



## 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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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:	Mr	
First Name:*	Paul	
Last Name:*	Bowen	
Job title (where relevant):		
Organisation (where relevant):		
Address* Please include postcode:	<div></div> <div></div> <div></div> <div></div>	
Email address:*	<div></div>	
Telephone number:	<div></div>	

\*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> ):	Paul Bowen
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**Please indicate which part of the consultation documents that this representation relates to:**

Policy:	Hungerford Neighbourhood Plan and Policy Hung 12
Section/paragraph:	Hungerford Neighbourhood Plan – Section 10 Site Allocations. Paragraph k
Appendix:	

**Comments**

I object to building on Land at Smitham Bridge Road. As noted in Policy Hung12 of the Hungerford Neighbourhood Development Plan Point K it states the need to provide a Construction Traffic Management Plan for Smitham Bridge Road and Church Street.

How do you plan to control the significant increase in traffic by adding approximately 44 houses on this site? When you have increased the traffic considerably more than it would have been 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 and Church Street. These roads are very narrow in parts.

Note that this is one of the main reasons I do not believe that Land at Smitham Bridge Road is a suitable site when these roads 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 and finish times.

Please add an additional point to Policy Hung12 in the Hungerford Neighbourhood Development Plan that they need to provide a Construction Traffic Management Policy **after** construction on Smitham Bridge Road and Church Street. This will help the problem with the trig in the road adjacent to Church Way and Parsonage Lane and where there is currently residents parking on several places along Smitham Bridge Road and Church Street where two cars cannot pass and you cannot see on-coming traffic around the parked cars already.

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Policy:	Hungerford Neighbourhood Plan
Section/paragraph:	Hungerford Neighbourhood Plan – Section 10 Site Allocations.
Appendix:	

**Comments**

I object to building on Land at Smitham Bridge Road as per Section 10 of the Hungerford Neighbourhood Development Plan. By building approximately 44 houses on the upside of the stream and removing the ability of rainfall to soak into the ground above where the new houses are to be built, will increase the amount and 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.

The Land at Smitham Bridge Road was previously rejected by West Berkshire Council for housing development on more than one occasion. WBC said this site was unsuitable for housing for several different reasons – so why are Hungerford Town Council now proposing in Section 10 of the Hungerford Neighbourhood Development Plan - that this site is suitable?

This Land is also next to the industrial estate and still has an increased flood risk.

The Land at Smitham Bridge Road is also a long way from the schools.

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## Part B – Your Representation

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Your name or organisation ( <i>and client if you are an agent</i> ):	Paul Bowen
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Policy:	Hungerford Neighbourhood Plan – Policy Hung 12
Section/paragraph:	Hungerford Neighbourhood Plan – Section 10 Site Allocations
Appendix:	

## Comments

In Policy Hung12 of the Hungerford Neighbourhood Development Plan – item a. It is proposed to build approximately 44 dwellings. However, in previous housing development proposals for this site, it was proposed to build 35 dwellings which was rejected by West Berkshire Council. Yet now, it is proposed to build approximately 44 dwellings on a smaller site (due to the Shalbourne River on the Eastern side) and I do not understand what has changed from the previous rejection by WBC? 44 houses on land of 2.11 hectares is too much as described in Section 10.4 of the Hungerford Neighbourhood Development Plan.

I object to building on Land at Smitham Bridge Road as per section 10 of the Hungerford Neighbourhood Plan.

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## 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> ):	Paul Bowen
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**Please indicate which part of the consultation documents that this representation relates to:**

Policy:	Hungerford Neighbourhood plan and Hungerford Neighbourhood Plan Consultation Statement October 2024
Section/paragraph:	
Appendix:	Appendix A of the Consultation Statement

## Comments

In the Regulation 14 Consultation – residents' comments are noted in the Hungerford Neighbourhood Development Plan Consultation Statement Appendix A by Hungerford Town Council which clearly shows that the majority of the people who responded to the proposed plan have made it clear that they do not agree with housing development being on Land at Smitham Bridge Road – Section 10 of the Hungerford Neighbourhood Development Plan - due to traffic problems and some have noted the previous floods and future flood risks.

