



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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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:*		MARK
Last Name:*		PETTITT
Job title (where relevant):		ASSOCIATE
Organisation (where relevant):	DENFORD PARK PASTURES EAST LTD	FOWLER ARCHITECTURE & PLANNING LTD
Address* Please include postcode:	C/O AGENT	[REDACTED]
Email address:*		[REDACTED]
Telephone number:		[REDACTED]

*Mandatory field

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> :	MR. MARK PETTITT FOWLER ARCHITECTURE & PLANNING LTD
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Please indicate which part of the consultation documents that this representation relates to:

Policy:	PLEASE REFER TO ENCLOSED LETTER
Section/paragraph:	PLEASE REFER TO ENCLOSED LETTER
Appendix:	PLEASE REFER TO ENCLOSED LETTER

Comments

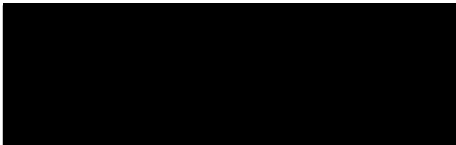
PLEASE REFER TO ENCLOSED LETTER

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	✓
Decision to adopt the Hungerford NDP	✓

Signature		Date	16TH MAY 2025
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Your completed representations must be received by the Council by 11:59pm on Friday 23 May 2025.

Our Ref: MP/200122

16th May 2025

Planning Policy Team
Development and Housing
West Berkshire Council
Council Offices,
Market Street
Newbury
RG14 5LD



BY EMAIL: planningpolicy@westberks.gov.uk

Dear Sir/Madam,

HUNGERFORD NEIGHBOURHOOD PLAN (REGULATION 16 CONSULTATION)

Representations on behalf of Denford Park Pastures East Ltd

Fowler Architecture & Planning Ltd have been instructed by Denford Park Pastures East Ltd to submit representations to West Berkshire Council in respect of the current Regulation 16 Consultation of the Hungerford Neighbourhood Plan.

Thank you for the opportunity to comment.

Introduction

Our client is the freehold owner of 'Follydog Field', which is referred to in the West Berkshire HELAA and in the Hungerford Neighbourhood Plan Site Assessment Report (HNPSAR) as 'HUN15'.

The site has been promoted throughout the Neighbourhood Development Plan (NDP) process as one that is suitable and available for delivering the full housing need for Hungerford, and the summary findings of the HELAA Assessment found HUN15 to be 'Potentially developable in part', and that the site should proceed to Stage 2.

Indeed, our client's land is one of the four sites identified as having potential for allocation in July/August 2021 – as noted at paragraph 1.13 of the NDP Consultation Statement (October 2024).

It is set against this backdrop that our client continues to **strongly object** to the allocation of both 'Land at Smitham Bridge Road' (Policy HUNG12) and 'Land at Cottrell Close' (Policy HUNG 13).

Policy HUNG12 – Land at Smitham Bridge Road

As per our representations at Regulation 14 stage, our Client continues to object to the proposed allocation of land at Smitham Bridge Road for the following reasons:

- the site would only deliver a proportion of the 55 dwelling requirement for Hungerford over the Plan Period;
- the West Berkshire Density Pattern Book advises a density of 20dph for edge of settlement sites such as this. This would equate to 42 dwellings on the site – so not the 44 which is outlined in the policy text. Whilst it is recognised that the policy states ‘approximately’, there is a danger that the 55 dwelling requirement for Hungerford may not be deliverable across the Plan period. To avoid this, the Plan should allocate additional land for housing – the starting point being our Client’s land at Folly Dog Field, the merits of which have been stated numerous times under previous consultation responses;
- the site has an adverse planning history associated with it, which clearly compromises the merits of including the site as an allocation in the Neighbourhood Plan. Previous Application No. 82/18346/ADD sought full planning permission for ‘light industrial’. This was refused in January 1983 for the following reasons:

