

From: [REDACTED]
To: [PlanningPolicy](#)
Subject: Jill Wareham Representation Form Consultation on the Hungerford Neighbourhood Development Plan Regulation 16 Consultation
Date: 19 May 2025 23:00:47
Attachments: [Jill Wareham Hungerford NDP Reg 16 Representation Form \(2\) Final.doc](#)

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Dear Sir/Madam

Please see attached the Representation Form from myself relating to the Consultation on the Hungerford Neighbourhood Development Plan (Regulation 16 Consultation).

I have also included in here the fact that my responses were ignored by Hungerford Town Council in the Regulation 14 Consultation which took place in February/March 2024. I raised a number of objections relating to to Section 10 of the Hungerford Neighbourhood Plan because I do not believe that Land at Smitham Bridge Road is suitable for housing site allocations. I would therefore be most grateful if West Berkshire District Council and the Independent Inspector would review this fact because I believe that the Regulation 14 consultation carried out by Hungerford Town Council was unfair and procedurally flawed.


Also attached are some pictures that I would like to include when Smitham Bridge Road was flooded recently.

Please may you acknowledge receipt of this document by kindly replying to this email.

Many thanks.

Kind Regards

Jill Wareham
[REDACTED]

 Gateway	Consultation on the Hungerford Neighbourhood Development Plan (Regulation 16 Consultation) Representation Form Ref: <i>(For official use only)</i>
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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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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:	Miss	
First Name:*	Jill	
Last Name:*	Wareham	
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 (and client if you are an agent):	Jill Wareham
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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:	<p>Relevant Documents;</p> <p>Hungerford Neighbourhood Plan – Section 10 Site Allocations.</p> <p>Hungerford Neighbourhood Plan 2024-2041 Consultation Statement dated October 2024.</p> <p>Strategic Environmental Assessment (SEA) for for the Hungerford Neighbourhood Plan – Environmental Report dated February 2024,</p> <p>Strategic Environmental Assessment (SEA) for the Hungerford Neighbourhood Plan – Scoping Report dated December 2023.</p> <p>Hungerford Neighbourhood Plan Basic Conditions Statement dated October 2024</p> <p>The Hungerford Neighbourhood Plan Site Assessment Report – August 2024 by HELAA and Appendices A & B carried out for Hungerford Town Council</p>
Appendix:	A of the Consultation Statement dated October 2024

Comments

The Regulation 14 Consultation Process carried out by Hungerford Town Council in February/March 2024, the previous informal meetings carried out by them in November 2023 and the phase carried out after Regulation 14 Consultation are in my opinion unfair, incorrectly recorded and procedurally flawed. The reasons are;

1. Hungerford Town Council (HTC) say that they carried out **Pre-submission (Regulation 14) consultation in February & March 2024** – see 1.15 of the Hungerford Neighbourhood Plan (HNP) 2024 – 2041 Consultation Statement dated October 2024 but I believe they failed to follow a fair consultation process at this stage and prior to that in November 2023.

This is because I am a resident of Hungerford and submitted a 12-page response document within the timeline of Regulation 14 consultation in March 2024 as to why I do **not** believe that Land at Smitham Bridge Road is suitable for Housing development as shown in Section 10 of the HNP and object to this site being chosen for Housing Site Allocations as per Section 10 of the Hungerford Neighbourhood Plan.

I raised objections to the Hungerford Neighbourhood Plan (HNP) & also cited evidence from the Strategic Environmental Report (SEA) Environmental Report dated February 2024 to support my responses but I have not been listened to by Hungerford Town Council. I also

gave lots of responses to the Strategic Environmental Report (SEA) Environmental Report dated February 2024 highlighting why they stated the Land at Smitham Bridge Road was unsuitable for housing development and my responses are also **not** included in the Hungerford Neighbourhood Plan 2024-2041 Consultation Statement dated October 202 - Appendix A.

All my responses to the Hungerford Neighbourhood Plan and the SEA Environmental Report dated February 2024, are **not** included in Appendix A of the Hungerford Neighbourhood Plan 2024-2041 Consultation Statement produced by HTC dated October 2024. This document was presented to West Berkshire District Council (WBDC) at the meeting on 27.3.25., when WBDC approved consultation to go forward to Regulation 16 but this Consultation Statement it is **not** representative of all the Hungerford peoples' views. I am not the only person whose responses were ignored at Regulation 14 consultation and whose responses are not listed in Appendix A. I am submitting my responses again (and more) below at Regulation 16 consultation.

2. Furthermore, the huge majority of the Hungerford residents' responses at Regulation 14 consultation are **opposed** to Land at Smitham Bridge Road being allocated for housing development and residents believe the site to be unsuitable for many reasons – see section 10 of the HNP and Appendix A of the HNP 2024-2041 Consultation statement dated October 2024 with residents' comments.

Why therefore, are Hungerford Town Council being allowed to ignore residents' responses and the fact that the massive majority of people are against the housing site allocations on Land at Smitham Bridge Road and continuing to site them on Land at Smitham Bridge Road as stated in Section 10 of the HNP? **This is unfair and does not uphold the majority of the Hungerford residents' responses, views and wishes.**

I believe that HTC (and now WBDC) after receiving so many objections at Regulation 14 consultation, to building houses on Land at Smitham Bridge Road, should re-consider the other site put forward for housing i.e. Land at Salisbury Road. This site received the next number of highest votes for housing development as can be seen in Table 2.1 under 2.11 of the HNP Consultation statement dated October 2024. You will see in 2.9 of the Consultation Statement, that consultations for site options took place in November 2023. You will see in 2.11 of the Consultation statement that 30% of residents favoured Land at Salisbury Road for housing development.

The Land at Salisbury Road also scored best overall **in the SEA Environmental Assessment Report dated February 2024** for the Hungerford Neighbourhood Plan which gives the factual evidence as to why this site is most suitable for housing development. Not the Land at Smitham Bridge Road as detailed in Section 10 of the HNP.

3. In the Agenda Item 10 for WBDC on 27.3.25. Laila Bassett produced a report for the Council dated 20.1.25. She states in item 4.4. of that report that HTC undertook a consultation on the proposed submission version of the HNP between 16.2.24. and 29.3.24. She states that 112 representations were received including one from WBDC. However, unbeknown to her, this is not correct because Hungerford Town Council did not include all my responses.

4. She also states in 4.4. that "whilst changes were made (after the 112 responses were received), these were not substantial enough to change the nature of the plan".

Yet the huge majority of the 112 responses are against the Land at Smitham Bridge Road being listed for housing site allocation as per Section 10 of the HNP. How is that not substantial? Why are Hungerford residents' views being ignored?

5. The majority of the 112 responses clearly state they do **NOT** believe the Land at Smitham Bridge Road to be a suitable site for housing development as detailed in Section 10 of the HNP. The majority of residents' responding do **not** want the site allocation for housing to be on Land at Smitham Bridge Road as stated in Section 10 of the HNP so how can WBDC in Laila Bassetts report, support this site going forward for housing allocation when it goes against the

residents wishes?