Why therefore, have Hungerford Town Council ignored these residents' responses and continued to allocate Land at Smitham Bridge Rod for housing in the Hungerford Neighbourhood Development Plan? This site is not suitable and I object to building on this greenfield land in the countryside.

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

Policy:	Hungerford Neighbourhood Plan
Section/paragraph:	3.2 and 10
Appendix:	

**Comments**

The Hungerford Neighbourhood Plan states in its objectives in 3.2 and 10, that new housing, should where possible make best use of previously developed land and minimise encroachment into the countryside but the housing site allocations in Section 10 – states to build approximately 44 houses on Land at Smitham Bridge Road. This does not take into account that the Land at Smitham Bridge Road is in a designated area of natural beauty and is in the countryside.

**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> ):	Paul Bowen
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Policy:	Hungerford Neighbourhood Plan
Section/paragraph:	Hungerford Neighbourhood Development Plan – 3.2. and 10
Appendix:	

**Comments**

I would like you to note that there was a recent planning application to build 45 new homes on a brownfield site at Hungerford Train station (formerly Oakes Brothers) adjacent to the Railway Tavern. This would have given Hungerford Town Council 45 of their 56-housing quota on a **brownfield** site. Indeed, the SEA Environmental Report states brownfield sites should always be the first choice.

But Hungerford Town Council did not even suggest that this was a site to be considered for housing development during the consultation at Regulation 14 or Regulation 16. Why is that?

The Hungerford Development plan states in its objectives in 3.2. and 10 that where possible housing should be allocated on previously developed sites which would make the land adjacent to the Railway Tavern fulfil this objective. Using Land at Smitham Bridge Road as per Section 10 of the

Hungerford Neighbourhood Development Plan does not fulfil this objective and is why I object to building houses on this land.

## 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> :	Paul Bowen
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**Please indicate which part of the consultation documents that this representation relates to:**

Policy:	Hungerford Neighbourhood Plan Strategic Environmental Assessment (SEA) Environmental Report for the Hungerford Neighbourhood plan. Dated February 2024.
Section/paragraph:	Various paragraphs marked below from the SEA and Hungerford Neighbourhood Development Plan section 10
Appendix:	

## Comments



Please refer to the In the SEA Environmental Report dated February 2024 – page AECOM iii – Paragraph “establishing the reasonable alternatives”.

I object to the proposed housing development on the Land at Smitham Bridge Road in Section 10 of the Hungerford Neighbourhood Development Plan because in the SEA Environmental Report more suitable sites were put forward to Hungerford Town Council.

I think a much better site would be Option 2 – the Land at Salisbury Road as detailed in the SEA Environmental Report – Page AECOM iii. It is also nearer to the schools; it 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 how Hungerford Town Council have concluded to choose Land at Smitham Bridge Road for housing development in Section 10 of the Hungerford Neighbourhood Development Plan over Salsibury Road.

Access to the site would be off a major road – the A338 which has recently been widened at a cost to West Berkshire Council, to allow for access to two recent housing developments at Kennedy Meadow and Lancaster Park.

## Part B – Your Representation

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Your name or organisation (and client if you are an agent):	Paul Bowen
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**Please indicate which part of the consultation documents that this representation relates to:**

Policy:	Hungerford Neighbourhood Plan Strategic Environmental Assessment (SEA) Environmental Report for the Hungerford Neighbourhood plan. Dated February 2024.
Section/paragraph:	Hungerford Neighbourhood Development Plan Section 10. SEA Environmental Report 6.38
Appendix:	

## Comments

The Hungerford Neighbourhood Development Plan Section 10, allocates housing on Land at Smitham Bridge Road. This does not take into account that this land is in a designated area of natural beauty as described in the SEA 6.38. The SEA states that Land at Smitham Bridge Road will lead to a significant adverse effect on the landscape reflective of the greenfield nature of the site.

So why have Hungerford Town Council allocated the Land at Smitham Bridge Road for housing as per Section 10 of the Hungerford Neighbourhood Plan?

