



## 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: <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>
	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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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:		
First Name:*		James
Last Name:*		Iles
Job title (where relevant):		Director
Organisation (where relevant):	Rootes Trustees	Pro Vision
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> ):	Pro Vision on behalf of the Rootes Trustees.
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**Please indicate which part of the consultation documents that this representation relates to:**

Policy:	HUNG12 Land at Smitham Bridge Road
Section/paragraph:	
Appendix:	

**Comments**

We reiterate our concerns expressed at Regulation 14 stage regarding the site selection process and concerns that public benefits that have influenced the process will not be secured and therefore the process is flawed.

It is evident from the Consultation Statement published at Regulation 16 stage that the allocation of Land at Smitham Bridge Road (Policy HUNG12) is justified by the notional benefit of securing for the Town Council the existing Marsh Lane allotments. Please refer to the highlighted copy of the Statement appended to this submission.

Policy HUNG12 is silent on the transfer of the allotments (both in the wording of the policy and its supporting text) and there is no other policy in the Plan regarding the future of these allotments.

It is also evident from the Consultation Statement that the Town Council has received assurances by way of a Solicitors' letter from the landowner/promoter of the HUNG12 allocation site, that a planning application for its development will include a legal agreement or land transfer for the Marsh Lane allotments.

This arrangement is flawed for the following reasons.

In the absence of any explicit link to the transfer of the allotments in policy HUNG12, this means that there is no legal requirement for an application to include the allotments land. (This has been noted by some of the resident comments).

An application for development of the site, provided it accords with the terms of the policy, should be approved whether or not the allotments were transferred. In that scenario, there would be no recourse for the Town Council to secure the allotments.

The site may be sold to others who would have no obligation or ability to deliver on this notional commitment.

The public benefit of securing the allotments is therefore notional and the Regulation 16 Plan risks failing to deliver this benefit.

The strategy described in the Consultation Statement to secure the allotments at the planning application stage is flawed. A legal agreement with the application would need to meet the Community Infrastructure Levy (Regulation 122) tests. These tests are cited in the National Planning

**Policy Framework (NPPF) 2024 [paragraph 58]:**

*“Planning obligations must only be sought where they meet all of the following tests:*

- a) Necessary to make the development acceptable in planning terms;*
- b) Directly related to the development; and*
- c) Fairly and reasonably related in scale and kind to the development”.*

Without a policy requirement to transfer the allotments, a planning application that included the transfer would fail all three of these tests (but only one needs to fail for the obligation to be unlawful).

There is therefore doubt that the Basic Conditions have been satisfied, namely ‘Condition a’ (regard to national policy and guidance). Even if this Basic Condition is deemed to have been met, the Plan is contributing to a procedural problem by relying on the planning application stage to deliver a public benefit by an unlawful means. The evident risk is that the Smitham Road Bridge Site has been allocated (ahead of alternative, available sites) but the public benefits associated with it have not been secured.

**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

<b>Signature</b>	James Iles, Pro Vision	<b>Date</b>	22 May 2025
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**Your completed representations must be received by the Council by 11:59pm on Friday 23 May 2025.**

# **Hungerford Neighbourhood Plan 2024-2041 Consultation Statement**

**October 2024**

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# 1 CONSULTATION PROCESS

## Introduction

- 1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Hungerford Neighbourhood Plan.
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:
  - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - explain how they were consulted;
  - summarise the main issues and concerns raised by the persons consulted; and
  - describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the Neighbourhood Plan are as a result of considerable interaction and consultation with the community and businesses within the parish. Work has been going on for seven years so far.

## Organisational structure of the Neighbourhood Plan

- 1.4 The HNP is run by a steering committee which is made up of town councillors and members of the public. Each month there is a briefing to the Full Council meeting of the Hungerford Town Council. Since the start of the process in 2018 to today in 2024 the members of the steering committee have changed and the average blend of councillors to general public tends to be about two-thirds councillors and a third other. There has also been at least one member of the Town & Manor, a charitable organisation which manages much of the open space around the town and the town hall. One of the current councillors is both a member of the Town Council and Town & Manor.
- 1.5 The HNP was initially named Hungerford 2036. The terms of reference of the 2036 project can found at this link: [2036 Team terms of reference](#). The Steering Committee as shown on the meeting notes of 5/4/2018 [SG Meeting 5/4/2018](#) had a membership at the start of the project of the following:
  - Town Councillors (8): Keith Knight, John Downe (chair), Martin Crane, Rob Chicken, Richard Hudson, Carolan Farrell, Mark Cusack & Rob Brookman.
  - District Councillor (1): Dennis Benneyworth.
  - Town & Manor (1) Chris Scorey.
  - Other groups / public (3): Tony Drewer-Trump (deputy chair), Chris Greenland & John Whiting.
  - Town Clerk: Claire Barnes.
- 1.6 Over the years the membership has evolved as councillors and other members came and went depending on availability and interest. There has been continuity from Councillor Richard Hudson and Town & Manor representative Chris Scorey, both of whom helped

with the earlier Hungerford Town Plan Refresh of 2013, which has also input to the HNP. The Clerk has also been part of the process throughout and has assisted considerably with progressing actions and meeting notes. The current membership based on a recent meeting notes from early in 2024 [SG Meeting 24 01 2024](#) is as follows:

- Town Councillors (8): Richard Hudson (chair), Keith Carlson, Alistair Fyfe (also Town & Manor), Claire Winsor, James Cole, Gerry Keates.
- District Councillor (1): Denise Gaines.
- Town & Manor (1) Chris Scorey.
- Other groups / public (1): John Ryder.
- Town Clerk: Claire Barnes.

### Activities of the Neighbourhood Plan

1.7 Table 1.1 provides a timeline of the activities undertaken to inform the development of the Neighbourhood Plan.

**Table 1.1: Hungerford Neighbourhood Plan TIMELINE**

Date	Action	Notes
22/01/2018	Meeting in the Town Hall with the public (approx. 60 people) and agreed to proceed with a NP. Then called Hungerford 2036	Presentation about what involved and expectation of a 2-3 year project. Meeting notes: <a href="#">Meeting 22 01 2018</a>
05/04/2018	First meeting of the Neighbourhood Plan Steering Group (SG).	<a href="#">SG Meeting 5/4/2018</a>
09/04/2018	Neighbourhood Area designated by West Berkshire Council, enabling NP being produced by Hungerford Town Council	
July 2018	Public Consultation, that included a meeting at the Town Hall with survey forms. The main purpose was to find out what people like about Hungerford and what are people's main concerns. A broad capture of issues for the town and also progressing on from the Hungerford Town Plan Refresh of 2013.	556 surveys completed
October 2018	Report of July 2018 Consultation to Town Council	High quality survey and helpful analysis <a href="#">July18 Survey analysis</a>
November 2018	Further analysis of July 2018 Consultation to Town Council	Further useful analysis <a href="#">Further July 2018 Survey analysis</a>
January 2019	Vision, Aims and Objectives produced and published: <a href="#">Aims and Objectives</a>	Based on issues raised during the public consultation
February 2019	Call for sites published	
October 2019	Assessment of site criteria published by project team: <a href="#">Site Assessment Criteria</a>	

Date	Action	Notes
December 2019	Housing and Economic Land Availability Assessment (HELAA) published by West Berks Council	
June 2020	Additional sites added to the HELAA and consistent assessment undertaken by West Berks Council	
Jan 2021	HELAA assessment of sites carried out by consultant (Navigus Planning) against HNP objectives.	Plan of these sites is here: <a href="#">Plan of Site Assessments</a>
July & August 2021	Consultation on four potential sites. Web based and in-person exhibition held at the Corn Exchange and Croft Hall	Approx. 220 responses on line
Sept 2021	Engagement at the Croft Hall to ask about the four sites	
March 2022	SG and Town Council struggle to reach consensus on site allocations regards two sites or one site.	
Sept 2022	SG regrouped with action plan to progress the plan. Renamed the Plan Hungerford Neighbourhood Plan, in part as the end year was extended beyond 2036 to 2039 and now 2041.	
Nov 2022	Updated call for sites as 3 years had elapsed since last call	
Jan 2023	Appoint Navigus Planning to assist with progressing plan	
April 2023	First draft text of Neighbourhood Plan completed	
June 2023	New sites assessed by West Berks District Council for consistent assessment	
August 2023	HELAA site assessments completed with Navigus Planning site assessments against Plan objectives	
Nov 2023	Text of HNP all but completed, except for details on the allocations	
Nov 2023	Consultation on preferred site allocations. Online survey consultation held in the Town Hall over 3 days.	
Jan 2024	Draft HNP Plan completed	
Dec 2023-Feb 2024	Strategic Environmental Assessment (SEA) – scoping report (Dec 2023) and final SEA (Feb 2024) produced by AECOM.	<a href="#">SEA Scoping Report Dec 23</a> <a href="#">SEA Report Feb 24</a>
Jan 2024	Habitats Regulations Assessment carried out by AECOM	<a href="#">Habitats Regulations Assessment Jan 24</a>
Feb & Mar 2024	Pre-Submission (Regulation 14) Consultation carried out by HTC	
Aug 2024	Final comments received from West Berks Highways & Drainage Team.	
Sept 2024	HNP updated following the Reg 14 consultation	<a href="#">All responses to reg 14 to NDP.pdf (hungerford-tc.gov.uk)</a>
Nov 2024	Documents submitted to West Berks Council (Regulation 15)	

1.8 There were several types of communication that included:

- Web based on the Hungerford 2036 web site ([2036 web site](#)). This contains much of the information gathered throughout the process The Town Council web site

([HTC HNP web site](#)) has most of the more recent items, such as the Regulation 14 consultation details.

- Press articles to update on progress and alert the community about new consultation events.
- Public exhibitions about the HNP. These were mainly held at the Town Hall.
- Other direct consultations. These included stalls outside the Tesco supermarket in the town centre, at the market and during the annual Victorian extravaganza in December.
- Direct emails to key organisations including the schools, doctors surgery and employers. Also direct to many of the local landowners when there were calls for sites.
- Public meetings. There is an annual town meeting and every year there has either been an HNP stall or presentation on progress of the plan. At the monthly Town Council meeting, which the public is able to attend, there is also an update on the plan for all to discuss.

- 1.9 Evidence of the communication articles, photos of exhibitions and advertising banners are shown on the Hungerford 2036 website in the Reference section (see the 'Communications' tab).

### **Public events and other consultation activities**

- 1.10 There were three main public consultations that input to the Neighbourhood Plan. Throughout, as set out in the term of reference ([2036 Team terms of reference](#)) the process has always endeavoured to be open and transparent.
- 1.11 The first was during the summer of 2018 when there was a huge effort to engage with all the parish and town to find out what the key issues were. There was a web survey ([web survey](#)). The results of the survey are best summarised in two documents which are linked here: [July18 Survey analysis](#) and [Further July 2018 Survey analysis](#). Advertising for these was on the web site, local media (comprising the Penny Post and the Adviser – both community news publications - and the Newbury Weekly News) and a banner on the town hall. There were also posters put up in several locations around the town, including at playgrounds, pubs and schools.
- 1.12 Next came the consultation on the Plan's aims and objectives during winter 2018/19. This was mainly web -based and engaging with key stakeholders who were sent these, e.g. the Town & Manor, schools, employers etc. In practice, there was not a great deal of response, but it was felt important for the community to be able to input to these.
- 1.13 In July and August in 2021 a consultation took place on the four sites identified as having potential for allocation. This was advertised in the usual ways, i.e. press articles, through posters and banners and on the Hungerford 2036 website. There was an exhibition at the town hall and the Croft Hall where there was direct involvement from the community. There was also a web based survey. In total there were about 220 responses from the community.
- 1.14 There was a bit of a gap before the next consultation took place in November 2023 on the site options. A report of consultation was produced which is linked here: [report of consultation Nov 2023](#). This explains the process, which was a combination of web based

engagement, a public exhibition at the town hall and a continuous exhibition at the library. This thorough approach to differentiate between sites was carried out to try and get the most representative views from the community, which was inevitably split depending on location of the development. But a fairly clear conclusion was identified.

- 1.15 When the draft plan was ready this then went out to Pre-Submission (Regulation 14) consultation during February and March 2024. There was an extensive list of statutory and other consultees that were written to and all were urged to respond. A form for responses was included: [Reg14 Consultation Sheet](#). There were posters put up around the town encouraging input and comments ([Reg 14 Poster along with banners, press articles and information on the Hungerford 2036 website](#)). West Berks Council who were busy on their Local Plan Review were unable to fully respond due to Local Plan commitments until after the end of the Regulation 14 process which caused the plan to be delayed.
- 1.16 Throughout the seven-year process, each year in March there is an annual town meeting. This is open to all members of the public and used to be a presentation of what the Town Council has been doing over the last year. This always included an update on the Neighbourhood Plan. Over the last three years the format has changed and the Corn Exchange, which is the main room in the town hall, is open for stall holders to show what they have been doing over the year. Generally 60 to 100 members of the public attend and there are about 20 organisations. The HNP always has a stall showing plans and updates for anyone who would like to know more about its the progress.

### ***Stakeholder consultations***

- 1.17 Throughout the above consultations, a range of stakeholders were involved at every stage. These included several types of stakeholders:
- Residents of the parish: As referred above there were several ways that they were engaged in the process, notably through web consultations, public exhibitions and meetings.
  - Organisations within the parish: Including the Town & Manor, the local schools, the Chamber of Commerce, businesses.
  - Public bodies: Notably West Berks Council as the planning authority for the area.
  - The landowners: Following the two rounds of calls for sites the landowners were kept informed of the assessments, outcome of the consultation and the plan itself.

### **Engaging with hard-to-reach groups**

- 1.18 There were several of these identified and perhaps the main group was the younger population. To try to reach these groups we directly contacted the schools, notably the John O Gaunt Secondary School and Hungerford Primary School. Local sports clubs were also contacted which included the football and rugby clubs. This was mainly done during the 2018 consultation. Direct engagement with the schools helped us to identify additional facilities wanted by young people, such as additional changing facilities at the football club.

### **Strategic Environmental Assessment**

- 1.19 This process was conducted by AECOM. A scoping report was produced first after discussion with the Steering Committee and linked here: [SEA Scoping Report Dec 23](#). This included engagement with the statutory bodies (the Environment Agency, Natural England

and Historic England). This was then used to produce the final SEA report, with a link here: SEA Environmental Report, Feb 2024.

### **Habitats Regulations Assessment**

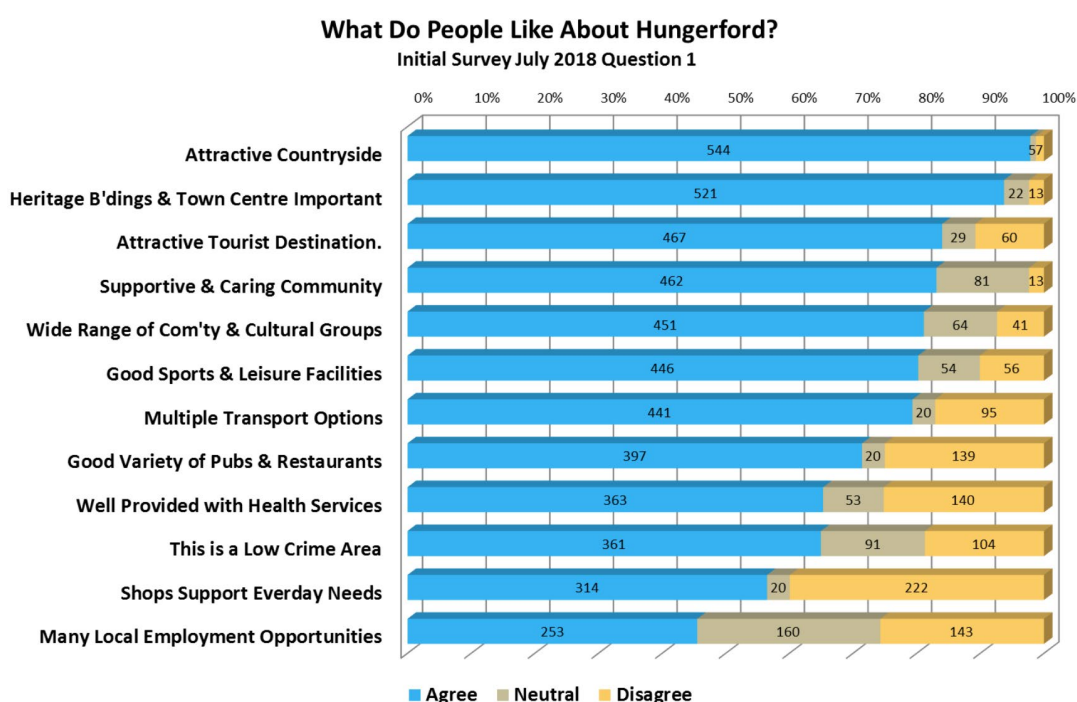
- 1.20 This was also produced by AECOM and is contained here: [Habitats Regulations Assessment Jan 24. It was informed by engagement with Natural England.](#)

## 2 KEY RESPONSES FROM CONSULTATION

- 2.1 There were three main public consultations that input to the Neighbourhood Plan. Throughout, as set out in the term of reference ([2036 Team terms of reference](#)), the process has always endeavoured to be open and transparent.

### Summer 2018: Identifying key issues

- 2.2 The first was during the summer of 2018 when there was a huge effort to engage with all the parish and town to find out what the key issues were. There was a web survey ([web survey](#)). The results of the survey are best summarised in two documents which are linked here: [July18 Survey analysis](#) and [Further July 2018 Survey analysis](#).
- 2.3 The survey identified what people liked about Hungerford:

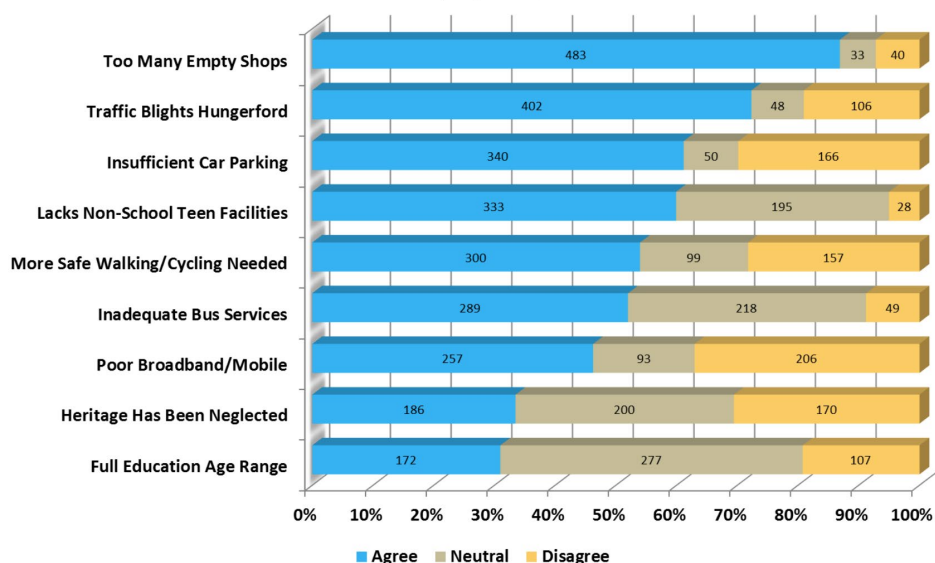


Comments received in a word cloud are shown here.

It also identified what people's concerns are about Hungerford:

### What Are People's Concerns About Hungerford?

Initial Survey July 2018 Question 3



The word cloud clearly shows the key problems focusing on transport with parking, traffic and cars featuring.

- 2.4 This analysis was helpful to provide a sound basis for the gathering of evidence related to these matters that would ultimately form the basis of the plan. These directly input to the initial aims and objectives and themes as set out in the Appendix 1 of the 2018 Survey linked here: [Survey Report No3 to HTC](#).
- 2.5 The 2036 logo was also set up which helped to create a brand identity.



Although later this had to be abandoned as the end dates of the plan moved forward to 2039 and then 2014, as it was necessary to be consistent with the West Berkshire Local Plan.