6. HTC have not put any detail against each of the resident's responses as to what they have considered at Regulation 14 Consultation. If you read the Hungerford Neighbourhood Plan 2024-2041 Consultation Statement dated October 2024 – Appendix A there are only a few notations against **some** of the residents' responses by HTC. Where there are comments by HTC they seem to have just copied and pasted three comments "Noted, WBC Highways Development Management and Drainage Teams have not objected to the proposals." There is no detail. How can they just say "noted" for example, when the majority of the residents' responses are against building on Land at Smitham Bridge Road? Hungerford Town Council should have removed Land at Smitham Bridge Road for housing site allocations in Section 10 of the HNP.
7. Hungerford Town Council have disregarded the concerns and wishes of the Hungerford people who responded to the Regulation 14 Consultation. The majority of the responses are against building on Land at Smitham Bridge Road as detailed in Section 10 of the HNP.
8. Following Regulation 14 Consultation we now have Laila Bassett's report for WBDC in January 2025, supporting the Land on Smitham Bridge Road being allocated for housing development as detailed in Section 10 of the HNP produced by Hungerford Town Council, yet the majority of the Hungerford residents responding are **against** this Land being allocated for housing. Why is that?
9. Why did Hungerford Town Council **not publish the Strategic Environmental Assessment Report dated February 2024** in the pack of documents they sent to West Berkshire Council when requesting consultation to go to Regulation 16 on 27th March 2025?
10. This is procedurally incorrect and prevents the councillors from reading the evidence in the report which shows that Land at Smitham Bridge Road is unsuitable to be allocated for housing development as stated in Section 10 of the HNP.
11. The SEA Environmental Report dated February 2024 provides factual evidence as to why the Land at Smitham Bridge Road is **not** the best site for housing development as stated in Section 10 of the HNP. The evidence in the report clearly shows a better site put forward for housing allocations was Land at Salisbury Road. (Hung 14) Option 2. Please refer to AECOM page 32 of the SEA Environmental Report dated February 2024. This shows in 6.45 Table 6.1. Conclusions - that Option 2 – Land at Salisbury Road scored best overall against the key themes of the SEA Environmental Report from Biodiversity to climate change and flood risk, community well-being, historic environment, land, soil and water resources, landscape, and transportation.

Yet HTC still chose the Land at Smitham Bridge Road for housing site allocations as stated in Section 10 of the HNP. This is not right in my opinion. HTC have ignored the better site of Land off Salisbury Road. The site with the best access to a housing development off a major A road.

The Land at Salisbury Road also allows for significantly more housing (65) than Land at Smitham Bridge Road (around 44 and allows for future housing development.

I have included later in my response to this Regulation 16 consultation, various points in the SEA Environmental Report dated February 2024 which support my objections to housing development on Land at Smitham Bridge Road as set out in Section 10 of the HNP. Points which HTC chose to ignore when I submitted my response at Regulation 14 consultation.

12. **HTC also did not make available to residents the Strategic Environmental Assessment (SEA) for the Hungerford Neighbourhood Plan – Scoping Report dated December 2023 during Regulation 14 consultation. Residents were not able to read it or make any responses in relation to this document** which WBDC have made available to us at Regulation 16 Consultation. Thank you. **Please note that Chapter 5 of the Basic Conditions**

Document vi Conformity with EU Obligations - states that this Scoping Report was published at Regulation 14 which is not correct. This is another procedural error on the part of Hungerford Town Council and another reason why the consultation process prior to Regulation 16 Consultation has been flawed.

13. Also, there are various points noted in the SEA Scoping Report which support my arguments that Land at Smitham Bridge Road should not be chosen for housing development as stated in Section 10 of the HNP which I have commented on below.
14. Why have Hungerford Town Council ignored the evidence in the SEA Scoping Report which clearly shows that the Land at Smitham Bridge Road should not be allocated for housing, yet HTC have persisted in putting this land in Section 10 of the HNP?
15. In the **Basic Conditions Document dated October 2024 it states under Legal Compliance Check** that in item b Consultation statement – that the statement must contain details of the main issues and concerns raised and how they have been considered – but all my responses have not been published in Appendix A of the Consultation Statement dated October 2024 so this is not legally compliant.
16. The Basic Conditions document also states under WBDC Comments on page 3 item c) that a summary of the main issues and concerns raised as a result of the pre-submission consultation are contained with Appendix A of the Consultation Statement but they are not because all my views were not considered and are not included.
17. The Basic Conditions Document Item d – the pre-submission consultation representations it says can be found within Appendix A which also details the response to each representation received and how they have been considered in the submission version of the plan but not all of mine are included.
18. The Basic Conditions document item d – HTC have **not** considered any of the residents' responses or given information as to why nothing has changed in the land they are submitting for site allocations in Section 10 of the HNP. Many of them just say "noted." Why are we not being listened to?
19. How can it be right in the Basic Conditions to ignore the majority of the Hungerford residents' wishes to **not** build in Land at Smitham Bridge Road.
20. It should be noted by WBDC and the Inspector that the **HELAA report was dated August 2024 so it was done AFTER the Regulation 14 Consultation and residents did not have chance to comment on it.** The Hungerford Neighbourhood Plan Site Assessment Report – August 2024 by HELAA and Appendices A & B carried out for Hungerford Town Council cited a number of reasons why the Land at Smitham Bridge Road **should not be allocated for housing development**, yet Hungerford Town Council have persisted in allocating Land at Smitham Bridge Road for housing development as per Section 10 of the HNP and ignored the HELAA Report. Why is this?
21. The HELAA report in Appendix A, Tab 2a, also recommends that no more than 33 dwellings should be built on Land at Smitham Bridge Road if it were chosen, yet Section 10 of the HNP allocates approximately 44 houses.
22. I have given specific responses later in this response to all the documents made available during Regulation 16 Consultation including the HELAA Report.

Pre-regulation 14 consultation

HTC chose to allocate for housing Land at Smitham Bridge Road in Section 10 of the HNP which they say in their Consultation Statement that they chose after alleged consultation with residents in November 2023 about which sites should be chosen for housing allocation.

Why therefore, did HTC not commission the SEA Environmental Report to examine all the sites put forward for housing development until AFTER they had made this decision following the November 2023 consultations. The report is clearly dated February 2024.? Why is that?

Furthermore, the SEA Environmental Report dated February 2024 gives factual evidence as to why the Land at Smitham Bridge Road is not the best site to allocate for housing. Yet, HTC chose to ignore this report and continued to allocate the Land at Smitham Bridge Road for housing development as detailed in Section 10 of the HNP.

This whole process is flawed.

HTC state in 2.9 - 2.11 of the Hungerford Neighbourhood Plan 2024 – 2041 Consultation Statement dated October 2024 that they carried out consultations in November 2023 on the preferred site housing allocations prior to Regulation 14 consultation.

I do not believe they followed a fair process however because;

- The November 2023 meetings were not well publicised.
- They were not described as consultations to the Hungerford residents.
- The majority of residents did not know about them and
- Hungerford residents were **not** made aware that from these meetings, HTC would decide the housing site allocations for the Hungerford Neighbourhood Plan which are now published in Section 10 of the HNP.
- In November 2023, HTC chose the sites for housing allocations for the HNP based on only 4% of the towns' population of 5864 who gave input about the 5 housing site options presented.
- Table 2.11 of the Consultation statement and points 2.9 – 2.11 refer. Table 2.11 shows that only 243 people responded to the 5 options for housing development from a town population of 5864.
- This supports my point that these critical stages were poorly advertised to the people of the town and the fact that housing site allocations would be chosen at this stage, **was not communicated to the people of Hungerford.**
- 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 HNP at Regulation 14 Consultation. The Hungerford Town population were not made aware of the previous discussion stages or potential housing site allocations at Regulation 14 Consultation.
- Residents were not told at Regulation 14 consultation there were potentially 5 sites for housing allocations.
- If the HNP goes forward to a Referendum, the HTC should list all the 5 housing site options for local people to vote for. Or as a minimum they should be given the ability to vote for Land at Smitham Bridge Road, Cottrell Close and the Salisbury Road.

Please note that I raised all the above points in the Regulation 14 Consultation stage but my comments were ignored by Hungerford Town Council and are not listed in the Consultation Statement – dated October 2024 - Appendix A.

When the HNP went forward to Regulation 14 consultation, only the two site allocations at Smitham Bridge Road and Cottrell Close were published in Section 10 of the HNP. Residents were not informed that another site – i.e. Land at Salisbury Road - which scored better on the SEA Environmental Report on its themes for housing site allocation - had been ignored by HTC. The details of the above are described in sections 2.9 – 2.11 of the Consultation statement.

