

Strategic Environmental Assessment (SEA) for the Hungerford Neighbourhood Plan

Environmental Report

Hungerford Town Council

February 2024

Quality information

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Non-Technical Summary

Introduction

AECOM is commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Hungerford Neighbourhood Plan (HNP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the HNP is a legal requirement. This is a Non-Technical Summary (NTS) of the SEA Environmental Report.

The Hungerford Neighbourhood Plan has been prepared by the Town Council in the context of the adopted West Berkshire Local Plan, and the emerging Local Plan Review (submitted for Independent Examination in 2023).

Once 'made' the Neighbourhood Plan will have material weight when deciding on planning applications, alongside the West Berkshire Local Development Framework.

This Environmental Report is published alongside the 'pre-submission draft' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).

Structure of the Environmental Report

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved **up to this point?**
 - including in relation to 'reasonable alternatives'.
2. What are the SEA findings **at this stage?**
 - i.e., in relation to the pre-submission plan.
3. What happens next?

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

What is the Plan seeking to achieve?

The vision for Hungerford over the plan period to 2041 is as follows:

“Hungerford sits at the heart of the North Wessex Downs AONB and is treasured for being an historic market town set within beautiful and accessible countryside and waterways.

The residents of Hungerford seek to work together to embrace constructive change that ensures a vibrant, robust and sustainable economy that will enhance their prosperity and provide an affordable and nurturing environment for current and future generations.

This should be achieved whilst conserving Hungerford’s natural and manmade heritage and enhancing its strong sense of being a caring community and a fulfilling place to live.”

This vision is supported by a number of objectives, set out in Chapter 2 of the main Environmental Report.

What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented below, and a full framework which includes assessment questions is provided within **Appendix B** to the main report.

Table NTS.1 Summary SEA Framework

SEA theme	SEA objective(s)
Biodiversity	<ul style="list-style-type: none"> Protect and enhance all biodiversity.
Climate change	<ul style="list-style-type: none"> Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change.
Community wellbeing	<ul style="list-style-type: none"> Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Historic environment	<ul style="list-style-type: none"> Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.
Land, soil and water resources	<ul style="list-style-type: none"> Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.
Landscape	<ul style="list-style-type: none"> Protect and enhance the character and quality of the immediate and surrounding landscape.
Transportation	<ul style="list-style-type: none"> Promote sustainable transport use and active travel opportunities and reduce the need to travel.

Plan-making/ SEA up to this point

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or alternative sites.

Specifically, Part 1 of the report:

- Explains the process of establishing the reasonable alternatives.
- Presents the outcomes of assessing the reasonable alternatives; and
- Explains reasons for establishing the preferred option, considering the assessment (and other factors).

The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing given the following considerations:

- The draft HNP objectives, particularly the objective to ensure that housing development provides a range of house types, sizes and tenures that meets the needs of all age groups and incomes.
- Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Establishing the reasonable alternatives

The Environmental Report explains how reasonable alternatives were established after the process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors).

This work identified three site options with the potential to deliver growth within Hungerford. These site options can be delivered in a number of different 'packages' and these form the reasonable alternatives for appraisal.

- Option 1 – Land at Smitham Bridge Road and land north of Cottrell Close (56 homes)
- Option 2 – Land at Salisbury Road (65 homes)
- Option 3 – Land at Salisbury Road + land north of Cottrell Close (77 homes)
- Option 4 – Land at Smitham Bridge Road + land at Salisbury Road (109 homes)
- Option 5 – Land at Smitham Bridge Road + land at Salisbury Road + land north of Cottrell Close (121 homes)

These spatial options are further detailed in **Chapter 5** of the main Report (**Figures 5.2 – 5.6** and **Table 5.2**).

Assessing the reasonable alternatives

The table below and supplementary narrative presents summary findings for the assessment of the five spatial options, with detailed findings presented in **Chapter 6** of the Environmental Report.

Table NTS.2: Summary of assessment of reasonable alternative options

SEA theme		Option 1	Option 2	Option 3	Option 4	Option 5
Biodiversity and geodiversity	Rank	3	1	4	2	5
	Significant effect?	No	No	No	No	No
Climate change and flood risk	Rank	2	1	3	4	5
	Significant effect?	No	No	No	No	No
Community wellbeing	Rank	5	1	2	3	4
	Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
Historic environment	Rank	1	2	4	3	5
	Significant effect?	No	No	No	No	No
Land, soil, and water resources	Rank	1	2	3	4	5
	Significant effect?	No	No	No	No	No
Landscape	Rank	1	2	4	3	5
	Significant effect?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
Transportation	Rank	1	2	4	3	5
	Significant effect?	No	No	No	No	No

With regard to biodiversity and geodiversity, climate change and flood risk, and community wellbeing, Option 2 is the most favourable option. This is given that Option 2 only includes one site (HUN14), that is not particularly constrained by biodiversity sites or flood risk, and will exceed local housing needs on one site on the edge of the town, with the potential to deliver a mix of homes that are well located to access local services and facilities/ amenities (without significant exacerbating existing capacity issues). Option 1 is ranked the lowest for community wellbeing, which is due to being the only option to not include site HUN14. However, it is important to note that all five options present potential for significant positive effects if taken forward.

Option 1 is the most favourable of all of the options under the SEA themes of historic environment, land, soil, and water resources, landscape, and transportation. This is due to the fact that the sites included under Option 1 are the least constrained, as well as have the lowest level of growth/ level of greenfield loss. In comparison, Option 5 is considered to be the least favourable across all four of these themes, given the high level of growth and in-combination effects of delivering all three greenfield sites around the town and within the NL.

Taking a precautionary approach, all options are concluded as having the potential to lead to significant negative effects at this stage in relation to the landscape SEA theme. This reflects the loss of greenfield land in the NL.

Developing the preferred approach

Consultation was carried out with the local community in November 2023 with the aim of identifying a preferred option for allocation through the Neighbourhood Plan. The five options were set out and respondents were asked to identify their preferred option and provide the main reasons for their preference. The town council took the responses produced from the two survey methods and collated all the information received. The report detailing the housing site consultation can be found [here](#).

The summary of responses (see Table 7.1), alongside the SEA findings presented above (and in Chapter 6), suggests that Options 3, 4 and 5 are least preferable and therefore not progressed for allocation through the Neighbourhood Plan.

Option 1 received the greatest support through the survey responses, with 46% preferring this approach. Option 2 is a clear second at 30% and in practice Option 3 is similar to Option 2 as it includes the large site at Salisbury Road, with the addition of the site to the rear of Cottrell Close. However support for both Option 2 and 3 (40%) is still less than Option 1 at 46%.

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

Assessment findings at this stage

The assessment of the draft HNP viewed ‘as a whole’ can be found within Chapter 9, with a summary of conclusions and recommendations set out overleaf:

Conclusions

Overall, **significant positive effects** are predicted in relation to community wellbeing, reflective of the allocation of relatively sustainably located sites that should ensure that the identified local housing need is met in full. The policy framework seeks to deliver an appropriate housing mix, including affordable housing, and supports improvements to the public realm, community facilities, and employment opportunities.

Minor positive effects are considered most likely in relation to both biodiversity, and climate change. This reflects the avoidance of impacts expected by the spatial strategy (site allocations), and additional policy measures which seek to improve biodiversity and increase climate resilience (once recommendations have been adopted).

Minor negative effects have been concluded for landscape given the development of 56 homes on greenfield land in the NL. While it is recognised that the NL Management Plan sets out support for appropriately located development on the edge of key settlements in the NL, and policy provisions set out design requirements, etc.; given evidence identifies the sites as being of medium sensitivity, negative effects are unlikely to be wholly avoided.

Minor negative effects have also been concluded in relation to the land, soil and water SEA theme, reflective of the loss of approximately 4ha of greenfield, high quality agricultural land. This loss is permanent and negative but largely unavoidable in the absence of brownfield alternatives.

Neutral effects are identified for the transportation SEA theme as development will likely integrate well with the town and will be sustainably located supported by policy provisions to ensure growth does not exacerbate existing local issues.

Neutral effects are also identified in relation to the historic environment. The draft NP policy framework performs well through seeking to protect and enhance the local historic environment and setting out support for retrofitting and positive design. However, recommendations set out could strengthen the potential for residual positive effects overall.

Recommendations

The following recommendations are made for consideration:

While the Local Plan (alongside higher level policy provisions) provides a level of protection to assets, it is considered that the draft HNP could be strengthened by including a heritage policy. This policy could set localised requirements for the protection and enhancement of the historic environment, including designated and non-designated assets, and establish development guidelines for the area. The PPG and Historic England provide guidance in this respect, and it is considered that there is opportunity for a local heritage policy to be “distinct to reflect and respond to the unique characteristics and planning context of the neighbourhood area”. This would supplement Local Plan policy while addressing the absence of a Conservation Area

Appraisal (CAA). As identified through scoping this is a clear evidence gap for the neighbourhood area.

Supporting draft HNP policy text includes Action F 'Traffic Impacts in Hungerford', which sets out support for the introduction of Electric Vehicle charging infrastructure. It is recommended that this be translated into Neighbourhood Plan policy, providing more weight to the ambition as development will be required to comply with policy. This could be included within Policy HUNG10, for example, and help contribute towards transport and climate objectives.

The overarching Neighbourhood Plan policy in relation to biodiversity is Policy HUNG11 (Wildlife Friendly Design), which provides protection for biodiversity, habitats and species, and ensures that biodiversity net gains are achieved in development. Biodiversity 'net gain' has been introduced through the Environment Act, and mandates that all qualifying schemes secure a net gain of 10%. Now the mandatory requirement for BNG is in place, there is no technical need to repeat the legal requirements in local policy. The Neighbourhood Plan therefore presents an opportunity to set policy requiring a higher percentage net gain, where there is evidence to support such an approach. Requiring 'at least 10% measurable BNG', or an exceedingly ambitious '20% BNG', can be calculated using Natural England's biodiversity metric, to ensure the delivery of maximum biodiversity on site.

Policy HUNG11 performs sets out support for the use of green roofs, swift bricks and hedgehog-friendly fencing; recognising the importance of design features that can encourage local wildlife and biodiversity to thrive. Positive effects are also likely to be delivered in this respect through Policy HUNG9 (Wellbeing and Safety Through Design), which encourages development to deliver green infrastructure and design green spaces that create and enhance habitats for wildlife. This policy could however be strengthened through setting support for connectivity of green infrastructure and green spaces, recognising the benefits of creating biodiversity links to support habitat improvement; alongside improving the public realm.

It is recommended that the site allocation policies be revised to reference the need for consideration to be given to the North Wessex NL and its Management Plan; recognising that the Management Plan includes specific development guidelines for sustainable growth in the NL.

Next steps

This Environmental Report accompanies the Hungerford Neighbourhood Plan for Regulation 14 consultation.

Following consultation, any representations made will be considered by the Town Council and the Neighbourhood Plan and Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, West Berkshire Council (WBC), for subsequent Independent Examination.

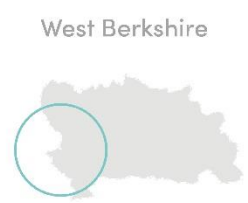
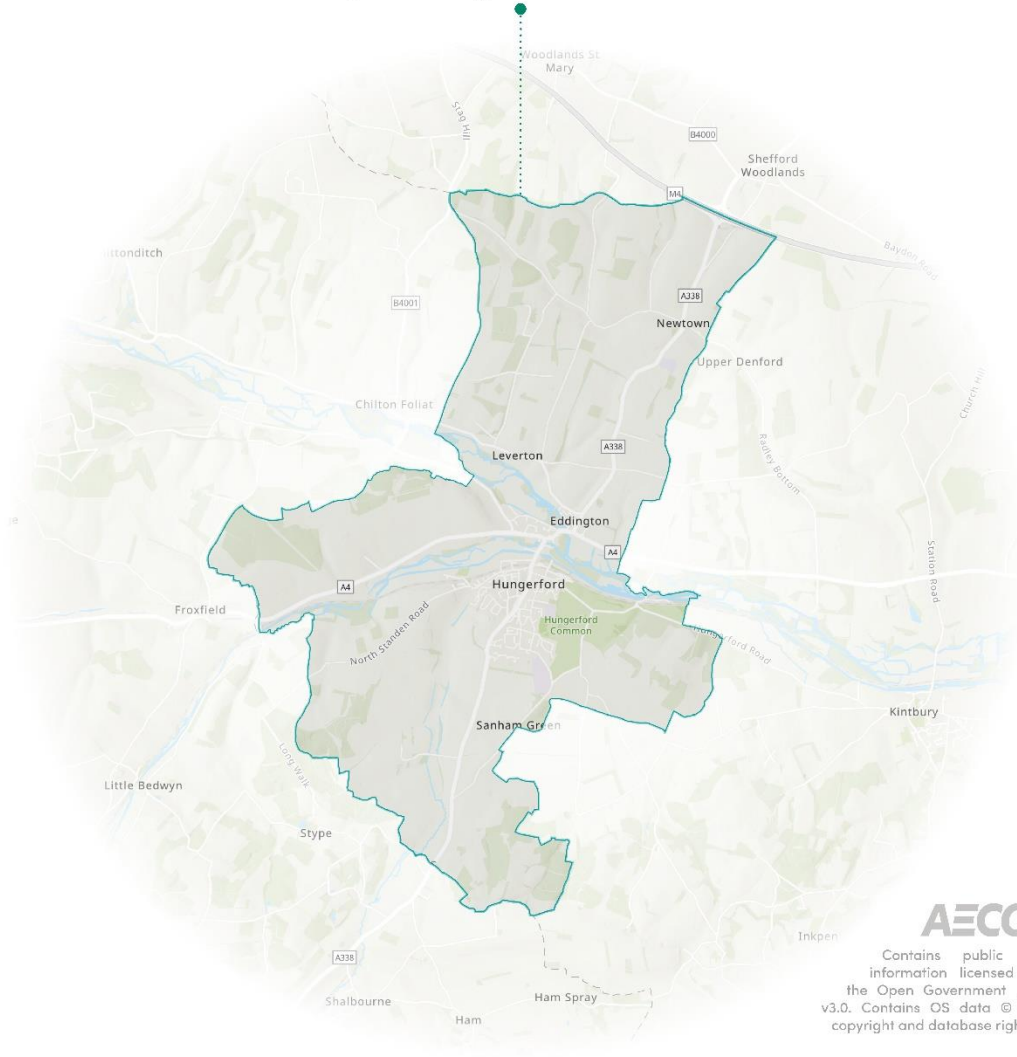
At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by WBC. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Hungerford Neighbourhood Plan will become part of the Development Plan for the Hungerford.

There is a need to prepare an SEA Statement following 'adoption' of the HNP, and this is where measures for monitoring significant effects will be established.

Introduction

Hungerford Neighbourhood Plan Area



1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Hungerford Neighbourhood Plan (HNP).
- 1.2 The HNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the local planning framework of West Berkshire Council.
- 1.3 The neighbourhood area (see above), designated in April 2018, covers the parish of Hungerford in West Berkshire. Hungerford is located in the southwest corner of West Berkshire and is located directly west of Newbury and southeast of Swindon. The neighbourhood plan area is a predominantly rural landscape with the majority of the population living within the town of Hungerford, with the village of Eddington to the north.

