural Beauty** – provides a specific housing target of up to 2,000 dwellings for the area of the District in which Hungerford is situated, noting that more than half have already been built or received planning permission.
45. Because this spatial area is within a designated AONB the policy specifies that if there are insufficient developable sites to meet this target while adhering to the landscape priority of the policy, any shortfall will be provided on sites allocated in other spatial areas.
46. It is also stated that “in the western part of the AONB, development will be focused in Hungerford as the more sustainable rural service centre. Hungerford is considerably larger than Lambourn and performs a more significant function for a large catchment area. Hungerford town centre is defined as one of only two town centres in the District, reflecting the range of goods and services which it provides for the surrounding area.”
47. Note that the Scoping Document for the Local Plan Review to 2036 declares an intention to, “consider whether the current spatial strategy for the district is the most appropriate up to 2036”, indicating that it is possible that the concept of the four spatial areas could be abandoned or altered in future.
48. **Policy CS4: Housing Type and Mix** – requires that forthcoming residential development be composed of a mix of dwelling types and sizes suited to the needs of all segments of the community. The mix delivered on an individual site should have regard to issues of character, accessibility, local services, and evidence of local housing need.
49. The explanation in paragraph 5.20 adds that this includes types of housing for those with specialised needs.
50. This policy, in combination with CS6 (below), fulfils the Core Strategy’s third strategic objective, to provide homes in a way that promotes sustainable communities and responds to the changing demographic profile of the District.
51. **Policy CS6 Provision of Affordable Housing** – requires the following minimum levels of affordable housing provision:
- 40% on greenfield sites of more than 15 dwellings or 0.5 hectares

- 30% on previously developed sites of more than 15 dwellings or 0.5 hectares
 - 30% on sites of 10-14 dwellings
 - 20% on sites of 5-9 dwellings
52. The policy proposes a flexible target for a tenure split of 70% social rented and 30% intermediate affordable units, but local need and site specifics will be taken into consideration
53. The minimum requirements and tenure split are subject to negotiation around development viability.
54. The policy explanation (para 5.31) states that an overall target of 35% affordable housing will be sought, equating to an average of 184 units per annum.
55. Note that the Local Plan Review to 2036 states that “policy approach to the delivery of affordable housing [is] to be updated in the light of the written Ministerial Statement, the content of the White Paper and any subsequent amendments to national policy and/or local evidence.”
56. **Policy HAS 18: Land east of Salisbury Road, Hungerford (site reference HUN007)** – provides for approximately 100 dwellings, composed of a mix of dwelling types and sizes. The settlement boundary has been re-drawn to reflect this addition, and this is the only site allocation for Hungerford. A map showing its location is reproduced in Figure 2-3 below.

Figure 2-3: Hungerford site allocation HUN007



Source: West Berkshire Core Strategy 2006-2026

3. Approach

3.1 Research questions

57. Below we set out the research questions relevant to this study, as discussed and agreed with Hungerford Town Council (HTC). Research Questions, abbreviated to 'RQ,' are arrived at the start of the project through discussion with the parish. They serve to direct our research and provide the structure for the HNA.

Quantity

58. The emerging West Berkshire Local Plan is currently under development and no specific housing target has been set by the Local Authority for Hungerford. Therefore, it is necessary to investigate the quantity of housing needed over the Plan period.
59. *RQ1: What quantity of Housing in the Neighbourhood Plan Area (NA) is appropriate over the Plan period?*

Type and size

60. HTC note that the type of housing is also an issue in the NA. They express a need for housing to suit the needs of elderly people in particular. Therefore the type and size of homes that is appropriate for local needs, especially for the elderly should be explored.
61. *RQ2: What type (terrace, semi, bungalows, flats and detached) and size (number of habitable rooms) of housing is appropriate?*

Tenure

62. HTC have made clear that there is a strongly perceived need for Affordable Housing (AH) in the NA. The group would like to explore the quantity needed and how it should be broken down among the various AH tenures.
63. *RQ3: What Affordable Housing and market tenures should be included in the housing mix?*

Housing for specialist groups

64. Another priority for HTC is to accommodate the needs of the elderly population. While it is clear that additional housing is needed for this demographic group, HTC wish to explore what forms of specialist housing in particular would best suit local needs.
65. *RQ4: What provision should be made for specialist housing for older people within the NA?*

3.2 Relevant data

3.2.1 The Local Authority evidence base

66. Planning Practice Guidance (PPG) states that those bringing forward a Neighbourhood Plan can refer to existing needs assessments prepared by the Local Planning authority as a starting point. As Hungerford NA is located within the District of West Berkshire, we therefore turned to the Berkshire Strategic Housing Market Assessment (SHMA), published in 2016, which covers the District and informs emerging housing policies at the local authority level, including affordable housing policy.
67. The purpose of the SHMA is to provide a strategic view of housing supply and demand in all housing sectors up to 2036 and to provide the Local Authorities with a comprehensive understanding of the dynamics and segments of the functional housing markets operating within the County of Berkshire.
68. For the purpose of this HNA we have determined that Hungerford forms part of the West Berkshire Housing Market Area (HMA) identified as a sub-area within the SHMA. The SHMA draws upon a range of data including population and demographic projections, housing market transactions and employment scenarios. As such, it contains a number of points of relevance when determining housing need within the NA.
69. This provides a strong starting point for policy development that aims to build on and add local specificity to the Local Plan by enabling a comparison to be made with Parish-level data (gathered as part of the preparation of this study), given that such an exercise reveals contrasts as well as similarities.

3.2.2 Other relevant data

70. In addition to the SHMA, we have gathered a range of other data sources to ensure our study is robust for the purposes of developing policy at the neighbourhood plan level, and is locally specific. This data includes Census data which provides information on demographic shifts.
71. Furthermore, to assess the housing in Hungerford, data from the Land Registry was analysed. This data provides prices paid, housing types and date of transaction information which allows housing market trends to be identified.
72. The material was collected for the postcodes that are contained within the NA boundary to create a database including all housing transactions registered with the Land Registry between January 1st 2008 and December 31st 2017. A similar exercise was carried out for the whole postcode area (RG17) and for the whole of West Berkshire to serve as a point of comparison. These datasets were mainly used to inform our response to RQ1 and RQ2.
73. Market rental data was collected from a range of sources including www.home.co.uk and www.rightmove.com.

4. RQ 1 Quantity

RQ1: What quantity of Housing in the Neighbourhood Plan Area (NA) is appropriate over the Plan period?

74. We have estimated the number of new dwellings that should be sought in the NA over the Plan period (the Housing Needs Figure or HNF) using a five-step approach in accordance with the latest National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
75. According to the NPPF, the HNF for a designated NA, “should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the planning authority.”³
76. An HNF is a policy-off figure, which means that it is an expression of total housing demand unconstrained by the limits of the land available to build on and by the impact of policies that either facilitate or obstruct development. A policy-off figure can then be reviewed in light of relevant Local and Neighbourhood policies and site allocations to arrive at a policy-on understanding that reflects these factors.

Step 1: “the population of the neighbourhood area”

The HNF for the NA should take as its starting point the housing target for the local authority in which it sits. The baseline for our calculation for Hungerford is therefore a share of the current LA Local Housing Need (LHN) figure that reflects the share of the LA population living in Hungerford.

In order to determine their housing targets, the NPPF requires Local Authorities to use the Standard Method. The West Berkshire Local Planning Authority have specified that the 2016-based ONS household projections should be used as the demographic dataset for calculating housing targets based on the Standard Method.⁴ This is then adjusted using the most recent affordability ratios and weighed against a potential cap.

Step 2: “most recently available planning strategy of the planning authority”

We then follow the guidance presented in the NPPF which states that the initial HNF for neighbourhood plans should reflect “the overall strategy for the pattern and scale of development and any relevant allocations,”⁵ and “the most recently available planning strategy of the local planning authority.”⁶ That means introducing LA spatial policy, housing targets, and assessments of housing need at different scales to arrive at a more locally appropriate proportion of the LA housing target that should be provided in Hungerford. This will usually be a slightly different figure to that produced in Step 1.

Step 3: dwelling completions

Next, any dwellings that have already been completed over the Plan period should be deducted from the HNF in order to provide a HNF for the remainder of the Plan period and an annual HNF that reflects past under- or over-delivery.

Step 4: “latest evidence of local housing need”

Finally, we explore the “latest evidence of local housing need” and other relevant policies and data in detail, as part of a Market Signals analysis. Following any adjustments justified by this analysis, we produce the final HNF (section 5.7).

Step 5: the Local Authority

The NPPF makes it clear the Local Authority is under a duty to provide designated neighbourhood planning areas within their district with their housing target.⁷ In arriving at this HNF, AECOM is therefore acting on behalf of the Local Authority. With this in mind, it is important that the number and underlying methodology are shared with the Local Authority to confirm it is aligned with their current planning strategy.

77. Employing this methodology, the HNF for the NA may be calculated as follows:

³ NPPF, paragraph 66, page 18

⁴ Technical consultation on updates to national planning policy and guidance, October 2018, page 10

⁵ NPPF, paragraph 65, page 18

⁶ Ibid

⁷ Ibid

4.1 Standard method

78. Firstly, we calculate the Local Housing Need (LHN) for the District using the standard method outlined in Planning Policy Guidance, before taking the population of the NA, and calculating the proportion of the total population of the District that it represents. This percentage will then be used to arrive at the share of the Local Authority's target that should be apportioned to the NA.
79. The West Berkshire LHN figure, using the standard method, is calculated as follows:
 - Step one is to set the baseline, by calculating the projected average annual household growth in the District over a 10-year period, beginning with the current year, using the most recent ONS household projections.
 - West Berkshire's 2016-based household projection for 2019, the current year, is 66,018. Its projection for 2029, the end of the 10-year period, is 70,408. This represents total growth of 4,390 households which, divided by the number of years in the period (10), gives an annual average growth rate of 439 households.
 - Step two is to adjust this annual average using the most recent ONS median workplace-based affordability ratios (released in April 2018), which provide the ratio of house prices to earnings for various geographies. For each 1% increase in the ratio above 4, projected household growth should be increased by a quarter of a percent.
 - West Berkshire's 2017 affordability ratio is 10.65. Its adjustment factor is therefore $((10.65 - 4)/4) \times 0.25$, or 0.415625. The figure arrived at in step one is then multiplied by the adjustment factor of 1.415625 to give an adjusted annual projection of 621 households (rounded).
 - Step three is to cap the level of increase at 40% above whichever is higher of: the average annual household growth figure arrived at in step one; or the average annual housing requirement figure set out in the most recently adopted local strategic housing policies.
 - The West Berkshire Core Strategy contains the latest adopted strategic housing policy. (Though it is due to be replaced by the Local Plan Review in 2020, no newer policy has yet been published). Policy CS 1 makes provision for a minimum of 10,500 net additional dwellings over the period 2006-2026. Divided by the 20 years in the Plan period, that is an annual average of 525 dwellings. 40% of 525 is 210, so 40% above the most recently adopted strategic housing policy is 735 (525 + 210) dwellings. This is a higher figure than the 439 new households calculated in step one, and would therefore be the relevant cap. However, the capped figure is higher than the adjusted household projection figure of 621, and therefore does not apply.
 - West Berkshire's LHN is therefore 621 dwellings per year.
80. Having derived West Berkshire's LHN, we now calculate Hungerford's share of that target by looking at what proportion of West Berkshire's population currently reside in Hungerford and applying that percentage to the District's LHN. At the time of the last Census, there were 5,767 people in the parish of Hungerford, or 3.7% of the 153,822 people in West Berkshire. Therefore, applying this percentage to West Berkshire's LHN gives a HNF for the NA of 23 dwellings (rounded) per annum, or 414 dwellings over the Neighbourhood Plan period, 2018-2036.

4.2 Latest LPA planning strategy

81. However, as stated in NPPF guidance, it is important to acknowledge the relevant policies in the most recently available development plan document for the District, which reflect the overall strategy for the pattern and scale of development and any relevant allocations. This requires producing a HNF for the NA that takes into account the Local Authority's spatial strategy, and therefore may differ slightly from the initial HNF calculated above.
82. In West Berkshire, the relevant document is the West Berkshire Core Strategy (2006-2026). As noted above and in the Context chapter, this is due to be replaced in 2020 by a Local Plan review, but because its policies are not in the public domain, we continue to use the Core Strategy. A key element of the spatial strategy set out in this document is the subdivision of the District into four spatial areas, each of which are allocated an appropriate housing target.
83. Hungerford falls within the North Wessex Downs Area of Outstanding Natural Beauty (AONB) spatial area, which is allocated up to 2,000 dwellings of the 10,500 allocated for the entire District over the period 2006-2026.
84. It is worth emphasising that this target is an upper-bound target, and that Area Delivery Plan Policy 5 notes that if there are insufficient developable sites to meet this target while adhering to the landscape priority of this AONB-

specific policy, any shortfall will be provided on sites allocated in other spatial areas. The HNF for Hungerford should therefore be likewise viewed as an upper-bound target dependent on the supply of suitable sites.

85. In addition to the division of the District into four spatial areas, Area Delivery Plan Policy 1 of the Core Strategy sets out a settlement hierarchy that categorises all of the settlements in the District according to their provision of services. The purpose of the settlement hierarchy is to direct development to the most appropriate and sustainable locations. It is reproduced in Table 4-1 below.

Table 4-1: District settlement hierarchy

Designation	Description	Development Role
Urban Areas	Wide range of services	The focus for the majority of development
Rural Service Centres	Range of services and reasonable public transport provision	Opportunities to strengthen role in meeting requirements of surrounding communities
Service Villages	More limited range of services	Some limited development potential

Source: West Berkshire Core Strategy 2006-2026

86. Within the AONB spatial area, there are three Rural Service Centres – including Hungerford – and six Service Villages. However, the settlement hierarchy in the Core Strategy does not specify the quantity or proportion of new housing that is expected to be delivered by settlements at each level of the hierarchy.
87. In the absence of settlement-level targets, it is necessary to derive Hungerford's share of the AONB allocation of up to 2,000 dwellings by calculating the proportion of the AONB population living in Hungerford. Relative population is considered the most appropriate proxy for any specific allocation because of the clear link Area Delivery Plan Policy 5 (which relates to the AONB spatial area) makes between the amount of future development and the current size of settlements. The policy states that, "development will be focused in Hungerford as the more sustainable service centre", noting that it is, "considerably larger" than Lambourn.
88. Table 4-2 below lists the parishes located within the AONB spatial area by their position in the settlement hierarchy, and provides their parish-level (rather than settlement-boundary level) populations as of the 2011 Census. Hungerford is the largest settlement by population, with 23% of the total population of 24,900.
89. It is important to note that there are a further 33 parishes that fall at least partly within the West Berkshire area of the AONB. However, because these are not mentioned in the settlement hierarchy, it is agreed with the Local Authority that they are not targeted for development (though they may experience windfall development by individuals). The policy states that, "smaller villages within the AONB will continue to support the needs of their residents and surrounding communities for facilities and services", rather than their needs for housing. If all of these parishes were included in the below calculation, the resulting share of the population residing in Hungerford would be so small as to disproportionately reduce its housing target, and therefore conflict with the policy intent of the settlement hierarchy, which states that "development will be focused in Hungerford".⁸

Table 4-2: Parish populations within AONB spatial area

Settlement	Population	% of total AONB population
Rural Service Centres		
Hungerford	5,767	23%
Lambourn	4,103	16%
Pangbourne	2,978	12%
Service Villages		
Bradfield/Southend	2,177	9%
Chieveley	2,890	12%
Compton	1,571	6%
Great Shefford	937	4%
Hermitage	1,943	8%
Kintbury	2,534	10%
Total	24,900	100%

Source: 2011 Census, AECOM calculations

⁸ Definitive Mapping for all parishes within the North Wessex Downs available at <http://www.northwessexdowns.org.uk/publications-resources/planning-development.html>

90. By applying the proportion of the AONB population living in Hungerford to the spatial area's housing target of 2,000, Hungerford's 'fair share' of the housing allocated to the North Wessex Downs AONB over the period of 2006-2026 is 463 dwellings (rounded).
91. As a proportion of the total West Berkshire housing target of 10,500, this is 4.4%. If we then apply this percentage to West Berkshire's LHN of 621 dwellings per year, we arrive at a HNF of 27 dwellings (rounded), or 486 dwellings over the Plan period 2018-2036.
92. In line with the spatial strategy of the District and the policy context for the AONB, this should be viewed as an upper-bound target that is dependent on the availability of suitable sites – if an insufficient supply of suitable sites comes forward, the shortfall may be shared with neighbouring settlements outside of the AONB.
93. In summary, we have taken a number of steps to produce a HNF that is more locally-specific and aligned with policy than the relatively crude measure of deriving the ratio of the entire District population living in Hungerford. This has resulted in an annual HNF that is higher by four additional dwellings per year.
94. If, when the District strategic policies are updated in 2020, the proportion of dwellings allocated to the AONB is updated, or if Hungerford is provided with an explicit HNF by the Local Authority, this figure will need to be updated.

4.3 Past dwelling completions

95. Since the Plan period begins in 2018 and no completions data for the year of 2018 is yet available, there is no need to deduct completed dwellings from the HNF.
96. PPG is clear that a policy-off figure should be separate from land availability and that future commitments should not be deducted from housing targets. However, West Berkshire Council provides data on outstanding housing commitments in Hungerford (sites for which planning has been granted but that may or may not yet be under construction) and it is worth reviewing the status of these and other potential commitments that are likely to meet Hungerford's HNF in the short term.
97. There are currently 29 outstanding dwelling commitments in the WBC data. Considering that some commitments had permission granted many years ago, it is not possible to discern which of them are likely to complete in the coming years. That said, more recent information on current planning applications points to a number of sites at advanced stages of approval or with construction underway:
 - 11/01910/FULMAJ: 13 dwellings under construction;
 - 17/00891/FULMAJ: 4 dwellings approved;
 - 17/03339/FULD: 5 dwellings under construction;
 - 18/00837/FULLEXT: 13 dwellings recommended for approval and awaiting s106 agreement;
 - 16/00787/FULD: 8 dwellings approved at appeal.
98. These 43 dwellings cannot be deducted from the HNF but if delivered will help to exceed Hungerford's annual target in the coming and subsequent year.
99. It is also important to note that in the West Berkshire Housing Site Allocations DPD, adopted in May 2017, Policy HSA 18 allocates a site east of Salisbury Road in Hungerford for a development of approximately 100 dwellings. The planning application is currently approved at matters reserved stage. If developed, this site will make a large contribution to Hungerford's housing needs. However, a site of this scale is deemed by some members of the community to be detrimental to Hungerford's development ambitions. HTC may wish to meet the town's future needs by allocating a number of smaller brownfield sites in the manner of the 43 units described above.
100. Next, we assess the initial housing needs figure of 27 dwellings per year (486 to the end of the Plan period) against market signals in the following chapter, and adjust the HNF if we find evidence of demand pressures that are specific to the NA. Note that PPG no longer requires that market signals be taken into account when calculating a HNF, but that the following analysis serves as useful context for the Neighbourhood Plan and for subsequent chapters in this HNA dealing with the type, size, and affordability of housing required.

5. Market signals

101. This study considers the following market signals that may justify either an uplift or a reduction in the need for market housing in Hungerford:

- Employment and commuting trends;
- Migration;
- Housing market (prices);
- Housing market (transaction volumes);
- Overcrowding and concealment; and
- Rate of development.

5.1 Employment and commuting

102. Local employment trends can greatly influence housing need, as employment opportunities can stimulate demand in the Plan area. It is therefore important to establish the employment sphere of influence experienced by the residents of Hungerford.

103.

104. Table 5-1 below shows how Hungerford's economic profile compares with that of the District. A higher percentage of Hungerford's population is economically active than that of West Berkshire as a whole, and significantly higher than the national average.

105. Though the proportion of full- and part-time employees is very similar to the wider District, Hungerford has more self-employed people (13.9% compared with 11.3%), marginally more unemployed people (3.4% compared with 2.9%), and fewer full-time students. Hungerford also has a very slightly higher proportion of retired people (13.2% compared with 12.6%). The economic profiles of Hungerford and West Berkshire are broadly similar, but both have a far greater proportion of economically active residents than England as a whole.

Table 5-1: Economic activity in Hungerford, 2011

Economic category		Hungerford	West Berkshire	England
Economically active	Total	77.9%	76.2%	69.9%
	Employee: Full-time	45.2%	45.6%	13.7%
	Employee: Part-time	13.9%	13.9%	38.6%
	Self-employed	13.9%	11.3%	9.8%
	Unemployed	3.4%	2.9%	4.4%
	Full-time student	1.7%	2.5%	3.4%
Economically inactive	Total	22.1%	23.8%	30.1%
	Retired	13.2%	12.6%	13.7%
	Student	1.9%	3.4%	5.8%
	Looking after home or family	3.7%	4.3%	4.4%
	Long-term sick or disabled	2.0%	2.2%	4.1%
	Other	1.3%	1.4%	2.2%

Source: ONS 2011, AECOM Calculations

106. While residents of Hungerford are more economically active than the national average, they also travel significantly further to get to work, as can be seen in

107. Table 5-2 below.

Table 5-2: Distance to work, 2011

Location of work	Hungerford	West Berkshire	England
Less than 10km	30.5%	45.3%	52.3%
10km to less than 30km	29.2%	21.0%	21.0%
30km and over	16.8%	12.2%	8.0%
Work mainly at or from home	13.5%	13.1%	10.3%
Other	10.0%	8.4%	8.5%
Average distance travelled to work	20.8km	16.9km	14.9km

Source: ONS 2011, AECOM Calculations

108. The DataShine Commute mapping tool provides a helpful additional layer of information about commuting patterns. Figure 5-1 below presents a visualisation of the work locations of Hungerford residents, with the volume of work travel to each location indicated by the thickness of the red lines.

Figure 5-1: Hungerford out-commuting patterns

Source: DataShine Commute

109. The most common work locations are within Hungerford itself and working from home. These are not represented on the map and account for much of the 30.5% of residents who work less than 10km from home. The next most common commuting destination is Newbury, 15km away from Hungerford and visible in the thick red line extending to the East in Figure 5-1. Other small towns and villages make up the remainder of the 29.2% of residents working 10km to 30km away from home. What is most notable from the map is that comparatively few Hungerford residents work in the large towns of Reading or Swindon.
110. It is therefore the economic development of Newbury more than any other work location other than Hungerford itself that is likely to exert the greatest influence on the demand for accommodation in Hungerford.
111. The Thames Valley Berkshire Strategic Economic Plan describes a number of major regeneration projects and infrastructure investments that are planned in and around Newbury. They are among the most important in the entire District and are identified as economically important, though specific job growth forecasts are not given. In addition, Newbury has recently been highlighted in the Tech Nation 2018 report as having a density of digital businesses that is the highest in the UK and 15 times the national average,⁹ suggesting that Newbury's past and anticipated employment growth is driven as much by the private sector as by its planned public works.
112. Economic and employment growth in Newbury is likely to have a beneficial effect on job opportunities for Hungerford residents. However, Newbury is also undergoing a concerted effort toward housing delivery, with large site allocations including the phased delivery of 1,500 homes at Newbury Racecourse and up to 2,000 homes at a greenfield site at

⁹ <https://technation.io/insights/report-2018/digital-tech-business/>

Sandleford to the south of the town.¹⁰ This increase in housing supply is likely to offset much of the increase in housing demand created by the town's economic development and may limit the potential for current and prospective Hungerford residents to access new jobs in Newbury.