Summary

I am sure that West Berkshire Council and the Inspector will see, that no matter what other land was available for housing site allocations, regardless of all the residents objections to building on Land at Smitham Bridge Road at Regulation 14 consultation and all the facts in the documentation and reports provided during consultation that I have cited in my response (further details below) showing why this land should not be developed for housing, Hungerford Town Council have ignored these facts and continued to allocate for housing Land at Smitham Bridge Road in Section 10 of the HNP.

They have also ignored my responses to Regulation 14 consultation.

All the evidence is clearly stated in various reports as to why the Land at Smitham Bridge Road should **not** be allocated for housing. This includes the SEA Environmental Report dated February 2024, the Hungerford Neighbourhood Plan Site Assessment Report – August 2024 by HELAA and Appendices, The Strategic Environmental Assessment Scoping Report dated December 2023 etc. I have commented on these reports below to highlight evidence to support my view that Land at Smitham Bridge Road is not suitable to be allocated for housing development. They also support why I feel that this process so far has been unfair and highlight critical facts that Hungerford Town Council appear to have ignored.

I have given responses to these reports later in this 32 page response to Regulation 16 Consultation on the Hungerford Neighbourhood Plan.

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>):	Jill Wareham
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Please indicate which part of the consultation documents that this representation relates to:

Policy:	Hungerford Neighbourhood Plan and Policy Hung 3 and Policy Hung 12
Section/paragraph:	Hungerford Neighbourhood Plan – Section 10 Site Allocations and other paragraphs referred to below Strategic Environmental Assessment (SEA) Environmental Report – dated February 2024
Appendix:	

Comments

I object to building on Land at Smitham Bridge Road for many reasons.

As noted in **Policy Hung12 of the HNP Point K** it states the need to provide a Construction Traffic Management Plan for Smitham Bridge Road and Church Street.

There needs to be an additional point to the **Policy Hung12** for how you plan to **control the significant increase in traffic by adding approximately 44 houses on this site after construction**. 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 and Parsonage Lane) where two cars cannot pass and is already dangerous. There is also a lot of residents parking on Smitham Bridge Road and Church Street where two cars cannot pass and you cannot see oncoming traffic. There have already been accidents down these roads. Also, 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.

5.8 and 5.11 of the HNP and **Policy Hung 3** point 3 says that North Standen Road (access to the housing site allocation to Land at Smitham Bridge Road **in Section 10.6 of the HNP**) is one of the gateways into Hungerford town but this is not a main road. It is a very small, minor single-track, narrow country road where two cars cannot pass. This is the case all along the rest of North Standen Road to the Pelican Pub where you join the A4. North Standen Road is not suitable for

access to a further 44 dwellings.

Another reason why I do not believe that Land at Smitham Bridge Road is suitable for housing development as stated in Section 10 of the HNP.
There will be traffic chaos and potential accidents.

Policy Hung12 of the HNP – Land at Smitham Bridge Road site allocations Section 10.

I object to several points in Policy Hung12 and would also like WBDC to review some of them because they are too vague in their wording for such an important policy regarding housing development.

There are also several actions which surely should have been taken by Hungerford Town Council (HTC) **BEFORE** the Land at Smitham Bridge Road was allocated for Housing development in Section 10 of the HNP to ensure it is suitable;

Policy Hung12 Item a. States the provision of **approximately 44 dwellings**. This is too much for the size of the site and considering that a small part of the eastern boundary being at risk of flooding should not be built on as stated in 10.9 of the HNP. **Other documents published in consultation have stated that the number of dwellings should be 35, 39 maximum.**

Policy Hung 12 should state in **Item a.** "The provision of **up to 44** dwellings". Not approximately 44 dwellings. At Consultation Regulation 14 it said "around 44".

Policy Hung 12 Item d. States "adequate consideration is given to the development guidelines in the North Wessex Downs National Landscape Management Plan." This is too **vague**. It must be specific as to what these are so residents can comment in consultation and builders must comply.

Policy Hung12 Item e. **The HNP should be specific.** It says "the scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011) and will include the protection and enhancement of two features – the hedgerow along North Standen Road and the views from the West." **What does the Assessment say should be provided for?** Residents cannot comment in consultation **and the Policy needs to specify what builders must do.**

Furthermore, the SEA Environmental Report dated Feb. 2024, in 9.44 and 10.12 Recommendations - states that building on the Land at Smitham Bridge Road MUST minimise any potential adverse effects on the landscape. HTC should reference the need for consideration to be given to the NL and its Management Plan in Policy Hung12. The Management plan includes specific development guidelines for sustainable growth in the NL as part of the North Wessex NL.

Policy Hung12 Item f. Is not specific. It says the development design and layout **will be further informed by a full detailed Landscape and Visual Impact Report.** Why has HTC not done this prior to consultation and prior to allocating the Land at Smitham Bridge Road for housing allocation in Section 10 of the HNP? Residents cannot comment on it at Regulation 16 and again, this is **too vague**.

Policy Hung12 Item g. **The public Right of Way should not have lighting so it can be used after dark.** Land at Smitham Bridge Road is in an Area of Natural Beauty and home to various species of wildlife and adjacent to existing houses at Smitham Bridge Road. Lighting will be detrimental to residents living nearby and the wildlife. If there is lighting, it needs to be subdued for the benefit of residents living nearby and wildlife and this should be added to Policy Hung 12 item g.

Policy Hung 12 Item h. Says access should be from North Standen Road. This road is a narrow, minor country road and is single track in the most part with a bad trig in the road where Smitham Bridge Road is adjacent to Church Way and Parsonage Lane heading into the town and **unsuitable** for lots more traffic to enter a housing development. It is not a main road and a gateway to the town

as stated in the HNP. Most motorists choose to avoid it because it is so narrow, dangerous, and indeed two cars cannot pass in the most part.

Policy Hung 12 Item j. Says the provision of a Transport Statement. Again, this is **too vague**. What does this mean? It needs to be specific. Why is there no detail as to what this involves so that residents can comment and builders know what to do?

Policy Hung 12 Item k. Stipulates a Construction Traffic Management Plan must be provided. Please add a new point to the Policy Hung 12 for a Traffic Management Plan to be provided after construction to cope with all the extra traffic on the unsuitable roads of North Standen, Smitham Bride and Church Street.

Policy Hung12 Item m. States that a **Flood Risk Assessment** will be required and a **Surface Water Drainage Strategy** implemented to contribute to a reduction in flood risk downstream. Again, why have HTC not done this before the Land at Smitham Bridge Road was allocated in 10 of the HNP for housing allocation to ensure the land was suitable for housing?

Item o. States that the scheme must be informed by an **Ecological Impact Assessment** on protected habitats. Again, why has HTC not done this before the Land at Smitham Bridge Road was allocated in Section 10 of the HNP for housing allocation to ensure the land is suitable for housing.

Item p. States **the potential hydrological impacts of development on the Freemans Marsh SSSI are fully assessed and appropriate mitigation provided if required.** Again, why has HTC not done this before the Land at Smitham Bridge Road was allocated in Section 10 of the HNP for housing allocation to ensure the land is suitable for building on when it is near a site of scientific interest and the impacts on the marsh could be catastrophic.

Item q. States “**a desk based archaeological assessment should be undertaken.**” Again, why has HTC not done this before the Land at Smitham Bridge Road was allocated in Section 10 of the HNP for housing allocation to ensure the land is suitable? And how is a desk-based assessment deemed to be suitable?

In the original HNP dated December 2023 that was shown to us at Regulation 14 Consultation, there was an item j. which stated “**Provision of Sustainable Draining Systems (Suds) to the satisfaction of the lead flood authority.**” This point is not in the current HNP Policy Hung12 dated October 2024 which has been published for Regulation 16 Consultation. Why is that? Should this not be included as the land is susceptible to flooding and has flooded in the past?