SEA Screening

- 1.4 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating potential negative effects and maximising potential positive effects.¹
- 1.5 The HNP has been screened for SEA by West Berkshire Council (October 2022), stating:

“SEA is required if the proposals in an emerging Plan are likely to result in significant effects on the environment. Given Hungerford’s location within the North Wessex Downs AONB and the presence of historic and nature conservations designations (e.g. Conservation Area, Listed Buildings, Local Wildlife Sites, Special Areas of Conservation, and Sites of Special Scientific Interest) and because the NDP will include residential allocation(s), there is the potential for the NDP to have significant effects. Our initial view is that SEA will be required.”
- 1.6 In light of the above, SEA is required to assess the potential for significant environmental effects.

¹ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an Environmental Report, or B) a statement of reasons why SEA is not required, prepared following a ‘screening’ process.

SEA explained

- 1.7 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004. The Regulations stipulate that a report (known as the Environmental Report) must be published for consultation alongside the draft plan that “*identifies, describes, and evaluates*” the likely significant effects of implementing “*the plan, and reasonable alternatives*”.² The report must then be considered when finalising the plan.
- 1.8 More specifically, the report can be structured to address requirements by answering the following three questions:
4. What has plan-making / SEA involved up to this point?
 - including in relation to ‘reasonable alternatives’.
 5. What are the SEA findings at this stage?
 - i.e., in relation to the current draft plan.
 6. What happens next?

This Environmental Report

- 1.9 This report is the Environmental Report for the Hungerford Neighbourhood Plan. It is published alongside the ‘pre-submission draft’ version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended). The report answers the three questions outlined above in turn, as discrete ‘parts’ of the report. However, before answering these questions, two further introductory sections are presented to further set the scene (**Chapters 2 and 3**).

² Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

2. What is the plan seeking to achieve?

Local Plan context for the Hungerford Neighbourhood Plan

- 2.1 The strategic policy context is set by the adopted [West Berkshire Local Plan 2006-2026](#), adopted in 2012. This consists of a number of development plan documents (DPD), including the [Core Strategy DPD](#) and the [Housing Site Allocations DPD](#). It also includes the saved policies³ of West Berkshire District Local Plan 1991-2006. The Core Strategy DPD defines Hungerford as a ‘Rural Service Centre’ and West Berkshire Council have set a housing requirement of 55 dwellings. There is a potential for up to 150 homes to be built, with the aim being to either deliver or exceed the 55 necessary, as allocated by West Berkshire Council.
- 2.2 West Berkshire are in the process of producing a new Local Plan, known as the [West Berkshire Local Plan Review](#). The Local Plan Review will replace the current adopted Local Plan and will cover the period 2022 – 2039. Although the programme is delayed and it is expected to cover the period 2024-2041. The Local Plan Review was submitted in March 2023 to the Secretary of State for Independent Examination.

Hungerford Neighbourhood Plan vision and objectives

- 2.3 The vision for Hungerford over the plan period to 2041 is as follows:

“Hungerford sits at the heart of the North Wessex Downs National Landscape and is treasured for being an historic market town set within beautiful and accessible countryside and waterways.

The residents of Hungerford seek to work together to embrace constructive change that ensures a vibrant, robust and sustainable economy that will enhance their prosperity and provide an affordable and nurturing environment for current and future generations.

This should be achieved whilst conserving Hungerford’s natural and manmade heritage and enhancing its strong sense of being a caring community and a fulfilling place to live.”

³ Saved policies by directive of the Secretary of State on 25 September 2007.

2.4 The vision is underpinned by a number of Neighbourhood Plan objectives, identified through engagement with the local community. These are as follows:

- **Housing:** Ensure that new housing in Hungerford meets the needs of current and future generations of residents in a way that complements the character of the town and the countryside surrounding it.
 - Allocate sites to meet the housing requirements in the West Berkshire Local Plan to 2041, where possible making best use of previously developed land and minimising encroachment into the countryside
 - Ensure that housing development provides a range of house types, sizes and tenures that meets the needs of all age groups and incomes.
 - Seek to ensure that new housing reflects the character of its neighbourhood whilst embracing high quality design principles and modern energy efficiency standards.
- **Employment and Economy:** Support growth in the variety of shops, restaurants and businesses in the town and the employment opportunities which they create. Promote Hungerford as an attractive place to live and work (particularly for young people), with good facilities, services and transport links.
 - Encourage businesses and support initiatives, including those which promote a vibrant high street and increase the range of shops, services and eating places in the town for the benefit of residents, tourists and visitors of all ages. Recognise that Hungerford acts as a service centre providing facilities to neighbouring villages.
 - Promote an increase in the number and quality of employment opportunities within the town.
- **Getting About:** Seek improvements to Hungerford's transport infrastructure so that safe, effective, sustainable and efficient travel is available and accessible to all.
 - Minimise the effects of traffic in the town centre and especially the High Street for the benefit of pedestrians and all road users.
 - Increase walking and cycling in the town.
 - Encourage public transport usage to and from the town.

- **Leisure, Wellbeing, Public Safety and Learning:** Hungerford should offer young people and children a safe, healthy and nurturing environment in which to develop and mature. This will include a full range of educational services and plenty of leisure and sports activities. Develop Hungerford's thriving sports, arts and social community and protect its green, open spaces. Ensure that Hungerford remains a safe, healthy and caring place to live.
 - Protect and maintain existing public playgrounds and open spaces to a high standard and look at ways of increasing the range of facilities provided as the town grows.
 - Support the development of sports, arts, youth clubs, social and leisure facilities, including the widest possible range of activities for young people.
 - Support and develop services which assist and encourage people to maintain their own health.
 - Minimise crime and anti-social behaviour in and around the town.
 - Support and enhance the schools in Hungerford.
- **Our Heritage:** Conserve and, where practicable, enhance Hungerford's natural and built environment.
 - Protect and enhance the appearance and historic environment of the town and parish.
 - Improve the approaches to the town by road, rail and canal to create favourable first impressions and a soft boundary between the countryside and the town.
 - Protect the landscape around Hungerford and support the charities and agencies which are responsible for its conservation.
 - Enhance the environment of Hungerford High Street and Bridge Street between the Bridge Street/A4 roundabout and the Atherton Road/High Street roundabout.
- **Climate Change and Biodiversity:** Hungerford will encourage low carbon development to promote lower energy costs, cleaner air and healthier lifestyles, contributing to the well-being of current and future generations. It will also ensure that development enhances the biodiversity of the parish.
 - Reduce carbon emissions with more energy efficient buildings.
 - Encourage new development to maximise the protection and enhancement of biodiversity.
 - Support proposals for individual and community scale renewable energy generation provided the benefits outweigh any adverse impacts.
 - Increase resilience to climate change.

3. What is the scope of the SEA?

Summary of SEA Scoping

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”.
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England⁴. These authorities were consulted on the scope of the SEA in November 2023.
- 3.3 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
 - A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the Hungerford Neighbourhood Plan.
 - Baseline data against which the Hungerford Neighbourhood Plan can be assessed.
 - The key sustainability issues for the Hungerford Neighbourhood Plan; and
 - An ‘SEA Framework’ of objectives against which the Hungerford Neighbourhood Plan can be assessed.
- 3.4 Further information on the scope of the HNP, alongside the full SEA framework as consulted on, is presented in **Appendix B**.
- 3.5 The comments provided by the consultees on the Hungerford Neighbourhood Plan SEA Scoping Report, and how they have been addressed, can be read in **Table 3.1** overleaf. The full SEA Scoping Report is available [here](#).

⁴ These consultation bodies were selected “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effect of implementing plans and programmes” (SEA Directive, Article 6(3)).

Table 3.1 Scoping consultation responses

Consultation response	How the response was considered and addressed
<p>Historic England <i>Historic Places Advisor (email response received on 9th January 2024)</i></p>	
<p>In terms of the historic environment, we consider that the report has identified the plans and programmes which are of most relevance to the development of the plan, that it has established an appropriate baseline against which to assess the plan’s proposals and that it has put forward a suitable set of objectives and indicators. Overall, we believe that it provides an appropriate framework for assessing significant effects which this plan might have upon the historic environment.</p>	<p>Thank you for your response.</p>
<p>Historic England strongly advises that conservation and archaeological advisers are closely involved throughout the preparation of the SEA of this plan. Historic England has produced guidance for all involved in undertaking SEA exercises which gives advice on issues relating to the historic environment. This can be found here: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</p>	<p>Comment noted. Thank you for providing the linked resource.</p>
<p>Environment Agency</p>	
<p><i>No response received</i></p>	<p>N/A</p>
<p>Natural England</p>	
<p><i>No response received</i></p>	<p>N/A</p>

Part 1: What has plan-making/ SEA involved to this point?

4. Introduction (to Part 1)

Overview

- 4.1 The aim of this part of the report is to explain work undertaken to develop and assess reasonable alternatives. Whilst work on the HNP has been underway for some time, the aim here is not to provide a comprehensive explanation of work undertaken to date, but rather to discuss the evolution of the HNP in association with the SEA process. More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to a particular issue that is of central importance to the plan, namely the broad location of development in the neighbourhood area.
- 4.2 Structure of this part of the report:
- **Chapter 5** – explains the process of establishing reasonable alternatives
 - **Chapter 6** – presents the outcomes of assessing reasonable alternatives
 - **Chapter 7** – explains reasons for establishing the preferred option, in light of the assessment.

5. Establishing alternatives

Introduction

- 5.1 The aim here is to explain a process that led to the establishment of reasonable alternatives, and thereby present “an outline of the reasons for selecting the alternatives dealt with”.

Strategic parameters

- 5.2 As discussed in Chapter 2, the draft HNP has been prepared in the context of the West Berkshire Local Plan (2012), and the forthcoming Local Plan Review. Policy SP15 of the Submission Version of the Local Plan Review identifies the housing requirement for Hungerford as 55 dwellings over the plan period, and that this need will be delivered by the Parish Council allocating sites through the emerging Neighbourhood Plan.
- 5.3 In March 2023 the Plan was submitted to the Secretary of State for independent examination. That examination is ongoing, with public hearings expected to be held later in 2024. The minimum figure of 55 dwellings is therefore considered, for the purpose of neighbourhood plan-making, to be a robust figure on which to base allocations in the HNP.
- 5.4 The first step in establishing reasonable alternatives that can achieve this dwelling need was to identify site options.

Site options

- 5.5 The site selection process was led by the Town Council, with support from independent consultants. A three stage approach was taken to arrive at reasonable alternative options to meet the 55 minimum dwelling figure. This is summarised below, with full Report available [here](#).

Stage 1: Housing and Economic Land Availability Assessment (HELAA)

- 5.6 25 sites were assessed through West Berkshire Council's (WBC) HELAA between 2016 and 2023. These sites were identified through WBC's Call for Sites (CfS) process, and two local CfS's published by HTC (in 2018 and 2022).
- 5.7 The HELAA assessment of sites resulted in the following categorisation of each site:
- Potentially developable (or potentially developable in part);
 - Not developable within the next 15 years; or
 - Not available.
- 5.8 The categorisation of some sites changed throughout the process, specifically due to the fact that their availability had changed. Also, some sites were removed from the process due to the fact that they had received planning permission. Of the 19 sites remaining in the Stage 1 process, **Figure 5.1** overleaf shows that eight were considered potentially developable (or

potentially developable in part). All other sites were considered not developable within the next 15 years.

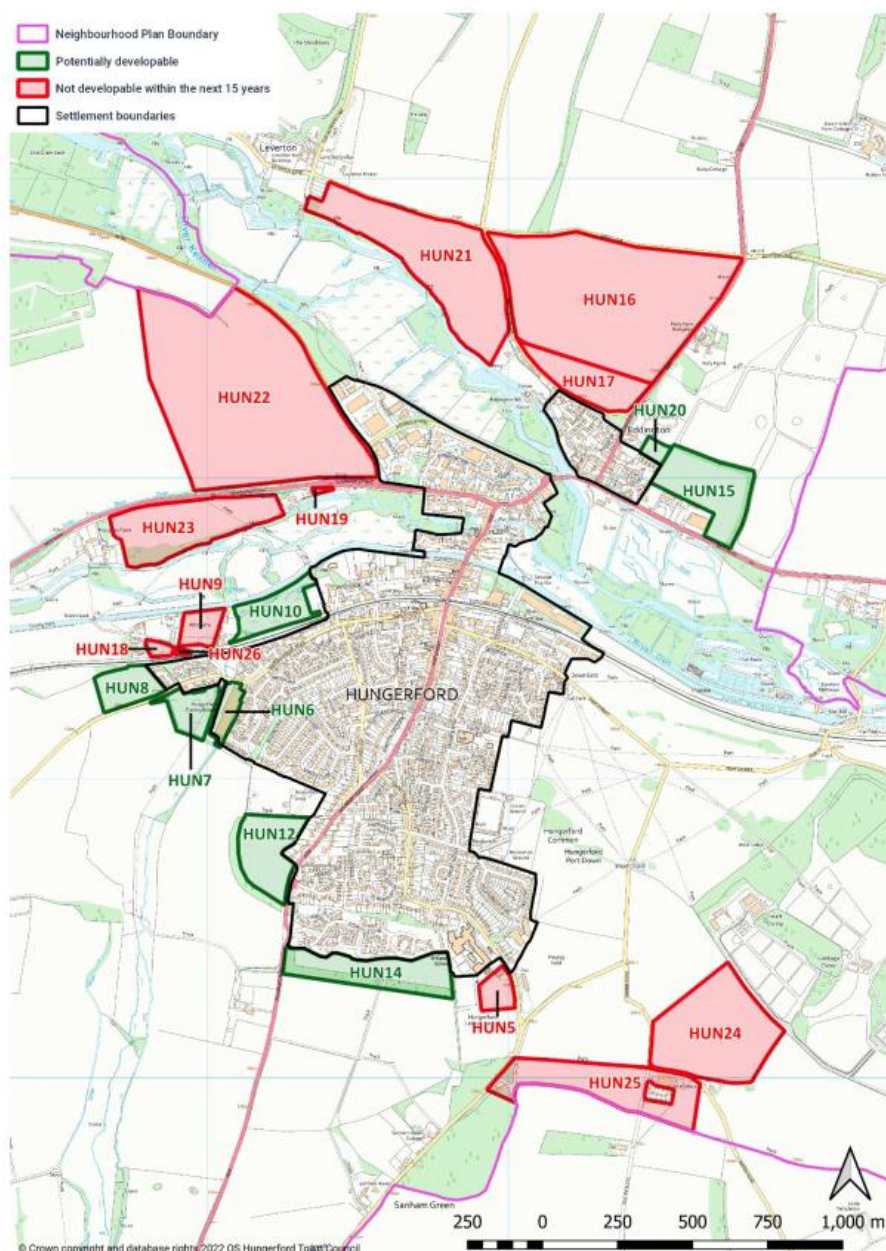


Figure 5.1 Stage 1 site assessment

5.9 The eight sites that were considered by the HELAA assessment to potentially be developable were then subject to the Stage 2 assessment.