113. On the subject of economic opportunity in Hungerford's sphere of economic influence, it is important to note that the Berkshire SHMA provides an employment growth forecast for West Berkshire over the (identical) Plan period of 2013-2036 of 12%, leading to a forecast change in the resident workforce of 10,800, and an economic-led housing need projection of 629 units per annum. This economic-led forecast is 14% greater than the demographic-led forecast of 551 units per annum, and suggests that strong projected economic growth across the District is an important driver of housing need.
114. In the Western Berkshire OAN Sensitivity Analysis, which was published in March 2018 and takes more recent evidence into account, West Berkshire is forecast to experience lower employment growth of 7,089 over the period 2016-2036, which represents an overall percentage increase of 6.46%. Though this conclusion is less compelling, it still results in an uplift to local housing need and does not materially change the adjustment proposed here.
115. Bringing the evidence together, it is clear from the census data that Hungerford residents are highly economically active, more likely to be self-employed than the national average, and willing to commute relatively large distances to work. The town is also located within a District that is forecast to experience strong employment growth, and this has been used to justify an uplift to its assessment of housing need in the Berkshire SHMA. Hungerford is heavily dependent on Newbury for employment opportunities, and while Newbury is actively planning for significant employment growth, it also aims to supply new workers with housing in and around Newbury itself. Hungerford represents a different offering to Newbury and may still provide and attract new workers who wish to live in a smaller town or more rural location. In combination, these factors point to a high degree of employment-led housing demand in and around Hungerford that justifies a moderate upwards adjustment to Hungerford's Housing Needs Figure (HNF).

5.2 Migration

- 116.
117. Table 5-3 below suggests that 92.3% of Hungerford residents were born in the UK. Of the 7.7% of residents born outside the UK, 4.8% have resided in the UK for at least 10 years. The fact that the international migration rate is low compared to the District and England, with the majority of migrants having resided in Hungerford for a significant period of time, suggests that international migration plays a limited role in influencing demand for housing in Hungerford.

Table 5-3: Place of birth and length of residence, Hungerford, 2011

Place of birth	Population breakdown		Hungerford	West Berkshire	England
Born in the UK	Total		92.3%	91.0%	86.2%
Born outside the UK	Total		7.7%	9.0%	13.8%
	EU		3.0%	3.5%	3.7%
	Other		4.7%	5.5%	9.4%
	Length of residence	Less than 2 years	0.4%	0.9%	1.8%
		2-5 years	1.2%	1.4%	2.2%
		5-10 years	1.3%	1.8%	2.9%
		10 years or more	4.8%	4.9%	7.0%

Source: ONS 2011, AECOM Calculations

5.3 Housing market (prices)

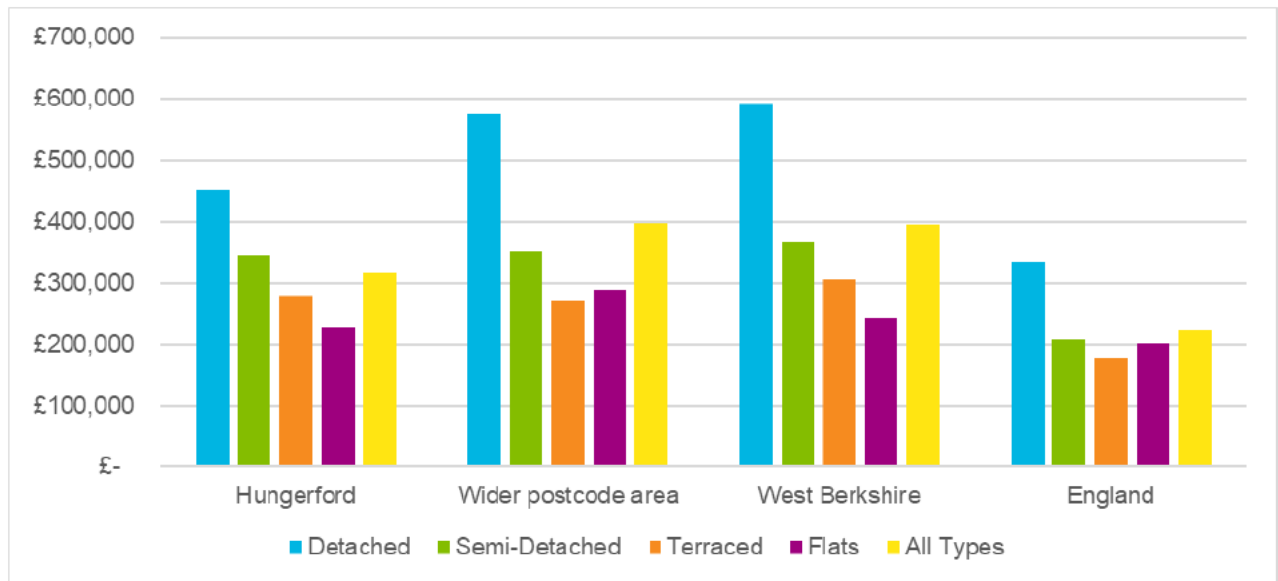
118. We begin by considering the average prices paid in 2017 for different property types in the NA, compared with those in the wider postcode area and the District. Table 5-4 and Figure 5-2 below, which set out this data, shows that average house prices in Hungerford are significantly less expensive than those in both the wider postcode area and the district, although they are still far above national averages. The one exception is that terraced houses in Hungerford are 3% higher than those in the wider postcode area.

¹⁰ West Berkshire Core Strategy DPD

Table 5-4: Mean house prices (2017)

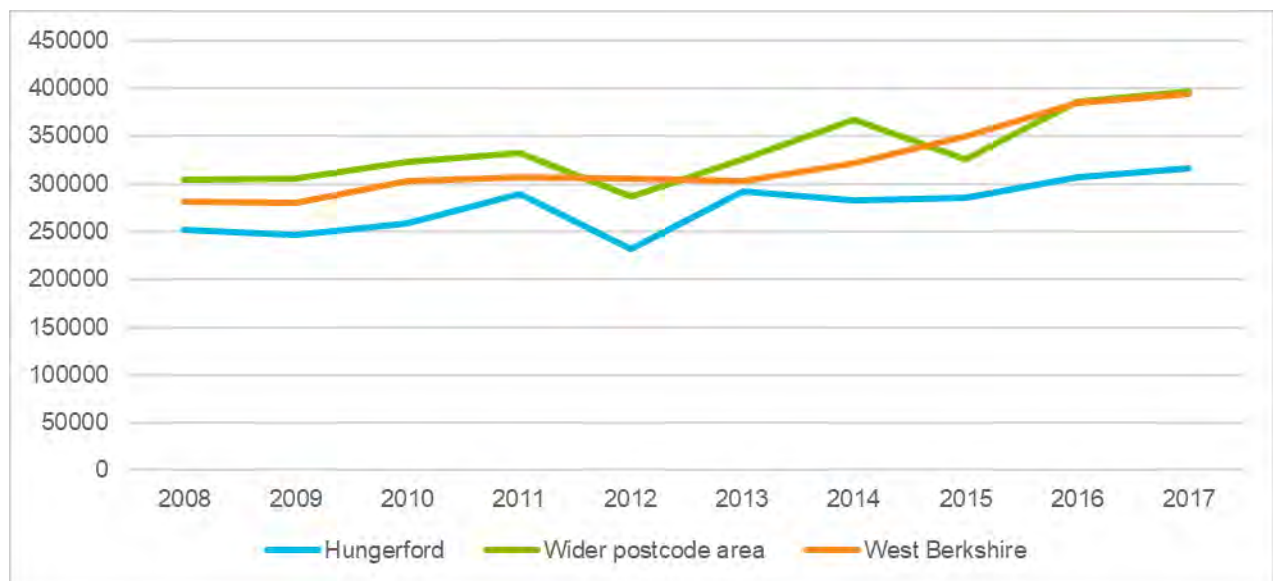
	Detached	Semi-Detached	Terraced	Flats	All Types
Hungerford	£451,048	£345,868	£278,279	£227,402	£316,684
Wider postcode area	£575,171	£351,846	£269,216	£288,417	£397,075
West Berkshire	£591,486	£365,604	£304,954	£242,724	£394,240
England	£334,848	£207,998	£178,874	£201,364	£221,790

Source: Land Registry, UK House Price Index, AECOM Calculations

Figure 5-2: Mean house prices (2017)

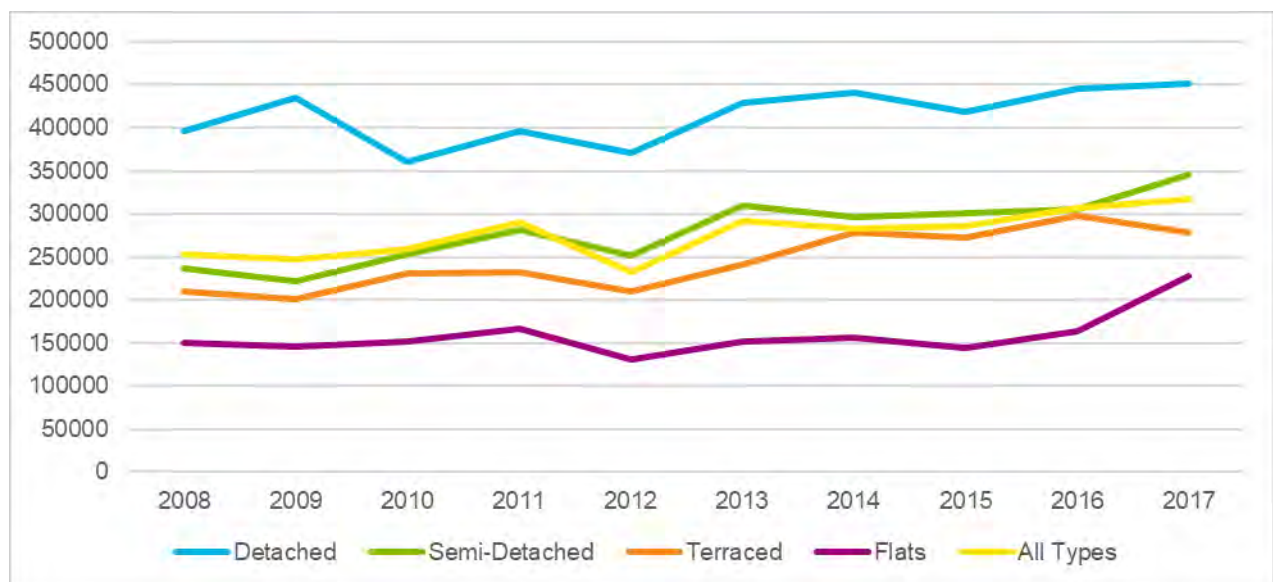
Source: Land Registry, UK House Price Index, AECOM Calculations

119. In addition to recent sold price data, the degree of housing demand is evident in the evolution of house prices over time. To assess the evolution of the housing market we have analysed data from the Land Registry, comparing data for Hungerford with that for the wider postcode area and the District over the period of January 2008 to December 2017. This is presented graphically in Figure 5-3 below, which shows that the evolution of house prices in Hungerford roughly tracks the trajectory of the wider postcode area, while the market of West Berkshire increases more smoothly with fewer peaks and troughs.
120. More importantly, the graph also indicates that Hungerford house prices are increasing more slowly than in the surrounding area. In comparison with the postcode area and the district, Hungerford does not appear to be exhibiting a strong degree of demand pressure.

Figure 5-3: Price paid data, all types January 2008-2017

Source: Land Registry, AECOM Calculations

121. It is helpful to look at Hungerford's price evolution in greater detail to understand whether particular property types are appreciating faster than others. In Figure 5-4 below, which shows the average price paid for each type of housing in Hungerford over the last ten years, it is clear that the prices of all property types have moderately but not consistently increased since their post-recession trough in 2012. The most notable finding here is the strong recent uptick in the price of flats. This significant deviation from the ten-year trend could well indicate a rise in demand for smaller units in Hungerford.

Figure 5-4: Mean house prices by type, 2008-2017

Source: Land Registry, AECOM Calculations

122. Again it proves useful to compare the breakdown of price evolution by housing type to the wider area to identify whether supply is particularly limited or plentiful in Hungerford compared to elsewhere. This is reinforced by the Planning Advisory Service's (PAS) recent technical advice note on Objectively Assessed Needs and Housing Targets, which advises at paragraph 5.38 that, "proportional price change is generally a better indicator than absolute price".
123. Table 5-5 below uses Land Registry data to calculate the average price increase in Hungerford between 2008 and 2017. This is benchmarked against the average price increase for the wider postcode area and for the District. It emerges from this data that semi-detached units have appreciated evenly over the three scales, but that detached houses in Hungerford have underperformed the wider geographical trend by a significant margin – indicating that

further supply is less needed for this type of housing. Again the most notable finding is the strong performance of flats; this is the only dwelling type for which Hungerford outperforms the District, and a type that has also seen very significant growth of 95% in the RG17 postcode area. These facts might suggest that an increase in the supply of flats in Hungerford could help the town to absorb excess demand from the surrounding area.

Table 5-5: Price evolution by type, compared with wider geographies

	Hungerford	RG17	West Berkshire	Difference Hungerford - RG17	Difference Hungerford - West Berkshire
Detached	14%	38%	40%	-24%	-26%
Semi-Detached	46%	42%	50%	3%	-4%
Terraced	32%	25%	47%	7%	-14%
Flats	50%	95%	33%	-44%	18%
All Types	25%	31%	40%	-5%	-15%

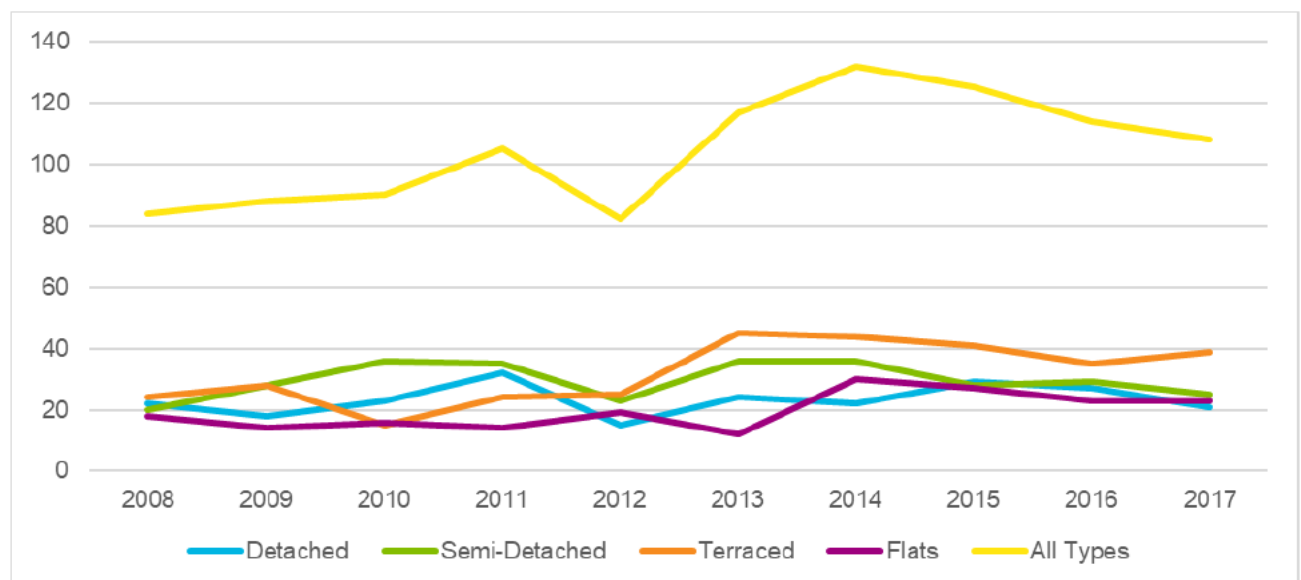
Source: Land Registry, AECOM Calculations

124. Bringing the evidence together, the market price data for Hungerford does not imply a sufficiently acute imbalance of housing demand and supply overall to warrant an adjustment of the town's HNF. Price growth overall has been consistently slower, and prices remain moderately lower, than in the RG17 postcode area and the wider District. However, the breakdown of market performance by dwelling type indicates an undersupply of flats that will shed light on the forthcoming analysis of type and size.

5.4 Housing market (transactions)

125. Assessing the volume of housing sales over time is an important indicator of demand for different types of housing. Figure 5-5: Volume of sales in Hungerford by type, 2008-2017 below presents Land Registry data for housing sales of different dwelling types in Hungerford. It is evident that the total number of sales has been in decline since 2014 after rising in every period except 2012 since 2008.
126. The distribution of sales by type is remarkably even, although the volume of sales of terraced houses has been consistently the highest of all property types since 2012 and flats have in general experienced the lowest number of sales.

Figure 5-5: Volume of sales in Hungerford by type, 2008-2017

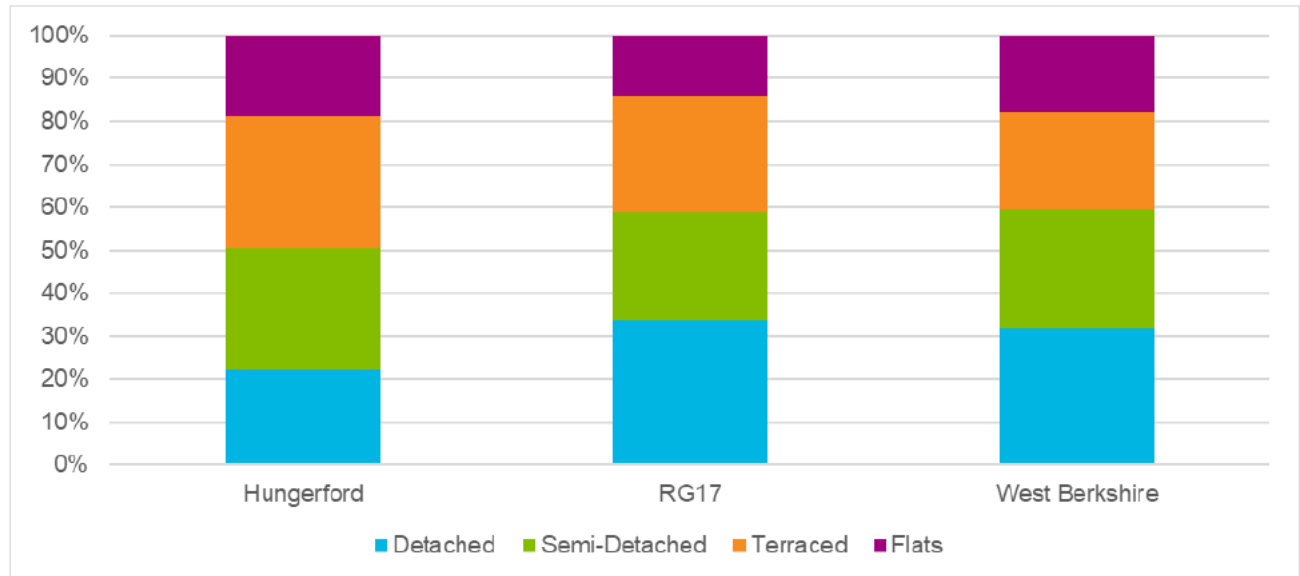


Source: Land Registry, AECOM Calculations

127. Figure 5-6: Volume of property sales by type below depicts the proportion of the total sales over the ten-year period for each type of dwelling, compared with the wider postcode area and the district. The breakdown of total sales by type for Hungerford is both remarkably well-balanced, and very similar to the breakdown of sales recorded at the wider scale.

128. The data do not indicate an especially high level of demand for any particular type of housing, although sales of flats are generally the lowest. That is particularly true for the RG17 postcode area, which is interesting in the light of the finding shown in Table 5-5 above, that the price of flats in RG17 has increased by 95% over the past ten years. It is therefore likely that the relatively lower proportion of flats sold in RG17, and perhaps in Hungerford itself, is due to a restricted stock of available flats rather than a lack of demand.

Figure 5-6: Volume of property sales by type



Source: Land Registry, AECOM Calculations

129. A more accurate approach to benchmarking whether sales volumes represent a clear market signal indicating inflated or depressed demand across different housing types is to compare the proportion of sales of each type of housing (excluding any new builds, which would introduce supply-side factors) with the proportion of the existing housing stock that falls into each category. This allows conclusions to be drawn about whether sales of homes of each type are occurring in or out of proportion to their availability. If a higher proportion are sold than would be expected given their relative availability, this can indicate unmet demand.
130. This comparison is presented in Table 5-6 below, which gives the percentage of sales over the ten-year period for each dwelling type compared with the share of the composition of the available housing stock. Figures relating to the housing stock of West Berkshire as a whole are added alongside for reference.
131. It is evident that the proportion of sales of detached houses and flats is neatly aligned with their relative shares of the overall available housing stock. However, semi-detached units make up a lower proportion of sales than their availability would suggest, and terraced houses make up a higher proportion of sales relative to their availability. This would suggest that there is excess demand for terraced homes and an excess supply of semi-detached homes, although the margins are relatively small. That said, when comparing the ratio of sales in 2017 alone (rather than across the ten-year period) with the available stock, the percentage of semi-detached houses sold declines to 23% while that for terraced houses rises to 36% - possibly reflecting an increase in unmet demand over time for terraced homes and a decrease in demand for semi-detached properties.