Surely if HTC have not done all these assessments and reports etc., - Land at Smitham Bridge Road for housing site allocations in Section 10 of the HNP, **should be removed because it is not proven to be a suitable site. The majority of the points in Policy Hung12 are also far too vague.**

It also reaffirms my point that this agricultural land, in an area of natural beauty and being part of the North Wessex National Landscape. The land at Smitham Bridge Road should **not** be built on because it will adversely impact on the special qualities of the NL

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

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

Policy:	Hungerford Neighbourhood Plan and Policy Hung12.
Section/paragraph:	Hungerford Neighbourhood Plan – Section 10 Site Allocations. Strategic Environmental Assessment – SEA Environmental Report dated February 2024.
Appendix:	

Comments

I object to building on Land at Smitham Bridge Road as per Sections 10.4 – 10.13 of the HNP & Policy Hung12 of the HNP.

The Land at Smitham Bridge Road - HNP Site Allocations Section 10.5 - by building approximately 44 dwellings 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. **Please see attached pictures.** Please also note that these pictures were **not included in my response to the Regulation 14 consultation by Hungerford Town Council.**

10.5 of the Hungerford Neighbourhood Plan should be amended to state “the site is allocated to deliver **up to 44 dwellings not around**”. Currently it states “approximately 44 dwellings”. This is too much for the size of the land.

10 of the HNP - Land at Smitham Bridge Road – HNP Site Allocations Section 10 is a long way from

the primary and secondary schools and leisure facilities as confirmed in the SEA Environmental report dated February 2024 – See point 6.46.

The Land at Smitham Bridge Road – HNP Site Allocations Section 10 **was previously rejected by WBDC for housing development on more than one occasion**. WBDC said this site was unsuitable for housing for several reasons including the risk of flooding and the fact the land is on a significant slope from the West side.

The risk of flooding will be worsened by building houses on the land at Smitham Bridge Road above the stream and has flooded previously.

Why are Hungerford Town Council (HTC) now proposing in Section 10 of the HNP - that this Land at Smitham Bridge Road is suitable for housing development when WBDC rejected it in the past?

The Land at Smitham Bridge Road – HNP Site Allocations Section 10 is also next to the industrial estate which is not a good mix for housing.

The Land at Smitham Bridge Road – HNP Site Allocations Section 10 still has an increased flood risk. I object to 10.9 of the HNP – it acknowledges the flood risk but states there is a low fluvial flood risk. I have seen Smitham Bridge Road flooded more than once in recent years. Pictures attached.

10.11 of the HNP – Land at Smitham Bridge Road – states that a Flood Risk Assessment must accompany any future planning application. **Surely HTC should have done this before putting the Land at Smitham Bridge Road in Section 10 of the HNP for housing development?**

10.6 of the HNP says that access to the Land at Smitham Bridge Road will be from North Standen Road. This is a minor, single-track, narrow road where two cars cannot pass.

10.7 of the HNP – Site Allocations Section 10 – states that the Public Right of Way should be upgraded so that it is capable of year-round use, including after dark by way of suitable lighting. It further states that Section 106 contributions should be secured following engagement with the Local Highway Authority to ascertain the most appropriate scheme of amendments.

I object to this ancient public right of way being floodlit. This land is in the countryside, in an area of natural beauty. To put flood lights will be detrimental to the well-being of the residents living nearby and detrimental to the wild life that reside on and near to this land, such as door mice, bats, badgers, and deer.

10.8 of the HNP states that A 2011 Landscape Sensitivity Assessment (LSA) concluded that development on the site would result in little harm to the natural beauty of the National Landscape, **“subject to specified protection and enhancement measures”**. **Furthermore, that “recommendations of the LSA have been incorporated into the policy.”** Please may WBDC/The Inspector review that they have been incorporated because the HNP does not say what they are. It also does not state what the protection and enhancement measures are? What are they? We cannot comment in consultation on them. Also, because nothing is specified in the HNP. Builders cannot be held accountable to comply.

Also 10.8 states that **“Development will also be further informed by a Landscape and Visual Impact Assessment” – what does this mean?**

Again, **why has HTC not carried this out before allocating** the Land at Smitham Bridge Road in 10 of the HNP for housing development?

And **before** the HNP proceeds further through consultation? Residents are unable to give responses to the unknown.

The Land at Smitham Bridge Road – HNP Site Allocations Section 10 is not near the primary or secondary schools. Option 2 – Land at Salisbury Road is. This site was put forward for housing in the SEA Environment Report dated February 2024 and scored best for housing as detailed in Table NTS.2 – Summary of assessment of reasonable alternative options in the SEA Environmental Report. Page AECOM iv). This site is also not prone to flooding or likely to increase the risk of flooding to other properties, would not cause any significant traffic issues, is not situated by an industrial estate and is close to two recently built new housing developments, has space for allotments (as described in Hungerford Town Councils November 2023 consultations) and has room for larger green spaces. It would also minimise the impact of traffic on Hungerford town especially in school pick up and drop off times and work rush hour. Furthermore, the access would be off a wide main road – the A338 giving good access.

10.10. of the HNP states there is a 1 in 30-year risk of flooding but I have seen it flood more than once in less than 30 years. Pictures attached.

10.12 of the HNP with the chalk stream adjacent to the site is another reason that Land at Smitham Bridge Road should not be built on. Plus, it is close to Freemans Marsh which is protected land and will be at risk of potential flooding if houses are built on Land at Smitham Bridge Road.

10.13 of the HNP – Section 10 – Site allocations on Land at Smitham Bridge Road, states that a **desk top assessment** of the site by Thames Valley Environment Research centre has been done which identifies that development has a **medium risk** of adverse nature conservation impacts.

I object to this desk top assessment. A proper site visit should have been carried out before the Land at Smitham Bridge Road has been allocated for housing development in Section 10 of the HNP.

A **medium risk** should **rule this site out for housing** and is another reason I object to it being allocated for housing.

10.13 of the HNP also states than an appropriate Ecological Impact Assessment (EclA) will need to inform development. Again, surely this should have been done by HTC **before** the Land at Smitham Bridge Road has been allocated in the HNP section 10 for housing development?

Once again, there is lots of evidence above as to why this Land at Smitham Bridge Road should not have been allocated for housing as per Section 10 of the HNP. It seems that no matter what is said, HTC have persisted in allocating this site for housing, when they have a perfect alternative site on Land at Salisbury Road which is a long way from Freemans Marsh, is not near a chalk stream, has no risk of flooding and is close to the schools etc. It is also off the major A338 providing excellent access to the site and scored best as the most suitable site for housing development in the Strategic Environmental Assessment -Environmental Report dated February 2024.

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>):	Jill Wareham
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Please indicate which part of the consultation documents that this representation relates to:

Policy:	Hungerford Neighbourhood Plan – Policy Hung 12
Section/paragraph:	Hungerford Neighbourhood Plan – Section 10 Site Allocations Strategic Environmental Assessment (SEA) – Environmental Report for the Hungerford Neighbourhood Plan – February 2024
Appendix:	

Comments

In Policy Hung12 of the HNP – item a and 10.5 of the Site allocations - it is proposed to build approximately 44 dwellings on Land at Smitham Bridge Road. However, in previous housing development proposals for this site, it was proposed to build 35 dwellings which was **rejected** by West Berkshire Council. I do not understand what has changed from the previous rejection by WBDC?

44 houses on land of 2.11 hectares is too much for the size of the Land at Smitham Bridge Road as described in Section 10 of the HNP and I object to building on this land.

As can be seen from the facts in the SEA Environmental Report dated February 2024 the site which scored much better to be used for housing allocation in section 10 of the HNP would be Land at Salisbury Road. **Point 6.45, table 6.1 of the SEA Environmental Report** on page AECOM 32 shows the evidence where Land at Salisbury Road scored better for housing development than Land at Smitham Bridge Road.