Stage 2: Assessment against the objectives of the Hungerford Neighbourhood Plan

5.10 The purpose of the Stage 2 assessment was twofold. First it was to identify the most sustainable options when set against the context of Policy SP15 in the West Berkshire Local Plan Review for Hungerford (and the HNP) which requires the allocation sites to deliver a minimum of 55 dwellings over the plan period.

- 5.11 The list of sites that were identified through the Stage 1 process as being potentially developable had a collective housing capacity far in excess of the dwelling requirement. It was therefore necessary and appropriate to identify a shortlist of sites that would clearly enable the requirement to be met in a sustainable manner.
- 5.12 The second purpose of the assessment was to consider which sites could make the greatest contribution towards achieving the objectives of the HNP.
- 5.13 The Stage 2 assessment concluded, taking each site in turn:
- **Smitham Bridge Industrial Estate (Site HUN6):** This site is designated as an existing Protected Employment Area, and is not considered suitable for housing. The proposal to redevelop one half of a larger commercial unit for residential dwellings is considered unrealistic, and would lead to loss of employment land. ***The site is not taken forward for further consideration.***
 - **Shalbourne River (land at Smitham Bridge Road) (HUN7):** This site is merited for meeting a number of draft HNP objectives, although has limited access to some of the town's facilities/ services. ***The site is taken forward for further consideration.***
 - **Adjacent to Pennyfarthing Close (HUN8):** This site is presently active allotment space and is not considered suitable for residential use. ***The site is not taken forward for further consideration.***
 - **Adjacent to Church (HUN10):** This site is to be considered for marina use, and is not considered suitable for residential use. ***The site is not taken forward for further consideration.***
 - **Land west of Salisbury Road (HUN12):** Significant constraints identified, including isolated location on the edge of the town into the open countryside, distant from services/ facilities, potential to significantly impact upon the NL. ***The site is not taken forward for further consideration.***
 - **Land east of Salisbury Road (HUN14):** This site is merited for meeting a number of draft HNP objectives, although has limited access to some of the town's facilities/ services. ***The site is taken forward for further consideration.***
 - **Follydog Field (HUN15):** Significant constraints identified, including separation from Hungerford, distance from services/ facilities, potential to significantly impact upon the NL and the Kennet and Lambourn Floodplain SAC and River Kennet SSSI. ***The site is not taken forward for further consideration.***
 - **North of Cottrell Close (HUN20):** This site is merited for meeting a number of draft HNP objectives, although has limited access to some of the town's facilities/ services, being on the edge of smaller settlement Upper Eddington. Listed building adjacent however edge of development location alongside mitigation is considered likely to address any adverse effects. ***The site is taken forward for further consideration.***

Stage 3: Deriving reasonable spatial options

5.14 Of the eight sites assessed, three were considered to have the potential to deliver positive impacts when assessed against the HNP's objectives, and have been taken forward for further consideration.

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

5.15 It is considered that these three sites alone or in combination could deliver the identified housing need of 55 dwellings. Given the choice of sites, spatial strategy options range from 56 homes to exploring the sustainability merits of a high growth option (121 homes).

5.16 It was considered that higher growth options would explore the merits of meeting and exceeding the housing target for Hungerford, addressing affordable housing need as identified through the local Housing Needs Assessment (2019), and the West Berkshire Strategic Housing Needs Assessment (2022).

5.17 These options identified are listed below, with full options set out in **Table 5.2**, and shown spatially in **Figures 5.2 to 5.6** overleaf:

- Option 1 – Land at Smitham Bridge Road land north of Cottrell Close
- Option 2 – Land at Salisbury Road
- Option 3 – Land at Salisbury Road + Land north of Cottrell Close
- Option 4 – Land at Smitham Bridge Road + Land at Salisbury Road
- Option 5 – Land at Smitham Bridge Road + Land at Salisbury Road + Land north of Cottrell Close

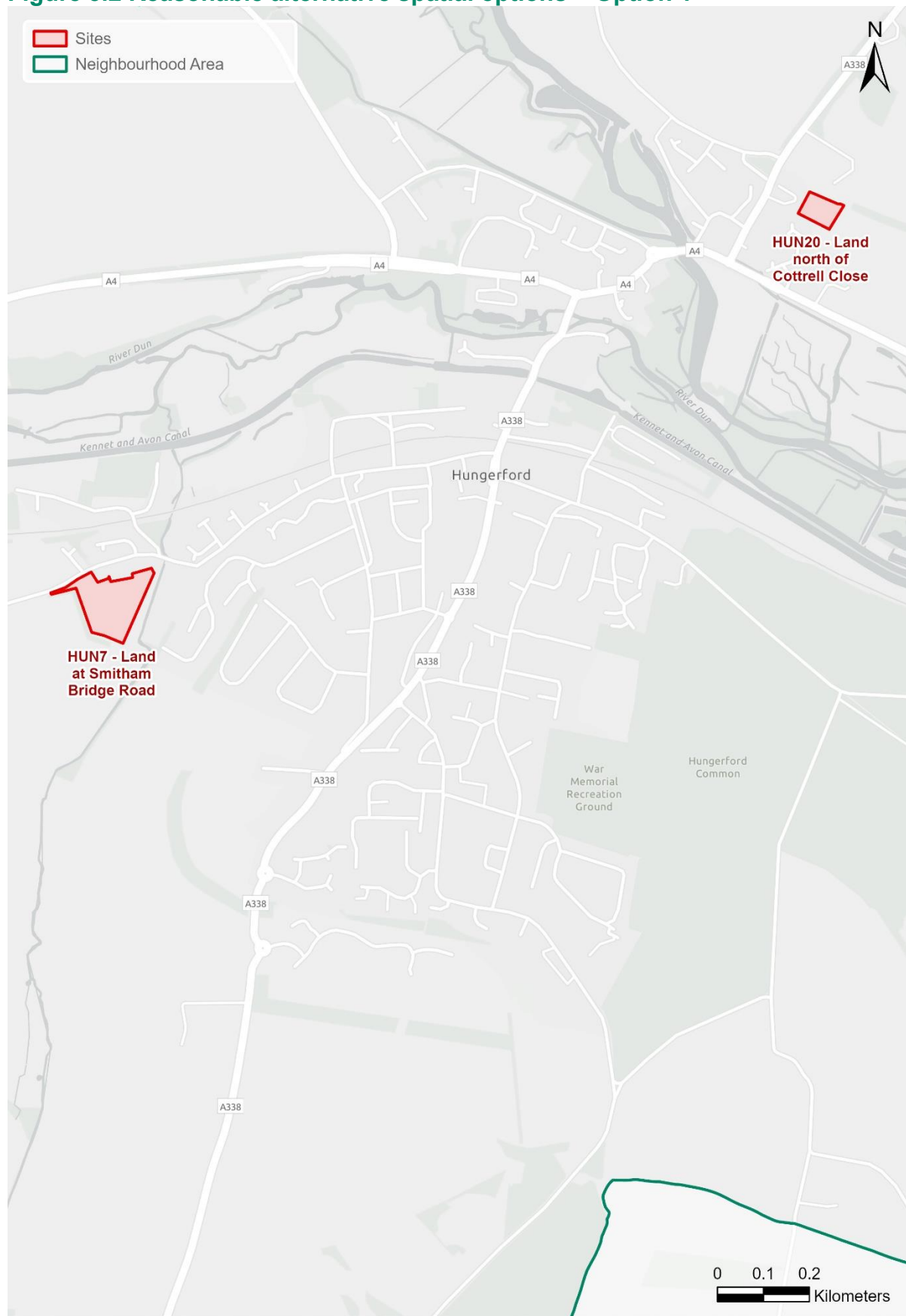
5.18 **Table 5.2** shows the sites that comprise each option, detailing the number of homes apportioned to each site.

5.19 These five reasonable alternative options have been taken forward for consideration through the SEA.

Table 5.2: HNP reasonable alternative spatial options

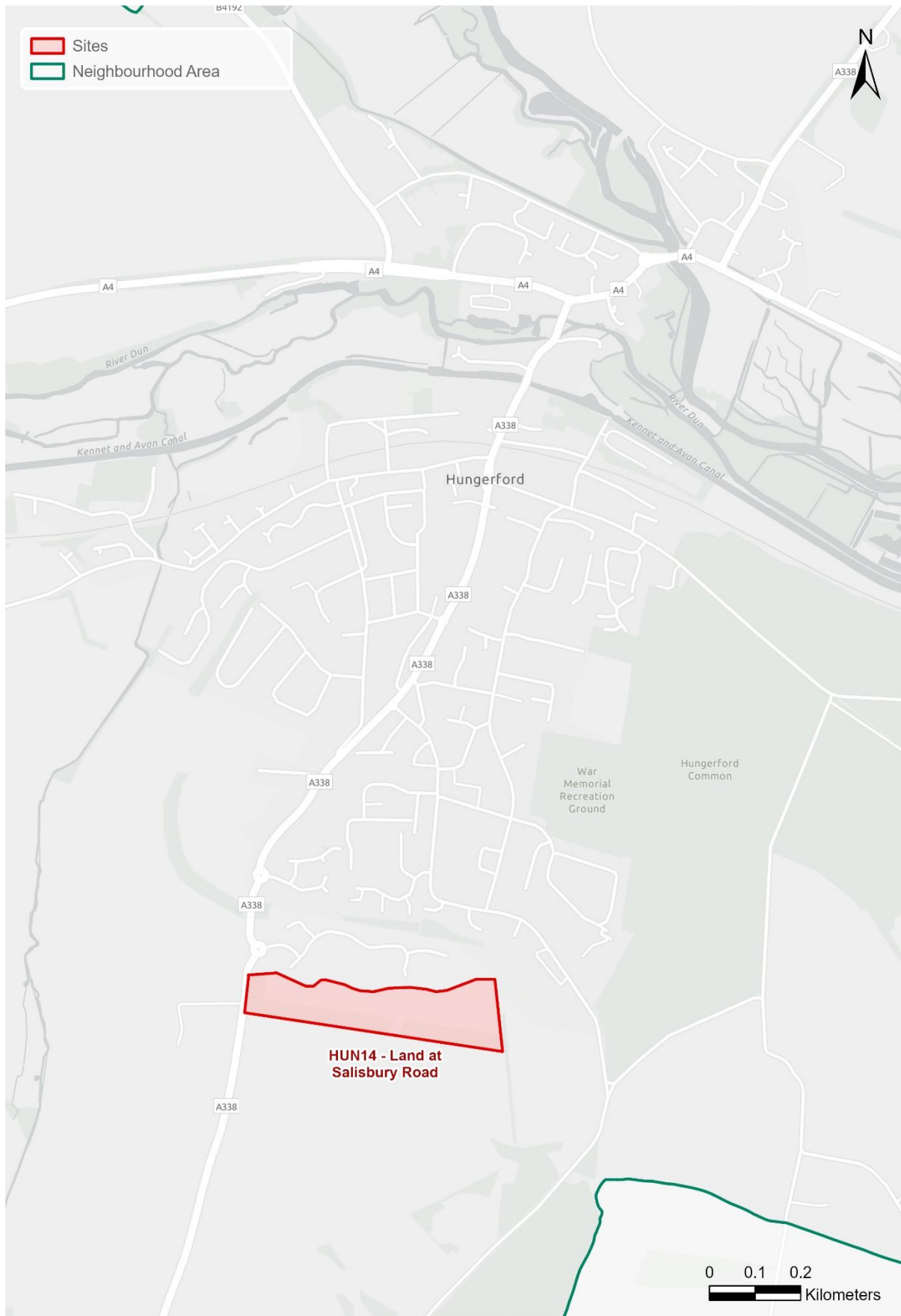
Site	Size (ha)	Option 1	Option 2	Option 3	Option 4	Option 5
Land at Smitham Bridge Road (HUN7)	2.8	44			44	44
Land at Salisbury Road (HUN14)	5.7		65	65	65	65
Land north of Cottrell Close (HUN20)	1.0	12		12		12
Total housing number		56	65	77	109	121

Figure 5.2 Reasonable alternative spatial options – Option 1



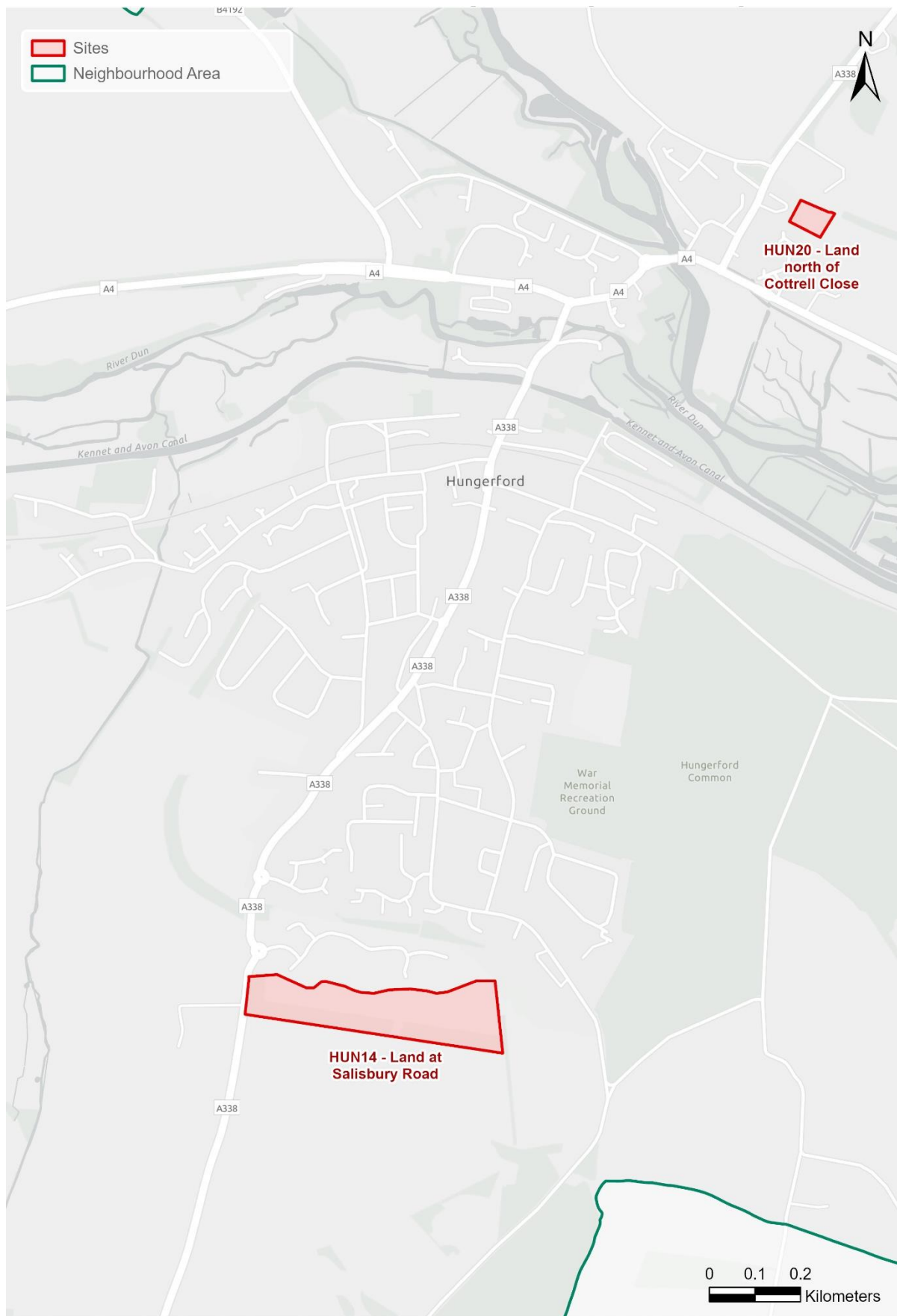
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Figure 5.3 Reasonable alternative spatial options – Option 2



