



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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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:*	Benson	
Last Name:*	Pocock	
Job title (where relevant):	Sustainability Design Consultant	
Organisation (where relevant):		
Address* Please include postcode:		
Email address:*		
Telephone number:		

*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>):	Benson Pocock
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Please indicate which part of the consultation documents that this representation relates to:

Policy:	Hungerford Neighbourhood Development Plan (Regulation 16 Consultation)
Section/paragraph:	Section 10 – Land at Smitham Bridge Road
Appendix:	

Comments

Dear Councillors,

Objection to the Proposed Development of 44 Homes on Smitham Bridge Road (Policy HUNG12)

As a resident of Hungerford and someone who's committed to the town's sustainable growth, I write to object to the proposed allocation and development of 44 new dwellings at Smitham Bridge Road, as outlined under Policy HUNG12 in the Hungerford Neighbourhood Plan.

This proposal conflicts with several of the Plan's own objectives, has been met with public opposition, and fails to represent the most appropriate or sustainable location for new housing. I also wish to present a constructive alternative — the Salisbury Road site — as a more suitable location for this level of development.

1. Community Opposition and Consultation Feedback

The community's opposition to the Smitham Bridge Road development is clearly recorded in:

- **Initial Community Consultation (2023):** Residents raised significant objections regarding traffic, rural character, and the loss of green space.
- **Regulation 14 Consultation (2024):** The site drew widespread criticism, including from statutory consultees, for traffic and landscape concerns and a perceived failure to address local housing need.

It seems that previous objections have been ignored to date and it's clear that proceeding with development on Smitham Bridge Road would disregard the evidence-based concerns raised during a robust consultation process.

2. Environmental Harm and Gateway Disruption

The proposed site lies close to **Freeman's Marsh**, a **Site of Special Scientific Interest (SSSI)**, and functions as a vital wildlife area. Development here risks disturbing habitats and fragmenting ecologically sensitive zones. Specifically, the area around Smitham Bridge Road is a corridor for birds to access the marsh, to nest & source food. For example, the field is home to a variety of **bird species**, including:

- **Skylarks**, a Red-Listed species under conservation concern, which rely on open grassland for nesting.

- **Lapwings**, which are ground-nesting birds vulnerable to development disturbance.
- **Barn Owls**, which forage in open fields and are sensitive to artificial lighting and increased activity.
- **Swifts**, Swallows and House Martins, which depend on uninterrupted flight paths and nesting access to existing rural structures.
- **Yellowhammers**, another red-listed species that are frequently seen in the proposed development site.
- **Whitethroat Warbler**, an Amber-listed bird that is uncommon and actively avoids urban areas.

Building 44 houses in this area will destroy nesting habitats, introduce light and noise pollution, and significantly disrupt feeding and migration patterns. This directly conflicts with Policy HUNG11 (Wildlife-Friendly Development), as well as Objective S, which mandates biodiversity protection and enhancement.

No adequate mitigation strategy has been proposed, and the development **represents a serious ecological loss** to Hungerford.

Additionally, the proposed site sits at a rural gateway to Hungerford. Policy HUNG3 calls for a gradual rural-to-urban transition. The Smitham Bridge development would destroy this gateway character, replacing open countryside with a dense housing estate — violating the Plan's Objectives O and P and undermining the town's distinctive rural setting within the North Wessex Downs National Landscape.

The argument that this is a frequented access into and out of Hungerford is false and frankly absurd. It's evident that the majority of traffic will go into the town centre, via Church Street, for access to larger roads such as the A4, M4 and A338.

3. Traffic and Infrastructure Constraints

Smitham Bridge Road is **already under pressure**, with narrow carriageways, no continuous footpath on parts of the route, and poor pedestrian access to town. Development would **severely worsen these problems**, contravening Objectives F and G, which promote safe, walkable environments and minimal traffic disruption. This would require further investment of public money to improve the infrastructure when other proposed sites would not require it.

4. Mismatch with Local Housing Needs

The town's **Housing Needs Assessment** shows a demand for smaller, more affordable housing and bungalows for older residents — not generic suburban estates. Unless this scheme can prove it delivers this mix (and there is no such evidence currently), it would worsen, not solve, Hungerford's housing challenge.

Moreover, the site is greenfield and **contradicts Objective A**, which emphasises prioritising previously developed land and minimising countryside encroachment.

5. The Case for Developing Salisbury Road Instead

The **Salisbury Road site** — a more suitable alternative — has several compelling advantages:

- **Existing Infrastructure:** It already has direct road access onto the A338 and does not rely on substandard minor roads.
- **Better Connectivity:** The site is closer to local amenities, schools, and public transport routes, aligning with Objective H to encourage public transport usage.
- **Less Visual and Environmental Harm:** Salisbury Road is already partially developed and lacks

the gateway sensitivity of Smitham Bridge. Development here would not compromise a key entrance into Hungerford or intrude into highly valued countryside.

- **Community Support:** Unlike Smitham Bridge, which faced strong public opposition, Salisbury Road attracted comparatively little negative feedback in consultation responses.

Indeed, the Neighbourhood Plan itself identifies the **Salisbury Road area as a previously supported site** in earlier Local Plan consultations, yet it has been omitted without adequate explanation. In planning terms, this omission appears inconsistent with the Plan's stated objectives and evidence base.

Conclusion

For all the reasons above — from environmental harm and infrastructure overload to community opposition and poor site suitability — **I urge the Council to remove the Smitham Bridge Road site from the Neighbourhood Plan.** Instead, I recommend **reconsideration of Salisbury Road**, a site better aligned with planning policy, local sentiment, and sustainable growth principles.

Below is supporting evidence – a comparison of each site against important criteria which provides further reasoning on why Salisbury Road is a much more suitable site:

Criteria	Smitham Bridge Road	Salisbury Road
Access & Transport	Narrow road, limited footpaths, poor connectivity to town centre.	Direct access to A338, better road network and closer to amenities.
Traffic Impact	Would significantly increase congestion on minor roads.	Better road capacity and safer vehicular movement.
Public Consultation Feedback	Strong opposition: traffic, rural character, infrastructure strain.	Limited objection, historically more acceptable to residents.
Gateway Character Impact	Damages key rural gateway to Hungerford (Policy HUNG3).	Minimal visual harm; not on a gateway approach.
Landscape Sensitivity	Highly sensitive: North Wessex Downs National Landscape (AONB).	Less prominent visual exposure and landscape conflict.
Proximity to Services	Further from schools, shops, GP surgery, and train station.	Closer proximity to existing services and public transport.
Footpath/Cycle Access	Poor connectivity, safety issues for pedestrians/cyclists.	Easier to integrate with walking/cycling routes (Policy HUNG6).
Flood Risk/Environmental Impact	Close to Freeman's Marsh SSSI; increased runoff risk.	Less ecologically sensitive area; fewer environmental constraints.
Alignment with HNP Objectives	Conflicts with Objectives A, F, O, P, and G.	Better supports sustainable growth principles in Objectives A, G, H.
Infrastructure Pressure	Will overburden schools, GP, and rail station parking.	Can better share load with existing planned growth.
Availability/History	Greenfield site, previously controversial.	Identified in earlier Local Plan discussions; more community support.

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	B Pocock	Date	07/05/2025
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Your completed representations must be received by the Council by 11:59pm on Friday 23 May 2025.