Point 6.46 of the SEA Environmental Report states with reference to biodiversity and geodiversity, climate change and flood risk and community wellbeing, Land at Salisbury Road (Option 2) is the most favourable option. A point I raised at Regulation 14 Consultation but was ignored by Hungerford Town Council.

Land at Salisbury Road also offers 65 dwellings as opposed to 44 on Land at Smitham Bridge Road but also has lots more land to give the opportunity for further development in future years. It is also close to Lancaster Park and Kennedy Meadow where recent new housing has been built and provides excellent access for transport to and from the site. Access off the A338 which is a major road gateway into the town to the housing site where WBDC have recently spent money on the A338 road to widen it for housing sites access and they have built new roundabouts to carry extra traffic.

Part B – Your Representation

Please use a separate sheet for each representation

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

Policy:	Hungerford Neighbourhood Plan Section 10 Site Allocations 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 HNP Consultation Statement Appendix A by Hungerford Town Council (HTC) **which clearly shows that the majority of the 112 residents' 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 for various reasons.** These include traffic problems and some have noted the previous floods and future flood risks etc.

Why have HTC ignored the views of the majority of the respondents and continued to allocate Land at Smitham Bridge Road for housing development in section 10 of the HNP and taken this forward to Regulation 16 Consultation?

Hungerford Town Council should have stopped the consultation at this point and replaced the Land at Smitham Bridge Road and allocated land off Salisbury Road for housing in Section 10 of the HNP which is the best site for site allocations as stated in the Strategic Environmental Assessment – Environmental Report dated February 2024. It was also the site that received the next number of the highest votes at the alleged consultations in November 2023 about which site(s) should be chosen for housing allocations.

As stated previously, my responses to the Regulation 14 consultation were **ignored** by Hungerford Town Council when I raised several objections to Section 10 of the Hungerford Neighbourhood Plan because I object to the site allocations to build on Land at Smitham Bridge Road. My responses to the Strategic Environmental Report - SEA Environmental Report dated February 2024 were also excluded as previously stated. This is unfair and procedurally incorrect.

Part B – Your Representation

Please use a separate sheet for each representation

Your name or organisation (and client if you are an agent):	Jill Wareham
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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 of the Hungerford Neighbourhood Plan And sections 6.38 and 6.48 of the SEA Environmental Report for the Hungerford Neighbourhood Plan dated February 2024
Appendix:	

Comments

The Hungerford Neighbourhood Plan states in its **objectives in 3.2. 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 in Section 10 to build housing on greenfield Land at Smitham Bridge Road which I object to. This does not consider that the Land at Smitham Bridge Road is in a designated area of natural beauty and is in the countryside. I object to this land being used for development. It is a greenfield site and therefore goes against everything in this objective. It is also outside of the town boundary. There will be a significant negative effect on greenfield lands lost in the NL as stated in **6.38 and 6.48, pages AECOM 22 & 33 of the SEA Environmental Report** dated February 2024.

This is also land which has the potential to lead to significant negative effects in relation to the landscape SEA Environmental Report theme.

A better option would be to build on land at Salisbury Road which would meet objective 3.2. There are already housing developments close by at Lancaster Park and Kennedy Meadow. **As stated in the SEA Environmental Report** dated February 2024, access to the site would be off the A338 - a

major wide road with good access already built. It is also close to both schools, leisure, and education facilities.

The SEA Environmental Report 6.46 supports building houses at Salisbury Road and confirms that it will exceed the current local housing needs all on one site on the edge of the town with the potential to deliver a mix of homes that are well located to access local services and facilities/amenities (without significant exacerbating existing capacity issues). 6.44 of the SEA Environmental Report states that Option 1 Land at Salisbury Road ranks the highest as it has the closest proximity to public transport networks and the town centre and is immediately adjacent to cycle paths and PRoW.

Part B – Your Representation

Please use a separate sheet for each representation

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

Policy:	Hungerford Neighbourhood Development Plan Strategic Environment Assessment (SEA) Environmental Report for the Hungerford Neighbourhood Plan – Environmental Report dated February 2024.
Section/paragraph:	HNP – 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 (HTC) 45 of their 56-housing quota on a **brownfield** site which the SEA Environmental Report dated February 2024 states brownfield sites should always be the first choice.

But HTC ignored this brownfield site and did not put this site in Section 10 for housing development in the Hungerford Neighbourhood Plan during the consultation at Regulation 14 or Regulation 16. Why is that?

Putting this site into the town plan would have negated the need to allocate Land at Smitham Bridge Road for housing as per Section 10 of the HNP.

The Hungerford Development plan states in its objectives in 3.2. that where possible housing should be allocated on **previously developed sites** which would make the land adjacent to the Railway

Tavern fulfil this objective.

HTC also states in **Objective A of Section 10 Site Allocations** – “allocate sites to meet the housing requirements in the West Berkshire Local Plan Review to 2041, where possible making best use of previously developed land and minimising encroachment into the countryside.”

The SEA Environmental Report also states that brownfield sites should be chosen **before** greenfield land.

So, why did HTC choose to allocate greenfield Land at Smitham Bridge Road in 10 of the HNP for approximately 44 houses?

This does not fulfil their own objective or the objective in the SEA Environmental report that brownfield sites should be chosen before greenfield sites. I object to building houses on this land.

Part B – Your Representation

Please use a separate sheet for each representation

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

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

Comments

Please refer to 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 HNP because in the SEA Environment Report more suitable sites were put forward to Hungerford Town Council (HTC). 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 and WBDC have already spent money building the appropriate infrastructure to give access to this site. It also allows for additional allotments within the town.

It makes no sense how HTC have concluded to choose Land at Smitham Bridge Road for housing development in Section 10 of the HNP, over Salisbury Road.

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Part B – Your Representation

Please use a separate sheet for each representation

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

Policy:	Hungerford Neighbourhood Plan – Section 10 Site Allocations Strategic Environmental Assessment (SEA) Report for the Hungerford Neighbourhood plan. Dated February 2024.
Section/paragraph:	HNP Section 10. Strategic Environment Assessment (SEA) for the Hungerford Neighbourhood Plan – Environmental Report dated February 2024. 6.38
Appendix:	

Comments

The HNP allocates in section 10 housing on Land at Smitham Bridge Road which I object to. This does not take into account that this land is in a designated area of natural beauty as described in the SEA Environmental Report 6.38. The report states that by building on land at Smitham Bridge Road, there will be **a significant negative effect on greenfield agricultural land lost in the NL.**
Hungerford Town Council should therefore choose a more suitable site identified i.e. Option 2 Land at Salisbury Road.

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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>):	Jill Wareham
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Please indicate which part of the consultation documents that this representation relates to:

Policy:	Hungerford Neighbourhood Plan – Section 10 Site Allocations Strategic Environmental Assessment (SEA) Environmental Report for the Hungerford Neighbourhood plan. Dated February 2024. Hungerford Neighbourhood Plan 2024 – 2041 Consultation statement dated October 2024 and Appendix A
Section/paragraph:	Various paragraphs marked below from the Strategic Environmental Assessment (SEA) Environmental Report – February 2024 The HNP section 10 Consultation Statement dated October 2024
Appendix:	Consultation Statement dated October 2024 Appendix A

Comments

All of my responses below about the SEA Environmental Report dated February 2024 were excluded by Hungerford Town Council (HTC) from Regulation 14 Consultation and I am raising them again here because they are not listed in Appendix A of the Consultation Statement dated October 2024. I object to building on Land at Smitham Bridge Road and the SEA Environmental Report provides the evidence to support this.

I am also raising them because HTC have gone against the evidence in the SEA Environmental Report and chosen Land at Smitham Bridge Road for housing site allocations in Section 10 of the HNP when the evidence in the SEA states it should not have chosen this site. Also, the SEA Environmental Report evidence shows that a better site is the Land at Salisbury Road.