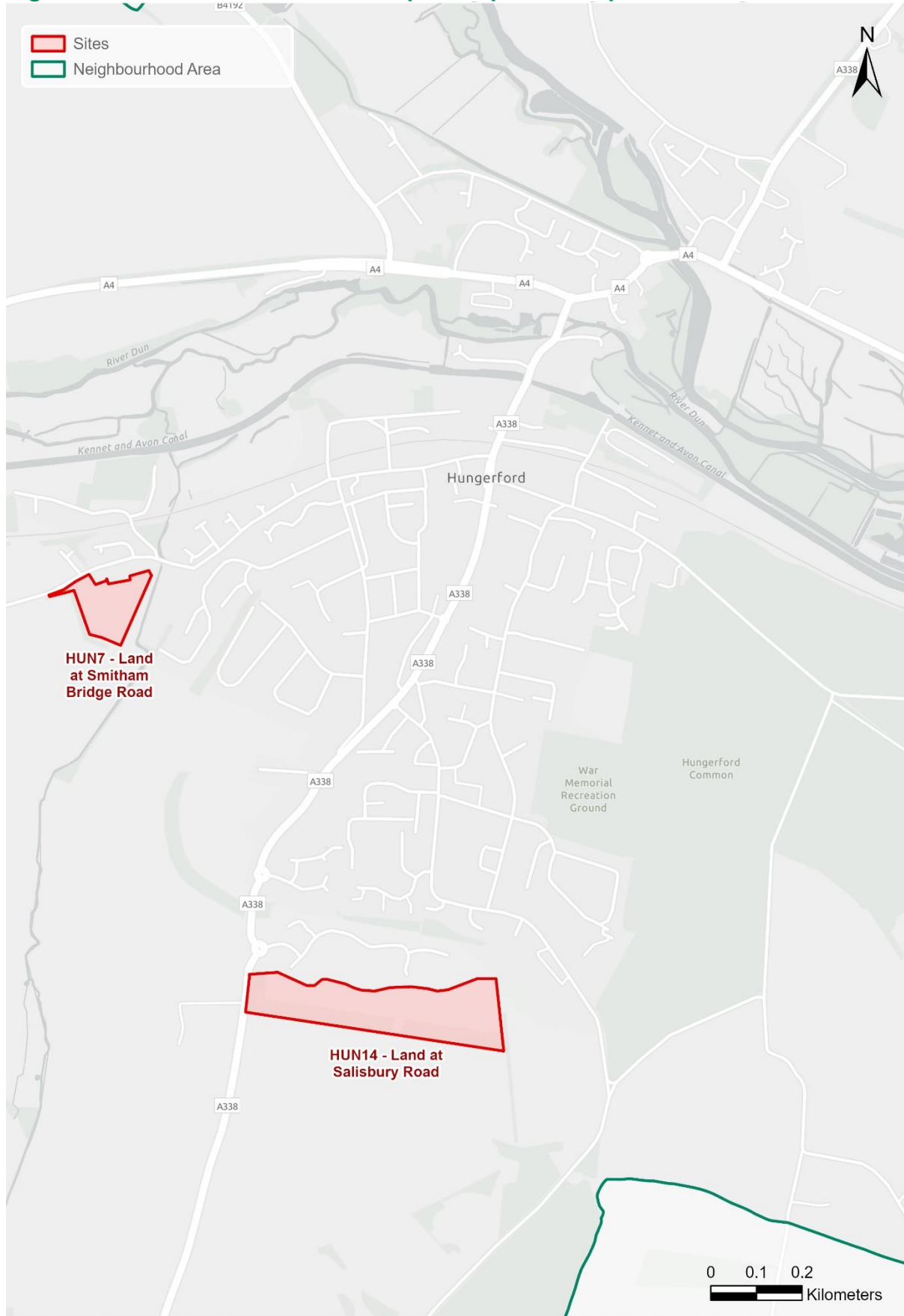
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Figure 5.4 Reasonable alternative spatial options – Option 3



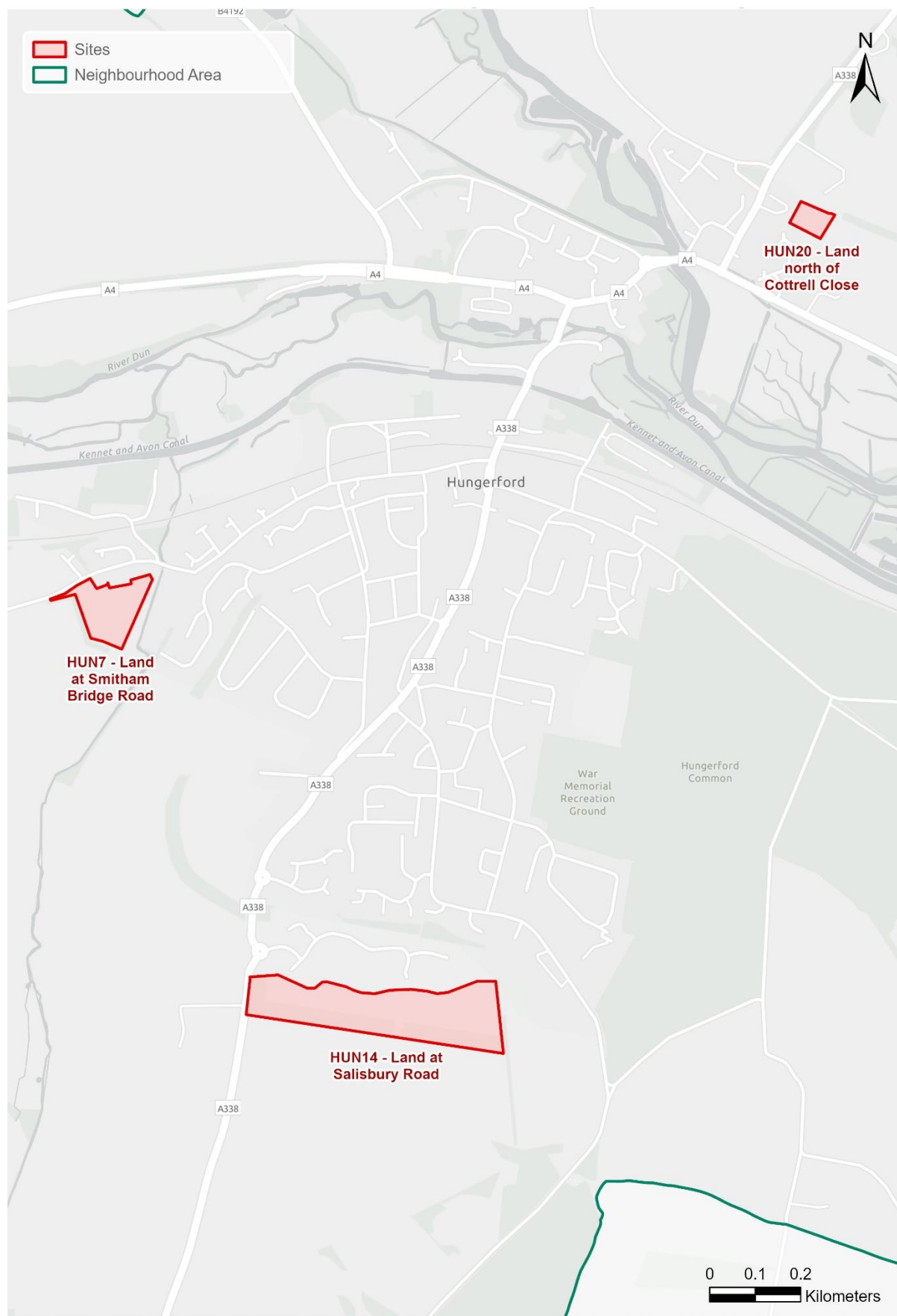
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Figure 5.5 Reasonable alternative spatial options – Option 4



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Figure 5.6 Reasonable alternative spatial options – Option 5



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6. Assessing reasonable alternatives

Introduction

- 6.1 This chapter provides the detailed findings of the assessment of the five alternative spatial strategy options within Hungerford (established in the previous chapter). The options are as follows:
- Option 1 – Land at Smitham Bridge Road + land north of Cottrell Close (56 homes)
 - Option 2 – Land at Salisbury Road (65 homes)
 - Option 3 – Land at Salisbury Road + land north of Cottrell Close (77 homes)
 - Option 4 – Land at Smitham Bridge Road + land at Salisbury Road (109 homes)
 - Option 5 – Land at Smitham Bridge Road + land at Salisbury Road + land north of Cottrell Close (121 homes)

Methodology

- 6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability topics and objectives identified through scoping (see **Appendix B**) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, however this is also stated in the text. Where appropriate, neutral effects, or uncertainty will also be noted. Uncertainty is noted with grey shading.
- 6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 6.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.
- 6.5 Finally, it is important to note that effects are predicted considering the criteria presented within the Regulations. So, for example, account is taken of the duration, frequency, magnitude, likelihood and reversibility of effects.

Biodiversity

	Option 1 (HUN7 and HUN20)	Option 2 (HUN14)	Option 3 (HUN14 and HUN20)	Option 4 (HUN7 and HUN14)	Option 5 (HUN7, HUN14 and HUN20)
No. of homes	56	65	77	109	121
Significant effect?	No	No	No	No	No
Rank	3	1	4	2	5

- 6.6 Site HUN20 is in close proximity to Kennet and Lambourn Floodplain Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), and Site HUN7 is in close proximity to Freeman’s Marsh SSSI. However, while sites HUN20 and HUN7 fall within SSSI Impact Risk Zones (IRZ), this is for development of more than 50 units. Growth proposed at the sites (44 and 12 homes respectively) would not meet this threshold, and therefore consultation with Natural England would not be required, which indicates that significant effects would not be likely.
- 6.7 In terms of the SAC, the quantum of development to be provided by site HUN20 is considered to be in conformity with the overarching Local Plan. The local plan has been subject to HRA that concluded no adverse effects on integrity, impact pathways relating to increased water demand and increased water treatment provided by the additional development that could result in an increase in water abstraction and increased effluent. This issue has therefore been addressed at a higher tier level within the West Berkshire Local Plan. All options are therefore considered likely to avoid significant negative effects on international and national designated sites.
- 6.8 In terms of the local biodiversity resource, none of the options are constrained by local designated sites nor priority habitat. The majority of sites HUN7 and HUN14 sites fall within Network Expansion Zones, which is land beyond a Network Enhancement Zone with potential for expanding and linking / joining networks across the landscape⁵. Along the northern border of HUN7 there is a strip of Network Enhancement Zone, areas of land that connect existing patches of primary and associated habitat – in this case associated with the Freeman’s Marsh SSSI. HUN20 is entirely within a Network Enhancement Zone, associated with the Kennet and Lambourn Floodplain Special Area of Conservation (SAC) and SSSI. Options including HUN7 and HUN14 will therefore likely result in the loss of greenfield sites that have a role in supporting local biodiversity networks.
- 6.9 However, it is also noted that there is potential for all options to deliver residual positive effects in terms of biodiversity through biodiversity net gain (noting the 10% mandatory requirement that came into place February 12th, 2024)⁶. Network Enhancement Zones demonstrate where development has a greater opportunity to bring forward biodiversity net gain, and therefore options including site HUN7 and HUN14 perform most positively in this respect.

⁵ Natural England (2020): ‘National Habitat Network Maps User Guidance v.2’, [online] available to access via [this link](#)

⁶ UK Gov (2021): ‘Environment Act 2021’, [online] available to access via [this link](#)

6.10 Overall, options are not considered to be particularly constrained in relation to biodiversity. Options including site HUN7 and HUN20 present an opportunity to maximise connectivity between habitats and biodiversity features given their locations within Network Expansion/ Enhancement Zones, however this could also be seen as a constraint, particularly given the extent of the Zones covering the sites. It is therefore difficult to rank options at this stage.

6.11 For the purposes of the assessment, **Option 2** is considered the most favourable, as it is least constrained by any level of biodiversity designation. While it is considered that adverse effects would be avoided, Options in close proximity to European designated sites (therefore including site HUN20) are ranked least favourably. **Option 4** therefore is ranked highly, as it does not include site HUN20. **Option 1, 3 and 5** have been ranked following by their level of growth, recognising that higher levels of growth has the potential to lead to increased effects on the local biodiversity resource. Furthermore, growth at sites is not considered strategic in scale (at which point higher growth could lead to positive effects through landscape-led masterplanning and connectivity between sites).

Climate change and flood risk

	Option 1 (HUN7 and HUN20)	Option 2 (HUN14)	Option 3 (HUN14 and HUN20)	Option 4 (HUN7 and HUN14)	Option 5 (HUN7, HUN14 and HUN20)
No. of homes	56	65	77	109	121
Significant effect?	No	No	No	No	No
Rank	2	1	3	4	5

6.12 As explored under the transportation topic (below), it is likely that any additional growth in the neighbourhood area will place increased pressure on localised congestion and capacity of roads within Hungerford, notably the A338 (High Street) and Bridge Street. Any level of new housing will result in more vehicles on the local road network, which adds to the overall greenhouse gas emissions originating in the neighbourhood area. The higher the level of growth, the greater this contribution will likely be – with Option 5 performing least favourably overall in this respect.

6.13 However, as the growth level increases, as does the potential for sustainable infrastructure to be delivered alongside development. This could include EV charging points to reduce tailpipe emissions, and small-scale renewable energy schemes to help power new development. It is however recognised that growth proposed at sites is not considered strategic in scale (at which point higher growth could be merited for utilising strategic opportunities to deliver low carbon/ renewable development). Nonetheless, it will be important under all options to support minimalised per capita emissions, including reductions in domestic energy consumption and uptake of renewable resources.

6.14 From a climate change adaptation perspective, **Options 1, 4 and 5** contain site HUN7, of which the eastern part of site is within the functional floodplain and Flood Zone 2. There is also surface water flood risk along entire eastern boundary of site. It is however noted that the areas at risk of flooding are limited in size and development can likely be focused away from it. Furthermore, in line with national policy, proposals are required to guide development away from areas at risk of flooding and ensure appropriate mitigation measures are implemented where necessary. Sites HUN20 and HUN14 are entirely within Flood Zone 1.

6.15 Overall, **Option 2** is considered the best performing, directing a lower level of growth to a site not constrained by flood risk. This is followed by **Option 3** which also does not include site HUN7, which is considered the most constrained from a climate change perspective. **Options 4 and 5** rank least favourably as HUN7 falls within these options, the options are of higher growth levels, and will likely lead to increases in CO2 emissions.