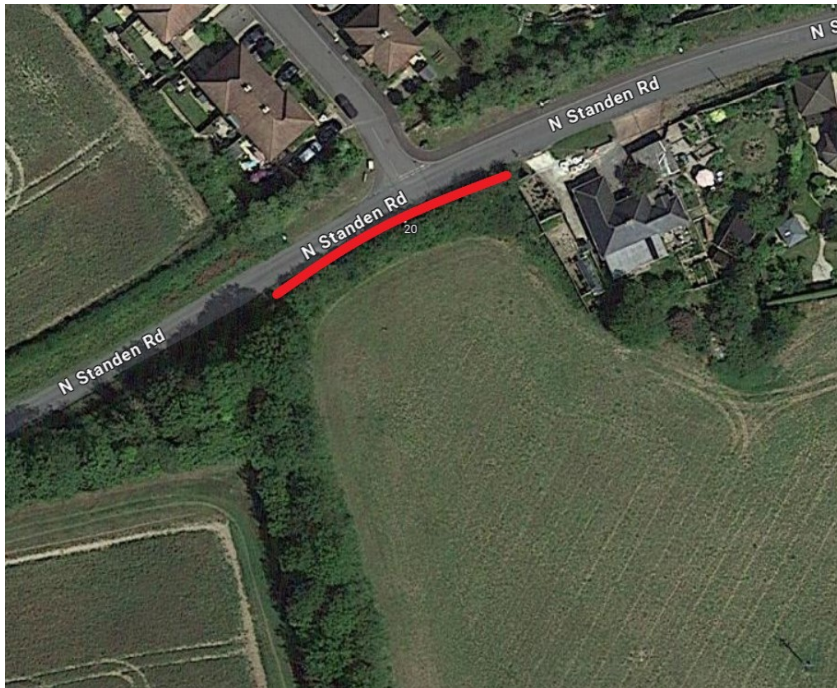
1. 18.02
The proposal is contrary to the policies of the West Berkshire Structure Plan which are to the effect that small scale development on the fringes of the built-up area of Newbury and Thatcham and in all other settlements should be infilling, rounding-off or redevelopment, should be appropriate to the physical, social and visual character and structure of the settlement should conform with other policies of the Structure Plan. The proposal is not of this nature.
2. 18.06
The site lies within the North Wessex Downs Area of Outstanding Natural Beauty for which the policies contained in the West Berkshire Structure Plan are that the overriding need is to maintain and enhance the natural beauty of the area. The proposed development would prejudice these policies.
3. 38.01
The proposal is contrary to the policies contained in the West Berkshire Structure Plan relating to industry or industrially related uses in rural areas, which are to the effect that small- scale proposals appropriate to a rural area, which bring local benefits without harming the environment, will receive favourable consideration. The proposal is not, however, of this nature.
4. The site lies within an area of the Hungerford Town Plan where safeguarding the high landscape quality is of high priority, and where non-agricultural development will not be regarded favourably or permitted on, inter alia, agricultural grounds.
5. 18.10
The proposal involves the spread of a loose scatter of development onto land within a rural area. The form of development proposed would have an adverse effect on the ~~character and amenities of the area and would result in the inefficient use of land~~ capable of agricultural use.
6. The distributor road system is substandard and the industrial traffic which would be generated by this proposal would adversely affect the flow and safety of traffic.
7. The application site does not have sufficient highway frontage land to provide adequate sight lines.

Subsequent to this, an application (Ref. 91/39688/ADD) was refused in the early 1990s for the ‘construction of 18 and 9 hole golf courses clubhouse greenkeepers stores and road access’. The reasons for refusal are unknown, however clearly the site is not a location where the Council have accepted development in the past;

- The eastern part of the site falls within flood zones 2 and 3, and is also shown to be at risk of surface and ground water flooding. The National Planning Policy Framework makes it clear that development should not be allocated if there are

reasonably available sites appropriate for the development in areas with a lower risk of flooding. HUN15 is one such site, that is both available and more appropriate;

- Impact on the users of the PROW. Public footpath HUNG/46/1 cuts through the eastern part of the site, and it is difficult to see how the introduction of at least 44 dwellings will not have an impact on people's enjoyment of the countryside. Indeed, there are currently far reaching views across the site, which would be severely compromised by the introduction of the quantum of development suggested in the policy;
- North Standen Road is recognised as a gateway into the Town, under Policy HUNG3 of the Draft Neighbourhood Plan. We support this. The said Policy notes that there should be gradual transition between the rural countryside and the urban settlement. It is difficult to understand how the introduction of at least 44 dwellings will achieve a gradual transition – particularly given the constraints of the PROW and flood zones 2 and 3 in the east of the site;
- it is unclear how appropriate access will be achieved. The only part of the site where access may be possible is on the frontage shown in red below.



