

West Berkshire District Council

Representations to the Hungerford Neighbourhood Development Plan Submission (June 2025)

1. Background to the Hungerford Neighbourhood Development Plan (NDP)

- 1.1. For a neighbourhood plan to be put to referendum, they must meet a set of tests that are set out within paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The tests are known as the basic conditions, and those relevant to neighbourhood plans are as follows:
 - (a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
 - (d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
 - (e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
 - (f) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
 - (g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).
- 1.2. Hungerford Town Council, as the qualifying body, applied for the designation of the Hungerford Neighbourhood Area. This was formally designated by West Berkshire District Council (WBDC) on 9 April 2018. The Neighbourhood Area covers the Parish of Hungerford.
- 1.3. Following the designation of the Neighbourhood Area, Hungerford Town Council alongside its residents, worked together to create a Neighbourhood Development Plan (NDP).
- 1.4. Following several years of evidence gathering and preparing the plan, the pre-submission version of the Hungerford NDP was subject to a 6-week consultation between 16 February and 29 March 2024. Following this consultation, the feedback provided to the Neighbourhood Plan Group was reviewed and considered alongside feedback from statutory stakeholders. WBDC submitted representations to the consultation which aimed to provide advice as to where policies, sections or paragraphs within the NDP may be improved with a view to ensuring conformity with the Basic Conditions. For this consultation we have provided further advice on each of the policies and the plan in general. This is set out within Section 3 below.
- 1.5. Points (f) and (g) above relate to certain obligations which plans must adhere to, primarily in relation to habitats and environmental impacts. Some plans require a Strategic Environmental Assessment (SEA) and/or a Habitat Regulations Assessment (HRA).

- 1.6. WBDC were contacted by consultants (AECOM) appointed by Hungerford Town Council in October 2022 to determine whether a SEA might be required. Due to Hungerford's location within the North Wessex Downs National Landscape (Area of Outstanding Natural Beauty) and the presence of historic and nature conservation designations (for example Conservation Areas, Listed Buildings, Local Wildlife Sites, Special Areas of Conservation, and Sites of Special Scientific Interest) and because the NDP will include residential site allocations, it was WBDC's view that a SEA would be required.
- 1.7. A SEA Scoping Report was published in December 2023, and it was subject to consultation with the three statutory bodies (Environment Agency, Historic England and Natural England). A SEA Environmental Report was subsequently prepared which was subject to consultation between 16 February and 29 March 2024.
- 1.8. AECOM also prepared a Habitat Regulations Assessment (HRA) for Hungerford Town Council which includes Appropriate Assessment. The HRA was published as part of the pre-submission (Regulation 14) consultation on the NDP which took place between 16 February and 29 March 2024.

2. WBDC's acceptance of the Hungerford NDP

- 2.1. Hungerford Town Council submitted the NDP to West Berkshire District Council (WBDC) on 31 October 2024 and this was accompanied by the following documents:
 - Basic Conditions Statement
 - Consultation Statement
 - SEA Scoping Report
 - SEA Environmental Report
 - HRA
- 2.2. The following supporting evidence documents were also submitted:
 - Hungerford Housing Needs Assessment
 - West Berkshire Housing Needs Assessment Update
 - West Berkshire Density Pattern Book Approach
 - Hungerford Primary Shopping Areas Evidence Paper
 - Hungerford Local Green Spaces Justification Paper
 - Hungerford NDP Site Assessment Report
- 2.3. The above documents are considered to adequately fulfil the submission requirements under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 and Schedule 4b of the Town and Country Planning Act 1990, as inserted into Schedule 10 of the Localism Act 2011.
- 2.4. WBDC were therefore satisfied that the qualifying body of Hungerford Town Council had satisfied the relevant regulatory requirements to advance the Hungerford NDP to the publicity and consultation stage (Regulation 16) and subsequent submission of the NDP for independent examination.
- 2.5. In addition, WBDC is satisfied that the Hungerford NDP does not include any development which would be defined as 'excluded development' as prescribed by Schedule 9, Section 61k of the Localism Act.

- 2.6. At submission, WBDC undertook a Legal Compliance Check to determine if the submission requirements as set out in legislation have been met. The Legal Compliance Check, which is included within Appendix A.

3. WBDC's representations on the submission Hungerford NDP

- 3.1. At this 'draft plan' stage of the neighbourhood plan making process, the Local Planning Authority (LPA) is not required to consider whether the draft plan meets the basic conditions. It is only after the independent examination has taken place, and after the independent examiner's report has been received, that a LPA must come to a formal view on whether the draft neighbourhood plan meets the basic conditions.
- 3.2. The LPA should provide constructive comments on an emerging Plan before it is submitted.
- 3.3. Whilst the pre-submission (Regulation 14) consultation took place between 16 February and 29 March 2024, WBDC made representations on 4 August 2024. The delay was due to the independent examination on the West Berkshire Local Plan Review and staff resourcing. To inform the response, the Planning Policy Team requested the following service areas review the NDP:
- Archaeology
 - Development Management
 - Drainage and Flood Risk
 - Conservation & Design
 - Ecology
 - Environment Delivery
 - Highways
 - Housing
 - Public Protection (Environmental Health)
 - Rights of Way Team
 - Sport and Leisure Team
 - Sustainable Travel Team
 - Transport Policy
- 3.4. Table 3.1 below shows WBDC's representations made in August 2024, and a further response to the submission consultation. The above-mentioned services were also contacted for comments on the submission version of the NDP, and responses were received from the Archaeology, Environment Team, Public Rights of Way, Sport and Leisure Teams in addition to a joint response from the Sustainable Travel and Transport Policy Teams.

Table 3.1: WBDC's representations on the Hungerford NDP Regulation 16 submission consultation

Note: comments from the Planning Policy Team unless otherwise specified

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
General			
		Parts of the document refers to West Berkshire District Council and in other parts West Berkshire Council. It should be West Berkshire District Council.	Changes made, with the exception of the final sentence of paragraph 5.10 (p.24). Minor amendment for factual accuracy required to refer to West Berkshire District Council.
		As currently drafted, both the policy criteria and sub-criteria both have letter prefixes albeit distinguished by capitalised and uncapitalised letters. For clarity, it would help if the main policy criteria is prefixed by a number, with any sub-criteria prefixed by a letter.	With the exception of policies HUNG12 and HUNG13, changes not made. Policies with examples of this include the following: HUNG1, HUNG2, HUNG3, HUNG8, and HUNG10. As set out in our comments made at the Regulation 14 stage, we suggest that minor amendments are made to ensure clarity.
		Within the supporting text to the policies, it will be helpful to draw out any evidence and / or outcomes of community engagement that has been used to inform the policies.	No changes made. No further comments.
		The Plan extends beyond the town of Hungerford, and into the surrounding countryside. Do the Steering Group consider there should be any policies for outside of the town and within the countryside?	Some changes made, including eg. Objective H and H, policy HUNG2. No further comments.
		<ul style="list-style-type: none"> We note that several non-policy actions have been identified. So that it is clear to the reader, the lead agencies and partners should be identified for each Action. This could be included within each box, or you could include it within a table similar to how they are presented within the Cold Ash (https://www.westberks.gov.uk/coldashnp) and Hermitage (https://www.westberks.gov.uk/hermitagenp) neighbourhood plans. 	<p>No changes made.</p> <p>We suggest that minor amendments are made so that the 'Actions' are referred to as 'Non-Policy Actions'. This will help to clarify to the reader that they are separate to the planning policies.</p>

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		<ul style="list-style-type: none"> In addition, only include actions which are capable of being delivered within the Plan period. 	
			<p>The planning policies are included within chapters 4 through to 10. Before each policy, there is supporting text. To provide clarity, a minor amendment is needed to include the following sub-heading before each policy:</p> <p><i>Supporting text</i></p>
		<p><u>Archaeology Team:</u></p> <p>The overarching impression that, despite this being a plan for the whole parish, it is extremely focused just on Hungerford town. Even other settlements like Eddington and Hungerford Newtown have little mention, and the rural areas are barely considered at all aside from being lumped together as the 'landscape around Hungerford'. This starts right from Section 2 on Local Context and it's worth addressing this imbalance; the plan must be supported by local residents and businesses across Hungerford to be successful. This imbalance should be addressed.</p>	No further comments from the Archaeology Team.
		<p><u>Education Team:</u></p> <ul style="list-style-type: none"> From an education perspective we would welcome initiatives and housing to encourage families to settle in the town. There are fewer pre-school age children in the town than a decade ago, which is a pattern seen across the district and nationally. Hungerford has a lot to offer families - good transport links, a bustling high street and excellent sports facilities for children. Our research suggests that more families are found in new housing, when compared to all housing, and this is something for 	No comments received from the Education Team.

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		the community to consider. The document recognises a need to make specific provision for an ageing population, whilst also delivering a mix of other dwelling types/sizes. In order to attract families to the town suitably sized dwellings would need to be incorporated into any housing planned and the community may want to consider this, provided it aligns with planning policy requirements.	
		Policy references and their page numbers need to be added to assist in the navigation of the document.	Change made. No further comments.
Chapter 1: Introduction			
Para 1.1 (p.4)	Para 1.1 (p.4)	<u>Sustainable Travel Team & Transport Policy Team:</u> We note that the Introduction states that the document represents the Neighbourhood Plan up to 2041; however, the Town Council website references the lookahead period only being up to 2036.	Change made. No further comments from the Sustainable Travel Team & Transport Policy Team.
Para 1.4 (p.2)	Para 1.4 (p.2)	The 2 nd sentence states that West Berkshire Council will apply all relevant policies of the Plan. This should be changed to 'decision takers' to reflect instances where a planning decision may be subject to appeal (appeals are dealt with by the Planning Inspectorate). The 3 rd sentence comments that it is assumed the Plan will be read as a whole. The Plan <i>must</i> be read as a whole. The 2 nd and 3 rd sentences could be amended as follows: West Berkshire District Council Decision takers will apply all relevant policies of the Plan when determining planning applications, in addition to the other relevant policies of the development which the Plan forms part of. It is therefore	Change made. No further comments.

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		assumed that the Plan will be read as a whole, although some cross-referencing between Plan policies has been provided.	
Para 1.5 (p.2)	Para 1.5 (p.2)	We suggest including this within a new sub-section called 'how is the plan set out'. See comments below in relation to a new para after 1.9.	Change made. No further comments.
Para 1.6 (p.2)	Para 1.6 (pp.2-3)	<p>There are other documents which make up the development plan. Amend as follows and also include a link to the development plan page of WBDC's website (https://www.westberks.gov.uk/current-development-plan):</p> <p><i>The Neighbourhood Plan represents one part of the development plan for the neighbourhood area (Parish) over the period 2023 to 2041, the other parts relevant to Hungerford Parish being:</i></p> <ul style="list-style-type: none"> • the West Berkshire Core Strategy Development Plan Document 2006 to 2026 (adopted 2012) • the Housing Site Allocations Development Plan Document (adopted 2017) and • the Ssaved policies of the West Berkshire District Local Plan 1991 to 2006 (saved 2007) • West Berkshire Minerals and Waste Local Plan 2022-2037 (adopted December 2022) <p><u>The Core Strategy, Housing Site Allocations DPD and the 2007 saved policies collectively make up the District Local Plan. The current Local Plan plans for development up to 2026 and, in line with the NPPF, must be kept up-to-date and look ahead over a minimum 15-year period. The Local Plan is therefore undergoing a review to cover the period to 2039. Upon adoption, the West Berkshire Local Plan Review 2022-2041 will replace these three documents.</u></p>	<p>Since the submission of the NDP, the Inspector's Report on the West Berkshire Local Plan Review (LPR) has been received which recommends that the LPR with modifications is adopted.</p> <p>At a meeting of Council on 10 June 2025, Councillors resolved to adopt the LPR. The following modification will be required for factual accuracy to paragraphs 1.6 and 1.7 for factual accuracy:</p> <p>1.6 <i>The Neighbourhood Plan represents one part of the development plan [footnote 1] for the neighbourhood area (parish) over the period 2024 to 2041, the other parts relevant to Hungerford Parish being the West Berkshire Local Plan Review (adopted 2025) Core Strategy 2006 to 2026 (adopted 2012), the Housing Site Allocations Development Plan Document (adopted 2017), the saved policies of the West Berkshire District Local Plan 1991 to 2006 (saved 2007) and the West Berkshire Minerals and Waste Local Plan 2022 to 2037 (adopted 2022).</i></p> <p>1.7 The Core Strategy, Housing Site Allocations DPD and the 2007 saved policies collectively make up the District Local Plan. The current Local Plan plans for development up to 2026 and, in line with the NPPF,</p>

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			<i>must be kept up-to-date and look ahead over a minimum 15-year period. The Local Plan is therefore undergoing a review to cover the period to 2039. Upon adoption, the West Berkshire Local Plan Review 2022-2041 will replace these three documents.</i>
Para 1.7 (pp.2-3)	Para 1.8 (p.3)	<p>It will be helpful to explain that the Neighbourhood Area covers the parish of Hungerford, and that Hungerford Town Council as the Qualifying Body were responsible for leading on the Plan:</p> <p><i>West Berkshire District Council, as the local planning authority, designated the Hungerford Neighbourhood Area in April 2018 to enable. <u>The Neighbourhood Area covers the Parish of Hungerford.</u> Hungerford Town <u>Council is the Qualifying Body leading on the development of the</u> prepare the Hungerford Neighbourhood Plan <u>and it established the</u> The Plan has been prepared by the community through the Hungerford Neighbourhood Plan (HNP) Steering Group comprising of local councillors and members of the community to oversee the process.</i></p>	Change made. No further comments.
New para after 1.9	Paras 1.11-1.13 (p.3)	<p>It might be useful to explain how the Plan is set out to assist anyone unfamiliar with development plan documents:</p> <p><i>How is the Plan set out?</i></p> <p><i><u>Each chapter of the Plan covers a different topic. Under each heading there is a justification for the policies, which provides the necessary understanding of the policy, what it is seeking to achieve and, where relevant, how it should be applied. The policies themselves are provided in green boxes.</u></i></p>	Change made. No further comments.

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		<p><u>It is these policies, in combination with the other relevant policies in the development plan, against which planning applications in Hungerford Parish will be determined against. It is advisable that, to understand the full context of any individual policy, each policy is read in conjunction with its supporting text and the relevant evidence documents that have been compiled to underpin the Plan.</u></p> <p><u>The process of producing the Neighbourhood Plan has identified local needs and community aspirations that are not met through the planning system, but which are nevertheless important to the community. These needs and aspirations will be met through actions supported by a range of organisations. These actions are set out within blue boxes.</u></p>	
Para 1.10 (p.4)	Paras 1.14-1.15 (p.4)	Generally within NDPs and Local Plans the monitoring section is included at the very end of the document. See comments at the end of this table.	No changes made to location of section, however suggested text included. No further comments.
Para 1.10 (p.4)	Para 1.15 (p.4)	<p>Hungerford Town Council, as the responsible body <u>qualifying body</u>,.....</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We note the intent to periodically review the plan; we would hope that such reviews do not detract from the objective of consistently applying relevant, appropriate Policies and supporting strategies throughout the NDP period.</p>	<p>Change made. No further comments.</p> <p>No further comments from the Sustainable Travel Team & Transport Policy Team.</p>
Chapter 2: Local context			
Para 2.10 (pp.6-7)	Para 2.10 (pp.7-8)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>Noted the high percentage (54%) of couples with no children and single-person households combined, based on</p>	No further comments from the Sustainable Travel Team & Transport Policy Team.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		2021 Census data. This may reflect wider cost of living-related issues.	
Para 2.13 (p.8)	Para 2.13 (p.9)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>Lack of sixth form facilities underlines the importance of availability of public (or dedicated school) transport links to Newbury and ideally other towns in the vicinity (eg. Marlborough, Swindon, Salisbury), providing that these links remain affordable to farepayers, and sustainable.</p>	No further comments from the Sustainable Travel Team & Transport Policy Team.
Para 2.16 (p.8)	Para 2.16 (p.9)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>Noted the comment that “Cycle facilities are poor, but walking facilities and footpaths are extensive”. Current use of roadspace and constraints associated with the historic environment make it challenging to create or extend cycle routes (such as that on A338 Salisbury Road near Kennedy Meadow, south of the town) directly into the town centre and Station.</p> <p>A review of the hierarchy of use might be considered and/or measures to highlight the potential presence of cyclists and to reduce vehicle speeds, coupled with encouraging take-up of e-bikes to compensate for the gradients south of town. There is an indirect, lower-traffic route between the new estates south of Hungerford and the railway station via Lancaster Close, Lancaster Square, Bulpit Lane, Priory Avenue and Fairview Road, but it is tortuous and requires cyclists to dismount at the non-cycle-friendly barriers between Kennedy Meadow and Lancaster Close</p> <p>The comment does however acknowledge that many facilities in Hungerford can be reached easily by walking, with most facilities within a 1.5km walk radius.</p>	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>Noted the comment that “Cycle facilities are poor, but walking facilities and footpaths are extensive”. Current use of roadspace and constraints associated with the historic environment make it challenging to create or extend cycle routes (such as that on A338 Salisbury Road near Kennedy Meadow, south of the town) directly into the town centre and Station.</p> <p>A review of the hierarchy of use might be considered and/or measures to highlight the potential presence of cyclists and to reduce vehicle speeds, coupled with encouraging take-up of e-bikes to compensate for the gradients south of town. There is an indirect, lower-traffic route between the new estates south of Hungerford and the railway station via Lancaster Close, Lancaster Square, Bulpit Lane, Priory Avenue and Fairview Road, but it is tortuous and requires cyclists to dismount at the non-cycle-friendly barriers between Kennedy Meadow and Lancaster Close</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
			<p>(https://www.google.com/maps/@51.4073901,-1.520548,3a,16.1y,89.87h,84.88t/data=!3m7!1e1!3m5!1sEvNh6ZeC_EmuB_oY9W9c5w!2e0!6shttps:%2F%2Fstreetviewpixels-pa.googleapis.com%2Fv1%2Fthumbnail%3Fpanoid%3DEvNh6ZeC_EmuB_oY9W9c5w%26cb_client%3Dmaps_sv.tactile.gps%26w%3D203%26h%3D100%26yaw%3D252.40488%26pitch%3D0%26thumbfov%3D100!7i16384!8i8192?entry=tts).</p> <p>The comment does however acknowledge that many facilities in Hungerford can be reached easily by walking, with most facilities within a 1.5km walk radius.</p>
Para 2.17 (p.8)	Para 2.17 (pp.9-10)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>The Saturday variant of bus service 46 between Swindon and Hungerford was withdrawn in June 2023 following increases in operating cost re-tendering by Wiltshire Council.</p>	No further comments from the Sustainable Travel Team & Transport Policy Team.
Para 2.20 (p.9)	Para 2.20 (p.10)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>The Rights of Way Improvement Plan (RoWIP) represents an opportunity to further engage with landowners on management of footpaths and Bridleways.</p>	No further comments from the Sustainable Travel Team & Transport Policy Team.
Para 2.22 (p.)	Para 2.2 (p.10)	<p><u>Archaeology Team:</u></p> <p>The florist has closed.</p>	Change made. No further comments from the Archaeology Team.
Para 2.25 (p.10)	Para 2.26 (p.11)	<p><u>Archaeology Team:</u></p> <p>The tourist destinations listed are all outside of West Berkshire. A look at the North Wessex Downs National</p>	Changes made. No further comments from the Archaeology Team.