Table 5-6: Sales volumes compared with stock by type

	Hungerford Sales (PPD)	Hungerford Stock (ONS)	West Berkshire Stock (ONS)
Detached	22%	23%	34%
Semi-Detached	28%	33%	33%
Terraced	31%	24%	18%
Flats	19%	20%	14%

Source: Land Registry PPD, AECOM Calculations

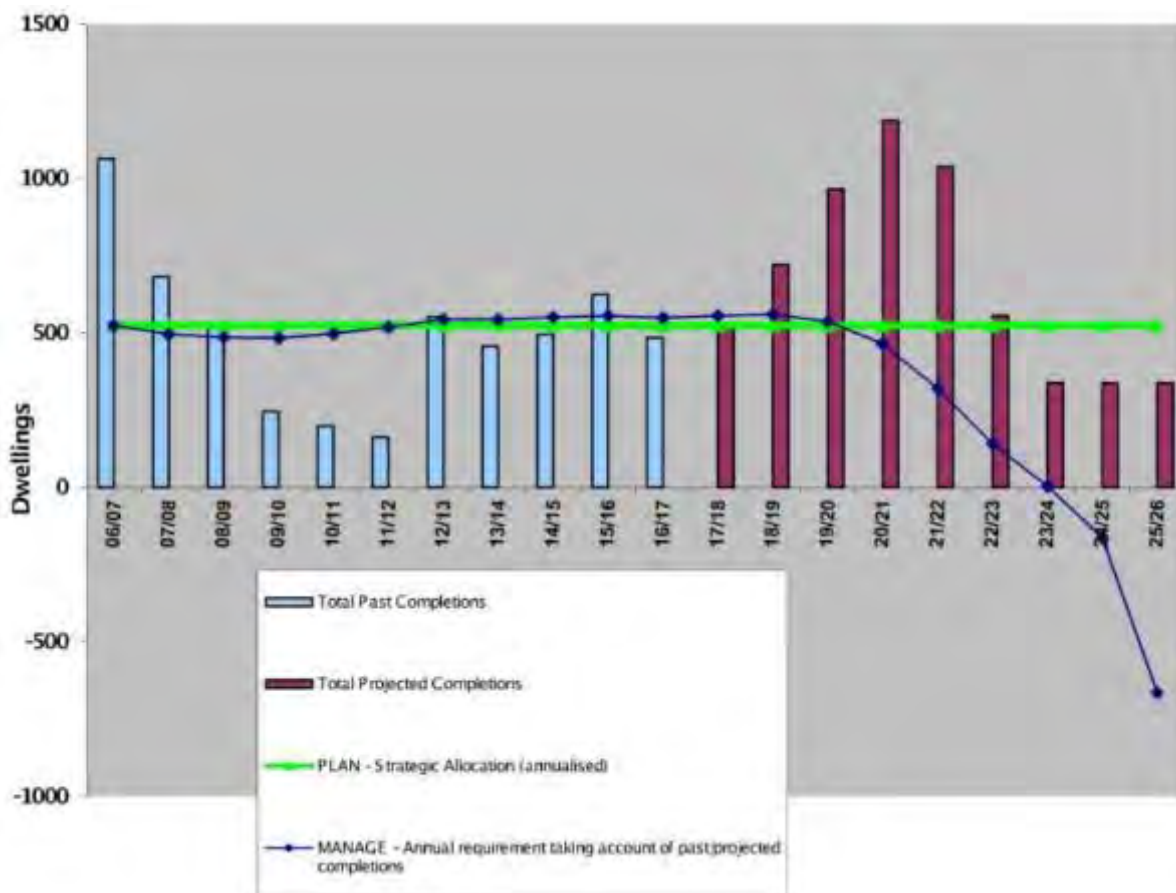
132. Bringing the evidence together, the most important finding is an overall decline in the volume of housing sales since 2014, which suggests that the total demand for housing in Hungerford is relatively stagnant. At a finer level of detail, the proportion of sales of housing of different types in Hungerford reflects the relatively even split of housing types in

the town's available stock. However, sales volumes of terraced houses are increasing steadily over time and indicate a level of demand that is unmet by the existing stock, while sales of semi-detached houses are both gently declining over time and low relative to the stock available. Overall, the evidence does not warrant an upward adjustment to the HNF.

5.5 Rate of development

133. Information on the historic rate of development for West Berkshire is supplied in the Local Plan Annual Monitoring Report: Housing – March 2018. Figure 5-7 below, reproduced from that document, plots past and projected completions against the annualized Core Strategy Requirement of 10,500 dwellings (over the period 2006-2026). It shows that while completions to March 2017 have fallen short of the Core Strategy Requirement (by 287 net new units), a high number of recent permissions and allocated sites in the Housing Site Allocations DPD are expected to boost delivery above 10,500 by the end of the Plan period.

Figure 5-7: West Berkshire past and projected completions



Source: West Berkshire Local Plan Annual Monitoring Report 2017: Housing – March 2018, pg. 12

134. Although the fact of a shortfall to the present date could justify additional pressure on Hungerford to address unmet need across the District, the shortfall is only 5% of the 11-year target (278 units short of 5,775) and therefore does not warrant an uplift in the housing need figure for Hungerford. This position is also supported by the fact that housing completions in Hungerford since the start of the Neighbourhood Plan period have averaged at 24 units per year, which is only 11% less than the indicative HNF for Hungerford (described in further detail in 1.3 paras 18-1). The past rate of development in West Berkshire as well as Hungerford itself is considered sufficient to meet housing need and does not require any change to the HNF.

5.6 Overcrowding and concealment

135. Another indicator of demand in the housing market is the prevalence of overcrowding in the NA. This is because unmet demand for housing in the area can manifest itself in the over-occupation of the available housing stock.

136. One of the most reliable indicators of overcrowding is the 'persons per room' data collected at the household level for the Census.
137. Table 5-7 below shows the percentage increase or decrease in the proportion of households occupying different amounts of space in Hungerford, the wider District and England. In Hungerford's case, the trend is substantially downwards in the most severe overcrowding category of over 1.5 persons per room, which has declined by 60% from 5 residents at the time of the 2001 Census to 2 residents at the time of the 2011 Census. During the same period the number of residents in the less severe 1-1.5 persons per room category has fallen by 25% from 20 to 15 residents. Both the totals and trends over time make clear that overcrowding in Hungerford is not a major concern in relation to overall housing need.

Table 5-7: Trends in number of persons per room in Hungerford, 2001-2011

Persons per room	Hungerford	West Berkshire	England
Up to 0.5 persons per room	8.2%	11.7%	7.9%
Over 0.5 and up to 1.0 persons per room	0.0%	0.9%	7.0%
Over 1.0 and up to 1.5 persons per room	-25.0%	-0.8%	27.3%
Over 1.5 persons per room	-60.0%	-25.0%	2.5%


Source: ONS 2011, AECOM Calculations

138. A further indicator of increased housing demand is the presence of concealed families in the NA. A concealed family is one living in a multi-family household in addition to the primary family, such as a young couple living with parents.¹¹ The number of families considered to be concealed in Hungerford is 21, or 1.2% of the total. This is lower than the West Berkshire average of 1.5% and the England average of 1.9%, so concealment is not an especially prominent issue in Hungerford. However, the number of concealed families does point to some degree of housing demand from families already living in the area.
139. Bringing the evidence together, Hungerford displays relatively low levels of overcrowding and concealment which do not warrant an uplift in the HNF.

5.7 Conclusions

140. We have applied our professional judgment according to the different indicators we have analysed. An upward-pointing arrow indicates there is evidence to increase the housing target (one upward arrow indicates 'some evidence', two upward arrows 'stronger evidence' and three upward arrows indicates even stronger evidence), a downward pointing arrow means the housing target should decrease, and a horizontal arrow means there is insufficient evidence to justify altering the housing target, or the evidence suggests it should remain unchanged.. Factors are set out in the table below in alphabetical order.

Table 5-8: Summary of factors specific to Hungerford with a potential impact on neighbourhood plan housing quantity

Factor	Source(s)	Possible impact on future housing need	Rationale for judgement
Employment and commuting	ONS 2011, AECOM Calculations, DataShine Commute mapping tool, Newbury Vision 2026, Thames Valley Berkshire Strategic Economic Plan,		Hungerford is home to an economically active population. It attracts and retains residents who work in relatively distant locations, including London and particularly Newbury – which is undergoing economically strategic regeneration. West Berkshire as a whole is forecast to create 10,800 new jobs over the Plan period (mirroring that of the NP), which has been used to justify a 14% uplift in the District HNF in the Berkshire SHMA. Together these factors suggest that employment opportunity will continue to grow and to be a key driver of housing demand in Hungerford.

¹¹ <http://webarchive.nationalarchives.gov.uk/20160105222245/http://www.ons.gov.uk/ons/rel/census/2011-census-analysis/what-does-the-2011-census-tell-us-about-concealed-families-living-in-multi-family-households-in-england-and-wales/-sty-what-does-the-2011-census-tell-us-about-concealed-families.html> (visited 01/09/17)

	Berkshire SHMA		
Migration	ONS 2011, AECOM Calculations	↔	Hungerford's international migration rate is low compared to the District and England, and the majority of international migrants in Hungerford have resided there for a significant period of time. Migrants appear to exert very little demand pressure on housing.
Housing market (prices)	Land Registry Price Paid Data for 2008-2017	↔	House prices in Hungerford have risen moderately over the last ten years, demonstrating that demand remains robust but is not strongly increasing. Prices are generally lower and rising less quickly than those in the wider postcode area and District. Price growth over time diverges significantly between different types and sizes of property, suggesting that segments of the market possess more momentum than others. However, taken as a whole, housing market (prices) do not justify an uplift to Hungerford's HNF.
Housing market (transactions)	Land Registry Price Paid Data for 2008-2017, Census Data 2001, 2011	↔	The volume of housing sales in Hungerford has decreased every year since 2014, suggesting that demand is waning. However, sales volumes remain higher than any year during the period 2008-2013, so while the number of transactions has recently dipped this may simply represent a return to a longer-term trend following a spike in demand. Transaction volumes are also drastically different for different dwelling types, with a disproportionately high level of demand for terraced homes and a significant decrease in demand for semi-detached homes. This evidence is not a sufficient cause to alter the HNF for Hungerford in either direction.
Rate of development	Land Registry Data/AECOM Calculations, West Berkshire Local Plan Annual Monitoring Report 2017: Housing – March 2018	↔	The delivery of housing in West Berkshire since 2006 is just 5% below the Local Plan target, and is forecast to grow in the coming years to eventually exceed that target. Hungerford's housing need figure should not therefore rise to combat the District shortfall, and neither should it be reduced as there is no present evidence of a surplus.
Overcrowding and concealment	Census Data 2001, 2011	↔	Overcrowding is low and falling in Hungerford, and although there were 21 concealed families at the time of the last census, they represent a very small proportion of the overall population that is lower than the proportion found at the District and national levels. Neither indicator is strong enough to influence overall housing need.

Application of market signals

Above we have summarised our conclusions regarding the impact of market signals on the quantity of housing needed in Hungerford. On this basis, we recommend that no uplift should be applied to the interim housing target calculated in the Quantity section. Although the economic signal is relatively strong, this is not reflected in the housing market, and other factors are neutral. **This results in an unchanged, final HNF of 27 dwellings per year, or 486 over the Plan period (2018-2036).**

5.8 Local Authority

141. The Local Authority has reviewed this methodology, excluding the market signals analysis, and their comments have been incorporated where applicable. That said, as a next step, it would be advisable for Hungerford Town Council to remain in contact with the West Berkshire District Council as and when updated District-level calculations are reviewed in future.

6. RQ 2. Type and size

RQ2: What type (terrace, semi, bungalows, flats and detached) and size (number of habitable rooms) of housing is most appropriate?

142. The PPG recommends an assessment of the existing housing provision and its suitability to address current and future community need with regard to demographic shifts in age and household composition. Accordingly, we start with a review of the type and size profile of the existing housing stock in Hungerford. Demographic shifts in age and household composition will then be considered. Finally, the future demand for housing by type and size will be determined.

6.1 Background and definitions

143. Before beginning our consideration of type and size, it is important to understand how different types of households (groups of people living at the same address) occupy their homes. Crucially, household 'consumption' of housing (in terms of housing size) tends to increase alongside wealth and income, with the highest earning households consuming relatively more (i.e. larger) housing than those on lower incomes. Similarly, housing consumption tends to increase with age, such that older households tend to have larger homes than younger households, often as a result of accumulated wealth and expanding families.
144. Yet smaller households (those with lower numbers of inhabitants) may also choose to live in larger homes than their needs would suggest, and thus would be defined in census terms as under-occupying their homes. This is a natural feature of the housing market, but it can distort how future housing need is understood: demographics often present a very different picture than that suggested by market dynamics and signals, and it is helpful to bear in mind that housing need is different from housing choice.
145. In order to understand the terminology used to describe the size of dwellings, it is important to note that the number of rooms recorded in census data excludes some rooms such as bathrooms, toilets and halls, and to be clear that data on dwelling size is collected on the number of rooms being occupied by each household. In the section that follows, 'dwelling sizes' should be understood as follows¹²:
- one room = bedsit
 - two rooms = flat/house with one bedroom and a reception room/kitchen
 - three rooms = flat/house one to two bedrooms and one reception room/kitchen
 - four rooms = flat/house with two bedrooms, one reception room and one kitchen
 - five rooms = flat/house with three bedrooms, one reception room and one kitchen
 - six rooms = house with three bedrooms, two reception rooms and a kitchen, or four bedrooms, one reception room and a kitchen
 - seven+ rooms = house with four or more bedrooms
146. It is also useful to clarify the census terminology around dwellings and household spaces, which can be confusing in the context of flats, shared or communal dwellings, and houses in multiple occupation – types that typically come under the private rented sector. Dwellings are counted in the census by combining address information with responses stating whether or not a household's accommodation is self-contained,¹³ and as such all dwellings are classified into either shared or unshared dwellings. Household spaces make up the individual accommodation units forming part of a shared dwelling.
147. The key measure of whether a dwelling is shared or unshared relates to the census definition of a household. A household is defined as "One person living alone or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room or sitting room or dining area."¹⁴ On this basis, where unrelated residents of a dwelling share rooms other than a kitchen, this would be considered a single household in an unshared dwelling, whilst where only a kitchen is shared, each resident would be considered their own household, and the dwelling would be considered shared.
148. Whilst it is unlikely that these issues are of particular relevance to Hungerford, it is still helpful to understand the terms as a background to the data in this chapter.

¹² <https://www.nomisweb.co.uk/census/2011/qs407ew>

¹³ <https://www.gov.uk/guidance/dwelling-stock-data-notes-and-definitions-includes-hfr-full-guidance-notes-and-returns-form>

¹⁴ Ibid.

6.2 Existing types and sizes

Type

149. Table 6-1 below shows that the housing mix in Hungerford is relatively well-aligned with the England average, but contains more terraced houses, flats, and accommodation in commercial buildings than West Berkshire, which in turn has far more detached houses than Hungerford. The majority of dwellings are houses, particularly semi-detached houses. The most common dwelling type is semi-detached houses, and houses taken together account for 80% of all dwellings.

Table 6-1: Accommodation type per household space, 2011

Dwelling type		Hungerford	West Berkshire	England
Whole house or bungalow	Detached	22.7%	33.9%	22.4%
	Semi-detached	32.9%	32.8%	31.2%
	Terraced	24.3%	17.9%	24.5%
Flat, maisonette or apartment	Purpose-built block of flats or tenement	15.9%	11.7%	16.4%
	Parts of a converted or shared house	2.0%	2.0%	3.8%
	In commercial building	2.2%	0.8%	1.0%

Source: ONS 2011, AECOM Calculations

Size

150. Rooms per household is the most accurate proxy for size of dwelling for which data is available. Table 6-2 below sets out the distribution of the number of rooms by household space in Hungerford and the wider District. It shows that patterns of occupation in Hungerford are skewed slightly more towards smaller dwellings, with 34% of households occupying dwellings of four rooms or fewer compared with 26% in West Berkshire overall. There is also a far greater proportion of West Berkshire households dwelling in homes with nine or more bedrooms than in Hungerford.

Table 6-2: Number of rooms per household space, 2011

Number of rooms	Hungerford		West Berkshire	
	Frequency	%	Frequency	%
All categories: number of household spaces	2,600		62,340	
1 room	11	0.4%	184	0.3%
2 rooms	88	3.4%	1,325	2.1%
3 rooms	242	9.3%	4,927	7.9%
4 rooms	534	20.5%	9,809	15.7%
5 rooms	528	20.3%	12,994	20.8%
6 rooms	496	19.1%	11,751	18.8%
7 rooms	340	13.1%	7,520	12.1%
8 rooms	158	6.1%	5,796	9.3%
9 rooms or more	11	7.8%	184	12.9%

Source: ONS 2011, AECOM Calculations

151. It is also useful to compare this data with census estimates of the number of bedrooms occupied by each household in Hungerford. Table 6-3 below summarises the proportion of households occupying each size of home in terms of the number of bedrooms. This data accords with the findings displayed in Table 6-2: Hungerford households are more likely to occupy dwellings of zero to two bedrooms, while West Berkshire households are more likely to occupy dwellings of four or more bedrooms. In both geographies, the majority of households occupy dwellings of two or three bedrooms.

152. We can also make some approximate conclusions about the number of rooms in Hungerford's stock of dwellings with different numbers of bedrooms. The category of one bedroom or less is roughly equal to the number of dwellings with one, two and three rooms, while the category of four or more bedrooms is roughly equal to the number of dwellings with seven or more rooms. From this it can be assumed that almost all of the 496 dwellings with six rooms must also contain three bedrooms, meaning that these houses also contain two reception rooms in addition to their bedrooms and kitchens. The remaining two- and three-bedroom properties can be assumed to have four or five rooms in total.

Table 6-3: Estimated number of bedrooms in household spaces, 2011

Number of bedrooms	Hungerford		West Berkshire	
	Frequency	%	Frequency	%
All categories: number of bedrooms	2,600		62,340	
No bedrooms	15	0.6%	137	0.2%
1 bedroom	309	11.9%	5,677	9.1%
2 bedrooms	732	28.2%	13,946	22.4%
3 bedrooms	1,019	39.2%	24,660	39.6%
4 bedrooms	411	15.8%	13,322	21.4%
5 or more bedrooms	114	4.4%	4,598	7.4%

Source: ONS 2011, AECOM Calculations

153. In Table 6-4 below we set out how the same data pertaining to the number of rooms expressed in Table 6-2 has changed over the 2001-2011 intercensal period. This shows that the distribution of the Hungerford housing stock has not changed particularly significantly, with most dwelling sizes remaining within 12% of their prior tally. The most notable increase is a jump in the number of seven- and eight-bedroom dwellings, although similar increases were observed at the District and national level.
154. Hungerford has seen much lower growth in the number of smaller properties than West Berkshire and England have over the same period. When viewed in the context of the finding above – that Hungerford occupation patterns are skewed toward smaller units compared with the District – this is evidence that the two geographies are moving closer together in terms of the distribution of their respective occupation patterns rather than continuing to diverge.

Table 6-4: Rates of change in number of rooms per household, 2001-2011

Number of Rooms	Hungerford	West Berkshire	England
1 room	0.0%	-42.5%	-5.2%
2 rooms	11.4%	26.9%	24.2%
3 rooms	3.0%	14.2%	20.4%
4 rooms	6.8%	9.9%	3.5%
5 rooms	-10.7%	-6.4%	-1.8%
6 rooms	1.6%	4.0%	2.1%
7 rooms	34.4%	15.8%	17.9%
8 rooms or more	21.1%	24.7%	29.8%

Source: ONS 2011, AECOM Calculations

6.3 Household composition and age structure

155. Having established the current profile of Hungerford's housing stock and how it has changed over time, we now turn to the composition of households living in the area. The age structure and size of households are fundamental factors in the size of future housing needed in Hungerford.

Current household composition

156. In Table 6-5 below, we present data relating to household composition drawn from Census 2011. From this it is possible to identify how household composition in Hungerford differs from the wider District. The clearest differences are the higher proportion of one-person households in Hungerford (33.3% compared with 25.9%) and the lower proportion of one-family households with dependent children (23.2% compared with 29%). These findings align with the contrast between Hungerford and West Berkshire's overall age profiles, as expressed in the Census 2011: 20% of Hungerford residents are aged 65 and over, compared with 15% in West Berkshire, while 26% of Hungerford residents are aged 24 and under, compared with 30% in West Berkshire as a whole.

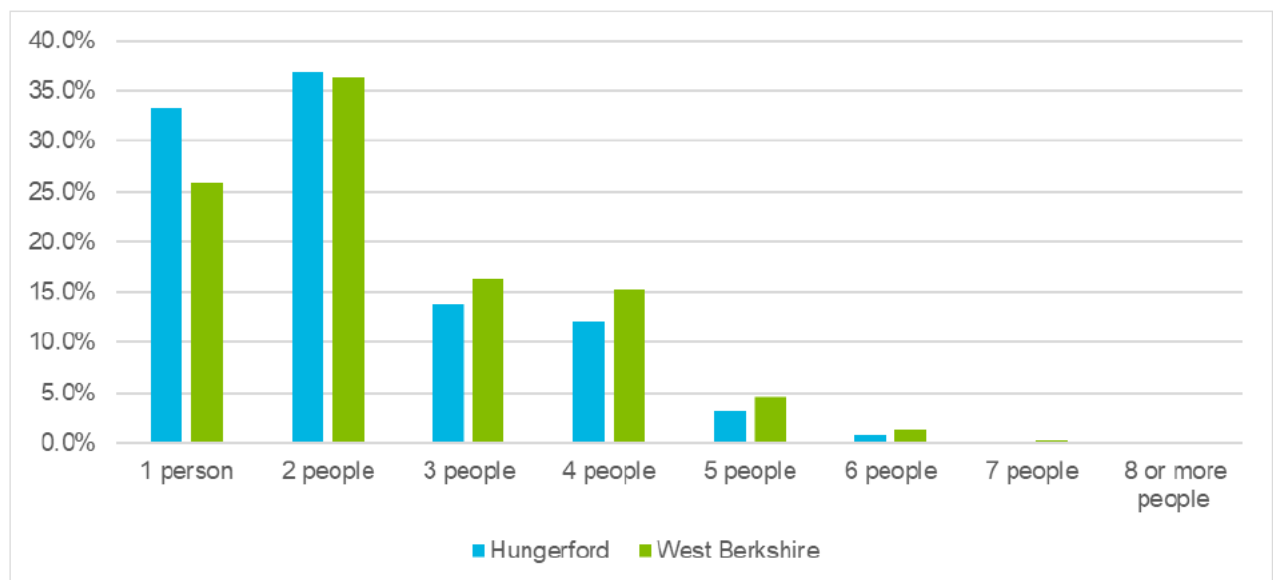
Table 6-5: Household composition (by household), 2011

Household type		Hungerford	West Berkshire	England
One person household	Total	33.3%	25.9%	30.2%
	Aged 65 and over	15.6%	10.9%	12.4%
	Other	17.7%	14.9%	17.9%
One family only	Total	62.0%	68.4%	61.8%
	All aged 65 and over	9.0%	8.5%	8.1%
	With no children	21.8%	21.5%	17.6%
	With dependent children	23.2%	29.0%	26.5%
	All children non-dependent	8.0%	9.4%	9.6%
Other household types	Total	4.7%	5.7%	8.0%

Source: ONS 2011, AECOM Calculations.