(Source: www.google.co.uk/maps)

This would clearly involve the removal of a large section of hedgerow, and even then it is not clear whether appropriate sight lines can be achieved in both directions. The frontage shown above, only just falls within the 30mph zone, so it is likely that splays will need to exceed 2.4m x 43m. It is also worth noting that one of the reasons for refusal on the 1983 application related to the lack of highway frontage to provide the necessary visibility splays. North Standen Road is a narrow road, which is unlikely to be able to accommodate the additional traffic generated by 44 new dwellings;

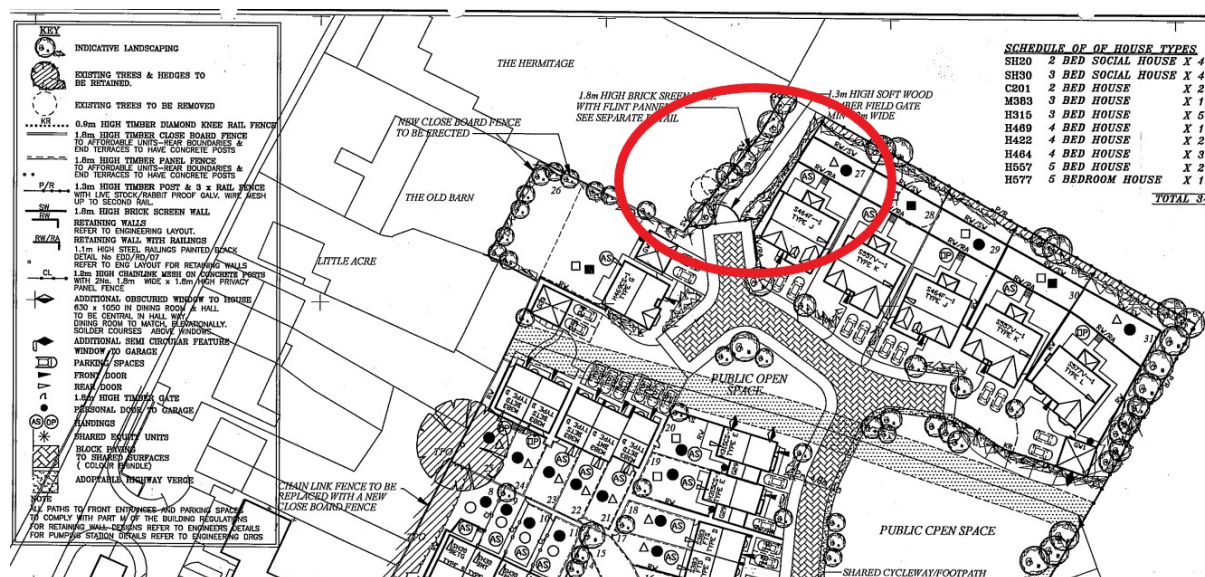
- the site is not a particularly sustainable location, having regard to Neighbourhood Plan objectives G & H. The site is some distance from the nearest bus stop and is a generous distance away from the Town centre and the train station; and,
- impact of the development on the National Landscape. As with the rest of Hungerford, the HUNG12 site falls entirely within the National Landscape. It is difficult to see how a development of (at least) 44 dwellings, close to a gateway into the Town and with a public footpath running right through will not have a harmful impact on the National Landscape – particularly when considering the previously refused applications on the site. It is also worth noting that the Strategic Environmental Assessment for the Hungerford Neighbourhood Plan states 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”* (Our Emphasis). This is hardly a ringing endorsement for the site’s inclusion as a housing allocation.

Policy HUNG 13 – Land at Cottrell Close

Our Client objects to the proposed allocation of land at Cottrell Close for the following reasons:

- unlike all the other potential housing sites put forward, the suitability of the allocated site (Ref. HUN20) has not been assessed through the West Berkshire Council Strategic Housing and Economic Availability Assessment;
- the site would only deliver a small proportion of the 55 dwelling requirement for Hungerford over the Plan Period;
- the West Berkshire Density Pattern Book advises a density of 20dph for edge of settlement sites such as this. This would equate to 11 dwellings on the site – so not the 12 which is outlined in the policy text. Whilst it is recognised that the policy states ‘approximately’, there is a danger that the 55 dwelling requirement for Hungerford may not be deliverable across the Plan period. To avoid this, the Plan should allocate additional land for housing – the starting point being our Client’s land at Folly Dog Field, the merits of which have been stated numerous times under previous consultation responses;
- due to the size of the site, there is limited scope to incorporate any community uses, such as allotment or public open space;
- adverse impact on designated heritage assets, in particular the Conservation Area (which is very close to the site) and the Grade II listed ‘The Hermitage’, positioned a short distance to the west;
- it is unclear how appropriate access will be achieved. The image below is an extract from the Planning Layout Plan submitted as part of Application No. 00/01335/FUL. This clearly shows that Cottrell Close is just a block paved shared surface, and that the wedge of land in question is a very narrow strip of land at the end of a turning head. It is very difficult to see how appropriate access onto HUNG13 will be possible, and there is nothing in the Draft Neighbourhood Plan that suggest that this