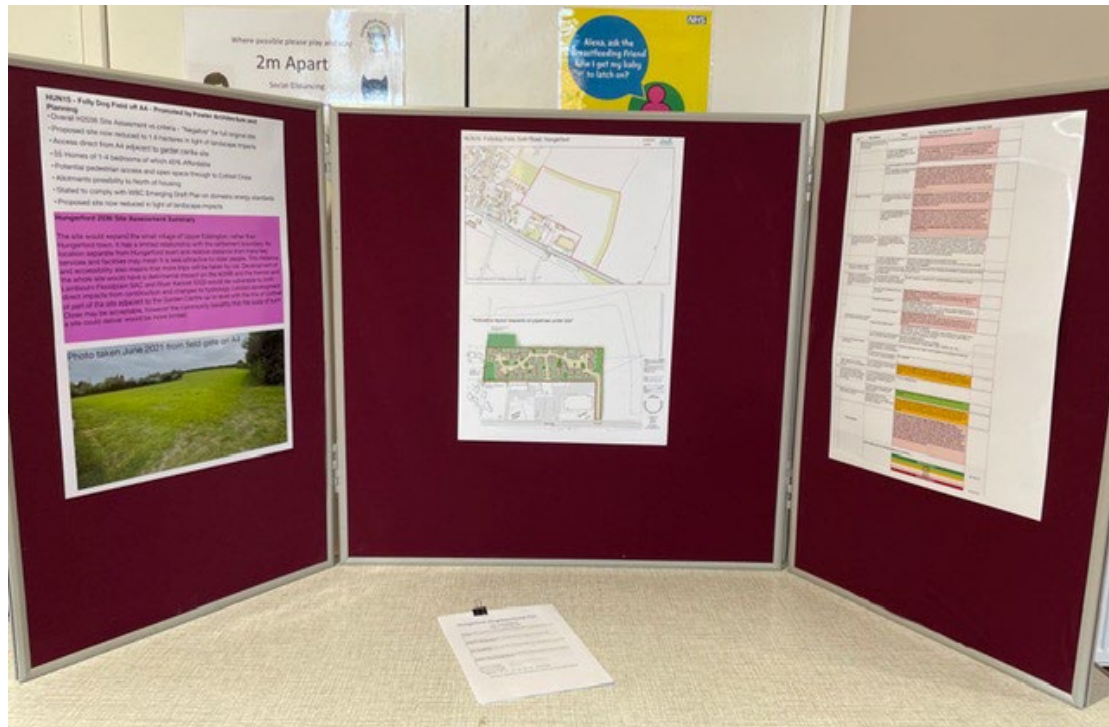
### Winter 2018/19: Identifying aims and objectives

- 2.6 During the winter of 2018/19 there was a consultation on the plan's draft aims and objectives which emerged from the issues identified above. In practice, there was not a great deal of response, but it was felt important for the community to be able to input to these. The resulting aims and objectives can be found here: [aims and objectives](#).

### Summer 2021: Initial sites consultation

- 2.7 During July and August 2021 a consultation took place on the four sites identified as having potential to develop. There was an exhibition at the town hall and a web based survey (see photos below). In total there were about 220 responses.





## January - November 2023: Evidence gathering

2.8 There was a bit of a gap before the next consultation, due to changes in personnel, the Covid pandemic and a lack of consensus over which sites should propose to be allocated in the plan. This period was given to gathering evidence relating to the issues raised in the initial consultation. This covered the following topic areas which formed the chapter headings in the plan:

- Housing – addressing the needs of the community.
- Design and character of development – ensuring it reflects the character of the surrounding area which is particularly important in and close to the town centre with the presence of the Conservation Area and its heritage .
- Economy – helping employers to thrive, particularly retailers in the town centre where they should help to enhance what makes Hungerford’s town centre special.
- Getting about – improving walking and cycling in and around the town and into the countryside.
- Leisure and wellbeing – improving leisure, sports and play facilities, protecting green spaces of value and improving wellbeing and safety through high quality design.
- Climate change and biodiversity – encouraging development to maximise sustainability and be wildlife-friendly.

## November 2023: Site options consultation

2.9 The next consultation took place in November 2023 on the site options. The report of this consultation is linked here: [report of consultation Nov 2023](#). This explains the process, which was a combination of web based, public exhibition at the town hall and a continuous exhibition at the library. The approach taken – of packaging combinations of sites into a

series of options – was taken to provide clarity for the community as to the genuine options and their relative merits and issues. Whilst the community was split in its preference for the options, a preferred option was identified and the detailed comments from residents helped to shape the detail of the final allocations.

- 2.10 The consultation with an exhibition at the Town Hall took place over three days and was well attended (see photo below).



- 2.11 The results of the combined web based consultation and exhibition are summarised in Table 2.1 below which lead to a fairly clear preference for the combination of sites in Option A.

**Table 2.1: Summary of site options consultation**

Option	Description	Responses	%
A	Smitham Br + Rear of Cott Cl	112	46%
B	Salisbury Rd	74	30%
C	Salisbury Rd + Rear of Cott Cl	25	10%
D	Salisbury Rd + Smitham Br	12	5%
E	All Sites	16	7%
N	No preference or no development	4	2%
Total		243	100%

### **3 REGULATION 14 PRE-SUBMISSION CONSULTATION**

- 3.1 The Neighbourhood Plan Steering Group finalised the Draft Neighbourhood Plan in January 2024. The Regulation 14 Pre-Submission Consultation ran for a six week period from 16<sup>th</sup> February 2024 to 29<sup>th</sup> March 2024.
- 3.2 An extensive list of statutory consultees were directly informed of the consultation. In addition, a range of parties that the Steering Group considered were likely to have an interest in the plan were also written to. This was undertaken predominantly by email. The full list of statutory consultees that were written to is as follows: [Statutory Consultees Reg 14.pdf \(hungerford-tc.gov.uk\)](#). A form for responses was included: [Reg14 Consultation Sheet](#) and made available on the Hungerford Town Council website for anyone else wishing to use it for their representations. There were posters put up around the town encouraging input and comments from the wider community. ([Reg 14 Poster](#)) and articles were published in all the local press outlets previously used.
- 3.3 The consultation was hosted on the Hungerford Town Council website ([HTC website](#)), with representations accepted by email or paper copy (by post). Paper copies of the Plan were made available in the library.

#### **Responses**

- 3.4 In total there were 112 representations – 64 were made using the online form, 8 were sent by hard copy and 40 were made by email. The representations made and the responses by HTC, including any amendments to the Plan, are contained in a separate appendix (Appendix A).
- 3.5 Whilst West Berks Council provide a response during the consultation period, it was unable to provide a full response until 5<sup>th</sup> August 2024. These representations were considered in the same way and any appropriate amendments were made.

## **Appendix A      Regulation 14 representations and responses**

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Resident	Impressive plan at first glance	How about domestic wind turbines? Should we be thinking about them as well as solar?	Noted	
Resident	I support and am happy with the proposals in the plan. The housing sites and number of dwellings is in keeping with the best interests of the town.		Noted	
Resident	General: All houses MUST be fitted with solar panels to the roof and catchment tanks in the basement.		Such a requirement is not within the gift of a neighbourhood plan.	
Resident	No additional comment	No additional comment	Noted	
Resident	I think in general the Draft Plan is an excellent document and would serve as a good basis for future development of the town. My only reservation relates to the future housing sites that have been selected and the methodology used for that which I will expand on in my comments against the SEA.	<p>Sections 6: In general the Assessment Methodology and the relative ranking of the 5 options looks okay. I do however think that there should have been a separate scoring done for each of the 3 sites. Only Hung14 (Salisbury Road) has been scored separately with Hung 7 (Smitham Bridge) and Hung 20 (Cottrell Close) scored as a combined option. I understand that this has probably been done because as separate sites they don't meet the target but it prevents assessment and ranking of the 3 sites separately. For instance if Smitham Bridge were especially bad for flood risk now is this reflected in the overall scoring. In my experience this is a very wet piece of land.</p> <p>Section 7: Establishing the preferred approach seems to basically ignore the Section 6 Assessment under which Option 1 scores 14 against Option 2 score of 10 (lowest score demonstrates least impact/lower risk/superiority) and only consider the household survey response where Option 1 does score significantly better than Option 2. One would normally expect to see a weighting given to each of the assessment criteria and a weighting to the household survey result with a final overall balanced score being established. This is not apparent in this assessment and the subjective household survey seems to outweigh the objective assessment, but with no weightings provided.</p> <p>Salisbury Road development (Hung14) has always been viewed by the residents of the town as adding to the existing traffic issues and it is unsurprising that the town council shares that opinion. Has a formal traffic study/model actually been developed on that or is it essentially just a gut feel from the majority in the town (and the town council)? I note that at least one member of the council is a transport planner so would like to assume something that is at least semi-scientific has been done in that regard.</p>	Noted	
Resident	Unfortunately I don't agree with the proposed 56 houses. Hungerford is at risk of losing services such as Boots due to our small population. We have already received downgraded rail services with no electrification and John O Gaunt school has such a small number of pupils I am not sure that those who attend it receive as rounded an education as those who attend larger schools. Hungerford has great road connections to the M4, the potential for a great rail connection, a fantastic school and to have a vibrant town centre. To achieve this potential we need hundreds of new houses. There is lots of space near the A4 and a large development could be granted on the basis of local services being improved. A second point I would like to make is around a pleasant to be in park space. The common is miserable from spring to winter due to the number of cows. Other than walking and even then the cows can be dangerous the common is not family friendly. I believe the common land to the left as you exit Hungerford should be fenced off and turned into a large recreational park where families can picnic and play games.		The requirement for a minimum of 55 dwellings has been established by the emerging West Berkshire Local Plan.	
Resident	'the growth of Hungerford' is mentioned several times - to show this might be worth you inserting a chart showing the past (from 1900?), and planned/expected population growth of Hungerford out to 2014? Just to give some idea of scale - in the front demographic section? the data I have seen shows that places that do not grow with younger families, then age as the young choose elsewhere to live, and then slowly wither as retailers leave etc.	Looks good - well done - good demographic data - similar including the expected/planned future would be great.	Growth over the past 125 years is not wholly relevant to modern times. Data on forecast population to 2041 is not available at parish level.	
Resident	We would object against this development. As residents of church street we know that the area and road is already too busy. There are lots of young families who walk along the road going into town or to the nearby nursery or playground. And if there were even more traffic than there currently is, this would be unsafe and unfit. There is regular congestion on church street, the road is not wide enough to support the existing volume of vehicles and would mean constant buildup of traffic.	See above	Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals. The footway which runs along Standen Bridge Road and Church Road will be retained.	
Resident	I am concerned about the number of new houses proposed for Smitham Bridge. The traffic past our properties at the far end of Church Street is already far too heavy for a small street especially with the huge lorries coming from and to the small industrial estate. The bottleneck at the far end of Church Street is already quite dangerous with drivers often ignoring the right of way signs. At rush hour the streams of traffic are continuous with several parts of Church Street only accessible by single file traffic which causes holdups. I cannot imagine how this will be with another 50 or so households feeding into it. If the industrial estate could be sited somewhere else on the outskirts of the town then it might make sense as often the heavy lorries are perilously close to the pavements making walking down the street extremely uncomfortable.		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	Smitham Bridge road dwellings. I am unhappy that these dwellings are going to be built in this location. This will cause long term issues with traffic on this road. It is the only road to get to town from penny farthing and it is near enough single lane traffic at the moment because of parked cars the whole way down the road. If you were building bungalows or 2 plus bedroom homes this would be preferable as the one bed homes in shalbourne close and penny farthing have always attracted anti social tenants because it's cheaper housing. So having even more smaller homes will draw even more anti social behaviour. Noise is also an issue as it echos in this area when you have noisy cars speeding up the hill, parties etc it is very disturbing. So building work for a long length of time will be an issue regarding noise. Building work also leads to mess all over the roads causing stone chips and potential tyre issues or window chips (this has happened plenty of times from the tractors). Land is available in other areas of the town. I personally think the town is too busy and adding more residents would cause massive traffic delays and anti social issues.		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Honest by Design	I don't agree with the decision to build a new housing development on the land at Smitham Bridge Road. This will increase traffic on North Standen Road and create more pressure on parking in the local neighbourhood, as well as disturbing the countryside surrounding Smitham Bridge Road, Chilton Way, Shalbourne Close etc.		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	I am unhappy with the plan due to the increase in traffic it will create down a currently peaceful road, along with this the field behind 12-17 Smitham Bridge Road and the industrial estate is used for dog walkers, runners and somewhere to enjoy nature		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals. The public right of way along the edge of the site will be retained and improved.	
Parliament	We received a notice from a concerned residence regarding new developments areas proposed to the west of smitham bridge road and green land surround our house. We agree that we do not wish to increase the already high rates of road traffic significantly which this development would do. We would like to say that as a young couple, part of the appeal of moving to Hungerford is to be surrounded by the natural beauty of the place and for the historic aspects of the town, sensitive to the heritage architecture. I would not support the 44+ houses on land to the west of our property for transportation, parking issues, biodiversity, landscaping, heritage, sound pollution, and sustainability reasons.	We received a notice from a concerned residence regarding new developments areas proposed to the west of smitham bridge road and green land surround our house. We agree that we do not wish to increase the already high rates of road traffic significantly which this development would do. We would like to say that as a young couple, part of the appeal of moving to Hungerford is to be surrounded by the natural beauty of the place and for the historic aspects of the town, sensitive to the heritage architecture. I would not support the 44+ houses on land to the west of our property for transportation, parking issues, biodiversity, landscaping, heritage, sound pollution, and sustainability reasons.	Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	<p>Ref : Land at Smitham Bridge Road</p> <p>We are writing in connection to the plan to build 44 houses on the land at Smitham Bridge Road (Policy HUNG12) as detailed in the Hungerford Neighbourhood Plan 2024-2041.</p> <p>We appreciate that development must take place to meet housing demands within the Hungerford area but we believe that due consideration should be made relating to the following concerns relating to HUNG12, as detailed below. Some of the points may be included within the Neighbourhood plan but are bulleted below to reinforce the concerns.</p> <p>Traffic. The volume of traffic travelling along Church Street, Smitham Bridge Road and North Standon Road will clearly be adversely affected by the development. Living in Somerset Close we use these routes regularly and are aware of the diverse nature of the vehicles that use the roads at different times of the day, in relation to both residential and industrial purposes. We encounter large flatbed and articulated lorries that just about manage to negotiate the 8€ narrow' roads and associated parked cars sometimes necessitating driving partly on pavements thereby causing a hazard to pedestrians. There are several sections of the pavement infrastructure from the High Street towards the development's location that are extremely narrow (or non-existent) endangering pedestrians, including those pushing children in pushchairs or old / disabled residents using motorised wheelchairs. Consideration should be given to improving this infrastructure to minimise / mitigate the danger that these sections engender. There is a significant 'pinch point' at the junction of Church Way and Parsonage Lane. The Give Way sign has limited value as frequently cars do not stop at the road markings and wait within Parsonage Lane until the road is clear. Indeed, the left turn from Church Way into Smitham Bridge Road is an accident waiting to happen as the sight line is non-existent. Should the development proceed, consideration should be given to improving the junction with 8€movement controlled' traffic lights to control the flow of traffic such that the danger of any accident is firmly mitigated.</p> <p>Consideration to reducing the speed limit to 20 mph should be given to encourage drivers to reduce their speed</p> <p>Environmental / Pollution</p> <p>Measures should be put in place to prevent water run off pollution into the Shalbourne to protect the chalk stream habitat.</p> <p>Development should provide clear signage for the Public Right of Way</p> <p>The Construction Management Plan should include stipulations to prevent antisocial working patterns as was experienced at the Industrial Estate when one of the units was being refurbished during the summer of 2023 8€ work was undertaken over a weekend involving high pressure hoses causing significant disturbance to neighbouring properties.</p>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	The other comments are noted and are addressed by the conditions placed on any subsequent planning permission for development.
Resident	Overall the plan makes sense. I am however concerned about the overall impact on the traffic flow through the town, especially from the Policy HUNG12 development. This will inevitably cause traffic problems along Church St, especially where it joins Smith Bridge Road where the road narrows considerably and is already dangerous to pedestrians to cross. In addition because of the left turn where Church St meets the High St there will be an inevitable large tailback at rush hours. I dont see a way of elevating this problem, perhaps you can ?		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	The proposed development of 44+ houses off Smitham Bridge Road is in my opinion not very well thought through. The increased traffic volume along what is already a congested road just doesn't make sense. The road already struggles with congestion due to lorries and from Church Road is very narrow in places with one way traffic only. A development on Salisbury Road would make much more sense where traffic flow can be disbursed.	The government is placing restrictions on farmers to reach carbon reduction levels and is making them re wild their land yet Hungerford is proposing to build more houses on green belt land. Brown field in fills is much more environmentally friendly but developers don't make as much money from brown field. Hungerford TC should be considering Brown field sites as a property is they are serious about conserving an AONB.	Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	<p>As a resident of Church Street in a property is some age I am concerned as to the impact of the planned residential site at Smitham bridge road. My initial concern is to the construction traffic that will undoubtedly access this site from the town. Whilst I review in the plan that the North Standen road is intended to be utilised this is a single track road with limited passing areas and access points. The construction traffic down church street will impact significantly to the residents and local community who both the elderly and the young use this to access the doctors surgery and nursery at the Croft.</p> <p>The age of the properties on Church street and on the side of the road that our house is the properties are directly on the roadside, heavy construction traffic coming close to the houses when cars are parked on the opposite side of the road will undoubtedly cause damage to these older historical properties many of which do not have foundations.</p> <p>I work from home frequently with my study overlooking church street. Particularly in the morning and afternoons there are elderly residents going to the doctors surgeries and young children and families going to the doctors and Croft nursery. Construction traffic on this road will cause added danger to these community groups.</p> <p>On completion of the work the additional houses will drive additional traffic down this road. The exit from Church Way onto Church street is not easy and I have witnessed occasions when traffic is heading to and from Smitham direction and this bling spot can be dangerous.</p>	I would question if this area is free from flooding	Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals. Appropriate conditions will be placed on construction activity to minimise the impacts.	