157. It is useful to consider household size (by number of people) alongside household composition in order to get a fuller picture of differences in occupation patterns between the NA and the District.¹⁵ Figure 6-1 below indicates that, although two-person households are the most common size in both geographies, Hungerford households are much more likely to contain only one person than those in West Berkshire. Correspondingly, there are higher proportions of households continuing three or more people in West Berkshire than in Hungerford. This confirms the above finding that there are more single person households in Hungerford and fewer families with children (which tend to be found in large household groups). This may be a result of the social infrastructure needed by families being more easily available elsewhere, or simply due to Hungerford's older population.

Figure 6-1: Household size



Source: ONS 2011, AECOM Calculations

¹⁵ The size of a household is equal to the number of usual residents in the household. Visitors staying at an address do not contribute to that household's size because they are counted in the household of their place of usual residence.

158. Census data also allows us to study changes in household composition between 2001 and 2011. The changes in household composition observed in Hungerford display some striking differences to those observed for the wider District.
159. The ageing of households in Hungerford is occurring at twice the pace of the trend in West Berkshire, with 25.1% compared with 12.6% total growth in one person and one family households aged 65 and over. This accords with the finding that Hungerford is home to more single-person households, which are found more often among the elderly population. The number of one-person households younger than 65 increased particularly strongly across West Berkshire (25.1%) compared with a smaller increase of 9.5% in Hungerford. One family households with non-dependent children in Hungerford were the only category to see a decline (-2.3%) over the intercensal period, while they rose by 6.6% in the District.
160. It is also worth noting that, despite these contrasts, the evolution of household composition in Hungerford and West Berkshire share two particularly notable characteristics when compared with England averages. The growth in other household types in Hungerford and West Berkshire (such as multi-family households and houseshares) were 4.3% and 5.4% respectively, a much lower rate of growth than the 28.9% observed in England. Additionally, one person and one family households aged 65 and over increased in the NA and the District, but declined across England as a whole. This suggests that the population is ageing faster in the district and particularly in Hungerford than across England, and that other household types are a relatively insignificant and more slowly growing feature of NA and District occupation patterns than national ones. This may be due to the rising frequency of house sharing and student living across the country and especially in cities – a trend that is not frequently seen in rural areas.

Table 6-6: Rates of change in household composition, 2001-2011

Household type		Hungerford	West Berkshire	England
One-person household	Total	9.9%	14.5%	8.4%
	Aged 65 and over	10.3%	2.7%	-7.3%
	Other	9.5%	25.1%	22.7%
One family only	Total	4.0%	6.9%	5.4%
	All aged 65 and over	14.8%	9.9%	-2.0%
	With no children	1.6%	5.2%	7.1%
	With dependent children	4.9%	7.4%	5.0%
	All children non-dependent	-2.3%	6.6%	10.6%
Other household types	Total	4.3%	5.4%	28.9%

Source: ONS 2001 and 2011, AECOM Calculations

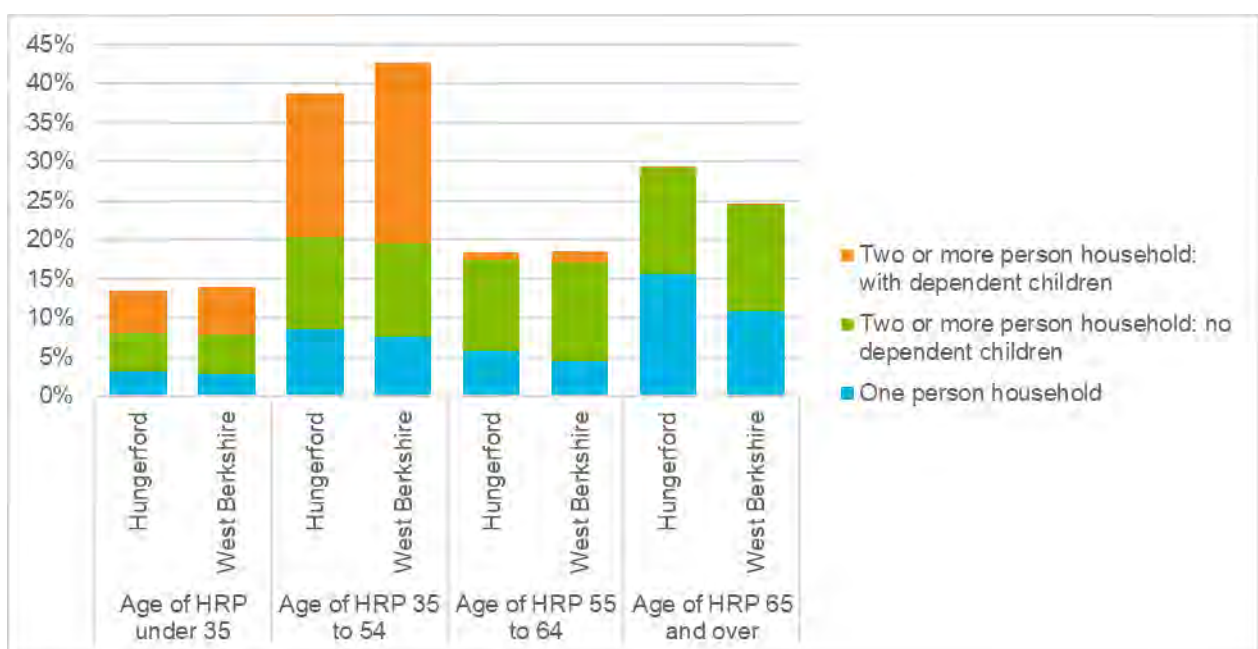
Household age bands

Housing need in terms of type and size is also strongly influenced by the age of householders and the wider population. Figure 6-2 below shows the age distribution of Hungerford's residents at the time of the Census 2011, compared with those of the District and England. In accordance with much of the data reviewed above, it shows that of the six age bands into which the data are grouped, the proportion of Hungerford's residents falling into the youngest three is lower and the proportion falling into the oldest three is higher than both of the wider geographies. It also shows the significant jump that can be expected in the over 65 population as the large 45-64 age cohort ages.

Figure 6-2: Age distribution, 2011

Source: ONS 2011, AECOM Calculations

161. Figure 6-3 below compares households in Hungerford and West Berkshire according to the age of the Household Reference Person (HRP). The HRP is the person in households containing more than one person who is the most economically active, usually the most economically active parent in family households. This permits a more nuanced analysis of the occupation patterns, and therefore housing need, associated with Hungerford residents at different life stages.
162. The proportion of households in which the HRP is aged under 35 and between 55 and 64 are very similar for the NA and the District, while Hungerford has more households in which the HRP is aged above 65 and West Berkshire has an equivalent proportion more households in which the HRP is aged between 35 and 54. More significant in respect of household sizes, in every HRP life stage bracket Hungerford has a higher proportion of one person households than West Berkshire. Similarly, in every life stage bracket, West Berkshire has higher proportions of two- or more person households both with children and without, except households above 65 without dependent children, for whom the margin is just 0.1% in Hungerford's favour. The strongest divergences are in HRP 35 to 54 households with two or more persons including dependent children (18.3% in Hungerford and 23.1% in West Berkshire) and HP 65 and over households with one occupant (15.6% in Hungerford and 10.9% in West Berkshire). In simplistic terms, Hungerford has more older, smaller households and fewer households with children than the wider District.

Figure 6-3: Households by age of the HRP

Source: ONS 2011, AECOM Calculations

Future household composition and age mix

163. Having analysed the age structure of the current population and households in the NA, we now turn to how they have changed over the intercensal period and how they are projected to change in future.
164. Table 6-7 below presents the changes in the number of people in different age brackets between 2001 and 2011. Hungerford's patterns of population growth are similar to those of West Berkshire, particularly in the higher age brackets, although Hungerford is experiencing a contraction in the population of 16-24 year olds while the District has seen a moderate gain, and Hungerford's decline in the population of 25-44 year olds is more drastic than West Berkshire's. The total rate of growth or decline in the three population brackets under 44 years has declined strongly at -18.6% in Hungerford, stabilised at 1.3% in West Berkshire, and grown by 19.8% for England as a whole. While Hungerford is ageing faster than the two wider geographies, its main demographic challenge is the contraction in the replacement younger population. With regard to housing, this could indicate that dwellings appropriate to young and newly forming households are not in sufficient supply to retain Hungerford's young people and should be supplied, or that younger age groups move away for other reasons and the stock of housing should be rebalanced to suit the growing retirement-age cohort.

Table 6-7: Rate of change in the age structure of the population, 2001-2011

Age group	Hungerford	West Berkshire	England
0-15	1.4%	3.2%	1.2%
16-24	-6.2%	4.9%	17.2%
25-44	-13.8%	-6.8%	1.4%
45-64	18.8%	17.1%	15.2%
65-84	19.7%	21.8%	9.1%
85 and over	39.7%	34.2%	23.7%

Source: ONS 2001 and 2011, AECOM Calculations

165. In order to arrive at an understanding of how the age structure of the population will change over the Plan period, it is necessary to refer to District level data because it is not available at the NA level. Drawn from the 2014-based Household Projections, Table 6-8 below sets out forecast changes to the age structure of the population in West Berkshire between 2014 and 2039. Percentage change has been calculated from 2011 data because that is more accurate than the 2014 estimates.
166. The data shows a clear decline in the population of all age brackets up to the age of 65 and suggests a continuation of the trend shown above – that the 25-44 age bracket is seeing the steepest decline. While the total projected decline in the under 65 population is 12.9%, the population over that age is forecast to nearly double (98%) over the 28-year period.
167. Given that Hungerford saw its 16-44 year old population decline much faster than the District, and its 65 and over population increase marginally faster, it is reasonable to expect that Hungerford's future demographic change will be even more extreme than that of West Berkshire in terms of its ageing.

Table 6-8: MHCLG Household projections for West Berkshire by household age

	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
2011	1,276	7,491	26,637	11,572	15,364
2014	1,185	6,891	26,043	11,104	18,355
2039	1,271	5,384	22,804	11,445	31,784
2011-2039 % increase	-0.4%	-28.1%	-14.4%	-1.1%	99.8%

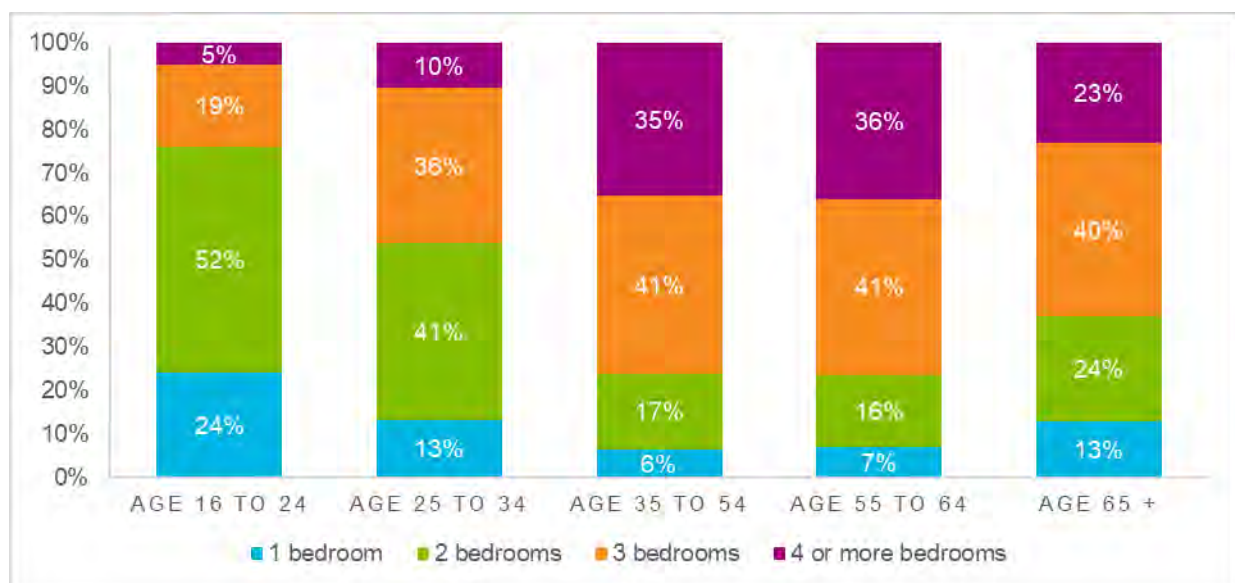
Source: MHCLG 2014-based household projections, ONS 2011

6.4 Current patterns of occupation

168. To estimate the housing mix needed by the end of the Plan period we adopt an approach which assumes that current occupation patterns – that is, the propensity of households of different ages to occupy different types of accommodation – will persist into the future. For example, projected growth in single person households aged over 65 will lead to an increase in the need for the type of housing currently occupied by single person households of that age.

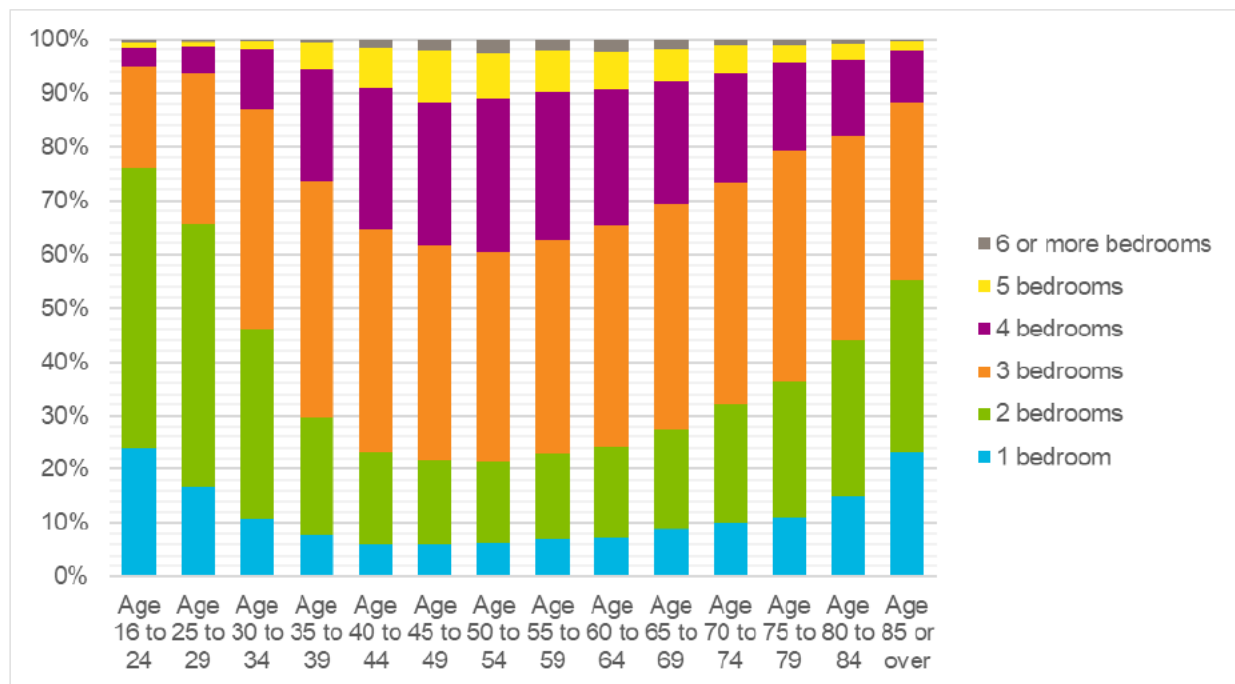
169. Size of housing is strongly correlated with household life stage. However, no data on housing size occupation by age of the HRP is available at the parish level, so District-level data will again need to be used as a proxy. That data is presented in Figure 6-4 below, showing the size of property occupied by different age groups.
170. While the majority of younger households between 16 and 34 live in two-bedroom dwellings (52% and 41% respectively), all other groups live mainly in three-bedroom dwellings, with four-bedroom dwellings close behind for ages 35 to 64. The overwhelming majority of households where the HRP is aged between 16 and 24 live in homes with no more than two bedrooms (about 76%). Those where the HRP is aged between 35 and 64 mainly live in larger, family-sized homes of three bedrooms and above (ranging from a total of 63% to 77%). It makes sense for households between 35 and 54 to live in family-sized homes, as most of them have dependent children (as seen in Figure 6-3). However, very few households between 55 and 64 live with dependent a child (in West Berkshire, Hungerford, or in general), which means households tend to remain in their large family homes after their children have left. After 65, although the majority of households still live in homes of three bedrooms and above (63%), a larger percentage of households live in smaller dwellings (37% compared with 23% for each of the next youngest age brackets).

Figure 6-4: Age of household reference person to size in West Berkshire, 2011



Source: ONS 2011, AECOM Calculations

171. Figure 6-5 below is similar to the chart above but is more detailed in terms of age groups and number of bedrooms. It shows that downsizing is a slow process and that a majority of households in the District tend to remain in their larger homes of three bedrooms and above until well into their eighties. The majority of households aged 85 and over live in one to two bedrooms homes, but there is still a large proportion of households living in homes of three bedrooms and above. Ownership of dwellings of four or more bedrooms begins to decline from the age of 55.

Figure 6-5: Age of household reference person to size in West Berkshire, 2011 (detailed)

Source: ONS 2011, AECOM Calculations

6.5 Dwelling mix determined by life-stage modelling

172. In this section, we provide an estimate of the mix homes by size needed by the end of the Plan period by matching future household composition to current patterns of occupation by age (working from the assumption set out at the start of this section that the same household types are likely to wish to occupy the same size of homes in 2036 as they did in 2011).
173. First, we use household projections provided by MHCLG to achieve an understanding of the future distribution of households by the age of the HRP. This data is only available at the District level and for the years 2014 and 2039. Therefore, the distribution of households by the age of the HRP in 2036 has been estimated by dividing the total projected increase by the number of years between 2014-2039 and subtracting three years' worth of annualised population growth from the 2039 figure. These estimates are given in red in the table. The data, only slightly different from that in Table 6-8 is presented in Table 6-9 below.

Table 6-9: Projected distribution of households by age of HRP (West Berkshire)

	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
2011	1,276	7,491	26,637	11,572	15,364
2014	1,185	6,891	26,043	11,104	18,355
2036	1,261	5,565	23,193	11,404	30,173
2039	1,271	5,384	22,804	11,445	31,784

Source(s): MHCLG 2014-based household projections, ONS 2011, AECOM Calculations

174. At this point it is necessary to arrive at an estimate of the change to the age structure of the population in Hungerford. To do so, the percentage of increase expected for each group in West Berkshire, derived from the data presented in Table 6-9 is applied to the population of Hungerford. The results of this calculation are presented in Table 6-10: **Projected distribution of households by age of HRP (Hungerford)** below.

175. It is immediately clear from this projection that Hungerford's population is ageing: its demographic profile in 2036 is dominated by the 65 and over age group, followed by the 35 to 54 population (which is slowly declining). In fact, the combined population of these two age bands (35 to 54 and 65 and over) represents 76% of the entire population of the NA in 2036. We should therefore expect the dwelling size preferences of these households to have by far the greatest impact on the ideal dwelling mix put forward below.

Table 6-10: Projected distribution of households by age of HRP (Hungerford)

	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
2011	61	290	1,007	481	761
2014	57	267	985	462	909
2036	60	215	877	474	1,494
2039	61	208	862	476	1,574

Source: AECOM Calculations

176. In Table 6-11 below, we work from the same dataset as Figure 6-4 and set out the distribution of dwellings of different sizes occupied by West Berkshire residents according to the age of the HRP.

Table 6-11: Age of household reference person to size, grouped (West Berkshire)

	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
1-bed	24%	13%	6%	7%	13%
2-bed	52%	41%	17%	16%	24%
3-bed	19%	36%	41%	41%	40%
4-bed	4%	9%	26%	26%	18%
5+ bed	2%	2%	10%	10%	5%

Source(s): MHCLG 2014-based household projections, ONS 2011, AECOM Calculations

177. Having established the projected number of households in Hungerford falling into each of these stages at the end of the Plan period in 2036 (Table 6-10), and the preference shown by households at different life-stages towards dwellings of different sizes (Table 6-11), it is possible to put forward an estimation of the 'ideal' mix of dwellings sizes required to accommodate this future population.
178. From there, we can develop a recommendation as to how the housing stock should evolve in terms of size over the Plan period to overcome any misalignments between the existing supply of dwellings and demand.
179. Table 6-12 below takes the projection population falling into each age band, and then apportions those households among different sizes of dwellings according to the preferences expressed by households at District level. As noted previously, because more than three-quarters of the 2036 population are aged 35 to 54 or 65 and over, the dwellings size preferences of those two age cohorts have an outsized impact on the total recommended dwelling mix. As three-bedroom dwellings are the most popular dwelling size among both groups, they dominate the recommended dwelling mix, with two- and four-bedroom dwellings the next most popular options.

Table 6-12: Ideal size distribution in Hungerford in 2036, by household life stage

	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over	Total
Population 2036	60	215	877	474	1,494	3,121
1-bed	14	28	57	34	191	325
2-bed	31	87	152	78	362	710
3-bed	11	77	359	192	598	1,237
4-bed	2	19	226	125	264	636
5+ bed	1	4	83	45	80	213

Source: Census 2011, AECOM Calculations

180. We are now able to compare the housing mix in terms of size in 2011 with the projected requirement based on the estimates set out above. Table 6-13 below indicates that the distribution of dwellings should be weighted more towards the larger end of the size spectrum, with a particular focus on four-bedroom dwellings.
181. The share of the population requiring three-bedroom dwellings is very similar, but because the population is increasing the number of dwellings also needs to increase, while the share of the population requiring two- and one-bedroom dwellings is decreasing and that requiring four or more bedrooms is increasing. This is a direct consequence of the ageing of the population: there are projected to be very few young households, which typically occupy smaller units,

and many more older households, who occupy slightly smaller households than middle-aged households but still skew to the larger sizes.

Table 6-13: Size distribution in 2011 compared to ideal distribution in 2036 (Hungerford)

Number of bedrooms	2011		2036	
1-bed	309	12%	325	10.4%
2-bed	732	28.3%	711	22.8%
3-bed	1,019	39.4%	1,237	39.6%
4-bed	411	15.9%	636	20.4%
5+ bed	114	4.4%	213	6.8%
Total households (not counting those with 0 bedrooms)	2,585		3,121	

Source: Census 2011, AECOM Calculations

182. Table 6-14 below sets out the misalignment between the current stock in the NA and future demand for housing of different sizes, based on the preferences expressed by households at different life-stages. Because it is not beneficial to remove dwellings from the available stock, we have set the recommended split for two-bedroom dwellings at 0% rather than a negative number, and rebalanced the other recommended splits as percentages of the additional dwellings they represent in total.