has been established. It is also not clear who owns the strip of land between Cottrell Close and the allocation, and whether it is the same party(s) or not; and,



(Source: www.westberks.gov.uk)

- impact of the development on the National Landscape. As with the rest of Hungerford, HUNG13 falls entirely within the National Landscape. One of the concerns raised in respect of our Client's land at HUN15, was the impact of development when viewed from Hungerford Common to the south. Indeed, it was noted that the land adjacent to the Garden Centre up to level with the line of Cottrell Close may be acceptable. HUNG13 extends **beyond** the line of Cottrell Close, on rising land. Indeed, the Strategic Environmental Assessment for the Hungerford Neighbourhood Plan states that *"The site is elevated in terms of topography, and is visible from Hungerford Common, also with important views of the skyline"*. In light of this, it is difficult to understand why the site is considered acceptable in landscape terms as an allocation.

Other Points and Observations

- **Paragraph 2.9** – this makes reference to housing growth between 2011 and 2021. However, the Plan period goes up to 2041, so it should take into account the projected housing growth to 2041 – bearing in mind Objective A of the Neighbourhood Plan;
- **Paragraph 4.1** – the Neighbourhood Plan makes reference to the Hungerford Housing Needs Assessment. This dates back to 2019, and is therefore considered out of date. A new housing needs assessment should be produced to inform the Neighbourhood Plan, rather than relying on an assessment that is some 6 years old and relies on out of date evidence.
- **Paragraph 4.3** – this paragraph makes reference to the ageing population in Hungerford. HUNG12 is some distance away from the nearest bus stop, the town centre and the train station – from a locational point of view it is difficult to see how this site will cater for an ageing population;

- **Paragraph 8.6** – the correct paragraph from the NPPF is 107, not 106;
- **Policy HUNG1 (Housing Mix)** – our Client supports the inclusion of this policy, but opines that the recommended split should be based on an up-to-date housing needs assessment, and not one that dates back to 2019;
- **Policy HUNG2 (Design & Character)** – our Client supports the inclusion of this policy;
- **Policy HUNG3 (Gateways into and out of Hungerford Town)** – our Client supports the inclusion of this policy, and in particular the inclusion of the North Standen Road Gateway. Gateway A, which relates to Bath Road, is shown positioned adjacent to land that our Client owns. If HUN15 were to be allocated within the Neighbourhood Plan, then we are committed to ensuring a gradual transition between the rural countryside and the urban settlement – as per the layout shown below; and,
- **Policy HUNG11 (Wildlife-Friendly Development)** - our Client supports the inclusion of this policy.

Site Allocation Selection Process

In November 2023, we submitted comments in respect of the site allocation selection process, following the informal housing site consultation that took place.

We never received a response to the concerns that we raised, and therefore I set these out again below:

The HNPSAR provides a summary of the 8 sites that passed Stage 1. For HUN15 the report sets out a 'negative' response, stating that:

The site would expand the small village of Upper Eddington, rather than Hungerford town. It has a limited relationship with the settlement boundary. Its location separate from Hungerford town and relative distance from many key services and facilities may mean it is less attractive to older people. This distance and accessibility also means that more trips will be taken by car. Development of the whole site would have a detrimental impact on the AONB and the Kennet and Lambourn Floodplain SAC and River Kennet SSSI would be vulnerable to both direct impacts from construction and changes to hydrology. As such, development of the whole site would be unsustainable. Limited development of part of the site adjacent to the Garden Centre up to level with the line of Cottrell Close may be acceptable, however the community benefits that the scale of such a site could deliver would be more limited.