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Resident	<p>i) The site allocation detailed in Section 10.2 "Land at Smitham Bridge Road" where a minimum of 44 new dwellings are proposed, does not take into account the difficulty of access which is solely via Church Street and Smitham Bidge Road which narrows to a single car width (indeed there is road signage indicating priority to oncomming traffic travelling westwards along Church Street) between the junctions with Parsonage Lane and Church Way. Any additional development to the west of this point will only exacerbate the already congested route along Church Street between this point and the High Street.</p> <p>ii) Considering expansion of the local housing stock more generally, more houses mean more people and the need for additional local services - schools, GP and dentist surgeries, supermarkets etc. Unless the latter can be provided, the balance between population and the services they requie may no longer be met, turning the town into yet another overloaded dormitory town that cannot sustain itself, requiring residents to travel to larger towns for essential services with the consequential environmental impact that entails.</p>		<p>Whilst the comments in point i) are acknowledged, WBC Highways Development Management has not objected to the proposals.</p> <p>Point ii) is noted. The need for such provision is addressed through the West Berkshire Emerging Local Plan which has established what additional infrastructure is needed to support the scale of growth planned for.</p>	
Resident	Overall, it is an excellent document, with good ambitions to support the future prosperity and positive growth of Hungerford. I support its conclusions on the preferred future development sites.	No comments.	Noted	
Resident	I hope something is going to be addressed with individuals parking on curbs around Hungerford and Jethro Tull Lane, this is blocking both the highway and the foot paths..	The embankment along the canal has seen better days, I hope these are going to be addressed following recent flooding.	This is a parking enforcement matter that is not within the gift of the neighbourhood plan. It should be reported to the appropriate authorities.	
Resident	<p>Although I am retired, I spent 40 years in management roles, dealing with contracts, accounts and so on. Even so, I find the number of documents and references in this plan somewhat overwhelming.</p> <p>Would it not be possible an 'Executive Summary' with key bullet points to make it more friendly with the general public.</p> <p>I am in general agreement with most parts of the plan. I think any new housing should be in the confines of existing Town boundaries, rather than continuing to extend the outskirts of the town.</p> <p>I know this is a plan up to 2036, but feel some needs to be addressed more quickly. Such as:</p> <ul style="list-style-type: none"> <li>* Road improvements to cope with HGV traffic though the town</li> <li>* Better local transport</li> <li>* Assured access to a Pharmacy in Hungerford</li> <li>* More shops and restaurants</li> </ul>		<p>It is recognised that there is a lot of information. At referendum stage we will endeavour to prepare a summary.</p> <p>Matters such as road improvements and access to medical services is outside the remit of a neighbourhood plan. The plan seeks to protect the High Street. A separate Town Centre Strategy is being prepared which will seek to attract more of the uses that can thrive in the town.</p>	
Resident	I think that the sites proposed are the most suitable. They are within easy level walking distance to the town centre and station and other amenities.	Agree	Noted	
Resident	<p>I would like to see more of the empty shops filled with local providers. I would especially like to see a much larger Pharmacy that would be able to cope with the volume of work. This will be especially needed as the Government asks Pharmacists to see people and provide prescriptions.</p> <p>It would benefit the town centre to have some more/better restaurants and if the existing pubs could offer better quality eateries that would be a benefit.</p> <p>More outside spaces with cafe/eateries would be nice during summer when there are also many visitors.</p> <p>Parking needs extending to cope with the extra visitors.</p> <p>We, particularly, older residents would leave our cars at home if there was a regular bus going up and down the hill.</p> <p>I would like to see the Police tackling local issues, anti-soocial behaviour and drug selling/taking in Hungerford.</p>		<p>The plan seeks to protect the High Street. A separate Town Centre Strategy is being prepared which will seek to attract more of the uses that can thrive in the town.</p> <p>Matters within the remit of the police are not ones that the neighbourhood plan can address.</p>	
Resident	<p>Proposed Housing Development Smitham Bridge Road</p> <p>I object to this proposal on the grounds given below:</p> <p>1)The traffic flow in Smitham Bridge road is already limited to single line passing because of the number of parking spaces in the road together with the narrow intersection between Church Way and Church Lane and the dedicated parking before the Library car park. With the planned additional 44 houses with an estimate of say an extra 90 vehicles using the road it will cause a number of traffic issues. There could be an effect on the easy and quick access for emergency vehicles.</p> <p>2)Drainage on a steep hillside is a further issue, also what effect will the increase in water usage have on the existing supplies.</p> <p>3)The Shalbourne Brook which is a chalk river stream and is adjacent to the site, so consideration must be given to pollution from the development and possible flooding.</p> <p>4) It is difficult to see how shielding the industrial site can be achieved in view of the high level ground westwards</p>		<p>Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p> <p>Any planning application must demonstrate that it will not have an impact on local streams and visual impacts from the industrial estate. Thames Water has said that there is sufficient capacity in their network to supply drinking water.</p>	
Resident	Church Street / Smitham Bridge Road is already a busy road with limited access. We feel that a major development at the end of the road would have an unacceptable level of impact - both with the works traffic and the additional transport access needed for the new housing		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	I am happy with the plan	I am happy with the SEA	Noted	
Resident	<p>I believe that this idea of a new neighbourhood on the land off Smitham Bridge Road would have a very negative affect on the area. There are already problems with traffic in this area. Some motorists use it as a cut through at speeds that are far too excessive. There are many cars that park there and sometimes cause issues. There are delivery lorries going to the small industrial estate.</p> <p>Smitham Bridge road is not adequate to deal with any more traffic.</p> <p>Then there is the negative impact this will have on the environment and wildlife. The pollution to the small stream which will in turn affect the marshland.</p> <p>I understand that people need somewhere to live but surely there are better areas to build on.</p> <p>I forgot one am against any more building in this area and the more people I talk to say basically the same. What does worry me is that residents of the area believe that no matter how much they object, nobody will listen to them. So I would ask on behalf of everybody and the environment, please find another area to build upon.</p>	See above	Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	<p>Dear Sir,</p> <p>I wish to make my objections to the planned development in Smitham Bridge Road, based on the following points:</p> <p>THE ACESS FROM THE HIGH STREET TO THE PLANNED SITE IS NOT SUITABLE FOR UP TO ANOTHER 44 VEHICLES TRAVELING PER DAY, PARTICULARY WITH THE ONE WAY AT PARSONAGE LANE.</p> <p>ON AN ENVIROMENTAL BASIS THIS SITE SCORED THE LOWEST WITH THE SITE ON THE SALISBURY ROAD SCORED HIGHEST.</p> <p>THE SALISBURY ROAD SITE WOULD HAVE MUCH BETTER ACESS FOR SCHOOLS AND LEISURE, ALSO TRAFFIC ENTERING AND LEAVING THE TOWN.</p> <p>SMITHAM BRIDGE ROAD HAS A HISTORY OF FLOODING, PHOTOS ATTACHED, THIS WOULD BE GREATLY INCREASED WITH THE CONCRETING OF THE PROPOSED SITE, HAVE YOU SEEN THE TV PROGRAMME "THE FLOOD" THE SALISBURY ROAD SITE HAS NO RISK OF FLOODING, SHOULD YOU GO AHEAD WITH THIS PROPOSED SITE PLEASE NOTE FOR THE RECORD MY OBJECTIONS</p>		Whilst the comments are acknowledged, WBC Highways Development Management and Drainage teams have not objected to the proposals.	
Resident	I wish to congratulate the NDP team for their dedication to Hungerford's plan. I believe the plan is comprehensive and considered. Hungerford will greatly benefit from the plans proposals.	A comprehensive assessment.	Noted	
Resident	<p>I will be pleased to see Hungerford's Neighbourhood Plan adopted through referendum in due course.</p> <p><b>I fully support the proposals described in the draft NDP. Although I am a resident of Marsh Lane, I support the allocation of the Smitham Bridge Road site for housing as it has less impact on High Street traffic than other options and will also secure the future of the Marsh Lane allotments</b></p>		Noted	
Resident	When I moved here in 2021 I took a good look at all the gorgeous fields and thought, enjoy this now; they'll build houses all over this one day. It's a shame that it's happening so fast, but I do recognise the need for more - and more mixed - housing. I walk through the Smitham Bridge Road site daily on dog walks, so am pleased to see the public right of way will be maintained. It will be sad to lose the first field, but if access remains to the second, larger field, and to Standen and beyond, that will be some consolation. I hope we will retain some of the wildflowers and grass, for nature's sake, and for the feeling of being in a field and not walking on lifeless tarmac all the time.		Noted	
Resident	I support the plan	I support the plan	Noted	
Resident	<p>My comments largely revolve around making the two proposed development sites the best for wildlife that they can be.</p> <ul style="list-style-type: none"> <li>- I would encourage the planting of street trees within the developments but also push for ongoing care, at least the watering of such trees in their early years. I would insist using native trees only (and or native shrubs only for hedging) with a focus on providing a range of ecological niches for wildlife such as spring flowers (pollen), autumn berries and a range of native tree sizes i.e. species.</li> <li>- Where possible I would strongly encourage Hungerford council to push for greater than 10% biodiversity net gain (BNG). BNG does not include features such as swift bricks in its calculations but I would expect to see HTC requesting swift bricks, bee bricks and bat tiles installed in new build houses by developers. If any habitat banks are used for BNG offsetting, ensure these are as local to Hungerford as possible. Maybe the Undy's Meadow project could be funded with BNG money and become a habitat bank?</li> <li>- I would strongly advise a large buffer strip (25 metres) to be left on the east of the Smitham Bridge road site where it borders the Shalbourne Brook. This has the potential to be an important natural green space and location for SuDs to catch urban runoff from directly entering the brook. This would also mean the public footpath can remain an unsealed surface again reducing runoff and flashier hydrographs.</li> <li>- I would like to see a request made to use CIL money to fund the de-canalisation and re-meandering of the Shalbourne Brook where it passes through the site. This would have huge benefits for wildlife as they can access the stream bed again (currently concrete).</li> <li>- I would like to see street lights put on timers to turn off at midnight for example. This could be significantly beneficial to wildlife particularly at the cemetery as cemeteries tend to be very good for nocturnal wildlife such as bats.</li> <li>- It would be nice to see the efficiency of new homes be above standard. New builds are not currently built to a standard that will help us meet national emission reduction targets so it would be good to put Hungerford in a flagship position with highly efficient developments. This will help reduce bills for future residents to giving them greater financial security. Solar panels and electric car chargers on all new homes would be great to see too.</li> <li>- It would be nice to see the creation of a designated cycle lane, maybe funded by CIL money. I propose a cycle lane runs from each development into the high street. This will be particularly beneficial along the A4 and High street roads.</li> </ul>	The environment is our future so ensure its best interests are always put first. Challenge the cutting down of trees and hedges always to ensure unnecessary site clearance does not occur. Protect the waterways from urban runoff.	<p>All points are noted. Various matters of detailed design can only be dealt with through a planning application. The Neighborhood Plan has policies which push for development to maximise biodiversity, including Policy HUNG11 which requires a minimum of 10% (as limited by national policy). The same applies to the standards for home energy efficiency.</p> <p>Proposals for CIL spending will be noted by HTC.</p>	

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Resident	<p>HUNG 13: Land North of Cottrell Close</p> <p>I am concerned about the possibility of this development being approved for the following reasons:</p> <p>1. Access to the site is proposed through Cottrell Close.</p> <p>1.1 Cottrell Close has limited parking space for the present affordable housing. I recently counted the number of vehicles within the Close at 10.30pm one evening. There were 72 vehicles. A sizeable number were parked either on the road or footpaths and one house has four vehicles of which two were on the footpath. Cottrell Close is a narrow road. My concern is that with a further 12 houses, up to 24+ more vehicles, the present situation will become worse. Given, the present parking on Cottrell Close and footpaths, access to the new houses could be difficult particularly for emergency vehicles.</p> <p>1.2 Given the present number of vehicles in Cottrell Close, during the day, delivery vehicles have difficulty in navigating the Close. I regularly witness this.</p> <p>1.3 Congestion in accessing the A4. The A4 is now busier than it used to be and it is already difficult at peak times to join the A4, particularly when turning right into Hungerford. The A4 has a well known speeding problem and this contributes to the problems of joining the road. An additional 12 houses is only going to make this worse and under present traffic issues on the A4, the risk of accidents will increase.</p> <p>2. Access to the site from Cottrell Close.</p> <p>2.1 The present turning into the area is not wide enough to take two vehicles side by side. There is insufficient land on either side to widen the access and to provide a footpath for pedestrian access. This will only create a bottle neck and a danger to pedestrians.</p> <p>2.2 In order to reach the site, the gradient from Cottrell Close is very steep because of the rise in the land. I have walked this and, as a fit person I know how steep this is.</p> <p>3. Environment Issues</p> <p>3.1 A substantial number of trees will need to be removed for the construction of the access road and houses. Does the removal of trees fit in with the Council's environmental plan?</p> <p>3.2 Is the present rain water drainage in Cottrell Close able to cope with the additional tarmac or is the run off going to enter the chalk stream on the other side of the A4. The present balancing pond adjacent to our house, has in recent weeks had a lot of water in it. Can it cope with anymore and if so, what is the danger to our property?</p> <p>I urge the council to reconsider the suitability of this proposal.</p>		<p>1 &amp; 2. Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p> <p>3.1. Any planning application must provide a net gain in biodiversity of at least 10%. The loss of trees results in a significant deficit in this calculation, therefore such losses are likely to be kept to a minimum and will need to be more than offset by other enhancements in biodiversity.</p> <p>3.2. Whilst the comments are acknowledged, WBC Drainage team has not objected to the proposals.</p>	
Resident	<p>The overall content of the Plan is very good and should support the vision laid out for Hungerford.</p> <p>Section 10: I am supportive of the two chosen site locations - Smitham Bridge Road and Cottrell Close. These prevent further urban sprawl of the town southwards and, with careful management, should meet several of the Neighbourhood Plan Objectives in section 3.2.</p>		Noted	
Resident	The Plan is excellent. Agree with all the key policise and proposals. Could consider adding a policy that encourages rural exception sites to help deliver more affordable housing.	A useful independent review of the Neighbourhood Plan	Noted. Hungerford is not a designated rural area where exception sites are permissible. This is due to its size.	
Resident	<p>Section 10 - Site Allocation - Smitham Bridge Road</p> <p>I am very concerned about the plans to build 44 further homes off Smitham Bridge Road, living directly on Church St, the traffic is already extremely busy, particularly at rush hours, and always active through the day as it provides access to the Doctors Surgery, nursery school and the Croft and Croft Hall, as well as the church.</p> <p>The junction with Church Way is already a death trap, with no visibility towards Smitham Bridge Road and the width of the road is severely restricted at this junction and indeed along the entire length of the the access from the High street to the proposed development site.</p> <p>Whilst comment is made about the access being from North Standen Road, the reality is that the majority of both works traffic and residents traffic movements are likely to be through Smitham Bridge Road and Church St.</p>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	<p>Strongly agree with Action F point 2. Train operators need to improve the services between Hungerford and London. Trains are infrequent and very often delayed, which denies access to lucrative job markets in London and Reading. House prices in Hungerford require a well paying job to obtain a mortgage. Younger professionals and those with skills will be forced away from Hungerford, further exacerbating the ageing population issue that is mentioned in the report. An unreliable service, means that parents who work in London cannot guarantee they will be back in time for Childcare pick ups, forcing young families out of the area, and disproportionately affecting female careers. This must be a priority for Hungerford leadership moving forward to ensure growth and prosperity in the community.</p> <p>Agree with point 10: site allocations. Those sites seem to ensure that Hungerford will continue to grow and provide access to housing while also minimising large housing "sprawl" that would impact on the climate, green spaces and attractiveness of the town.</p> <p>Local green spaces, wildlife and bio diversity really set Hungerford apart from many similar sized towns so it is great to see those point captured in your report.</p> <p>Great that you have included plans to improve access to safe and high quality cycle routes (7.2 Getting about). As a family we find that we have to drive to alternative towns for a family bicycle ride so our young children will feel safe on their bikes. This is a shame because we surrounded by such beautiful scenery, and the drive is bad for the environment.</p>		Noted	
Resident	<p>My comments are in relation to the proposal</p> <p>5.7 Policy HUNG3 - I think some of the 'gateways' into Hungerford are misleading. The North Stanton Road approach (coming down from Froxfield) is very much a country route. It's single track and very rural, and I don't think it should be counted as a 'gateway' when considering access to the proposed housing on the land at Smitham Bridge Road. Realistically that is not how vehicles will approach - it will be coming up from Hungerford town centre.</p> <p>10.6 Policy HUNG12 - my concerns are:</p> <p>1. Additional vehicles from households for the site parking on Smitham Bridge Road, as typically adequate parking is not built with the properties. This will make driving harder and less safe. Young children frequently walk to the park nearby, and I would be concerned about their safety with the increased traffic.</p> <p>2. Encouraging people to walk should be a factor in the plan, but increasing the traffic will make that more difficult and less safe.</p> <p>3. As mentioned above, all the traffic will access coming up from the roundabout by the town hall, not coming down from Froxfield. So traffic along Smitham Bridge Road and Church Street will increase significantly.</p> <p>4. Give way/narrow area at junction/s with Smitham Bridge Way/Parsonage Way/Church Way, which is already quite difficult to cross. I walk there nearly daily with small children walking to school/nursery and it's always a hard area to cross, and difficult to see. Cars do not give way properly.</p> <p>5. Concerns about flooding - we had high water over this winter, I imagine building on the area would increase this, and it's not clear what the plan would be to mitigate this.</p> <p>6. It's a lovely area of open countryside, why do we need to build on open land when another site was proposed on the Salisbury Road that would be better suited to handle the increase in traffic?</p> <p>7. The plan makes no mention of how the nursery, school, doctors or local shops are supposed to cope with the additional people this would bring into the town.</p>		<p>HUNG3 - The purpose of the policy is to ensure the setting of these routes, as gateways where there is the transition from countryside to town, are not compromised by development. It is not a matter of relevance when considering vehicle access to a site.</p> <p>HUNG12 -</p> <p>1.4. Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p> <p>5. Whilst the comments are acknowledged, WBC Drainage team has not objected to the proposals. All development is required to fully mitigate its impacts on flooding.</p> <p>7. The need for such provision is addressed through the West Berkshire Emerging Local Plan which has established what additional infrastructure is needed to support the scale of growth planned for.</p>	
Resident	Why do we need more housing with no improved infrastructure	Keep the green land	The requirement for a minimum of 55 dwellings has been established by the emerging West Berkshire Local Plan.	
Resident	<p>I fully support the development of land to the east of Smitham Bridge Road and to the north of Cottrell Close as proposed in the draft neighbourhood plan, however I think significant opportunities to improve the plan may have been missed.</p> <p>The best way to deliver the required housing within the town, whilst protecting employment and enhancing the High Street, is by the use of sensitive infill of otherwise undeveloped land, or land which could be better utilised for the town's goals:</p> <p>The Station Road Protected Employment area should be removed/re-categorised and ways sought to utilise this land for residential and parking purposes close to the town centre. This whole area is close to the town centre and other amenities such as the Station and canal, so residential development (particularly for elderly residents) would reduce car use and the issues with heavy goods vehicles currently seen in this area. The protected Employment Zone could easily be relocated to the undeveloped areas in Chamham Park, or on land to the west of the B4192, opposite Chamham Park. I believe that extending the "industrial area" of the town in this area would ease congestion issues created by the current Station Road Zone, and would create a focused and beneficial employment area.</p> <p>There is more than enough land in the Station Road Protected Employment Area to facilitate additional parking, adjacent to the existing car park, as well as high quality housing alongside the canal (on the Saxon site) and to the east of the railway station.</p>	n/a	<p>The requirement for a minimum of 55 dwellings has been established by the emerging West Berkshire Local Plan and must be delivered through allocations of specifically identified sites. It cannot be delivered by windfall development on unidentified infill sites.</p> <p>The Station Road Employment Area is designated in the West Berkshire Local Plan. It is not within the gift of the Neighbourhood Plan to de-designate it without allocating an equivalent site elsewhere in the town. Chamham Park is already designated as an employment area.</p>	
Resident	<p>PROPOSED DEVELOPMENT PLAN AT SMITHAM BRIDGE ROAD HUN7 or HUNG12.</p> <p>Vehicular Access (VA) From North Standen Rd:</p> <p>Why not have this VA access down where the current Footpath opposite the Hungerford Trading Estate (Right Of Way HUNG 46? 'Path(um)' ?) is situated.</p> <p>This would make sense if one cannot build on this area because of potential flooding. The re-routed Footpath could then just lead off this VA access way. It would be good if this Footpath can be upgraded with a permanent surface, lighting etc. Having the vehicular access further up North Standen Rd would ruin the peace and quiet of this road! As well as eat further into our countryside.</p> <p>FOOTWAY BETWEEN THE [COTRELL CLOSE] SITE &amp; A338 EDDINGTON HILL.</p> <p>Every main road should have a good Footway/Cycleway.</p> <p>Not everyone can drive a car.</p> <p>And we should be working towards making it safer and easier for Walkers and Cyclists, instead of always for Motorists.</p>		<p><u>Alternative vehicle access to Smitham Bridge Road site - is this feasible?</u></p> <p>The improvement of walking and cycling routes is addressed generally in the plan.</p>	

