

## Hungerford Town Council Objection to Planning Application 16/03061/OUTMAJ

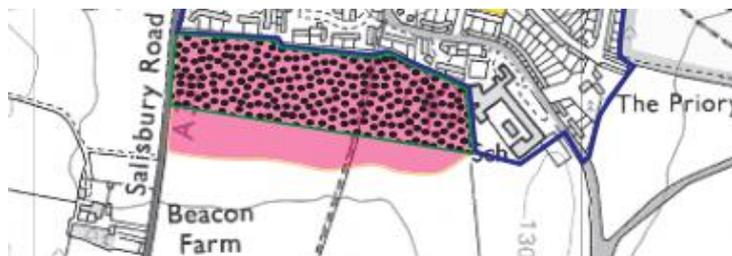
The Town Council wishes to object to the planning application for 119 houses south of Hungerford, off Salisbury Road for the reasons listed below.

1) The people of Hungerford feel very strongly that this development should not be approved. Our comments have been modified following a meeting with the public on 9<sup>th</sup> January 2017 at the Corn Exchange. It was a very well attended meeting with over 150 people and standing room only for many. This is a major attendance from the town reflecting the sense of feeling and is some 6% of all households. At the meeting a voting form was given to each person with an option to support or object to the planning application. Of the 155 submitted, there were 148 objecting, 6 supporting and 1 with no preference. This suggests a very strong view from the public with 95% objecting and 5% supporting. We very much hope that West Berkshire Council and the Planning Inspector will listen to these views.

2) The planning application is submitted before the draft DPD plan has been produced and the planning inspector raised concerns about the site during the Examination in Public (EIP). On 13<sup>th</sup> July 2016 as the Hungerford session was being concluded he stated that he was concerned that site HUN007 was not the best and that 'other options were more in accord with the NPPF'. Any application on the site must await this Draft document and should also be an adopted plan. The consequences of this site having planning permission would affect other planning applications being submitted and it could be a free for all in terms of development in the AONB;

2) The 119 houses are 19% more than the 100 dwellings stated in the draft DPD.

3) The area for development in the draft DPD indicated half of the field being developed, but the layout with the application shows some two thirds being taken up, about a 50% increase. See the drawing below:



Key:  
Dotted: is site HUN007 in Draft DPD  
Shaded: is the planning application

This is related to point 2, and reflects that the number of dwelling should be below 100. It is suggested that if the site were to proceed then 50 would be a more appropriate number, as the 100 dwellings target for Hungerford will easily be achieved with this number by 2026.

4) The development is in the highest impact location for the town in terms of traffic. Lower impact locations are available in more sustainable locations nearer to the town centre. The impact would depend on the trip generation rates, but a daily rate of 5-6 car trips per day would be typical for a development such as this which would result in 600-700 trips per day. Some 95% of these would be added to an already congested and environmentally damaged street which has many sensitive environmental receptors. In the peak hour there is congestion and this will be increase with about 70 extra vehicles per hour. Alternatives exist with a lesser impact and we have a duty to allocate housing which minimises the impact on the High Street;

5) Due to the increases in congestion in the High Street and Bridge Street, here will be two significant additional impacts:

- a) alternative unsuitable narrow roads will be used. Notably, there will be additional traffic routeing through the Common, Denford and Park Street. These are narrow rural lanes, there is live cattle on the Common which are being regularly hit and in some cases killed by speeding traffic. There is also the Denford / A4 junction which is a dangerous location with many accidents in recent years. The narrow rail bridge will also be at greater risk of being damaged and a safety risk to trains, as recently happened on the narrow bridge at Froxfield;
- b) economic damage done to the many shops that line the High Street and Bridge Street as visitors will be discouraged from walking adjacent to the higher volumes of traffic;

6) The development is the highest impact location for landscape, on an exposed and high location. Lower impact locations are available;

7) No exceptional circumstances have been demonstrated that it is the public interest to develop this major site in the AONB. National Planning Policy Framework (NPPF) para 116 is very clear that this does need to be demonstrated and this work has never been done. We list out para 116, as the Council find it incredible that West Berks and the applicant seem to have ignored this clear guidance:

*'116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest. Consideration of such applications should include an assessment of:*

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *the cost of, and the scope for developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *and detrimental effects on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.'*

The Planning Statement produced by the applicant covers paragraph 116 on page 15 in sections 3.37 to 3.41. Section 3.37 is quoting para 116 which leaves four short paragraphs to address the requirements. This is woefully inadequate and no exceptional circumstances have been demonstrated against the assessment bullet points above.

8) The site is 100% outside the settlement boundary and alternatives exist with some development in the settlement boundary which has much less impact on the landscape of the AONB. It has never been understood the justification by WBC to only consider sites outside the settlement boundary in the AONB. The reason given was because that is what they did in locations that were not AONB....which is not technical justification at all. The AONB has very special protection, unlike the rest of West Berkshire and as referred it has the same level of protection as a National Park and therefore deserves special treatment. We quote again from the NPPF, para 115:

*'Great weight should be given to conserving landscape and scenic beauty in National Parks, The Broads and Areas of Outstanding National Beauty, which have the highest status of protection in relation to landscape and scenic beauty.'*

Great weight to protecting this part of the AONB seems to be lacking. The Planning Statement also addresses para 115 on page 15 in sections 3.36 and 3.41. The Statement seems to gloss over it and somehow suggests the proposals are consistent with both paras 115 and 116, neither of which is the case.

9) The new roundabout with street lighting will have a significant visual impact on the landscape. It is along a ridge and will be viewed from many miles away in the AONB.

10) There are flooding concerns with many nearby residents reporting that there are is already flooding from the site to their properties. By building on the site this will speed up this run-off and cause a greater flood risk.

11) There are a number of services already at capacity in the town, notably the primary school and doctors' surgery. While 100 dwelling anywhere in Hungerford will impact on these services, 119 further increases the strain. In addition, the redevelopment sites within the town boundary should also be taken as part contributing to the 100 (e.g. Charnham St (7 units, Chestnut Walk (10 units), rail station (19 units).