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		Landscapes map within the North Wessex Downs Visitor Guide (https://www.northwessexdowns.org.uk/visitor-information/) does show Welford Park and Combe Gibbet within easy reach of Hungerford.	
Para 2.25 (p.10)	Para 2.25 (p.11)		Minor amendment required to correct a typographical error: <i>At Hungerford Newtown there is Barrow Hill, a schedule ancient monument Scheduled Ancient Monument.</i>
	Para 2.26 (p.11)		<u>Archaeology Team:</u> Snowdrops is one word.
Para 2.30 (p.13)	Para 2.31 (p.14)	<u>Archaeology Team:</u> This could be re-worded to apply to the whole Parish.	Change made. No further comments from the Archaeology Team.
		<u>Sustainable Travel Team & Transport Policy Team:</u> Underlines the slight tension between two apparently conflicting issues: <i>“Inadequate car parking supply” and “The challenge of improving pedestrian and cycle infrastructure”.</i>	<u>Sustainable Travel Team & Transport Policy Team:</u> We welcome the opportunity moving forwards to engage further with the Parish and local stakeholders and to work together to address the identified “challenge of improving pedestrian and cycle infrastructure”, building on recent liaison and on the Reimagining the Kennet & Avon Canalside initiative (https://greenhamtrust.com/canal/) that we have helped bring together
		We assume that the main issues and challenges in Hungerford Parish have been identified with input from the community. You may therefore wish to mention this to reinforce that this is the community's plan.	Change made. No further comments.
Vision and Objectives			

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Para 3.1 (p.14)	Para 3.1 (p.15)	<p><u>Archaeology Team:</u></p> <p>Has the Vision for Hungerford come from documents specifically related to the Town? We would prefer to see the word 'historic' in place of 'man-made', or perhaps cultural would go better with heritage.</p>	<p><u>Archaeology Team:</u></p> <p>Though man-made has been taken out of this paragraph now, our strong preference is for the substitution of the words 'Built heritage' with 'historic environment', as this would tie in better with NPFF terms, ie. chapter 16 of the 2024 version. The built heritage is actually only part of the historic environment, as fields, meadows, earthworks etc., have been created by humans but are not exactly built. Suggest changing the final paragraph as follows:</p> <p><i>This should be achieved whilst conserving Hungerford's natural and built heritage historic environment and enhancing its strong sense of being a caring community and a fulfilling place to live.</i></p>
		<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>Noted within the overall Vision of Hungerford residents <i>"[working] together to embrace constructive change that ensures a vibrant, robust and sustainable economy that will enhance their prosperity and provide an affordable and nurturing environment for current and future generations."</i></p> <p>We trust that this statement of intent will translate into the Hungerford community and key stakeholders being open to embracing and engaging positively on proportionate proposals for improvements to facilities for active and sustainable travel.</p>	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>Noted within the overall Vision of Hungerford residents "[working] together to embrace constructive change that ensures a vibrant, robust and sustainable economy that will enhance their prosperity and provide an affordable and nurturing environment for current and future generations."</p> <p>We trust that this statement of intent will translate into the Hungerford community and key stakeholders being open to embracing and engaging positively on proportionate proposals for improvements to facilities for active and sustainable travel.</p>

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Objective C (p.15)	Objective C (p.16)	The Steering Group may wish to use the term 'respects' rather than 'reflects' when talking about the character, and this better marries up with the second half of the objective. More modern development may not reflect the local character, but it still can respect through massing and scale and some design features.	Change made. No further comments.
Para 3.2, 'Our Heritage' sub-section (p.16)	Para 3.2, 'Our Heritage' sub-section (p.17)	<p><u>Archaeology Team:</u></p> <p><i>"Aim: Conserve and, where practicable, enhance Hungerford's natural and built environment"</i> would be better changed to</p> <p><i>"Aim: Conserve and, where practicable, enhance Hungerford's natural and built historic environment"</i></p> <p>This would bring it in line with the National Planning Policy Framework (NPPF) chapter headings (built is of course part of historic).</p>	Change made. No further comments from the Archaeology Team.
		Aim is to 'conserve and where practicable enhance'. But objectives then say 'protect'. Should have consistent language.	Change made. No further comments.
	Para 3.2, Objective I (p.16)		<p><u>Sport and Leisure Team:</u></p> <p>Objective I supports a number of the Council's Leisure Strategy objectives.</p> <p>Although it more closely sits under the countryside service objectives, it does contribute to the leisure strategy.</p>
	Para 3.2, Objective J (p.16)		<p><u>Sport and Leisure Team:</u></p> <p>Objective J helps to support and inform the work of the Playing Pitch Strategy, commissioned and</p>

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			<p>undertaken by West Berkshire Council Leisure Team, due late summer 2025.</p> <p>The objective will also support the Built Facilities Strategy, once undertaken to ensure appropriate and sustainable facilities.</p>
Para 3.2, 'Our Heritage' sub-section, Objectives F, G and H (p.15)	Para 3.2, 'Our Heritage' sub-section, Objectives F, G and H (p.17)	<p><u>Public Protection Partnership:</u></p> <p>Welcome the objectives F, G and H regarding increase active travel and reducing the reliance of cars, however, more could be included regarding electric vehicle charging facilities in public car parks as well as for residential areas.</p>	No changes made. No comments received from the Public Protection Partnership.
Para 3.2 (p.14)	Para 3.2 (p.15)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>While we agree with the thrust of the Neighbourhood Plan Objectives, again these highlight the tension between:</p> <ul style="list-style-type: none"> the acknowledged desire to boost the numbers visiting the town; and Objectives F (minimising effects of traffic in town centre) and G (increase walking and cycling in the town). <p>Objective H (encourage public transport use) is also more difficult to attain, given existing low levels of use, high car ownership, the ongoing need for subsidies to underpin local bus operations in a mainly rural area and service reductions where those subsidies have had to be reduced eg. withdrawal of service 90 Lambourn-Hungerford, and withdrawal of Saturday variant of service 46 Swindon-Hungerford due to Wiltshire Council savings.</p> <p>We note Objective O, to "Improve the approaches to the town by road, rail and canal to create favourable first</p>	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>While we agree with the thrust of the Neighbourhood Plan Objectives, these highlight the tension between:</p> <p>the acknowledged desire to boost the numbers visiting the town; and Objectives F (minimising effects of traffic in town centre) and G (increase walking and cycling in the town).</p> <p>Objective H (encourage public transport use) is challenging to deliver against, given relatively low levels of bus use, high car ownership, the ongoing need for subsidies to underpin local bus operations in a mainly rural area and service reductions where those subsidies have in previous years had to be reduced e.g. withdrawal of Saturday variant of service 46 Swindon-Hungerford due to previous Wiltshire Council savings. Promoting train travel,</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>impressions and a soft boundary between the countryside and the town.” We would encourage further exploration with interested parties of feasibility to translate the canal towpath to a multi-user route that might potentially permit considerate cycling between other towns and Hungerford via a traffic-free route along the canal corridor. Newbury already benefits from National Cycle Network route 4 giving traffic-free access canal side into the town centre.</p> <p>We note Objective Q, to “Enhance the environment of Hungerford High Street and Bridge Street between the Bridge Street/A4 roundabout and the Atherton Road/High Street roundabout”. The environment bordering this stretch is generally quite attractive; however, it presently remains an A-class road and an important through route to Salisbury. As noted above there is a tension between the wider aim of encouraging visitors, who are highly likely to arrive by car, to boost the economy – coupled with desiring greater availability of car parking – and seeking to improve facilities for walking and cycling. Increased emphasis could be placed on promoting active travel for short-distance journeys</p> <p>We note Objective U, to “Increase resilience to climate change” which we hope may translate to an open-ness among the Hungerford community to walk, cycle or e-bike some or all of their short-distance local journeys instead of driving. This could in turn realise health and financial benefits for them, as well as releasing road space for those making longer-distance journeys to visit the town’s shops, market and amenities.</p>	<p>including through the Great West Way tourism initiative may help deliver Objective H.</p> <p>We note Objective O, to “Improve the approaches to the town by road, rail and canal to create favourable first impressions and a soft boundary between the countryside and the town.” We would encourage further working with ourselves and partners in the Reimagining the Kennet & Avon Canalside initiative (https://greenhamtrust.com/canal/) to explore translating the canal towpath to a multi-user route that might potentially permit considerate cycling between other towns and Hungerford via a traffic-free route along the canal corridor. Newbury already benefits from National Cycle Network route 4 giving traffic-free access canalside into the town centre.</p> <p>We note Objective Q, to “Enhance the environment of Hungerford High Street and Bridge Street between the Bridge Street/A4 roundabout and the Atherton Road/High Street roundabout”. The environment bordering this stretch is generally quite attractive; however it presently remains an A-class road and an important through route to Salisbury. As noted above there is a tension between the wider aim of encouraging visitors, who are highly likely to arrive by car, to boost the economy – coupled with desiring greater availability of car parking – and seeking to improve facilities for walking and cycling. Increased emphasis could be placed on promoting active travel for short-distance journeys.</p>

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			We note Objective U, to “Increase resilience to climate change” which we hope may translate to an open-ness among the Hungerford community to walk, cycle or e-bike some or all of their short-distance local journeys instead of driving. This could in turn realise health and financial benefits for them, as well as releasing road space for those making longer-distance journeys to visit the town’s shops, market and amenities.
	Objective G (p.16)		<u>Sports and Leisure Team:</u> Objective G supports leisure strategy objective 4.5 in supporting and promoting the use of green travel. Improving walking and cycling routes to allow people to access areas without the need for a car, would help support this objective in the leisure strategy.
Para 3.2, ‘Our Heritage’ sub-section, Objective N (p.16)	Para 3.2, ‘Our Heritage’ sub-section, Objective N (p.17)	<u>Archaeology Team:</u> Welcome a focus on protecting and enhancing the historic environment, but the ‘appearance’ seems quite hard to quantify or judge. Would ‘character’ be better, as we have some data on this in our characterisation projects? More information available at: https://www.westberks.gov.uk/historicenvironmentprojects .	Change made. No further comments from the Archaeology Team.
Para 3.2, ‘Our Heritage’ sub-section, Objective P (p.16)	Para 3.2, ‘Our Heritage’ sub-section, Objective P (p.17)	<u>Archaeology Team:</u> Does this mean protect the rural areas from development? Or from flooding, or pollution or other things like climate change? Or solar farms and wind turbines? It seems a bit unspecific. And perhaps listing the charities and agencies ‘responsible’ for its conservation would help elaborate what is meant. Is West Berkshire Council included in this list? Presumably, the North Wessex Downs National Landscape	<u>Archaeology Team:</u> This still seems to me to be too woolly an objective – what does ‘protect’ mean exactly? Stop any building on it? Stop farmers doing things which aren't beneficial to biodiversity? Allow solar and wind schemes?

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		is one of the agencies meant but what about the farmers and landowners who are primarily responsible for the management and land-use of this landscape?	
Para 3.2, climate change and biodiversity aim (p.16)	Para 3.2, climate change and biodiversity aim (p.17)	<p><u>Public Protection Partnership:</u></p> <p>The aim states cleaner air however none of the objectives are specific to reducing nitrogen dioxide or particulate matter (PM10 and PM2.5).</p>	No change made. No further comments from the Public Protection Partnership.
Para 3.2, 'Our Heritage' sub-section, Objective S (p.16)	Para 3.2, 'Our Heritage' sub-section, Objective S (p.17)	<p><u>Archaeology Team:</u></p> <p>Possibly this sentence needs rephrasing, it could read as if development should be encouraged because this will maximise biodiversity.</p>	Change made. No further comments from the Archaeology Team.
Chapter 4: Housing			
	Para 4.5 (pp.19-20)		<p>At a meeting of Council on 10 June 2025, Council will consider the adoption of the LPR. If the LPR is adopted, a minor modification is required for factual accuracy to refer to policy SP18 of the LPR rather than policy CS4 of the Core Strategy:</p> <p><i>4.5 Policy CS4 in the West Berkshire Core Strategy requires development to provide an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community. This should have regard to the evidence of housing need and demand from Housing Market Assessments and other relevant sources. Similarly, Policy SP18 <u>SP15</u> in the emerging West Berkshire Local Plan Review requires development proposals to contribute to the delivery of an appropriate mix of dwelling tenures, types and sizes. The supporting text to policy SP18 sets a specific 'base mix' <u>which is taken from it's the</u></i></p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
			<i>West Berkshire Local Housing Needs Assessment Update 2022...</i>
	Para 4.6 (p.20)		At a meeting of Council on 10 June 2025, the LPR was adopted. A minor modification is required for factual accuracy to remove reference to the emerging LPR: <i>4.6 Emerging Local Plan Review Policy SP18 requires an mix of dwelling sizes reflecting its requirements on all developments of 10 dwellings or more...</i>
Policy HUNG1: Housing Mix (p.19)	Policy HUNG1: Housing Mix (p.20)	<p><u>Development Management Team:</u></p> <p>Part B – it is unclear what factors are to be considered to assess whether different types of 2-bed properties do or do not meet the needs of first-time buyers or older people downsizing.</p> <ul style="list-style-type: none"> Policy HUNG1 seeks to ensure housing development provides a range of house types sizes and tenures that meet the needs of all age groups and incomes. We consider that the policy needs to be made clearer and make greater reference to evidence. <p><u>Criterion A:</u></p> <ul style="list-style-type: none"> It is not in general conformity with policy SP18 of the Local Plan Review. Policy HUNG1 requires development proposals of 5 or more dwellings to provide a mix of dwellings in line with the West Berkshire Updated Housing Needs Evidence and does not provide any flexibility which may be appropriate in some cases. SP18 requires development proposals of 10 or more dwellings to provide a mix in line with the Updated Housing Needs Evidence yet sets out criteria 	<p>Changes made to policy to remove reference to 2-bed properties. No comments received from the Development Management Team.</p> <p>The supporting text to the policy now sets out the recommended housing mix as recommended in the Hungerford Housing Needs Assessment.</p> <p><u>Criterion A:</u></p> <p>To ensure that the policy is in general conformity with policy SP15 of the LPR, we recommend that Part B of the policy is updated to provide greater flexibility of when the recommended mix may not be appropriate:</p> <p><i>B. In determining Aany departure from this the recommended mix shall only be permitted in the following circumstances,regard will be given to:</i></p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>that should be considered when determining any variation away from this mix. There is no evidence to justify why the threshold should be 5 or more dwellings, and the supporting text at paragraph 4.6 refers to 10 or more dwellings.</p> <ul style="list-style-type: none"> We question why the policy requires a mix in line with that suggested in the West Berkshire Updated Housing Needs Evidence, when para 4.1 states that Hungerford has a different housing mix and need to the rest of West Berkshire. As part of the preparation of the Plan, a Housing Needs Assessment (HNA) was prepared for the Neighbourhood Area, and this identifies a housing mix that is needed over the Plan period. Neighbourhood plans provide the chance to provide a local level of detail, and we wonder why the requirements of the HNA have been disregarded in favour of cross-reference to the West Berkshire Updated Housing Needs Evidence, which is a district-level assessment prepared as evidence for the West Berkshire Local Plan Review. Criterion A refers to the 'West Berkshire Strategic Housing Needs Assessment 2022'. The correct name of the document is the 'West Berkshire Updated Housing Needs Assessment Update'. <p><u>Criterion B:</u></p> <ul style="list-style-type: none"> This criterion is confusing. It is unclear why there is a focus on 2-bed properties. The Hungerford Housing Needs Assessment (HNA) does not identify any real need for 2-bed properties, and instead recommends in Table 6-21 the following mix: <ul style="list-style-type: none"> 1-bed: 2.8% 	<p><i>a. Any physical or site factors that limit the mix.</i> <i><u>b. The location.</u></i> <i>b.c. If there is clear evidence for the need for a particular type of housing, e.g., specialist older persons' housing such as bungalows.</i> <i><u>d. Site specific viability.</u></i></p> <p><u>Criterion B:</u> The removal of the focus on 2-bed properties and the focus on parish level evidence is supported.</p>

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		<ul style="list-style-type: none"> ○ 2-bed: 0% ○ 3-bed: 39.2% ○ 4-bed: 40.3% ○ 5-bed: 17.7% <ul style="list-style-type: none"> • The supporting text at para 4.1 states that Hungerford has a mix and need that is different to the rest of West Berkshire (and this is evidenced within the Hungerford HNA). However, table 4.1 and para 4.6 then take the midpoint from the identified mix set out in policy SP18 and asserts that there is a need for schemes of 10 or more dwellings to include 2-beds. This conflicts with the findings in the Hungerford HNA. • As with criterion A, the policy states that 5 or more dwellings, yet the supporting text refers to 10 dwellings. • Criterion B requires 2-bed properties to provide a mix of dwelling types that that reflect the need of first-time entrants to the housing market and older downsizers. The Hungerford HNA identifies that the housing types most likely to meet the needs of the Hungerford demographic profile are detached and semi-detached houses, with a rising number of flats and maisonettes as the population ages. It goes on to recommend that bungalows should be promoted to meet the demands of a growing elderly population. • It is not clear what factors are to be considered to assess whether different types of 2-bed properties do or do not meet the needs of first-time buyers or older people downsizing. • We question whether criterion B is needed at all. The policy could set out a recommended mix for Hungerford based on the HNA. To ensure that the policy is not too rigid, it could identify when there might be exceptions. It 	

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>could also support particular types of dwellings which have been identified within the Hungerford HNA.</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>In conjunction with the emphasis on:</p> <ul style="list-style-type: none"> providing a mix of dwelling types and allowing for smaller households whose income may already be stretched; and the Vision to embrace constructive change. <p>We would welcome the Hungerford NDP being a further spur to developers providing sufficient cycle parking for residents and visitors within new development, at the very least for those developments of 5 dwellings and above, as a proportionate measure to encourage local cycling. This tallies with WBC's updated Highways Design Guidance and the Government's LTN 1/20 Cycle Infrastructure Design guidance.</p>	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>In conjunction with the emphasis on:</p> <ul style="list-style-type: none"> providing a mix of dwelling types and allowing for smaller households whose income may already be stretched; and the Vision to embrace constructive change <p>We would welcome the Hungerford Neighbourhood Plan being a further spur to developers providing sufficient cycle parking for residents and visitors within new development, at the very least for those developments of 5 dwellings and above, as a proportionate measure to encourage local cycling.</p>
Chapter 5: Design and Character			
Objective C, paras 5.1 and 5.2 (p.20)	Objective C, paras 5.1 and 5.2 (p.22)	<ul style="list-style-type: none"> Consider using the term 'respects' rather than 'reflects' in Objective C, and throughout the text (already in A of HUNG2). Para 5.2 highlights that there is not a homogenous style of design so this would be better language. Is the Objective only to ensure housing development reflects the local character? As 5.2 talks about the town centre, which is a mixture of uses and building styles, and thus the objective could be broadened to cover non-residential uses, which would then tie in with Policy HUNG2 which talks about design and character more generally. Or should HUNG2 be titled to make it clearer 	Changes made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		that it is just for residential developments? Would the NDP wish to have a general design policy or specific to residential?	
Para 5.1, final paragraph (p.20)	Para 5.1, final paragraph (p.22)	The text could also reference policy SP1 of the Local Plan Review (LPR) and the West Berkshire Density Pattern Book Study (https://www.westberks.gov.uk/media/48472/West-Berkshire-Density-Pattern-Book-September-2019/pdf/West_Berkshire_Density_Pattern_Book_September_2019.pdf?m=1707725638817) , as both discuss densities.	Changes made. The paragraph refers to the emerging Local Plan. The LPR was adopted on 10 June 2025. A minor modification is required for factual accuracy to remove reference to 'emerging', ie.: <i>5.1 The design of new development in Hungerford parish is important. It needs to respect the locally distinctive character. Policy SP7 (Design Quality) of the West Berkshire emerging Local Plan Review requires development to take opportunities...</i>
Para 5.1 (p.20)	Para 5.1 (p.22)	<u>Archaeology Team:</u> Are there existing documents about the Hungerford parish's locally distinctive housing character? If not, perhaps this could be defined a bit? Eg. predominantly red brick and tile or slate roofing, generally two storeys in height.	No changes made. No further comments from the Archaeology Team.
		<u>Conservation Team:</u> As the Archaeology Team have mentioned, it would be helpful to have some definition of the locally distinctive character in terms of design – scale/height, materials, roof forms, boundary treatments, plots patterns, density, street frontages.	No changes made. No comments received from the Conservation Team.
Para 5.2 (p.20)	Para 5.2 (p.22)	<u>Archaeology Team:</u> Hungerford does have a large Conservation Area, but there is also a separate one in Eddington.	Change made. No further comments from the Archaeology Team.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p><u>Conservation Team:</u></p> <p>Desire to maintain eclectic mix of style – it may be helpful to outline if any unifying features within this mix positively contribute to the character and appearance of the area (for example, the use of high quality local/traditional materials or a consistent building line/street frontage).</p>	Paragraph amended to remove reference to the mix of styles. It now focuses solely on the two Conservation Areas. No comments received from the Conservation Team.
	Para 5.4 (p.22)		<p>NDPs provide the opportunity to provide a local level of detail that is not included with a local plan.</p> <p>The paragraph refers to the emerging Local Plan. The LPR was adopted at a meeting of Council on 10 June 2025. A minor modification is required for factual accuracy to remove reference to 'emerging', ie.:</p> <p><i>5.4 Whilst the Neighbourhood Plan is not supported by a specific set of detailed design codes, the principles of the West Berkshire emerging Local Plan <u>Review</u> Policy SP7</i></p>
	Para 5.5 (p.22)		<p>The paragraph refers to the emerging Local Plan. The LPR was adopted on 10 June 2025. A minor modification is required for factual accuracy to remove reference to 'emerging', ie.:</p> <p><i>5.5 In addition, emerging Local Plan <u>Review</u> Policy SP1 expects...</i></p>
	Landscape and Town Approaches (pp.23-25)		<p><u>Rights of Way Team:</u></p> <p>The canal Towpath has been identified as an important route and gateway to Hungerford. It might be nice to see ambition to ensure that the aim is to have this well surfaced and accessible</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
			for all. This will ensure that there are improved recreational facilities for all, including the less able and wheelchair users. It will also send a positive message to visitors and improve tourism prospects, and be a bold declaration of Hungerford as a place of importance and as a meaningful destination.
	Para 5.6, p.23		<u>Archaeology Team:</u> It appears this sentence has been taken from some words we wrote, but please note that it should say pockets of designed landscape, NOT designated (as the parklands in question do not yet have any national status)
Policy HUNG2 (p.20)	Policy HUNG2 (pp.22-23)	<p><u>Archaeology Team:</u></p> <p>No mention is made of Hungerford's burgage plots, ie. the narrow property boundaries within the historic town centre of Hungerford. These are a particular feature of a planned town and are relatively well-preserved in Hungerford. Under an old local plan, they had their own policy, but this was not retained. Our Historic Environment Character Zone for Hungerford's Historic Core (https://www.westberks.gov.uk/media/19396/HECZ-HHC/pdf/HECZ) noted that protecting the definition and character of the burgage plots remains a high priority.</p> <p><u>Development Management Team:</u></p> <ul style="list-style-type: none"> The supporting text refers only to residential development but the policy itself refers to development in general (apart from parking) No expansion in B a-d on materials and features. 	<p>No further comments from the Archaeology Team.</p> <p>No comments received from the Development Management Team.</p> <p>The Development Management Teams comments are noted in respect of criterion B(a) and that it is not strictly relevant to design and character. However, the 10 characteristics identified for well-designed</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<ul style="list-style-type: none"> Part A – is Hungerford referring to the town settlement or to the whole neighbourhood area? Part B, a. – is this the most appropriate policy to include road patterns being permeable for cyclists and pedestrians? Part B, b. – suggest including reference to what the range of densities should be within. Part B, c. – appears not to allow for buildings lower than the prevailing height of surroundings buildings – eg bungalows. Part B, d. – is this the most appropriate policy to include parking for residential development? 	<p>places in the National Design Guide include movement and connectivity for all modes of transport.</p> <p>Criterion B(b) refers to 'West Berkshire emerging Local Plan Policy SP1.' The LPR was adopted on 10 June 2025. For factual accuracy, a minor modification is required to make reference to 'Local Plan Review Policy SP1'.</p> <p>Criterion B(d) should be deleted as there is no need for neighbourhood plan policies to repeat policies in the LPR. The neighbourhood plan when adopted will form part of the development plan. The development plan must be read as a whole.</p>
		<p><u>Conservation Team:</u></p> <ul style="list-style-type: none"> Criterion B. b. – <i>a range of plot layouts</i> – Generally, historic cores tend to have a finer urban grain. To facilitate variation in façade treatments (and encourage an eclectic mix of style as in paragraph 5.2), new development should be encouraged to follow this finer historic urban grain (the burgage plots that the Archaeology Team highlighted) Other considerations: <ul style="list-style-type: none"> Protection of locally important viewpoints and local landmarks (such as views towards the Town Hall) 	<p>No changes made. Criteria A of the policy mentions that the design and layout should respect the local character of the Parish.</p>
		<ul style="list-style-type: none"> Part a of the policy refers to the 'local character of Hungerford', however there is no explanation within the supporting text as to what this is. The Cold Ash NDP (https://www.westberks.gov.uk/coldashnp) includes a policy on local character, and the supporting text 	<p>NDPs provide the opportunity to add further detail to that contained within a local plan policy. However, it is noted the Qualifying Body have chosen to include a generic design policy.</p>


Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>provides information on the different local characters within the Neighbourhood Area.</p> <ul style="list-style-type: none"> • Part b of the policy appears to conflict with policy HUNG1, for example a developer could argue they are still providing a range of densities and house types even if they do not comply with policy HUNG1. • Part c of the policy – further to the comments from the Development Management Team, the reference to ‘a taller building’ could be removed and replaced with ‘the design’ or ‘the height’ or similar. • Could a design code that covers the Neighbourhood Area be prepared? This could break up the different character areas, both within the town and outside within the remaining Neighbourhood Area. • There is guidance on preparing design codes on the Council's website: https://www.westberks.gov.uk/npresources. One of Locality's free technical support packages covers design codes which the Town Council may be eligible for: https://neighbourhoodplanning.org/apply/. <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We fully support the desire within Policy HUNG2, clause B, sub-clause a) that there should be permeability for cyclists and pedestrians. Emphasis should be placed on considerate cycling, coupled with regular local liaison with and active engagement from, the police to ensure effective enforcement to tackle any isolated incidents of anti-social behaviour. Buildings should be energy efficient and make use of renewable energy where possible.</p>	<p></p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We fully support the desire within Policy HUNG2, clause B, sub-clause a) that there should be permeability for cyclists and pedestrians. Emphasis should be placed on considerate cycling, coupled with regular local liaison with and active engagement from, the police to ensure effective enforcement to tackle any isolated incidents of anti-social behaviour. Buildings should be energy efficient and make use of renewable energy where possible.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
Objectives (p.21)	Objectives (p.23)	<ul style="list-style-type: none"> Objective O mentions the approaches to the town by road, rail and canal, yet there is no further mention of the approaches by rail in the supporting text below. Objective P Suggest 'conserve and enhance' would be more appropriate terminology than 'protect' 	<p>No changes made to include reference to rail, however a new paragraph has been included (para 5.12).</p> <p>No changes made to include reference to conserve and enhance. The purpose of the National Landscape designation is to conserve and enhance, and we suggest an amendment is made to reflect this.</p>
Para 5.3 (p.21)	Para 5.6 (p.23)	<p><u>Archaeology Team:</u></p> <p>Hungerford parish is entirely within the North Wessex National Landscape. Perhaps this section on landscape could elaborate more on the wider area, and include a bit more about the arable fields, meadows, different types of woods, Hungerford Common (a very important survival) and the pockets of designed landscape, eg Chilton Park, Hungerford Park and smaller areas round Standen Manor and Eddington. There are also several historic farmsteads.</p> <p>Suggest rewording as follows:</p> <p><i>Hungerford is entirely within the North Wessex <u>Downs</u> National Landscape, <u>which is designated as an AONB</u>.</i></p>	<p>No further comments from the Archaeology Team.</p> <p>No changes made. The North Wessex Downs is a nationally important landscape, designated as an Area of Outstanding Natural Beauty (AONB) and protected by the Countryside and Rights of Way Act 2000 (CROW Act) to conserve and enhance its natural beauty.</p> <p>On 22 November 2023 AONBs across England and Wales became known as National Landscapes, but the formal designation, and the legal protections, remain the same.</p> <p>The rewording as previously recommended at the Regulation 14 stage needs to be made for factual accuracy.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
Para 5.4 (p.21)	Para 5.8 (p.23)	It is important to note that the gateways are both entry and exit points into and out of Hungerford.	<p>No changes made. It is suggested that for clarity an amendment is made to the paragraph to also reference exit points:</p> <p><i>Of relevance to this are the entry and exit points into Hungerford along main and smaller routes. These include Bath Road (A4), Charnham Street, the B4192, North Standen Road, Park Street, Salisbury Road and Priory Road. These provide a range of views of the entry and exit to the town as you move from countryside to urban area and vice versa. Most provide a soft, rural feel that only becomes more visually urbanised comparatively close to the main built-up area of the town. It is important that any development retains this soft feel.</i></p>
Para 5.5 (p.21)	Para 5.9 (p.24)	Suggest 'conserving and enhancing' would be more appropriate terminology than 'protecting'.	<p>No changes made. For clarity the following amendment should be made to the first sentence of the paragraph:</p> <p><i>The overall setting of the town, with an abundance of trees and shrubs, is important for preserving conserving and enhancing its identity....</i></p>
Para 5.6 (p.21)	Para 5.10 (p.24)	<p>Suggest rewording as follows:</p> <p><i>Equally significant gateways to Hungerford are the routes in along the Kennet and & Avon Canal. Whilst not subject to the same levels or types of traffic as the road routes, it is important that the view impression of Hungerford by those entering travelling along the Canal is a positive one. These users tend to be tourists who, if they feel compelled to stop in Hungerford, will increase spending in the local area. A good first impression is important to this.</i></p>	Changes made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
New para (p.22)	Para 5.12 (p.24)	Suggest an additional paragraph on rail is included	New paragraph added (para 5.12). No further comments.
Policy HUNG3 (p.22)	Policy HUNG3 (p.24)	<p>For clarity when dealing with planning applications we suggest rewording as follows:</p> <p><u>IMPORTANT GATEWAYS INTO AND OUT OF HUNGERFORD TOWN</u></p> <p>— A. Development proposals adjacent to the gateways into Hungerford town should demonstrate how they contribute to creating a gradual transition from rural countryside to urban settlement (and vice versa). Development proposals should avoid creating an overly dense feel and appropriate planting or other natural boundary treatments should be used to mitigate the impact of development and retain the open feel. This should include the use of trees to line the gateway routes.</p> <p>A. Development proposals should conserve and enhance the rural setting of the important gateways into Hungerford. Proposals should include appropriate landscaping which minimises the impact of any development upon the open character of the surrounding countryside.</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We note the aspiration to make more of the gateways on the approaches into Hungerford. If designed and managed appropriately – and, crucially, underpinned by sufficient ongoing revenue budget to allow maintenance, such as cutting back of overhanging tree branches - gateway features can help reduce vehicle speeds, making the street environment safer for local walking and cycling journeys, and for turning movements in the context of the A4/B4192 junction.</p>	<p>Change made to refer to important gateways, however other suggested changes not included. Previous comments made at the Regulation 14 stage remain.</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We note the aspiration to make more of the gateways on the approaches in to Hungerford. If designed and managed appropriately – and, crucially, underpinned by sufficient ongoing revenue budget to allow maintenance, such as cutting back of overhanging tree branches - gateway features can help reduce vehicle speeds, making the street environment safer for local walking and cycling</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>We note identification of the Kennet and Avon Canal as a green gateway to Hungerford. In the near future, we would encourage positive discussions with interested parties including Sustrans and Canal and River Trust, on the feasibility of converting the canal towpath to a multi-user route, to potentially allow considerate cycling as well as walking between other towns and Hungerford along the traffic-free canal corridor. Resources would need to be allocated, if a feasibility study was to be undertaken.</p> <p><u>Development Management Team:</u></p> <p>A – slightly confusing policy reference to open feel and the need for additional planting and tree lined routes -which would contribute to enclosing areas.</p>	<p>journeys, and for turning movements in the context of the A4/B4192 junction.</p> <p>We note identification of the Kennet and Avon Canal as a green gateway to Hungerford. In the near future, we would encourage positive discussions with interested via the existing Reimagining the Kennet & Avon Canalside initiative (https://greenhamtrust.com/canal/) , on the feasibility of converting the canal towpath to a multi-user route, to potentially allow considerate cycling as well as walking between other towns and Hungerford along the traffic-free canal corridor. Resources would need to be provided by local partners, if a feasibility study was to be commissioned.</p> <p>Policy re-worded to use the phrase ‘where appropriate’ rather than ‘should’. No further comments.</p>
	Action B, p.25		<p><u>Archaeology Team:</u></p> <p>It is unclear who the charities and agencies responsible for ‘the conservation of the landscape around Hungerford’ are. The landowners are pretty key.</p>
Figure 5.1: Gateways into Hungerford town (p.23)	Figure 5.1: Gateways into Hungerford town (p.25)	<ul style="list-style-type: none"> • Suggest the figure is entitled ‘Important gateways into Hungerford’ • Has any thought been given to the area below and whether or not it could also be considered a gateway? 	Suggested additional gateway not included, however the figure title has been renamed as suggested. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
			
Para 5.8 (p.24)	Para 5.14 (p.26)	<p><u>Archaeology Team:</u></p> <p>No mention of the separate Eddington Conservation Area</p>	Change made. No further comments from the Archaeology Team.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p><u>Conservation Team:</u></p> <ul style="list-style-type: none"> As the Archaeology Team have pointed out, the Eddington Conservation Area needs to be included. It may be helpful for a brief assessment of the significance of these conservation areas to be included (historic settlement, relationship with waterways and open spaces, development patterns, identification of a vernacular character). 	Reference to Eddington Conservation Area included, however no further changes made. No comments received from the Conservation Team.
Para 5.9 (p.24)	Para 5.15 (p.26)	<p><u>Archaeology Team:</u></p> <p>It might be worth including an appendix/ annex of a table of the parish's nationally designated heritage assets. We have indicated these in the attached table but can provide something in whatever format is required. There are a lot of Listed Buildings in the parish (not just in the town), it's either 138 or 139, we cannot quite reconcile two different sources, but this needs checking!</p> <p>As well as the single Scheduled Monument, the parish also has a small part of a Registered Park in the form of the avenue leading to Littlecote House. We don't think we agree with the sentence that listed buildings and monuments are already well protected through Local Plan Policy. Scheduled Monuments in the countryside may have some protection under legislation but many are under the plough or otherwise being damaged, and this falls outside the Local Plan. Some listed buildings are falling into a poor state of repair, and we do not think the Local Plan per se addresses this.</p>	New Appendix A included. No further comments from the Archaeology Team.
		<p><u>Conservation Team:</u></p>	Change made, no further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		As noted by the Archaeology Team, it would be helpful to include a list of nationally designated heritage assets.	
Para 5.10 (p.24)	Para 5.16 (p.26)	<u>Archaeology Team:</u> This and the policy HUNG4 is a matter for Conservation advice (see comments below).	No further comments from the Archaeology Team.
		<u>Conservation Team:</u> Energy efficiency in historic buildings: <ul style="list-style-type: none"> • Energy efficiency in historic buildings should take a whole-building approach (including improving insulation and draught-proofing to improve thermal performance) • Historic windows contribute to the special historic and architectural interest of listed buildings and conservation areas <ul style="list-style-type: none"> ○ Listed Buildings – original/historic windows in listed buildings should be retained and repaired, where possible. Secondary glazing is encouraged to improve thermal performance. Replacement windows would only be considered appropriate if the existing are beyond repair and should closely match the original (in some cases, slim line double glazed timber windows may be appropriate). 	Changes made to the policy to reflect comments made at the Regulation 14 stage.
Policy HUNG4 (p.24)	Policy HUNG4 (p.26)	<u>Conservation Team:</u> <ul style="list-style-type: none"> • Criterion A: should encourage a whole-building approach. • Criterion B: it would be helpful to differentiate between listed buildings and those not listed but within conservation areas: 	Changes made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<ul style="list-style-type: none"> ○ Listed buildings - secondary glazing and, in specific cases, slim line double glazing ○ Conservation areas – timber windows (can be double or triple glazed, provided that they can appropriately match the appearance of the existing). 	
		<p><u>Development Management Team:</u></p> <ul style="list-style-type: none"> • Suggest liaising with the Council’s Conservation Team as the policy appears to inadvertently enable double glazing. • C – Is the policy expecting bespoke colours for solar panels beyond the standard black monocrystalline or blue polycrystalline cells? Are there cost/efficiency implications for bespoke colours? 	Changes made. No further comments.
			<p><u>Environment Delivery Team:</u></p> <p>Amend criterion d to refer to timber framed windows from sustainable sources:</p> <p><i>B. Where this is to be achieved through measures to reduce heat loss, this could include secondary, double or triple glazing in conservation areas and secondary and slimline double glazing in listed buildings. Such measures should seek to use timber framed windows from sustainable sources...</i></p>
Para 5.11 (p.25)	Para 5.17 (p.26)	<p><u>Archaeology Team:</u></p> <p>It would be fantastic if a group involved in the Hungerford NDP could collate information on buildings that they think have local heritage merit – there are lots that are unlisted including many outside the two Conservation Areas. We are happy to make some suggestions, as we add anything we</p>	No changes made. No further comments from the Archaeology Team.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>think has some heritage interest to the HER, but actually there is also a brilliant resource in the Hungerford Virtual Museum, and an active Historical Association.</p> <p>The 'Non-Designated Heritage Assets' don't all have to be buildings of course – our Local List of Heritage Assets (https://www.westberks.gov.uk/article/41022/Local-List-of-Heritage-Assets) can include monuments, structures, parks and gardens, and places. There are already two entries on the Local List in Hungerford Parish (not mentioned), and these are the Second World War pair of anti-tank gun emplacements by the railway and canal, and a separate pillbox at Denford Gate. Again, we would recommend getting the candidate heritage assets named in an annex in the NDP as even if they don't all meet the criteria for the Local List, they can be shown to be valued by the community.</p> <p>Another angle in protecting the heritage is identifying archaeological sites which would benefit from positive management. We do this in the course of consultations for agri-environment schemes and we have indicated sites we know about, but there may be other earthworks, cropmarks or structures that the local community would like to tell us about.</p>	
		<p><u>Conservation Team:</u></p> <p>Agree with the Archaeology Team's point on collating information on buildings and other heritage assets of local interest.</p>	No changes made. No comments received from the Conservation Team.
	Action C, p.27		<p><u>Archaeology Team:</u></p> <p>It is not just buildings that might be considered non-designated heritage assets, it could be</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
			structures, earthworks, gardens, etc.
Chapter 6: Economy			
	Chapter 6		<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>The stated desire in 6.3 of “Reducing the impact of traffic on the High Street” is somewhat in contrast to the desire stated in 6.5 to bolster town centre parking provision and have “Additional short-stay off-street parking”.</p> <p>For visitors who are more mobile and who may be arriving from the M4 or via A4, it might be possible to consider additional parking provision on the northern outskirts (vicinity of Charnham Lane), coupled with clear wayfinding to the town centre, potentially passing the identified Primary Shopping Frontage of Great Grooms on route.</p>
Hungerford Town Centre sub-section (p.26)	Hungerford Town Centre sub-section (p.28)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We trust that there is close liaison with the group leading the emerging Hungerford Town Centre Strategy, building on the cross-referencing in Section 6 of the NDP?</p> <p>The stated desire in 6.3 of “Reducing the impact of traffic on the High Street” is somewhat in contrast to the desire stated in 6.5 to bolster town centre parking provision and have “Additional short-stay off-street parking”.</p> <p>For visitors who are more mobile and who may be arriving from the M4 or via A4, it might be possible to consider additional parking provision on the northern outskirts</p>	The Strategy is referred to in para 6.2.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		(vicinity of Charnham Lane), coupled with clear wayfinding to the town centre, potentially passing the identified Primary Shopping Frontage of Great Grooms on route.	
Para 6.2 (p.26)	Para 6.2 (p.28)	<p><u>Economic Development Team:</u></p> <p>Amend as follows:</p> <p><i>A town centre strategy for Hungerford is being prepared <u>developed</u> by West Berkshire Council <u>in partnership with Hungerford's stakeholders and local residents</u>. The purpose of the study is to develop a set of ideas that will enable Hungerford Town Centre to adapt and respond to the continuing changes in what is demanded of a town centre. This has been informed by the objectives of the Neighbourhood Plan.</i></p>	Changes made. No further comments.
Para 6.7 (p.27)	Para 6.7 (p.29)	<p><u>Archaeology Team:</u></p> <p>The Primary Shopping Frontages – is Appendix A available please? We note that Bridge Street does not appear to be included in the area of shops, though it does have some, and of a slightly different character.</p>	A new appendix (Appendix B) has been included in the submission version of the Plan. No further comments from the Archaeology Team.
Paras 6.6, 6.7, policy HUNG5 (pp.27 and 29)	Paras 6.6, 6.7, policy HUNG5 (pp.29 and 31)	<p>Reference is made to 'primary shopping frontages'. This needs to be changed to 'primary shopping areas' to align with the terminology in the NPPF. The NPPF defines a primary shopping area as:</p> <p><i>Primary shopping area: Defined area where retail development is concentrated.</i></p>	Change made, no further comments.
Para 6.6 (p.27)	Para 6.6 (p.29)	The text in this paragraph states that primary shopping frontages (areas) are retained mainly for retail, food and drink uses. This needs to be amended in line with the NPPF but obviously there is a recognition that permitted	Change made, no further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		development rights allow for changes of use within Class E without planning permission.	
Para 6.7 (p.27)	Para 6.7 (p.29)	This paragraph outlines that primary shopping frontages have been reviewed. The primary shopping frontage identified within the Plan is different to the primary shopping area proposed in the Local Plan Review . There is no justification for the deviation from the Local Plan Review .	<p>The additional evidence provided by the Qualifying Body is noted. Within the glossary of the NPPF, 'Primary Shopping Frontages' are defined as a "defined area where retail development is concentrated."</p> <p>It is the Council's view that the retail uses on the eastern side of the High Street to the south of Park Street are not as well integrated with the other retail uses on the High Street which fall within the Primary Shopping Area. In addition, the retail uses to the south of Park Street are interspersed with a public house, estate agents, and residential uses. The policy is therefore not in general conformity with policy SP18 of the Local Plan Review nor does it have appropriate regard to national policy.</p>
Figure 6.1 (p.28)	Figure 6.1 (p.30)	This figure should utilise the updated town centre commercial area boundary and primary shopping area as proposed in the Local Plan Review , unless justification/evidence is provided for its deviation.	See comments above. This figure should utilise the updated town centre commercial area boundary as set out in the adopted LPR.
Policy HUNG5 (p.29)	Policy HUNG5 (p.31)	<p><u>Development Management Team:</u></p> <ul style="list-style-type: none"> F – how would this part be assessed? Does it primarily relate to access? The public realm may not be within the red line and/or ownership of the applicant – does the policy relate to the interaction between the private and public realm too? 	No comments received from the Development Management Team.
		As currently written, the policy makes numerous references to the vitality of Hungerford town centre. In respect of town centres, the NPPF at para 90 comments that "planning policies should...a)...promote <i>their long-term vitality and</i>	<p>Changes noted.</p> <p>No changes made to criterion E. We suggest an amendment to use the word 'encourage'.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p><u>viability</u> <i>[our emphasis]</i>...”. The policy should be updated to make reference to viability. It could also be updated to reflect the NPPF glossary’s definition of main town centre uses.</p> <p>B – first sentence - as above the NPPF states that primary shopping areas are a defined area where retail development is concentrated. The policy states the predominant uses in the primary shopping frontages are expected to be retail and food and drink uses – to comply with national policy this should be retail uses.</p> <p>Local Plan Review policy SP22 talks about retail uses being encouraged in the primary shopping areas as changes in permitted development rights allow for the change of use of a retail unit to other uses within Class E without the need for permission, so this needs to be recognised hence the word encouraged rather than required.</p> <p>C-E – not all temporary uses require planning permission. In particular within Class E, changes of use can happen within the need for planning permission and in such circumstances this policy would not be applied.</p> <p>Criterion E could be combined into Criterion D and covered under amenity:</p> <p>We question how criterion F would be assessed. Does it relate primarily to access? The public realm may not be within the red line and/or ownership of the applicant – does the policy relate to the interaction between the private and public realm too? This is when design codes might be helpful.</p>	