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Resident	I have major concerns in relation to the proposed site allocation at Smitham Bridge Road (policy HUNG12). Church Street would suffer significantly due to the inevitable increase in traffic particularly as there are two major pinch points where traffic is single file (church st and church way turning and church st residential parking just passed prospect road turning). This is not just taking into account the large heavy goods vehicles required for the build but also the sharp increase in new residents vehicles travelling this small road post build. More vehicles would lead to stopped traffic to let cars pass at these points which would block the entrance to the fire, police and ambulance station which could put peoples lives at risk if emergency services are delayed leaving due to queuing traffic at that point. Also a number of houses on church street do not have pavements and owners step straight out onto the road. Therefore more cars and lorries moving through this area could increase the risk of pedestrians or dogs being hit by cars. There are a number of very old and historical properties on church street that would suffer with heavy goods vehicles passing through. Also a number of trees would be damaged with increased number of high sided lorries knocking them as Church St is narrow in a number of places. There is a major pinch point on the corner of church way, church street and parsonage lane which is not only a blind corner but single file, making it even more dangerous for cars and pedestrians. There is also a very popular children's play park at the top of marsh lane with children often walking along this stretch of road where the development is proposed. This increase in traffic could increase the risk again to lives if children are out and about. The proposed option of some traffic going via North Standen is not viable as it is single file in many places and traffic using the verges would cause damage to wildlife and the countryside. There is also significant increased risk of flooding if the natural field drainage was removed by the development in this area. We also do not know what impact this would subsequently	The new proposed housing development on the land at smitham bridge road would have a significant impact on the beautiful countryside views; would increase risk of flooding in this area and the increased traffic down church street and the narrow North Standen road access would have a major impact on the verges and wildlife in this area.	Whilst the comments are acknowledged, WBC Highways Development Management and Drainage teams have not objected to the proposals.	
Resident	I am concerned about prospect of flooding and access to Smithambridge Road		Whilst the comments are acknowledged, WBC Drainage team has not objected to the proposals.	
Resident	I wish to comment on the POLICY HUNG12: LAND AT SMITHAM BRIDGE ROAD 1 This is a totally inappropriate area to build houses. As known the presence of the stream bordering the east side of the site means there is a high risk flooding along the eastern part of the site and indeed there has already been flooding in this area. More houses and more tarmac and concrete will increase the risk and severity of any future flooding as the natural drainage will be lost. There is also the threat of increased pollution to the stream and affects on the wildlife  2. North Standen Road is fairly narrow. There are already issues with the current levels of traffic. The construction traffic will cause major issues and in some cases will not be able to get through due to the high numbers of parked cars along this road. The local farmer struggles every August to get along the road with his combine harvester and the tractors and trailers carting the grain. I do not see how HTC can minimise the impacts of construction traffic along Church Street and Smitham Bridge Road.  3. Once construction is finished 44 houses will mean a minimum of 66 extra cars ( 1.5 cars per household if not more)using this road meaning atleast an extra 132 car journeys along this road. There are already issues with the junctions at Parsonage lane and Church Way junctions which will lead to more accidents. I feel very strongly about this having being involved in an accident already at one of these junctions when a car came out and ploughed into the side of mine. The cars residents cars parked in Church street already cause issues for drivers and an extra 66 cars will make this worse.  4 Currently we can enjoy lovely walks through the field of the proposed site. It was especially valuable in lockdown allowing us to go for walks in our lunch hours to give us a break. I can not imagine how I would have coped if this had been a housing estate. Walking through a large estate does not give you the same sense of freedom and mental well being. Smitham Bridge Road is a quiet country lane and this proposed development if approved will completely ruin it.		Whilst the comments are acknowledged, WBC Highways Development Management and Drainage teams have not objected to the proposals.	
Resident	Regarding the proposed housing on Smitham Bridge Road; why is it sensible to place family housing on the far side of town from the schools? Would it not be more appropriate to situate them within walking distance and on the same side of the High Street? Smitham Bridge Road already has issues with the volume of traffic, both domestic and commercial, exacerbated by the reduced width of the road in places.		The proposed development will provide for a range of housing, not only family housing. The site allocation was selected based on a wide range of consideration, of which access to schools was one.	
Sustrans	Sustrans is the national charity making it easier for people to walk, wheel and cycle. We are custodians of the National Cycle Network (â€ˆNCN') or (â€ˆthe Network'), which passes through West Berkshire and Hungerford. The NCN contributes towards the UK Government aims to enable active travel, to reduce air pollution, to level up health inequalities, and to ensure people live within '15 minutes' walk of nature.  Our vision for the NCN is set out in our Paths for Everyone review. We have two priorities - to make the Network safer and more accessible for everyone. We work with local and national governments to make the Network better and more accessible, and we are experts in delivering upgrades to active travel routes. Recent projects we've delivered in West Berkshire with the Canal and River Trust and West Berkshire Council to improve NCN route 4 include: A.Towpath improvements between Aldermaston Wharf and Ufton Lane, creating an accessible path which is sensitive to the local area. B.Resurfacing of the shared route between Mill Road and the River Kennet at Hissey's Bridge. C.Upgrade of the shared path between Mill Road at Dewe Lane and the Kennet and Avon towpath, to improve accessibility and resilience of the path structure.  We are currently working closely with Canal and River Trust, West Berkshire Council and a key third party to form a partnership to establish a programme that aims to progressively improve the Kennet and Avon towpath across the District. This initiative, called 'Reimagining the towpath', seeks to enhance access to and accessibility along the canal side route in stages over time, similar to the improvements made between Aldermaston Wharf and Ufton Lane. We are passionate about this initiative and moving forwards, with our partners, we would be interested in exploring with Hungerford Town Council and other local stakeholders, scope to upgrade and improve access to the towpath in Hungerford for multiple user groups in a realistic timescale.  The new Hungerford Neighbourhood Plan represents a great opportunity for the town to protect and enhance active travel infrastructure, including NCN 4, helping to meet the plan objectives to 'Minimise the effects of traffic in the town centre and especially the High Street for the benefit of pedestrians and all road users' (objective F), 'Increase walking and cycling in the town' (objective G), as well as to 'Increase resilience to climate change' (objective U). Key means of doing this are to safeguard existing traffic free walking, wheeling and cycling routes and to improve them.  We consider it an omission that there is no mention of the National Cycle Network within the draft neighbourhood plan policies. Paragraph 2.23 refers to 'Sustrans cycle routes through the town centre', but this route is not shown as a key walking/cycle route on the map accompanying Policy Hung6 (fig. 7.1). The NCN should be considered one of the key transport routes through Hungerford (the current alignment of NCN 4 is shown on the maps below, along with the realignment intended with 'Reimagining the towpath'). Through showing this on the Hungerford plan map, this will ensure that opportunities for connections to/from new development, or potential for improvements through developer contributions or other funding are not missed, thus increasing the opportunity for people to have access to good quality active travel routes. We encourage the NCN to be added to the policy map and can provide GIS layers to facilitate this, as indicated in the map in our emailed response.	NA	NCN4 - agreed	Add route NCN4 in as a Key Walk/Cycle Route
	We also encourage additions to the following points/paragraphs:  Point 7.1 - Succinctly and effectively covers the benefits of walking and cycling  Point 7.2 - Subject to a future feasibility assessment this appears to offer potential to improve the canal towpath so that it could serve as a traffic free, multi user route for considerate cycling. Canal tow path A should be considered for improvements beyond Hungerford's settlement boundaries, aligning to the partnership Sustrans, the Canal and River Trust and West Berkshire Council are working to fund with a third party.  Point 7.3 - Also consider a future feasibility assessment to help identify correct lighting and width, along with surfacing. A sealed surfaced, with a spray and chip finish, could be considered like in Aldermaston Wharf providing a surface that retains the character of the area but is accessible to all.  Policy HUNG6 A - commend mention of disabled users! Well designed cycling infrastructure allows use by adaptive cycles, and other groups for mobility B - we support this point, but ask for clarification in the wording to make clear that residents should be able to access the facilities mentioned via active travel modes, with walking and cycling potentially replacing those journeys. We suggest that all development proposals should ensure safe and continuous pedestrian routes that connect to the Key Walk/Cycle Routes, not only where practicable. This should be a priority if the plan objectives are to be met. New routes should be designed to LTN 1/20 standard. C - proposals to enhance the identified walking and cycling corridors should include Sustrans partnership with the Canal River Trust, West Berkshire Council and a third party for the feasibility of converting the Kennet and Avon towpath to a multi-user route, for walking and considerate cycling through Hungerford and between other towns. This specific project will be called 'Creating the connection'. D - safety key and should be done liaising with the local highway authority E - we support this point and suggest that development which is designed to reduce car dependence should also include good-quality walking and cycling infrastructure and/or connections to existing infrastructure.  We would also like to recommend an Action F for Policy HUNG6, that school streets and other improvements to help pupils safely walk and cycle to school will be explored by the town council.		HUNG6B - It is not reasonable to require all developments to connect to Key Walk/Cycle Routes as this would include a large extension of an existing dwelling 3 miles from a route having to make a connection, which is not proportionate.  HUNG6C - the detail of partnerships is not a planning policy matter.  Proposed HUNG6F - this is not a policy matter. However, it is a possible action which HTC will consider.  Quiet Lanes - it is understood that Quiet Lanes do not encourage drivers to use other routes per se. Rather they alert drivers to the fact that they should slow down because there are likely to be walkers, cyclists and horse riders on the road. The designation is something that HTC will consider.  All other points noted.	
Resident	Concerns regarding the increased traffic flow on Smitham Bridge and Church Roads, particularly at the junctions of Church Way and the Croft which are already precarious with poor visibility and become even more so with heavy congestion at peak times. Manoeuvring around the residents parking bays on Church Road is very difficult and this would potentially become worse particularly if people are in a rush ie school/Nursery times. Whilst a noble aspiration, I think it is unrealistic to think that families would walk or cycle to School/leisure centre from Hung12 or Hung13. They are too far, with narrow paths, even if upgraded and no crossing points, thus not in line with objectives G and R (P15/16). Increased congestion at the already congested mini roundabout in town would not "minimise the effects of traffic in the town centre and especially the High Street...." (Objective F Page 15)  Ref Objective A page 14. Above concerns would be addressed by allocating land on Salisbury Road (HUN14 on previous document) which is much nearer town, leisure facilities and schools and where many services and infrastructure etc are already in place as part of the existing new development.  I very much appreciate the trade off for a permanent allotment site at Marsh Lane and we need more affordable housing but I cannot see how development of Smitham Bridge Road and Cotterell Close would be the best option for the town. Thank you to all for the work you are doing on this on our behalf.	Ref Climate change and flood risk (p23 /24) The recent heavy rain has caused flooding near River Shalbourne/Marsh lane/trading estate junction. Increased housing here would surely exacerbate the issue.	Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Resident	<p>HUNGERFORD 12</p> <p>I wish to object to the proposed development in Smitham bridge road my reasons are as follows.</p> <p>Historically i have lived in Smitham bridge road for the last 44 years and i have witnessed numerous changes in the surrounding area. Some have been good and some have been in my opinion totally wrong but without dwelling on whats happened i will list my reasons relating to this plan.</p> <p>1 The plan states that a recognized gateway to Hungerford is along North Standen road and suggests construction traffic and future occupiers of this proposal will use this route to access this site. This is totally nonsense as this road up to the A4 at Froxfield is predominantly a single carriageway way unsuitable for commercial vehicles</p> <p>2 In my experience mixing residential properties with commercial is a recipe for disaster with constant complaints to the council with regards to noise and in this proposal the use of machinery and vehicle movements</p> <p>3 The only practical way into Smitham bridge road is through Church street then through a narrow chicane, you could argue that the chicane is a natural traffic calmer but in reality it causes immense problems for articulated vehicles getting through to the protected employment area ie industrial estate due to the parking arrangements on the road.</p> <p>4 The council has already turned a blind eye in allowing 100 allotments in Marsh lane allowing plot holders to use the site for parking this potentially can create more than 200 vehicle movement along the same route per day. now with a further 44 dwellings and as i believe creates 9 vehicle movements per day will create a further 396 thats a minimum of 596 vehicle movements. Smitham bridge road is not capable of this amount of traffic.</p> <p>5 I am aware that the land owner of the allotment site and the developer are using the allotments as a bargaining tool to obtain planning permission surly this should not be the case it should be judged on its merits not on profitability.</p> <p>6 As a resident of the town i also raised my concerns when the houses at penny farthing close were at local discussions i was led to believe that they were to be allocated to local people which i felt pleased about as my own children were at the stage of entering the property market but it appeared that they were used to re house the residents from Platt court so that site could be re developed.</p> <p>In conclusion i dont have any confidence in the council for making decisions in regards to the existing residents of this area and i hope you can relate to my objections.</p>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	<p>Land at Smitham Bridge Road Hung 12</p> <p>The plan describes North Standen Road as a gateway into the town. North Standen Road is a very narrow twisting road with passing places at some points and at some points in a single track road. I had an accident on a blind bend where it was impossible to see the oncoming traffic. It will not cope with an increased traffic load.</p> <p>A development here will significantly increase traffic along North Standen Road, Smitham Bridge Road and Church Street causing traffic problems and queues to get into the high street at the mini roundabout where church St joins the High Street.</p> <p>At the end of Smitham Bridge Road at the junction with Parsonage Lane and Church Way there is already a blind spot where there is give way/ one way traffic system. Increasing the traffic in this area will increase the hazard and make this junction even more dangerous than it currently is.</p> <p>Of enormous concern to me is the increased risk of flooding this development could cause. I have lived here for over twenty years and have seen flooding at the bottom of Smitham Bridge Road, near Shalbourne Brook. When there is heavy rain, the field where this development is proposed gets very flooded and marshy and this has caused the road to become flooded.</p> <p>Some of the properties in this area already have a medium risk of flooding from surface water and have had flooded in the past. I am very concerned about the increased risk of flooding that will be caused by building on this field which currently provides natural draining.</p> <p>There are badgers and badgers setts close to the proposed development site and I am concerned that the badgers who are protected by law will be negatively impacted by this development.</p>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	<p>Preference option B, Salisbury Rd only. The traffic along church street is already high, with people driving way too fast, parking already difficult. Additional construction vehicles will make Road very congested, as will the additional cars and traffic once development complete. Area of outstanding natural beauty, and the road towards Froxfield is absolutely not wide enough to support traffic, and bound to result in accidents.</p>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	<p>I would oppose the proposal to build dwellings as suggested as this would significantly increase traffic on Church Street where infrastructure is not sufficient. Furthermore, I feel it would severely disrupt wildlife and intrude in an AONB.</p>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	<p>I believe the preferred sites selected in the informal consultation in November meet the objectives required and the needs of the local community. Both sites meet the required housing allocation needs whilst reducing congestion through the town&amp;€"much better than the other non selected sites.</p> <p>Any new housing development will, inevitably, cause uproar amongst some residents (NIMBYS) but it is important to consider the bigger picture and the benefits such a development will potentially deliver to the town. And to carefully weigh up which development causes the least damage and consequences to the local and wider community. No development is without consequence but these two sites cause the least amount of issues.</p>		Noted	
Resident	<p>Regarding HUNG4 Paragraph 10.2 of the Hungerford Neighbourhood Plan 2024-2041</p> <p>I believe that the proposal to site a housing development of 44+ houses on the pasture land adjacent to Smitham Bridge road is a mistake and ill thought out. A number of the assumption made are inaccurate and other considerations have been missed.</p> <p>1. Access.</p> <p>Section 5.7 describes the gateways into Hungerford. Out of the 9 listed, North Standen Road is bar far the least accessible. I find it hard to believe anyone citing this has using this road to enter Hungerford. Coming from the West to the proposed entrance, It is a single track road for its entire length into the town. It has 5 blind 90 degree bends along its length. It is a narrow road with just 6 passing places. On occasions where the A4 has been shut, it has descended into chaos and generally the highways agency does not mark it as a diversion route since it is impractical. Approaching from the East, the road narrows to a natural choke point as it passes Church way where there is also a blind junction. This section is often at capacity during peak periods and this is compounded by the commercial traffic using it to reach the industrial estate.</p> <p>2. Industrial Estate Proximity</p> <p>Section 10.2 proposes screening to minimise the visual impact of the industrial estate. However, it does not account the impact of noise pollution that it will have on the house adjacent to this area. There has been an ongoing problem of noise from the industrial estate to residents in the area. This is especially true in the summer when a number of the units, in particular the metal sheet working company, leave their doors open which amplifies the noise. There is frequent noise over night from vehicles and alarms going off I believe that the value and desirability of these dwellings and undoubtedly will lead to friction with the industrial estate companies.</p> <p>3. Flooding</p> <p>Section 10.3 proposes caution and some additional measures to reduce the risk of flooding. I think this risk is being significantly underestimated. I believe the risk for flooding of the play area and the houses adjacent to it, the industrial estate and the North Standen road will be increased significantly. There have been 2 instances of significant flooding affecting properties in the last couple of years and no doubt this will be made worse.</p> <p>4. Impact on nature</p> <p>I am very familiar with this land and the land surrounding it for the last 10 years and look forward to seeing the survey ( 10.6 Item I) that this is being taken seriously. Of key note is the presence of an old and well established Badger set to the West of the site. The closest used entrance is approx 10 meters from where the propose entry road will be built. All other common UK mammal species live close to the site.</p> <p>Finally, as a general point, i hope that the council will pay very careful attention to the decisions they make and that brown field or the least impact to the surrounding countryside options are considered accordingly. Once developed on, green field sites are lost forever along with the nature that depends on it.</p>	See prior comments. Overall, i found the assessment to be high in polish but lacking in detail	<p>1. Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p> <p>2. Properly screening will need to address noise as well as visual impacts.</p> <p>3. Whilst the comments are acknowledged, WBC Drainage team has not objected to the proposals.</p> <p>4. Policy HUNG12 requires an ecological survey to be undertaken and any impacts on wildlife properly mitigated.</p>	
Resident	<p>Hungerford Neighbourhood Plan 2024-2041 Pre-Submission (Regulation 14) December 2023 falls significantly short in providing a balanced viewed expectations for a town plan and therefore the Town Council should undertake extensive further work before being considered for any form of adoption by the Town Council who should be representing the town not personal interests.</p> <p>The first shortfall in the plan is that it suggests solutions. It highlights the challenges of the plan and aspirations but falls short in outlining resolutions rather than hope or solutions based in realism. The fundamental issues impacting the town are services, namely healthcare, leisure facilities, and retail, followed by a nation-wide issue of housing and transport. Healthcare is only cursory mentioned in the document without resolution. For a town of this size healthcare falls well short notably the accessibility to a timely doctor's appointment, inadequate dentistry relying on residents to travel a distance to get any and a pharmacy operating far overwhelmed and operating restricted hours.</p> <p>In regards to leisure facilities the document does highlight the range for a small town, but fails to provide resolution for supporting growing clubs such as the football and rugby clubs. Youth facilities should continue to grow, it is great to see the new astro turf but how are the clubs being proactively supported by the plan? It therefore does not respond or meet its own objective Objective J: Support the development of sports, arts, youth clubs, social and leisure facilities, including the widest possible range of activities for young people.</p> <p>Retail it highlights the challenge around the high-street but no proactive plan to resolve. Several independent high street shops have failed recently without form of redress. Paid parking clearly is a deterrent (observation of Tesco car park behaviour shows how it is used just as much by those using other retail as Tesco's itself).</p> <p>Transport, again the issues are highlighted but without strong resolution. The train service has deteriorated in the town and the provisions are underwhelming. Yet the report also highlights how industry around Everland Street is an appropriate. A bold plan would reinvigorate the entrance to the town which the report also highlights is of important. Although poorly it pay more attention to the road 'gateways':A great plan would show how the train station could become an entrance with proper provision and working with transport authorities to upgrade facilities. A voluntary group based in Bedwyn provide much more bold plans and proactive plan than this document.</p> <p>Again, the report refers to cycling. An opportunity missed is showing how great cycling provision could be made. A quick survey along the high-street, especially on a Sunday would show the prevalence of Hungerford as a cycling route. A balance of safe cycling routes (as a cyclist myself there is no safe route to access the train station as an example) and then cycling facilities across the town and be an example model town could be created.</p>		<p>Healthcare - this is a strategic matter addressed through the West Berkshire Local Plan.</p> <p>Leisure - the Neighbourhood Plan is a land use plan. It's core role is not to support functioning of the clubs, other than in terms of, where possible, enabling them to meet their needs in terms of land and buildings.</p> <p>Matters in the town centre are being addressed through the emerging Hungerford Town Centre Strategy. This includes addressing matters of the public realm and gateways into the town centre.</p> <p>Cycling. The NCN4 will be highlighted as a Key Walk/Cycle route.</p>	Add route NCN4 in as a Key Walk/Cycle Route

