



Consultation on the Hungerford Neighbourhood Development Plan (Regulation 16 Consultation)

Representation Form

Ref:

(For official use only)

Please complete online or return this form to:	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy Team, Development and Housing, West Berkshire Council, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	11:59pm on Friday 23 May 2025

This form has three parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make
- Part C - Notification of progress of the Hungerford Neighbourhood Development Plan

PART A: Your Details

Please note the following:

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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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

	Your details	Agent's details (if applicable)
Title:	Mr	
First Name:*	Anthony	
Last Name:*	Amos	
Job title (where relevant):		
Organisation (where relevant):		
Address* Please include postcode:	<div style="background-color: black; width: 150px; height: 40px;"></div>	
Email address:*	<div style="background-color: black; width: 200px; height: 20px;"></div>	
Telephone number:	<div style="background-color: black; width: 100px; height: 20px;"></div>	

Part B – Your Representation***Please use a separate sheet for each representation***

Your name or organisation <i>(and client if you are an agent)</i> :	Anthony Amos
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Please indicate which part of the consultation documents that this representation relates to:

Policy:	Hung 13- Land North of Cottrell Close
Section/paragraph:	Page 66
Appendix:	

Comments

I write to submit a **formal objection**, in the strongest possible terms, to the proposed development on the site designated HUN 13. This objection is submitted on the basis of multiple material planning considerations, each of which gives rise to legitimate concern and, collectively, render the site unsuitable for the proposed development. The objection is structured under the following heads:

1. Ground Stability and Risk of Landslip

The topography of the proposed development site presents a clear and material risk relating to land stability. The site sits on a marked incline running on a north-south axis through Cottrell Close. There is compelling evidence that the existing road surface has already been subject to ground movement, including multiple reparations to both the roadway and subsurface utility infrastructure.

Of particular concern is the presence of two retaining walls situated directly to the rear of residential properties numbered 28–32. These structures were erected by the original developer and were not, to the best of our knowledge, designed or engineered with any intention to accommodate additional load-bearing structures at a higher elevation.

In accordance with applicable building control regulations and best practice in geotechnical safety, any proposed development at this location **must be preceded by a full and independent risk assessment**, including but not limited to:

- A geotechnical survey assessing slope stability;
- The potential impact of both construction-phase and long-term vehicular traffic;
- The structural integrity of the existing retaining walls in light of the proposed works.

No approval should be considered in the absence of such a report, and any failure to commission and act upon this analysis may, in our view, constitute a serious dereliction of duty by the planning authority.

2. Inadequate Foul Water and Surface Water Infrastructure

It is a matter of public record that the existing sewerage and drainage infrastructure serving Cottrell Close is **not fit for purpose**. Over the past 18 months, residents at the lower end of the Close have experienced repeated incidents of garden flooding caused by the ingress of sewage during periods

of high rainfall. This constitutes not only a planning concern but also a potential environmental health hazard.

We would draw your attention to **Planning Application 09/02450/OUTMAJ**, in relation to which **Thames Water explicitly identified a lack of capacity** in the wastewater infrastructure. It is therefore incumbent upon the applicant to demonstrate, to the satisfaction of the statutory undertakers and the planning authority, that any future development will be supported by:

- A full upgrade of the foul and surface water systems for the entire Close;
- Confirmation from the relevant water authority that post-development flows will not exceed capacity;
- A plan for long-term maintenance and resilience.

Failure to impose such requirements would, in our submission, be contrary to both national planning guidance and the precautionary principle underpinning infrastructure risk management.

3. Proximity to Strategic Fuel Infrastructure (GPSS)

The Government Pipeline and Storage System (GPSS) intersects the southern boundary of Cottrell Close. This is a nationally significant infrastructure asset, and any development in its vicinity must be approached with the utmost caution.

The cumulative stress on local road surfaces from construction-related traffic poses a **non-trivial risk** to the integrity of the GPSS pipeline, particularly given the already compromised condition of the roads in question. A rupture or leak from this pipeline could have catastrophic environmental and financial consequences, and would likely trigger multi-agency emergency response procedures.

It is imperative that a **formal consultation with the GPSS authorities and relevant regulatory bodies** be conducted as part of this planning process. In the absence of written assurances confirming that the development poses no threat to the integrity of the pipeline.

4. Power Supply Constraints

Cottrell Close is **not connected to the main town electrical grid**; instead, it is served by a rural distribution circuit prone to recurrent outages. Additional load from further housing will exacerbate these vulnerabilities, impacting both existing and future residents.

It is submitted that **no development should proceed** without a plan for:

- Integrating the Close into the main power supply.
- Upgrading the electrical infrastructure to ensure resilience.

5. Inadequate Road Access

The proposed access road is manifestly insufficient to accommodate two-way traffic, particularly that generated during the construction phase.

6. Proximity to Cemetery and Inappropriate Site Context

The proposed development site is **immediately adjacent to an existing cemetery**, which raises serious concerns regarding the appropriateness and sensitivity of residential development in this location.

From a planning perspective, the cemetery:

- Limits the aesthetic and amenity value of the site;
- Raises ethical concerns about noise, access, and privacy intrusion for those visiting graves;
- Undermines the suitability of the location for family housing, both practically and sentimentally.

This proximity diminishes the desirability of the site and reinforces its inappropriateness for further residential intensification.

7. Cost-Effectiveness and Public Value

Finally, it is important to note that the cumulative infrastructure deficiencies — relating to drainage, power, road access, and land stability — will **necessitate substantial public expenditure** to render the site viable.

In contrast, alternative sites such as that on Salisbury Road are already supported by modern infrastructure and are capable of accommodating a higher density of dwellings with **far fewer public costs**.

In an era of constrained public finances, it is reasonable to expect that the Council will act in the interest of fiscal responsibility and **prioritise development on cost-effective, infrastructure-ready sites**.

Conclusion

For the reasons stated above, I respectfully submit that the HUN 13 site is unsuitable for development in its current state. Any approval would be premature in the absence of:

- Independent geotechnical and infrastructure assessments
- Confirmed mitigation strategies
- Utility upgrades
- Proper consultation with statutory bodies
- Cost effectiveness analysis

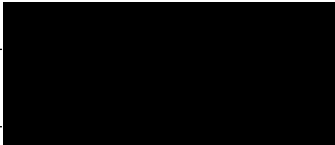
Accordingly, I urge the Planning Authority to **refuse the application** and to consider more viable alternatives that better serve the public interest.

PART C – Notification of progress of the Hungerford NDP

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

Please tick all that apply

Publication of the Examiners report / Decision to progress to referendum	Yes
Decision to adopt the Hungerford NDP	Yes

Signature	Anthony Amos		Date	20 th May 2025
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Your completed representations must be received by the Council by 11:59pm on Friday 23 May 2025.