Community wellbeing

	Option 1 (HUN7 and HUN20)	Option 2 (HUN14)	Option 3 (HUN14 and HUN20)	Option 4 (HUN7 and HUN14)	Option 5 (HUN7, HUN14 and HUN20)
No. of homes	56	65	77	109	121
Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
Rank	5	1	2	3	4

6.16 The outstanding local housing requirement is 55 new dwellings, and all options perform positively through meeting and exceeding this need. The higher levels of growth delivered through **Options 4 and Option 5**, through increasing delivery, has the potential to accommodate a wider range of housing mix in terms of type and tenure. This is likely to lead to positive impacts for the vitality of Hungerford and the wider neighbourhood area. However, higher growth options also have the potential to increase pressures on the capacity of existing services and facilities. For example, an increased number of new homes in the town will likely see an increased demand for limited primary school places, and place pressure on the local road network.

6.17 However, site HUN14, which forms part of **Option 2, 3, 4 and 5** is the largest site proposed through the options, and it is recognised that as the scale of growth increases, so does the potential for development contributions. While not strategic in scale, the delivery of site HUN14 could lead to positive effects in this respect, delivering a level of on-site amenities, or contributing to improvements to existing facilities, which could include open space or community buildings.

6.18 Access to services and facilities is an important contributor to the quality of life of residents, and site HUN14 is considered to perform most positively in this respect. Site HUN14 is adjacent to the local secondary school, and within 1km of the local primary school. This is an advantage over the other two sites in consideration (HUN7 and HUN20), both of which are outside preferred maximum distance (over 2km) to either one or the other of these schools.

- 6.19 The nursery school and doctor's surgery are in close proximity to each other, so these are considered together. Site HUN7 is within 800m, while sites HUN20 and HUN14 are within 1.6km, with footpaths available providing access via active travel. **Option 2** therefore performs most positively in terms of access to health and educational facilities in the town, given HUN14 is the most accessible site. However, it is recognised that the town is struggling with the capacity of a number of facilities, particularly the doctor's surgery. Higher growth options could exacerbate this issue, despite being well located in terms of accessibility.
- 6.20 All of the sites in consideration are no more than 400 metres away from nearby green infrastructure/ green spaces, which support recreational activities. As such, growth through any option has the potential to support physical and mental health and wellbeing through enhancing access to the natural environment. Notably, HUN7 is directly opposite a play area, and HUN14 is directly adjacent to a recreational facility. In addition to the existing resource, it is noted that the delivery of higher growth presents the opportunity to coordinate green infrastructure delivery between three sites (**Option 5**) or over the larger area of site HUN14 (**Option 2**). This could bring forward greater benefits for physical and mental health, however this is dependent on the design of the option taken forward. **Options 2 - 5** (which include site HUN14) therefore perform most positively in this respect.
- 6.21 In light of the above, significant positive effects are considered likely for all options regarding community wellbeing, delivering housing in relatively sustainable locations to meet (and exceed) residual local housing needs. **Option 2** is best performing, as it delivers a moderate level of growth and is well located to access to health and education facilities, as well as having increased potential to deliver on-site amenities/ improvements to. Following this, **Option 3** is considered to be the next best performing option. **Option 3** includes site HUN14 and slightly exceeds the indicative housing target for the neighbourhood area (which could deliver a wider mix of homes), whilst having a more limited impact on the services and facilities in Hungerford.
- 6.22 High growth **Options 4 and 5** would further exceed the local housing requirement and have an increased opportunity to deliver a wider mix of housing types and tenures. **Options 4 and 5** also present an opportunity to coordinate greater green infrastructure delivery; however, these higher growth options could lead to additional pressures on existing services and facilities in the neighbourhood area which are struggling with capacity. Options are therefore ranked less well than **Options 2 and 3**, but better than **Option 1**. **Option 1** is worst performing as site HUN7 and HUN20 are more than 2km away from either the secondary or primary school.

Historic environment

	Option 1 (HUN7 and HUN20)	Option 2 (HUN14)	Option 3 (HUN14 and HUN20)	Option 4 (HUN7 and HUN14)	Option 5 (HUN7, HUN14 and HUN20)
No. of homes	56	65	77	109	121
Significant effect?	No	No	No	No	No
Rank	1	2	4	3	5

- 6.23 When considering designated heritage assets within the neighbourhood area, it is noted that HUN20 is within 50m of the Eddington Conservation Area. Options 1, 3 and 5 (which include site HUN20) therefore have the potential to impact upon the setting of the Conservation Area, its intrinsic qualities and features. It is recognised that the land in this part of the neighbourhood area is relatively flat, which could reduce the visual impact of development at site HUN20 on the setting of the Conservation Area. Furthermore, the site is connected to existing residential dwellings to the south and west, and is well screened with vegetation. In addition, it is anticipated that sensitive development design and layout could further reduce the potential for adverse effects.
- 6.24 When considering non-designated heritage assets, Site HUN14 is entirely within the boundaries of a Historic Environment Record allocated space for an 'enclosure or ring ditch, linear features and dark patches visible as cropmarks on aerial photographs'. It also covers the area of an 'irregular annular feature visible as faint cropmark'. Site HUN20 is also constrained in this respect, being directly adjacent to a 'churchyard surrounding, and next to, a 19th century former church converted to residential use, but with the northern part retained as the parish cemetery'.
- 6.25 Site HUN14, which forms part of **Options 2, 3, 4 and 5**, is the largest proposed site in the neighbourhood area. This site, which includes significant growth on large greenfield sites on the edge of the settlement, has the potential to lead to adverse effects on the local townscape / wider historic landscape. It is also important to recognise that allocating site HUN14 for development will extend the settlement boundary of Hungerford to the south, whereas the other two sites act more as infills to current settlement boundaries. Whilst lower growth (**Option 1 or 2**) is unlikely to significantly change the size and character of the settlement, higher growth options (**Options 4 and 5**) are more likely to do so. This could impact upon the setting and character of the historic environment within Hungerford and within the wider neighbourhood area.

6.26 Overall, **Option 1** is ranked most favourably as the sites within this option are not constrained by heritage assets and seeks to deliver a low level of growth within the existing settlement. It is also the only option that does not include site HUN14 which is particularly constrained, both by non-designated heritage within the site boundary and the nature of the site in the context of the historic market town. As **Options 2-5** all include site HUN14, **Option 2** is considered to be ranked second most favourable, due to the lower level of growth in comparison to the other options, however, is notably less favourable than **Option 1**. **Option 4** does not contain HUN20, which is constrained due to proximity to the Conservation Area and being adjacent to the churchyard, and as such is ranked higher than **Option 3 and Option 5**. Max growth **Option 5** is worst performing, including all site options.

Land, soil and water resources

	Option 1 (HUN7 and HUN20)	Option 2 (HUN14)	Option 3 (HUN14 and HUN20)	Option 4 (HUN7 and HUN14)	Option 5 (HUN7, HUN14 and HUN20)
No. of homes	56	65	77	109	121
Significant effect?	No	No	No	No	No
Rank	1	2	3	4	5

6.27 Sites HUN7 and HUN14 are predominately underlain by Grade 2 agricultural land which is high quality (Best and Most Versatile). Sites also include small areas of Grade 3b and Grade 4 agricultural land which is lower quality, i.e. all options include at least one site that is underlain by Best and Most Versatile (BMV) agricultural land. For site HUN20, provisional data is relied upon as no detailed surveying has been undertaken at the site. This indicates the site is underlain by Grade 3 land, which could be BMV (if found to be Grade 3a).

6.28 In light of the above it is difficult to differentiate between the options in terms of their impact on the loss of productive agricultural land, as all options will result in the loss of BMV agricultural land, with the potential for additional loss through site HUN20. Nevertheless, it is fair to assume that as the level of growth increases, so does the potential loss of BMV land. Options are therefore ranked in terms of size, with Option 5 worst performing overall.

6.29 All of the sites are greenfield in nature, the loss of which cannot be mitigated for. As above, as the level of growth increases, so does the loss of greenfield land, and therefore Option 5 is worst performing.

6.30 All of the sites fall within the Berkshire Downs Nitrate Vulnerable Zone (NVZ) (groundwater). However, the widescale nature of NVZs, combined with their strong correlation with agricultural practices, means that residential development in the neighbourhood area is unlikely to lead to adverse effects.

6.31 Taking the above into consideration, all options will lead to the loss of greenfield, high quality agricultural land, and are therefore all considered to lead to minor adverse effects on land, soil and water quality objectives. This loss is permanent and negative but largely avoidable in the absence of brownfield alternatives. Options are therefore ranked by their level of land take, although it is recognised that a level of uncertainty exists relating to the grading of agricultural land at site HUN20.

Landscape

	Option 1 (HUN7 and HUN20)	Option 2 (HUN14)	Option 3 (HUN14 and HUN20)	Option 4 (HUN7 and HUN14)	Option 5 (HUN7, HUN14 and HUN20)
No. of homes	56	65	77	109	121
Significant effect?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
Rank	1	1	3	2	4

6.32 All of the sites sit within the North Wessex National Landscape (NL – previously AONB), which needs to be taken into consideration through development so as to not adversely impact on the special qualities of the NL. All three of the sites also sit within the Hungerford Farmland Character Area of the North Wessex NL. This area has the overall management objective to conserve and enhance the quiet, rural agricultural character of the Hungerford Farmland, and enhance the landscape through restoration of the hedgerow network and planting of new woodland blocks to provide enclosure and link isolated hilltop woodland blocks.

6.33 Taking each site in turn, HUN20 is small site adjacent to existing development to the south and west. The site is elevated in terms of topography, and is visible from Hungerford Common, also with important views of the skyline.

6.34 Site HUN7 is low lying and naturally enclosed, and links well to the existing development area, although the land does rise up to the west and north and particularly on the western side. This is adjacent to open countryside, which is a valued feature of the NL, and therefore new development could adversely impact upon rural setting and views. In order to ensure it did not have a detrimental impact on the NL, site HUN7 would need to be very carefully designed to ensure that it did not sit well above the existing tree belt on the western boundary, where visibility would be high.

6.35 Site HUN14 is the largest site and is located outside the town's boundary. The site has some natural screening to the southern boundary but has a change in elevation that makes it visible and prominent in the local landscape. Notably however, since the adjoining land is already under construction the inclusion of the remaining part of the field as residential development has less impact to the overall landscape. It is therefore considered that, with sensitive design, the site would not result in harm.

6.36 All of the sites have a 'medium' landscape sensitivity. For sites HUN7 and HUN14 this is due to the sparse settlement pattern, tranquil nature, and long views and intervisibility with more sensitive adjacent areas, however the location of these sites should not majorly impact upon the sensitivities due to their adjacency to the current settlement. HUN20 is within the Leverton and

Eddington Dipslopes area, which is sensitive due to the fact that it is open in nature and exposed to views from sensitive landscapes.

- 6.37 Finally, it is worth noting here in relation to local landscape character, that all three of the sites sit in the Farmed Chalk Mosaic landscape type. One of the main concerns in this landscape area is the unsympathetic and incremental expansion of settlements, which fail to reflect the historic form of these settlements and building groups, their character and setting. Whilst adjacent to the current settlement boundary, HUN20 would extend outwards to the north and HUN14 extends a large area to the south, which could be described as urban sprawl into the open landscape. Less constrained in this respect is site HUN7, which infills an area of the settlement, providing connectivity to the existing built-up area and limiting adverse effects on the landscape (when compared with other sites).
- 6.38 In conclusion, it is considered that all options have the potential to lead to significant adverse effects on the landscape, reflective of the greenfield nature of sites within the NL, and that all sites are considered to be of 'medium' landscape sensitivity. It is however recognised that the National Landscape Management Plan Position Statement states that only on the edges of Marlborough, Hungerford, Lambourn, Pewsey, and Pangbourne will there be support for new open market housing development on greenfield land. As such, significant adverse effects could be avoided, particularly if supported by landscape-led masterplanning and green infrastructure provision, which will be explored further at the next stage of plan-making. In this respect higher growth options could be seen to perform better, for example in terms of connecting sites through a holistic approach to planning for green infrastructure within the neighbourhood area.
- 6.39 However, without further detail in terms of design and layout of new development, precautionary approach is taken at this stage. As such, lower levels of greenfield development in the NL are preferred in terms of protecting special features and meeting national landscape objectives. Therefore, in terms of ranking options at this stage, **Option 5** is considered to be the worst performing. This is due to the incremental expansion of the settlement and highest level of greenfield loss in the NL. **Option 4** is preferable over **Option 3** as it does not include site HUN20, which is potentially more sensitive than site HUN14, reflective of its elevated topography and visibility. However, site HUN14 is the largest in scale and would extend the settlement south into the open landscape. **Option 1** is considered to be best performing given its position within the existing built-up area and the low level of growth proposed, alongside **Option 2**, which is also considered to be the most favourable. These are on par due to **Option 1** including HUN20.

Transportation

	Option 1 (HUN7 and HUN20)	Option 2 (HUN14)	Option 3 (HUN14 and HUN20)	Option 4 (HUN7 and HUN14)	Option 5 (HUN7, HUN14 and HUN20)
No. of homes	56	65	77	109	121
Significant effect?	No	No	No	No	No
Rank	1	2	4	3	5

6.40 All three sites have existing vehicle, pedestrian, and cycle access, or in the case of HUN20, has the potential to create suitable access (with access currently limited in this respect). In terms of active travel, site HUN14 is intersected through the centre by a public right of way (PRoW), which should be maintained through any development, while site HUN7 is directly adjacent to a PRoW along the western boundary. Site HUN7 is directly adjacent to a cycle route along Smitham Road, and HUN20 is within 200m of the closest cycle route.

6.41 In terms of wider sustainable transport opportunities, all options perform reasonably well. Site HUN7 is within 300m of a bus stop, and Hungerford train station is 1.2km away; HUN14 is within 450m of a bus stop, and the station is 1.5km away; while site HUN20 has a bus stop within 300m, and the station is 1.5km away. Options including HUN7 (**Options 1, 4 and 5**) are therefore preferable in terms of access to sustainable, including active, travel.

6.42 Site HUN20 is the furthest from the town centre, at 1.4km away, HUN14 the next furthest at 1.3km and HUN7 the closest, 1km from the centre. All three of the sites have paved footpaths and roads directly to the centre, therefore accessible on foot, as well as by car, or bus, as all three have bus stops within 500m. Options that include site HUN7 are therefore more favourable with regard to proximity to the town centre (**Options 1, 3 and 5**). HUN20 is in close proximity to the A4, and HUN14 is directly adjacent to the A338, which makes these sites more preferable with regard to proximity to the road network. **Option 3, and Option 5** include both HUN14 and HUN20 and therefore perform well in this respect. However, options in close proximity to the road network could also be more likely to increase private vehicle usage, which would exacerbate congestion issues locally.

6.43 Site HUN14 is likely to be worst performing in this respect, as (reflective of its location and elevation) it is more likely that residents would utilise private vehicles instead of sustainable transport such as walking or cycling. This is likely to increase congestion within the centre of Hungerford, notably at the A338 (High Street) and Bridge Street which are already constrained in this respect. For this reason, **Option 1** is best performing as does not include site HUN14.