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	<p>Finally, housing. The only part of the plan that actually provides a solution. However, the report is written in a way that provides an indication of a solution on well founded basis. This provides a mask to the rest of the report when no resolutions are provided to the above.</p> <p>Housing is clearly the most controversial and this plan must be rewritten on this basis alone:</p> <p>The proposal put forward is based on an informal consultation based on a response rate of just over 2% of the total population of Hungerford. Para 4.3 in the Report of Development Site Options Informal Consultation indicates a response rate of 9% however this is statistically flawed in that it does not remove any duplicate responses therefore leaving the overall response rate unreliable.</p> <p>The proposal indicates that HUN7 (Smitham Bridge Road) and HUN20 (Rear of Cott Cl) were the preferred locations, however a look at the survey shows how not only was it very close but in fact the questioning was skewed to ensure an outcome was in the favour an authors bias. For example as per the question 1.4 in the Report of Development Site Options Informal Consultation it asks respondents to select one response. If the totals of all those involving Smitham Bridge Road or Salisbury Road are totalled they both have an equal score (54 each) therefore to put forward only Smitham Bridge Road doesn't even reflect the Town Councils own in person survey response. Table 3 in the same document would show a 4% difference between the sites hardly an overwhelming indication of the towns preferences</p> <p>Notable is the publication timeline of the Strategic Environmental Assessment (SEA) for the Hungerford Neighbourhood Plan in Feb 2024 after the Development Site Options Informal Consultation, therefore undermining the proposal put forward in the plan. This biased the outcome in that a report was then commissioned to support a conclusion that the council had already made.</p> <p>The report does not highlight the short-comings in the previous assessments of previous allocation reports, most notable Hungerford Neighbourhood Plan Site Assessment Report (November 2023), which precludes various sites for inconsistent and arbitrary reasons, and digging back to Appendix A or B (depending how it is referenced, undermines the whole proposals put forward:</p> <p>Not all sites are clearly listed as to why they have been discounted. For example, HUN9 is missing, however the assessment of HUN8 suggests that HUN9 is not being developed because HUN9 is currently an allotment. There is no obvious assessment of the site. <b>However, it is evident the ownership of the allotment site and the influence that is being placed on the authors of this report</b></p> <p><b>The</b> assessment document of HUN7 is based on 39 dwellings, however all consultation documents since then have uplifted that number to 44. Therefore, the review of the site should be based on 39 houses or should be retaken to 44. OR if it isn't to be reassessed then the draft plan does not meet its own objective of The Neighbourhood Plan has to allocate sites to deliver a minimum of 55 dwellings as co-incidentally the increase to 44 pushes the total to 56 therefore just exceeding the threshold of 56 dwellings.</p> <p>HUN7 is a site that could itself physically contain over 55 houses, if that were the case then achieving the required 55 houses then it would be required to have further natural England assessments undertaken, however as they have scaled that back to 44 or 39 houses(?) it side-swerves those requirements and this is only the case as the site contains a flood plain.</p> <p>Therefore Natural England should be consulted on this site.</p>		<p>The process of assessing and presenting the sites is considered to be fair and balanced. The SEA assesses the environmental impacts of all the policies in the Neighbourhood Plan, including the site allocations. It also assesses reasonable alternatives as it is required to do.</p>	
	<p>The assessment of HUN7 clearly highlights the angle of the current field, the draft plan appears to attempt to mitigate it through SUDS however the current field acts like a sponge, developing the site would be put an unacceptable burden on the adjacent industrial site and existing housing, whose flood risk would become unacceptable and would increase insurance premiums on them this is not assessed or considered in the report.</p> <p>The varying environmental reports commissioned by the council do not correlate with their objective RAG (Red Amber Green) status outcome. As an example HUN7 falls within a priority habitat area (fig 4.3 of Strategic Environmental Assessment (SEA) for the Hungerford Neighbourhood Plan) 5.1 of the same report shows how HUN7 also has Flood Zone 3 passing through it and would require significant review, whereas other sites, especially to the south of the town do not. Due to climate change, extreme rain and flooding must be considered and SUDS is a polite way of saying a bit of grass to absorb water. In proposing HUN7 the council has failed demonstrate how the increased run off will be mitigated without creating a flood at the bottom. Their own figure 5.2 shows how the industrial estate (a key employment zone as highlighted in their own draft plan) is due to be sacrificed for the new housing proposal</p> <p>Another example of the poor quality of the assessment of sites is the inconsistency, for example HUN12 was discounted in part due to Significant constraints identified, including isolated location on the edge of the town into the open countryside, distant from services/ facilities however it is further from more facilities than HUN14. This demonstrates further how as statistical variance of 6% based on information presented in a confusing way to residents should be discounted.</p> <p>6.9 of the Strategic Environmental Assessment (SEA) for the Hungerford Neighbourhood Plan indicates that somehow developing HUN7 will increase biodiversity. It would remove space for group of deers that regularly inhabit the field are they going to be replaced with pot plants? It is also notable that recently the field has been used to wild flower growth and therefore the removal of the field would significantly reduce the biodiversity.</p> <p>6.14 outlines the flood risk of HUN7 yet seems to ignore that there are signs of already localised flooding even without the development of a site that is over 10 degrees and is within a floodplain yet is still favourably ranked 2. This is outlined in 9.9 onwards with no clear mitigation in place and is in stark contrast to the own objectives that the plan seeks to achieve in recognising and mitigating against climate change.</p> <p>Further evidence of the bias in the environmental report where two sites are equally scored yet the town council preferred option is ranked 1 in 6.28. what it fails to take into account is that the fields adjacent to HUN7 are still actively farmed and therefore HUN7 could be as well, however the current ownership is discouraged to do so, so that the land is not seen as an active agricultural site. Note that the table above 6.32 (the tables aren't individually numbered) shows than an equal ranking is possible, most notably when site HUN14 does not conform with the councils desired outcome. 6.35 shows how HUN14 is less detrimental than HUN7. 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. 6.38 goes on. In this respect higher growth options could be seen to perform better therefore indicating that Hun14 is actually a better outcome and therefore should be ranked 1</p>		<p>Whilst the comments are acknowledged, WBC Drainage team has not objected to the proposals.</p> <p>6.9 - National policy requires all development to achieve a net gain in biodiversity of at least 10%.</p>	
	<p>- Transport 6.40 indicates that HUN7 is aligned with a cycle route (a road?) which also passes outside all other sites. However, what it doesn't take to into consideration is the significant detrimental impact to existing road users and residents along church street and smitham bridge road. An increase in dwellings will put undue pressure on a road, whereas HUN14 is already on a main arterial route. This is not considered in the scoring</p> <p>‘- 7.30 makes again reference to retention of allotments but this confuses sites as these aren't being assessed here and have been inadvertently discounted although other sites could be provided. As an example HUN9 which is flat could be redeveloped and HUN7 be made into allotments and due to its natural slope would be more suitable for this purpose</p> <p>‘- The overall objectivity of the environmental report would have been better served if the authors had not been privy to the outcome of the informal survey, however it is clear that their outcome has been weighted to support these interests. The same level of assessment should be carried out on all previously discounted sites</p> <p>‘- 7.5 of the draft plan and most notably iv. Discourage goods vehicle and rat-running traffic from unsuitable country lane would also count against HUN7 as it would encourage a great use of North Standen Road into Hungerford which is already unsuitable for heavy traffic</p> <p>‘- Overall the draft plan and most notably the housing proposal fails to meet its own objective Objective S: Encourage new development to maximise the protection and enhancement of biodiversity</p> <p>It would be useful to understand wider influence being put on the authors of this report and how those seeking to benefit (notably landowners) have been consulted or engaged or have supported the production of the report. Developers have clearly been engaged as they have been invited to show what developments could look like on specific sites. Why not all sites, how were these developers engaged and where are the minutes of these meetings?</p> <p>The selection of land seems to self-serve interest, although it can be read as a positive intention of Objective P: Protect the landscape around Hungerford and Action A Support the charities and agencies which are responsible for the conservation of the landscape around Hungerford. It is noticeable that potentially developable land is owned by a charity (i.e. Town and Manor) and that no development is proposed in anyway near these parcels of land, whether they are available or not. It would be useful to see the influence that Town and Manor have implied onto the town council in the production of this report.</p> <p>In summary this report is woefully inadequate and falls shorts on multiple fronts, most notably the housing proposals. The council should consider whether it has the capability and capacity to undertake such a complex piece of work.</p>		<p>Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p>	
Newbury Town Council	<p>Newbury Town Council Planning &amp; Highways Committee Members Response:</p> <p>Members would like to make comment in relation to the sustainable building practices, which are mentioned in the Climate Change and Biodiversity section (Objectives R,S &amp; T). However, members felt that it might also be useful to mentioned sustainable building practices in the section on Building (Objectives A,B &amp; C) as well. Additionally, members commented on how well the document was done overall.</p>		<p>Noted. It is felt that, for ease, reference to a policy matter should be kept in one particular area. This avoids duplication of policy wording.</p>	
Resident	<p>10.2 Land at Smitham Bridge Road. Development of HUN7 will increase light pollution in the area with a negative effect on wildlife. 10.4 and HUNG12 (e): Vehicular access to North Standen Road. The development of HUN7 will increase traffic along North Standen Road and Smitham Bridge Road. Traffic into Hungerford along Smitham Bridge Road passes through a section of road that narrows to a single track road at the transition to Church Street, which is a bottleneck for traffic. Increased traffic along here due to the development of HUN7 will lead to increased congestion which is very undesirable. North Standen Road is a small single track road and increased traffic along here will also significantly increase congestion. The assessment of vehicular access to HUN7 completely misses the fact that these roads are not suited for an increased volume of traffic due to these aspects.</p>	<p>Transportation 6.40</p> <p>For HUN7, traffic into the town along Smitham Bridge Road passes through a section of road that narrows to a single track road at the transition to Church Street, which is a bottleneck for traffic. Increased traffic along here due to the development of HUN7 will lead to increased congestion which is very undesirable.</p> <p>North Standen Road is a small single track road and increased traffic along here will also significantly increase congestion.</p> <p>The assessment appears to miss the fact that these roads are not suited for an increased volume of traffic due to these aspects.</p> <p>Although the site identified by option 2 (HUN20), along Salisbury Road is slightly further from the centre, the A338 which would serve this development is a much better suited road due to its larger size.</p>	<p>Light pollution - development will be required to minimise light pollution.</p> <p>Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p>	

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Resident	<p>I believe there are a number of areas where the Housing Mix needs improvement: for instance, the number of unoccupied bedrooms (4.4) in a house does not take into account houses where a bedroom has been converted into workspace, which is increasing likely after the shift towards home working that started with COVID. There may also be a number of reasons where an extra bedroom is used occasionally or often in households where someone has specific needs or medical issues.</p> <p>Regarding the location of new housing in the Smitham Bridge Road area: I think this is probably the worst place in town for 44 or more new houses. Traffic down Smitham Bridge Road and Church Way is already dangerous, with the size of lorries going to the industrial area, and access onto the High St is difficult due to priority from the right at the mini roundabout. Smitham Bridge Road is regularly flooded both with rainwater and sewage coming up from the drains, and will only get worse if the field is built on. The site is on a hill, so light and noise pollution from the new houses will have a negative impact on all the houses surrounding it.</p> <p>The plan also mentions (10.2) the site would need screening to minimise the visual impact of the neighbouring commercial uses. Over the years, some of the trees providing screening on the other side have fallen down, and recently the landowner had most of the rest cut down, so the noise, light and exhaust from the factories is worse than ever. If the plan is concerned to screen new builds, why have the council shown no interest at all in protecting the residential area east of the factories?</p>		<p>Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p> <p>Issues regarding loss of existing screening of the industrial estate should be raised directly with HTC.</p>	
Swifts Local Network: Swifts & Planning Group	<p>Paragraph 9.9 and Policy HUNG11 are very welcome for their support of swifts, especially as swifts and swift bricks are overlooked by the DEFRA biodiversity net gain metric so do need their own clear policy, but some additional detail and greater consistency in terminology is required for effective implementation.</p> <p>In particular there is no reference to best-practice guidance such as BS 42021:2022 and CIEEM (<a href="https://cieem.net/resource/the-swift-a-bird-you-need-to-help/">https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</a>) to ensure a suitable number of swift bricks in appropriate locations, and whilst HUNG11 refers to "swift bricks", paragraph 9.9 refers to "integrated bird boxes" and "artificial nest sites" which is less helpful because: only swift bricks meet BS 42021 as these allow all small bird species to safely use them - swifts can become trapped inside starling bricks for example; swift bricks are a universal nest brick for small bird species (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: <a href="https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf">https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf</a>); and swift bricks are the only type of bird brick mentioned in National Planning Policy Guidance (Natural Environment 2019 paragraph 023).</p> <p>There is a typo "roosing" rather than "roosting" in the first bullet-point of 9.9, but as swift bricks are for nesting this is maybe not the best word to use here. Finally there is no reference to protection of existing nest sites.</p> <p>Please amend 9.9 first bullet-point to state: "Integral swift bricks and bat boxes under the eaves of the new houses, or sited in other locations away from windows and doors, can create vital new nesting and roosting sites to support populations of birds and bats. Hungerford has a long tradition of swifts in the town during the summer and support of this population with more swift bricks would be welcomed. Swift bricks are also considered a universal nest brick for small bird species. Swift bricks should be installed in new developments including extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM which require at least one swift brick per home on average for each development. Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in the area return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected."</p>		Noted and agreed	Amend HUNG11 and supporting text regarding swift bricks.
Resident	The need for further housing is understood, however the location of site at North Standen road is of great concern and I see no plans that give me confidence of credibly protecting and managing the significant traffic increase this would bring to a low traffic area, it is not a main artery in and out of Hungerford and should not be considered as such. 30% of the proposed volume of 44 houses would be more acceptable in terms of impact to ecological, traffic, impact to locals, pressure on an already congested surgery, in the region of 10-12 houses but with the same conditions for uplift and protection of the local environment, upgrade to sewage systems, <b>traffic improvement and handover of allotments to the local council</b>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident	Fully support the wetland nature reserve project. Support HUNG12 and 13 housing proposal as feel this will least impact countryside /views on arrival into Hungerford and will have less impact on traffic through Hungerford.		Noted	
Resident	<p>We would like to start by congratulating Hungerford Town Council and the volunteer participants in the Neighbourhood Plan development for reaching this major milestone in the process.</p> <p>Our specific observations and comments on the draft plan are as follows.</p> <p>Re Figure 2.1 comparing Hungerford residents age profile in the 2011 and 2021 census and section 2.3 Issues and challenges.</p> <p>The loss of residents in the 35-49 age group is very similar in scale to the increase in the 65-84 age group. This significant shift continues an established previous pattern in the area which I don't think bodes well for the town. The HNP housing policies don't seem to attempt to address the issue and in fact, with the emphasis and focus on 2-bed dwellings, seem likely to accentuate the age imbalances.</p> <p>Potential consequences are a continuing decline in middle-aged residents able and willing to be active participants in the varied and popular clubs, societies and other civil society groups and a shortfall of families with school age children in the town. Section 6.16 and 6.17 of the SEA also highlights these benefits in terms of the vitality of Hungerford and the additional amenities possible through CIL contributions.</p> <p>Policy HUNG2 Design and Character, part B, d. Re parking standards. As the rural western extremity of West Berkshire, Hungerford's car usage is likely to be somewhat higher than the average for the District and potentially needs a higher quantity of parking spaces than the District as a whole. As a new residential area of the town, perhaps the Lancaster Gate development should be surveyed to assess the levels of car ownership and the adequacy of current District standards for Hungerford.</p> <p>Section 9.9 there is a typo - roosing bricks.</p> <p>Policy HUNG10 - we agree with the SEA recommendation to include EV Charging infrastructure.</p> <p>Section 10.1 The housing requirement assigned to be allocated by WBC in Hungerford's Neighbourhood Plan was for a minimum of 55 dwellings but with allocations of just 56 in the plan has been taken as all that is actually needed by the town despite clear shortages in the market of both owner-occupier and rental properties leading to high, often unaffordable prices. This may well be part of the reason for the loss of the 35-49 age group starkly illustrated by the 2021 census.</p> <p>By aiming purely to meet the minimum allocated dwellings number, the plan does not sufficiently address the town's actual dwelling needs, only the apparently arbitrary minimum requested by WBC, the justification for which has not been disclosed as far as we are aware.</p>		<p>HUNG2 - Parking standards are set by West Berkshire Council - they are not a matter that the Neighbourhood Plan can set alternative standards for.</p> <p>Section 10.1 - At the sites consultation in November 2023, the option of allocating a higher number of dwellings across more sites was put to the community and was not supported.</p>	
	<p>Policy HUNG12 Smitham Bridge Road site.</p> <p><b>It is surprising that no mention is made in the site allocation policy details of the agreement we understand has been made with HTC re the commitment to pass the Marsh Lane allotment site in perpetuity to the Town Council's control. If such an agreement has been made should it not be explicit in the HUNG12 allocation policy in case of any changes in ownership or development options occurring before development takes place?</b></p> <p>Notwithstanding this point, we are very much in favour of this site due to the minimal landscape impact and that it will potentially be a very pleasant residential environment with level and easy access to the town centre plus it would resolve the long-standing Marsh Lane allotments uncertainty. The only drawback is the distance to the town's primary and secondary schools.</p> <p>Policy HUNG13 North of Cottrell Close site.</p> <p>Unlike the HUNG12 site, we feel this site will be particularly unattractive as a place to live. It is effectively disconnected from all the town's facilities and amenities by the trunk roads between it and the town (A4 and A338). We also think it will be very difficult to enforce the dwelling size mix and market/affordable split due to the sites small size of up to 12 dwellings. This may be too easily demonstrated to not be economically viable for the developer after it has been allocated. The site's only attraction appears to be as a way of conveniently meeting the minimum dwelling requirement when taken together with the HUNG12 site allocation.</p> <p>Rather than allocating the Cottrell Close site, we feel the town's actual needs would be far better met by allocating the currently unused and vacant extension to the Lancaster Gate site (aka HUN14) which is well screened from the wider landscape and very well located for the Primary and Secondary schools. Together with the HUNG12 site this could provide around 100 additional dwellings of which 40 would be affordable and on this scale developer viability arguments should be easily dismissed allowing the intended size mix and tenures to be achieved. Whilst the preferred option A of the informal public consultation included the Cottrell Close site with 47+65 responses, 62+65 responses preferred options which included HUN14 (Salisbury Road). Given that the total number of respondents on the informal consultation in represented at best (if they were all couples and there were no duplicate submissions) 8.2% of the town's 2021 population, deciding the HNP site allocations around the preferences of 2.2% seems inconclusive.</p>		<p>The solicitors of the developer with an option on the land at Smitham Bridge Road have written to HTC to confirm that, in the event that they submit a planning application, this will provide for the permanent retention of the Marsh Lane allotments. The planning application shall also include the mechanism for securing the permanent retention of the allotments (either through a S106 Agreement or land transfer or both).</p>	

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Resident PHOTOS SUPPLIED	<p>P59 10.4 I object to building on land at Smitham Bridge Road.As noted in the proposal of the need to control the traffic when in construction of the land at Smitham Bridge Road, due to it being a very narrow road in parts - how can you ever plan to control the significant increase of traffic by adding a further minimum of 44 houses on this site? When you have increased the traffic considerably more than it would be when the site is under construction i.e. as many as 80+ more cars per day will be using the narrow roads at North Standen Road, Smitham Bridge Road &amp; Church Street.Note that this is one of the main reasons I do not believe that this is a suitable site when North Standen Road, Smitham Bridge Road and Church Street are already problematic with traffic.These roads are narrow and in the most part single track roads where two cars cannot pass. There is also a trig in the road on Smitham Bridge Road (adjacent to Church Way) where two cars cannot pass and is already dangerous.There will also be traffic congestion on Church Street as it adjoins Hungerford High Street in peak periods such as rush hour and schools start &amp; finish times.</p> <p>P58 10.3 I object to building on land at Smitham Bridge Road. By building a minimum of 44 houses on the upside of the stream and removing the ability of the rainfall to soak into the ground above, where the new houses are to be built, this will increase the amount and the speed of which the water will reach the stream, and will significantly increase the risk of flooding. This is most likely to happen downstream as has occurred before when the play area flooded along with the houses downstream and removing the ability of the rainfall to soak into the ground above, where the new houses are to be built, this will increase the amount and the speed of which the water will reach the stream, and will significantly increase the risk of flooding. This is most likely to happen downstream as has occurred before when the play area flooded along with the houses downstream, Smitham Bridge Road itself and the industrial estate. Please see pictures enclosed.</p> <p>SEA AECOM iii I object to the proposed housing development on the Land at Smitham Bridge Road because more suitable sites were put forward by HTC. I think a much better site would be Option 2, the Land at Salisbury Road as detailed in the SEA - AECOM iii - it is nearer to the schools, is not prone to flooding or likely to increase the risk of flooding to other properties and would not cause any significant traffic issues. It would also minimise the impact on Hungerford Town in school pick up and drop off times and rush hour. The land at Salisbury Road also allows for future housing development when the current infrastructure has been upgraded. It also allows for additional allotments within the town. It makes no sense to me how you have concluded to choose Land at Smitham Bridge Road, over and above Salisbury Road.</p> <p>Pg14 3.2 The Hungerford Town Plan states in its objectives that new housing should complement the countryside surrounding it but the proposal on pages 58 &amp; 59-paragraphs 10.1-10.6 to build on Land at Smitham Bridge Road does not take into account that the land is in a designated area of natural beauty. I also know that the Land at Smitham Bridge Road was put forward for building houses before and West Berkshire County Council rejected this site as unsuitable for housing for a number of different reasons - so why are HTC proposing this site is suitable?</p>	<p>Comments on the Strategic Environmental Assessment</p> <p>6.22 Community Wellbeing</p> <p>Option 1 Land at Smitham Bridge Road ranked worst of all the 5 options. It scored 5, worst of all the other housing development options. With this being such a key factor for the whole community's well-being, why has HTC chosen Option 1? Option 2 Land at Salisbury Road was the best scoring and should be chosen for the new housing.</p> <p>6.45 and table 6.1 Conclusions of the SEA</p> <p>Option 2 overall-Land at Salisbury Road, had the best overall scoring on the whole report-not Option 1-Land at Smitham Bridge Road, so why have you chosen Option 1?</p> <p>9.41 Landscaping.</p> <p>The SEA states that vehicular access to Option 1 is via North Standen Road. It also states this is an identified gateway into the Town yet this road is about two-miles plus of single-track road, definitely unsuitable as an access to a housing estate. My personal opinion is that this is "a joke" that you would suggest this is a suitable access road and a gateway to Hungerford town. Option 2-Land at Salisbury Road is a much better option with good vehicular access of the main A338 road.</p> <p>11. Under Next Steps of the SEA you state that you will need over 50% of approval when holding a proper referendum to all Hungerford residents to be able to put the Plan forward for approval.</p> <p>7.1 to 7.7 Table 7.1 So, therefore, why did you decide to put forward the most critical part of the Neighbourhood Plan i.e. new housing based on only 4% of the towns' population input at discussion stages? This is unfair</p> <p>Only 243 people voted from a population of 5864. Every resident should have been sent a letter allowing them to choose from the 5 options. The majority of the Hungerford town population were not made aware of the previous discussion stages and also, they were not made aware of how important the November 2023 discussions were. If the Neighbourhood Plan goes forward to a Referendum, the HTC should list all of the 5 Options for local people to vote for.</p> <p>Additional comments please for my response to the town plan consultation. Another reason why land at Smitham bridge road is unsuitable for development.</p>	<p>Whilst the comments are acknowledged, WBC Highways Development Management and Drainage teams have not objected to the proposals.</p>	
Resident	<p>10 Hun7 10.2 10.3</p> <p>My objection to plan to Smitham Bridge Road is :-</p> <p>The River Shalbourne has a high risk of flooding.</p> <p>Difficulty insuring properties</p> <p>From industrial estate to the fire station is a single track road due to cars parked on side of the road at Smitham Bridge Rd and Church St.</p> <p>On Smitham Bridge there are two very dangerous points, one at Parsonage Lane and one at Church Way, one onto Smitham Bridge Rd. Both are blind spots.</p>		<p>Whilst the comments are acknowledged, WBC Highways Development Management and Drainage teams have not objected to the proposals.</p>	
Resident	<p>Page 58 /59 Hung12 LWould like to propose that there should be a preservation order on the woodland round the edge of proposed Hung 7.</p>			
Resident	<p>plan page number 58-66 paragraph or policy number 10</p> <p>High st to Smitham bridge/industrial estate very high hgv usage unsuitable for housing River Shalbourne chalk stream not suitable for housing-flood plain Blind spots when emerging from parsonage lane and church way. Danger to wild life habitat reduced single track road due to vehicles parked at road side Parking poor for surgery and st lawrence church Blind spot turning left when emerging from croft to church st.</p>		<p>Whilst the comments are acknowledged, WBC Highways Development Management and Drainage teams have not objected to the proposals.</p>	
Resident	<p>Pg26 para/policy no.6.3 What does make visitors stay longer mean? If it's a couple of additional hours then make parking easy and affordable.</p> <p>Pg52 para/policy no. 8.20/8.21 As SEND needs have increased and there are more EHCP's than ever, is there a need for more specialist schooling in the area?</p> <p>Pg53 para/policy no: 9.3 Whilst not exactly relating to this point where in the infrastructure is larger or additional pumping stations to ensure flooding and associated sewage is not problem. The developer should have conditions dependent on this being in place.</p> <p>Pg60 para/policy no: 10.8 All roads used by construction traffic to be renewed at the developers cost.</p>		<p>Para 6.3. These matters are being considered by the Town Centre Strategy which is a separate document.</p> <p>Para 8.20. SEND needs is a matter addressed by West Berkshire Council as education authority.</p> <p>Para 9.3. Thames Water has indicated there is no need to increase sewerage capacity.</p> <p>Para 10.8. This is a standard requirement already through conditions attached to any planning permission.</p>	
Resident	<p>Plan page number 58 Paragraph or policy number 10.1, 10.4</p> <p>I live on Church Street and it is already very busy with traffic with cars going fast up and down the road all day especially in the morning and afternoon. It creates a lot of noise pollution and is dangerous when I am walking my daughter to the Croft nursery. More houses on North Standen Road will only make this worse with additional traffic, as well years of lorries and water traffic. What provisions will be made to ease traffic or reduce it? Does there not exist alternative sites with better road access? I am against the development here.</p>		<p>Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p>	
Resident	<p>I congratulate the NP Team in producing a detailed evaluation of possible opportunities to "grow" the town for the benefit of future generations. However, I am surprised that while it encapsulates issues centered on the town area, there is no evidence of any consideration being given to nearby locations that could also be available to support local growth.</p> <p>Hungerford Newtown is a prime example where significant housing development would take advantage of proximity to the M4 and meet many of the needs of Hungerford Town.</p> <p>While the narrative mention is made of the limited parking available in Town especially on Market Day, I could not see any possible resolution. I suggest that serious consideration be given to enlarging the Car Park capacity in Church Street with the construction of a multi-storey facility. This could be built by incorporating electrical charging points throughout.</p> <p>Funding options should be explored with both WBC and Berks. Local Enterprise Partnership that produced several Million £'s for the Newbury Rail Station project.</p> <p>Housing</p> <p>I note that the NP discounts any further expansion of the Lancaster Park development despite the avowed intent of Bewley Homes to build another 100 houses on the land so carefully landscaped in preparation for such a development.</p> <p>The Smitham Bridge Road site has been considered before and I believe has been offered for development by the owner and could be extended beyond the level currently in the NP.</p> <p>Cottrell Close Site</p> <p>As a resident in this location, I have a personal interest and concern that whilst some small-scale development might be possible say 4-6 houses, the suggestion to place a minimum of 12 homes is totally impractical and potentially dangerous.</p> <p>Access to the site is via an extremely narrow wooded strip of land which proved too difficult for a heavy-duty machine to navigate on behalf of a resident in Wantage Road requiring the extraction of excess material from their garden. Thus the proposed development would be incompatible with safety and infrastructure concerns.</p> <p>Furthermore, opposition to this site being developed bears a major objection that was one of the factors that resulted in the proposed development of Folly Dog Field being declined by WBC as it would be "overly visible from Hungerford Common".</p>		<p>Cottrell Close - Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p> <p>Brownfield sites - a Call for Sites was put out but no available brownfield sites were put forward for consideration.</p>	