Plus, Hungerford Town Council did not commission the SEA Environmental Report until February 2024 when they had already chosen to allocate Land at Smitham Bridge Road for housing development in Section 10 of the HNP in November 2023?

I object to the Site Allocations for Housing as stated in Section 10 of the HNP.

6.6 of the SEA Environmental Report – Biodiversity - states that “Hun 7 Land at Smitham Bridge Road falls within SSSI Impact Risk Zones (IRZ), this is for development of more than 50 units. Growth proposed of 44 homes would not meet this threshold and therefore consultation with Natural England would not be required”. I believe that HTC should have consulted with them given that around 44 dwellings are proposed on this site and the land is in an area of natural beauty. It is also important to note that originally, HTC were proposing to build around 55 houses – thankfully the number has dropped but is this why HTC have reduced the number of dwellings?

6.8 of the SEA Report – Biodiversity states that there will result in a loss of greenfield sites that have a role in supporting local biodiversity networks. Given the nature of the agricultural land at Smitham Bridge Road and all the evidence in the SEA Environmental Report to suggest houses should NOT be built on Land at Smitham Bridge Road, it is imperative that HTC should consult with Natural England to give their assessment on the proposed sites before the HNP goes any further.

6.11 of the SEA Environmental Report – Biodiversity – clearly states that **Option 2 – Land at Salisbury Road is best for biodiversity. Not option 1 – Land at Smitham Bridge Road.** Why therefore, did HTC not choose Option 2 to put the housing on Land at Salisbury Road in Section 10 of the HNP?

6.22 of the SEA Environmental Report – Community Wellbeing.

I object to building on the Land at Smitham Bridge Road which is allocated for housing development in Section 10 of the HNP. It is not the best site. 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 HTC chosen Option 1 to build on land at Smitham Bridge Road? Option 2 Land at Salisbury Road is the site which should be chosen for housing development.

6.16 to 6.22 of the SEA Environmental Report Community Wellbeing – all comments here in the SEA Environmental Report, support why the better site for housing site allocations in Section 10 of the HNP should be the land off Salisbury Road. Not the Land at Smitham Bridge Road.

Also to support my objections to building on Land at Smitham Bridge Road as stated in Section 10 of the HNP are the following points from the Strategic Environmental Report SEA dated February 2024 are relevant;

6.18 of the SEA states that Option 1 Land at Smitham Bridge Road is “outside of the preferred maximum distance over 2km – to either one or the other of the two schools. Salisbury Road

(Hun 14) is considered to perform most positively as it is adjacent to the secondary school and within 1km of the primary school”.

6.19 of the SEA states that Option 2 – Land at Salisbury Road scored **most positively in terms of access to health and education facilities in the town.**

6.20 of the SEA states that option 2 Land at Salisbury Road performed **most positively for greater benefits for physical and mental health**

6.21 states that option 2 – Land at Salisbury Road – is best performing as it delivers a moderate level of growth and is well located to access to health & education facilities as well as having increased potential to deliver on site amenities/improvements.

6.46 of the SEA conclusions states that “with regard to biodiversity and geodiversity, climate change and flood risk and community well-being, Option 2 – Land at Salisbury Road is the most favourable option”. Not Land at Smitham Bridge Road as listed for housing in Section 10 of the HNP.

Given the above evidence, why have HTC chosen Land at Smitham Bridge Road for housing development and not the better option as stated in the SEA Environmental Report i.e. Land at Salisbury Road?

6.45 & table 6.1 of the SEA Environmental Report.

In the **Conclusions** of the SEA Environmental Report – Page AECOM 32, option 2 overall – **Land at Salisbury Road, had the best overall scoring on the whole report to be used for housing development.** Not Option 1 – Land at Smitham Bridge Road. So why have HTC chosen Option 1 i.e. to build houses on Land at Smitham Bridge Road as shown in Section 10 of the HNP which I object to? If you add up all the scores against each of the SEA Environmental Report themes, the lowest scoring site is Option 2 Land at Salisbury Road (lowest being best). Not the Land at Smitham Bridge Road.

6.12 to 6.15 of the SEA Environmental Report Climate change and flood risk

In the table of **Significant Effect** (just above 6.12), Option 2 Land at Salisbury Road scored **best.**

Why therefore, have HTC not chosen this site as the one for housing development in Section 10 of the HNP as it is much more suitable site?

6.14 of the SEA Environmental Report points out the flood risks of Land at Smitham Bridge Road and yet again, HTC have proposed to build approximately 44 houses above the eastern side in Section 10 of the HNP.

6.15 of the SEA Environmental Report states that Option 2 – Land at Salisbury Road is the “best performing site, directing a lower level of growth to a site not contained by flood risk”. Why are HTC going against this report and chosen to build on Land at Smitham Bridge Road as stated in Section 10 of the HNP?

9.41 of the SEA Environmental Report – Landscape

The SEA Environmental Report 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 and is unsuitable as an access to a housing estate.

For HTC to state that this is a suitable access road and a gateway to Hungerford town is ridiculous. They have stated in 10.6 of the HNP that access to the site will be from North Standen Road which I object to. It is too narrow and single track.

Option 2 – Land at Salisbury Road is a much better option for housing development with good

vehicular access off the main A338 road. This road has recently been widened and roundabouts added to it at a cost to West Berkshire Council, when building Lancaster Park and Kennedy Meadow.

6.32 of the SEA Environmental Report – Landscape – states that Land at Smitham Bridge Road sits within the North Wessex National Landscape which needs to be taken into consideration through development so as to not adversely impact on the special qualities of the NL. The site sits within the Hungerford Farmland Character Area of the North Wessex NL. **This area has the overall management objective to conserve and enhance the quiet, rural, agricultural character of the Hungerford Farmland.** Therefore, why have HTC chosen this site for housing development as per Section 10 of the HNP?

6.38 of the SEA Environmental Report states that building on the Land Smitham Bridge Road has the potential to lead to **significant adverse** effects on the landscape, reflective of the greenfield nature of sites within the NL. Therefore, I object to housing development here as stated in Section 10 of the HNP.

If WBDC do approve the housing to go ahead at this site, then HTC need to ensure the points in **6.38 are adhered to** i.e. that significant adverse effects could be avoided, **particularly if supported by landscape-led master planning and green infrastructure provision.**

6.48 of the SEA Environmental Report states in its conclusions that “taking a precautionary approach, all options concluded as having the potential to lead to significant effects at this stage in relation to the SEA theme. This reflects the loss of greenfield land in the NL.”

11.5 of the SEA Environmental 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 HNP, based on only 4% of the town’s population input at discussion stages in November 2023? This is unfair. Only 243 people responded out of a population of 5864.

7.7 of the SEA Environment Report – Assessing Reasonable Alternatives – states that “Option 1 – Land at Smitham Bridge Road has therefore been identified as the preferred Option reflective of the consultation responses set out in table 7.1 and the findings of the SEA. This was presented to Hungerford Town Council who unambiguously agreed with this approach.”

How can this be fair when 6.48 of the SEA Environmental report said that “all options are concluded as having the potential to lead to **significant negative effects** at this stage in relation to the landscape theme”

AND

when the evidence in the SEA Environmental Report – especially the facts in **Assessing Reasonable Alternatives Table NTS.2** on page AECOM iv **showed that the Land at Salisbury Road was the best option.** Overall, it scored 11 – lowest being best. It was specifically the most favourable site for development in relation to Biodiversity & geodiversity, climate change and flood risk and Community wellbeing compared to Smitham Bridge Road.

AND

When only 4% of the Hungerford population supported Land at Smitham Bridge Road to be chosen in the HNP Section 10 for housing development. That was because people did not know that from the November 2023 meetings, the housing site allocations would be chosen. And there was no proper consultation and communication about it as previously stated.

