

Summary of representations received by West Berkshire District Council on the Hungerford Neighbourhood Development Plan as part of the Regulation 16 consultation

Consultation dates: 4 April – 23 May 2025

Number of responses: 46

Respondent	Section / policy / paragraph	Summary of response
Amos, Anthony	Policy HUNG13: Land north of Cottrell Close	Objection to allocation: • Land Stability: The site is on a steep incline with signs of ground movement. Retaining walls may not support additional structures. A full geotechnical survey is essential. • Drainage and Sewage: Existing infrastructure is inadequate, with past sewage flooding incidents. Upgrades and capacity confirmation from water authorities are required. • Fuel Pipeline Risk: The site borders the GPSS pipeline. Construction could endanger this critical infrastructure. Formal consultation with relevant authorities is necessary. • Power Supply Issues: The area suffers from frequent outages due to a rural power circuit. Integration with the main grid is needed before development. • Road Access: The access road is too narrow for construction and residential traffic. • Cemetery Proximity: Building next to a cemetery raises ethical and amenity concerns, making the site unsuitable for family housing. • Cost and Public Value: The site requires significant public investment to become viable. Alternative sites like Salisbury Road are more cost-effective and better equipped.
Barker, Robert	Statement of Consultation (Sections 2 and 3)	Comments made by several respondents as part of the Regulation 14 consultation have had no impact on the site selection work. HUNG12 remains as an allocation, despite the following concerns that were raised: • Highways. • Flood risk. • Distance from key amenities compared to the Salisbury Road site. • Highways impact.

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		Section 2 of the Consultation Statement does not reference the Reg 14 consultation. 112 responses were received to this, and a summary of the key themes would be useful.
Barrett, Josephine	Policy HUNG12: Land at Smitham Bridge Road	Comments raised at Reg 14 ignored, ie.: • Road safety issues. • Flood risk. • Salisbury Road site has direct access to the main road and could accommodate more dwellings.
Barrett, Steve	Policy HUNG12: Land at Smitham Bridge Road	Objection to allocation: • Access unsuitable. • Salisbury Road site more appropriate due to location of an A-road. • Flood risk.
Benson, Neil	Policy HUNG12: Land at Smitham Bridge Road	Objection to allocation: • Local road network unsuitable and will not be able to cope with increased vehicle movements. • Noise impacts from the adjoining commercial units. • Owner of the allotment site and developer using the allotments as bargaining tool to gain planning consent. • No confidence in Council for making decisions for the benefit of local residents.
Berkshire Gardens Trust	Action C, Objective P: Protect the landscape around Hungerford and support its conservation.	Action C should be reworded to include reference to parks and gardens of heritage merit.
Bowen, Paul	• 3.2 and 10 • Policy HUNG12: Land at Smitham Bridge Road • Chapter 10 Site Allocations • Appendix A, Statement of Consultation • SEA	• Objection to allocation of HUNG12: ○ Previously rejected as an allocation by West Berkshire Council. ○ Increase in surface water flood risk. ○ Fluvial flood risk. ○ Distance of site from schools. ○ Over development. Previous proposals were for 35 dwellings, and no explanation of why development potential has increased to 44 dwellings. ○ Failure to make best use of previously developed land which goes against objectives 3.2 and 10 of the Plan. Recent planning application on the

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		former Oakes Brothers site which would meet most of Hungerford's housing need. ○ Within National Landscape. • SEA Environmental Report: ○ Demonstrates that the site is unsuitable for allocation, eg. landscape, community wellbeing. ○ Reasonable alternative identified in the SEA Environmental Report (Option 2 Salisbury Road) is more suitable for allocation. • Statement of Consultation: ○ Response made at Reg 14 not included in Appendix A. ○ Limited input from the community to the November 2023 consultation on site allocations.
Carpenter, Stephen	Policy HUNG13: Land north of Cottrell Close	Objection to allocation. Site unsuitable for the following reasons: • Existing road network unsuitable for development. • Impact on road safety. • Subsidence. • Landscape impact. Salisbury Road more suitable for allocation.
Clavin, Alexandra	• Policy HUNG12: Land at Smitham Bridge Road • Policy HUNG13: Land north of Cottrell Close	Objection to allocations: • Development on the two allocated sites would not appeal to the existing population of Hungerford, who are in the older age range. • Local highway network could not cope with additional traffic. • Impact of construction on residents and wildlife – noise, dust, disruption to sewers, electric supply, and gas network. • Impact on the water quality of the River Dun and Shalbourne brook. • Extra parking provided would not be in keeping with the natural look of the town.
Cooper, Laura	• Plan preparation process • Site selection process.	• Plan preparation process: ○ Concern about impartiality of those who have prepared the documentation.