6.44 Overall, **Option 1** ranks the highest as it has the closest proximity to public transport networks and the town centre, and is immediately adjacent to cycle paths and PRow. The development of HUN14 would mean the disruption of PRow due to the path running through the area. Further, it is not entirely accessible for sustainable travel methods and on a gradient for cycling and walking, which makes options including this (**Option 2, 3, 4 and 5**) less favourable, however this site does provide access and walking proximity to both the town's primary and secondary schools. HUN20 is not currently accessible, furthest from the town centre, and in close proximity to the strategic road network which could lead to increase private vehicle use. Options including this site have been ranked lowest (**Options 3 and 5**). As higher housing numbers could result in an increased amount of traffic using the key routes into and out of the town and around the neighbourhood area (further exacerbating congestion issues), **Option 5** is considered worst performing of the options overall.

Conclusions

6.45 Table 6.1 below, and the subsequent narrative, summarises the above assessment of reasonable alternatives.

Table 6.1: Summary of assessment of reasonable alternative options

SEA theme		Option 1	Option 2	Option 3	Option 4	Option 5
Biodiversity and geodiversity	Rank	3	1	4	2	5
	Significant effect?	No	No	No	No	No
Climate change and flood risk	Rank	2	1	3	4	5
	Significant effect?	No	No	No	No	No
Community wellbeing	Rank	5	1	2	3	4
	Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
Historic environment	Rank	1	2	4	3	5
	Significant effect?	No	No	No	No	No
Land, soil, and water resources	Rank	1	2	3	4	5
	Significant effect?	No	No	No	No	No
Landscape	Rank	1	1	3	2	4
	Significant effect?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
Transportation	Rank	1	2	4	3	5
	Significant effect?	No	No	No	No	No

- 6.46 With regard to biodiversity and geodiversity, climate change and flood risk, and community wellbeing, Option 2 is the most favourable option. This is given that Option 2 only includes one site (HUN14), that is not particularly constrained by biodiversity sites or flood risk, and will exceed local housing needs on one site on the edge of the town, with the potential to deliver a mix of homes that are well located to access local services and facilities/ amenities (without significant exacerbating existing capacity issues). Option 1 is ranked the lowest for community wellbeing, which is due to being the only option to not include site HUN14. However, it is important to note that all five options present potential for significant positive effects if taken forward.
- 6.47 Option 1 is the most favourable of all of the options under the SEA themes of historic environment, land, soil, and water resources, landscape, and transportation. This is due to the fact that the sites included under Option 1 are the least constrained, as well as have the lowest level of growth/ level of greenfield loss. In comparison, Option 5 is considered to be the least favourable across all four of these themes, given the high level of growth and in-combination effects of delivering all three greenfield sites around the town and within the NL.
- 6.48 Taking a precautionary approach, all options are concluded as having the potential to lead to significant negative effects at this stage in relation to the landscape SEA theme. This reflects the loss of greenfield land in the NL.

7. Establishing the preferred approach

- 7.1 The reasons for selection and rejection of the five reasonable alternative options assessed in **Chapter 6** above has been set out below. This has been provided by Hungerford Town Council:
- 7.2 Consultation was carried out with the local community in November 2023 with the aim of identifying a preferred option. Two survey methods took place:
- a. Direct consultation on three two-hour occasions at the Hungerford Town Hall. These took place on Wednesday 1st at 14.00-16.00, 19.00-21.00 and Saturday 4th 10.00-12.00.
 - b. A web-based consultation accessed via the Town Council website.
- 7.3 The five options were set out and respondents were asked to identify their preferred option and provide the main reasons for their preference. The main reasons provided by respondents were as follows:
- Option 1 was ranked highly as residents did not wish to see increased traffic on the High Street.
 - Option 2 was ranked highly as residents did not wish to see increased traffic on Smitham Bridge and/or Church Street.
 - Lower growth options (Options 1 and 2) were ranked highly in relation to local infrastructure. It was often mentioned that the town was struggling with a number of facilities, especially the doctors surgery. The higher growth options were considered likely to lead to more significant impacts on the capacity of facilities.
 - Lower growth options (Option 1 and 2) were ranked highly in relation to the landscape, reflecting the importance of protecting the National Landscape which covers the entire neighbourhood area.
 - Options including Land at Smitham Bridge Road (Option 1 & 4) were ranked highly reflecting the need to retain the allotments.
 - The need for more affordable housing was a key reason for supporting growth under all options – as all options would meet (and exceed) the identified local housing need.
- 7.4 The town council took the responses produced from the two survey methods and collated all the information received. **Table 7.1** overleaf shows a summary of the results. The report detailing the housing site consultation can be found [here](#).

Table 7.1: Summary of Site Preference Surveys from all Responses

Option	Description	No. of responses in support of option	% of responses
1	Land at Smitham Bridge Road + Land north of Cottrell Close	112	46
2	Land at Salisbury Road	74	30
3	Land at Salisbury Road + Land north of Cottrell Close	25	10
4	Land at Smitham Bridge Road + Land at Salisbury Road	12	5
5	Land at Smitham Bridge Road + Land at Salisbury Road + Land north of Cottrell Close	16	7
N		4	2
Total		243	100%

7.5 Table 7.1, alongside the SEA findings presented above in Chapter 6, suggests that Options 3, 4 and 5 are least preferable and therefore not progressed for allocation through the Neighborhood Plan.

7.6 Option 1 received the greatest support through the survey responses, with 46% preferring this approach. Option 2 is a clear second at 30% and in practice Option 3 is similar to Option 2 as it includes the large site at Salisbury Road, with the addition of the site to the rear of Cottrell Close. However, support for both Option 2 and 3 (40%) is still less than Option 1 at 46%.

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

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

Introduction

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'pre-submission' version of the Hungerford Neighbourhood Plan. This chapter presents:

- An appraisal of the current version of the HNP under the SEA theme headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

HNP policies

8.2 The draft HNP puts forward a number of policies to guide development in the Neighbourhood Plan area. These are set out in Table 8.1 below.

Table 8.1 HNP policies

Policy number	Name
HUNG1	Housing Mix
HUNG2	Design and Character
HUNG3	Gateways into and out of Hungerford Town
HUNG4	Retrofitting Historic Buildings for Energy Efficiency
HUNG5	Retaining and Enhancing the Vitality and Viability of Hungerford Town Centre
HUNG6	Key Walk/ Cycle Routes
HUNG7	Play and Youth Facilities
HUNG8	Local Green Spaces
HUNG9	Wellbeing and Safety through Design
HUNG10	Low Energy and Energy Efficiency Design
HUNG11	Wildlife-friendly Development
HUNG12	Land at Smitham Bridge Road
HUNG13	Land north of Cottage Close

Methodology

- 8.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework.
- 8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. Policies are considered as a whole when determining significance, but there is no need to systematically appraise policies individually. These effect 'characteristics' are described within the assessment as appropriate.

9. Appraisal of the draft Hungerford Neighbourhood Plan

Biodiversity

9.1 The neighbourhood area is constrained by the following three European designated biodiversity sites, being within 10km of the Hungerford Parish boundary:

- River Lambourn Special Area of Conservation (SAC)
- Kennet & Lambourn Floodplains SAC
- Kennet Valley Alderwoods SAC

9.2 A Habitat Regulations Assessment (HRA) has therefore been carried out for the draft HNP (2024), identifying any aspects of the Neighbourhood Plan that could cause any adverse effect on the integrity of European sites. HRA screening of the draft HNP found that the two policies (site allocation policies HUNG12 and HUNG13) had the potential to cause a likely significant effect upon the European sites with regards to water quantity level and flow, and water quality impact pathways.

9.3 These two policies were taken forward for Appropriate Assessment (AA), which found that:

“The overarching Local Plan, West Berkshire Local Plan, was subject to an HRA which concluded that there would be No Significant Effects from the development it outlined, given the Water Resource Management Plans that have been prepared by Thames Water. The allocations within the Hungerford Neighbourhood plan are within the quanta provided for by the West Berkshire Local plan and therefore in combination impacts from this development can be excluded.

The possibility for these developments to impact the European sites via increased surface run-off was considered. However, given that these site allocations are located over 1km away from the SACs in question, and that Policy HUNG10 requires that development minimises surface run off utilising Sustainable drainage systems it was concluded that these developments will not have any negative impacts with regards to surface water run-off.

Therefore, it can be concluded that the Hungerford Neighbourhood Plan will not provide any negative impacts on European site, either alone or in combination with other plans and projects.”

9.4 The SEA supports these conclusions, recognising the role of Policy HUNG10 in ensuring negative effects on the integrity of European sites are avoided.

- 9.5 When considering nationally designated biodiversity within the area, noteworthy are Freeman's Marsh Site of Special Scientific Interest (SSSI) and the Kennet and Lambourn Floodplain SSSI, which coincides with the SAC discussed above. The neighbourhood area is also constrained by Ancient Woodland, eight Local Wildlife Sites (LWSs), and priority habitat; which extends across the neighbourhood area. Site allocations are not considered to be particularly constrained in this respect, however for both site allocations, supporting policy requires that ecological surveys are undertaken which are able to demonstrate that the presence of any protected species on the site can be adequately mitigated.
- 9.6 The overarching Neighbourhood Plan policy in relation to biodiversity is Policy HUNG11 (Wildlife Friendly Design), which provides protection for biodiversity, habitats, and species, and ensures that biodiversity net gains are achieved in development. Biodiversity 'net gain' has been introduced through the Environment Act, and mandates that all qualifying schemes secure a net gain of 10%. Now that the mandatory requirement for BNG is in place⁷, there is no technical need to repeat the legal requirements in local policy. The Neighbourhood Plan therefore presents an opportunity to set policy requiring a higher percentage net gain, where there is evidence to support such an approach. Requiring 'at least 10% measurable BNG', or an exceedingly ambitious '20% BNG', can be calculated using Natural England's biodiversity metric, to ensure the delivery of maximum biodiversity on site.
- 9.7 Policy HUNG11 performs sets out support for the use of green roofs, swift bricks and hedgehog-friendly fencing; recognising the importance of design features that can encourage local wildlife and biodiversity to thrive. Positive effects are also likely to be delivered in this respect through Policy HUNG9 (Wellbeing and Safety Through Design), which encourages development to deliver green infrastructure and design green spaces that create and enhance habitats for wildlife. This policy could however be strengthened through setting support for connectivity of green infrastructure and green spaces, recognising the benefits of creating biodiversity links to support habitat improvement; alongside improving the public realm.
- 9.8 Overall, no significant impacts are predicted for biodiversity. The draft HNP policy framework performs broadly positively through ensuring the mitigation of any adverse effects on biodiversity sites/ features, and setting out support for BNG. There is the potential for **minor positive effects** assuming recommendations set out above are considered.

⁷ [Biodiversity Net Gain for local authorities | Local Government Association](#)

Climate change

- 9.9 Flood risk is a key issue for Hungerford, with large sections of the neighbourhood area, specifically those adjacent to water bodies being at high risk of flooding (within Flood Zone 3). However, these are largely concentrated to the areas adjacent to rivers, as well as the Kennet and Lambourn Floodplains, which runs through the centre of the neighbourhood area to the north of the town. In terms of the two site allocations, only Land at Smitham Bridge is constrained by flood risk, with the eastern part of the site falling within the functional floodplain and Flood Zone 2.
- 9.10 In accordance with Policy HUNG12, development at Land at Smitham Bridge Road is expected to be located away from areas at high risk of surface water flooding, and incorporate sustainable drainage schemes (SuDS) to the satisfaction of the lead flood authority. This is alongside other measures that should contribute to reducing flood risk such as retention and enhancement of biodiversity features (Policies HUNG9 and HUNG11), and infrastructure upgrades alongside new development (Policies HUNG2 and HUNG9).
- 9.11 While not specifically constrained by existing flood risk within the site, reflective of the changing climate and flood risk more widely within the area, SuDs is also required for site allocation Land north of Cottrell Close; and wider policies discussed above are also of relevance here. On this basis, no significant impacts in relation to flood risk are anticipated.
- 9.12 With a climate emergency declared in West Berkshire in 2019, and a recently adopted West Berkshire Environment Strategy and Delivery Plan, the draft HNP recognises the importance of planning for climate resilience. Of note in this respect is Policy HUNG10 (Low Energy and Energy Efficient Design), which features many development requirements that will contribute to increasing resilience, including sustainable construction methods, sustainable drainage systems, modern energy efficiency standards, and high quality design principles including utilisation of trees, planting, and wider landscaping. Many of these requirements are also detailed in individual policies such as Policy HUNG9 protecting and enhancing biodiversity, as well as requiring sustainable drainage to minimise flood risk; and Policies HUNG2 and HUNG6 which seek to improve and extend footpaths and cycleways.
- 9.13 Furthermore, while not specifically within policy, the draft HNP sets out support for community scale energy generation, with a key action of the draft HNP being to work with landowners to explore the delivery of projects in this respect. This supplements emerging Local Plan Policy DM4, which provides the supportive policy framework for such provision.
- 9.14 Supporting policy text also includes Action F 'Traffic Impacts in Hungerford', which sets out support for the introduction of Electric Vehicle charging infrastructure. It is recommended that this be translated into Neighbourhood Plan policy, providing more weight to the ambition as development will be required to comply with policy. This could be included within Policy HUNG10, for example.
- 9.15 Overall, it is considered that the Draft HNP is likely to lead to **minor positive effects** in relation to the climate change SEA topic. The draft HNP sets out policies that support both climate change adaptation and mitigation, through

sustainably located growth, sustainable design and construction, and support for renewable energy and active travel uptake. The use of ultra-low emission vehicles is also supported through the wider draft HNP, however this is recommended to be moved into policy to further strengthen residual positive effects.

Community wellbeing

- 9.16 The draft HNP allocates two sites for 44 and 12 dwellings respectively, which if developed, would meet identified housing requirements in the West Berkshire Local Plan to 2041. Sites are located on the settlement edge, which minimises encroachment into the countryside and supports sustainable growth of the town.
- 9.17 Both site allocations are required to deliver a mix of dwelling sizes and affordable housing in accordance with the wider policy framework, which highlights affordable housing as a key issue for the town. A key objective of the draft HNP is therefore to ensure housing development provides a range of house types, sizes and tenures that meets the needs of all age groups and incomes. To meet this objective, Policy HUNG1 (Housing Mix) requires that developments of five dwellings or more should provide a mix of dwelling sizes and types that reflect the requirements of the West Berkshire Strategic Housing Needs Assessment (SHNA) (2022), and the needs of both first-time entrants to the housing market and older downsizers. Policy HUNG2 further requires a range of densities, house types (where appropriate) and plot layouts should be used by all development coming forward in the town.
- 9.18 West Berkshire promotes Hungerford as an attractive place to live and work (particularly for young people), with good facilities, services, and transport links; and is subsequently developing a town centre strategy for the area. The strategy has been informed by the Neighbourhood Plan objectives and shares the same ambitions for the area. Investing in the high street is a key objective of both the town centre strategy and the emerging HNP, with Policy HUNG5 performing particularly well.
- 9.19 The draft HNP further seeks to improve space for indoor and outdoor markets and events, and therefore Policy HUNG4 also supports temporary uses in the town centre, alongside proposals which enhance the quality and accessibility of the town centre's public realm.
- 9.20 More broadly, draft Neighbourhood Plan policies and proposals have a strong emphasis on delivering public realm improvements (including through green infrastructure provision) and community infrastructure provision. With a focus on health, policy HUNG7 (Play and Youth Facilities) supports provision and maintenance of play and youth facilities; serving the local community and supporting health and wellbeing. The policy highlights that leisure facilities are extensive locally, including outdoor leisure and recreational facilities available on the Common, the Marsh, the canal and the towpath. Both site allocations are notably within 400m of green infrastructure/ green space.
- 9.21 Nonetheless, it is recognised that as the population grows the need for facilities may increase, and as such contributions will be sought from site allocations. Notably site allocation Land at Smitham Bridge Road will be (as set out in Policy HUNG12) required to contribute towards improvement of the Smitham

Bridge Play Park. In addition to this, policy HUNG8 (Local Green Spaces) allocates four LGSs within the neighbourhood area, which will be protected from development. This will support physical and mental health and wellbeing of the local community.