Table 6-14: Misalignments of supply and demand for housing

Number of bedrooms	2011	2036	Change to housing mix	Recommended split
1-bed	309	325	16	2.8%
2-bed	732	711	-21	0%
3-bed	1,019	1,237	218	39.2%
4-bed	411	636	225	40.3%
5+ bed	114	213	99	17.7%

Source: AECOM Calculations

183. What emerges from this exercise is the recommendation that, in order to avoid misalignment between supply and demand and to re-equilibrate the stock, 39% of houses in new developments be three-bedroom homes, 40% four-bedroom, 18% five-bedroom and 3% one-bedroom. Most of the need will be for three- and four-bedroom homes and there will be no need to build further two-bedroom properties.
184. Because the projected increase in the number of households used here does not represent the overall quantity of new housing needed in Hungerford, the appropriate final step is to apply the recommended split of new dwellings by size to the number of dwellings required over the remainder of the Plan period as presented in the Quantity section: 486 dwellings over the period 2018-2036. This is given in Table 6-15 below.

Table 6-15: Dwelling mix needed over the remainder of the Plan period (may not sum due to rounding)

Number of bedrooms	Recommended split	Additional dwellings required 2018-2036
1-bed	2.8%	14
2-bed	0%	0
3-bed	39.2%	191
4-bed	40.3%	196
5+ bed	17.7%	86

Source: AECOM Calculations

185. This final recommendation is an approximation of future housing need that takes into account the local specificity of Hungerford's population dynamics, as well as the broader tendencies of households across the wider district to occupy homes of various sizes. However, it requires a significant caveat.

6.6 Adjustment for downsizing

186. The propensity of households of different age bands to occupy different sizes of dwelling is not a pure expression of preference. It is also constrained by the actual housing stock on offer: households can only make choices based on the limited range of options available to them.
187. Although the housing market does to an extent ensure that supply reflects demand at the time of construction, the UK's housing stock has been built up over centuries. The total stock of housing that has been accumulated to the present day is therefore not necessarily well-aligned with today's demographic profile and consumer preferences.
188. One example of this misalignment, which is of particular relevance to Hungerford, stems from the rapid ageing of the population. There is a strong extent to which the occupation profile of the District, upon which this calculation significantly depends, may have baked in certain market failures – foremost among which is the undersupply of smaller housing units which, as the population ages, older people would be likely to wish to occupy in greater numbers than they are currently.
189. Indeed, where across England the share of dwellings which have one to two bedrooms is 39.4%, in West Berkshire it is 31.5%, and where in England the percentage of people aged 65 and over who occupy dwellings of four or more bedrooms is 14%, in West Berkshire it is 23%. Undersupply of small dwellings is correlated with the propensity of older people to occupy large dwellings.
190. The obstacle for many potential-downsizers is an undersupply of suitable smaller dwellings to move into. So the 23% of West Berkshire households aged 65 and over and living in dwellings with four or more bedrooms are exhibiting a tendency to occupy large dwellings that may be a result of limited choice as well as preference. The lower prevalence of older people occupying larger dwellings at the national level points to a potentially higher rate of downsizing where smaller properties are available.¹⁶
191. Encouraged by Hungerford Town Council's particular interest in exploring the question of downsizing, we next produce an amended version of the life stage modelling exercise that attempts to correct the bias in the District-level data toward the occupation of large properties by older age groups.

Downsizing national context

192. A 2018 poll of 3,000 UK residents aged 65 and over found that 38% would consider downsizing now, a further 10% would do so if a stamp duty exemption or other tax incentive were introduced, and the total percentage of respondents considering downsizing is increasing at a rate of 4% per year.¹⁷
193. That is the most recent of a series of surveys and reports that explore and quantify the desire to downsize – often in the context of the obstacles to doing so. In a notable 2013 study by the think tank Demos, 58% of people over 60 expressed an interest in moving, with 57% of those people wanting to downsize by at least one bedroom, rising to 76% among people currently occupying properties of three or more bedrooms. The 57% of 58% who wish to move to a smaller property represent 33% of over 60s.¹⁸ This proportion accords with the finding above that 38% of over 65s are considering downsizing, and that the number expressing that desire is rising over time.
194. A 2018 House of Commons Report references a survey of 1,500 people by the organisation Later Life Ambitions that found that 55% of older people highlighted a lack of smaller homes on the market as being a barrier to moving, and adds that a further obstacle is the inadequate dispersal of homes appropriate to older people's needs, meaning that it can be difficult to find a new home close to friends and family.¹⁹ This suggests that adequate provision of smaller dwellings is the most important change required to allow those who wish to downsize to actually do so, and that the future provision of smaller dwellings within the town of Hungerford – where social and family ties have been established by many older residents – would be particularly beneficial. It has also been suggested, though the topic is controversial, that facilitating more downsizing will unlock much needed supply in the market for family homes, further improving housing access and affordability further down the homebuying ladder.
195. The Demos report found that more than 83% of over 60s living in England own their own homes, and that 64% own without a mortgage.²⁰ For this reason, and because renters are usually more mobile in their housing choices, downsizing as a topic of national debate revolves primarily around homeowners making a transition either to smaller

¹⁶ The District level is considered the most appropriate geography for gaining an understanding of what we have described as preference for dwellings of various sizes because it is assumed that those preferences are more likely to be shared by people living in the NA. For example, people may choose to live in Hungerford or West Berkshire because of the rural characteristics shared by those places. The preferences of city-dwellers, who would be included in wider geographies, would not be as relevant to Hungerford's future population.

¹⁷ McCarthy & Stone, *Retirement Housing: Integral to an ageing Britain* 2018

¹⁸ Claudia Wood for Demos, *The Top of the Ladder*, 2013.

¹⁹ House of Commons, *Housing for Older People: Second Report of Session 2017-19*, 5 February 2018.

²⁰ Claudia Wood for Demos, *The Top of the Ladder*, 2013.

homes for market purchase or to rental properties. For the purpose of the analysis below, the process of downsizing cuts across all tenures.

Life-staging modelling accounting for downsizing

196. In order to account for downsizing in the proposed dwelling mix, we adjust the occupancy pattern of the District by first considering the degree of under-occupation among West Berkshire households and then applying the statistic quoted above, which found that 38% of people aged over 65 wish to downsize.
197. Table 6-16 below categorises one-person and one-family households in West Berkshire by occupancy rating, where an occupancy rating of 0 indicates that there are the same number of bedrooms in the dwelling as the number of bedrooms its occupants would require according to the 'bedroom standard' in the Housing (Overcrowding) Bill of 2003. An occupancy rating of -1 indicates overcrowding, and occupancy ratings greater than +1 indicate under-occupation: that there are more bedrooms in the dwelling than its occupants are expected to require.
198. We assume that households with an occupancy rating of +2 or higher are most likely to wish to downsize. As can be seen in the table below, the proportion of one-person households in all age brackets and the 65 and over age bracket are broadly similar. It is the family households aged over 65 who have a significantly higher tendency to under-occupy their homes: 73% have an occupancy rating of +2 or higher, meaning they have more than two spare bedrooms.

Table 6-16: West Berkshire occupancy ratings by age

	One person household: total		One person household: aged 65 and over		One family only: total		One family only: aged 65 and over	
Total households	16,123		6,820		42,638		5,302	
Occupancy rating of +2 or more	6,636	41%	3,150	46%	19,735	46%	3,882	73%
Occupancy rating of +1	5,272	33%	2,041	30%	14,175	33%	1,167	22%
Occupancy rating of 0	4,215	26%	1,629	24%	7,783	18%	253	5%
Occupancy rating of -1 or less	0	0%	0	0%	945	2%	0	0%

Source: ONS 2011

199. We next use this information to adjust the occupancy pattern of West Berkshire by seeing what it would look like if 38% of the 3,882 households aged over 65 with high occupancy ratings were able to downsize and had done so. 38% of 3,882 is 1,475. As these households have more than two spare rooms, we assume they occupy three-bedroom, four-bedroom and five- or more bedroom dwellings in equal numbers, and so deduct 492 households ($1,475 / 3$) from each of those occupancy categories, and distribute them equally between the three smaller categories of dwelling (one-bedroom homes, two-bedroom homes, and three-bedroom homes).
200. It is assumed that some households under-occupying dwellings of five or more bedrooms will wish to downsize to three-bedroom dwellings, and that households under-occupying three-bedroom dwellings will wish to downsize to one- or two-bedroom dwellings, so the three-bedroom group has 492 added to and deducted from it and so in effect remains static.
201. This process is repeated for the 3,150 one-person households aged over 65 who under-occupy their homes. Because it is less likely that one-person households occupy homes with five or more bedrooms, half this number (599) is deducted from the three- and four-bedroom groups and added to the one- and two-bedroom groups. In doing so we have effectively downsized the proportion of households likely to want to do so from among the households who currently under-occupy their homes to the greatest degree. This results in an adjusted occupancy pattern for the 65 and older age group.
202. In

203. Table 6-17 below, we present an amended version of the distribution of dwellings of different sizes occupied by West Berkshire residents according to the age of the HRP, which was originally presented in Table 6-11. Only the percentages in red have changed.

Table 6-17: Age of household reference person to size, 'downsized' (West Berkshire)

	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
1-bed	24%	13%	6%	7%	20%
2-bed	52%	41%	17%	16%	31%
3-bed	19%	36%	41%	41%	36%
4-bed	4%	9%	26%	26%	11%
5+ bed	2%	2%	10%	10%	2%

Source(s): MHCLG 2014-based household projections, ONS 2011, AECOM Calculations

204. We are now able to repeat the calculation that apportions the amended occupation pattern of West Berkshire to the projected number of households in Hungerford falling into each of these stages at the end of the Plan period in 2036.
205. Table 6-18 below takes the projection population falling into each age band, and then apportions those households among different sizes of dwellings according to the preferences expressed by households at District level, adjusted as though downsizing were a possibility for the households wishing to do so. This results in a dwelling mix that is less skewed toward larger dwellings. Because the number of 65 and over households is so significant, the relatively slight change to their occupation pattern has a relatively big effect on the overall dwelling mix.

Table 6-18: Ideal size distribution in Hungerford in 2036, with downsizing, by household life stage

	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over	Total
Population 2036	60	215	877	474	1,494	3,121
1-bed	14	28	57	34	297	431
2-bed	31	87	152	78	468	817
3-bed	11	77	359	192	539	1,179
4-bed	2	19	226	125	158	530
5+ bed	1	4	83	45	32	165

Source: Census 2011, AECOM Calculations

206. We are now able to compare Hungerford's housing mix in terms of size in 2011 with both the projected requirement based on the original estimates, and with the new estimates accounting for downsizing. This is presented in Table 6-19 below.
207. We can now see how the ideal dwelling mix would look if the District occupation patterns used in the calculation did not limit the possibility of downsizing among older age groups. There has been a moderate increase in the number of one- and two-bedroom dwellings required, while three-bedroom dwellings have remained relatively unchanged, and the proportion of larger dwellings has declined.

Table 6-19: Size distribution in 2011 compared to ideal distribution in 2036 (Hungerford), with downsizing

Number of bedrooms	2011		2036		2036 (adjusted)	
1-bed	309	12%	325	10.4%	431	14%
2-bed	732	28.3%	711	22.8%	817	26%
3-bed	1,019	39.4%	1,237	39.6%	1,179	38%
4-bed	411	15.9%	636	20.4%	530	17%
5+ bed	114	4.4%	213	6.8%	165	5%
Total households (not counting those with 0 bedrooms)	2,585		3,121		431	

Source: Census 2011, AECOM Calculations

208. Table 6-20 again sets out the misalignment between the current stock in the NA and future demand for housing of different sizes, based on the preferences expressed by households at different life-stages with downsizing taken into account. The result is a more balanced mix of dwelling sizes, with one-bedroom homes now the second most common category, and five- or more bedrooms the least most common.

Table 6-20: Misalignments of supply and demand for housing, with downsizing

Number of bedrooms	2011	2036	Change to housing mix	Recommended split
1-bed	309	325	122	22.7%
2-bed	732	711	85	15.8%
3-bed	1,019	1,237	160	29.9%
4-bed	411	636	119	22.1%
5+ bed	114	213	51	9.5%

Source: AECOM Calculations

209. What emerges from this exercise is a recommendation that many more one-bedroom units be supplied, with a moderate number of two-bedroom dwellings, and fewer larger dwellings than in the previous calculation.

Table 6-21: Dwelling mix needed over the remainder of the Plan period, with downsizing

Number of bedrooms	Recommended split	Additional dwellings required 2018-2036	Additional dwellings, with downsizing
1-bed	2.8%	14	111
2-bed	0%	0	77
3-bed	39.2%	191	145
4-bed	40.3%	196	107
5+ bed	17.7%	86	46

Source: AECOM Calculations

210. It is important to again caveat this conclusion, noting that the downsizing adjustment exercise is merely a model that relies on a series of assumptions that may not match with reality. In order to complement this exercise and check whether its assumptions are correct and its outcomes reflect the ideal occupation patterns expressed by Hungerford residents, it is highly recommended to gather additional sources of data, such as household surveys, about the desire and ability of Hungerford residents to downsize to smaller properties, when planning for the future dwelling mix.

6.7 Type

211. The type of home (detached, semi-detached, terraced or flat) is a matter more of taste than need and is therefore of secondary importance in the context of a Housing Needs Assessment. That said, the housing types that are most likely to meet the needs of the Hungerford demographic profile, based on current patterns of occupation, are detached and semi-detached homes, with a rising number of flats and maisonettes required as the population ages. Additionally, bungalows tend to appeal to an ageing population, despite not being well-represented in current occupation patterns due to limited available stock, and should be promoted so as to meet the demands of a growing elderly population in the NA.

6.8 Conclusions

212. Hungerford's stock of existing housing is made up of smaller dwellings than that of the wider District. There are higher proportions of terraced houses and flats in Hungerford than West Berkshire, and a lower proportion of detached houses. Accordingly, 38% of Hungerford households occupy dwellings of four rooms or fewer, compared with 26% in West Berkshire. In terms of bedrooms, Hungerford households are 27% more likely to live in one- to two-bedroom dwellings than their counterparts in the wider District, and 41% less likely to live in dwellings of five bedrooms or more.
213. The housing stock reflects the composition of households at NA and District levels: Hungerford has a much higher proportion of one-person households, while West Berkshire has a higher proportion of families with dependent children (features that are evident overall, and within every age category). Hungerford has a higher share of older residents, while West Berkshire has a higher proportion of younger ones. Hungerford's share of households aged 65 and over increased at twice the rate of West Berkshire's over the intercensal period, and the population of 16-44 year olds declined.
214. Having established this context, we gathered data on the projected population of the District by age, as well as the propensity of households in particular age bands to occupy particular sizes of dwelling. Applying this information to the demographic profile of Hungerford itself affords a reasonable estimate of the age structure of the town at the end of the Plan period, and the sizes of dwellings that its future population are likely to want to occupy.

215. Hungerford's demographic profile in 2036 is dominated by households aged 65 and over (which make up 48% of all households), followed by those aged 35 to 54 (28%), those aged 55 to 64 (15%), and the combined categories aged below 34 (9%). Generally speaking, the age bands most likely to occupy larger dwellings are strongly represented, and those most likely to occupy smaller dwellings are not well represented. Although households aged 65 and over have begun to shift towards mid-sized dwellings, they still occupy dwellings of four or more bedrooms at twice the rate of households aged 25 to 34.
216. Given that Hungerford's current dwelling stock is made up of smaller dwellings compared with the District, and that the town's projected population is likely to wish to inhabit larger dwellings, it is logical that the recommended dwelling mix at the end of the Plan period is skewed towards the provision of three- and four-bedroom homes.
217. However, a further analysis has been undertaken to adjust for the limitations of the data relating to the occupation patterns of the district, where the available stock of housing is insufficient to permit downsizing by older households at the rates seen elsewhere and expressed in various studies.
218. This additional analysis produces a dwelling mix that is far more balanced and less weighted towards larger dwellings. This dwelling mix is closer to what should be provided in Hungerford in order to permit older households in larger dwellings to downsize, and has the additional benefit of allowing newly forming households to access housing through smaller and more affordable dwellings.
219. Hungerford's ageing population also offers a chance to listen closely to local needs and further amend the planned dwelling mix if it is discovered (e.g. through a household survey) that more households would like to downsize in future than is suggested by the occupation preferences evident at the District level.

7. RQ 3. Tenure

RQ3: What Affordable Housing and market tenures should be included in the housing mix?

7.1 Background and definitions

220. Tenure refers to the legal arrangements in place that enable a household to live in their home; it determines their rights and influences the payments that are to be made in return for these rights. Broadly speaking, tenure falls into two categories: Affordable Housing (AH), in which households receive some sort of subsidy to enable them to live in their homes; and market housing, in which they do not.
221. We will address this question by examining the tenure of dwellings in the current stock and recent supply, and make an assessment, based on a reasonable interpretation of the evidence we have been able to gather, whether the continuation of these trends would meet future needs. Alternatively, we may identify that misalignments exist between the supply of different tenures of housing and local need. Such misalignments can justify policies that guide new development to prioritise certain tenures, so as to bring supply and demand into better alignment.²¹
222. It is necessary at this stage of the study to make clear the distinction between Affordable Housing in planning terminology and the colloquial meaning of the phrase. In the course of this study, we refer to Affordable Housing, abbreviated to 'AH'. We mean by this those forms of housing tenure that fall within the definition of Affordable Housing set out in the current National Planning Policy Framework (NPPF): Social Rent, Affordable Rent, Affordable Private Rent (brought forward by Build to Rent schemes) and forms of AH designed to offer affordable routes to home ownership such as shared ownership, Starter Homes and discounted housing for market sale.²² To distinguish this from the colloquial definition of homes that are broadly within reach for the majority of the population, we refer to the latter as affordable market housing.
223. The definition of AH set out in the NPPF makes clear the government's commitment to home ownership but recognises the important role of Social, Affordable and Private Rent tenures for those not currently seeking home ownership.
224. It is important to note however that the 2012 version of the NPPF refers to the 'national rent regime' not 'Government's rent policy'. It has been suggested that this change in wording may give central Government, and by extension local authorities, wider flexibility in arriving at social rents.²³
225. The revisions seek to broaden the definition of AH to include a range of low-cost housing opportunities for those aspiring to own a home, including Starter Homes.
226. In paragraph 64 of the revised NPPF, Government introduces a recommendation that '*where major housing development is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership.*' In line with PPG,²⁴ the assumption should be that 'major housing development' can be defined as sites of more than 10 units, and that affordable home ownership includes Starter Homes, Shared Ownership homes and homes available for discount market sale.

7.2 Current tenure profile

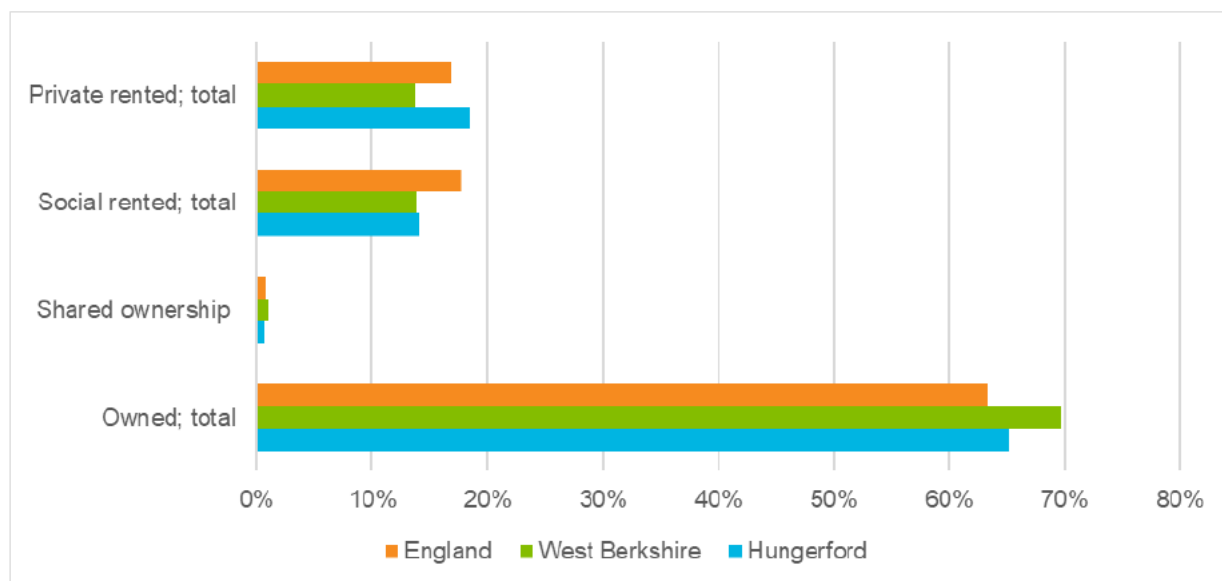
227. In order to set a baseline for our examination of tenure, it is necessary to present the current tenure profile of the NA based on the most recent reliable data. Figure 7-1 below presents Census data from 2011, which shows that Hungerford's tenure profile is in general alignment with West Berkshire, apart from a moderately higher rate of private renting and lower level of ownership.

²¹ PPG Paragraph: 021 Reference ID: 2a-021-20160401

²² NPPF, July 2018

²³ McGready, B, Affordable Housing and Planning, MBL seminars, April 2018

²⁴ PPG 031 Reference ID: 23b-031-20161116

Figure 7-1: Tenure (households), 2011

Source: Source: ONS 2011, AECOM Calculations

228. It is also important to consider how Hungerford's tenure profile has evolved over time. Table 7-1 below shows how tenures have evolved between the 2001 and 2011 census. The number of households owning their homes has decreased by 2.3% compared with West Berkshire's 2.2% increase and stagnation throughout England. Shared ownership has declined dramatically but from a very low base. The increase in social renting at 4% is less than the District at 8.8%, but both increased contrast with a contraction of 0.9% nationwide. The most significant finding is a 90.5% increase in private renting, although this is in line with the national trend and slightly below the rate of growth observed for the wider District.