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		<p>The Town and Country Planning Association have prepared a guidance document called 'Neighbourhood Planning and 20-minute Neighbourhoods Toolkit'. The chapter 'Community Facilities and Public Realm' includes some policies in adopted neighbourhood plans and it may be useful to refer to these. In addition, consideration might want to be given to the Mayor of London's 'Expanding London's Public Realm Design Guide' (https://www.london.gov.uk/sites/default/files/expanding_london_public_realm_combined_final.pdf).</p> <p>To make Criterion F clearer, it might be helpful to restructure the policy by including some sub-points of how the public realm will be enhanced. The public realm is generally defined as publicly owned spaces and places that are accessed by everyone. They can include accesses, streets, lanes, squares, pavements, parks, open spaces, conservation areas, public transport systems. Keep this definition in mind when considering how it can be enhanced.</p> <p>The policy uses the phrase 'supported' several times. Whilst this conveys a positive approach to development, generally 'encouraged' is considered as being more proactive.</p> <p>In light of the above, we suggest the following modifications:</p> <p><i>A. To secure the ongoing vitality and viability of Hungerford Town Centre Commercial Area, proposals which protect, enhance and promote a diverse range of main town centre uses – including retail, leisure, commercial, office, tourism,</i></p>	

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>cultural and community— will be supported encouraged, subject to the other policies in this Neighbourhood Plan.</p> <p>Primary Shopping Frontages Area</p> <p>B. To maintain the vitality and viability of the Hungerford Town Centre Commercial Area, the predominant uses in the primary shopping frontages-area, as shown on the Policies Map, are is expected to be retail (Use Class E (a)) and food and drink uses.</p> <p>Proposals for non-Class E retail uses will only be permitted where they do not result in a disproportionate concentration of non-Class E retail units that would be harmful to the vitality and viability of Hungerford Town Centre.</p> <p><u>Temporary uses</u></p> <p><u>Not all temporary uses require planning permission. Where planning permission is required:</u></p> <p>C. The use of premises for main town centre uses on a temporary basis will be supported encouraged in the Hungerford Town Centre. Such uses include ‘pop up’ shops and cultural, creative and leisure uses introduced on a temporary basis or for specific events.</p> <p>D. Such uses must demonstrate that they will not have a detrimental significant adverse impact on amenity of neighbouring uses, particularly residential through excessive noise and pollution (noise, odour, waste collection, highways and parking).</p>	

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>E. Such uses will generally not be considered appropriate if the operation of the business requires large amounts of vehicle parking in order to function unless sufficient parking arrangements have been presented.</p> <p><u>Public realm</u></p> <p>F. Proposals <u>will be expected to</u> which <u>enhance the public realm through: quality and accessibility</u> (specifically for pedestrians and disabled users) of the public realm in Hungerford Town Centre will be supported.</p> <p>(i) <u>Improving inclusivity by demonstrating a good level of public accessibility;</u></p> <p>(ii) <u>>>>></u></p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We share the desire to see proposals that will enhance the quality and accessibility of the public realm in the town centre. We would encourage further joint work to provide additional cycle parking as part of any town centre revisions, to enable access by cyclists as well as by pedestrians, disabled users and others.</p>	
			<p>Action D (Action C in the pre-submission version) has been updated to include reference to cycling.</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We share the desire to see proposals that will enhance the quality and accessibility of the public realm in the town centre.</p> <p>We are already in contact with the Town Council regarding additional cycle parking as part of any town centre revisions, and there is a shared desire to enable access by cyclists as well as by pedestrians, disabled users and others.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
			<p>We note the aspiration within the Action D subsection to:</p> <p><i>“Enhance Hungerford High Street and Bridge Street between Charnham Street and Atherton Road by slowing traffic and improving the pedestrian environment.”</i></p> <p>Effective physical measures would be required to slow traffic and minimise the need for enforcement by the police. Subject to further assessment, this may be done in conjunction with creating more footway space for people wishing to walk through the town and browse on route. To achieve this, it may be necessary to remove some on-street parking e.g. in Bridge Street and reappraise the use of space, including existing laybys, in the High Street. Provision of bus boarders at the ‘Hungerford Canal Bridge’ bus stops, if feasible, may would ease access for people arriving by bus, allowing buses to pull up against a section of kerb and passengers to board and alight.</p> <p>Careful consideration needs to be given to the siting of the “additional off-street short stay car parking within easy reach of the town centre” that the NDP seeks, in order that related traffic movements do not add to congestion and pollution in the town. It is suggested that a site on the northern outskirts, accessible from A338/M4, A4 and B4192 and bolstered by pedestrian wayfinding signs to/from town centre, may be appropriate if one can be identified, if the objective of reducing additional traffic impact on the High Street is to be attained.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
			Sufficient dedicated spaces should be allocated and incoming electricity feeds provided to support the introduction of fast and rapid Electric Vehicle Charge Points within existing and any new off-street car parking areas, with these charge points complying with the requirements of PAS 1899:2022 Electric vehicles – Accessible charging – Specification.
Action C (p.29)	Action D (p.31)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We note the aspiration to: Enhance Hungerford High Street and Bridge Street between Charnham Street and Atherton Road by slowing traffic and improving the pedestrian environment.</p> <p>Effective physical measures would be required to slow traffic and minimise the need for enforcement by the police. This could be done in conjunction with creating more footway space for people wishing to walk through the town and browse on route. To achieve this, it may be necessary to remove some on-street parking e.g. in Bridge Street and reappraise the use of space, including existing laybys, in the High Street. Provision of bus boarders at the 'Hungerford Canal Bridge' bus stops would ease access for people arriving by bus, allowing buses to pull up at a section of kerb and passengers to board and alight.</p> <p>Careful consideration needs to be given to the siting of the "additional off-street short stay car parking within easy reach of the town centre" that the NDP seeks, in order that related traffic movements do not add to congestion and pollution in the town. It is suggested that a site on the northern outskirts, accessible from A338/M4, A4 and B4192 and bolstered by pedestrian wayfinding signs to/from town</p>	No further comments received from the Sustainable Travel Team & Transport Policy Team.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>centre, may be appropriate if one can be identified, if the objective of reducing additional traffic impact on the High Street is to be attained.</p> <p>Sufficient dedicated spaces should be allocated and incoming electricity feeds provided to support the introduction of fast and rapid Electric Vehicle Charge Points within existing and any new off-street car parking areas, with these charge points complying with the requirements of PAS 1899:2022 Electric vehicles – Accessible charging – Specification.</p> <p>We are unsure if policy HUNG5 relates to Action C (ii) and / or (iii).</p>	
Para 6.9, 4 th sentence (p.30)	Para 6.9 (p.30)	The Former Oakes Brother's site is vacant land but the permission for residential on this site has lapsed. It remains part of the Designated Employment Area.	Sentence which refers to the former Oakes Brother's site has been deleted. No further comments.
Para 6.9, 5 th sentence (p.30)	Para 6.9, final sentence (p.30)	This sentence conflicts with policies within the Local Plan Review . Proposals which require HGVs in this location would be assessed for their suitability as part of a planning application by the Highways Team. The text could encourage proposals which limit HGV movements, but as currently written this conflicts with Local Plan Review. We suggest deletion of this final sentence as currently written.	No changes made. Previous comments made at the Regulation 14 stage remain – the final sentence should be deleted.
Figure 6.2 (p.31)	Figure 6.2 (p.33)	Protected Employment Areas to be renamed in the Local Plan Review to Designated Employment Areas (DEAs). This figure should utilise the updated DEA boundaries as proposed in the Local Plan Review.	Figure 6.2 needs to be updated to refer to Designated Employment Areas, which is the term used in the policy SP17 of the LPR.
Para 6.10 (p.32)	Para 6.10 (p.34)	<p><u>Archaeology Team:</u></p> <p>This paragraph appears to be the first one where reuse of farm buildings is mentioned. There are over 20 historic</p>	Paragraph updated to make reference to historic farmsteads. No further comments from the Archaeology Team.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		farmsteads in the parish, and these could be considered for appropriate redevelopment for various purposes.	
Para 6.11 (p.32)	Para 6.11 (p.34)	<u>Archaeology Team:</u> Hungerford Town's street pattern, ie. the burgage plots mentioned above, is a key part of its historic integrity and could be mentioned again here.	Paragraph updated to refer to burgage plots. No further comments from the Archaeology Team.
Action D (p.32)	Action E (p.34)	<u>Sustainable Travel Team & Transport Policy Team:</u> Action D ii: we note the aspiration to: Encourage the relocation of Station Road employment area sites that generate heavy goods vehicle movements via Park Street. This spurs a question regarding where these employment sites, originally established when freight was commonly moved by rail, might be relocated. Is the NDP team's preference that they should be encouraged and enabled to relocate to Charnham Park, for example? Would there be sufficient available room within the existing designated Charnham Park employment area to allow this to happen? Should any relocations from the Station employment area take place, then it is likely that this would result in brownfield sites close to town centre facilities and the railway station that may be desirable to developers for potential residential development.	Action updated to refer to 'more appropriate locations'. No further comments from the Sustainable Travel Team & Transport Policy Team.
Action D (ii) (p.32)	Action E (p.34)	Encouraging relocation of employment uses away from the Designated Employment Area (DEA) conflicts with Local Plan Review policies. Suggest deletion or amend text to encourage proposals which limit HGV movements to and from Station Road DEA.	Action updated. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
	Action E (p.34)		<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>With regard Section 6, Action E ii: we note the aspiration to: <i>“Encourage the relocation of occupiers of the Station Road employment area sites which generate heavy goods vehicle movements via Park Street to more appropriate locations”.</i></p> <p>Emphasis could potentially be placed on encouraging employers to consider alternative locally sites specifically at Charnham Park, given comparative ease of access via M4/A338/A4.</p>
Action E (p.32)	Action F (p.34)	<p><u>Archaeology Team:</u></p> <p>Action E: Tourism iii – it might be useful to identify the local organisations that would promote Hungerford. Presumably the North Wessex Downs National Landscape, but could there be a tie in with Visit Newbury?</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>Action E: we note the proposed activities intended to boost tourism.</p> <p>We note the aspiration to provide a drop-off point and parking for a minimum of two coaches, with level access to the High Street. We are aware that the Town Council has sought to provide a drop-off facility to the front of the Town Hall, with bus routes having been adjusted to serve the stop in Church Street instead of the Town Hall to allow for the coach drop-off, however access appears to remain an issue on Market Days. This again points to a case for review of</p>	<p>Local organisations now referred to within the Action. No further comments.</p> <p>An additional reference to the Great West Way has been included within the reference.</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>With regard Section 6, Action F subsection: we note the aspirations to:</p> <p><i>(ii) Consider a review of the allocation of road space to provide drop-off and parking facilities for coaches in order to align with the requirements of the Town Square project; and</i></p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>roadspace allocation in the town centre, in conjunction with the emerging Town Centre Strategy.</p> <p>A bus/coach parking stand already exists in Charnham Park (https://www.google.com/maps/place/Hungerford/@51.4198808,-1.5132536,3a,75y,139.88h,75t/data=!3m6!1e1!3m4!1suXFuN09XWZovhKRPT9pLfw!2e0!7i16384!8i8192!4m6!3m5!1s0x48714d0b145b6027:0xe6c296e3baff5e41!8m2!3d51.412345!4d-1.517995!16zL20vMDF6NTR6?entry=tts), within walking distance of the fuel station/supermarket, enabling at least one coach to park without visual impact on the town centre. A second marked parking stand is located on the A4 Charnham Street (https://www.google.com/maps/place/Hungerford/@51.4185618,-1.5148767,3a,75y,206.58h,87.24t/data=!3m6!1e1!3m4!1sXwihfXoAfkSJcQp_df1-DQ!2e0!7i16384!8i8192!4m6!3m5!1s0x48714d0b145b6027:0xe6c296e3baff5e41!8m2!3d51.412345!4d-1.517995!16zL20vMDF6NTR6?entry=tts), west of the BMW dealership, with the layby shared with the adjoining, marked local bus stop.</p> <p>We would urge further collaboration with Great Western Railway, under the existing 'Great West Way' banner which GWR are already involved with, to encourage tourists to travel to Hungerford by train. We note the related points under Action F which could support this.</p>	<p>(iii) <i>Work with local organisations to promote Hungerford as a tourist destination such as the North Wessex Downs National Landscape, Visit Newbury and the Great West Way.</i></p> <p>We consider that point (iii) better expresses the desire than point (i) which could perhaps be deleted.</p> <p>We note the aspiration to provide a drop-off point and parking for a minimum of two coaches, with level access to the High Street. We are aware that the Town Council has sought to provide a drop-off facility to the front of the Town Hall, with bus routes having been adjusted to serve the stop in Church Street instead of the Town Hall to allow for the coach drop-off, however access appears to remain an issue on Market Days. This again points to a case for review of roadspace allocation in the town centre, in conjunction with the emerging Town Centre Strategy.</p> <p>A bus/coach parking stand already exists in Charnham Park (https://www.google.com/maps/place/Hungerford/@51.4198808,-1.5132536,3a,75y,139.88h,75t/data=!3m6!1e1!3m4!1suXFuN09XWZovhKRPT9pLfw!2e0!7i16384!8i8192!4m6!3m5!1s0x48714d0b145b6027:0xe6c296e3baff5e41!8m2!3d51.412345!4d-1.517995!16zL20vMDF6NTR6?entry=tts), within walking distance of the fuel station/supermarket, enabling at least one coach to park without visual impact on the town centre. A second marked</p>

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			<p>parking stand is located on the A4 Charnham Street (https://www.google.com/maps/place/Hungerford/@51.4185618,-1.5148767,3a,75y,206.58h,87.24t/data=!3m6!1e1!3m4!1sXwihfXoAfKsJcQp_df1-DQ!2e0!7i16384!8i8192!4m6!3m5!1s0x48714d0b145b6027:0xe6c296e3baff5e41!8m2!3d51.412345!4d-1.517995!16zL20vMDF6NTR6?entry=tts), west of the BMW dealership, with the layby shared with the adjoining, marked local bus stop.</p>
Chapter 7: Getting About			
Chapter 7 (p.34)	Chapter 7 (p.36)	<p><u>Rights of Way Team:</u></p> <p>Section 7 refers to getting about, and this seems quite narrow as it only seems to be primarily concerned with transport rather than also including leisure. We fully support aims for improvement, especially where it involves Public Rights of Way. However, we do not think it ambitious enough in not addressing promotion of walking and cycling for leisure or tourism.</p> <p>There are references to the Hungerford Railway Station being at the heart of the AONB, yet there is no design to further this regarding walking and cycling from a leisure or tourism perspective. We would suggest the following could be aspirations worth considering within the NDP to be developed either by the Town Council, West Berkshire Council or a partnership of both:</p> <ul style="list-style-type: none"> • Improve canal towpath east to Kintbury to provide a safe walking / cycling route between the two. 	<p><u>Rights of Way Team:</u></p> <p>There should also be more ambition to improve accessibility to the commons. There is clear potential for fully accessible routes on many of the commons. This needs to be balanced with the special nature of these environments, however, suitable improvements can help protect these environments by reducing “Off route” footfall by nature of designed routes being easier to follow. The different commons have distinct landscape, composition, and environment, which produces both differing challenges, but also opportunities. These routes could make Hungerford a destination location for tourists, especially arriving by train as the distance to countryside from town is close compared to many such settings.</p>

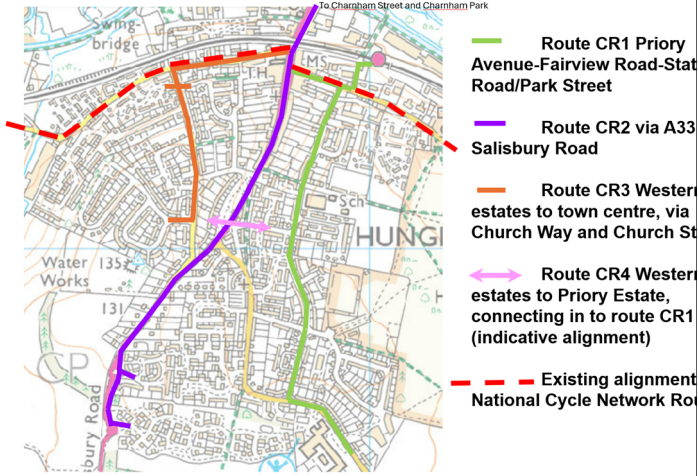
Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<ul style="list-style-type: none"> • Improve Towpath Eastwards towards Wiltshire to connect with NCR 4 and Froxfield (onwards to Bedwyn and Pewsey vale). Both have leisure and active travel potential. • Improve Rights of Way on Freemans Marsh. Aim for easy access circular routes as an attractive reason to visit Hungerford. Easy access route towards Cobbs as a destination. • Improve interface with Lancaster Park and Public Footpath South (HUNG/31/2). • Development at Smitham Bridge Road should consider S106 requirements to improve Public Footpath (HUNG/46/1). Maybe improving to Bridleway or Cycle route. It could provide alternative access to Hungerford to the A338 from the south and not have the gradient change the road route has. 	
Figure 7.1 (p.35)	Figures 7.1 and 7.2 (p.38)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We note and welcome the Town Council NDP team's aspiration to "focus on making improvements for pedestrians and cyclists in order to encourage more walking and cycling".</p> <p>We note within Figure 7.1 the identification of the canal towpath, alignment A, as having potential for improvement and would again encourage discussions with interested parties such as Sustrans and Canal & River Trust on investigating creation of a shared use route moving forwards, given the economic, congestion and indirect health benefits to other towns such as Newbury from having traffic-free access by bike and walking into the town centre along the canal corridor.</p>	<p>The key walking and cycling routes have now been separated out – Figure 7.1 now illustrates just the key walk routes, and a new map (Figure 7.2) shows the key cycle routes.</p> <p>No further comments from the Sustainable Travel Team & Transport Policy Team.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>However, we would advocate clearly separating-out Key Walking Routes, and separately designating and developing a network of Key Cycling Routes (if there is genuine will to consider reallocating roadspace or introducing measures to make the town more cycling-friendly), accepting that there is some limited scope to consider creating short sections of shared-use by cyclists and pedestrians. This is in light of the following aspects of Figure 7.1:</p> <ul style="list-style-type: none"> • Route B: the northern section, emerging by the John O'Gaunt pub, is currently only suitable as a pedestrian route and is currently signed (parallel to The Forge) as Cycling Prohibited. Does the NDP team aspire to its adaptation/re-routing and designation for shared cycling- and walking use? • Route C – Primary School to High Street: the footway between Fairview Road and High Street is narrow (under 2 metres width at its far eastern and western ends), with a right-angle turn at its western end and chicane barriers at its eastern end and a steep gradient making it unsuited to shared use • Route D – Priory Road to Lancaster Park: again this is currently for pedestrian use only, with the footway from Beacon Rise and Jethro Tull Lane in the new residential development connecting into a Public Footpath through to Priory Road. The footpath is currently narrow, affected by intruding vegetation and has a bend. If it was to be re-designated by agreement for shared use, this would require consultation, creation of an order, and signing making it clear that pedestrians have priority. Making it shared use could make it easier for cyclists to connect into Route CR1 mentioned below. 	