- 9.22 Hungerford is well provided for with schools and health facilities which serve the local community and villages in the area, although it is noted that a number of the town's facilities struggle in terms of capacity, especially the doctor's surgery. Furthermore, both site allocations are outside the preferred maximum distance (2km) to either the primary or secondary school. The draft HNP also identifies that the ageing population places pressure on Hungerford's health and education services. Policy provisions throughout the draft HNP (discussed above and below) therefore seek to address demographic issues locally and support infrastructure investment; however it is recognised that, particularly in relation to school places, this is primarily the role of West Berkshire.
- 9.23 Hungerford has three employment areas protected through Local Plan policy; these are at Charnham Park, Station Road and Smitham Bridge Road. The draft HNP sets out a number of actions to support employment locally, both investing further in protected sites and maximising other opportunities in the town, including growing tourism.
- 9.24 Finally, whilst the draft Neighbourhood Plan is not supported by a specific set of detailed design codes, the principles of West Berkshire emerging Local Plan Policy SP7 – which itself references the National Design Guide – are reinforced through Policy HUNG2 (Design and Character) with respect to specific local issues of diversity, landscape and movement. High quality design and layout is required, which respects the local character of Hungerford.
- 9.25 Policy HUNG9 (Wellbeing and Safety Through Design) states that development should be designed to maximise the wellbeing of its residents, visitors and users. The landscaping and layout of green infrastructure and spaces should demonstrate that all opportunities have been taken to create a high quality environment that people can actively engage with. Development is also encouraged to demonstrate, through its design, how it will minimise the opportunities for crime to occur, recognising that this is an issue for the town.
- 9.26 Overall, the draft HNP performs well from a community wellbeing perspective by allocating sustainably located sites to meet the identified local housing need. The policy framework seeks to deliver an appropriate housing mix, including affordable housing, and supports improvements to the public realm, community facilities, and employment opportunities. Hence, **significant positive effects** are concluded.

Historic environment

- 9.27 Hungerford town is rich in history, with a conservation area extending throughout the town centre. Hungerford also includes many Grade II and Grade II* listed buildings, which are predominately focused along the High Street, and a scheduled monument.
- 9.28 While the Local Plan (alongside higher level policy provisions) provide a level of protection to assets, it is considered that the draft HNP could be strengthened by including a heritage policy. This policy could set localised requirements for the protection and enhancement of the historic environment, including designated and non-designated assets, and establish development guidelines for the area. [Planning Practice Guidance](#) and [Historic England](#) provide guidance in this respect, and it is considered that there is opportunity for a local heritage policy to be “distinct to reflect and respond to the unique characteristics and planning context of the neighbourhood area”. This would supplement Local Plan policy while addressing the absence of a Conservation Area Appraisal (CAA). As identified through scoping this is a clear evidence gap for the neighbourhood area.
- 9.29 Policy HUNG4 does however consider designated assets and is merited from a heritage perspective. Specifically, the policy addresses the issue of the quality of refurbishment of Listed Buildings and the conservation area. Policy HUNG4 supports sensitive retrofitting of energy efficiency measures in historic buildings, provided that it safeguards the historic characteristics of heritage assets. Also noteworthy is Policy HUNG2 (Design and Character), which places focus on building heights and rooflines; supporting diversity of frontage, scale and form, with building heights that reflect the prevailing height of surrounding buildings. This is unless it can be demonstrated that a taller building could complement or enhance the local character.
- 9.30 In terms of the wider historic landscape, the draft HNP highlights that it will be important to retain the traditional character of Hungerford and to protect the Marsh, Common and surrounding countryside. Policy HUNG3 (Gateways into and out of Hungerford Town) is noteworthy in this respect, protecting and enhancing the historic landscape and setting of the town that is important to the Wessex Downs NL. This is discussed further under the landscape SEA theme.
- 9.31 In terms of the two site allocations, Land north of Cottrell Close is ‘constrained’ by Grade II listed building to the west of the site. The Hungerford Conservation Area is also relatively close to the site. Policy HUNG12 states that the setting of the Grade II listed building to the west of the site and the Hungerford Conservation Area will be preserved.
- 9.32 Land at Smitham Bridge Road is not constrained by designated heritage assets, however vehicular access will be on to North Standen Road which is an identified gateway into the town (through Policy HUNG3). Policy HUNG12 therefore requires that the design of the dwellings will reflect the character of the surrounding area and protects North Standen Road’s role as a gateway into Hungerford. Policy HUN3 sets out the importance of the setting of the town and it’s gateways in terms of preserving local identity. This reflects the presence of the NL, discussed further under the landscape SEA theme below.

- 9.33 Overall, the draft HNP performs well by ensuring that the site allocations are appropriately designed to minimise potential adverse impacts on the setting and significance of nearby heritage assets and historic landscape features. It is considered that this would largely be achieved through appropriate siting and building height, as well as screening around the perimeter of sites.
- 9.34 The policy framework supports the site-specific policies by highlighting the importance of protecting and enhancing the historic environment through development design and retrofitting, however recommendations set out above could strengthen the potential for residual positive effects in this respect. As any adverse effects are likely to be avoided and/ or mitigated, **neutral effects** are concluded at this stage.

Land, soil and water resources

- 9.35 It is important that the draft HNP seeks to protect the neighbourhood area's land, soil and water resources, particularly where resources are irreplaceable. In terms of the area's agricultural land resource, a key consideration is the development of two site allocations on the settlement edge. Post 1988 data is available for Land at Smitham Bridge Road, which shows that the majority of area is Agricultural Land Classification (ALC) Grade 2, with an area of Grade 3b to the western border of the site and a strip of Grade 4 land adjacent to the eastern border of the site. Grade 1 – 3a is considered to be Best and Most Versatile (BMV), and therefore the permanent loss of Grade 2 ALC is identified as a significant negative effect.
- 9.36 Post 1988 data is not available for Land north of Cottrell Close, and therefore indicative Agricultural Land Classification (ALC) is relied upon. This shows that Grade 3 land covers the entire site, however it does not distinguish between Grade 3a (which is BMV), or Grade 3b (which is not). Uncertainty therefore exists at this stage without undertaking detailed land classification. Nonetheless, the allocation of the two sites for housing will inevitably lead to the loss of up to 4ha greenfield land, reinforcing the significant negative effects concluded above. Though the magnitude of effects is relatively low with regards to the agricultural land resource across Wiltshire, it is considered that the effects are significant in the context of the Neighbourhood Plan area and the loss of a higher grade of land (i.e. Grade 2).
- 9.37 Water is supplied to the neighbourhood area by Thames Water, who are also responsible for sewerage services in this area. Their Water Resources Management Plan (WRMP) identifies how they expect to balance the demand for water with available supplies over an 80-year plan period. The WRMP indicates that there is adequate supply over this period without a need to develop new sources of water. Policy HUN10 (Low Energy and Efficient Design) requires that proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, must demonstrate how the design of buildings and site layouts minimise consumption of water.

- 9.38 There are a number of waterbodies that run through the neighbourhood area, and as such it will be important for appropriate drainage and mitigation to be delivered alongside development. All development will therefore be required to (Policy HUN10) minimise surface water runoff, incorporating mitigation and resilience measures – notably maximising the use of porous surfaces on open areas such as driveways.
- 9.39 Overall **minor long-term negative effects** are concluded as a result of new housing development and subsequent loss of approximately 4ha of greenfield land and a level of BMV agricultural land in the neighbourhood area. This loss is permanent and negative but largely avoidable in the absence of brownfield alternatives. It is also noted that the extent of effects in relation to the loss of BMV agricultural land are uncertain until a site-level assessment can determine precise soil quality at Land north of Cottrell Close.

Landscape

- 9.40 The Neighbourhood Area lies within the North Wessex Downs National Landscape (NL) (previously Area of Outstanding Natural Beauty). Notably in this respect are the entry points into Hungerford along main and smaller routes, which provide a range of views of the entry to the town as the landscape changes from rural to urban. Policy HUNG3 (Gateways into and out of Hungerford Town) recognises the importance of preserving the open feel and rural countryside of the NL within the urban town. Specifically, 'Gateways' are identified on Figure 5.1 within the draft HNP and listed in Policy HUNG3, to further reinforce the importance of key routes. Protecting and enhancing key 'gateways' is anticipated to support the wider landscape, creating favourable first impressions and a soft boundary between the countryside and the town.
- 9.41 Site allocation Land at Smitham Bridge Road (44 dwellings) is relevant in this respect, as vehicular access will be on to North Standen Road which is one of the identified gateways into the town. The site allocation policy (HUNG11) therefore requires that the design of the dwellings reflects the character of the surrounding area and protects North Standen Road's role as a gateway into Hungerford.
- 9.42 More broadly it is important to consider both site allocations in the context of the NL, recognising that Hungerford is one of the two largest settlements inside the NL boundary (alongside Marlborough). The [National Landscape Management Plan](#) Position Statement states that only on the edges of Marlborough, Hungerford, Lambourn, Pewsey, and Pangbourne will there be support for new open-market housing development on greenfield land. This is compared to in other areas, where there will be strict tests to minimise the impact on the landscape. It is considered that this includes sites such as the draft HNP site allocations, being well connected to the existing settlement, and supported policy provisions which seek to ensure design and layout respect the landscape.
- 9.43 Site allocation Land north of Cottrell Close (12 dwellings) is not constrained by a gateway to the town, but the site does slope down to the south/south west and as such could be visible from Hungerford Common. This is addressed through Policy HUNG2, which requires that the design of dwellings reflect the character of the surrounding area and minimises the impact on views from Hungerford Common (Policy HUNG12).

- 9.44 The site allocations are therefore considered likely to be able to minimise any potential adverse effects on the landscape, particularly when supported by the wider policy framework (notably Policy HUNG2 which further ensures respect of the local character of Hungerford); alongside higher level planning policy. However, it is recommended that the site allocation policies be revised to reference the need for consideration to be given to the NL and its Management Plan; recognising that the Management Plan includes specific development guidelines for sustainable growth in the NL.
- 9.45 Finally, other policies that consider impacts on landscape character include HUNG5 (Retaining and Enhancing the Vitality and Viability of Hungerford Town Centre), HUNG6 (Key Walk/ Cycle Routes), HUNG8 (Local Green Spaces), HUNG10 (Low Energy and Energy Efficient Design), and HUNG11 (Wildlife-Friendly Development). Notably Policy HUNG8 designates Lancaster Park green spaces as LGS to retain its character and setting on the edge of the town within the NL.
- 9.46 Overall, the draft HNP performs well by seeking to ensure that the site allocations on greenfield land within the NL are designed to reduced adverse impacts on the landscape, its intrinsic qualities, features, and setting. Furthermore, it is recognised that growth on the settlement edge is broadly supported through the NL Management Plan, reflecting the need for Hungerford (as a key market town) to sustainably grow.
- 9.47 The wider policy framework supports the site-specific policies by designating local green spaces to protect important green areas in the neighbourhood area. This is in addition to protecting habitats and wildlife, alongside wider landscape character through appropriate design and layout.
- 9.48 Nevertheless, given the development of 56 homes on greenfield land in the NL, **minor negative effects** are concluded.

Transportation

- 9.49 In terms of accessibility, Hungerford town lies within key transport routes, notably being at the crossroads of the A4, the old London to Bath route and the A338 between Oxford and Salisbury. The M4 and A34 are also close by, providing access to the rest of the country.
- 9.50 However, in response to strategic accessibility, there is high car ownership and car dependence within the town. Subsequently, along the High Street which forms part of the A338, there is a tension between high volumes of traffic and local residents and businesses. A key issue identified for the town is the local and strategic traffic impacts and speeds compromising the local environment, notably around the Hungerford Town Centre Commercial Area.
- 9.51 In terms of public transport, Hungerford train station connects the town with regular services to Reading and Paddington, and westwards to Westbury, Taunton and Exeter. The rail station has inadequate parking supply and lacks facilities. Furthermore, rail services have recently been cut back, and the draft HNP identifies the need for further improvements to the station and its services as a key issue for the town. The Town Council seek to work with West Berkshire Council Highways team and the local train operator to improve the rail services and facilities at Hungerford Station.

- 9.52 Bus services run frequently through the town to Swindon, Marlborough and Newbury, however footpaths and cycleways are less extensive given the size of the town. The draft HNP therefore seeks to focus on making improvements for pedestrians and cyclists in order to encourage active travel uptake. The draft HNP notably identifies a series of Key Walk/Cycle Routes where improvements will have the greatest potential to increase levels of walking and cycling and at the same time reduce pollution and improve road safety for pedestrians and cyclists. Policy HUNG6 sets out support for any proposals to enhance these routes, and also requires development proposals to ensure safe and continuous pedestrian routes that connect to these Key Walk/Cycle Routes.
- 9.53 Policy HUNG6 also sets out specific support for provision of segregated cycle and pedestrian routes. This is likely to increase modal shift, delivering multiple health benefits for residents and visitors alike.
- 9.54 Policy HUNG2 supplements Policy HUNG6, requiring all new development to integrate with and enhance the form of its existing surroundings, with all connections including road patterns ensuring permeability for cyclists and pedestrians. Site allocations perform reasonably positively in this respect; Land north of Cottrell Close is the furthest from the town centre at 1.4km away, while Land at Smitham Bridge Road is within 1km. Both sites benefit from access to nearby bus stops, and paved footpaths and roads directly to the centre, which the site allocation policies seek to capitalise upon.
- 9.55 For example, development at Land at Smitham Bridge Road (Policy HUNG12) will be required to upgrade Public Right of Way HUNG46 so that it is capable of everyday use all year-round and has suitable lighting for use after dark. Linking the new housing allocations, as well as the existing parts of the town, into a network of safe walking and cycling routes will likely encourage modal shift, reducing vehicular use in the town centre.
- 9.56 Finally, parking is notably identified as a local issue, particularly in the town centre where supply is limited and markets are held weekly, drawing residents and visitors to the town. Policy HUNG2 (Design and Character) recognises that new development could exacerbate this issue, and therefore requires that parking to support residential uses should be provided within the development, in accordance with West Berkshire Council parking standards. Supporting connectivity and accessibility to the town centre via public/ sustainable transport will also contribute positively to addressing parking issues through reducing demand for parking. Policies HUNG2, HUNG5, HUNG6, HUNG8, HUN10 and the site allocation policies all perform positively in this respect.
- 9.57 Overall, it is recognised that the neighbourhood area is broadly well connected, with good access to sustainable travel. While there are also notable transportation and movement constraints to growth in the neighbourhood area (parking, congestion, PRow), the draft HNP works to address the constraints head on in new development, with great emphasis placed on the sustainable location of sites, improving infrastructure and connectivity, and maximising active travel opportunities. On this basis, **neutral effects** are considered most likely (i.e. the increased traffic associated with housing growth is likely to be offset by a number of improvements to transport locally).