Table 7-1: Rates of tenure change, 2001-2011

Tenure	Hungerford	West Berkshire	England
Owned; total	-2.3%	2.2%	-0.6%
Shared ownership	-51.5%	70.8%	30.0%
Social rented; total	4.0%	8.8%	-0.9%
Private rented; total	90.5%	111.0%	82.4%

Source: Source: ONS 2001 and 2011, AECOM Calculations

7.3 What quantity of Affordable Housing is required in the NA over the Plan period?

229. In **Error! Reference source not found.** below we put forward calculations, using PPG as a starting point,²⁵ to provide an estimate of the need for additional AH over the Plan period. The accuracy of the findings generated by the model is only as strong as the evidence we have available to us. For example, the Census 2011 is increasingly out-of-date and ideally more recent data relating to overcrowding and concealment would be helpful. However, given the test of proportionality for neighbourhood planning, and the need to conform with Local Authority strategic policies, the calculations set out in **Error! Reference source not found.** provide a sound basis for both understanding and planning for community need for AH.
230. The table shows that, there are currently about 489 households in Hungerford who are unable to access tenures suitable to their needs. The table suggests that, over the Plan period, a further 95 households will fall into need, producing a total AH need of 584 dwellings that should be addressed over the Plan period.
231. The appropriate policy response to this is therefore for Hungerford to seek for a higher proportion of newly built dwellings to be AH than would be provided for by the West Berkshire policy target.
232. To eradicate the shortfall in its entirety would require an AH policy that requires all new residential dwellings to be AH. This is however clearly not possible, as AH is typically brought forward and made financially viable by its inclusion in

²⁵ Paras 024-026 Reference ID: 2a-026-20140306

small amounts within larger market developments. However, it will be worth Hungerford Town Council exploring other ways of bringing forward AH, for example through exception sites or community land trusts.

233. It should be noted that this number is largely dependent on information provided by West Berkshire District Council (WBDC) about their Common Housing Register. As that data cannot be broken down by priority banding, and includes those not living in Hungerford but wishing to do so, it is likely an inflated total. In turn the total AH need for Hungerford may be somewhat lower than the 584 dwellings identified here.

Table 7-2: Affordable Housing model

Step	Stage	Source	Calculation	Stage and Step Description
1. CURRENT HOUSING NEED (GROSS)				
a	Homeless households	ONS Census 2011 (QS101EW - Residence type)	0	
b	Need on housing register	WBDC	451	Drawing data from the Common Housing Register managed by WBDC, we have been advised the number of people wishing to bid on social properties in Hungerford comes to 451. The figure is not limited to those already living in Hungerford or with a strong connection to the town, but includes other households not living in Hungerford who selected Hungerford as their preferred location. The number is also not able to be broken down by priority banding. Due to these two factors, the number is likely to be inflated, but WBDC have stated that it is the most accurate representative figure available.
c	Overcrowded households	Census 2011	17	We assume that number remains the same as in 2011 in which the Parish recorded 17 households with more than one person per room; and that these households are not on the Housing Needs Register.
d	Concealed households	Census 2011	21	We assume that number remains the same as in 2011 in which the Parish recorded 21 households who were concealed; and that these households are not registered on the Housing Needs Register.
f	Backlog need	AECOM	489	Sum of stages a-d
2. NEWLY ARISING NEED				
g	Number of households in 2011	Census 2011	2,600	
h	Annual household formation between 2011 and 2036	2014-based HHP; AECOM Calculations	16	Taking households in 2011 in the NA as a proportion of all households in the District (4.17%); Hungerford's share of District households in 2036 will be 2,998 (rounded), an increase of 398 since 2011; which is an annual increase of 16 households (rounded) (398 / 25 years).
i	New household formation between 2011 and 2018	AECOM Calculations	112	$h \times 7$ (no. years between 2011 – 2018)
j	Estimated current number of households	AECOM Calculations	2,712	Sum of g + i
k	New household formation between 2018 and 2036	AECOM Calculations	288	$h \times 18$ (no. years between 2018 – 2036)
l	Proportion of newly forming households unable to access market housing	AECOM Calculations	33%	On account of the lack of income data available at the parish level, the formula used to arrive at the proportion of households that come into existence unable to access market housing is the number of households in social housing at the time of the 2011 Census (383) + backlog need (489) divided by all households (2,600).

m	Newly Arising Need	AECOM	95	k x l
n	TOTAL AFFORDABLE HOUSING NEED		584	
3. THE TOTAL CURRENT SUPPLY OF AH				
o	Current occupied stock	Census 2011	383	
p	Vacant units (surplus stock)	LPA	0	This data is not collected by the LPA and there has been an increase in demand, so we assume this to be 0.
q	AH built between 2011 and 2017	LPA Monitoring reports	98	Since the 2011/12 year, Hungerford has seen approximately 98 dwellings built in the neighbourhood area.
r	Units taken out of management	Census 2011	0	Assume continuation of past trends; given the increase in AH during the 2001-11 inter-censal period, we assume no units will be removed from management over the Plan period.
s	Total AH stock		491	Sum of o-r
t	PROJECTED REQUIREMENT OVER THE PLAN PERIOD		584	This model estimates there will be a need for 584 additional AH dwellings during the Plan period.

7.4 Affordability

234. This section details the affordability requirements for each tenure in Hungerford, with reference to average incomes, in order to assess which tenures of housing are within reach for the local population, and what future supply should look like. The key assumptions made in assessing the affordability of different tenures are explained alongside the calculations below.

7.4.1 Income

235. Incomes are considered first, as they have an important relationship with the ability of households to exercise choice in the housing market and the level of need for affordable housing products. For this, we use estimates of average household incomes for 2015/16 published by ONS at the Middle-layer Super Output Area (MSOA). Hungerford's parish boundary matches exactly an MSAO geography.

236. The net annual household income before housing costs (equalised) in 2015/2016 was **£35,900**, while the total annual income was **£49,300**.²⁶

7.4.2 Market housing

237. To determine affordability in market housing, we consider two primary indicators, 'Purchase Thresholds' (PT), which denote the standard household income requirement to access mortgage products, and 'Income Thresholds' (IT), which denote the maximum share of a family's income that should be spent on accommodation costs.

Market sales

238. The PT examines affordability for market homes. In this sub-section, we consider two measures of housing price: the average (mean) house price, and the lower quartile (LQ) house price. The LQ house price is the price below which the cheapest 25% of houses may be bought and is a measure of 'entry-level' property in the area (cheaper, more affordable housing).²⁷ Nonetheless, an entry-level dwelling can also be understood as one suitable for a household comprising two or three individuals. In order to conform with the Government guidance on overcrowding, such a home would require three habitable rooms (a flat or house with two bedrooms). Entry-level properties can therefore also be understood as two-bedroom flats/houses.

239. To determine the price of market sale homes, we calculated the average price of houses sold in Hungerford in 2017, using Land Registry data (

²⁶ Total annual household income is the sum of the gross income of every member of the household plus any income from benefits such as Working Families Tax Credit.

²⁷ Definition of 'entry-level' taken from <https://www.ons.gov.uk/visualisations/dvc393/affordabilitycalculator/content.html>

240. Table 7-3 below).

Table 7-3: Average prices for market sale homes

Average	Price Hungerford	Price West Berkshire
Mean	£316,684	£394,240
Median	£286,250	£335,000
Lower quartile	£233,125	£265,000
Max	£1,118,250	£4,000,000
Min	£92,500	£80,000

Source: Land Registry, 2018

241. The PT is calculated by discounting 10% of the house price to reflect a mortgage deposit. The resulting cost is then divided by 3.5.²⁸
242. The PT for the average property price is $£316,684 \times 10\% = £31,668$; $£316,684 - £31,668 = £285,016$; $£285,016 / 3.5 = £81,432$. A single person would need to be earning £81,432 annually to afford an average priced property.
243. The PT for an entry-level property is $£233,125 \times 10\% = £23,313$; $£233,125 - £23,313 = £209,812$; $£209,812 / 3.5 = £59,946$. A single person would need to be earning £59,946 annually to afford an entry-level property (excluding deposit saved). This accords with the finding of the Berkshire SHMA, which calculates that the indicative household income required to purchase a lower quartile property in West Berkshire is £60,600.

Private rented sector (PRS)

244. The IT examines affordability for rental market homes. Again, we consider two measures of price: the average rent price and the LQ rent price. However, data is not available for long-term trends at the NA scale, making it impossible to calculate LQ rent price. Nonetheless, as mentioned above, an entry-level dwelling can also be understood as two-bedroom flats/houses. A search of properties available for private rent was made on www.rightmove.com, with the search radius presented in Figure 7-2 below.

Figure 7-2: Hungerford rental market radius

Source: <https://www.rightmove.co.uk>

245. There were 28 properties listed as for let or let agreed at the time of search. The average rental price for each size of property, with the number in the sample, is presented in Table 7-4 below. Because the sample size is relatively small, alongside the Rightmove data for Hungerford is equivalent average rental data for the wider RG17 postcode from Home.co.uk, which can be used to sense check the results.
246. Because the average rents for one-, two- and three-bedroom properties are very similar between the two geographies, the more specific Hungerford data is deemed accurate and will be used going forward. The RG17 data

²⁸ Lending criteria: How much a mortgage provider is prepared to lend you (how many times income).

for four-bedroom properties gives a much lower average rent than for Hungerford. This may be due to the inclusion of one anomalous £4,500 listing in the Rightmove data, which, if excluded, leaves an average of £1,842 that is more in line with the RG17 data, and will be used going forward. This correction is given in red.

Table 7-4: Property rents in Hungerford by number of bedrooms

	Hungerford no. of properties	Hungerford average monthly rent	RG17 no. of properties	RG17 average monthly rent
1-bed	6	£671	9	£624
2-bed	10	£792	8	£827
3-bed	5	£1,314	11	£1,297
4-bed	7, 6	£2,221, £1,842	6	£1,799

Source: <https://rightmove.co.uk>, <https://www.home.co.uk>

247. We now determine the income needed to afford market rents. The IT is derived through the annualisation of the monthly rental cost. For the purpose of this exercise and in line with the SHMA, affordability is defined as spending 25% of income on housing costs.²⁹
248. The annualised average rents for each size of property in Hungerford is given in Table 7-5 below, along with the income threshold needed to afford it, with no more than 25% of income spent on rent.

Table 7-5: Annualised Hungerford rents and income thresholds

	Annualised rent	Required income threshold
1-bed	£8,052	£32,208
2-bed	£9,504	£38,016
3-bed	£15,768	£63,072
4-bed	£22,104	£88,416
Average all sizes	£13,857	£55,428

Source: <https://rightmove.co.uk>, AECOM Calculations

249. The average annual rent for Hungerford is £13,857, and the income threshold is therefore £55,428.
250. The average annual entry-level rent in Hungerford is £9,504, and the income threshold is therefore £38,016.
251. This is significantly higher than the indicative household income required for lower quartile private renting in West Berkshire of £22,300 identified in the SHMA. However, the SHMA adopts an approach in which no more than 35% (rather than 25%, as here) of income should be spent on rent, and the figures given above are average entry-level rents, not LQ entry-level rents. Using the LQ rental price across all dwelling sizes in Hungerford (£750 per month or £9,000 per year) at an income percentage of 35%, results in a required income threshold of £25,714. On this like-for-like basis, Hungerford LQ rents remain 15% more expensive than for West Berkshire as a whole

7.4.3 Affordable Housing

252. The tenures that constitute the new definition of AH within the NPPF (2018 version) are: Social Rent and Affordable Rent, Starter Homes, Discounted Market Sales Housing, and other affordable routes to home ownership.
253. This variety of AH tenures reflects an ambition by the Government to provide a pathway to home ownership to those who seek it, as well as introducing market principles into the provision of subsidised housing for rent. The aim is to divide AH into a series of products designed to appeal to different sectors of the market and, by changing eligibility criteria, bring rents closer in line with people's ability to pay.
254. A good example is the introduction of dwellings for Affordable Rent in 2012. Rent for this tenure is set at up to 80% of market rent, with the intention that the additional income is used to help fund the development of new homes. Labelled an 'intermediate' product, this would be suitable for people with an income that precludes them from eligibility for Social Rent dwellings (those dwellings where the rent is set in accordance with the Government's rent policy), but who cannot afford to access the private market.

²⁹ SHMA 2012, "A household is considered able to afford market housing in cases where the rent payable would constitute no more than 25% of their gross household income"

255. The overall aim of the introduction of this type of tenure is to reduce the size of the group who are eligible for Social Rent dwellings to those who have, relatively speaking, very low household incomes. However, within this segment, market principles also apply given the link between rents and size of dwelling, with a strong financial incentive for households to only occupy a dwelling deemed suited to their composition, based on an 'occupancy rating' formula set by the Government.

Social Rent

256. Rents in socially rented properties reflect a 'formula rent' based on a combination of individual property values and average earnings in each area, maintaining substantial discounts to market rents. As such, it is suitable for the needs of those on low incomes, and is subject to strict eligibility criteria.
257. To determine Social Rent prices we have used the Statistical Data Return (SDR) from the Regulator of Social Housing. This data is only available at the District level, but operates as an acceptable proxy for Hungerford given the shared demographic and employment characteristics identified in this study between the two geographies. SDR provides data about rents and the size and type of stock owned and managed by Private Registered Providers (PRPs) and is presented in Table 7-6 below.

Table 7-6: West Berkshire Social Rent levels

Size	1 bed	2 beds	3 beds	4 beds	All ³⁰
Average weekly rent (excluding IR, AR and HIST)	£97	£117	£128	£143	£118
Average Social Rent PCM	£417	£503	£550	£615	£508
Annual average	£5,005	£6,037	£6,605	£7,379	£6,093
Income needed	£20,021	£24,149	£26,419	£29,515	£24,374

Source: HCA, AECOM Calculations

Affordable Rent

258. Commentators have repeatedly raised concerns about Affordable Rent not constituting a realistic form of AH given that in many areas this reduces rent to levels that are still beyond the means of the target group: those on incomes substantially below the mean.
259. To determine Affordable Rent prices we can also use the SDR. The data is presented in Table 7-6 below.

Table 7-7: West Berkshire Affordable Rent levels

Size	1 bed	2 beds	3 beds	4 beds	All ³¹
Average weekly rent (excluding those subject to HIST)	£123	£148	£179	£187	£149
Average Affordable Rent PCM	£529	£634	£768	£804	£642
Annual average	£6,351	£7,614	£9,220	£9,642	£7,708
Income needed	£25,404	£30,454	£36,880	£38,570	£30,833

Source: HCA, AECOM Calculations

Intermediate tenures

260. The term intermediate housing describes homes for sale and rent provided at a cost above social rent, but below market levels, subject to the criteria in the Affordable Housing definition above. This can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not Affordable Rent.
- **Starter Homes**
261. A Starter Home is a new build home with a value not exceeding £250,000 outside London and £450,000 inside the city, which is eligible only for first time buyers aged under 40.
262. The Housing and Planning Act 2016 (HPA) includes provisions to introduce a general duty on planning authorities in England to promote the supply of Starter Homes, and a specific duty to require a minimum number or proportion of Starter Homes on certain residential development sites. In paragraph 64 of the NPPF18, the Government introduces a recommendation that, "where major housing development is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership."

³⁰ Weighted average

³¹ Weighted average

263. This is a fulfilment of the direction of travel set in the Housing White Paper. It states that, "in keeping with our approach to deliver a range of affordable homes to buy, rather than a mandatory requirement for 'Starter Homes,' we intend to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units. It will be for local areas to work with developers to agree an appropriate level of delivery of 'Starter Homes', alongside other affordable home ownership and rented tenures."
264. This is a substantial watering-down of the Starter Home requirement as envisaged when policy contained in the Housing and Planning Act was first conceived. In effect, it leaves it to local groups, including neighbourhood plans, to decide and promote an appropriate level of affordable home ownership products, while taking note of the 10% policy expectation.
265. The decision whether to treat Starter Homes as AH should be determined by whether lowering the asking price of new build homes of a size and type suitable to first time buyers by 20% would bring them within reach of people currently unable to access affordable market housing for purchase.
266. In order to provide a conservative assessment of the suitability of Starter Homes, we propose to use the value we have estimated for an entry-level dwelling of £233,125.
267. Applying a discount of 20% results in an approximate selling price of £186,500. Allowing for a 10% deposit further reduces the value of the property to £167,850. The PT at a multiple of 3.5 is £47,957.

- **Shared ownership**

268. There were just 16 households living in shared ownership dwellings in Hungerford at the time of the 2011 Census which, as we have seen, represents a 51.5% contraction on the 33 households doing so in 2001. Despite the relatively low and falling incidence of the shared ownership tenure, it is worth considering its future role.
269. Shared ownership involves the purchaser buying an initial share in a property, typically between 25% and 75%, and paying rent on the remaining share retained by the provider. Shared ownership is flexible in two respects: in the share which can be purchased and in the rental payable on the share retained by the provider. Both of these are variable.
270. The share owned by the leaseholder can be varied by 'staircasing'. Generally, staircasing will be upward, thereby increasing the share owned over time. In exceptional circumstances (as a result of financial difficulties, and where the alternative is repossession), and at the discretion of the provider, shared owners may staircase down, thereby reducing the share they own. Shared equity is available to first-time buyers, people who have owned a home previously, and council and housing association tenants with a good credit rating whose household income does not exceed £60,000.
271. To determine the affordability of shared ownership, calculations are based on the entry-level house price in Hungerford (£233,125). The amount of the deposit available to the prospective purchaser is assumed to be 10% of the value of the dwelling, and the standard loan to value ratio of 3.5 is used to calculate the income required to obtain a mortgage. The income required to cover the rental component of the dwelling is based on the assumption that a household spends no more than 25% of the income on rent (as for the IT for PRS).
272. A 25% equity share of £233,125 is £58,281, from which a 10% deposit of £5,828 is netted off. The mortgage value of £52,453 (£58,281 – £5,828) is then divided by 3.5. To secure a mortgage of £52,453, an annual income of £14,987 (£52,453 / 3.5) is therefore needed. In addition to the mortgage costs, rent is charged on the remaining 75% shared ownership equity, the unsold value of £174,844. An ongoing annual rent equivalent to 2.75% of the value of the unsold equity is assumed, which is £4,808 and requires an income of £19,232. Therefore, an income of around £34,219 (£14,987 + £19,232) is required to afford a 25% shared equity purchase of an entry-level dwelling.
273. The same calculation is reiterated for different initial share levels and the results are presented in Table 7-8 below:

Table 7-8: Affordability calculator for shared ownership

Purchase price:	£233,125	Minimum income needed	Mortgage	Income needed for mortgage	Annual Rent	Income needed for rent	Deposit required
Initial share	25%	£34,219	£52,453	£14,987	£4,808	£19,233	£5,828
	35%	£37,650	£73,434	£20,981	£4,167	£16,668	£8,159
	40%	£39,365	£83,925	£23,979	£3,847	£15,386	£9,325
	50%	£42,795	£104,906	£29,973	£3,205	£12,822	£11,656
	60%	£46,225	£125,888	£35,968	£2,564	£10,258	£13,988
	75%	£51,371	£157,359	£44,960	£1,603	£6,411	£17,484

Source: AECOM Calculations

Conclusion

274. We are now able to directly compare the cost of market rent, market purchase, Social Rent, Starter Homes, Shared Ownership at 25%, 50% and 75%, and Affordable Rent in Hungerford, and the level of income needed to afford these tenure options.

275. Table 7-9 below summarises the annual cost of different tenures and the income required to support these costs.

Table 7-9: Affordability thresholds (income required)

Tenure	Cost of purchase	Annual rent	Deposit	Income Required
Social Rent - average	-	£6,093	-	£24,374
Affordable Rent - average	-	£7,708	-	£30,833
Shared ownership (25%)	£52,453	£4,808	£5,828	£34,219
Market rent - entry-level	-	£9,504	-	£38,016
Shared ownership (50%)	£104,906	£3,205	£11,656	£42,795
Starter Homes	£186,500	-	£18,650	£47,957
Shared ownership (75%)	£157,359	£1,603	£17,484	£51,371
Market rent	-	£13,857	-	£55,428
Entry level market sale	£233,125		£23,313	£59,946
Market sale	£316,684		£31,668	£81,432

Source: AECOM Calculations

276. The income required to afford these different tenures is then benchmarked against the average gross annual household income of £49,300 and the average net annual household income before housing costs of £35,900. Figure 7-3 shows that households earning around the average net household income can only afford the following tenures: Social Rent, Affordable Rent, and shared ownership (25%).

277. We have estimated that 489 Hungerford households are currently unable to access market housing, and that a further 95 households will be in need of AH over the plan period. If the Housing Needs Figure of 486 dwellings is provided over the Plan period in accordance with the Core Strategy's CS6 affordable housing policy (with the majority of sites being required to deliver 30% AH, the site east of Salisbury road in Hungerford required to deliver 40% AH of its 100 units, and smaller sites brining forward lower percentages of AH – roughly averaging 30% overall) a total of 148 AH units (rounded) and 345 market units will be delivered. This is deemed not to meet the needs of the population for AH.

278. There is a severe lack of suitably affordable housing for the population of Hungerford, and every effort should be made to maximise AH provision going forward, while ensuring that overly ambitious targets do not imperil the viability of new development in general. It may also be possible that other types of tenure may be able to alleviate the need for AH in Hungerford.

279. Hungerford has an incidence of home ownership that is slightly above the national average, but lower than the wider District, while the proportion of households renting privately is significantly higher than the District, and the proportion renting socially is slightly higher than the District. Over the intercensal period, the frequency of ownership and shared ownership decreased, while the frequency of private and social renting increased.