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		<ul style="list-style-type: none"> Route F – Priory Place alleyway: this route between Priory Estate (Priory Road) and High Street, crossing Tarrants Hill, is narrow, incorporates steps and is currently signed as Cycling Prohibited. 	
Policy HUNG6 (p.36)	Policy HUNG6 (p.39)	<ul style="list-style-type: none"> The policy uses the term 'supported' several times. The term 'encouraged' is considered to be more proactive. Some of the other policy wording within criterion E needs to be re-worded for clarity as follows: <p><i>E. Development <u>proposals</u> within or close to Hungerford Town Centre Commercial Area <u>that are</u> which is designed to reduce dependence on car use will be strongly supported <u>encouraged</u>.</i></p> <p><u>Development Management Team:</u></p> <p>Those that involve public rights of way may involve a request from the Public Rights of Way team for a commuted sum.</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We welcome the thrust of this policy. However, we would advocate consideration of the routes shown in Figure 7.1 primarily as Key Walking Routes given the nature of many of these links.</p> <p>This could be coupled with separate identification and designation of a network of Key Cycling Routes; there needs to be an acceptance that some Key Cycling Route sections will have to remain on road, accompanied by measures to encourage motorists to be considerate of cyclists.</p>	<p>Changes made, no further comments.</p> <p>No comments received from the Development Management Team.</p> <p>Figure 7.2 now includes seven key cycle routes.</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We note and welcome the Town Council NDP team's aspiration to "focus on making improvements for pedestrians and cyclists in order to encourage more walking and cycling".</p> <p>We very much welcome the updated Policy HUNG6 in respect of Key Walk/Cycle Routes, coupled with incorporation of Figure 7.2 Key Cycle Routes where the routes broadly reflect our suggestions made in</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>Subject to further discussion, additional Key Cycling Routes might include:</p> <ul style="list-style-type: none"> Route CR1 Priory Avenue-Fairview Road-Station Road/Park Street. Connecting John O’Gaunt Leisure Centre and School, Priory Estate, Hungerford Primary School, Railway Station, current National Cycle Network route 4 alignment, and High Street via Park Street. The football ground and Triangle Field/rugby ground are also in close proximity of this route. Envisaged as being an on-road route, indicated by signing, lining and proportionate measures to deter speeding. Route CR2 via A338 Salisbury Road. Connecting the two recent developments south of Hungerford (Lancaster Park and Kennedy Meadow) directly to the town centre, linking in to the existing, short, shared cycle- and pedestrian routes on approach to the two new estates. Could be extended through to Charnham Street and Charnham Park, passing the green space on Canal Walk, to encourage cycling to work, help offset the impact of traffic on the High Street and encourage low speeds for motor vehicles. Again, envisaged as being an on-road route, indicated by signing, lining and proportionate measures to encourage compliance with signed speed limits and consideration of vulnerable users. Route CR3 Western estates to town centre, via Church Way and Church Street. Connecting the established residential estates west of the A338 with the High Street and current National Cycle Network 	<p>response to the preceding Regulation 14 NDP consultation.</p> <p>Moving forwards, we would encourage positive discussions with interested via the existing Reimagining the Kennet & Avon Canalside initiative (https://greenhamtrust.com/canal/), on the feasibility of converting the canal towpath to a multi-user route, to potentially allow considerate cycling as well as walking between other towns and Hungerford along the traffic-free canal corridor. This would require identification of resources locally to enable a feasibility study to be commissioned.</p> <p>We welcome the chance to work with the Town Council to expedite provision of additional cycle parking in the town centre as part of possible broader streetscape proposals, building on where we previously provided stands close to the doctors’ surgery and in the High Street.</p> <p>We note under Action G, point i, the desire to work with WBC Highways Team to explore possible schemes to minimise the effects of traffic in the town centre and especially the High Street for the benefits of pedestrians and all road users. This would be dependent on availability of design resources and funding to undertake development work, consultation and implementation.</p> <p>We note under Action G, point ii, the aspiration to improve the rail services and facilities at Hungerford Station linked to the wider aspirations to boost tourism in the town. However, the change in travel</p>

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		<p>route 4 alignment, with onward connection to the railway station. Again, envisaged as being an on-road route, with appropriate signing and lining.</p> <ul style="list-style-type: none"> • Route CR4 Western estates to Priory Estate, connecting in to route CR1. Conceivably this might involve investigation of closure of Tarrants Hill to through traffic east of Priory Place alleyway, adjustments to the wide bellmouth of the one-way section of Priory Road, and a facility to cross from Atherton Crescent or Atherton Way. This could also connect to the Atherton Crescent green space <p>These are shown on the graphic below. This is in addition to the current alignment for the established National Cycle Network route 4 (https://www.sustrans.org.uk/find-a-route-on-the-national-cycle-network/route-4/), which is signed via Park Street, High Street, Church Street and Smitham Bridge Road.</p>	<p>patterns post-Covid makes securing rail industry investment more of a challenge. Construction of a waiting room with toilets would also require engagement with Network Rail, in addition to GWR. This brings with it questions surrounding staffing of such a facility and how its revenue costs would be borne, long-term.</p> <p>We note and strongly support the aspiration in Action G, point v to introduce electric vehicle charging infrastructure. This could be achieved through existing contracts let by West Berkshire Council, to enable provision of:</p> <ul style="list-style-type: none"> • Additional on-street Electric Vehicle Charge Points (EVCPs) – trickle-chargers - fed from existing lighting circuits, complementing the eight existing such EVCPs • Rapid/fast-charge EVCPs on-street • Rapid/fast-charge EVCPs within existing and any new off-street parking areas <p>We welcome the chance to continue positive liaison with the Town Council on provision of EVCPs and associated electricity supplies.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		 <p>We welcome the chance to discuss provision of additional cycle parking in the town centre as part of possible broader streetscape proposals, building on where we previously provided stands close to the doctors' surgery and in the High Street.</p>	
Para 7.4 (p.36)	Para 7.4 (p.39)	<p><u>Archaeology Team:</u></p> <p>Hungerford certainly is located at the heart of the National Landscape but we do not think it is true to say there are only two railway stations in the North Wessex Downs – apart from Hungerford and Kintbury on the London line to the southwest, there is also Pangbourne on the line going north. Outside West Berkshire, there is Bedwyn and Pewsey in Wiltshire and Cholsey in Oxon and in Hampshire Overton and Whitchurch are just on the edge.</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p>	Paragraph amended. No further comments from the Archaeology Team or Sustainable Travel Team & Transport Policy Team.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		The statement that Hungerford is one of only two stations in the North Wessex Downs National Landscape is somewhat misleading. For reference, stations in the NWD NLA on the Berks & Hants line include Hungerford and Kintbury in West Berkshire, plus Bedwyn and Pewsey further to the west in Wiltshire. In addition, Pangbourne and Goring & Streatley stations on the Didcot-Reading line also lie within the NWD NLA.	
Para 7.5 (p.36)	Para 7.5 (p.39)	<u>Sustainable Travel Team & Transport Policy Team:</u> HGV's using Park Street and the surrounding country lanes are likely to be doing so for a reason (eg. accessing the employment sites near to the station or rural businesses). Is there any evidence to suggest that there is an HGV 'rat-running' issue on rural routes?	Text updated to include an example of 'rat-running'. No further comments from the Sustainable Travel Team & Transport Policy Team.
Para 7.6 (p.36)	Para 7.6 (p.40)	<u>Archaeology Team:</u> Perhaps 'a reduction in traffic noise' would read better than traffic noise...benefits.	Paragraph updated. No further comments from the Archaeology Team.
Action F (p.37)	Action F (p.40)	<u>Sustainable Travel Team & Transport Policy Team:</u> We note in point i, the desire to work with WBC Highways Team to explore possible schemes to minimise the effects of traffic in the town centre and especially the High Street for the benefits of pedestrians and all road users. This would be dependent on availability of design resources and funding to undertake development work, consultation and implementation. This also applies to points iii and iv. We strongly support the aspiration in point ii to improve the rail services and facilities at Hungerford Station particularly given the NDP aspirations to boost tourism in the town.	No further comments from the Sustainable Travel Team & Transport Policy Team.

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		<p>However, the change in travel patterns post-Covid makes securing rail industry investment more of a challenge. Construction of a waiting room with toilets would also require engagement with Network Rail, in addition to GWR. This brings with it questions surrounding staffing of such a facility and how its revenue costs would be borne, long-term.</p> <p>We are aware that the Town Council has previously ‘adopted’ Hungerford station in recent years. Has any consideration been given towards continuing or reinstating adoption of the station? GWR, working with partners, have a long-term interest in seeing community involvement in helping keep local rail stations on their network even cleaner, tidy and appealing, and to help deliver small-scale improvements eg. flower planters.</p> <p>We note and support the aspiration in point ii(b) to provide additional long-stay parking for the railway station, should any appropriate locations be identified. However, as shown by the recent sale of the former Oakes Bros (and GWR temporary car park) site, there may well be competition for the land from residential developers, which may cause an issue in terms of the cost for acquiring suitable sites.</p> <p>We would be supportive of measures to introduce a Kennet & Avon Community Rail Partnership on the Berks & Hants line and the aspirations to enhance connections to the West Country. However, we are also aware that there may be wider funding issues relating to the setting up and on-going support for such a partnership.</p> <p>We note the concerns regarding the use of Park Street and the rural routes listed in point iv by heavy goods vehicles as</p>	

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		<p>such routes are unlikely to have been designed or suitable for freight movements. The area surrounding Hungerford is predominantly rural, with a number of agricultural businesses, which rely on the rural network for the day-to-day running of their businesses, and it is likely to be the case that the vast majority of HGVs using these routes are likely to be doing so for a reason. Should any of these be taken forward, it is likely that detailed investigations would be required to determine legitimate freight usage/routeing and to identify possible solutions.</p> <p>We note and strongly support the aspiration in point v to introduce electric vehicle charging infrastructure. This could be achieved through existing contracts let by West Berkshire Council, to enable provision of:</p> <ul style="list-style-type: none"> • Additional on-street Electric Vehicle Charge Points (EVCPs) – trickle-chargers - fed from existing lighting circuits, complementing the eight existing such EVCPs • Rapid/fast-charge EVCPs on-street • Rapid/fast-charge EVCPs within existing and any new off-street parking areas <p>We would welcome the chance to continue positive liaison with the Town Council on provision of EVCPs and associated electricity supplies.</p>	
Chapter 8: Leisure, Wellbeing, Public Safety and Learning			

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
8.2 (p.40)	8.2 (p.43)	The supporting text states that most of the existing play facilities are in good condition. It might be useful to expand on this and provide details of the condition of each facility, particularly as it will help when monitoring the Plan.	It is noted that this paragraph refers to an annual survey that is carried out. This can be used when monitoring the policy.
Policy HUNG7: Play and Youth Facilities (p.40)	Policy HUNG7: Play and Youth Facilities (p.40)	<p><u>Development Management Team:</u> Maintenance would be a S106 matter. It is unclear whether provision is expected as development in its own right or alongside residential proposals – which is usually a requirement of the current development plan for residential schemes (see policy RL1 of the West Berkshire District Local Plan 1991 – 2006 (Saved Policies 2007) and policy DM40 of the Local Plan Review).</p> <ul style="list-style-type: none"> • Further to the comments from the Development Management Team, maintenance could be covered as an action. • The policy currently uses the phrase ‘supported’. The term ‘encouraged’ is considered to be more proactive. • In light of this and the comments above from the Development Management Team, the following changes are suggested: <p>Development proposals that involve the provision and maintenance (including periodical upgrades) of play and youth facilities to serve the community of Hungerford will be strongly supported encouraged.</p>	Changes made. No further comments.
	Action J (p.44)		<p><u>Sports and Leisure Team:</u></p> <p>Approach Everyone active, Hungerford, to enquire how existing facilities could be used to provide a table tennis space for young people, without the need to build a purpose built facility. Discussions could include addressing the current programme, to</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
			investigate if this could be adapted to allow for table tennis to be provided.
Para 8.5 (p.43)	Para 8.5 (p.46)	<u>Archaeology Team:</u> How are Common Port Down, Freeman's Marsh, the Memorial Avenue and the Croft protected exactly? Does this mean no development is allowed here? There might be other threats, eg. from climate change.	Paragraph updated to explain about the protection of the areas. No further comments from the Archaeology Team.
Para 8.9 (p.45)	Para 8.9 (p.48)	<u>Archaeology Team:</u> The canal wharf – we think there could be opportunities to increase interpretation here, especially with the Bath Stone canal warehouse still a prominent feature.	No further comments from the Archaeology Team.
Para 8.12 (p.45)	Para 8.12 (p.45)	The supporting text at para 8.12 explains that health and wellbeing is fundamental to the prosperity of the local community. However, what has informed this assertion – has the local community identified this as part of the preparation of the Plan?	No further comments from the Archaeology Team.
Para 8.13 (p.48)	Para 8.13 (p.51)	<u>Archaeology Team:</u> Mention of the Environment Act – this is not directly our area, but we were surprised that BNG is mentioned under Health and Wellbeing rather than being discussed under Climate Change and Biodiversity.	No further comments from the Archaeology Team.
		<u>Environment Delivery Team:</u> Has the Ecology Team been consulted on this wording. We do not think that it is written clearly enough.	The Ecology Team provided comments as part of the pre-submission (Reg 14) consultation. They did not raise any queries with this paragraph.
		It would be more appropriate for Paragraph 8.13 which deals with biodiversity net gain under the Environment Act 2021 to be moved to the reasoned justification for Policy HUNG11 Wildlife friendly development. (paragraph 9.6) Environment Act 2021 and not 2022.	Change made to correct the date of the Environment Act. No further changes made.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
Para 8.14 (p.48)	Para 8.14 (p.51)	<p><u>Environment Delivery Team:</u></p> <p>This is a little disjointed and unclear. It is recommended that there is input from the Ecology Team.</p>	The Ecology Team provided comments as part of the pre-submission (Reg 14) consultation. They did not raise any queries with this paragraph.
Action J (p.50)	Action K (p.53)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We note in point iii, the desire to “trial 20mph zones”, which could aid and encourage active travel. West Berkshire Council’s Traffic Services Team is developing a document setting out criteria for consideration in context of suggested 20mph streets and zones that, when completed, will help with assessment of locations that have been put forward in towns in the District.</p>	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>With regard Action K, point iii, the desire to “trial 20mph zones”; West Berkshire Council’s Traffic Services Team is developing a document setting out criteria for consideration in context of suggested 20mph streets and zones that, when completed, will help with assessment of locations that have been put forward within the District. It is critical to note that due to limitations on police resources, such signed speed limits need to be effective in their own right, without relying on police attendance to enforce.</p>
Chapter 9: Climate Change and Biodiversity			
Para 9.2 (p.53)	Para 9.2 (p.56)	<p><u>Environment Delivery Team:</u></p> <p>Delete paragraph. In 2016, the residential sector alone accounted for over 16% of the UK’s annual greenhouse gas emissions (source: Department for Business, Energy and Industrial Strategy). The total emissions from all building types will therefore be much greater. Standards for environmentally sustainable homes and developments are established through Building Regulations and West Berkshire Local Plan policies. However, in order for the built development to make a meaningful contribution towards</p>	No changes made. No further comments made on this paragraph by the Environment Delivery Team.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		achieving net zero by 2050, a development needs to go as far as it possibly can. New developments are required to meet the requirements of Local Plan policy ⁶ or, if feasible encouraged to exceed Local Plan Policy requirements ⁶ .	
Policy HUNG9: Wellbeing and Safety Through design (p.51)	Policy HUNG9: Wellbeing and Safety Through design (p.54)	<p><u>Development Management Team:</u></p> <ul style="list-style-type: none"> A – comment that maintenance would be secured through S106 for which there is a specific SPD. B – suggestion to check with SuDS team that this reflects current policy/approach – there are occasions where deep SuDS features may not be safe to be part of public green spaces. D – suggest consider whether ‘encouraged’ is necessary as we believe it is a requirement. 	Criterion A and D updated. The Council’s Drainage Team have been consulted, however no comments have been received. Nonetheless, criterion B has been updated to include the wording ‘where appropriate’.
		<ul style="list-style-type: none"> Is there any local evidence behind this policy? <p><u>Criterion A:</u></p> <ul style="list-style-type: none"> The ongoing programme of maintenance should be secured via S106 legal agreement and this could be added to the policy wording. <p><u>Criterion B:</u></p> <ul style="list-style-type: none"> Criterion B is not in general conformity with policies CS16 and SP6. These two policies require surface water to be managed on all development sites, regardless of flood risk, through the implementation of SuDS. The Council has an adopted SuDS SPD and these must be delivered in accordance with the Council’s adopted SuDS SPD. Some SuDs systems may not be appropriate to be used by residents due to safety and as such it is suggested to amend the word ‘possible’ to ‘appropriate’. 	<p>No updates made to the supporting text to set out what local evidence there is behind the policy. It was a suggestion that this could be included.</p> <p><u>Criterion A:</u></p> <ul style="list-style-type: none"> Criterion A has been updated to refer to a S106 agreement. No further comments. <p><u>Criterion B:</u></p> <ul style="list-style-type: none"> Criterion B updated to include the term ‘appropriate’. Other comments made at the Regulation 14 stage remain. We question whether there is a need to include a requirement for SuDS, when strategic policy already includes requirements for SuDS. We recommend that Criterion B is deleted.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<ul style="list-style-type: none"> We do not think it is necessary to include criterion B as there are strategic policies which already cover the provision of SuDS. The NPPF at paragraph 16 (f) of the NPPF states that: “Plans should ...f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).” It is important to remember that the Hungerford NDP when adopted will form part of the development plan. The development plan policies should be viewed together and not in isolation. We note that SuDS is also covered within policy HUNG10. <p><u>Criterion D:</u></p> <ul style="list-style-type: none"> This criterion encourages development proposals to minimise through design the opportunities for crime. This is not in general conformity with strategic policies CS14 (Core Strategy) and SP7 (Local Plan Review), as these policies the design of development to demonstrate how crime will minimise the opportunities for crime. Policy SP7 states that development proposals to show how they have responded to both local and national design guidance, including the National Design Guide. It should be noted that the Council’s adopted Quality Design SPD (https://www.westberks.gov.uk/spd-quality-design) sets out that all development schemes should be designed to reduce the potential for criminal activity and anti-social behaviour. Furthermore, P2 of the National Design Guide (https://www.gov.uk/government/publications/national- 	<p><u>Criterion D:</u></p> <ul style="list-style-type: none"> Criterion D updated as suggested. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>design-guide) requires the provision of well-designed spaces that are safe.</p> <p><i>D. Development proposals is encouraged to must demonstrate, through its design, how it will minimise the opportunities for crime to occur.</i></p>	
Policy HUNG10: Low Energy and Energy Efficient Design (p.54)	Policy HUNG10: Low Energy and Energy Efficient Design (p.57)	<p><u>Development Management Team:</u></p> <ul style="list-style-type: none"> This policy seems to go beyond the development plan by applying to redevelopment and refurbishment (which may not in itself need planning permission). B, d – this appears not in accordance with the NPPF and the local development plan by saying mitigation and resilience measures for climate change increases in flood risk are only needed ‘where possible’. We believe this is a requirement and not an option. 	<p>Strategic policy SP5 of the LPR has regard to climate change. It sets out that depending on the nature and scale of proposals, development should satisfy a range of criteria. This includes generating and supplying renewable, low and zero carbon energy for its own use.</p> <p>Criterion B(b) has been updated following advice from the Council’s Environment Delivery Team.</p> <p>Criterion B refers to all developments, and this aligns with the paragraph 158 of the NPPF which states that policies should support appropriate measures.</p>
		<p><u>Environment Delivery Team:</u></p> <p>Amend criterion B and its sub-points as follows:</p> <p><i>B. All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:</i></p> <p>a) Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements; <i>Wherever possible, new buildings shall be orientated to maximise the opportunities for natural lighting.</i></p>	<p>Suggested changes made. No further comments received from the Environment Delivery Team.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p><u>heating and ventilation; and reduce exposure to wind and other elements;</u></p> <p>b) Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change, for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc; <u>Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resilience to climate change. For example, consider where feasible, measures such as solar shading, thermal mass, efficient heating and ventilation, green and brown roofs, and green walls. Durable materials should also be considered in both internal and external areas which are at risk of being exposed to weather and climatic variations or are at risk of high volumes of traffic/through-flow from occupation;</u></p> <p>c) Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and <u>As part of a developments landscape scheme, consider, where appropriate, the use of native trees and other planting to provide shading for amenity areas, buildings and streets. The landscape design should also consider connecting and supporting habitats to thrive and where possible be resilient to predicted climatic change; and</u></p>	