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Resident (LATE RESPONSE) (e)	<p>I am responding to your draft Neighbourhood plan generally, but also to the proposal which includes a proposed development of 44 dwellings adjoining the industrial estate in Smitham Bridge Road( designated as HUN 7).</p> <p>I have been a resident living in Smitham Bridge Road for 22 years. During that time any investment in the road infrastructure has been limited except for the Church Street and the Croft. The Industrial estate was also originally earmarked for residential development. This is because the road narrows at the junction with Church Street and Smitham Bridge Road and is unsuitable for existing lorry movements. There is currently a lack of pedestrian safety at this junction, plus the footpath linking Chilton Way has never been maintained properly in the 22+ years I have lived nearby and also fails disability access requirements ( 1996 legislation).</p> <p>The surface of Smitham Bridge Road is in very poor condition and needs substantial repair work which WBC has avoided even though hi- tech machinery was used to up- grade Church Street and of course the Croft a few years ago. This is particularly concerning as Smitham Bridge Road is already affected at some speed by lorry and other commercial vehicles movements plus staff vehicles movements Monday to Friday. There are no speed control measures on this road which is a current problem some exceptions of course on the A4 outside Hungerford and of course Speen.</p> <p>Some industrial units have recently been refurbished causing severe noise and air pollution. Plus, the recently resurfaced industrial parking area with no new soakaway results in water retention after rainfall and also oil, diesel or petrol leakage being washed into the adjoining stream.</p> <p>The adjoining field designated for Housing under HUN 7 comprises 2.78 hectares of land which is currently severely waterlogged and in heavy rainfall water washes down from the hill at the top of the adjoining field. The site is also not a suitable location for a housing development being immediately adjoining an industrial estate. It is hardly a sustainable proposal due to the loss of bio-diversity trees hedging etc. . BNG is an existing requirement for major development i.e. more than 10 dwellings. There are also electric pylons to consider.</p> <p>The mature weeping willow an amazing feature of the public footpath entrance was lopped and partially destroyed by the landowner without consulting neighbours. Any proposed Footpath diversion will be challenged and as you know this will then require Secretary State approval. Again, no answer from the WBC.</p> <p>I have a professional architectural/planning interest in a proposed development at Hungerford station for 9- 1 and 2 bed flats with 2 affordable housing units, which so far has been with WBC Planning for 2.5 years for a decision. Also adjoining this site at the Station, there is an expired permission for a flat scheme which will deliver 30 units. This is currently the subject of a re-submission by the current developer, so there is no need to develop the HUN7 site to meet WBC housing delivery terms.</p> <p>Plus in any event there are other sites already identified in the Draft Neighbourhood Plan which can deliver the total of 55 residential units required by WBC. There are sites in a more urban and sustainable situation in line with NPPF 2023 and Local Plan policy for dwellings which would deliver what the WBC plan requires.</p>		Whilst the comments are acknowledged, WBC Highways Development Management and Drainage teams have not objected to the proposals.	
West Berks Spokes (LATE RESPONSE) (e)	<p>Apologies for contacting you after the closing date for the Neighbourhood Plan, but I hope you will be able to take our comments on board. We just wanted to comment specifically on the cycling aspects.</p> <p>The Plan makes various references to cycling, acknowledging that existing provision is poor, but setting an objective of increasing walking and cycling in the town. It aims to link new and existing parts of the town into a network of safe walking and cycling routes, and identifies seven routes with potential for improvement.</p> <p>While the aspiration to develop walking and cycle routes is to be applauded, many of of the proposed links are not really suitable for cycling, due to inadequate widths/alignments/gradients/steps. Therefore, we would suggest that these be designated solely as walking routes and that a separate network of cycling routes be identified.</p> <p>Realistically, these would need to be on-road, accompanied by appropriate traffic calming measures and they should cater for journeys to key destinations such as the town centre, Charnham Park, secondary school, rail station, etc.. We would be happy to work with you to identify potential improvements.</p> <p>The NDP includes an aspiration for improving the canal towpath, which would be welcomed, but there are issues with width and headroom in places, as well as potential conflict with other towpath users. Early engagement with the Canal and River Trust, Sustrans and the local angling club would be needed to work out if this would be feasible.</p> <p>We hope that you will be able to take these points on board in the final version of your Neighbourhood Plan.</p>		Noted and agreed - new routes will be identified.	Amend HUNG6 and walking/cycling routes.
Resident (e)	<p>We are extremely disappointed that the main site for the additional 44 houses is not going to be the Salisbury Road site. That site is already developed and has the key amenities in place and seems ready to be developed further. The arguments that it is too far from other local facilities does not seem sound when one considers the distance of the Smitham Bridge Road site from the primary and secondary schools. This will almost definitely result in a larger number of journeys each week to ferry children back and forth to school each day than the use of other facilities e.g. shops, doctor, library, etc.</p> <p>The Smitham Bridge road site on the other hand is completely undeveloped and will require extensive work to join it to amenities. As residents of Church Street, we are deeply concerned about the increased amount of traffic for both construction and daily traffic resulting from 44 additional houses.</p> <p>We already have a problem with traffic, particularly with heavy lorries accessing the industrial site on Smitham Bridge road.</p> <p>This extra traffic will seriously impact people living along the roads for the following reasons and increase the risks of living along the route and travelling on foot and by car.</p> <ul style="list-style-type: none"> <li>•The road is not wide enough for much of Church Street for two vehicles to pass each other. Lorries and vans regularly drive on the pavements. An increase in traffic will make this worse.</li> <li>•There is only pavement on one side of the road for the majority of its length from the High Street to the proposed site.</li> <li>•Parking is already limited in this area and further restrictions will make the problem worse.</li> <li>•The cars and vans regularly exceed the speed limits and the frequent obstacles along the route mean that vehicles are constantly accelerating which creates further noise and environmental impact.</li> <li>•There are some pinch points for traffic congestion and concern, especially where cars and vans are parked on the road and at the junction between Church Street, Church Way and Parsonage Lane. It amazes me that there are no serious collisions at that junction.</li> </ul> <p>We are concerned that an increase in traffic will increase:</p> <ul style="list-style-type: none"> <li>•Noise</li> <li>•Pollution</li> <li>•Accidents</li> <li>•Speed</li> <li>•Deterioration of the pavements.</li> </ul> <p>It will have a serious impact on the value and enjoyment of living in this area.</p> <p>I do not believe that the same negative impact will result if the Salisbury Road site were chosen. I also fear that the Salisbury Road site development will take place even if it is not included in the plan.</p>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident (e)	<p>I am a nature and natural landscape lover and I can say that most of my leisure time is taken with the experience of the special rural and protected features of the environment that myself and many of the citizens of Hungerford have come to understand, respect and enjoy. Never more-so than during the recent pandemic when the public buildings, Churches, gyms, shops, entertainment premises, restaurants and cafes, hairdressers were all closed in this town and country wide. The redeeming fact of that dark time for me was the direct connection to nature afforded by the natural landscape on the doorstep of Hungerford. The immediacy of the beautiful landscape, woodland, farmland and the rural feel of the cloistered North Standon direction winding single track road, with the sense of peace that comes from an idyllic rural landscape.</p> <p>Hungerford offers leisure walkers and tourists particularly that immediate sense of release of the pressures of life by the direct connection by foot into the surrounding countryside in the abundance of circular walks that are an escape from the influence of urban confines with the undisturbed and uninterrupted visual space across open farmland.</p> <p>In my view, the countryside is the jewel of this small market town and the reason Hungerford has so much appeal as the place to escape the overcrowded hubbub of developing commercial centres of major conurbations such as Newbury/Thatcham and Reading to the East. And Swindon to the West.</p> <p>The quality of the environment directly affects the quality of the ecosystems for humans to encounter the landscape and wildlife, and the space that wildlife itself needs to flourish. Too much human encroachment upsets the environment for wildlife to flourish, and wildlife needs the expansive environment.</p> <p>I have read the published consultation on the proposals for allowing further urbanisation of the immediate environs of Hungerford. I cannot in principle express my own approval of expansion and urban housing development in the North Standon direction for housing because of the immediate and permanent effect of two years disruption from building works and HGV movement in the town. The Smitham Bridge Road from Church Street is not a common gateway in and out of Hungerford as the SEA plan suggests since the traffic is heading towards the motorway and eastwards towards Newbury and the A338.</p> <p>The SEA makes several false assertions, about the frequency and quality of public transport and makes unintelligible remarks about the level of commerce and industry in the town itself. Referring the existing industry and employment opportunity as justification for the proposed development of 44 or more houses. No qualified Town Planner would accede the housing need without the commercial direction of the area being the factual basis for the expansion of the town by way of residential accommodation. There are not the immediate employment opportunities for young school leavers and the existing commercial activity in the town does not support the demand. The criteria for extra residential property on the basis of commercial growth and the availability of employment is not met.</p>		The process of assessing and presenting the sites is considered to be fair and balanced. The SEA assesses the environmental impacts of all the policies in the Neighbourhood Plan, including the site allocations. It also assesses reasonable alternatives as it is required to do.	

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	<p>The outline of the plan also fails to address the real demographic need of Hungerford and its proportionally higher than West Berks ageing population and need for single occupancy housing. For the matter of any location for a housing project the vague terms of the general mix of housing is point in question as to the competency of the project idea to begin. The standard 10% mark for social housing falls well below the need for the type of social housing and demographic need which I would rate as 50% or higher with the need for social sheltered housing, affordable rents and below current market price retirement flats.</p> <p>The rise of online purchasing for any household goods, home delivery of weekly supermarket shopping, these both directly factor the reality whether a development would benefit the town centre in a couple of years after such a proposed development were finished, in positive way increasing its foot fall. The town is visited by neighbouring towns which increase the footfall in the town on weekends. Events in Hungerford are initiatives that if orchestrated could make Hungerford more culturally interesting without the need for upsetting the ecology of the immediate environs of the town by the addition of ideas that fall short of the test for need for further and pertinent housing development.</p> <p>In consulting in conversation with many residents on my daily health walks, I would conclude that preference by Hungerford residents settles on expansion approval for the A4 and on the A338, but most are upset at the lack of understanding of the improper assertion the Smithham Bridge proposed site is a suitable development for the Town we call home.</p>		<p>The requirement to allocate sites for a minimum of 55 dwellings is established by the West Berkshire emerging Local Plan. If these allocations are not made in the Neighbourhood Plan then West Berkshire Council will do it through its Local Plan.</p>	
Natural England (e)	<p>Many thanks for consulting Natural England regarding the proposed Hungerford neighbourhood plan.</p> <p>Having previously commented on the additional allocations that were submitted for the plan area, one of which has been included in the regulation 14 pre-submission version, we wouldn't have any further comments to make.</p> <p>The two proposed sites should be sustainable development locations with fewer issues to address regarding impacts on designated sites given they are set away from these locations although the northern allocation is a bit closer to the Kennet &amp; Lambourn Floodplain (SAC) and Kennet and Lambourn Floodplain SSSI.</p> <p>The proposals within the plan document include good policies for the two allocated sites (HUNG12 &amp; 13) which should result in well designed and developed proposals for those locations which would fit in and create an overall beneficial result once developed.</p> <p>Policies 6, 8 and 11 of the neighbourhood plan do also form a strong basis on which to assess development that comes forward and ensure it doesn't result in hard to designated sites and overdevelopment of the local area.</p> <p>The SEA as produced by AECOM sets out some good suggestions in the conclusion (section 10.7 to 10.12) which we would agree with and should be considered before final submission version is drafted.</p>		<p>Noted</p>	<p>Amend Plan as per recommendations in the SEA .</p>
Resident (e)	<p>I am writing to offer my insights regarding the draft Hungerford Neighbourhood Development Plan (NDP), specifically concerning the proposed construction of 12 houses on land North of Cottrell Close (Options A and C). I firmly advocate against building any houses on this land for the following reasons:</p> <p>1.1. Historical Position of Hungerford Town Council (HTC): Referring to application no. 00/01335/FUL, dated 24/11/2000, where HTC expressed concerns about building on the current site of Cottrell Close, recommending a density of 20 dwellings for a more harmonious development. HTC also highlighted significant apprehensions regarding access, suggesting the construction of a roundabout at the site entrance, which remains unresolved.</p> <p>2.□</p> <p>2. Access Concerns: The proposed additional 12 houses would exacerbate existing access issues, particularly concerning traffic flow onto the A4. HTC's recommendation for a roundabout remains pertinent, yet it is uncertain whether National Transport Authorities would approve such a measure.</p> <p>3.□</p> <p>3. Thames Water's Position: Thames Water's comments on a Planning Application in December 2009 highlighted existing inadequacies in waste water infrastructure and surface water drainage. Adding 12 houses could strain the already burdened sewage system and exacerbate issues such as soil creep and foundation stability.</p> <p>4.4. Environmental Considerations: The Newbury and Hungerford Campaign to Protect Rural England (CPRE) emphasized sustainable development principles and prioritised the protection of the environment. Building on greenfield sites contradicts these principles, and the proposed development would disrupt scenic views and natural habitats.</p> <p>5.5. Impact on Hungerford Common: Development above the 125-meter contour line would compromise the scenic view from Hungerford Common, with potential adverse effects on local biodiversity. Existing screening measures are inadequate, and the presence of Leylandi trees, not native to the area, further diminishes environmental integrity.</p> <p>6.6. Development Site Selection: Discrepancies in public opinion regarding preferred development options underscore the need for thorough evaluation. Given the existing infrastructure and amenities, the current house building program off Salisbury Road appears more suitable for accommodating new housing developments.</p> <p>7.7. Construction Impact on Local Residents: Construction activities would pose significant challenges, including increased traffic congestion, safety hazards for pedestrians, and potential damage to road infrastructure. The proposed development area lacks adequate infrastructure to support construction activities without disrupting the tranquility of the neighborhood.</p> <p>In conclusion, I strongly urge the Town Council to reconsider the proposal to build houses on the land North of Cottrell Close. Instead, I propose exploring alternative sites with better infrastructure and minimal environmental impact, aligning with principles of sustainable development and community well-being.</p> <p>Thank you for considering these points.</p>		<p>1.1. HTC reserves its position on any detailed planning application where such details can be considered.</p> <p>2. Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p> <p>3. Thames Water has confirmed tht there is sufficient waste water infrastructure to accommodate this development. WBC Drainage team has not objected to the proposals.</p> <p>4.4. The point is noted. However, after 2 Calls for Sites, no available brownfield sites were put forward.</p> <p>5.5. The policy requires the impact on views to be mitigated.</p> <p>6.6. The site selection process needs to consider a wide range of factors, of which public opinion is just one.</p> <p>7.7. Construction impacts will need to be adequately mitigated as part of any planning permission.</p>	
Resident (e)	<p>I refer to the above subject issue and in particular the proposal to build 12 houses north of Cottrell Close.</p> <p>There have been proposals before Cottrell Close was built in 2000 and I remember then that the recommendation was for 20 houses, if fact there are now 35 in a well established and community based cul-de-sac.</p> <p>The additional traffic that would result from the decision to build houses above the current development obviously has a huge impact on the existing road which has areas that would probably not take construction traffic without sinking. The proposed access route is not only impractical as this would have to be widened and impact on existing homeowners land, but from a safety aspect is restrictive for pedestrian use. Also access from the A4 will be a considerable problem and will need extensive development. The problem of having potentially 12+ more cars using a limited access road and cars already needing to park on the road in the Close makes this an untenable approach .</p> <p>To build 12 houses above the current skyline would impact the aesthetic view for sure and create a carbuncle when viewed from the common or indeed the approach to Hungerford from the A4.</p> <p>The conclusion I feel is that the current satellite area of Hungerford recently built on the Salisbury Road far outweighs any piecemeal developments being proposed. The ability to create local amenities in that site and to create the community that compliments the town of Hungerford rather than overwhelm the current infrastructure of doctors and education etc surely must be the emphasis going forward. If development cannot be built on regenerated brown field sites within Hungerford that does not mean massive disruption, surely the need to create a community which can sustain itself and grow into the future needs is the desired approach and the Salisbury Road development area has to be the way for the future</p>		<p>See responses to representations immediately above.</p>	
Resident (e)	<p>I would be grateful if you and the Town Council could consider the following points re the draft Hungerford NDP and specifically to the proposals to build 12 houses on land North of Cottrell Close (Options A and C). I would argue against building any houses on this land and I do for the following reasons:-</p> <p>1)Historical position of Hungerford Town Council(HTC)</p> <p>I refer you to application no 00/01335/FUL dated 24/11/2000 in which HTC commented on the proposal to build on land which is now Cottrell Close. As you know there are now 35 houses in Cottrell Close. In HTC's submission they said, and I quote:-</p> <p>"We believe that a density of 20 dwellings as detailed in the Inspectors report in the West Berkshire Local Plan would offer a more sympathetic development of the site.</p> <p>Access</p> <p>We are very concerned with the proposed access to the site. The combination of accelerating traffic (heading towards Newbury) and traffic both leaving and entering the new development present a very serious and dangerous condition. We would recommend that a roundabout is constructed at the site entrance"</p> <p>Final planning permission was given for 35 houses which have been built. An additional 12 houses bringing the total to 47 houses, would indeed bring the issues re access from the A4 to a head. As recommended by HTC in 2000 it would be essential to build a roundabout on the A4. Whether the National Transport Authorities would agree to this is a very debatable point. I would suggest that they would turn down the proposal.</p> <p>2)Position of Thames Water</p> <p>On the 21st December 2009 Thames Water commented on a Planning Application 09/02450/OUTMAJ re building on land next to Cottrell Close. I quote from the letter:-</p> <p>Re Waste Water Comments; "Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of the application"</p> <p>Re Surface Water Drainage; Concern was expressed in the discharge to public sewers. The situation re sewers in Cottrell Close, at the time of writing, is not a happy one. We have collapsing waste water sewer system in addition to gardens being flooded in the recent past with human waste.</p> <p>The real concern would be that the sewage system would not be able to cope with 12 houses. Furthermore rain water run off down the slope would cause soil creep and undermine the foundations of houses 28-32 Cottrell Close.</p> <p>3. Historical position of Newbury and Hungerford CPRE.</p> <p>In a letter written on 7/1/2010 the Chair of Newbury and Hungerford CPRE wrote and I quote from the letter written to West Berks Council re Application No 09/02450.</p> <p>a)National Governmental over- arching planning policy state that "sustainable development is the core principle underpinning planning and that local authorities should be encouraging patterns of development which reduce the need to travel by private car." This development is too far from Hungerford to be able to access any facilities other than by car, even if walking and cycling facilities were promoted and therefore it is not a sustainable development.</p> <p>b)One of the aims of the sustainable development is "effective protection of the environment" Building approx. 12 houses on an attractive hillside does nothing to protect the environment.</p> <p>c)Priority should be given to the re-use of previously developed brownfield sites in preference to the development of greenfield sites.</p>		<p>See responses to representations immediately above.</p>	