Immediately adjacent to HUN15, is Site HUN20 (North of Cottrell Close), which is a site that presumably came forward during the course of the second Call for Sites exercise. The Stage 2 summary to that site is 'positive', stating that:

The site would expand the small village of Upper Eddington, rather than Hungerford town. However, it is adjacent to the settlement boundary. Its location separate from Hungerford town and relative distance from many key services and facilities may mean it is less attractive to older people. This distance and accessibility also means that more trips will be taken by car. The site does encroach into the open countryside although careful design should ensure it does not have an impact on the AONB. Provided that any harm to the adjacent listed building is less than substantial, there are no other impacts and the site would make a clear contribution towards meeting Hungerford's housing needs.

It is still not clear from the HNPSAR or the SEA why HUN20 is considered positively, and yet HUN15 is considered negatively.

The summary to HUN15 in the HNPSAR makes the following references:

- ***The site would expand the small village of Eddington, rather than Hungerford Town*** – these comments are equally applicable to HUN20, and are noted as such in the summary to this site.

The summary to Site HUN20 also notes that the site lies adjacent to the Settlement Policy Boundary. The same applies to Site HUN15, it too stands adjacent to the Settlement Policy Boundary, but for some reason the summary notes that the site has a limited relationship to this designation. This is clearly not the case;

- ***Its location separate from Hungerford Town and relative distance from many key services and facilities may mean it is less attractive to older people*** - these comments are equally applicable to HUN20, and are noted as such in the summary to this site;
- ***This distance and accessibility also means that more trips will be taken by car*** - these comments are equally applicable to HUN20, and are noted as such in the summary to this site;
- ***Development of the whole site would have detrimental impact on the AONB and the Kennet and Lambourn Floodplain SAC and River Kennet SSSI would be vulnerable to both direct impacts from construction and changes to hydrology*** – I think it is important to note at this stage that our client has outlined a willingness to reduce the size of the site to take into account these concerns, and you will be aware that a reduced scheme was presented to the Neighbourhood Plan Steering Group at a virtual meeting held on the 10th June 2021 (see Site Plan extract below). Clearly the Site Assessment Report is considering the wider Folly Dog Field site, when actually the report should be considering the smaller part of the site, which has been recognised previously as being ‘potentially developable’, and can deliver the full 55 dwelling requirement.



55 dwelling scheme – presented to the Steering Group back in June 2021.

- ***As such, development of the whole site would be unsustainable*** – it is not clear why this applies to HUN15, but not HUN20; and,
- ***Limited development of part of the site adjacent to the Garden Centre up to level with the line of Cottrell Close may be acceptable, however the community benefits that the scale of such a site could deliver would be more limited*** – the Site Plan extract above shows a scheme that is adjacent to the Garden Centre up to the level with the line of Cottrell Close. This would deliver the full housing requirement of 55 dwellings for Hungerford. The community benefits of a scheme of this nature would be *greater* than both HUN7 (Smitham Bridge Road) and HUN20. The latter in particular will only deliver affordable housing and financial contributions. The HUN15 site will be able to deliver both of these, as well as the potential for public open space, allotments, ecological benefits etc.

In summary, it is unclear why HUN15 was considered negatively in the HNPSAR and SEA, when HUN20 was considered positively. Our client's land has the potential to deliver the full 55 dwelling housing requirements along with community benefits, and we contend that the reduced area for Folly Dog Field site should have been considered as part of the Stage 2 Assessment, rather than the wider field. This is important, because the reduction in the site area is in direct response to concerns expressed previously by both West Berkshire Council and the Steering Group regarding development of the field as a whole. It is clear from the Stage 2 summary of HUN15, that limited development of the site (as shown on the Site Plan extract above) may be acceptable. We believe that it is.

When undertaking an assessment of HUN15 (as reduced) against the 9 objectives of the Hungerford Neighbourhood Plan, it is clear that the site performs positively.

Closing Remarks

Our client continues to contend that Site HUN15 should be considered for allocation in the Hungerford Neighbourhood Plan, to deliver the full 55 dwelling requirement.

It is both suitable and available, and can be delivered over the Plan period. Furthermore, the site would be accessed from the A4, which in turn would avoid further traffic generation along Hungerford High Street – which I understand has been an issue raised on Hungerford Town Council Facebook page, in respect of recent housing developments in the town.

The allocation of HUN 7 and HUN 20 is strongly opposed by our client.

I look forward to hearing from you.

Yours Sincerely,

Mark Pettitt BA(Hons) MRTPI

Associate

FOWLER ARCHITECTURE AND PLANNING

Encs

cc: Client