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	HUNG12: Land at Smitham Bridge Road	- Site selection process: - Local concerns ignored. - Errors in analysis. - Salisbury Road more suitable for allocation. - Objection to allocation of HUNG12: - Inaccessible. - Flood risk. - Ecological impact.
Cooper, Michael	Comments on the Plan as a whole which cover healthcare, retail, transport, and housing	- Comments made to the Reg 14 consultation ignored. - Plan lacks realistic and actionable solutions, offering only aspirations, in particular for the following: - Healthcare: Inadequate services, especially in GP access, dentistry, and pharmacy operations. - Leisure & Youth Facilities: Insufficient support for growing sports clubs and youth activities, failing to meet Objective J. - Retail: No effective strategy to revitalize the high street; paid parking seen as a deterrent. - Transport: Poor train services and lack of bold infrastructure plans, especially around the train station and cycling routes. - Objection to allocation of HUNG12. - Concerns about site selection process: - Flawed consultation methodology: low and potentially biased response rates). - Environmental concerns: flood risk, biodiversity loss, and flawed site assessments. - Inconsistencies and bias in how sites were evaluated and ranked. - Lack of transparency regarding developer engagement and influence of landowners, eg. Town and Manor charity. - Site selection process should be reassessed. - Town Council may lack the capacity to manage such a complex planning process
Crane, Martin	Policy HUNG13: Land north of Cottrell Close	Objection to the allocation of the site:

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		• Historical context and site suitability: not previously considered for housing and the original developer chose not to develop the land due to elevation and drainage issues. • Impact on current residents: the quiet, self-contained community would be disrupted. • Infrastructure and safety concerns: ○ Construction will result in increased traffic levels ○ Drainage and utility network need upgrading ○ Access for emergency vehicles could not be achieved ○ No landslip study ○ Structural integrity of existing dwellings could be compromised • Adjacent cemetery full, and this site could be used for its expansion. Hungerford Newtown should be considered for development. This would provide a strategic solution, rather than a short term fix to the housing need.
Cundy, Charlotte	• Policy HUNG3: Important gateways into and out of Hungerford • Policy HUNG12: Land at Smitham Bridge Road	• Public hearing required. HUNG3: • North Standen Road is not a gateway – rural single track road which vehicles do not use to approach Hungerford. HUNG12: • Objection to the allocation of HUNG12: ○ Local road network will not cope with additional traffic. ○ Flood risk. ○ Landowner and developer using the allotments as a bargaining tool to obtain planning permission. ○ Site scored as having a high environmental risk unlike Salisbury Road yet still allocated.
Cundy, Tim	• Policy HUNG3: Important gateways into and out of Hungerford	• Public hearing required. HUNG3:

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	Policy HUNG12: Land at Smitham Bridge Road	- North Standen Road is not a gateway – rural single track road which vehicles do not use to approach Hungerford. - Objection to the allocation of HUNG12: - Local road network will not cope with additional traffic. - Flood risk. - Landowner and developer using the allotments as a bargaining tool to obtain planning permission. - Site scored as having a high environmental risk unlike Salisbury Road yet still allocated.
Exolum Pipeline System Ltd	Policy HUNG13: Land north of Cottrell Close	Map indicates that an oil pipeline is situated underneath the site.
Fowler Architecture and Planning on behalf of Denford Park Pastures Ltd	- Paragraph 2.9: profile of the community - Paragraph 4.1: supporting text to policy HUNG1 - Paragraph 4.3: supporting text to policy HUNG1 - HUNG1: Housing Mix - HUNG2: Design and Character - HUNG3: Important Gateways into and out of Hungerford - Paragraph 8.6: supporting text to policy HUNG8 - HUNG11: Wildlife-friendly Development - HUNG12: Land at Smitham Bridge Road - HUNG13: Land north of Cottrell Close	Objection to the allocation of HUNG12 and HUNG13. - Para 2.9: - Makes reference to housing growth between 2011 and 2021, yet the Plan period goes up to 2041. - Para 4.3: - Makes reference to the aging population. HUNG12 is some distance from bus stops, train station and shops. It will not cater for an aging population. - Para 8.6: - Para 107 of the NPPF, not 106. - Policy HUNG1: - Support for policy, but it should be based on an up-to-date Housing Needs Assessment (HNA). Policies relies on HNA produced in 2019. - Policy HUNG12: - Objection to allocation. - Limited capacity. - Flood risk. - Visibility splays and road width inadequate. - Previous planning applications refused. - Impact on the National Landscape. - Poor access to public transport and amenities.

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	Site selection process (HUN15 Follydog Field)	- Policy HUNG13: - Objection to allocation. - Not assessed in HELAA. - Limited capacity. - Access concerns. - Heritage impact. - Landscape impact. - Alternative site (HUN15 Follydog Field): - Can deliver the 55 dwelling requirement for the Neighbourhood Area. - Identified as 'potentially developable in part' in the HELAA. - Potential for community benefits – open space, allotments, and ecological enhancements. - Better access to the A4, meaning congestion on the A4 will not be exacerbated. - Site selection process: - Inconsistencies in the way sites HUN15 and HUN20 were evaluated. - Policies HUNG3 and HUNG11: - Support for policies.
Gregory, Diana	Policy HUNG12: Land at Smitham Bridge Road	Objection to the allocation of the site: - Existing residents not considered in the allocation of the site. - Brownfield sites should be developed instead of greenfield sites. Contrary to Objective A of the Plan. - Impact on local highway network. - Flood risk. - Access issues. - GP surgeries will not cope with additional residents.
Harris, Mr & Mrs	Policy HUNG13: Land north of Cottrell Close	Objection to the allocation of the site: - Road safety. - Increased vehicle movements during construction. - A4 at capacity. - No pedestrian footpaths.
Hertfordshire County Council	No comments	No comments

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Heyland, Rosalind	Policy HUNG13: Land north of Cottrell Close	Objection to the allocation of the site: • Impact on road safety. • Construction would result in additional traffic and noise pollution.
Highways England	No comments	No comments
Historic England	No additional comments to those made at Reg 14	No additional comments to those made at Reg 14
Jackson, Douglas & Janet	Policy HUNG13: Land north of Cottrell Close	Objection to the allocation of the site: • Adjacent cemetery full, and this site should be used for its expansion • Inadequate access • Road safety risk due to increased vehicle movements • Thames Water previously identified that the existing waste water network was insufficient to cope with development. • Some properties have been affected by raw sewage.
Lockwood, Graham & Sue	Policy HUNG13: Land north of Cottrell Close	• Objection to the allocation of the site due to impact on safety. • An alternative access to the site via the garden centre or cemetery may make the allocation acceptable.
Morando, Emanuela	Comments on the Plan as a whole which cover the environment, green spaces, wildlife, and the greenbelt	• No consideration of build quality. • Countryside and wildlife should be protected. • Development should not take place in the greenbelt.
Morris, Kathryn	Policy HUNG12: Land at Smitham Bridge Road	Objection to the allocation of the site: • Development capacity unclear – 39 and 44 dwellings referred to. • Impact on local road network. • Access issues. • Flood risk. • Proximity to industrial estate and subsequent noise. • Distance from local amenities, shops, and schools.
Morris, Kevin	• Hungerford NDP Site Assessment Report (Section 3 Assessment of Sites) • Policy HUNG12: Land at Smitham Bridge Road	• Inconsistencies: ○ HUN7 not well situated between adjacent developments. ○ HUN6 rejected due to proximity to industrial units, yet HUN7 is also near to industrial units. • Objection to allocation of HUNG12. Reference made to original feedback on proposed site:

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		○ Least accessible site. ○ Access issues. ○ Noise from industrial estate. ○ Flood risk. ○ Impact on nature.
Neame Sutton on behalf of Donnington New Homes	• Policy HUNG1: Housing Mix • Policy HUNG10: Low Energy and Energy Efficient Design • Policy HUNG11: Wildlife-friendly Development • Policy HUNG12: Land at Smitham Bridge Road	• Policy HUNG1: ○ Support for policy. • Policy HUNG10: ○ Water efficiency standard should align with those in the West Berkshire Local Plan Review (110 litres of water per person per day). • Policy HUNG11: ○ Policy should be updated to reflect current Biodiversity Net Gain legislation and to provide flexibility in offsite habitat provision. • Policy HUNG12: ○ Support for allocation. ○ Some of the policy criteria should be amended: ▪ (d) the term ‘adequate’ is not defined. The requirement should instead refer to ‘consideration should be given to the development guidelines’. ▪ (e) and (f) should be combined. ▪ (i) a Transport Statement is a local validation requirement, and should not be requested through policy. ▪ (k) a Construction Management Plan is a matter for conditions, and not the policy. ▪ (l) should be reworded to align with Local Plan Review wording, ie. <i>‘the provision of high-quality open space in accordance with the requirements outlined in the West Berkshire Local Plan’</i>. ▪ (m) criterion should allow for flexibility to mitigate against surface water flood risk. ▪ (p) criterion should be removed as it is below the threshold for SSSI impact assessment and mitigation is covered elsewhere. ○ Letter from solicitors confirms that the Marsh Lane allotments will be retained permanently, via planning obligations.

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Network Rail	Action G: Traffic Impacts in Hungerford	• Railway industry would welcome discussions with the Town Council and other parties in respect of improving rail services and facilities at Hungerford Station. • Development that would result in a material increase or significant change in character of traffic using rail crossings should be refused unless, in consultation with Network Rail, that it can either be demonstrated that the 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. Two level crossings in the area will be affected. • Council has 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.
Oxfordshire County Council	n/a	No comments
Parry, John	Policy HUNG13: Land north of Cottrell Close	Objection to allocation: • Lack of representation and transparency: ◦ Lack of representation and transparency – no representation from residents north of the River Kennet. ◦ Steering group was unelected and dominated by Town and Manor of Hungerford members. • Impact on the cemetery. • Landscape and visual impact. • Steep slope of site increases risk of flooding, soil creep, and landslides. • Access unsuitable. • Sewerage system will not cope. Past incidents of sewage flooding. • Power supply network will not cope with additional development. • Road safety issues. • Landowner has ignored environmental commitments. • Salisbury Road should be allocated instead.
Pike, Steve	• Site selection process	• Site selection process:

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	Policy HUNG12: Land at Smitham Bridge Road	- Salisbury Road site is more suitable for allocation compared to HUNG12. - Objection to allocation of HUNG12: - Flood risk. - Impact of development on local road network. - Increase in traffic which would result in noise pollution, accidents, speeding. Value of home will be reduced.
Pocock, Benson	Policy HUNG12: Land at Smitham Bridge Road	Objection to allocation: - Local highway network unsuitable for development in this location. - Poor pedestrian access and no continuous footpaths. - Increased traffic levels. - Community opposition during the 2023 and 2024 consultations. - Loss of green space. - Environmental impact – proximity to Freeman’s Marsh SSSI and bird habitats, threat to red and amber listed bird species, contradicts policy HUNG11 and Objective S on biodiversity protection. - Harm to the rural gateway character. - Proposal does not meet demand for affordable housing and bungalows. - Salisbury Road more suitable for allocation: - Better road infrastructure. - Environmental suitability. - Supports multiple Neighbourhood Plan objectives. - Identified as part of preparation of previous Local Plans. - Flood risk low. - Close to services. - Limited public objection.
Pro Vision on behalf of Rootes Trustees	- Site selection process. - Policy HUNG12 Land at Smitham Bridge Road	- Site selection process: - Flawed, particularly in respect of HUNG12. - Appears to be based on notional public benefits, particularly the transfer of the Marsh Lane allotments to the Town Council which are not secured in the policy wording. - Objection to allocation of HUNG12: - Lack of legal binding for allotment transfer:

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		▪ Although the Town Council has received a solicitor's letter from the landowner/promoter promising the allotment transfer, policy HUNG12 does not mention this. Without a policy requirement, there is no legal obligation for a developer to include the allotment transfer in a planning application. ▪ If the site is sold or developed without the allotment transfer, the public benefit may never materialise. This undermines the selection of the site over others. ○ Any legal agreement at the planning application stage would likely fail the Community Infrastructure Levy Regulation 122 tests, which require obligations to be necessary, directly related, and proportionate.
Quartermaine, Kay	Policy HUNG13: Land north of Cottrell Close	Objection to the allocation of the site: • Access inadequate. • Road safety concerns. • Construction noise.
Roberts, Mark	Policy HUNG12: Land at Smitham Bridge Road	Development should ensure that the integrity and water quality of the adjacent chalk stream is protected. Proposals and/or contributions towards bank improvements or access for education via the site would be welcomed.
Sport England	General comments on neighbourhood plans. No specific comments on the Plan	Neighbourhood plans should: • Support active communities. • Comply with paragraphs 103 and 104 of the NPPF which promote social interaction, healthy and inclusive communities, and seek the protection and provision of sports facilities. • Presumption against the loss of playing fields. • Plans should be based on robust evidence, such as playing pitch strategies, indoor/outdoor sports facilities. • New housing developments should account for increased demand on sports infrastructure. • Consideration should be given to Sport England's Active Design Guidance.
Stephens, Charlotte	Policy HUNG13: Land north of Cottrell Close	Objection to allocation of site: • Construction traffic will result in noise pollution. • Impact on local road network during and after construction. • Impact on road safety.

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Thames Water	• General comments: water and wastewater infrastructure • Policy HUNG10: Low Energy and Energy Efficient Design • Action M: Minimising flood risk, damage, and over-heating • Policy HUNG12: Land at Smitham Bridge Road • Policy HUNG13: Land north of Cottrell Close	• General comments: water and wastewater infrastructure: ○ In line with the NPPF and PPG, developers should engage with Thames Water at the earliest opportunity to establish demand for water supply infrastructure, developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met, and whether the surface water drainage requirements can be met. ○ Neighbourhood Plan should include specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. • Policy HUNG10: ○ Support for policy. • Action M: ○ Flood risk sustainability objectives should make reference to sewer flooding. ○ Thames Water advocate an approach to Sustainable Drainage Systems that limits as far as possible the volume of and rate at which surface water enters the public sewer system. • HUNG12 and HUNG13: ○ No issues identified with the waste water or water supply network in relation to the two allocations.
Ventham, Tim	Policy HUNG13: Land north of Cottrell Close	Objection to the allocation of the site: • Risk of landslip due to the incline of the road. The road is already showing signs of landslip. Behind numbers 28-32, two retaining walls were built by the original developer, but there is no indication they were designed for further development at a higher elevation. Given the risk, a full risk assessment and mitigation plan should be prepared. • Existing sewerage system cannot cope with heavy rainfall. • Pipeline passes under the south of Cottrell Close. • Upgrades required to the electricity network to cope with development. • Access unsuitable.