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	<p>4. Building above the 125 meter contour line and destroying the view from Hungerford Common, including the issue of screening. Any proposed development North of Cottrell Close would be above the 125 meter contour line and would destroy the view north from the Downgate entrance to Hungerford Common surely one of the most spectacular views from the Common. To argue that this is well screened is a complete fallacy. In some areas of the northern boundary of Cottrell Close there aren't any trees whereas in others there are Leylandi trees in excess of 2 meters in height. As you know Leylandi trees are completely alien to the North Wessex Downs Area. I refer you to Part 8 of the Anti-Social Behaviour Act 2003 which allows West Berks Council to deal with issues of High Hedges i.e. they should not exceed 2 meters in height. Obviously if the High Hedge legislation is implemented by West Berks Council as it should be as it is an Act of Parliament there will not be an area that is screened to the north of Cottrell Close. 5. Report of Development Site Options Informal Consultation I would dispute your findings that Option A should be the preferred option as Option A had two areas. When only one area was proposed i.e. Option B there was a substantial number in favour i.e.30%. It seems to me self-evident that the current house building programme off the Salisbury Road should be the area for these new houses. 6. Impact on local residents during construction In the consultation document you quote rightly pointed out that this would be an issue.</p> <p>I would like to elaborate on this:- a)I refer to point 1 in my response i.e. construction traffic would cause immense problems coming in and out of Cottrell Close onto the A4. In addition the approach to the building site would entail completely unacceptable levels of traffic in what is a peaceful cul-de-sac. b)I would argue that the road surface to the north of Cottrell Close is in poor condition and would not stand the weight of construction traffic. The proposed entrance is too narrow for pavements and two way road traffic. I concede that you could have single file traffic but a parent pushing a baby in a pram would be in danger if the proposed development went ahead as there wouldn't be room for a road and a pavement therefore is not acceptable.</p>		See responses to representations immediately above.	
Network Rail (e)	<p>Thank you for consulting us on the Hungerford Neighbourhood Development Plan. This email forms the basis of our response.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.</p> <p>Level Crossings Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that they safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.</p> <p>There are 2 level crossings within the plan area that will could be affected:  HungerfordCCTV BHL61.46SU339685RG17 0DX  StandersFootpath crossingBHL62.70SU399682RG17 0SN</p> <p>Network Rail has a strong policy to guide and improve its management of level crossings, which aims to: reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p>		Noted	
Network Rail (e)	<p>Level crossings can be impacted in a variety of ways by planning proposals: •By a proposal being directly next to a level crossing •By the cumulative effect of development added over time •By the type of crossing involved •By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing •By developments that might impede pedestrians ability to hear approaching trains •By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs •By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing •By any development or enhancement of the public rights of way</p> <p>It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.</p> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-</p> <p>•(Schedule 4 (j) of the Town &amp; Country Planning (Development Management Procedure) Order, 2015) requires that "...development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway" (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.</p> <p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p> <p>We trust these comments will be useful in the preparation of the forthcoming plan documents.</p>		Noted	
National Highways (e)	<p>Thank you for your e-mail dated 16 February 2024, consulting us on the above.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M4 motorway.</p>		Noted	
Resident (e)	<p>We have reviewed information available on your planning portal and have 'No Comments'.</p> <p>I am writing to express my deep concern about the above proposed planning for the field opposite the industrial estate.</p> <p>&gt; &gt; I use Smitham Bridge Road several times a day heading both east and west. Even now, the volume of traffic along the road causes blocks to traffic due to the width of the road and the narrowing at Parsonage Lane junction. With the proposed 44+ houses, the increased volume of traffic would create huge difficulties for the residents of Smitham Bridge Road and Church Street. Indeed the view of the road where it narrows and that junction, means vehicles are often committed to travelling forwards in order to see if the area is clear. With increased traffic, this would cause motorists to reverse in order to get out of the inevitable gridlock.</p> <p>&gt; &gt; Furthermore, unless roadside parking along both roads is banned, any vehicles parked there are likely to have damage incurred by frustrated motorists trying to get past each other.</p> <p>&gt; &gt; Finally, the size of the vehicles visiting the industrial estate mean that any increase to the current volume of traffic using the roads would create complete chaos.</p> <p>&gt; &gt; I hope West Berkshire Council's planning department reject this proposal either completely or else reduce the number of planned properties substantially.</p>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident (e)	<p>I am writing to complain about the choice of site for new housing, Church Street is very narrow. Church Way approach to it, is a blind turning! That would be at least 60 to 70 cars more in that built up area. Why are houses not built on the North and West side of Hungerford where access to roads is much easier? From a concerned resident of this beautiful town.</p>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	
Resident (e)	<p>I've reviewed the Draft Hungerford Neighbourhood Plan. I found it to be a well thought out, balanced and extremely well constructed plan with sensible conclusions and recommendations.</p>		Noted	
Resident (e)	<p>A good piece of work. Well done.</p> <p>I understand that the Hungerford draft neighbourhood plan is out for consultation, and closes for comments on Friday 29th March 2024. I also understand that a new housing development for at least 44 houses is proposed on land off Smitham Bridge Road. I would like to question the sense in this, bearing in mind the extra traffic it will obviously generate on Smitham Bridge Road, Church Street and consequently the High Street and the precious small bridge over the Canal. Already there are two new housing developments south of the town off the Salisbury Road, resulting in more traffic passing through the High Street in order to reach the roads arteries of the A4 and M4. More housing, most specifically low-cost housing, is needed everywhere, and Hungerford cannot be an exception when towns have to provide accommodation proportional to their size. However, it would seem obvious to me that such building should be north of the town centre (along the A4 or even up the A338) thereby having greater access to the A4, M4 and even the railway. Has this been considered?</p>		Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.	

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Resident (e)	<p>Hello, I'm writing with regards to the proposed development of 44 houses off Smitham Bridge Road and opposite the industrial estate.</p> <p>I'm very against this area being used due to firstly, our poor nature. There is a little stream that runs behind the industrial estate, then past the children's playground until it joins The Marshes that create our chalk stream area where town commoners are allowed to gather cress.</p> <p>When I was still able to do nature walks, I visited this stream (in itself a chalk stream) and discovered it is a wonderful oasis for wildlife. I've seen kingfishers fishing there as well as the local badgers and deer using it for drinking as it's always been a clean stream. In the field itself, I see deer very often and now that I'm almost housebound, I can see them from my window - just a small little view of nature.</p> <p>If this development goes ahead, it will no doubt kill this stream. We all know that housing developments are one of the worst culprits for polluting surrounding land and waterways. This stream will be terribly polluted, killing the fish in the stream, which could kill the kingfishers who fish there and possibly badgers who might catch fish occasionally. But it will certainly poison the water for all the local wildlife and for some of them this is their only source of clear, running water.</p> <p>Moving further down the stream, children will no longer be able to safely enjoy the small section accessible from the playground. However, far more seriously, this will pollute The Marshes. If our otter friend is still living there, he/she will be affected by either a lot less fish or possibly poisoned by affected fish or from polluted water, in general.</p> <p>There are so many creatures who use this waterway, from beginning to end, as well as the land surrounding it. Rare butterflies, dragonflies, swifts, swallows and house martins, water voles, badgers, otter, deer and herons. I really feel that we've taken so much from them already that surely we should be taking every opportunity to save them?</p> <p>Most people will be against the big increase in traffic but not many will be thinking about how this traffic will be adding to the pollution levels. This affects the humans as well as the wildlife. I already use an air purifier for the pollution (not least the diesel fumes from the train track behind my house) and because my lungs have been weakened by having sepsis twice. Natural land with long existing trees, even if they're not big oaks, is also good at absorbing and dealing with pollution.</p> <p>I believe the very life of The Marshes is at risk if this development is to go ahead.</p> <p>I've looked at maps as I understand that these houses need to go somewhere (although I also feel that we can't increase the size of Hungerford indefinitely) and it seems to make sense to me to use the site next to, and opposite the fairly new development on the A338. There are already roundabouts in place and it's a much bigger road than our little country road as well as there not being any waterways that would be affected as they would be here.</p> <p>I hope my points will be taken into serious consideration as I do believe they are valid.</p>		These points are noted. Any development proposals will be required to fully mitigate any impacts on biodiversity.	
Resident (e)	<p>HUN 14 Should NOT be permitted or even remotely considered. Destruction of the sites' biodiversity is wholly contrary to a broad spread of biodiversity policies covering our Natural Environment in the current West Berkshire Local Plan that seek to preserve and protect the Natural Environment from inappropriate development. This important site forms a Natural Barrier shielding the countryside from existing development. Therefore, it's value in its particular location is properly preserved and protected via West Berkshire planning policy, which must not be flagrantly ignored, by even considering HUN14 for development.</p>		These points are noted. Any development proposals will be required to fully mitigate any impacts on biodiversity.	
Berkshire LEP	Many thanks for sharing the draft Hungerford Neighbourhood Plan with Berkshire LEP. With the changes to LEP accountability introduced by government and transfer of some of the LEP core functions to local government control, effective from 1 April LEPs will no longer be statutory consultees with a Duty to Cooperate regarding planning proposals, as such we will not be responding to this invitation to comment.		Noted	
Office for Nuclear radiation (e)	<p>Please note that ONR's land use planning processes published at <a href="http://www.onr.org.uk/land-use-planning.htm">http://www.onr.org.uk/land-use-planning.htm</a> may apply to some of the developments within the Draft Hungerford Neighbourhood Plan.</p> <p>If you are a Local Authority or neighbourhood with areas that are within an ONR consultation zone please be aware that in order for ONR to have no objections to such developments we will require:</p> <ul style="list-style-type: none"> <li>•confirmation from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and</li> <li>•that the developments do not pose an external hazard to the site.</li> </ul>		Noted	
Resident (e)	<p>Wouk's like to Understand all the access provisions and restrictions.</p> <p>If there is any consideration of using Cottrell Close. It would be a massive issue for residents and the current state of the road structure is poor at best, with drainage collapse under repair</p> <p>Finally are there any proposals re the plan and layout of the proposed development?</p>		Detailed proposals regarding layout and other matters will be a matter for any planning application that is brought forward.	
Exolum Pipeline System Ltd (e) ATTACHMENT	Thank you for your email to Exolum Pipeline System Ltd dated 16.02.2024 regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the Exolum pipeline or alternatively go to <a href="http://www.lsbud.co.uk">www.lsbud.co.uk</a> , our free online enquiry service.		Noted	
Berkshire Gardens Trust (e)	<p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to the Hungerford NDP. The Berkshire Gardens Trust (BGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of historic sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations within Berkshire.</p> <p>The key aims of the Berkshire Gardens Trust (BGT) are to identify, understand, appreciate, and promote the conservation of historically significant designed landscapes in Berkshire whilst enjoying and caring for our park and garden heritage, now and for future generations.</p> <p>We fully support the principles set out in the NDP to protect the historic environment and green spaces. We have noted that Hungerford Parish does not have any of Historic England's Registered Parks and Gardens nor does it include any of the new Locally Listed parks and gardens in the Local Plan. However, we welcome Action B page 11 and encourage the Parish to also identify parks and gardens which may be of local interest and worthy of inclusion in West Berkshire's Local List of Heritage Assets.</p> <p>BGT retains a Depository of public and private parks and gardens that have been identified as having potential historic interest. This list includes gardens at Standen Manor and Chilton Manor. We have yet to research these but they may be worth considering for inclusion in the NDP for their historic interest, as well as others we are not currently aware of. We are pleased to see the inclusion of four Local Green Spaces but it would appear that none of these have particular historic interest which might merit inclusion in our emerging List of Historic Public Parks and Gardens in Berkshire. This list will include both Registered sites and non-designated local assets open to the public. More information can be found on our website <a href="http://www.berkshiregardenstrust.org">www.berkshiregardenstrust.org</a>.</p>		These comments are noted. The Local Green Spaces designated reflect the spaces that the community considers to be special and which require protection from development. Historic Parks and Gardens already are protected by planning policy.	
Marine Management (e)	Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.		Noted	
Planning South Sport England (e)	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p>		Noted	

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Planning South Sport England (e)	<p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <p>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</p>		Noted	
National Gas (e)	<p>National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Gas Transmission</p> <p>National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>Proposed sites crossed or in close proximity to National Gas Transmission assets</p> <p>An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.</p> <p>National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.</p>		Noted	
National Grid (e)	<p>An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure.</p> <p>NGET has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>If you require any further information in respect of this letter, then please contact us.</p>		Noted	
Master land & Planning (e)	<p>Policy HUNG1 Housing Mix</p> <p>Our client is supportive of Policy HUNG1 which seeks to ensure a range of homes are provided.</p> <p>Development of the Land North of Cottrell Close would accord with this policy in so far as it could provide a mix of dwelling sizes, across tenures, with a focus on 2-bed properties as required by paragraph 4.6 of the HNP.</p> <p>The flexibility in the policy is supported as it is noted that other sources of housing may come forward in the future which identify alternative needs or housing mix should be provided.</p> <p>However, there may be other sources of evidence above the West Berkshire Housing Needs Assessment and successor document which can demonstrate a different approach to housing mix is required. This includes an Applicant commissioned report to justify the size and typology 1 Section 41 2 of housing that their scheme seeks to address reflective of the conditions of the local area, for instance:</p> <ul style="list-style-type: none"> <li>•A review of the existing housing stock in the area; and</li> <li>•An assessment of housing demand to identify a local need for housing and an indication of the type of housing that would meet the identified needs. This may be housing that would meet a particular demographic, employment or community need, or the changing housing needs of the area, and</li> </ul> <p>It is therefore recommended the policy text be amended as follows:</p> <p>POLICY HUNG1: HOUSING MIX</p> <p>A. To address the identified housing needs in Hungerford, developments of 5 dwellings or more should provide a mix of dwelling sizes (market and affordable) and types that reflect the requirements of the West Berkshire Strategic Housing Needs Assessment 2022 or, any successor document, or other local evidence.</p> <p>Policy HUNG10: Low energy and energy efficient design</p> <p>We are supportive of policy HUNG10 and the direction of travel to minimise energy consumption and demand. This policy is not prescriptive as to the manner in which low energy and energy efficiency design is to be achieved.</p> <p>Our client is committed to providing an exemplar low carbon development that recognises the energy hierarchy of reducing energy demand in the first instance, through measures such as improving insulation and a fabric first design. Opportunities are then being explored to provide any remaining energy needs through renewable sources such as ground and water source heat pumps.</p>		HUNG1A - agreed.	Amend HUNG1A
Master land & Planning (e)	<p>Policy HUNG13: Land north of Cottrell Close</p> <p>Policy HUNG13 and the allocation of 12 dwellings on Land north of Cottrell Close is supported. The site remains an available, suitable and deliverable location for residential development to make a valuable contribution towards delivering the housing requirement of a minimum of 55 dwellings as identified in the West Berkshire Local Plan Review Submission Version (January 2023).</p> <p>Paragraph 10.7 of the HNP and the first sentence of Policy HUNG13 states the site is 1 hectare. This is incorrect. The site measures approximately 0.55ha and therefore this should be amended.</p> <p>Paragraph 10.8 references the access. The allocation extents should be extended to include the point of vehicular and pedestrian access to Cottrell Close, so that the allocation extends to the public highway.</p> <p>Criterion f) requires provision of a pedestrian connection to the neighbouring cemetery. Opportunities for this have not been explored by the landowner. It is noted that there are a number of reasons why providing a pedestrian connection to the north of this site would be unfavourable, including breaching the established hedgerow, topography of the site, the need for additional lighting, as well as for designing out crime in line with policy HUNG9. The secure by design Homes 2024 guidance highlights that 'leaky cul-de-sacs' which are linked to other development by footpaths can experience the highest levels of crime when compared to those with less permeability. This requirement should therefore be deleted from Criterion f.</p> <p>Criterion h) refers to preserving the setting of the grade II listed building and the Edington Conservation Area. We advise that the site is very well contained by existing vegetation with only limited intervisibility between the listed buildings or Wantage Road. Housing will therefore be delivered in a manner that preserves the significance of the heritage assets. This specific requirement of the policy should be removed, as consideration of any heritage (setting) impacts would be a matter covered by existing development plan policies.</p> <p>I trust these representations will be taken into account by the Town Council.</p>		<p>Para 10.7/HUNG13 - Noted.</p> <p>Para 10.8 and site map/Policies Map - Noted</p> <p>HUNG13f - Noted</p> <p>HUNG13h - disagree. It is important that this is a requirement of a site specific policy where there is an existing heritage feature which could be affected.</p>	<p>Amend para 10.7/HUNG13</p> <p>Amend site map/Policies Map</p> <p>Delete HUNG13f</p>
MOD (e)	<p>It is understood that West Berkshire Council are undertaking a consultation regarding their Hungerford Neighbourhood Development Plan consultation under Regulation 14. This document will be used to determine the outcome of planning applications, include policies for development and the use of land.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.</p> <p>Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.</p> <p>Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to</p> <ul style="list-style-type: none"> <li>o Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.</li> <li>o Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of, or exceeding 2m;</li> <li>o Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft; and</li> <li>o Any development, including changes of use and regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property.</li> </ul> <p>I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.</p>		Noted	

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
NHS Property Services Ltd (e)	<p>NHSPS welcomes the commitment shown in paragraph 2.14 in collaborating with the West Berkshire Rural Primary Care Network to provide better access to health care facilities for the residents of Hungerford. It is hoped that this commitment can continue into the future, working with local councils, primary care networks and the NHS to provide an improved services for local residents.</p> <p>Policy HUNG2 and HUNG9 [Design and Character, Wellbeing and Safety Through Design]</p> <p>Policy HUNG2 and HUNG9 sets out the Council's commitment to making sure that new developments promote healthier lifestyles and improve overall health and wellbeing. NHSPS support the inclusion of policies that support healthy lifestyles. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.</p> <p>However, the polices could go further to promote and address the impact that planning can have on health. As, the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we recommend the inclusion of a comprehensive policy on health and wellbeing in the Neighbourhood Plan, and encourage the Council to engage with the NHS on this matter ahead of the Regulation 19 document being prepared. Specific policy requirements to promote healthy developments should include:</p> <ul style="list-style-type: none"> <li>Proposals should consider local health outcomes, and where appropriate to the local context and/or size of the scheme include a Health Impact Assessment</li> <li>Design schemes should encourage active travel, including through providing safe and attractive walking and cycling routes, and ensuring developments are connected by these routes to local services, employment, leisure, and existing walking and cycling routes.</li> <li>Provide access to healthy foods, including through access to shops and food growing opportunities (allotments and/or providing sufficient garden space)</li> <li>Design schemes in a way that encourages social interaction, including through providing front gardens, and informal meeting spaces including street benches and neighbourhood squares and green spaces.</li> <li>Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design.</li> <li>Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes.</li> <li>Ensure development embraces and respects the context and heritage of the surrounding area.</li> <li>Provide the necessary mix of housing types and affordable housing, reflecting local needs.</li> <li>Provide sufficient and high quality green and blue spaces within developments.</li> </ul>		<p>The plan already contains policies which seek to encourage active travel, specifically cycling and walking. Matters such as access to garden spaces are already covered by existing Local Plan policy. The Plan already has a section on health and wellbeing which encourages communal spaces to be used for community food growing. There is no evidence that planning is a barrier to these things happening. The protection of a number of Local Green Spaces ensures that there are a number of spaces where people can meet. The plan already includes policies which encourage development to be designed in a way that is resilient and adaptable to climate change. It also includes a policy regarding housing mix.</p>	
NHS Property Services Ltd (e)	<p>Policy HUNG1 [Housing Mix]</p> <p>In undertaking further work on local housing needs, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the Neighbourhood Plan area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.</p> <p>Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:</p> <ul style="list-style-type: none"> <li>Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.</li> <li>Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the neighbourhood plan (for example employment or other economic policies).</li> <li>Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.</li> </ul> <p>Conclusion</p> <p>NHSPS thank Hungerford Town Council for the opportunity to comment on the Draft Hungerford Neighbourhood Plan. We trust our comments will be taken into consideration, and we look forwarding to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.</p>		<p>These are strategic matters which are addressed by the West Berkshire Local Plan rather than the neighbourhood plan.</p>	
Historic England (e)	<p>Thank you for consulting Historic England about your Regulation 14 draft Neighbourhood Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.</p> <p>Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers – be they interested members of the public, planners or developers – regarding how the place should develop over the course of the plan period.</p> <p>We welcome the production of this neighbourhood plan.</p> <p>At this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area, but we offer some general advice and guidance below, which may be of assistance. The conservation officer at your local Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets.</p> <p>Paragraph 190 of the National Planning Policy Framework (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.</p> <p>It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.</p>		<p>Noted</p>	
Historic England (e)	<p>The government's National Planning Practice Guidance on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <a href="https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7">https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7</a></p> <p>The plan could also include consideration of any Grade II listed buildings or locally designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/</a></p>		<p>Noted</p>	
Historic England (e)	<p>The Conservation Area may have an appraisal document that would ordinarily set out what the character and appearance of the area is that should be preserved or enhanced. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up to date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan. Historic England's guidance notes for this process can be found here: HE Advice Note 1 - conservation area designation, appraisal and management, and here: <a href="https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/">https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/</a>. The funding opportunities available from Locality discussed above could also assist with having this work undertaken.</p> <p>The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place and respond to local character and history by reflecting the local identity of the place – for instance through the use of appropriate materials, and attractive design.</p> <p>Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here: <a href="https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces">https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces</a>.</p> <p>You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <a href="http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/">http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/</a>.</p> <p>Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: <a href="https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/">https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/</a></p>		<p>Noted. The historic environment was not specifically a matter raised by the community when the plan was being developed.</p>	