10. Conclusions and recommendations

Conclusions

- 10.1 Overall, **significant positive effects** are predicted in relation to community wellbeing, reflective of the allocation of relatively sustainably located sites that should ensure that the identified local housing need is met in full. The policy framework seeks to deliver an appropriate housing mix, including affordable housing, and supports improvements to the public realm, community facilities, and employment opportunities.
- 10.2 **Minor positive effects** are considered most likely in relation to both biodiversity, and climate change. This reflects the avoidance of impacts expected by the spatial strategy (site allocations), and additional policy measures which seek to improve biodiversity and increase climate resilience (once recommendations have been adopted).
- 10.3 **Minor negative effects** have been concluded for landscape given the development of 56 homes on greenfield land in the NL. While it is recognised that the NL Management Plan sets out support for appropriately located development on the edge of key settlements in the NL, and policy provisions set out design requirements, etc.; given evidence identifies the sites as being of medium sensitivity, negative effects are unlikely to be wholly avoided.
- 10.4 **Minor negative effects** have also been concluded in relation to the land, soil and water SEA theme, reflective of the loss of approximately 4ha of greenfield, high quality agricultural land. This loss is permanent and negative but largely avoidable in the absence of brownfield alternatives.
- 10.5 **Neutral effects** are identified for the transportation SEA theme as development will likely integrate well with the town and will be sustainably located supported by policy provisions to ensure growth does not exacerbate existing local issues.
- 10.6 **Neutral effects** are also identified in relation to the historic environment. The draft NP policy framework performs well through seeking to protect and enhance the local historic environment and setting out support for retrofitting and positive design. However, recommendations set out could strengthen the potential for residual positive effects overall.

Recommendations

10.7 The following recommendations are made for consideration:

- 10.8 While the Local Plan (alongside higher level policy provisions) provides a level of protection to assets, it is considered that the draft HNP could be strengthened by including a heritage policy. This policy could set localised requirements for the protection and enhancement of the historic environment, including designated and non-designated assets, and establish development guidelines for the area. The PPG and Historic England provide guidance in this respect, and it is considered that there is opportunity for a local heritage policy to be “distinct to reflect and respond to the unique characteristics and planning context of the neighbourhood area”. This would supplement Local Plan policy while addressing the absence of a Conservation Area Appraisal (CAA). As identified through scoping this is a clear evidence gap for the neighbourhood area.
- 10.9 Supporting draft HNP policy text includes Action F ‘Traffic Impacts in Hungerford’, which sets out support for the introduction of Electric Vehicle charging infrastructure. It is recommended that this be translated into Neighbourhood Plan policy, providing more weight to the ambition as development will be required to comply with policy. This could be included within Policy HUNG10, for example, and help contribute towards transport and climate objectives.
- 10.10 The overarching Neighbourhood Plan policy in relation to biodiversity is Policy HUNG11 (Wildlife Friendly Design), which provides protection for biodiversity, habitats and species, and ensures that biodiversity net gains are achieved in development. Biodiversity ‘net gain’ has been introduced through the Environment Act, and mandates that all qualifying schemes secure a net gain of 10%. Now the mandatory requirement for BNG is in place, there is no technical need to repeat the legal requirements in local policy. The Neighbourhood Plan therefore presents an opportunity to set policy requiring a higher percentage net gain, where there is evidence to support such an approach. Requiring ‘at least 10% measurable BNG’, or an exceedingly ambitious ‘20% BNG’, can be calculated using Natural England’s biodiversity metric, to ensure the delivery of maximum biodiversity on site.
- 10.11 Policy HUNG11 performs sets out support for the use of green roofs, swift bricks and hedgehog-friendly fencing; recognising the importance of design features that can encourage local wildlife and biodiversity to thrive. Positive effects are also likely to be delivered in this respect through Policy HUNG9 (Wellbeing and Safety Through Design), which encourages development to deliver green infrastructure and design green spaces that create and enhance habitats for wildlife. This policy could however be strengthened through setting support for connectivity of green infrastructure and green spaces, recognising the benefits of creating biodiversity links to support habitat improvement; alongside improving the public realm.
- 10.12 It is recommended that the site allocation policies be revised to reference the need for consideration to be given to the North Wessex NL and its Management Plan; recognising that the Management Plan includes specific development guidelines for sustainable growth in the NL.

Part 3: What are the next steps?

11. Next steps and monitoring

11.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Next steps

11.2 This Environmental Report accompanies the Hungerford Neighbourhood Plan for Regulation 14 consultation.

11.3 Following consultation, any representations made will be considered by the Town Council and the Neighbourhood Plan and Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, West Berkshire Council (WBC), for subsequent Independent Examination.

11.4 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

11.5 If the Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by WBC. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Hungerford Neighbourhood Plan will become part of the Development Plan for the Hungerford.

Monitoring

11.6 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

11.7 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by WBC as part of the process of preparing its Annual Monitoring Report (AMR). No significant effects are considered likely in the implementation of the Hungerford NP that would warrant more stringent monitoring over and above that already undertaken by WBC.

11.8 Though significant positive effects are predicted in relation to Community Wellbeing, it is considered that the existing monitoring framework within the WBC AMR includes sufficient indicators to monitor such effects.

11.9 Monitoring arrangements will be confirmed in an SEA Statement, which is prepared once a plan is 'adopted'.

Appendix A Regulatory Requirements

As discussed in **Chapter 1** above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA.1** overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA.2** explains this interpretation. **Table AA.3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table AA.1 Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁸
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
What is the sustainability 'context'?	<ul style="list-style-type: none"> Relationship with other relevant plans and programmes. The relevant environmental protection objectives established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What is the sustainability 'baseline'?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the submission version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan.
What happens next?	<ul style="list-style-type: none"> The next steps for the plan making /SEA process.

⁸ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Table AA.2 ‘Checklist’ of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’) and Appendix B.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been considered during its preparation;	The SEA framework is presented within Appendix B. Also, Appendix B presents key messages from the context review. With regards to explaining “how...considerations have been taken into account”, Chapter 7 explains the Town Council’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a ‘stand-out’ plan policy area). Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 5 deals with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Town Council’s ‘reasons for selecting the preferred option’ (in-light of alternatives assessment).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.

10.A non-technical summary of the information provided under the above headings

The NTS is provided at the beginning of this Environmental Report.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

This draft Environmental Report is published alongside the 'pre-submission' version of the Neighbourhood Plan, with a view to informing Regulation 14 consultation.

The SA must be considered, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

This Regulation 14 Environmental Report, alongside consultation responses, will inform plan finalisation.

Appendix B SEA Scoping

Introduction

This appendix presents additional information on the SEA scope, namely key issues under each of the SEA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents a summary of responses received as part of the scoping consultation, followed by the SEA Framework.

Air quality

- The HNP is intending to allocate housing sites and these are likely to generate more trips by private car than would likely be the case in the absence of the Plan. This has potential to generate increased particulates and nitrogen dioxide.
- There are no AQMAs within or in proximity to the Hungerford neighbourhood area. The closest AQMA is the Marlborough AQMA, located approximately 9.4km west in Wiltshire.
- Given the distance of the neighbourhood area from AQMAs, existing air pollution is at a low baseline and that the Hungerford Neighbourhood Plan is unlikely to deliver a significant level of development, the potential for the HNP to lead to significant negative effects in relation to air quality is negligible. In combination with the fact that no air quality exceedances have been recorded within the neighbourhood plan area, this theme is **SCOPED OUT** of the SEA. This means that the plan will not be assessed for its performance against air quality objectives (given that no significant issues or opportunities are expected to arise through the HNP).
- Nevertheless, positive planning could be beneficial for air quality through opportunities to improve accessibility, particularly in terms of active travel and encouraging more local journeys and sustainable connections. Therefore, opportunities which address issues such as accessibility and sustainable communities whilst also enhancing air quality are encouraged.

Biodiversity

- The NP should seek to protect the SSSIs and SACs within and surrounding the neighbourhood area, utilising opportunities for biodiversity net-gain to recover these designations.
- There are areas within the Hungerford neighbourhood area that present an opportunity to enhance biodiversity value and connectivity. The HNP should take advantage of these opportunities where possible to secure biodiversity net-gain in line with national policy.
- The HNP presents an opportunity to improve biodiversity and geological quality in the neighbourhood area by encouraging development to incorporate biodiversity net-gain techniques and features. Furthermore, the HNP could encourage the creation and / or recovery of habitats in identified Network Enhancement Zones and Network Expansion Zones, which will bring biodiversity benefits to the neighbourhood area and within its setting.

Climate change

- Large sections of the neighbourhood area, specifically those adjacent to water bodies are at high risk of flooding, falling into Flood Zone 3. However, these are largely concentrated to the areas adjacent to rivers, as well as the Kennet and Lambourn Floodplains, which runs through the centre of the neighbourhood area. New development in the neighbourhood area has the potential to exacerbate flood risk if it is built within and in proximity to areas at higher risk of fluvial and surface water flooding. Development should be focused away from these areas where possible.
- It is likely CO₂ emissions originating from the neighbourhood area will increase as the population grows. It will be important for new development to adopt best building practices to limit the increase in emissions, such as using sustainable materials and incorporating renewable energy infrastructure.
- CO₂ emissions associated with the transport sector remain higher than other sectors in West Berkshire. This highlights the importance of accessible development and the delivery of sustainable transport infrastructure. The HNP can seek to address this locally, particularly by strengthening active travel routes and opportunities to increase self-containment.

Community Wellbeing

- The neighbourhood area experiences higher levels of deprivation with regards to the barriers to housing and services deprivation domain. The HNP presents an opportunity to reduce this type of deprivation by encouraging housing development in more accessible locations and supporting increased affordable housing.
- New housing development in the neighbourhood area has the potential to increase pressure on existing community infrastructure if this is not improved alongside development. This could lead to negative impacts in the longer term, for example if the capacity of health facilities is not increased to cater for the growing population.

Historic environment

- The neighbourhood area includes numerous heritage assets, all of which present a constraint to future development due to the need to avoid impacts to the heritage assets and their setting. The HNP can help overcome this by ensuring any development that comes forward during the plan period is sensitive to the historic setting of the neighbourhood area in terms of design and layout.
- The lack of CAAs and management plans for the conservation areas present a gap in the evidence base, Hungerford Council should seek to work with West Berkshire to develop the evidence base in this respect.
- The neighbourhood area has a unique heritage that is represented by its former land uses. Especially taking into regard the advice from the Historic Environment Action Plan, encouraging opportunities to preserve this heritage through the HNP should be taken where appropriate, which will

allow for the historic environment to continue to contribute to Hungerford's unique character.

Land, soil and water resources

- Allocating land for development could influence changes to land, soil and water resources. It will be important for development to be focused away from BMV land, as well as Grade 2 ALC land and consider potential impacts on the overlapping waterbody catchments and water quality. This could include implementing mitigation measures to ensure water pollution does not occur throughout the development phases.
- It will be important to use the HNP as an opportunity to improve and protect the waterbodies within the area, especially the Middle Kennet (Hungerford to Newbury) which is currently in poor condition and the Shalbourne (source to Kennet at Hungerford) which is currently in moderate condition.

Landscape

- Due to the location of the neighbourhood area within the North Wessex Downs NL, the Hungerford Neighbourhood Plan should have regard to its setting, and to the aims and objectives of the North Wessex Downs AONB Management Plan.
- It will be important for the Hungerford NP to protect the local landscape, including its coherence and characteristics with regard to its NCAs and LCAs. This will bring benefits to other SEA themes, including biodiversity and climate change, by maintaining features which support wildlife and natural processes, such as meadows and parklands.

Transportation

- Future development in the neighbourhood area has the potential to increase the number of vehicles on local roads. This could exacerbate existing traffic and congestion during peak periods and potentially lead to parking issues in the neighbourhood area.
- Car use in the neighbourhood plan area is significantly higher than the district, and region average. Given the rural nature of the neighbourhood plan area, Hungerford will likely continue the reliance on the private vehicle for travel.
- The cycle routes and PRow within the neighbourhood area could be improved, with better connectivity throughout the area.

SEA Framework

SEA theme	SEA objective	Supporting assessment questions
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity.	<ul style="list-style-type: none"> • Protect and enhance nationally and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites? • Protect and enhance semi-natural habitats as well as priority habitats and species, including ancient woodland? • Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change.	<ul style="list-style-type: none"> • Reduce the number of journeys made and reduce the need to travel? • Promote the use of more sustainable modes of transport, including walking, cycling, public transport, and electric vehicle (EV) infrastructure? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources, or reduce energy consumption from non-renewable resources? • Improve and extend green infrastructure networks in the neighbourhood area? • Sustainably manage water run-off, and reduce runoff where possible? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving	<ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community?

SEA theme	SEA objective	Supporting assessment questions
	accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	<ul style="list-style-type: none"> • Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population? • Improve the availability and accessibility of key local facilities, including health infrastructure? • Encourage and promote social cohesion and active involvement of local people in community activities? • Facilitate green infrastructure enhancements, including improved access to open space? • Maintain or enhance the quality of life of existing residents?
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings? • Conserve and enhance nationally designated heritage assets? • Conserve and enhance buildings and structures of architectural or historical interest, and their settings? • Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the HER? • Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies? • Support access to, interpretation and understanding of the historic evolution and character of the neighbourhood area?
Land, soil, and water resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.	<ul style="list-style-type: none"> • Promote the use of previously developed land wherever possible? • Identify and avoid the development of BMV agricultural land? • Support the minimisation, reuse, and recycling of waste? • Avoid any negative impacts on water quality and support improvements to water quality? • Ensure appropriate drainage and mitigation is delivered alongside proposed development?

SEA theme	SEA objective	Supporting assessment questions
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.	<ul style="list-style-type: none"> • Protect waterbodies from pollution? • Maximise water efficiency and opportunities for water harvesting and/or water recycling? • Avoid any negative impacts on mineral and waste infrastructure? • Improve waste infrastructure in the area? • Protect and/ or enhance the integrity and setting of North Wessex Downs NL? • Protect and / or enhance local landscape character and quality of place? • Conserve and enhance local identity, diversity, and settlement character? • Identify and protect locally important viewpoints which contribute to character and sense of place? • Retain and enhance landscape features that contribute to the neighbourhood area’s rural setting, including trees and hedgerows?
Transportation	Promote sustainable transport use and active travel opportunities and reduce the need to travel.	<ul style="list-style-type: none"> • Support the objectives within the Wiltshire Local Transport Plan to encourage the use of more sustainable transport modes? • Encourage a shift to more sustainable forms of travel and enable sustainable transport infrastructure enhancements? • Improve local connectivity and pedestrian and cyclist movement? • Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area? • Reduce the impact of the transport sector on climate change? • Improve road safety and reduce pollution from vehicles?