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>d) All development shall minimise surface water runoff to prevent off-site flooding through the design of a suitable SuDS-based drainage system, and where possible incorporate mitigation and resilience measures for any increases in flood risk that may occur due to climate change. In particular development should also maximise the use of porous surfaces on open areas such as driveways.</p> <ul style="list-style-type: none"> • The supporting text to the policy refers to the Climate Change Act and UK-wide data on greenhouse gas emissions. However, it is unclear if there is any Parish-level evidence behind the policy or if through community engagement there is a local desire for such a policy. • The policy deals with a range of matters, wider than just energy efficient design, for example SuDS and minimising the use of resources in general. The policy title could be changed to 'sustainable design'. • We do not consider it necessary to include criterion D as there are strategic policies which already cover the provision of SuDS. The NPPF at paragraph 16 (f) of the NPPF states that: "<i>Plans should ...f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).</i>" 	<p>No updates have been made to the supporting text nor the title of the policy.</p> <p>Criterion D has been deleted as suggested.</p> <p>Policy DM7 (Water Resources and Waste Water) of the Local Plan review requires all new residential developments (including replacement dwellings) to meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, using the Fittings Approach as set out in table 2.2 of the Building Regulations part G2.</p> <p>Such a requirement was included because West Berkshire lies within one of the driest parts of the country. A growing population and number of households within the District and its primary Water Resource Zone in the Kennet Valley, alongside growth within the neighbouring Thames Water resource zones, will place demand pressures on the sustainable supply of water.</p> <p>The amount of available water will be affected by climate change through changing weather patterns and more extreme weather events such as storms, floods and drought. In taking water from</p>

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			<p>rivers and aquifers, their value to the natural environment and people's enjoyment must not be compromised but improved and sustained.</p> <p>Most of the water is abstracted from groundwater aquifers supported by some river extraction, notably the Rivers Kennet and Lambourn. Most is to satisfy public water supply, but a significant proportion is supplied for private supply including agricultural land management, and electricity and industry. Thames Water supplies all of West Berkshire, and the area it serves is classified as being in a 'seriously water stressed' area in the Environment Agency Water Stressed Areas Classification 2021.</p> <p>Whilst policy DM7 is not strategic in nature, it is considered that all developments in West Berkshire district should implement the highest standards of water efficiency in order to place no additional pressure on water scarcity and quality in the river basin catchments of the Kennet and its tributaries and of the Thames and Chilterns South.</p> <p>It is therefore recommended that criterion (e) is deleted from the policy. There is no need for the criterion to amended to require an efficiency standard of 110 litres per head per day, because neighbourhood plan policies do not need to repeat local plan policies.</p>
Objective P (p.55)	Objective P (p.58)	<p><u>Archaeology Team:</u></p> <p>What exactly is meant by this? In the same way that an appendix of national and local heritage designations would be a useful addition to the NDP, we would have thought a</p>	No changes made. No further comments from the Archaeology Team.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		list of Special Areas of Conservation (nature), SSSIs and Local Wildlife Sites would help to establish what parts of the landscape around Hungerford are particularly important. There is often an overlap of historic and natural environment significance.	
Policy HUNG11 (p.57)	Policy HUNG11 (p.60)	<u>Development Management Team:</u> A – covered by other legislation how biodiversity net gain is to be delivered – how does that interact with this policy?	No comments received from the Development Management Team.
		<u>Ecology Team:</u> In general we support policy HUNG11 – Wildlife Friendly Development. However, point A does not align with mandatory BNG. Although the BNG hierarchy does prioritise delivery of BNG on-site, delivery on site as required by the policy is not mandatory but could be through a combination of on site or off-site enhancements and national credits. In addition, the planning practice guidance states that: Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework. It will also be inappropriate for plans or supplementary planning documents to include policies or guidance which are incompatible with this framework, for instance by applying biodiversity net gain to exempt categories of development or encouraging the use of a different biodiversity metric or biodiversity gain hierarchy. Paragraph: 006 Reference ID: 74-006-20240214	No comments received from the Ecology Team.
		<ul style="list-style-type: none"> It is unclear if there is any Parish-level evidence behind the policy. As part of the justification for policy CAP6 in the Cold Ash NDP, a diagram was included showing 	Changes made to policy as suggested. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>the nature conservation designations that exist within the Parish (eg. Sites of Special Scientific Interest, Local Wildlife Sites, Special Areas of Conservation) and highlighted that the community consider these spaces to be of importance.</p> <ul style="list-style-type: none"> • Policy HUNG11 comes across as very generic – there is no mention of Hungerford within the supporting text. • The preference is for onsite provision of biodiversity net gain however in certain cases it may be appropriate to provide offsite BNG as close to the development site as possible: <p><i>A. All Development proposals should aim to protect existing habitats and species, including hedgerows and mature trees <u>will be supported</u>. In particular, developments required to deliver measurable biodiversity net gain (a minimum of 10%) that propose the removal or reduction of existing habitats will be expected to deliver biodiversity net gain on site. <u>Where on-site provision of net gains is not possible off-site habitat improvements should be made as close to the proposed development as possible.</u></i></p>	
Chapter 10: Site Allocations			
Chapter heading (p.58)	Chapter heading (p.61)	<p>For clarity we suggest adding 'residential' to the chapter heading:</p> <p>10 RESIDENTIAL SITE ALLOCATIONS</p>	No changes made. We suggest for clarity that a minor modification is made to insert the word 'residential'.
Objective A (p.58)	Objective A (p.61)	<p>Amend the wording as follows for factual accuracy:</p> <p><i>Objective A: Allocate sites to meet the housing requirements in the West Berkshire Local Plan <u>Review</u> to 2041, where possible making best use of previously</i></p>	Change made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<i>developed land and minimising encroachment into the countryside.</i>	
Para 10.1, 1 st sentence (p.58)	Para 10.1, 1 st sentence (p.61)	<p>The following amendments are suggested for clarity and factual accuracy:</p> <p>10.1 The <u>Proposed Submission</u> West Berkshire Local Plan Review Submission Version (January 2023) <u>identified a housing requirement figure of</u> requires a minimum of 55 <u>dwelling</u>s. <u>These dwellings will</u> be delivered on <u>through residential allocated sites</u> site allocations within the Hungerford Neighbourhood Area over the plan period.</p>	<p>Since the comments were made on the pre-submission version of the NDP, The LPR has been adopted. We therefore suggest the following minor modification for factual accuracy:</p> <p>10.1 The West Berkshire Local Plan Review Submission Version (January 2023) <u>identified a housing requirement figure of</u> requires a minimum of 55 <u>dwelling</u>s. <u>These dwellings will</u> be delivered on <u>through residential allocated sites</u> site allocations within the Hungerford Neighbourhood Area over the plan period.</p>
Para 10.1, 2 nd sentence (p.58)	Para 10.1, 2 nd sentence (p.61)	<ul style="list-style-type: none"> For clarity, this paragraph should be amended to explain how the sites were selected and who selected them. As part of the Examination of the Local Plan Review, the Inspector issued an Action Point which required the Council to propose a modification that refers to the approximate numbers being indicative, with actual numbers being determined during the planning application process through detailed work and design in accordance with the policy parameters, having regard to the particular characteristics of the site and surroundings. In light of the above, we suggest that the paragraph is reworded as follows: <p><u>The process to determine which sites are selected for allocation has been</u> allocate these sites is expected to be undertaken by the HNP Steering Group and informed by consultation with the local community. <u>through the</u></p>	Changes made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>preparation of the Neighbourhood Plan. Accordingly, the following sites are allocated for residential development within the Neighbourhood Plan:</p> <ul style="list-style-type: none"> Land at Smitham Bridge Road – for a minimum of <u>approximately</u> 44 dwellings (Policy HUNG12). Land north of Cottrell Close – for a minimum of <u>approximately</u> 12 dwellings (Policy HUNG13). 	
New para after 10.1 (p.58)	New para after 10.1 (p.61)	<p>For clarity, a new paragraph is required to explain:</p> <ul style="list-style-type: none"> that each policy is accompanied by an indicative site plan; that the actual numbers will be determined <p><u>10.3 For each policy, the site allocation is identified on an indicative site map. The dwelling numbers are indicative, and actual numbers will be determined during the planning application process through detailed design work in accordance with the parameters set out in policies HUNG12 and HUNG13 and other relevant policies, having regard to the particular characteristics of the site and its surroundings.</u></p>	Changes made. No further comments.
Figure 10.1 (p.58)	Figure 10.1 (p.62)	<p>Figure 10.1 should be moved to after the policy box. It needs to be re-named 'indicative map' and should include the following information:</p> <ul style="list-style-type: none"> An arrow showing where the access will be taken from. The Public Right of Way which crosses the site – in the legend this should be called 'Public Right of Way to be retained'. The allocation boundary should be denoted by a red line. In the legend this should be called 'Site Boundary'. A legend. 	<p>Changes made, although the indicative plan has not been moved to after the policy box. Including the map after the policy and supporting text will provide clarity to the plan.</p> <p>A minor modification is required move the map to after the policy box to assist in the interpretation of the policy.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		For examples of indicative site plans that accompany a site allocation policy, have a look at the submission version of the Local Plan Review which can be viewed here (https://www.westberks.gov.uk/media/53945/Proposed-Submission-Regulation-19-West-Berkshire-Local-Plan-Review-to-2039-Clean-Version/pdf/LPR_2022-2039_Proposed_Submission_for_consultation_20_Jan_2023_for_web.pdf?m=638096652954630000).	
New sub-heading after heading 'Land at Smitham Bridge Road' (p.58)	n/a	For clarity, include a new sub-heading called 'Supporting Text'. <i>Land at Smitham Bridge Road</i> <i>Supporting Text</i>	No changes made. As mentioned above under the general comments section, a sub-heading should be included before the supporting text.
Paragraphs 10.2 to 10.6 (pp.58-59)	Paragraphs 10.2 to 10.13 (pp.61-63)	It is important to set out each planning policy so the intention is clear, and it can be shown the evidence base is robust. This will help ensure it meets the basic conditions. It will also be useful to future applicants and those determining the planning applications. Such text is often referred to as the 'supporting text' or 'reasoned justification'. The existing supporting text needs to be expended on and re-ordered so that it follows the policy. The following rows explain what needs to be added.	Changes made. No further comments.
Para 10.2 (p.58)	Para 10.4 (p.61)	This paragraph discusses screening, we recommend it is deleted and replaced with a new paragraph later on which covers the landscape in more detail, particularly as the site is located within a National Landscape.	The supporting text at paragraph 10.8 already covers the landscape. We recommend that this paragraph is deleted.
Move para 10.4 so that it is the first paragraph of the	Para 10.6 (p.62)	<ul style="list-style-type: none"> Moving the placing of the paragraph will mean it follows the ordering of the policy. 	Some changes made, however the final sentence still makes reference to construction traffic. As mentioned in our response to the Regulation 14 consultation, construction traffic is a matter dealt