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		Salisbury Road site more suitable for development, and development would have less costs associated with it than HUNG13.
Wareham, Jill	• Policy HUNG12: Land at Smitham Bridge Road • Chapter 10 Site Allocations • SEA Scoping Report • SEA Environmental Report • Basic Conditions Statement • Consultation Statement • Site Assessment Report	• Consultation Statement: ○ Reg 14 consultation response from respondent ignored by Hungerford Town Council. ○ Lack of transparency – residents unaware of November 2023 site selection consultation. ○ Some documents not available during earlier consultations, ie. SEA Scoping Report, HELAA. ○ Hungerford Town Council has failed to properly document or respond to public feedback in Appendix A of the Consultation Statement. • Objection to the allocation of HUNG12: ○ Environmental impact. ○ Traffic and access issues. ○ Policy criteria too vague, particularly in respect of flood risk assessments, landscape assessment, and ecological surveys. Some of the required studies should have been prepared before allocation. ○ Contradicts Neighbourhood Plan objectives – greenfield land outside of the settlement boundary, close to an industrial estate. ○ Opposition to allocation in Reg 14 responses ignored. ○ Photographs included of recent flooding on Smitham Bridge Road. • Site assessment / SEA: ○ SEA states that capacity of HUNG12 is up to 31 dwellings, yet site allocated for 44 dwellings. ○ Salisbury Road should be allocated instead of HUNG12: ▪ Site has the best overall score in the SEA in respect of biodiversity, flood risk, community wellbeing, and access to schools and services. ▪ Community support for site. ○ Brownfield sites not considered, eg. Oakes Brothers site. • Basic Conditions Statement: ○ Claims all responses were considered, however Miss, Wareham's was not. ○ Plan may not meet the legal consultation requirements.

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Welfare, Amy	Policy HUNG12: Land at Smitham Bridge Road	Objection to the allocation of the site: • Traffic increase. • Road safety would be compromised. Other more suitable sites in Hungerford.
West Berkshire Spokes	• Paragraph 2.3: Local context • Paragraph 3.1: Vision for Hungerford • Paragraph 3.2, Objective G • Policy HUNG2: Design and character	• Paragraphs 2.3 and 3.1: ○ No mention that the presence of cyclists enhances the everyday economy and tourism of Hungerford. This is in part due to the presence of National Cycle Network (NCN) 4. • Objective G, paragraph 3.2 and policy HUNG2: ○ In absence of alternative route for NCN4, current route through town poses safety risks due to hazardous roundabouts, heavy traffic, poor driver behaviour, and limited signage. ○ Proposed routes around outskirts of Hungerford lack connectivity, failing to support easy cyclist access into town.
Williams, Brian & Deborah	• Objective A • Objective C • Objective F • Objective L • Objective M • Objective O • Objective P • Objective S • Policy HUNG12: Land at Smitham Bridge Road • General comments on overall Plan	• Objective A: ○ Salisbury Road already encroached, and development should continue at this location. HUNG12 does not meet this objective because they are greenfield sites. • Objective C: ○ HUNG12 will fail to respect the character of Hungerford. • Objective F: ○ HUNG12 will fail to minimise the effects of traffic in the town centre. • Objective L: ○ HUNG12 will not minimise crime and anti-social behaviour. • Objective M: ○ Objective does not make sense. New schools will not be built. • Objective O: ○ Objective will not be achieved if North Standen Road is not widened. • Objective P: ○ The plan will not meet this objective because it will result in development on fields which in turn will have an impact on the landscape and biodiversity.

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		• Objective S: ○ The plan will result in a reduction in biodiversity. • General comments: ○ The Parish Council will be able to claim 25% of Community Infrastructure Levy if the Plan is adopted. Where will the remaining 75% of costs come from? ○ No additional infrastructure will be created. • Objection to allocation of HUNG12: ○ Fails to meet Plan objectives. ○ Disruption to existing residents and occupiers of the adjacent trading estate during construction (noise, increased vehicle movements, environmental disturbance). ○ Occupants unlikely to be local. ○ Increase in crime. ○ Impact on road safety.
Woodroof, Emma	Policy HUNG13: Land north of Cottrell Close	Objection to the allocation of the site: • Impact on wildlife. • Disruption during construction. • Local road network unable to cope with increase in traffic.
Ziesche, Anna	Policy HUNG12: Land at Smitham Bridge Road	• Unclear why another site recommended for allocation (Salisbury Road) has now been disregarded. • More benefits associated with the Salisbury Road site, such as the proximity to the school.

The representations in full are available to view on West Berkshire District Council's website: <https://www.westberks.gov.uk/hungerford-np-reg-16-consultation-responses>.