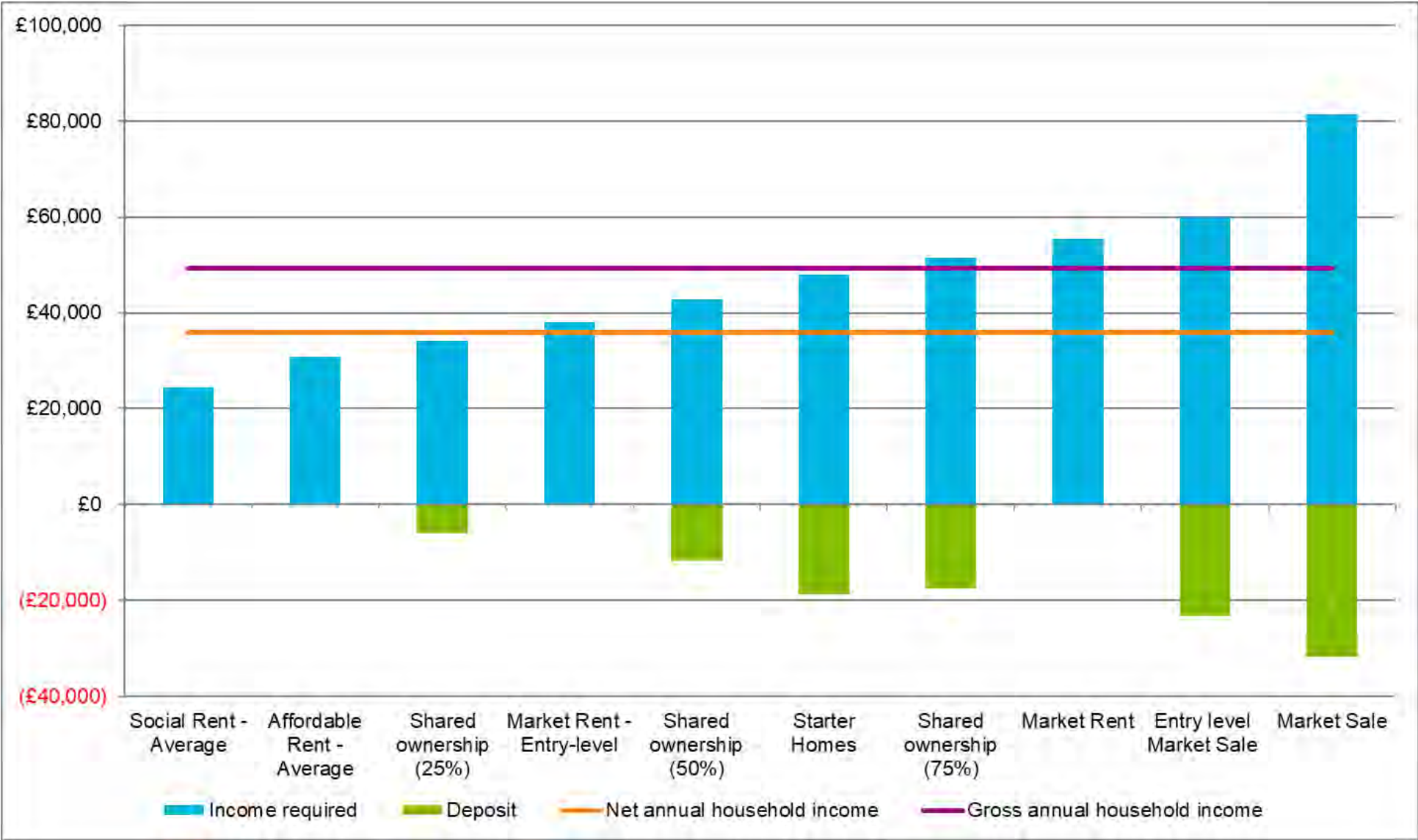
280. Although average annual net household incomes before housing costs are relatively high at £35,900, this level of income is insufficient to occupy the majority of dwelling tenures according to our affordability analysis.

281. Given the 90.5% growth in private renting between 2001-2011, it is likely that the provision of this tenure is growing to meet demand from those priced out of ownership, as average market rental properties require a lower income level than do entry-level market properties for sale. Entry-level market renting is only just out of reach for the average earning household, and so may be able to meet the needs of some households if the supply of dwellings for market rent increases in step with demand.

282. However, shared ownership at a 25% share is attainable to those on average incomes. In light of the reduction of households occupying this tenure over the intercensal period, it should be considered whether increasing the supply of shared ownership properties would help to reduce affordability pressures for many households.

283. Delivering more affordable houses to be sold would also reduce pressure on the PRS in Hungerford, which is becoming a more popular option over time, but which at average rents is out of reach for many households.

Figure 7-3: Hungerford household income and affordability of housing tenures



Source: AECOM Calculations

7.5 Conclusion

284. There are currently about 489 households in Hungerford who are unable to access tenures suitable to their needs, with a further 95 households projected to fall into need over the Plan period, producing a total AH need of 584 dwellings that should be addressed over the Plan period.
285. An appropriate policy response to this may be for Hungerford to seek for a higher proportion of newly built dwellings to be AH than would be provided for by the West Berkshire policy target.
286. It should be noted that this number is largely dependent on information provided by West Berkshire District Council (WBDC) about their Common Housing Register. As that data cannot be broken down by priority banding, and includes those not living in Hungerford but wishing to do so, it is likely an inflated total. In turn the total AH need for Hungerford may be somewhat lower than the 584 dwellings identified here.

The tenure split

287. In terms of the tenure split of Affordable Housing, it is important to note the affordability crisis that exists among households with below average incomes in Hungerford, who are only able to afford Social Rented, Affordable Rented, and Shared Ownership at a 25% share accommodation. For this reason, we recommend that AH provision should focus on dwellings for Social and Affordable Rent.
288. Having said this, such policies should in practice be flexibly applied given the need for viability. This question is particularly pertinent in rural locations where small in-fill schemes predominate. For these schemes, providers sometimes reject Social Rented stock due to relatively high maintenance costs, seeking to vary the tenure to Affordable Rent or shared ownership. As we have seen, both of these tenures provide viable options for Hungerford households, and should be well-represented in the dwelling mix.
289. We would recommend Starter Homes be delivered in the NA, in accordance with the Government's 10% policy expectation, but recommend a greater focus on the fast-growing shared ownership tenure, for reasons noted above.
290. On the basis of the evidence we have gathered, the following split of AH tenures is put forward:

Table 7-10: Tenure split (Affordable Housing)

Routes to home ownership, of which	30%
Starter Homes	10%
Shared ownership	20%
Affordable Housing for rent, of which	70%
Social Rent	40%
Affordable Rent	30%

Source: AECOM calculations

8. RQ 4. Specialist housing

RQ4: What provision should be made for specialist housing for older people within the NA?

291. The following section considers the specific needs associated with older people in Hungerford and projections about how those needs might change in future. To do so, we draw upon available secondary data on existing provision rates, the outputs of demographic modelling, and the use of a tool recommended by the Housing Learning and Improvement Network (HLIN).
292. Older people typically occupy a broad range of accommodation, including both market housing and more specialist accommodation. Two main types of specialist accommodation for older people include sheltered housing and extra care housing (see Appendix A for definitions).
293. It is important to note that bed spaces in communal establishments such as live-in care homes are not included in the calculation below. Such dwellings occupy a different land-use class to other types of specialist housing for older people, and are subject to separate need calculations that are outside of the scope of this study, which is confined to the needs of 'private households'. That said, we will note the provision of such accommodation as it relates to the NA in question.

8.1 Current supply of specialist housing for older people in Hungerford

294. There are 201 bed spaces in specialist housing in Hungerford serving a 2011 population of 551 people aged 75 and above. This produces an actual rate of provision in the NA of 365 (rounded) dwellings per 1,000 of the population aged 75 and over.
295. These bed spaces, presented in Table 8-1 are spread across four communities, ranging from recently-built extra care apartment complexes to managed retirement housing in historic cottages for sale on the open market. There is also a 59-bed-space care home (Hungerford Care Home), however this does not supply the needs of 'private households' as noted above, and so will not be included in the calculation.
296. It is worth noting that retirement accommodation tends to be concentrated in towns rather than villages, so Hungerford's stock of retirement dwellings likely serves a catchment area wider than the population actually living within the town.

Table 8-1: Hungerford specialist housing bed spaces

#	Name	Description	Bed spaces	Type
1	Redwood House	25 1-bed and 21 2-bed apartments	67	Extra-care housing for social rent
2	Crown Mews	23 single occupancy flats and cottages	23	Managed retirement housing for leasehold sale
3	Lindley Lodge	14 1-bed and 14 2-bed apartments	42	Age-exclusive housing for social rent
4	Bearwater	34 2-bed flats/houses, 1 1-bed flat	69	Managed retirement housing for leasehold sale
Total bed spaces in Hungerford			201	

Source: <https://housingcare.org>, phone calls to each establishment

8.2 Future needs for specialist housing for older people in Hungerford

Modelling the change in the population over 75 by the end of the Plan period

297. Table 8-2 below identifies the growth in the population of residents over 75 between 2011 and 2036 in order to arrive at an estimate of the number of residents aged 75 and over in 2036.

Table 8-2: Modelled change in the population over 75 2011-2036

Year	2011		% Hungerford population in West Berkshire	2036 Projection	
Area	Hungerford	West Berkshire		Hungerford	West Berkshire
All ages	5,767	153,822	3.75%	6,240	166,400
75+	551	10,677	5.16%	1,238	24,000
% of 75+	9.55%	6.94%	-	19.85%	14.42%

Source: 2014-based Sub-national population projections, MHCLG and Census 2011 (ONS), AECOM calculations

298. The method we use to arrive at this number can only be an estimate given that MHCLG population projections do not provide data at the NA level. AECOM uses the following four-step method to arrive at the estimate:

- Using ONS population projections, we take the projected size of the total District population (166,400) and population aged 75 and over (24,000) at the end of the Plan period;
- Using Census 2011 data, we take the population size for Hungerford and West Berkshire together with the number of those aged 75 and over;
- We come to an estimate of the size of the total population living in Hungerford at the end of the Plan period by assuming it is the same proportion of the West Berkshire population as in 2011 (3.75%), which produces a number of 6,240;
- To arrive at an estimate of the 75 and over population in Hungerford at the end of the Plan period, we assume it is the same proportion of the West Berkshire population aged 75 and over as in 2011 (5.16%), which produces a number of 1,238.

This calculation results in an increase in the 75 and over population for both geographies of 124.7%. In West Berkshire, this amounts to an increase of 13,323, while in Hungerford it amounts to an increase of 687. However, this is merely a projection: it is likely that the rates of increase in the District and NA will be quite different. Indeed, between 2011 and 2011 the number of people aged 75 and over in Hungerford increased by 10% compared with a much faster rate of 21% in West Berkshire.

Quantity of housing needed for older people

299. In order to calculate the additional housing for older people required over the Plan period we first take into account any backlog need (i.e. the provision required by the current elderly population minus current stock levels) and the quantity needed to meet the needs of the growing population.
300. HLIN recommends that 251 specialist bed spaces per 1,000 of the 75 and over population is an appropriate minimum level of supply. That would indicate that for the 551 older people living in the NA at the time of the last census, 138 bed spaces would be required. Given that the current stock totals 201 units, there is currently no deficit. At 365 (rounded) per 1,000 of the elderly population, the current rate of provision is also well above the national average of 170.
301. However, at the end of the Plan period the total population of people aged 75 and over is expected to be 1,238. According to the recommendation of HLIN, the quantity of retirement dwellings needed to meet the needs of that projected population would be 311.
302. Hungerford should therefore plan for the provision of an additional 110 units over the remainder of the Plan period. This equates to an average of 6 per year, which is a reasonable minimum target considering Hungerford's current rate of provision, though it is likely that units will be supplied in higher numbers at less frequent intervals rather than at a continuous low level.

Type of housing needed for older people

303. Next, we break down the above quantity recommendation into the blend of specific types that will need to be provided. In arriving at an appropriate type breakdown for older people, we have applied HLIN's Strategic Housing for Older People Analysis (SHOP@) tool, which provides estimated levels of demand for each type per 1,000 of the 75 and over population.³² This tool is reproduced in Figure 8-1 below.

³² Housing LIN (2011) Strategic Housing for Older People: Planning, designing and delivering housing that older people want, available online at: <http://www.housinglin.org.uk/library/Resources/Housing/SHOP/SHOPResourcePack.pdf>

Figure 8-1: Older persons housing demand by type

FORM OF PROVISION	ESTIMATE OF DEMAND PER THOUSAND OF THE RELEVANT 75+ POPULATION
Conventional sheltered housing to rent	60
Leasehold sheltered housing	120
Enhanced sheltered housing (divided 50:50 between that for rent and that for sale) ³⁶	20
Extra care housing for rent	15
Extra care housing for sale	30
Housing based provision for dementia	6

Source: Housing LIN (2011)

304. Table 8-2 led to an estimate of the number of people aged 75 and over in 2036 of 1,238. According to our calculations, this will result in a need for an additional 110 bed spaces over the remainder of the plan period. The HLIN suggested breakdown of this number among the various HLIN types is given in Table 8-3 below:

Table 8-3: Detailed additional specialist housing provision 2013-2036

Form of provision	Provision per thousand	Provision per actual number
Conventional sheltered housing to rent	60	26
Leasehold sheltered housing	120	52
Enhanced sheltered housing (divided 50:50 between that for rent and that for sale)	20	9
Extra care housing for rent	15	7
Extra care housing for sale	30	13
Housing based provision for dementia	6	3

Source: Housing LIN, AECOM Calculations

305. Table 8-4 below gives a grouped breakdown of the housing categories presented in Table 8-3.

Table 8-4: Additional specialist housing provision 2018-2036 grouped by tenure

	Affordable	Market	Total
Adaptations, sheltered, or retirement living	26	53	79
Housing with care (e.g. extra care)	13	18	31
Total	39	61	110

Source: Housing LIN, AECOM Calculations

306. However, these results assume that the HLIN recommended blend is already in place for the 201 existing bed spaces, which it is not. So to arrive at the precise blend of types and tenures required, it is more accurate to compare the breakdown of the total mix required in 2036 (311) with the breakdown of types and tenures provided the current stock. This will allow any particular shortfalls to be identified.

307.

308. Table 8-5 below shows that there is in fact no further need for affordable housing with care. There are already 29 more units than HLIN recommends be provided. The quantity of adaptations, sheltered, or retired living bed spaces has also been adjusted slightly upward. The most important finding that was not revealed in Table 8-4 above is that there is a clear lack of market housing with care. However, as there is a surplus of Affordable Housing with care of 29 units, it is not proportionate to increase the total quantity of specialist housing needed by an additional 29 units (or 26% more than the initial total of 110). Instead, we recommend that all 31 new housing with care bed spaces be provided within the open market. A final recommendation, following that logic, is supplied in table below.

Table 8-5: Ideal specialist housing provision by tenure group minus current provision

Scenario	Provision	Affordable	Market	Total
Ideal provision in 2036	Adaptations, sheltered, or retirement living	74	149	223
	Housing with care (e.g. extra care)	38	50	88
	Total	113	198	311
Current (2019) provision	Adaptations, sheltered, or retirement living	42	92	134
	Housing with care (e.g. extra care)	67	0	67
	Total	109	92	201
Remaining deficit	Adaptations, sheltered, or retirement living	32	57	89
	Housing with care (e.g. extra care)	0 (-29)	50	50
	Total	32	107	139

Source: Housing LIN, AECOM Calculations

Table 8-6: Final recommendation for additional specialist housing provision to 2036

	Affordable	Market	Total
Adaptations, sheltered, or retirement living	26	53	79
Housing with care (e.g. extra care)	0	31	31
Total	26	84	110

Source: Housing LIN, AECOM Calculations

309. The total requirement for specialist housing for older people remains 110 additional bed spaces until 2036, broken down between the different types as shown in Table 8-6 above. We note that there is no obligation for these all to be provided within the NA itself and it may not be economically feasible to do so. There may also in future be Local Plan policies that address the distribution of such accommodation across the District that will have a bearing on provision in Hungerford. As such, these 110 specialist dwellings need not be thought of as a requirement within the Neighbourhood Plan housing target - rather, there will be some overlap between these dwellings and the target, depending on the number that could be provided within the NA itself. This specialist dwelling need is likely, therefore, to be split between the NA and the rest of the District, which will enable the elderly to live either within or as close to the NA as possible.

9. Conclusions

9.1 Overview

Table 9-1: Summary of factors affecting housing need in Hungerford

Factor	Evidence	Conclusion
Quantity	<p>West Berkshire's Local Housing Need, based on 2016-based household projections and 2017 affordability ratios, is 621 dwellings per year.</p> <p>The West Berkshire Core Strategy allocates 10,500 net additional dwellings in the District over the period 2006-2026, and 2,000 of these to the AONB spatial area of which Hungerford is the major location for development.</p> <p>Hungerford's population of 5,767 is 23% of the 24,900 people living in the key settlements of the AONB identified in the Core Strategy. On the basis of its share of the population, Hungerford's share of the 2,000 dwelling target is 463 dwellings, which is in turn 4.4% of the 10,500 total dwelling target.</p> <p>A market signals analysis is applied, looking at: economic activity, commuting patterns, migration, house prices and sales volumes, overcrowding, concealed households, and the housing delivery record of the District.</p>	<p>Applying this proportion of the District's housing needs to the more recent figure of 621 dwellings per year, gives Hungerford a Housing Needs Figure (HNF) of 27 dwellings, or 486 over the remainder of the Plan period.</p> <p>The HNF has not changed in the light of past completions delivered since the start of the Plan period in 2013, nor in response to the market signals analysis.</p>
Type and size	<p>Hungerford's stock of existing housing is made up of smaller dwellings than that of the wider District.</p> <p>38% of Hungerford households occupy dwellings of four rooms or fewer, compared with 26% in West Berkshire. In terms of bedrooms, Hungerford households are 27% more likely to live in one- to two-bedroom dwellings than their counterparts in the wider District, and 41% less likely to live in dwellings of five bedrooms or more.</p> <p>Hungerford has a much higher proportion of one-person households, while West Berkshire has a higher proportion of families with dependent children (features that are evident overall, and within every age category). Hungerford has a higher share of older residents, while West Berkshire has a higher proportion of younger ones. Hungerford's share of households aged 65 and over increased at twice the rate of West Berkshire's over the intercensal period, and the population of 16-44 year olds declined.</p> <p>Hungerford's demographic profile in 2036 is dominated by households aged 65 and over (which make up 48% of all households), followed by those aged 35 to 54 (28%), those aged 55 to 64 (15%), and the combined categories aged below 34 (9%).</p> <p>Generally speaking, the age bands most likely to occupy larger dwellings are strongly represented,</p>	<p>To satisfy the requirements of increasingly smaller and older households, but also to enable younger households to remain in the area, and maintain a balanced population, we recommend the following housing mix:</p> <ul style="list-style-type: none"> • 1-beds: 22.7%; • 2-beds: 15.8%; • 3-beds: 29.9%; • 4-beds: 22.1%; • 5-beds: 9.5%. <p>This is based upon a further analysis to adjust for the limitations of the data relating to the occupation patterns of the district, where the available stock of housing is insufficient to permit downsizing by older households at the rates seen elsewhere and expressed in various studies.</p> <p>This produces a dwelling mix that is far more balanced and less weighted towards larger dwellings. This dwelling mix is closer to what should be provided in Hungerford in order to permit older households in larger dwellings to downsize, and has the additional benefit of allowing newly forming households to access housing through smaller and more affordable dwellings.</p>

	<p>and those most likely to occupy smaller dwellings are not well represented. Although households aged 65 and over have begun to shift towards mid-sized dwellings, they still occupy dwellings of four or more bedrooms at twice the rate of households aged 25 to 34.</p> <p>Further analysis suggests that downsizing is more common at the national level than the particularly low figures seen in West Berkshire. and is in general constrained by the availability of smaller dwelling units to which moves can be made.</p>	<p>This housing mix should be applied flexibly, considering site specific characteristics, including context and local character, as well as the market dynamics at the time of the specific development.</p>
Tenure	<p>There are currently about 489 households in Hungerford who are unable to access tenures suitable to their needs. Over the Plan period, a further 95 households will fall into need, producing a total AH need of 584 dwellings that should be addressed over the Plan period.</p> <p>It should be noted that this number is largely dependent on information provided by West Berkshire District Council (WBDC) about their Common Housing Register. As that data cannot be broken down by priority banding, and includes those not living in Hungerford but wishing to do so, it is likely an inflated total. In turn the total AH need for Hungerford may be somewhat lower than the 584 dwellings identified here.</p> <p>65% of households in Hungerford own their own homes, 0.6% live in shared-ownership properties, 14% are in Social Rented accommodation, and 18.5% in private rented accommodation. Rates of ownership declined, and rates of renting increased over the intercensal period (particularly private renting, which increased by 90.5%)</p> <p>Average annual net household incomes before housing costs are relatively high at £35,900. The level of income required to afford each type of tenure is the following:</p> <ul style="list-style-type: none"> • Social Rent: £24,374; • Affordable Rent: £30,833; • Shared ownership (25%): £34,219; • Entry-level market rent: £38,016; • Starter Homes: £47,957; • Average market rent: £55,428; • Entry-level market sale: £59,946; • Average market sale: £81,432. 	<p>The appropriate policy response to this may be for Hungerford to seek for a higher proportion of newly built dwellings to be AH than would be provided for by the West Berkshire policy target.</p> <p>To eradicate the shortfall in its entirety would require an AH policy that requires all new residential dwellings to be AH. This is however clearly not possible, as AH is typically brought forward and made financially viable by its inclusion in small amounts within larger market developments. However, it will be worth Hungerford Town Council exploring other ways of bringing forward AH, for example through exception sites.</p> <p>Average net incomes are insufficient to occupy all but three housing tenures: Social Rent, Affordable Rent, and shared ownership at a 25% share.</p> <p>Entry-level market renting is only just out of reach for the average earning household, and so may be able to meet the needs of some households if the supply of dwellings for market rent increases in step with demand.</p> <p>Shared ownership at a 25% share is attainable to those on average incomes. In light of the reduction of households occupying this tenure over the intercensal period, it should be considered whether increasing the supply of shared ownership properties would help to reduce affordability pressures for many households.</p> <p>Delivering more affordable houses to be sold would also reduce pressure on the PRS in Hungerford, which is becoming a more popular option over time, but which at average rents is out of reach for many households.</p> <p>On the basis of the evidence we have gathered, the following split of AH tenures is put forward:</p>

		<ul style="list-style-type: none"> • Social Rent: 40%; • Affordable Rent: 30%; • Shared ownership: 20%; • Starter Homes: 10%.
Specialist housing	<p>Hungerford has 365 bed spaces in specialist housing for older people per 1,000 of the 75+ population.</p> <p>Of Hungerford's projected 2036 population, nearly 20% are estimated to be aged 75 and over, which equates to 1,238 people – and an increase of 687 since the last census.</p>	<p>The current provision of specialist accommodation is not sufficient to meet the needs of the projected elderly population, so Hungerford should plan to deliver an additional 110 bed spaces over the Plan period.</p> <p>These should be split into the following tenures to reflect national trends and imbalances in the current stock:</p> <ul style="list-style-type: none"> • 26 affordable retirement units; • 53 market retirement units; • 31 market units with care.

9.2 Recommendations for next steps

310. This Neighbourhood Plan housing needs advice has aimed to provide Hungerford Town Council with evidence on housing trends from a range of sources. We recommend that the parish should, as a next step, discuss the contents and conclusions with West Berkshire District Council with a view to agreeing and formulating draft housing policies, in particular the appropriate approach to identifying the level of need for new housing in the NP area, bearing the following in mind:
- Neighbourhood Planning Basic Condition A, that it has regard to national policies and advice contained in guidance issued by the Secretary of State; Condition D, that the making of the Neighbourhood Plan contributes to the achievement of sustainable development; and Condition E, which is the need for the Neighbourhood Plan to be in general conformity with the adopted strategic development plan;
 - the views of WBDC – in particular in relation to the housing need figure that should be adopted;
 - the views of local residents;
 - the views of other relevant local stakeholders, including housing developers;
 - the numerous supply-side considerations, including local environmental constraints, the location and characteristics of suitable land, and any capacity work carried out by the LPA, including but not limited to the SHLAA;
 - the recommendations and findings of this study; and
 - How recent changes to the planning system (for example the NPPF published in July 2018) will continue to affect housing policies at a local authority and, by extension, a neighbourhood level.
311. This advice note has been provided in good faith by AECOM consultants on the basis of housing data and national guidance current at the time of writing (alongside other relevant and available information).
312. Bearing this in mind, we recommend that the steering group should monitor carefully strategies and documents with an impact on housing policy produced by the LPA or any other relevant body and review the Neighbourhood Plan accordingly to ensure that general conformity is maintained.
313. At the same time, monitoring on-going demographic or other trends over the period in which the Neighbourhood Plan is being developed would help ensure the relevance and credibility of its policies.