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Historic England (e)	<p>If you are concerned about the impact of high levels of traffic through your area, particularly in rural areas, the “Traffic in Villages” toolkit developed by Hamilton-Baillie Associates in conjunction with Dorset AONB Partnership may be a useful resource to you.</p> <p>Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>.</p> <p>Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: <a href="https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/">https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/</a></p> <p>The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:</p> <p>HE Advice Note 2 - making changes to heritage assets: <a href="https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/">https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/</a></p> <p>HE Good Practice Advice in Planning 3 - the setting of heritage assets: <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a></p> <p>If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:</p> <p>HE Advice Note 3 - site allocations in local plans: <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans</a></p> <p>HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a></p> <p>We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.</p>		Noted	
David Neame for Donnington Homes (e)	<p>2. Policy HUNG1: Housing Mix</p> <p>2.1 In delivering a sufficient supply of homes, the NPPF (para.62) highlights that the size, type and tenure of housing needed for different community groups should be assessed and reflected in planning policies. The aim of Hungerford Town Council's objective to achieve an appropriate mix of dwellings is supported, and it appears that, in caveating the mix sought depending on the most up to date evidence on local housing need, it is acknowledged that the Berkshire Strategic Housing Market Assessment (SHMA) captures a moment in time and is unlikely to be relevant to the whole plan period.</p> <p>2.2 Donnington Homes would, however, like to highlight that the evidence to support the housing mix should be proportionate to the development, recognising local variation, and it is recommended that the policy be amended to 'seek' a variation in two-bedroom units.</p> <p>3. Policy HUNG11: Wildlife Friendly Development</p> <p>i. Policy HUNG11 A.</p> <p>3.1 The objective to protect and enhance wildlife and biodiversity is supported by Donnington Homes. However, it is considered that Policy HUNG11 A. should be amended to require the delivery of Biodiversity Net Gain in line with current legislation and guidance, applicable at the time the application is made.</p> <p>4. Site Specific Representations: Land at Smitham Bridge Road (Policy HUNG12)</p> <p>4.1 Donnington Homes has an option on the land at Smitham Bridge Road and the site has been extensively promoted through the Local and Neighbourhood Plans. The site is proposed for allocation (Policy HUNG12) to accommodate a minimum of 44 residential dwellings and Donnington Homes supports the allocation overall.</p> <p>4.2 It is noted that there was some concern from residents with reference to the current allotments being retained as such in perpetuity. In response to this, Donnington Homes has and can confirm that a subsequent planning application will include the permanent retention of the Marsh Lane allotments, secured through the S106 Agreement, land transfer or a combination of the two (Appendix A).</p>		<p>HUNG1 - Noted. The policy will be amended to enable other local evidence to be taken into consideration.</p> <p>HUNG11A - Noted. However, given that this is a matter ultimately of national policy, it is self-evident that any amendment to this at national level will flow through to lower tier policy.</p>	Amend HUNG1
David Neame for Donnington Homes (e)	<p>ii. Policy HUNG12 d.</p> <p>4.3 Policy HUNG12 d. states:</p> <p>“The upgrading of Public Right of Way HUNG46 so that it is capable of everyday use all year-round and has suitable lighting for use after dark. Such lighting must be designed to protect the amenity of neighbouring residents.”</p> <p>4.4 Donnington Homes does not object to the upgrade of the Public Right of Way within the extent of its landcontrol. However, the reference to 'suitable lighting' must recognise that, in addition to the protection of the amenity of neighbouring residents, there is also the need for the provision of lighting to be balanced with the potential for ecology impacts on site, with particular reference to the possibility of the presence of bats, as well as the impact that lighting can have on the ANOB. It is therefore important for the policy to acknowledge the balance and seek sensitive lighting.</p> <p>iii. Policy HUNG12 i.</p> <p>4.5 Criteria i. of Policy HUNG12 states: "Development is located away from areas at high risk of surface water flooding."</p> <p>4.6 Whilst every effort will be made to situate development outside of areas at risk of surface water flooding, it is considered that this policy should allow the flexibility to mitigate the potential for surface water flooding, should it be the case where an element of the proposal overlaps with an area of surface water flooding.</p> <p>APPENDIX SOLICITORS LETTER Land at Smitham Bridge Road, Hungerford ("the Property") We act for Dennington Homes Limited, who have been promoting the Property and other land to the west of Hungerford for development through the emerging Hungerford Neighbourhood Plan.</p> <p>Our client has instructed us to write to you to confirm that, in the event that they submit a planning application for the development of the Property (annotated HUN? on the attached plan), the planning application will provide for the permanent retention of the Marsh Lane allotments annotated HUN9 on the attached plan. The planning application shall also include the mechanism for securing the permanent retention of the allotments ( either through SI 06 Agreement or land transfer or both).</p>		<p>Para 4.4 - Noted and agreed</p> <p>HUN12i</p>	<p>Amend HUNG12d.</p> <p>Amend HUNG12i.</p>
Natural England (e)	<p>Thank you for your consultation on the above dated 16 February 2024</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England has the following comments to make on the plan:</p> <p>Policy Hun 12: Land at Smitham Bridge Road</p> <p>We note that this allocation is in hydrological connectivity with Freemans Marsh SSSI via an ordinary watercourse. We therefore advise that the policy include wording to ensure that potential hydrological impacts from the development are fully assessed and appropriate mitigation is provided if required.</p> <p>Policy Hun 13: Land North of Cottrell Close</p> <p>We note that this allocation is located to the north of the Kennet and Lambourn Valley Floodplain SAC and there is the potential for hydrological connectivity from the site via surface and groundwater flows. We therefore advise that the policy include wording to ensure that the potential for Likely Significant Effects on the SAC is fully considered in a Habitats Regulation Assessment to be submitted alongside the application.</p> <p>We also refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.</p> <p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species.</p> <p>Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p> <p>Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.</p> <p>For any further consultations on your plan, please contact: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p>		<p>HUNG12 - Noted</p> <p>HUNG13 - Noted</p>	<p>Amend HUNG12</p> <p>Amend HUNG13</p>

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Thames Water (e) EXCEL SPREADSHEET ATTACHED	<p>In light of the above comments and Government guidance, the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMFs). We recommend that the Neighbourhood Plan include the following policy/supporting text:</p> <p>"Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."</p> <p>"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."</p> <p>Policy HUNG10 - Comments in Relation to Water Efficiency and Flood Risk/Sustainable Drainage Systems. We support the references to water efficiency in principle, but the policy needs to be strengthened. The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link: <a href="https://www.thameswater.co.uk/Be-water-smart">https://www.thameswater.co.uk/Be-water-smart</a></p> <p>It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.</p> <p>Proposed policy text:</p> <p>"Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standard is achieved."</p>		<p>Wastewater/sewerage and water supply infrastructure - The Neighbourhood Plan cannot compel the Local Planning Authority to act in a particular way.</p> <p>HUNG10 - Noted and agreed</p>	Amend HUNG10
Thames Water (e) EXCEL SPREADSHEET ATTACHED	<p>Flood Risk/SUDS</p> <p>The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife, and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</p>		SuDS - Noted and agreed	Add text to Section 9 (sub-section on flooding)
Thames Water (e) EXCEL SPREADSHEET ATTACHED	<p>Site Allocations</p> <p>The attached table provides Thames Water's site specific comments from desktop assessments on sewage/waste water treatment works capacity in relation to the proposed development areas, but more detailed modelling may be required to refine the requirements.</p> <p>We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</a></p> <p>It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.</p> <p>Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.</p> <p>We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.</p>		Noted	
Canal & River Trust (e) (BROCHURE ATTACHED)	<p>General comment</p> <p>Please note that the Kennet &amp; Avon canal uses an ampersand in its name, not 'and'. This should be corrected throughout the document.</p> <p>The Canal &amp; River Trust have written a document to help those preparing Neighbourhood Plan to consider policy themes if there is a canal running through the plan area. A copy is provided as an attachment.</p> <p>Detailed comments</p> <p>Neighbourhood Plan Objectives</p> <p>Objective C: Seek to ensure that new housing reflects the character of its neighbourhood whilst embracing high quality design principles and modern energy efficiency standards.</p> <p>The Trust have prepared guidance on what we consider to be good waterside design and we are not opposed to new development alongside the canal if designed sensitively. We expect new development to consider ecology, climate and flood resilience, movement, heritage and identity, health and well-being, and activity on both the water and towpath. The Trust will be publishing a Waterway Design Code document soon which may be of assistance, and this can be provided in due course.</p> <p>The Trust is supportive of Policy HUNG2</p> <p>Objective O. 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.</p> <p>The Trust have prepared guidance on what we consider to be good waterside design and we are not opposed to new development alongside the canal if designed sensitively. We expect new development to consider ecology, climate and flood resilience, movement, heritage and identity, health and well-being, and activity on both the water and towpath. The Trust will be publishing a Waterway Design Code document soon which may be of assistance, and this can be provided in due course.</p> <p>The Trust is supportive of Policy HUNG2.</p>		Noted	

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
Canal & River Trust (e) (BROCHURE ATTACHED)	<p>The Trust is broadly supportive of Policy HUNG3 in relation to canalside development however as each location may be different in character perhaps more flexibility is necessary in the policy wording to reflect that a' one size fits all approach may not be appropriate. This could be achieving by simply adding 'where appropriate to paragraph A</p> <p>A. Development proposals adjacent to the gateways into Hungerford town should demonstrate how they contribute to creating a gradual transition from rural countryside to urban settlement (and vice versa) where appropriate. Development proposals should avoid creating an overly dense feel and appropriate planting or other natural boundary treatments should be used to mitigate the impact of development and retain the open feel.</p> <p>The final sentence "This should include the use of trees to line the gateway routes' may be overly prescriptive, as new tree planting may cause issues in relation to the stability and structural integrity of the canal bank as well as forward visibility and navigational safety Again, the use of 'where appropriate would introduce an element of useful flexibility. The objective is seeking to cover a mix of different gateway locations where different approaches may be needed.</p> <p>Objective P: and ACTION A: CONSERVATION OF HUNGERFORD'S LANDSCAPE Support the charities and agencies which are responsible for the conservation of the landscape around Hungerford.</p> <p>The Canal &amp; River Trust encourages partnership working with other agencies and the Town Council.</p> <p>ACTION E TOURISM</p> <p>At bullet point iv. The plan mentions the continuation of the promotion of Hungerford's role in the antiques trade. historical surroundings, the canal and the 'Great West Way' initiative, all of which are supported by the Trust.</p> <p>Objective F. Minimise the effects of traffic in the town centre and especially the High Street for the benefit of pedestrians and all road users &amp; Objective G: Increase walking and cycling in the town.</p> <p>The new Hungerford Neighbourhood Plan is a great opportunity for the town to protect and enhance active travel infrastructure, including NCN 4, helping to meet the plan objectives to 'Increase walking and cycling in the town'.</p> <p>There is an aspiration to move the NCN4 route onto the towpath and it is noted that there is no mention of the National Cycle Network within the draft neighbourhood plan policies although Paragraph 2.23 refers to "Sustrans cycle routes through the town centre. A partnership project called 'Reimagining the towpath' is looking at moving NCN 4 onto the towpath around Hungerford.</p> <p>We are currently working closely with Sustrans and West Berkshire Council and a key third party to form a partnership establish a programme that aims to progressively improve the</p>		HUNG3A - Noted and agreed	Amend HUNG3A
Canal & River Trust (e) (BROCHURE ATTACHED)	<p>The NCN route is one of the key walking/cycle routes through the town but is omitted from the map accompanying Policy HUNG6 (fig. 7.1). The NCN should be considered one of the key transport routes through Hungerford and by showing this on fig 7.1 opportunities for connections to/from new development, or potential for improvements through developer contributions or other funding are not missed, thus increasing the opportunity for people to have access to good quality active travel routes.</p> <p>We request that the reimagining NCN be added to the policy map. We understand that Sustrans can provide GIS layers to facilitate this.</p> <p>Policy HUNG6</p> <p>A-comment mention of disabled users. Due to width restrictions, it will not be possible to segregate users on the Improved canal towpath.</p> <p>C-proposals to enhance the identified walking and cycling corridors should include The Trusts partnership with Sustrans, West Berkshire Council and the Greenham Trust for the feasibility of improving the towpath as a multi-user route, for walking and considerate cycling through Hungerford and between other towns.</p> <p>D-Developer contributions should be required to mitigate against any detrimental impact on existing routes as a result of additional usage.</p>		<p>NCN4 Noted and agreed</p> <p>HUNG6D - Noted and agreed</p>	<p>NCN4 - include in HUNG6</p> <p>Amend HUNG6D</p>
Canal & River Trust (e) (BROCHURE ATTACHED)	<p>Objective J. We note that the canal corridor is included which facilitates boating, water sports, walking, cycling and other activities.</p> <p>Objective L and POLICY HUNG&amp; LOCAL GREEN SPACES</p> <p>At part B it is noted that Proposals for built development on these Local Green Spaces will not be permitted unless the proposal is for an ancillary feature, and it can be clearly demonstrated that it is required to support or enhance the role and function of the identified Local Green Space. The Canal &amp; River Trust wish to consider any implications of this allocation further, and will provide a follow up response on this matter as soon as possible.</p> <p>Objective N. Protect and enhance the appearance and historic environment of the town and parish.</p> <p>ACTION B: IDENTIFY NON-DESIGNATED HERITAGE ASSETS Undertake a review of non-designated heritage assets (buildings of heritage merit which are not nationally listed) and seek their addition to the West Berkshire Local List of Heritage Assets</p> <p>The Canal &amp; River Trust consider that the Kennet &amp; Avon in its entirety, where not specifically included within a Conservation Area should be considered as a non-designated heritage asset.</p> <p>Health and wellbeing Objective K: The Trust promote the canal towpath as a free to use open air gym. In some parts of our canal network, we are working with local doctors' surgeries to</p>		Noted	
Resident	<p>Objection to the two site allocations. Various comments regarding the robustness and application of the site selection process and the consideration of the alternative site, land east of Salisbury Road (HUN14).</p>		The process of assessing and presenting the sites is considered to be fair and balanced. The SEA also assesses the environmental impacts of the site allocations and also assesses reasonable alternatives in a robust	
Pro-vision (Cala)(e)	<p>1. Housing requirement - the sites proposed for allocation only meet the minimum requirement and, if that requirement were to be increased, then there would be insufficient dwellings allocated to meet the Local Plan allocation.</p> <p>2. Affordable housing and housing mix - more dwellings should be allocated in the Neighbourhood Plan in order that the affordable housing needs in Hungerford can be met in full.</p> <p>3. Site selection and the benefits of allocating HUNG12 (securing the future of the allotments) - the Neighbourhood Plan cannot secure the proposed benefit of the retained allotments. By contrast, the land east of Salisbury Road (HUN14) can be guaranteed to deliver wider public benefit in the form of new allotments.</p> <p>4. Procedural matters - the SEA Scoping was undertaken after consultations on site options.</p>		<p>1. The scale of growth being planned for in the Neighbourhood Plan is a matter to be addressed through the emerging Local Plan. The SEA has considered the reasonable alternatives, including a higher level of growth, and is considered to represent an appropriate approach.</p> <p>2. The need for more affordable housing is recognised. However, the scale of growth required to be delivered in Hungerford (by the emerging Local Plan) recognises that this needs to be balanced with the sustainability of higher scales of growth in this location.</p> <p>3. The promoters of HUNG12 have provided a letter via their solicitors confirming that any planning application will include the mechanism for securing the permanent retention of the allotments. The general site selection process and the SEA is considered to be robust.</p> <p>4. With regard to the evidence presented at Regulation 14 regarding the assessment of potential environmental impacts, it is considered that the requirements of the Neighbourhood Planning Regulations regarding Basic Condition have been met. Whilst the Scoping Report was completed at a later date, the consideration of sites accounted for all sustainability criteria from the very start. The process of assessing sites is explained in the Hungerford Neighbourhood Plan Site Assessment Report.</p>	
Denford Park East Ltd (e)	<p>HUNG12 and HUNG13 - incorrect sizes of site</p> <p>HUNG12 - the proposed location where highway access would be provided cannot be achieved safely.</p> <p>HUNG13 - it is not clear how or whether highway access can be achieved.</p> <p>Policy maps incorrectly label HUN12 and 13</p> <p>Site selection process - comments regarding the robustness of the site assessment process and the consideration of reasonable alternatives.</p>		<p>Site sizes - Noted and acknowledged. This was an error in drafting</p> <p>HUNG12 - access. Whilst the comments are acknowledged, WBC Highways Development Management has not objected to the proposals.</p> <p>HUNG13 - access. The access route was omitted from the plan in error.</p> <p>Site selection process - The general site selection process and the SEA is considered to be robust.</p>	<p>Amend sizes of sites in Section 10</p> <p>Amend HUNG13 maps to show access route as part of site allocation.</p> <p>Amend Policies Maps to correctly label HUN12 and 13.</p>
West Berks Council (e)	<p>Various comments regarding detailed drafting matters throughout the plan.</p>		Various comments - these are noted and are addressed as appropriate	Various amendments
	<p>HUNG1: Housing mix. We would welcome the HNP being a further spur to developers providing sufficient cycle parking for residents and visitors within new development, at the very least for those developments of 5 dwellings and above, as a proportionate measure to encourage local cycling</p> <p>HUNG2, Design and Character: - there is no mention made of Hungerford's burgage plots, ie the narrow property boundaries within the historic town centre of Hungerford. These are a particular feature of a planned town, and are relatively well-preserved in Hungerford. Under an old local plan, they had their own policy, but this wasn't retained. Our Historic Environment Character Zone for Hungerford's Historic Core noted that protecting the definition and character of the burgage plots remains a high priority.</p>		<p>Noted. However, this policy concerns the mix of housing, not provision for active travel.</p> <p>Noted and agreed.</p>	<p>Address the character of the historic town centre and the presence of burgage plots.</p>

Organisation (where relevant)	Representations on NDP	Representations on SEA	Response by HTC	Amendment to plan
	HUNG4: Retrofitting historic buildings. Clause A: should encourage a whole-building approach. Clause B: would be helpful to differentiate between listed buildings and those not listed but within conservation areas. - Listed buildings - secondary glazing and, in specific cases, slim line double glazing; - Conservation areas – timber windows (can be double or triple glazed, provided that they can appropriately match the appearance of the existing).		Clause A - noted and agreed. Clause B - agreed that the disinction should be made. However, we do not agree that it is appropriate to only accept timber windows in conservation areas. The importance of preserving heritage features needs to be weighed up aganst the imperative of increasing the energy efficiency of our stock of buildings. If there is a more suitable material which preserves heritage features whilst increasing energy efficiency then that should be permissable.	Amend HUNG4
	Getting about and HUNG6 - separating out key walking and cycling routes		Agreed - separate routes for walking and cycling will be identified	Amend HUNG6 and walking/cycling
	HUNG8: Local Green Spaces. One of the criteria is that the green space must be demonstrably special to a local community and hold a particular significance and it gives examples of such significance, such as for its beauty, historic significance, recreational value, tranquillity or the richness of its wildlife. There is brief mention in the HNP about how four of the proposed designations meet the criteria. There is also some mention of the designations in the AECOM Environmental Report, however, a detailed LGS assessment should be completed for all the recreational sites yet to be assessed against the LGS criteria.  Are any of the Local Green Spaces in private ownership? If so, have the landowners/agents been contacted?		The evidence and justification for the LGSs is presented in a supporting evidence paper. All owners of LGS land have been consulted.	
	HUNG11: Wildlife-friendly deveopment.HUNG11A does not align with mandatory BNG. Although the BNG hierarchy does prioritise delivery of BNG on-site, delivery on site as required by the policy is not mandatory but could be through a combination of on site or off-site enhancements and national credits.		Noted and agreed. This will be amended to reflect a desire to deliver on site where possible.	Amend HUNG11A
	Site allocations. The HNP read in tandem with the AECOM Environmental Report provides more background information as to how the aforementioned selection of sites had been made. However, the HNP in itself makes no mention of the (various other) options, the method of selection, and the evidence in favour of the two sites.		Noted. This evidence is included in the Hungerford Neighbourhood Plan Site Selection report which will be included in the submission documents at	
	HUNG13. The Town Council asked about this last March, and the Archaeology Team replied stating that an archaeological desk-based assessment would be needed as a first step if developing the land, due to the potential in the wider area.		Noted and agreed	Amend HUNG13
	HUNG13. There are no overriding ecological designations that would prevent allocation. Support the requirement for submission of ecological information to accompany any future planning applications. Recommend that point (i) is broadened to include 'protected <u>habitats</u> and species' and that the full mitigation hierarchy is referenced '...can be adequately <u>avoided, mitigated and/or compensated for.</u> '		Noted and agreed	Amend HUNG13