## Part B – Your Representation

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

Policy:	Hungerford Neighbourhood Plan Strategic Environmental Assessment (SEA) Environmental Report for the Hungerford Neighbourhood plan. Dated February 2024.
Section/paragraph:	Various paragraphs marked below from the SEA Environmental Report and Hungerford Neighbourhood Plan Section 10 Site Allocations
Appendix:	

## Comments

**I raised the objections below at Regulation 14 Consultation against housing being allocated on Land at Smitham Bridge Road as detailed in Section 10 of the Hungerford Neighbourhood Development Plan.**

**However, my responses were ignored by Hungerford Town Council and are not included in Appendix A of the Consultation Statement dated October 2024**

**The reasons that I object to housing on Land at Smitham Bridge Road is because of the facts in the Strategic Environmental Assessment (SEA) Environmental Report dated February 2024. The report clearly shows that this site is not the most appropriate for housing development.**

### **6.22 of the SEA Environmental Report – Community Wellbeing.**

Land at Smitham Bridge Road allocated for housing development in Section 10 of the Hungerford Neighbourhood Development Plan is not the best site and I object to this site being used for housing allocations. In the SEA Environmental Report, Land at Smitham Bridge Road ranked worst of all the 5 options. With this being such a key factor for the whole community's well-being, why has Hungerford Town Council chosen Option 1 to build on Land at Smitham Bridge Road? Option 2 Land at Salisbury Road was the best scoring and should be the site chosen for housing development.

### **6.45 & table 6.1 of the SEA Environmental Report.**

In the Conclusions of the SEA Environmental Report – 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 Hungerford Town Council chosen Option 1 i.e. to build on Land at Smitham Bridge Road as shown in Section 10 of the Hungerford Neighbourhood Development Plan which I object to.

### **9.41 of the SEA Environmental Report – Landscape**

The SEA states that vehicular access to Option 1 – Land at Smitham Bridge Road is via North Standen Road. It also states that this is an identified gateway into the town. Yet this road is about two miles plus of single-track road, not suitable as an access road to a housing estate. I believe this "is a joke" – for Hungerford Town Council (HTC) to state that this is a suitable access road and a gateway to Hungerford town. HTC have stated in 10.6 of the Hungerford Neighbourhood Development Plan that access to the site will be from North Standen Road which I object to because it is narrow and unsafe for this additional volume of traffic. Option 2 – Land at Salisbury Road is a much better option for housing development with good vehicular access off the main A338 road.

### **11.5 of the SEA Environment Report Next Steps**

Here it states under **Section 11 – Next Steps and monitoring** – in section 11.5 - that if the Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum to all Hungerford residents to be able to put the Plan forward for approval. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be "made".

So, therefore, why in sections **7.1 to 7.7 and table 7.1 of the SEA Environmental Report** - did HTC put forward the most critical part of the Neighbourhood Plan i.e. new housing site allocations as described in Section 10 of the Hungerford Neighbourhood Development Plan, based on only 4% of the town's population input at discussion states in November 2023? This is unfair. Only 243 people responded out of a town population of 5864.

## 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> ):	Paul Bowen
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**Please indicate which part of the consultation documents that this representation relates to:**

Policy:	Hungerford Neighbourhood Plan 2024 – 2041 Consultation statement dated October 2024
Section/paragraph:	
Appendix:	A of the Consultation statement

## Comments

**Item 2.11 of the Hungerford Neighbourhood Plan 2024 – 2041 Consultation statement dated October 2024** shows in Table at 2.11 that only 243 people voted for housing site allocations.

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. Or at least been shown these options in the Draft Hungerford Neighbourhood Development Plan at Regulation 14 Consultation. The majority of Hungerford Town population were not made aware of the previous discussion stages and not made aware of how important the November 2023 discussions were. i.e. that housing site allocations would be chosen from this meeting. If the Hungerford Neighbourhood Development Plan goes forward to a Referendum, then Hungerford Town Council should list all the 5 options for local people to vote for.

Hungerford Town Council state in The Consultation Statement dated October 2024 at 2.9 that people were told about the November 2023 consultations but these were not well publicised and Hungerford residents had no idea that housing site allocations would be chosen from these meetings. This is reflected in the low number of people responding.

**Please note that I raised the above points in the Regulation 14 Consultation stage but my responses were ignored by Hungerford Town Council. They are not included in Appendix A of the Consultation Statement.**

## 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>	<i>Paul Bowen</i>	<b>Date</b>	<b>11<sup>th</sup> May 2025</b>
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**Your completed representations must be received by the Council by 11:59pm on Friday 23 May 2025.**