Appendix A : Glossary

Adoption

The final confirmation of a local plan by a local planning authority.

Affordability³³

The terms 'affordability' and 'affordable housing' have different meanings. 'Affordability' is a measure of whether housing may be afforded by certain groups of households. 'Affordable housing' refers to particular products outside the main housing market.

Affordability Ratio

Assessing affordability involves comparing house costs against the ability to pay. The ratio between lower quartile house prices and the lower quartile income or earnings can be used to assess the relative affordability of housing. The Ministry for Housing, Community and Local Governments publishes quarterly the ratio of lower quartile house price to lower quartile earnings by local authority (LQAR) as well as median house price to median earnings by local authority (MAR) e.g. income = £25,000, house price = £200,000. House price: income ratio = £200,000/£25,000 = 8, (the house price is 8 times income).

Affordable Housing (NPPF Definition)/Intermediate Housing³⁴

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with Homes England. Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered as affordable housing for planning purposes.

Affordable rented housing

Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime^{**} but is subject to other rent controls that require a rent of no more than 80% of the local market rent (Including service charges, where applicable)^{***} ^{**} The national rent regime is the regime under which the social rents of tenants of social housing are set, with particular reference to the Guide to Social Rent Reforms (March 2001) and the Rent Influencing Regime Guidance (October 2001). ^{***} Local market rents are calculated using the Royal Institution for Chartered Surveyors (RICS) approved valuation methods. The Tenant Services Authority has issued an explanatory note on these at <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1918430.pdf>

Annual Monitoring Report

A report submitted to the Government by local planning authorities assessing progress with and the effectiveness of a Local Development Framework.

Basic Conditions

The basic conditions are the legal tests that are made at the examination stage of neighbourhood development plans. They need to be met before a plan can progress to referendum.

Backlog need

³³ <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1918430.pdf>

³⁴ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

The backlog need constitutes those households who are eligible for Affordable Housing, on account of homelessness, overcrowding, concealment or affordability, but who are yet to be offered a home suited to their needs.

Bedroom Standard³⁵

A measure of occupancy (whether a property is overcrowded or under-occupied, based on the number of bedrooms in a property and the type of household in residence. The Census overcrowding data is based on occupancy rating (overcrowding by number of rooms not including bathrooms and hallways). This tends to produce higher levels of overcrowding/ underoccupation. A detailed definition of the standard is given in the Glossary of the EHS Household Report

Co-living

Co-living denotes people who do not have family ties sharing either a self-contained dwelling (i.e, a 'house share') or new development akin to student housing in which people have a bedroom and bathroom to themselves, but share living and kitchen space with others. In co-living schemes each individual represents a separate 'household'.

Community Led Housing/Community Land Trusts

Housing development, provision and management that is led by the community is very often driven by a need to secure affordable housing for local people in the belief that housing that comes through the planning system may be neither the right tenure or price-point to be attractive or affordable to local people. The principle forms of community-led models include cooperatives, co-housing communities, self-help housing, community self-build housing, collective custom-build housing, and community land trusts. By bringing forward development which is owned by the community, the community is able to set rents and/or mortgage payments at a rate that it feels is appropriate. The Government has a range of support programmes for people interested in bringing forward community led housing.

Community Right to Build Order³⁶

An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development proposal or classes of development.

Concealed Families (Census Definition)³⁷

The 2011 Census defined a concealed family as one with young adults living with a partner and/or child/children in the same household as their parents, older couples living with an adult child and their family or unrelated families sharing a household. A single person cannot be a concealed family; therefore one elderly parent living with their adult child and family or an adult child returning to the parental home is not a concealed family; the latter are reported in an ONS analysis on increasing numbers of young adults living with parents.

Equity Loans/Shared Equity

An equity loan which acts as a second charge on a property. For example, a household buys a £200,000 property with a 10% equity loan (£20,000). They pay a small amount for the loan and when the property is sold e.g. for £250,000 the lender receives 10% of the sale cost (£25,000). Some equity loans were available for the purchase of existing stock. The current scheme is to assist people to buy new build.

Extra Care Housing³⁸

New forms of sheltered housing and retirement housing have been pioneered in recent years, to cater for older people who are becoming more frail and less able to do everything for themselves. Extra Care Housing is housing designed with the needs of frailer older people in mind and with varying levels of care and support available on site. People who live in Extra Care Housing have their own self-contained homes, their own front doors and a legal right to occupy the property. Extra Care Housing is also known as very or enhanced sheltered housing, assisted living, or simply as 'housing with care'. It comes in many built forms, including blocks of flats, bungalow estates and retirement villages. It is a popular choice among older people because it can sometimes provide an alternative to a care home. In addition to the communal facilities often found in sheltered housing (residents' lounge, guest suite, laundry), Extra Care often includes a restaurant or dining room, health & fitness facilities, hobby rooms and even computer rooms. Domestic support and personal care are available, usually provided by on-site staff. Properties can be rented, owned or part owned/part rented. There is a limited (though

³⁵ <https://www.gov.uk/government/publications/english-housing-survey-2011-to-2012-headline-report>

³⁶ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

³⁷ http://webarchive.nationalarchives.gov.uk/20160107160832/http://www.ons.gov.uk/ons/dcp171776_350282.pdf

³⁸ <http://www.housingcare.org/jargon-extra-care-housing.aspx>

increasing) amount of Extra Care Housing in most areas and most providers set eligibility criteria which prospective residents have to meet.

Fair Share

'Fair share' is an approach to determining housing need within a given geographical area based on a proportional split according to the size of the area, the number of homes in it, or its population.

Habitable Rooms

The number of habitable rooms in a home is the total number of rooms, less bathrooms, toilets and halls.

Household Reference Person (HRP)

The concept of a Household Reference Person (HRP) was introduced in the 2001 Census (in common with other government surveys in 2001/2) to replace the traditional concept of the head of the household. HRPs provide an individual person within a household to act as a reference point for producing further derived statistics and for characterising a whole household according to characteristics of the chosen reference person.

Housing Market Area (PPG Definition)³⁹

A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap.

The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries. Local planning authorities should work with all the other constituent authorities under the duty to cooperate.

Housing Needs

There is no official definition of housing need in either the National Planning Policy Framework or the National Planning Practice Guidance. Clearly, individuals have their own housing needs. The process of understanding housing needs at a population scale is undertaken via the preparation of a Strategic Housing Market Assessment (see below).

Housing Needs Assessment

A Housing Needs Assessment (HNA) is an assessment of housing needs at the Neighbourhood Area level.

Housing Products

Housing products simply refers to different types of housing as they are produced by developers of various kinds (including councils and housing associations). Housing products usually refers to specific tenures and types of new build housing, such as Starter Homes, the Government's flagship 'housing product'.

Housing Size (Census Definition)

Housing size can be referred to either in terms of the number of bedrooms in a home (a bedroom is defined as any room that was intended to be used as a bedroom when the property was built, any rooms permanently converted for use as bedrooms); or in terms of the number of rooms, excluding bathrooms, toilets halls or landings, or rooms that can only be used for storage. All other rooms, for example, kitchens, living rooms, bedrooms, utility rooms, studies and conservatories are counted. If two rooms have been converted into one they are counted as one room. Rooms shared between a number of households, for example a shared kitchen, are not counted.

Housing Type (Census Definition)

This refers to the type of accommodation used or available for use by an individual household, including detached, semi-detached, terraced including end of terraced, and flats. Flats are broken down into those in a purpose-built block of flats, in parts of a converted or shared house, or in a commercial building.

Housing Tenure (Census Definition)

³⁹ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

Tenure provides information about whether a household rents or owns the accommodation that it occupies and, if rented, combines this with information about the type of landlord who owns or manages the accommodation.

Income Threshold

Income thresholds are derived as a result of the annualisation of the monthly rental cost and then asserting this cost should not exceed 35% of annual household income.

Intercensal Period 2001-2011

The period between the last two censuses, i.e. between years 2001 and 2011.

Intermediate Housing

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as 'low cost market' housing, may not be considered as affordable housing for planning purposes.

Life Stage modelling

Life Stage modelling is forecasting need for dwellings of different sizes at the end of the Plan period on the basis of changes in the distribution of household types and key age brackets (life stages) within the NA. Given the shared behavioural patterns associated with these metrics, they provide a helpful way of understanding and predicting future community need. This data is not available at the parish level so District level data is employed on the basis of the NA falling within a defined Housing Market Area.

Life-time Homes

Dwellings constructed to make them more flexible, convenient adaptable and accessible than most 'normal' houses, usually according to the Lifetime Homes Standard, 16 design criteria that can be applied to new homes at minimal cost: <http://www.lifetimehomes.org.uk/>.

Life-time Neighbourhoods

Lifetime neighbourhoods extend the principles of Lifetime Homes into the wider neighbourhood to ensure the public realm is designed in such a way to be as inclusive as possible and designed to address the needs of older people, for example providing more greenery and more walkable, better connected places.

Local Development Order

An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

Local Enterprise Partnership

A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Local Planning Authority

The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority apply to the District council, London borough council, county council, Broads Authority, National Park Authority and the Greater London Authority, to the extent appropriate to their responsibilities.

Local Plan

The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.

Lower Quartile

The bottom 25% value, i.e. of all the properties sold, 25% were cheaper than this value and 75% were more expensive. The lower quartile price is used as an entry level price and is the recommended level used to evaluate affordability; for example for first time buyers.

Lower Quartile Affordability Ratio

The Lower Quartile Affordability Ratio reflects the relationship between Lower Quartile Household Incomes and Lower Quartile House Prices, and is a key indicator of affordability of market housing for people on relatively low incomes.

Market Housing (PPG Definition)

Market housing is housing which is built by developers (which may be private companies or housing associations, or Private Registered Providers), for the purposes of sale (or rent) on the open market. It is the opposite of affordable housing.

Mean (Average)

The sum of all values divided by the number of values. The more commonly used “average” measure as it includes all values, unlike the median

Median

The middle value, i.e. of all the properties sold, half were cheaper and half were more expensive. This is sometimes used instead of the mean average as it is not subject to skew by very large or very small statistical outliers.

Median Affordability Ratio

The Lower Quartile Affordability Ratio reflects the relationship between Median Household Incomes and Median House Prices, and is a key indicator of affordability of market housing for people on middle-range incomes.

Mortgage Ratio

The mortgage ratio is the ratio of mortgage value to income which is typically deemed acceptable by banks. Approximately 75% of all mortgage lending ratios fell below 4 in recent years⁴⁰, i.e. the total value of the mortgage was less than 4 times the annual income of the person who was granted the mortgage.

Neighbourhood Plan

A plan prepared by a Parish or Town Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Older People

People over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

Output Area/Lower Super Output Area/Middle Super Output Area

An output area is the lowest level of geography for publishing statistics, and is the core geography from which statistics for other geographies are built. Output areas were created for England and Wales from the 2001 Census data, by grouping a number of households and populations together so that each output area's population is roughly the same. 175,434 output areas were created from the 2001 Census data, each containing a minimum of 100 persons with an average of 300 persons. Lower Super Output Areas consist of higher geographies of between 1,000-1,500 persons (made up of a number of individual Output Areas) and Middle Super Output Areas are higher than this, containing between 5,000 and 7,200 people, and made up of individual Lower Layer Super Output Areas. Some statistics are only available down to Middle Layer Super Output Area level, meaning that they are not available for individual Output Areas or parishes.

Overcrowding

There is no one agreed definition of overcrowding, however, utilising the Government's bedroom standard, overcrowding is deemed to be in households where there is more than one person in the household per room (excluding kitchens,

⁴⁰ <https://www.which.co.uk/news/2017/08/how-your-income-affects-your-mortgage-chances/>

bathrooms, halls and storage areas). As such, a home with one bedroom and one living room and one kitchen would be deemed overcrowded if three adults were living there.

Planning Condition

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning Obligation

A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Purchase Threshold

Purchase thresholds are calculated by netting 10% off the entry house price to reflect purchase deposit. The resulting cost is divided by 4 to reflect the standard household income requirement to access mortgage products.

Proportionate and Robust Evidence (PPG Definition)

Proportionate and robust evidence is evidence which is deemed appropriate in scale, scope and depth for the purposes of neighbourhood planning, sufficient so as to meet the Basic Conditions, as well as robust enough to withstand legal challenge. It is referred to a number of times in the PPG and its definition and interpretation relies on the judgement of professionals such as Neighbourhood Plan Examiners.

Private Rented

The Census tenure private rented includes a range of different living situations in practice, such as private rented/ other including households living "rent free". Around 20% of the private rented sector are in this category, which will have included some benefit claimants whose housing benefit at the time was paid directly to their landlord. This could mean people whose rent is paid by their employer, including some people in the armed forces. Some housing association tenants may also have been counted as living in the private rented sector because of confusion about what a housing association is.

Rural Exception Sites

Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Shared Ownership

Housing where a purchaser part buys and part rents from a housing association or local authority. Typical purchase share is between 25% and 75%, and buyers are encouraged to buy the largest share they can afford. Generally applies to new build properties, but re-sales occasionally become available. There may be an opportunity to rent at intermediate rent level before purchasing a share in order to save/increase the deposit level

Sheltered Housing⁴¹

Sheltered housing (also known as retirement housing) means having your own flat or bungalow in a block, or on a small estate, where all the other residents are older people (usually over 55). With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors. There are many different types of scheme, both to rent and to buy. They usually contain between 15 and 40 properties, and range in size from studio flats (or 'bedsits') through to 2 and 3 bedroomed. Properties in most schemes are designed to make life a little easier for older people - with features like raised electric sockets, lowered worktops, walk-in showers, and so on. Some will usually be designed to accommodate wheelchair users. And they are usually linked to an emergency alarm service (sometimes called 'community alarm service') to call help if needed. Many schemes also have their own 'manager' or 'warden', either living on-site or nearby, whose job is to manage the scheme and help arrange any services residents need. Managed schemes will

⁴¹ <http://www.housingcare.org/jargon-sheltered-housing.aspx>

also usually have some shared or communal facilities such as a lounge for residents to meet, a laundry, a guest flat and a garden.

Strategic Housing Land Availability Assessment (NPPF Definition)

A Strategic Housing Land Availability Assessment (SHLAA) is a document prepared by one or more local planning authorities to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. SHLAAs are sometimes also called LAA (Land Availability Assessments) or HELAAS (Housing and Economic Land Availability Assessments) so as to integrate the need to balance assessed housing and economic needs as described below.

Strategic Housing Market Assessment (NPPF Definition)

A Strategic Housing Market Assessment (SHMA) is a document prepared by one or more local planning authorities to assess their housing needs, usually across administrative boundaries to encompass the whole housing market area. The NPPF makes clear that SHMAs should identify the scale and mix of housing and the range of tenures the local population is likely to need over the plan period. Sometimes SHMAs are combined with Economic Development Needs Assessments to create documents known as HEDNAs (Housing and Economic Development Needs Assessments).

Specialist Housing for the Elderly

Specialist housing for the elderly, sometimes known as specialist accommodation for the elderly, encompasses a wide range of housing types specifically aimed at older people, which may often be restricted to those in certain older age groups (usually 55+ or 65+). This could include residential institutions, sometimes known as care homes, sheltered housing, extra care housing, retirement housing and a range of other potential types of housing which has been designed and built to serve the needs of older people, including often providing care or other additional services. This housing can be provided in a range of tenures (often on a rented or leasehold basis).

Social Rented Housing

Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008.) for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with Homes England.⁴²

⁴² <http://www.communities.gov.uk/documents/planningandbuilding/doc/1980960.doc#Housing>

Appendix B : Group comments

AECOM Comment Actions

Date: 27.02.2019

Comment No. or Summary	AECOM Action or Non-Action	Explanation
The Plan period is confirmed as 2018-2036 rather than 2013-2036.	This update has been reflected throughout the document and does not change the Housing Needs Figure.	This was an open question, raised with the group after a query from West Berkshire District Council, and an important point to confirm and put right.
This is not a Housing Needs Survey as there is no evidence to support need in the document.	No action taken, household survey recommended to the group.	The group felt that the HNA relies overly on secondary data sources and is primarily a statistical exercise, rather than a highly localised study using bottom-up primary data such as surveys. The Locality Toolkit on Housing Needs Assessments has since been shared with the group to provide context around the types of data sources HNAs are required and recommended to use. In light of this, the group are satisfied that the HNA meets those guidelines, and have accepted the suggestion that a household survey would be a useful addition to the evidence base supplied in the HNA.
There should be a bottom up approach.	No action taken, household survey recommended.	(See above.)
Every number is derived from the 2000 figure which is not relevant to our plan period. Previously the reverence to that figure was up to 2000. Further comments were added during a call with the group on 26.02.2019, expressing the wish for further caveating of the Housing Need Figure with reference to the specific constraints of development in AONBs.	Moderate revisions to wording around the Housing Needs Figure calculation.	The West Berkshire Core Strategy (2006-2026) is the latest and most up-to-date expression of the Local Authority spatial strategy. It has been used simply to derive Hungerford's share of the District housing target in line with that strategy (as PPG dictates): the final figure is still a percentage of the District's overall Local Housing Need. This produces an annual figure that is then extrapolated out over the Plan period of the Neighbourhood Plan. From the 2006-2026 period of the Core Strategy we generate an annual number and then apply it to the Neighbourhood Plan period of 2018-2036, so the fact that those two periods are not aligned is not material. More explanation has been added in the Quantity section to emphasise: the policies in the Core Strategy that seek to protect the AONB from over-development; and the fact that the 2000 target is an upper bound target not a minimum.
During the call on 26.02.2019, the group emphasised the policy context affecting settlements within the AONB which had been highlighted in the Policy Context section of this report but not referred to specifically within the Quantity section.	This change has been made: a further caveat referencing relevant policy has been added to the Quantity section and summarised in the Executive Summary.	As the HNF refers to the spatial strategy of the District it is logical and fair that the number be caveated with reference to this policy context – which permits a greater degree of flexibility dependent on supply.
Methodology on how to allocate the mix is fine.	No action required.	This comment does not require any action.
The conclusion that Hungerford needs more 3 and	An additional section has been added to the HNA to	Although the methodology is accepted as sound, the group's concerns about the recommended dwelling mix it

4 bedroom houses is at odds with comments regarding affordable housing.	model an alternative dwelling mix scenario, with an outcome that is more in line with the group's expectations.	arrived at are valid and run counter to common sense. This has been taken as an opportunity to experiment with an alternative methodology that has not replaced the existing one in this HNA but been appended to it with explanatory text and research to back up its assumptions. It adjusts the occupation pattern of the District (the data at the source of the issue identified) to account for fewer limitations on the ability of older households to downsize into smaller properties.
No analysis on likelihood of people downsizing in the future with decreasing pension incomes.	An additional review of research in this area has been added, and employed in the additional modelling exercise described above.	This is a topic of particular interest to the group and worth exploring more generally. The previous conclusion was caveated with references to this issue, but a caveat is only ever a descriptive addition – it does not change the final numbers that the group must refer to as their evidence base when crafting policy. An attempt has therefore been made to incorporate this research into the numbers themselves – though again with caveats. It will be a matter for the group's discretion and the view of the examiner of their Neighbourhood Plan, should it include bold policy choices that depend on this data, whether or not it should be relied on outside of the context of the HNA.
The info on trains to Swindon is incorrect.	The reference to train services to Swindon has been removed.	This is a valid and useful correction.
<p>If the 500 houses were all affordable there still wouldn't be enough.</p> <p>In the call on 26.02.2019 the limitations of the Local Authority data (see explanation column) was explained to the group. They wished to seek further clarification on exactly who is included in this 451 number and that the report be updated to clarify this.</p>	<p>No action taken on the overall figure.</p> <p>Local Authority contacted about the definition of their Common Housing Register data, and this has been added to the Tenure section.</p>	<p>This is a very legitimate point, and there are two parts to the explanation.</p> <p>First, it is not unusual in unaffordable rural areas that the Affordable Housing target in a HNA exceeds the overall Housing Need Figure. As can be seen in Figure 7-3, the majority of tenures are not within reach for those on average incomes, and the Local Authority have provided a number of Hungerford residents on the Affordable Housing Register of 451 – which is 17% of all households. With that degree of affordability pressure, it is not unexpected to reach a conclusion that essentially all future housing supply needs to be Affordable Housing. Unfortunately, current methodology doesn't allow the overall Housing Need Figure and the need for Affordable Housing to be brought into alignment where the latter cannot exceed the first – they are separate calculations. What this conclusion means in policy terms is that the evidence base presented here gives Hungerford's Neighbourhood Plan a strong position from which to argue that Affordable Housing policies that are bolder than those at District-level would be justified, should they wish to do so. It could also justify an entry-level exception site outside the settlement boundary or setting up a community land trust.</p> <p>The second aspect, and a caveat to the above, is that the total of 451 people on the Common Housing Register for Hungerford – on which the Affordable Housing calculation largely depends – cannot be broken down by priority banding. The figure we typically use in this exercise is the priority list of Affordable Housing Need in the NA. The Supervisor of West Berkshire's Housing Register</p>

		<p>informed us that they do not keep a priority list – only a “single list of people that can bid on social properties”. Therefore it is likely that, were West Berkshire able to supply a figure of only their highest priority bands, the resulting figure in the HNA would be slightly lower. When contacted to clarify whether this 451 figure refers to people living within Hungerford or with a strong connection to the town, or to all people in the area who have selected Hungerford as their preferred location, the Local Authority clarified that it is indeed the latter. However, they do not keep reliable data on where applicants currently live and so this figure is the best and only option for inclusion in the HNA, despite its flaws.</p>
<p>The group have identified a number of planning applications at advanced stages that they would like made reference to in the Quantity section.</p>	<p>These points have been included.</p>	<p>It is useful to review the future delivery pipeline, although it cannot be used to amend the Housing Needs Figure.</p>
<p>On the call on 26.02.2019 the group requested a proposed tenure split for future Affordable Housing provision,</p>	<p>This has been added.</p>	<p>It was explained to the group that this is a relatively subjective exercise. Perfectly legitimate to include, but also requiring that caveat.</p>
<p>In the call on 26.02.2019 it was requested that if household projections detail the population of 11-16 years olds in 2036 this figure be included in the report.</p>	<p>Checks undertaken but no changes made to the HNA.</p>	<p>Household projections have been checked and unfortunately do not break down population into this age bracket – they specify only ‘under 25’.</p>