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
supporting text (p.59)		<ul style="list-style-type: none"> • Rather than refer to 'vehicular access', we suggest referring to just 'access' as it will be used by pedestrians and cyclists to. • It needs to be explained how the access has been identified. • The impact of construction traffic is a matter that is dealt through conditions at the planning application stage. It is for the Local Highway Authority to identify whether such a condition would be required. <p>We suggest the following amendments are made:</p> <p>10.4 Vehicular access <u>Access to the site</u> will be on to <u>from</u> North Standen Road, and this has been identified through consultation with the Local Highway Authority. Pedestrian and cycle connections are required. North Standen Road <u>This is an identified gateway into the town (See Policy HUNG3), therefore it is expected that the gradual transition from countryside to town is not impacted by the proposed development. The site access will specifically need to be designed to appropriately reflect the North Standen Road gateway into the town. This should include a footway connection from the site to the existing footway heading eastwards from Pennyfarthing Close. During construction it is important to minimise the impacts of construction traffic along Church Street and Smitham Bridge Road.</u></p>	<p>with through planning conditions. The final sentence of the paragraph should be deleted:</p> <p><i>10.6 Access to the site will be from North Standen Road, with this having been identified through consultation with the Local Highway Authority. Pedestrian and cycle connections are required. North Standen Road is an identified gateway into the town (see Policy HUNG3), therefore it is expected that the gradual transition from countryside to town is not impacted by the proposed development. The site access will specifically need to be designed to appropriately respect the North Standen Road gateway into the town. This should include a footway connection from the site to the existing footway heading eastwards from Penny Farthing Close. During construction it is important to minimise the impacts of construction traffic along Church Street and Smitham Bridge Road.</i></p>
Para 10.5 (p.59)	Para 10.7 (p.62)	<ul style="list-style-type: none"> • The correct reference for the Public Right of Way (PRoW) is HUNG/46/1. • For context, additional text could be added in relation to where the PRoW provides linkages to. • The upgrading of Public Rights of Way is the responsibility of the local highway authority. We suggest reference to upgrades are removed. 	Changes made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>We suggest the following amendments are made:</p> <p><i>10.5 There is an existing Public Right of Way (HUNG/46/1) which must be retained along its current route on the eastern side of the site. <u>This provides linkages to Smitham Bridge Road and the countryside to the south of the site.</u> In order to provide safe pedestrian access into Hungerford town centre, this Public Right of Way should be upgraded so that it is capable of year-round use, including after dark by way of suitable lighting.</i></p>	
New para after 10.5 (p.60)	Para 10.8 (p.63)	<ul style="list-style-type: none"> The site is located within the North Wessex Downs National Landscape, and it is essential the supporting text provides some explanation of this and what the implications of the designation are. A Landscape Sensitivity Assessment for the site was prepared in 2011, and this concluded that the development would result in little harm to the National Landscape, provided specific protection and enhancement measures are included. These must be incorporated into the policy to ensure that the Basic Conditions are met, ie. have regard to paragraphs 182 of the NPPF and are in general conformity with policies ADPP5 and CS19 of the adopted Core Strategy and policies SP2 and SP8 of the Local Plan Review. <p>We suggest the following amendments are made:</p> <p><i><u>10.6 The site is located within the North Wessex Downs National Landscape (previously known as Area of Outstanding Natural Beauty). The primary purpose of National Landscape designation is to 'conserve and enhance the natural beauty of the area', and this is set out</u></i></p>	<p>Changes made to what is now paragraph 10.8, however the supporting text does not explain that the Exceptional Circumstances Test has been met. The Site Assessment Report also fails to cover the Exceptional Circumstances Test.</p> <p>Unless this can be demonstrated, then the policy is contrary to paragraph 183 of the NPPF, and it also fails to be in general conformity with the supporting text to paragraph 4.31 of policy SP2 of the LPR.</p> <p>The supporting text to Policy SP2 of the LPR at paragraph 4.31 states that:</p> <p><i>"The exceptional circumstances necessary to justify the allocation of any sites for major development within NDPs will be expected to be demonstrated through individual neighbourhood plans. Proposals that meet the requirements of the relevant site allocation policy in the neighbourhood plan, along with other relevant policies in the development plan, will be deemed to be in accordance with the</i></p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p><u><i>within the Countryside and Rights of Way Act 2004. 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. The recommendations of the LSA have been incorporated into the policy. Development will also be further informed by a Landscape and Visual Impact Assessment.</i></u></p> <p>In addition to this, the supporting text needs to be updated to set out the Exceptional Circumstances Test for major development within the National Landscape (alternatively this could be included within an Appendix to the NDP or within the site selection paper). The is required to ensure the Plan complies with paragraph 183 of the NPPF which states that:</p> <p><i>“...permission should be refused for major development in the AONB [National Landscape] other than in exceptional circumstances, where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:</i></p> <ul style="list-style-type: none"> <i>(a) 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;</i> <i>(b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and</i> <i>(c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”</i> 	<p><i>development plan and consistent with national policy.”</i></p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>The NPPF defines major residential development as development where 10 or more homes will be provided, or the site area has an area of 0.5ha or more.</p> <p>To assist in preparing the text, we suggest you have a look at chapter 5 of the Council's Housing Background Paper (https://www.westberks.gov.uk/media/54001/Housing-Background-Paper-January-2023/pdf/Housing_Background_Paper_January_2023.pdf?m=638102336216470000) which forms part of the evidence base for the Local Plan Review.</p>	
New para (p.59)	n/a	Some text needs to be included about the design policy parameter	No changes made. To provide context to criterion (c) of the policy, it would have been helpful for the Town Council to have provided some text.
New para (p.59)	n/a	Some text needs to be included about the open space policy parameter	No change made. See comments below in respect of parameter (l).
Para 10.3 (p.58)	Paras 10.9-10.11	<ul style="list-style-type: none"> The exact location of SuDS and open space will be informed through the detailed design work as part of the planning application process. To assist in the justification of the policy, additional information is required about the type of flood risk on the site and highlight. Because there is a risk of flooding on part of the site, a Flood Risk Assessment will be required at the planning application stage. <p>We suggest that the following amendments are included:</p> <p>10.3 <u>10.9 The Shalbourne Brook (Main River), a tributary of the River Dun, flows north eastwards very close to the eastern boundary of the site. The Shalbourne Brook is a chalk river, which is a protected habitat listed in S41 of the NERC Act. Due to the presence of a stream bordering the</u></p>	<p>Changes made.</p> <p>The Environment Agency published a revised Flood Map for Planning in March 2025, and this shows that the fluvial flood risk on the eastern site boundary has increased slightly. We therefore suggest amending paragraph 10 to reflect this:</p> <p><i>10.9 The Shalbourne Brook (Main River), a tributary of the River Dun, flows north eastwards very close to the eastern boundary of the site. The Shalbourne Brook is a chalk river, which is a protected habitat listed in S41 of the NERC Act. A very small part of the eastern boundary of the site is at risk of fluvial flooding from the Shalbourne Brook during a 1 in 100-year flood event, with a small increase in the</i></p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>east side of the site, there is a high risk flooding along the eastern part of the site. Development should not be proposed in this area which offers a good opportunity to provide for Sustainable Drainage Systems (SuDS) and public open space. A very small part of the eastern boundary of the site is at risk of fluvial flooding from the Shalbourne Brook during a 1 in 100 year flood event, with a small increase in the flood extent during a 1 in 1000 year flood event. The remainder of the site is within Flood Zone 1 and therefore is at low fluvial flood risk.</p> <p><u>10.10 Surface water flood risk at the site follows the route of the Shalbourne Brook, with a flow path draining in a north westerly direction along the eastern-most part of the site during a 1 in 30 year and greater rainfall events.</u></p> <p><u>10.11 Development must be avoided within the areas at risk of flooding, and a Flood Risk Assessment must accompany any future planning application. Further information on Flood Risk Assessment is set out within the Council's Level 1 Strategic Flood Risk Assessment, and within the supporting text to policy SP6 of the West Berkshire Local Plan Review.</u></p>	<p>flood extent during a 1 in 1000 year flood event <u>is situated within Flood Zones 2 and 3 where there is a medium and high risk of flooding.</u> The remainder of the site is within Flood Zone 1 and therefore is at low fluvial flood risk.</p>
New para (p.59)	Para 10.13 (p.63)	<ul style="list-style-type: none"> One of the policy parameters is for ecological surveys, and it needs to be explained why this is the case. <p>We suggest the inclusion of the following text:</p> <p><u>10.12 A desk top assessment of the site by the Thames Valley Environment Research Centre, which helped inform the preparation of WBDC's Housing and Economic Land Availability Assessment, identifies that development has a medium risk of adverse nature conservation impacts. Therefore, an appropriate Ecological Impact Assessment</u></p>	Changes made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<i><u>(EclA) will need to inform development. The EclA will ensure that any designated sites and/or protected habitats and/or species are not adversely affected.</u></i>	
Para 10.6 (p.59)	Para 10.5 (p.62)	<ul style="list-style-type: none"> The number of dwellings is included at the start of the chapter. We recommend that this paragraph is deleted. 	Changes made. No further comments.
	Policy HUNG12 (p.59)		<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We note this policy, relating to the proposed 44nr dwellings for this identified site. This abuts the current alignment for the established National Cycle Network route 4 (https://www.sustrans.org.uk/find-a-route-on-the-national-cycle-network/route-4/).</p> <p>We agree with the aspiration in 10.6 for inclusion of a footway connection from the site to the existing footway heading east from Pennyfarthing Close, and for the need to mitigate impacts associated with future construction traffic. Provision of lighting on PROW HUNG/46 may be more challenging to implement and maintain.</p> <p>We advocate seeking provision of sufficient secure cycle parking for residents and visitors plus EVCPs provision in accordance with Part S of the Building Regulations as part of any development.</p>
Policy HUNG 12, first para (p.59)	Policy HUNG 12, first para (p.59)	<p>For clarity, we suggest that the following modifications are made:</p> <p><i><u>The site, as shown on the indicative map, will be required to be developed in accordance with the following parameters:</u></i></p> <p>Land at Smitham Bridge Road (approximately 2.78</p>	<p>No changes made. For clarity, the minor modification suggested at Reg 14 should be made, ie.:</p> <p><i><u>The site, as shown on the indicative map, will be required to be developed in accordance with the</u></i></p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		hectares as identified on the Policies Map and in Figure 10.1) is allocated for a minimum of 44 dwellings and development proposals will be supported subject to the following criteria:	following parameters: Land at Smitham Bridge Road (approximately 2.78 hectares as identified on the Policies Map and in Figure 10.1) is allocated for a minimum of 44 dwellings and development proposals will be supported subject to the following criteria:
Policy HUNG12, new parameter (p.59)	Policy HUNG12, criterion a (p.63)	The number of dwellings should be included within the parameters: x. The provision of approximately x dwellings;	Changes made. No further comments.
Policy HUNG12, parameter (a) (p.59)	Policy HUNG12, criterion (b) (p.59)	When determining development proposals, the development plan must be read as a whole. There is no need to cross-refer to other policies in the development plan, and we recommend deleting parameter (a).	No changes made. Comments remain, and parameter (b) should be deleted.
Policy HUNG12, parameter (b) (p.59)	n/a	Affordable housing requirements are set out within policy CS6 of the Core Strategy and policy SP19 of the Local Plan Review (which is currently at examination). When determining development proposals, the development plan must be read as a whole. We recommend that parameter (b) is deleted.	Criterion deleted. No further comments.
Policy HUNG12, parameters (e) and (f) (p.59)	Policy HUNG12, parameters (h) and (i) (p.64)	<ul style="list-style-type: none"> We suggest moving parameter (e) towards the start of the policy as it is a key aspect of the policy. We suggest that parameter (f) is incorporated into (e) so that access is covered as one. Rather than refer to 'vehicular access', we suggest referring to just 'access' as it will be used by pedestrians and cyclists to. <p>We suggest the following amendments are made:</p> <p>eb. Access to the site will be provided from The provision of appropriate vehicular access into the site from North Standen Road. This should reflect the role of North Standen</p>	Changes made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<i>Road as a gateway to the town. f. A footway will need to be provided from the development to the existing footway on North Standen Road (east of Penny Farthing Close).</i>	
Policy HUNG12, new parameter (p.59)	Policy HUNG12, parameter (j) (p.64)	The Local Highway Authority has advised that a Transport Statement will be required at the planning application stage. The following new parameter should be added: <i>c. A Transport Statement will be required as part of any planning application;</i>	Change not made. Comment remains.
Policy HUNG12, parameter (d) (p.59)	Policy HUNG12, parameter (d) (p.59)	<ul style="list-style-type: none"> The correct reference for the PRoW is HUNG/46/1. The policy should seek the protection of the PRoW. The responsibility of upgrades lie with the local highway authority. <p>We suggest the following amendments are made:</p> <p><i>d. The existing Public Right of Way (HUNG/46/1) which runs through the site must be retained; The upgrading of Public Right of Way HUNG46 so that it is capable of everyday use all year round and has suitable lighting for use after dark. Such lighting must be designed to protect the amenity of neighbouring residents.</i></p>	Change made. No further comments.
Policy HUNG12, new parameter (p.59)	Policy HUNG12, parameter (e) (p.64)	<p>A Landscape Sensitivity Assessment for the site was prepared in 2011, and this concluded that the development would result in little harm to the National Landscape, provided specific protection and enhancement measures are included. These measures need to be included within the policy parameters:</p> <p><i>e. The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011) and will include the protection and enhancement of the following features:</i></p>	<p>Change made.</p> <p>The SEA Environmental Report at paragraph 10.12 recommends that the site allocation policies be revised to reference the need for consideration to be given to the North Wessex Downs Natural Landscape and its Management Plan.</p> <p>Whilst the criteria makes reference to the National Landscape, it does refer to the Management Plan. Additional wording should be included to the</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>i. <u>the hedgerow along North Standen Road; and</u></p> <p>ii. <u>views from the west through ensuring that no roof tops are visible over the hedgerow;</u></p>	<p>criterion as follows to comply with the recommendations of the SEA:</p> <p>e. <i>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011) and will include the protection and enhancement of the following features:</i></p> <p>i. <i>the hedgerow along North Standen Road; and</i></p> <p>ii. <i>views from the west through ensuring that no roof tops are visible over the hedgerow;</i></p> <p><u>Regard must be given to the North Wessex Downs National Landscape Management Plan.</u></p>
Policy HUNG12, new parameter (p.59)	Policy HUNG12, parameter (f) (p.64)	<p>Due to the sites location within the National Landscape, development proposals will also need to be accompanied by a Landscape and Visual Impact Assessment. The following new parameter needs to be added:</p> <p><u>f. The development design and layout will be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA);</u></p>	Change made. No further comments.
	Policy HUNG12, parameter (g) (p.64)		<p><u>Rights of Way Team:</u></p> <p>Development should respect the rural character of HUNG/46/1. The development design should respect the current contact of this Rights of Way as an access point to the town, and respect the open nature of this route as it currently is.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
Policy HUNG12, parameter (g) (p.59)	Policy HUNG12, parameter (k) (p.64)	A construction traffic management plan would be secured by planning condition and included at the request of the Council's Highways Team. Criterion (g) should be deleted.	Change not made. Comments made at the Regulation 14 stage remain.
	Policy HUNG12, parameter (l) (p.64)		<p>This provision requires high quality open space, yet provides no further detail, for example on standards.</p> <p>Policy DM40 of the LPR sets out the requirements for the provision of public open space in new developments that comprise 10 dwellings or more. This policy, which is not strategic, sets out detailed parameters. The Council suggest that reference is made to the policy in criterion (l) as follows:</p> <p>l. The provision of high quality public open space <u>in accordance with policy DM44 of the West Berkshire Local Plan Review</u>.</p>
Policy HUNG12, parameter (i) (p.59)	Policy HUNG12, parameter (m) (p.64)	<p>We suggest rewording as follows to make clear that a sequential approach to the location of development is taken and that the requirement for a Flood Risk Assessment and Surface Water Drainage Strategy are included:</p> <p><i>i. <u>A Flood Risk Assessment (FRA) will be required due to a small part of the eastern site boundary falling within Flood Zones 2 and 3, and because of the risk of surface water flooding on the eastern part of the site. Development must be located away from these areas at high risk of surface water flooding. A Surface Water Drainage Strategy will also be required. The FRA and Surface Water Drainage Strategy should demonstrate wider betterment by demonstrating measures which can be put in place to contribute to a reduction in flood risk downstream.</u></i></p>	Change made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
Policy HUNG12, parameter (j) (p.59)	n/a	<p>Paragraph 16 (f) of the NPPF states that:</p> <p><i>‘Plans should ...f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)’.</i></p> <p>Policy CS16 of the Core Strategy and SP6 of the Local Plan Review require SuDS in all new developments. Criterion (k) should be deleted.</p>	Change made. No further comments.
Policy HUNG12, parameter (k) (p.59)	Policy HUNG12, parameter (n) (p.64)	<p>The securing of play facilities is achieved through the Community Infrastructure Levy or Section 106. It would not be secured by planning permission, unless it is land or equipment ‘gifted’ by the developer.</p> <p>Recommend deleting this parameter.</p>	Change not made. Previous comments remain – this parameter should be deleted.
Policy HUNG12, parameter (l) (p.59)	Policy HUNG12, parameter (o) (p.64)	<p>As part of the preparation of the Local Plan Review, the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) advised WBDC that the correct type of study that needs to be referred to is an Ecological Impact Assessment.</p> <p>The Council’s Ecology Team have commented that they have no specific comments on the allocation, and there are no overriding ecological designations that would prevent allocation. They support the requirement of ecological information to accompany any future application, and they recommend that criterion (l) is broadened to include ‘protected habitats and species’ and that the full mitigation hierarchy is referenced ‘...can be adequately avoided, mitigated and / or compensated for’.</p> <p>The criterion (l) should be amended as follows:</p>	<p>Change made, however to ensure consistency with the other parameters, we suggest the following wording is used:</p> <p><i>o. The scheme must <u>will</u> be informed by an Ecological Impact Assessment (EcIA)...</i></p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<i>1. <u>The scheme will be informed by an Ecological Impact Assessment (EclA)</u> Ecological surveys are undertaken which are <u>must be</u> able to demonstrate that the presence of any protected <u>habitats and</u> species on the site can be adequately mitigated <u>and / or compensated for</u>.</i>	
Policy HUNG12 (p.59)	Policy HUNG12 (p.64)	<p><u>Archaeology Team:</u></p> <p>We did not think that any below ground archaeological investigation was needed here.</p> <p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We note this policy, relating to the proposed 44 dwellings for this identified site. This abuts the current alignment for the established National Cycle Network route 4. We agree with the aspiration in 10.4 for inclusion of a footway connection from the site to the existing footway heading east from Penny Farthing Close, and for the need to mitigate impacts associated with future construction traffic. Provision of lighting on PROW HUNG/46 may be more challenging to implement and maintain. We advocate seeking provision of sufficient secure cycle parking for residents and visitors plus Electric Vehicle Charging Point provision in accordance with Part S of the Building Regulations as part of any development.</p>	<p>In light of the comments made by the Council's Archaeology Team at the Regulation 14 stage, it is recommended that criterion q is deleted.</p> <p>No further comments received from the Sustainable Travel Team & Transport Policy Team.</p>
Para 10.7 (p.60)	Para 10.7 (p.60)	<p>Figure 10.2 should be moved to after the policy box. It needs to be re-named 'indicative map' and should include the following information:</p> <ul style="list-style-type: none"> • A legend. • An arrow showing where the access will be taken from. • The allocation boundary should be denoted by a red line. In the legend this should be called 'Site Boundary'. 	<p>Changes made, although the indicative plan has not been moved to after the policy box. Including the map after the policy and supporting text will provide clarity to the plan.</p> <p>A minor modification is required to move the map to after the policy box to assist in the interpretation of the policy.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		For examples of indicative site plans that accompany a site allocation policy, have a look at the submission version of the Local Plan Review which can be viewed here (https://www.westberks.gov.uk/media/53945/Proposed-Submission-Regulation-19-West-Berkshire-Local-Plan-Review-to-2039-Clean-Version/pdf/LPR_2022-2039_Proposed_Submission_for_consultation_20_Jan_2023_for_web.pdf?m=638096652954630000).	
New para after 10.7 (p.60)	n/a	<p>In light of the sites location within the National Landscape, it is important that this is reflected within the supporting text particularly as a new parameter needs to be added to the policy to reflect the recommendations of a Landscape Sensitivity Assessment.</p> <p>The supporting text needs to be updated to set out the Exceptional Circumstances Test for major development within the National Landscape (alternatively this could be included within an Appendix to the NDP or within the site selection paper). This required to ensure the Plan complies with paragraph 183 of the NPPF which states that:</p> <p><i>“...permission should be refused for major development in the AONB [National Landscape] other than in exceptional circumstances, where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:</i></p> <ul style="list-style-type: none"> <i>(a) 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;</i> <i>(b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and</i> 	<p>Changes made to what is now paragraph 10.8, however the supporting text does not explain that the Exceptional Circumstances Test has been met. The Site Assessment Report which accompanies the Plan also fails to cover the Exceptional Circumstances Test. This is contrary to para 183 of the NPPF.</p> <p>Paragraph 4.31 of the LPR as modified states that:</p> <p><i>“The exceptional circumstances necessary to justify the allocation of any sites for major development within NDPs will be expected to be demonstrated through individual neighbourhood plans. Proposals that meet the requirements of the relevant site allocation policy in the neighbourhood plan, along with other relevant policies in the development plan, will be deemed to be in accordance with the development plan and consistent with national policy.”</i></p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p><i>(c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”</i></p> <p>The NPPF defines major residential development as development where 10 or more homes will be provided, or the site area has an area of 0.5ha or more.</p> <p>To assist in preparing the text, we suggest you have a look at chapter 5 of the Council's Housing Background Paper (https://www.westberks.gov.uk/media/54001/Housing-Background-Paper-January-2023/pdf/Housing_Background_Paper_January_2023.pdf?m=638102336216470000) which forms part of the evidence base for the Local Plan Review.</p>	
Para 10.9 (p.60)	Para 10.15 (p.65)	Cover off development capacity at the start – see comments above.	Change made. No further comments.
New para after 10.9	Para 10.17 (pp.65-66)	<p>Para 10.7 currently mentions the proximity of a Grade II Listed building. We suggest that this is instead covered within a new para after 10.9. Reference also needs to be made to the nearby Hungerford Conservation Area.</p> <p>It could also mention that development proposals will need to be accompanied by a Heritage Impact Assessment, and the need for Archaeological assessment.</p> <p>The para could be worded as follows:</p> <p><i><u>To the west of the site lies a Grade II Listed building (The Hermitage) as well as the Eddington Conservation Area. The development design and layout will need to be informed by a Heritage Impact Assessment. Following advice from WBDC's Archaeology Team, an archaeological desk-based assessment, and potentially further site</u></i></p>	Change made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<u><i>evaluation is required to determine the archaeological significance of the site.</i></u>	
New para after 10.9	Para 10.18 (p.66)	One of the policy parameters is for ecological surveys, and it needs to be explained why this is the case. You could add the following: <u><i>A requirement for an Ecological Impact Assessment has been included to increase emphasis on the requirement of national policy and legislation to mitigate for effects on habitats.</i></u>	Change made. No further comments.
Paragraph before the policy parameters (p.61)	Paragraph before the policy parameters (p.66)	See comment above about the development potential for the site	Change made. No further comments.
	Policy HUNG13 (p.66)		<u><i>Sustainable Travel Team & Transport Policy Team:</i></u> We note this policy, relating to the proposed 12 or more dwellings for this identified site. Development on this site could represent an opportunity to secure monies to further improve the gateway on the A4 at this end of Hungerford, in addition to creating and improving walking routes. Again, we advocate seeking provision of sufficient secure cycle parking for residents and visitors plus EVCPs provision in accordance with Part S of the Building Regulations as part of any development.
Policy HUNG13, criterion (b) (p.61)	n/a	Affordable housing requirements are set out within policy CS6 of the Core Strategy and policy SP19 of the Local Plan Review (which is currently at examination). When determining development proposals, the development plan must be read as a whole. Criterion (b) should therefore be deleted.	Change made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
Policy HUNG13, criterion (c) (p.61)	Policy HUNG13, criteria (d) and (e) (p.66)	<p>The protection and enhancement measures identified within the 2011 Landscape Sensitivity Assessment (LSA) need to be incorporated into criterion (c). In addition, If the LSA concludes that development is acceptable subject to specific protection and enhancement measures, then these measures need to be included within the policy:</p> <p><u><i>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011) and will include the following protection and enhancement measures:</i></u></p> <ul style="list-style-type: none"> <i>i. The retention of the mature planting around the site and provision for tree planting internally;</i> <i>ii. Provision of soft edge on the eastern boundary; and</i> <i>iii. Careful design to reflect the site's semi-rural location.</i> <p><u><i>The development design and layout will be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA).</i></u></p>	<p>Change made.</p> <p>The SEA Environmental Report at paragraph 10.12 recommends that the site allocation policies be revised to reference the need for consideration to be given to the North Wessex Downs Natural Landscape and its Management Plan.</p> <p>Additional wording should be included to criterion (d) as follows to comply with the recommendations of the SEA:</p> <p><i>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011) and will include the following protection and enhancement measures:</i></p> <ul style="list-style-type: none"> <i>i. The retention of the mature planting around the site and provision for tree planting internally;</i> <i>ii. Provision of soft edge on the eastern boundary; and</i> <i>iii. Careful design to reflect the site's semi-rural location.</i> <p><u><i>Regard must be given to the North Wessex Downs National Landscape Management Plan.</i></u></p>
Policy HUNG13, criterion (d) (p.61)	Policy HUNG13, criterion (g) (p.66)	<p>Criterion (d) should be reworded for clarity.</p> <p><u><i>Access to the site will be provided from Cottrell Close</i></u> The provision of appropriate vehicular access into the site from Cottrell Close and appropriate pedestrian access from the site to Cottrell Close <u><i>with footpaths provided to connect the site to existing footways.</i></u></p>	Change made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
Policy HUNG13, criterion (e) (p.61)	Policy HUNG13, criterion (h) (p.66)	Construction Traffic Management Plans are included as conditions to a planning application. This criterion should be removed. e. Provision of a Construction Traffic Management plan to help minimise construction traffic impacts through Cottrell Close.	Change not made. Previous comments remain.
Policy HUNG13, criterion (f) (p.61)	Policy HUNG13, criterion (i) (p.66)	No justification has been included to explain why a pedestrian connection is required into the neighbouring cemetery. Is the cemetery within the same land ownership? If not, does the landowner support a pedestrian access into the site? We note that there is no Public Right of Way that runs through the cemetery. Financial contributions are a matter for the S106 agreement and not the policy parameters.	The criterion remains in the policy and previous comments remain.
Policy HUNG13, criterion (g) (p.61)	n/a	Paragraph 16 (f) of the NPPF states that: <i>'Plans should ...f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).'</i> Policy CS16 of the Core Strategy and SP6 of the Local Plan Review require SuDS in all new developments. Criterion (g) should be deleted.	Change made. No further comments.
Policy HUNG13, criterion (h) (p.61)	Policy HUNG13, criterion j) (p.66)	Criterion (h) needs to be expanded to take account of the nearby Hungerford Conservation Area and amended to include the requirement for a Heritage Impact Assessment. h. The setting of the grade II listed building to the west of the site and the Hungerford Conservation Area is preserved. <i>A Development will be informed by a Heritage</i>	Change made. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments				
		<u>Impact Assessment due to the proximity of the Hungerford Conservation Area and a Grade II Listed Building.</u>					
Policy HUNG13 New criterion after (h) (p.61)	Policy HUNG13 New criterion after (k) (p.69)	<p>The Council’s Archaeology Team have advised that an archaeological desk-based assessment is needed as a first step if developing the land, due to the potential in the wider area. A new criterion therefore needs to be added to the policy as follows:</p> <p><u>x) Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site</u></p>	<p>Change made.</p> <p>Archaeology Team:</p> <p>The Site Assessment spreadsheet contained in Appendix A has not been updated to refer to the need for archaeological work. For completeness, could the following be added into the Stage 2b sheet:</p> <table><tr><td>WOULD DEVELOPMENT HARM UNDESIGNATED HERITAGE ASSETS?</td><td>Archaeological Recommendation</td></tr><tr><td>Potential harm to setting of former St Saviour’s Church, an unlisted 19th century church converted into a house. SHOULD ADD IN - Greenfield site with no record of any previous archaeological investigations. Some potential due to surrounding area</td><td>Desk-based Assessment to better understand archaeological potential and survival.</td></tr></table>	WOULD DEVELOPMENT HARM UNDESIGNATED HERITAGE ASSETS?	Archaeological Recommendation	Potential harm to setting of former St Saviour’s Church, an unlisted 19th century church converted into a house. SHOULD ADD IN - Greenfield site with no record of any previous archaeological investigations. Some potential due to surrounding area	Desk-based Assessment to better understand archaeological potential and survival.
WOULD DEVELOPMENT HARM UNDESIGNATED HERITAGE ASSETS?	Archaeological Recommendation						
Potential harm to setting of former St Saviour’s Church, an unlisted 19th century church converted into a house. SHOULD ADD IN - Greenfield site with no record of any previous archaeological investigations. Some potential due to surrounding area	Desk-based Assessment to better understand archaeological potential and survival.						

