



Consultation on the Hungerford Neighbourhood Development Plan (Regulation 16 Consultation)

Representation Form

Ref:

(For official use only)

Please complete online or return this form to:	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy Team, Development and Housing, West Berkshire Council, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	11:59pm on Friday 23 May 2025

This form has three parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make
- Part C - Notification of progress of the Hungerford Neighbourhood Development Plan

PART A: Your Details

Please note the following:

- We cannot register your representation without your details.
- Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.
- All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>

	Your details	Agent's details (if applicable)
Title:	Mr	
First Name:*	Michael	
Last Name:*	Cooper	
Job title (where relevant):		
Organisation (where relevant):		
Address* Please include postcode:		
Email address:*		
Telephone number:		

*Mandatory field

Part B – Your Representation***Please use a separate sheet for each representation***

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

Policy:	Hungerford Neighbourhood Plan (Regulation 16 Consultation)
Section/paragraph:	
Appendix:	

Comments

Hungerford Neighbourhood Plan 2024-2041 Submission Stage (Regulation 16) Consultation Version October 2024 falls significantly short in providing a balanced viewed expectations for a town plan and has ignored ALL consultation comments that were provided on the pre-submission consultation (Regulation 14) December 2023 version, which should be representing the town not personal interests.

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.

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.*

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).

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 pays 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.

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.

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. Housing is clearly the most controversial and this plan must be rewritten on this basis alone:

- 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.
- The proposal indicates that HUN7 (Smitham Bridge Road) and HUN20 (Rear of Cott CI) 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
- 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.
- 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:
- 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. However, it is evident the ownership of the allotment site and the influence that is being placed on the authors of this report
- The 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.

- 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. Therefore Natural England should be consulted on this site.
- 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.
- 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
- 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.
- 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.
- 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.

- 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
- 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 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
- 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
- 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
- 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
- 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*

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?

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.

In summary this report is woefully inadequate and falls shorts on multiple fronts, most notably the housing proposals. The Town council should consider whether it has the capability and capacity to undertake such a complex piece of work. The county council should deeply analyse the support documents, analysis and understand which “expert” has written them, as well as review how the ownership of sites has influenced a bizarre outcome and the total disregard for residents and their interests and responses to the original “informal” consultation.

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	X
Decision to adopt the Hungerford NDP	X

Signature	Michael Cooper	Date	18-May-25
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Your completed representations must be received by the Council by 11:59pm on Friday 23 May 2025.