Section 3 of the SEA Environmental Report – Table 3.1 Scoping consultation responses – states that **no response has been received from Natural England**. Based on this fact, HTC should not have proceeded to allocate Land at Smitham Bridge Road for housing development as per section 10 of the HNP.

Section titled recommendations of the SEA Environmental Report on page vi & vii - states that **no Conservation Area Appraisal (CAA) has been carried out on the options for housing sites as stated in Section 10 of the HNP. The SEA states that this is a clear evidence gap for the neighbourhood area.** Why has this not been done prior to the HNP going into Regulation 16 consultation?

Also why have the PPG and Historic England not been asked to report as stated on page vi of the SEA Environmental Report? This should have been done before the HNP goes further because they may raise concerns about building on Land at Smitham Bridge Road as proposed in section 10 of the HNP.

It should be checked also by the Inspector that HTC have reduced the potential number of dwellings to be built on Land at Smitham Bridge Road as per section 10 of the HNP from 55 to approximately 44 which rises the question as to whether the number has been scaled down beneath the threshold upon which they are required to consult under local government rules.

Part B – Your Representation

Please use a separate sheet for each representation

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

Policy:	Hungerford Neighbourhood Plan Section 10 Site Allocations and Policy Hung12 Hungerford Neighbourhood Plan Habitats Regulation Assessment Report dated January 2024
Section/paragraph:	
Appendix:	A. Policy Screening Tables of the Hungerford Neighbourhood Plan Habitats Assessment report dated January 2024. Paragraph Hung 12. Land at Smitham Bridge Road

Comments

I believe that it has been missed out of the HNP Section 10 that the Hungerford Neighbourhood Plan Habitats Regulation Report dated January 2024 stated that Hungerford Town Council (HTC) needed to provide **appropriate vehicle access from North Standen Road (bullet point 4)**

There is nothing in the HNP Policy Hung12 to state what needs to be done. It should be specified what **appropriate access** means and what builders need to do.

Part B – Your Representation

Please use a separate sheet for each representation

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

Policy:	The Hungerford Neighbourhood Plan Site Assessment Report – August 2024 by HELAA and Appendices carried out for Hungerford Town Council And Hungerford Neighbourhood Plan – Section 10 Site Allocations
Section/paragraph:	Various as marked
Appendix:	Appendices A & B excel spreadsheets of the HELAA Report.

Comments

The HELAA HNP Site Assessment Report and Appendices A & B highlight various **reasons why the Land at Smitham Bridge Road should not be chosen for housing development** as detailed in the HNP Section 10 and they support the reasons why I object to building on Land at Smitham Bridge Road. The Land at Smitham Bridge Road is referred to as HUN7.

It should also be noted by WBDC and the Inspector that the HELAA report is dated August 2024 so it was done AFTER the Regulation 14 Consultation in Feb/March 2024 yet Hungerford Town Council have persisted in allocating Land at Smitham Bridge Road for housing development as per Section 10 of the HNP.

Appendix A – Tab 2a. Development Potential states;

- On row HUN 7 Land off Smitham Bridge Road is stated in Column M – row 7 as “having fluvial and surface water flood risk” so why has Hungerford Town Council (HTC) chosen this land for site allocations?
- On row HUN 7 Land off Smitham Bridge Road in Column N it says that “**up to 31 dwellings** should be on Land at Smitham Bridge Road BUT known flooding issues exist which may reduce the number”. Why therefore are Hungerford Town Council stating that approximately 44 houses should be built on Land at Smitham Bridge Road as per Section 10 of the HNP?
- So why has Smitham Bridge Road been chosen for development when it is a flood risk? And

Why are HTC proposing in the HNP to put around 44 dwellings in the Neighbourhood plan at 10.5 on the site and **not 31 as recommended by HELAA?** The Hungerford Neighbourhood plan housing number at Land off Smitham Bridge Road should be amended to follow the HELAA recommendation.

Appendix Tab 2b Suitability of the HELAA Site assessment spreadsheet in Column C on row HUN 7 it states that ***planning applications were refused in May 1992 and January 1983*** so why are HTC proposing to build around 44 houses on Land at Smitham Bridge Road now?

It also states that Land at Smitham Bridge Road is **NOT recommended for allocation in the HAS DPW due to flooding and access concerns and Smitham Bridge Road is very narrow**. Why therefore has Land at Smitham Bridge Road been allocated in section 10 of the HNP?

It should be noted that that West Berkshire Council rejected HTC's proposal to build on land at Smitham Bridge Road within the last 5 years and told them to build the new housing on land off Salisbury Road – now called Lancaster Park. That was because the land at Smitham Bridge Road was deemed an unsuitable site by WBDC. This has been omitted from any of the Regulation 16 Consultation.

The HELAA also notes that the line Hun7 Column D is outside the settlement boundary of Hungerford. Another reason it was **deemed an unsuitable site for housing**.

The HELAA also noted that Hun7 is within an area of natural beauty in Column E and **deemed it to be an unsuitable site for housing**.

The HELAA also noted that Hun 7 Column G was **not supported by West Berkshire Highways team for development due to accessibility concerns**.

The HELAA said that Hun 7 Columns J & K **was unsuitable for housing development due to the flood risks**.

The HELAA also made various comments about Hun7's unsuitability for development in Column S relating to the adverse nature of the conservation impacts of developing this site.

The HELAA said in Column T that Hun7 had protected species on the site which makes it **unsuitable for development**

The HELAA report states on row Hun7 Column AF that **further ecological surveys are required and allocation would be dependent on the resolution of highways and flooding concerns and review of the settlement boundary. Why have Hungerford Town Council not done these surveys?**

The HELAA also states on row HUN7 that “**suitability assessment is unknown**”. So why have HTC chosen to allocate Land at Smitham Bridge Road for housing in Section 10 of the HNP?

Appendix B of the HELAA Report highlights various reasons why the Land at Smitham Bridge Road should not be chosen for housing development as stated in Section 10 of the HNP and supports my opposition to building on this site.

On the Tab Hun7 Shalbourne it states;

Column D row 6. States that the promoter is proposing a developable area of 1.3HA. Promoter is proposing 39 dwellings at a density of 30dph, which is considered reasonable for the site”.

Why therefore, does the HNP state that approximately 44 dwellings are to be built on Land at Smitham Bridge Road in Section 10 of the HNP?

Column D. Row 11. States the site at Smitham Bridge Road is **not good for older people being distant from shops and services.**

Column D. Row 1 states the land it is a negative assessment. Wholly greenfield site and Council should pick a brownfield site first.

Column D. Row 17. A negative assessment. States; Outside preferred maximum distance to the town centre. 995m distance, +23 /-22m elevation. Along Smitham Bridge Road and Church Street to High Street. All with pavements. Road crossings Smitham Bridge Rd and Church St

Column D Row 19. Negative assessment. Distance to the schools - Outside preferred maximum distance.

Column D. Row 33. States that being on the edge of the town site is **not well located to access shops, services, and schools.**

The HELAA report – August 2024 in Table 2.1 states that “where possible making best use of previously developed land and minimising encroachment into the countryside”. The land at Smitham Bridge is greenfield and, in the countryside, so why have HTC chosen this site for housing development?

HTC already had a brownfield site adjacent to The Railway Tavern pub for allocation of 44 houses but this has been excluded from the HNP in Section 10 site allocations. Why is that?

Given the HELAA Reports evidence, why are HTC being allowed to ignore this and continue to allocate a housing site on Land at Smitham Bridge Road in Section 10 of the HNP?

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>):	Jill Wareham
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Please indicate which part of the consultation documents that this representation relates to:

Policy:	Strategic Environmental Assessment (SEA) for the Hungerford Neighbourhood plan Scoping Report. Dated December 2023 And the Hungerford Neighbourhood Plan Section 10 Site Allocations Policy Hung12
Section/paragraph:	Various – as marked including 5.10 and 5.11
Appendix:	

Comments

The Strategic Environmental Assessment (SEA) for the Hungerford Neighbourhood Plan Scoping Report dated December 2023, was not made available to residents at Regulation 14 Consultation in February/March 2024 which I feel is procedurally incorrect and unfair.

There are various points noted in the SEA Scoping Report which support my argument that Land at Smitham Bridge Road should not be chosen for housing development as stated in Section 10 of the HNP.

The Scoping Report states in 5.10 SEA Objective is to “Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change.”

5.11 states that supporting assessment questions include (will the option / proposal...);

* The first bullet point says; - “reduce the number of journeys made and reduce the need to travel.”

My response is that the Land at Smitham Bridge Road – identified for housing in the HNP Section 10 should not be built on because it will **increase journeys** made by people living on the outskirts of the town e.g. to get to the town and the schools etc.

*The sixth bullet point says that it should “**avoid development in areas of fluvial flooding**, taking into account the likely future effects of climate change.” 10.9 of the HNP states that the Land at Smitham Bridge Road allocated for housing in Section 10 of the Plan **does have the risk of fluvial flooding**. So, why are Hungerford Town Council (HTC) choosing this land for housing site allocations?

The SEA Scoping Report states in 4.5 that there is a **designated SSSI at Freemans March SSSI**. **Building on Land at Smitham Bridge Road – 10 of the HNP will affect this. The land at Smitham Bridge Road is very close to the marsh.**

As stated in 4.10 of the SEA the NP should seek to protect the SSSIs within the neighbourhood area. The risk of flooding at the site will have a potentially adverse effect on the Marsh and its protected species.

Also, the **water quality** will be affected not only at Freemans Marsh but into the River Shalbourne which runs to the East of the proposed housing development on Land at Smitham Bridge Road (Section 10 of the HNP).

7.11 of the SEA Scoping Report notes that the lack of CAAs and management plans for the conservation areas present a *gap in the evidence base and that Hungerford Town Council should seek to work with West Berkshire to develop the evidence base in this respect.*

This has not been done prior to allocating in the HNP, section 10 Land at Smith Bridge Road to be built on.

Objective 8.9 of the SEA Scoping Report states that in relation to Land, soil, and water resources – Ensure the efficient and effective use of land and protect and enhance water quality, using water resources in a sustainable manner.”

Objective 8.10 states that HTC should **Promote the use of previously developed land wherever possible**. HTC did **not** include the brownfield land located adjacent to the Railway Tavern which was previously occupied for Oakes Brothers. There was a recent planning application on this land for around 44 houses which would have given HTC the housing target along with Cottrell Close and avoided the need for them to propose to build around 44 houses on Land at Smitham Bridge Road as detailed in Section 10 of the HNP. Why did HTC not include this in the HNP?

Another bullet point at 8.10 states that they **should avoid the development of BMV agricultural**

land. Why therefore, are HTC allocating in Section 10 of the HNP to build houses on the agricultural land at Smitham Bridge Road?

A key issue noted in the SEA Scoping Report states that “**due to the location of the neighbourhood area within the North Wessex Downs NL, the Hungerford Neighbourhood Plan should have regard to its setting and to the aims and objectives of the North Wessex Downs AONB Management Plan.**”

For these reasons, I object to housing on Land at Smitham Bridge Road as per Section 10 of the HNP. Section 10 does not include the above Management Plan.

Or if it is decided there is to be housing here, it should be added to Policy Hung12 in the HNP that this must be considered when developing Land at Smitham Bridge Road in Section 10.

Finally, under **Key Issues** in the SEA Scoping Report it states in 10.7 that “**future development has the potential to increase the number of vehicles on local roads.**” This could exacerbate existing traffic and congestion during peak periods etc.”

I object to the site allocations on Land at Smitham Bridge Road as stated in Section 10 of the HNP because North Standen Road, Smitham Bridge Road and Church Street leading to the town centre are narrow single-track roads unable to cope with the extra traffic created by building around 44 houses on Land at Smitham Bridge Road. This will cause congestion and chaos especially in peak periods. There is also residents parking on these roads and you cannot see round them to pass and avoid on-coming traffic.

Part B – Your Representation

Please use a separate sheet for each representation

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

Policy:	Hungerford Neighbourhood Plan Section 10 Site Allocations Hungerford Neighbourhood Plan – Basic Conditions Statement – dated October 2024. Prepared by LUC.
Section/paragraph:	
Appendix:	

Comments

In the **Hungerford Neighbourhood Plan – Basic Conditions statement dated October 2024** it states various points that support my objection to building on Land at Smitham Bridge Road as stated in Section 10 of the HNP.

National Planning Policy Framework (LUC 4)

2.2. states that under National planning policy item 9 – Protecting greenbelt land – Smitham Bridge Road is green belt land so why have Hungerford Town Council (HTC) chosen this site?

2.2. states under National planning policy item 11 – conserving and enhancing the natural environment – Smitham Bridge Road is currently a natural environment with lots of wildlife and endangered species on this site such as door mice. So why have HTC chosen this site?

In the **Table at 2.1 Assessment of the HNDO objectives against NPPF goals that;**

Housing (LUC 5)

Objective A – includes the statement about where possible using previously developed land and minimising encroachment into the countryside. – The Land at Smitham Bridge Road allocated in Section 10 of the HNP is in the countryside so how is that conducive?

Getting About (LUC Page 5)

Objective F – states to minimise the effects of traffic on the town centre and especially the high street. Building on Land at Smitham Bridge Road will **increase** traffic generally as it is on the outskirts of the town and outside of the town boundary. It will also put more traffic into the town centre.

Climate Change and Biodiversity (LUC 6)

Objective S – states to ensure new development protects and enhances biodiversity – building on land at Smitham Bridge Road does **not** conserve and enhance the natural environment. **The SEA Environmental Report concluded in** Point 6.46 with reference to biodiversity and geodiversity, climate change and flood risk and community wellbeing, Land at Salisbury Road (Option 2) is the most favourable option. Not land at Smitham Bridge Road.

Table 4.1 of the Basic Conditions – Chapter 4 statement – LUC14 states;

In SP6: Flood Risk that site allocation policies Hung 12 incorporates site specific considerations for flood risk and requirements for SuDS but Suds have been removed from the current version of the HNP. This was in the Regulation Consultation 14 HNP but not the Regulation 16 Consultation HNP. Why?

In SP7 Design Quality – states that site allocation policy Hung12 incorporates site-specific design requirements and considerations but there is nothing in the Policy except in item e) that no rooftops are visible over the hedgerow. **(when coming into Hungerford from the West on North Standen Road).**

SP11 Biodiversity and Geodiversity – the document states that site allocation policies Hung 12 incorporates site-specific opportunities for the protection and enhancement of biodiversity **but there is nothing in Policy Hung12 relating to this.**

In the **Basic Conditions Document dated October 2024** it states under **Legal Compliance Check** that in item b Consultation statement – that the statement must contain details of the main issues and concerns raised and how they have been considered – but my views were not published in Appendix A of the Consultation Statement dated October 2024 so this is not legally compliant.

The Basic Conditions document also states under WBDC Comments on page 3 item c) that a summary of the main issues and concerns raised as a result of the pre-submission consultation are contained with Appendix A of the Consultation Statement but they are not because my views were not considered and are not included.

Item d – the pre-submission consultation representations it says can be found within Appendix A which also details the response to each representation received and how they have been considered in the submission version of the plan but mine were excluded.

I gave a lot of responses to the SEA Environmental Report but you will see there are only a few on Appendix A which are not mine.

PART C – Notification of progress of the Hungerford NDP

Do you wish to be notified of any of the following?

Please tick all that apply

Publication of the Examiners report / Decision to progress to referendum	yes
Decision to adopt the Hungerford NDP	yes

Signature		Date	19.05.25.
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Your completed representations must be received by the Council by 11:59pm on Friday 23 May 2025.