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
Policy HUNG13 criterion (i) (p.61)	Policy HUNG13 criterion (l) (p.69)	<p>As part of the preparation of the Local Plan Review, BBOWT advised WBDC that the correct type of study that needs to be referred to is an Ecological Impact Assessment.</p> <p>The Council's Ecology Team have commented that they have no specific comments on the allocation, and there are no overriding ecological designations that would prevent allocation. They support the requirement of ecological information to accompany any future application, and they recommend that criterion (l) is broadened to include 'protected habitats and species' and that the full mitigation hierarchy is referenced '...can be adequately avoided, mitigated and / or compensated for'.</p> <p>The criterion (l) should be amended as follows:</p> <p><i>i. <u>The scheme will be informed by an Ecological Impact Assessment (EcIA) Ecological surveys are undertaken which are must be able to demonstrate that the presence of any protected habitats and species on the site can be adequately mitigated and / or compensated for.</u></i></p>	Change made. No further comments.
Policy HUNG13 New criterion after (i) (p.61)	Policy HUNG13 New criterion after (m) (p.69)	<p>The site is in close proximity to the Kennet and Lambourn Floodplain Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), although separated by existing development and the A4. HRA screening will need to be undertaken at the planning application stage to ascertain the impact of development upon the SAC. The following new criterion needs to be added to the policy to reflect this:</p> <p><i>(x) <u>Development on the site will not adversely affect the SSSI and SAC which are in close proximity to the south of</u></i></p>	Change made in part; however, no reference is made to development not adversely affecting the SSSI and SAC. This reference needs to be included.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<i><u>the site. A Habitat Regulations Assessment will be required to accompany any future planning application.</u></i>	
Policy HUNG13 (p.61)	Policy HUNG13 (p.69)	<p><u>Sustainable Travel Team & Transport Policy Team:</u></p> <p>We note this policy, relating to the proposed 12nr or more dwellings for this identified site. Development on this site could represent an opportunity to secure monies to further improve the gateway on the A4 at this end of Hungerford, in addition to creating and improving walking routes. Again, we advocate seeking provision of sufficient secure cycle parking for residents and visitors plus EVCPs provision in accordance with Part S of the Building Regulations as part of any development.</p>	No further comments from the Sustainable Travel Team & Transport Policy Team.
New chapter called Monitoring and Review after chapter 11	Paragraphs 1.14 and 1.25, p.4	<p>As mentioned above, the monitoring chapter is generally included as the final chapter in Local Plans and neighbourhood plans. The Town Council may wish to move para 1.10 into a new chapter.</p> <p>It might also be helpful to include some additional text on why a Qualifying Body may wish to undertake a review.</p> <p>Some suggested text is included below, however you may wish to develop this further. Locality has prepared some guidance on how to monitor and review a neighbourhood plan: https://neighbourhoodplanning.org/toolkits-and-guidance/how-to-implement-monitor-and-review-your-made-neighbourhood-plan/.</p> <p><u>Monitoring and Review</u></p> <p><i><u>It is not a legislative requirement to monitor, review, and update a neighbourhood plan. However, neighbourhood plans like all planning policy documents benefit from being reviewed and revised from time-to-time, to reflect changing</u></i></p>	Additional text now included. No further comments.

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p><u>contexts and changing needs or issues around effectiveness.</u></p> <p><i>Hungerford Town Council, as the responsible <u>qualifying</u> body, will be responsible for maintaining and periodically revisiting the Plan to ensure relevance and to monitor delivery.</i></p>	
Site allocation evidence		<p>General comments:</p> <ul style="list-style-type: none"> Currently the background evidence is contained within several documents. It would be helpful if this could be pulled together into one document. The indicative development potential given in policy HUNG12 is different to the development potential calculated in the HELAA. The HELAA used the West Berkshire Pattern Book Study (https://www.westberks.gov.uk/media/48472/West-Berkshire-Density-Pattern-Book-September-2019/pdf/West-Berkshire-Density-Pattern-Book-September-2019.pdf?m=1707725638817=638102336216470000), and for site HUNG12 this comes out as 31 dwellings. There needs to be an explanation within the site selection work of how the development potential of 44 dwellings has been derived. It also needs to be explained how the development potential for HUNG13 has been derived. 	<p>There is now one Site Assessment Report, with two accompanying appendices.</p> <p>There continues to be no explanation of how the development potentials have been derived.</p> <p>As explained in the comments made to the pre-submission consultation, the HELAA used the West Berkshire Pattern Book Study to determine the development potential of site HUNG12 (and the other sites promoted for consideration within the HELAA).</p> <p>The Study concludes that for West Berkshire, the most appropriate approach to categorisation should be based on location, given the highly diverse nature of settlement and rural character areas with the district.</p> <p>The starting point for the calculation of the development potential is the whole (gross) site area. To this, a developable area percentage has been applied which varies depending upon the size of the site and the proximity of the site to the built up area. A standard density for the edge of village / settlement in AONB has been used (20dph).</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
			It should be noted that if the site promoter has suggested a development potential that is lower than that calculated via the Density Pattern Book, this has been used. If the potential suggested is higher, then the density pattern book has been used.
Hungerford Neighbourhood Plan Site Assessment Report	Hungerford Neighbourhood Plan Site Assessment Report	<p>We suggest updating the report to provide greater clarity of the process undertaken:</p> <ul style="list-style-type: none"> An explanation is required to explain who undertook the site selection work. Did those involved declare any interests and also avoid assessing sites that they may have an interest in, eg. living or owning a property in close proximity to the site? Make this clear. Chapter 2: Approach: we suggest including a new stage that will become Stage 1 which considers the identification of sites. Within this it would be helpful to clearly distinguish between those sites promoted to WBDC, and those to HNPSG. It would also be helpful if some text is included as to why Hungerford chose to undertake their own call for sites. Some suggested text is included below: <p><u>Stage 1: Identification of sites</u></p> <p><u>West Berkshire District Council:</u></p> <p><u>West Berkshire District Council (WBDC) publicised a formal 'call for sites' between 23 December 2016 and 31 March 2017. The individuals and organisations on the Planning Policy Consultation Database were notified of the 'call for sites', and it was also advertised on the Council's website.</u></p>	<p>Suggested changes made. However, it is still unclear whether those involved declared any interests, and if there were, whether they avoided assessing sites they had an interest in.</p> <p>Para 3.13 of the report states that the potential sites were presented to the local community. Although this is set out within the Consultation Statement, it would have been helpful if this was also included in the Site Assessment Report.</p> <p>The Site Assessment Report makes no reference to the SEA, yet paragraph 10.2 of the NDP states that the process of identifying, assessing and selection of sites is explained in the SEA Environmental Report. For clarity, it would have been helpful for the Site Assessment Work to cross refer to the conclusions of the SEA.</p>

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p><u>In response to numerous requests, the Council continued to accept sites for a further year. In addition, the Council re-opened the 'call for sites' during the Regulation 18 consultation on the West Berkshire Local Plan Review which ran from 9 November until 21 December 2018.</u></p> <p><u>In total, 19 sites were promoted within Hungerford Parish. However, four sites (HUN1, HUN2, HUN3, and HUN13) have since been withdrawn by the site promoters:</u></p> <ul style="list-style-type: none"> <u>HUN3: Former Oakes Brother site</u> <u>HUN4: 15 Chestnut Walk</u> <u>HUN5: Land at Priory Road</u> <u>HUN6: Smitham Bridge Industrial Estate</u> <u>HUN7: Shalbourne River</u> <u>HUN8: Adjacent to Penny Farthing Close</u> <u>HUN9: Land off Smitham Bridge Road and Marsh Lane</u> <u>HUN10: Adjacent to Church</u> <u>HUN11: 4 Bath Road</u> <u>HUN12: Land west of Salisbury Road</u> <u>HUN14: Land east of Salisbury Road</u> <u>HUN15: Follydog Field</u> <u>HUN16: King Field (all)</u> <u>HUN17: King Field (part)</u> <u>HUN18: The Paddock, Marsh Lane</u> <u>HUN19: Land at Strongrove Hill</u> <p><u>Hungerford Neighbourhood Plan Steering Group:</u></p>	

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p><u>Separate to WBDC's 'call for sites', HUNPSG undertook its own 'call for sites' in September 2018. This was because >>>. As part of this process, it wrote to all the main landowners in the parish. Most of the sites promoted had also been promoted to WBDC through its own 'call for sites' between 2017 and 2018, however three new sites were promoted – HUN15, HUN16, and HUN17. It should be noted that these three sites were later promoted to WBDC.</u></p> <p><u>For various reasons unrelated to the site assessment process, there was a delay in taking forward site options through the HNP. The result was that in November and December 2022, a second Call for Sites was undertaken by the HNP. In total 11 sites were promoted for consideration, including one site (HUN19) that was subsequently been submitted to WBC. The new sites promoted were as follows:</u></p> <ul style="list-style-type: none"> • HUN20: North of Cottrell Close • HUN21: River Field • HUN22: Ramsbury Estate – north of A4 • HUN23: Ramsbury Estate – south of A4 • HUN24: East of Inkpen Road • HUN25: West of Inkpen Road • HUN26: Marsh Lane (triangle) • HUN27: Dobbies Garden Centre • HUN28: Stirland Garage 	

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<ul style="list-style-type: none"> Within stage 2 (previously stage 1), distinguish between the West Berkshire HELAA and the site the site assessments prepared by the Steering Group in a similar way to the HELAA. Some suggested text is included below: <u>Stage 2: Housing and Economic Land Availability Assessment (HELAA)</u> <i>The sites identified by WBDC within Stage 1 above were assessed within the HELAA. The HELAA primarily forms part of the evidence base for the Local Plan Review, however it can also form part of the evidence for neighbourhood plans being prepared within West Berkshire district.</i> <i>The purpose of the HELAA is to assist in identifying suitable land which is available for development for different land uses, the development potential, and when development is likely to occur. The inclusion of sites within the HELAA does not in itself determine that it is suitable for development, or that the land is available for development.</i> <i>The HELAA was first published in February 2020, and an update published in December 2020 to coincide with the consultation on the emerging draft (Regulation 18) West Berkshire Local Plan Review. A third update was published in January 2023 to coincide with the consultation on the proposed submission</i> 	

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p><u><i>(Regulation 19) West Berkshire Local Plan Review.</i></u></p> <p><u><i>The HELAA has been prepared in accordance with the joint HELAA methodology [https://www.westberks.gov.uk/helaa] that was developed and prepared with four other Berkshire authorities – Reading Borough Council, the Royal Borough of Windsor and Maidenhead, Slough Borough Council, and Wokingham Borough Council. The methodology is based on, and complies with, the standard methodology in Planning Practice Guidance.</i></u></p> <p><u><i>Assessment of promoted sites by HNPSG:</i></u></p> <p><u><i>Sites which were promoted to HNPSG were subject to assessment by a planning consultant on behalf of HNPSG. To ensure a consistent approach with the HELAA, the same assessment criteria were used. The assessments of sites HUN15, HUN16 and HUN17 were reviewed by WBDC officers. It should be noted that sites HUN20 to HUN28 were not reviewed by WBDC officers.</i></u></p> <ul style="list-style-type: none"> • Para 2.7: make clear that those sites assessed within the HELAA or by HNPSG as ‘not developable within the next 15 years’ were not considered to be reasonable alternatives so did not progress beyond stage 2. • Para 2.7: as part of the examination of the Local Plan Review, a modification has been proposed to delete policy SP15 (see the Council’s response to the 	

Paragraph / policy in the pre-submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		<p>Inspectors Preliminary Questions PQ14 (a) and PQ14 (b), which is set out within EXAM 2.1 – see https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_740c0d87f76b43d19d9febf3c8caf272.pdf). The detail of policy SP15 is now proposed to be included within policy SP12 and within Chapter 8 of the Local Plan Review.</p>	
Appendix A		<ul style="list-style-type: none"> • A minor point, but it would be helpful to include a header/footer that includes a title and ‘Appendix A’ • Another minor point, but to help with readability, it would be helpful to have the table heading every page (use the ‘repeat as header row’ option in Word). • It would be helpful to distinguish between the sites assessed within the Council’s HELAA and within the ‘HELAA assessment’ undertaken by the steering group. • It would be helpful to add some more information to this to provide more context to the sites and their assessments, for example: <ul style="list-style-type: none"> ○ Development potential ○ Suitability conclusions – have a look at the latest iteration of the HELAA (https://www.westberks.gov.uk/helaa) which was published in Jan 2023 (see Appendix 4 (https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_740c0d87f76b43d19d9febf3c8caf272.pdf) and the tab in the spreadsheet called ‘Stage 2b Suitability’) which includes this. ○ Deliverability comments – it would be helpful to add to this to include information on the number of landowners, what issues may affect deliverability. Within the Jan 2023 version of 	<p>Archaeology Team:</p> <p>Final comment on Appendix A in the Submission document (possibly having 2 Appendix As) could be confusing.</p> <p>This one is the List of Nationally Designated Heritage Assets. Strictly speaking under ‘Heritage Category’ it would better if these words were Changed:</p> <ul style="list-style-type: none"> • Listing to Listed Building • Scheduling to Scheduled Monument • Parks and Gardens to Registered Parks and Gardens

Paragraph / policy in the pre- submission NDP	Paragraph / policy in the submission NDP	Pre-submission (Regulation 14) comments (August 2024)	Submission consultation (Regulation 16) comments
		the HELAA we updated the 'deliverability comments' column to include this.	

Appendices

Appendix A: Legal Compliance Check of the Hungerford NDP

Legal Compliance Check – Submission of Neighbourhood Plan

Neighbourhood Plan	Hungerford
The Qualifying Body	Hungerford Town Council
Date Submitted	31 October 2024
Date of Assessment	6 January 2025

Requirements and relevant legislation and/or guidance	West Berkshire District Council (WBDC) comments	Legally compliant?
<p>Neighbourhood Planning (General) Regulations 2012 (as amended) – Regulation 15 requirements:</p> <p><i>A qualifying body is required to submit:</i></p> <p><i>(a) A map or statement which identifies the area to which the proposed neighbourhood development plan relates</i></p>	<p>A map identifying the neighbourhood plan area can be found in the Submission Hungerford Neighbourhood Plan (NP) – see Figure 1.1 in Chapter 1 Introduction (page 5).</p>	Yes
<p><i>(b) A consultation statement;</i></p> <p>(the statement must contain details of (a) those consulted, (b) how they were consulted, (c) summarises the main issues and concerns raised and (d) how these have been considered, and where relevant addressed in the proposed Neighbourhood Plan – Regulation 15 (2) Neighbourhood Planning (General) Regulations 2012).</p>	<p>(a) A Consultation Statement accompanies the Submission Hungerford NP. Chapter 3 includes a link to details of the statutory consultees consulted. These include:</p> <ul style="list-style-type: none"> • Local Planning Authorities which adjoin West Berkshire • Parish and Town Councils within and adjoining West Berkshire • Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board 	Yes

Requirements and relevant legislation and/or guidance	West Berkshire District Council (WBDC) comments	Legally compliant?
	<ul style="list-style-type: none"> • Environment Agency • Historic England • Mid and West Berks Local Access Forum • Mobile UK • National Grid • National Highways • Natural England • NHS England South East • North Wessex Downs AONB • Police and Crime Commissioner • Scottish and Southern Electricity • Sport England • Thames Water • The National Federation of Gypsy Liaison Groups • West Berkshire Heritage Forum • West Berkshire District Council <p>The Consultation Statement also indicates that posters were placed around Hungerford Town, and articles were published within the local press.</p> <p>(b) The way in which interested parties were consulted is set out within paragraph 3.2 of the Consultation Statement. This explains that consultees were sent email notifications. Posters were placed around Hungerford Town, and articles included in the local press.</p>	

Requirements and relevant legislation and/or guidance	West Berkshire District Council (WBDC) comments	Legally compliant?
	<p>The Plan was available to view on Hungerford Town Council's website, whilst reference copies were also available in Hungerford library.</p> <p>(c) A summary of the main issues and concerns raised as a result of the pre-submission consultation are contained within Appendix A of the Consultation Statement.</p> <p>(d) The pre-submission consultation representations can be found within Appendix A. This appendix also details the response to each representation received and how they have been considered in the submission version of the Plan.</p>	
(c) <i>The proposed neighbourhood development plan;</i>	<p>The Local Planning Authority received the Submission Hungerford NP on 31 October 2024. It was accompanied by:</p> <p><u>Core documents:</u></p> <ul style="list-style-type: none"> • Basic Conditions Statement • Consultation Statement • Hungerford Neighbourhood Plan Strategic Environmental Assessment – Scoping Report • Hungerford Neighbourhood Plan SEA Environmental Report. • Hungerford Neighbourhood Plan Habitats Regulations Assessment. 	Yes

Requirements and relevant legislation and/or guidance	West Berkshire District Council (WBDC) comments	Legally compliant?
	<u>Evidence documents:</u> <ul style="list-style-type: none"> • AECOM (2019) Hungerford Housing Needs Assessment (HNA), for Hungerford Town Council • Icení (2022) West Berkshire Updated Housing Needs Assessment Update, for West Berkshire District Council • David Lock Associates (2019) West Berkshire Density Pattern Book, for West Berkshire Council • Hungerford Primary Shopping Areas Evidence Paper • Hungerford Local Green Spaces Justification Paper • Hungerford Neighbourhood Plan Site Assessment Report • Hungerford Neighbourhood Plan Site Assessment Report – Supporting Appendix A (HELAA sites) • Hungerford Neighbourhood Plan Site Assessment Report – Supporting Appendix B (Assessment of sites against HNP objectives) 	
<p><i>(d) A statement explaining how the proposed neighbourhood development plan meets the ‘basic conditions’, i.e. the requirements of paragraph 8 of Schedule 4B to the 1990 Act.</i></p> <p>The local planning authority has to be satisfied that a basic conditions statement has been submitted but it is not required at this stage to consider whether the draft plan or order meets the basic conditions. (PPG - Paragraph: 053 Reference ID: 41-053- 20140306)</p>	<p>A Basic Conditions Statement accompanies the Submission Hungerford NP. This considers each Basic Condition in turn and explains how each of the policies in the plan meets these.</p>	Yes
<p><i>(e) Environmental Assessment;</i></p>	<p>AECOM on behalf of the Hungerford Town Council have prepared a Strategic Environmental Assessment (SEA) Scoping Report in addition to a SEA Environmental</p>	Yes

Requirements and relevant legislation and/or guidance	West Berkshire District Council (WBDC) comments	Legally compliant?
<p>The Plan needs to be submitted with one of the following:</p> <ul style="list-style-type: none"> (i) a statement of reasons for a determination under regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 that the proposal is unlikely to have significant environmental effects OR (ii) an environmental report in accordance with paragraphs (2) and (3) of regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 (Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.) <p>If an Environmental Report is required, then this needs to have been subject to the required level of consultation and should comply with the government's SEA guidance. In terms of consultation, the 'consultation bodies' (Environment Agency, Historic England, and Natural England) must have been consulted at scoping stage (for 5 weeks). There is no requirement for public consultation on the scoping report. The draft Environmental Report on the pre-submission neighbourhood plan will need to be subject to public consultation for 6 weeks. The draft Environmental Report must be made available at the same time as the draft plan, as an integral part of the consultation process, and the relationship between the</p>	<p>Report. Both documents were submitted alongside the NP.</p> <p>As noted in the Consultation Statement, the preparation of the SEA Scoping Report included engagement with the three 'consultation bodies' (Environment Agency, Historic England, and Natural England).</p> <p>The SEA Environmental Report was subject to a six-week consultation at the same time that the pre-submission (Regulation 14) consultation was carried out, ie. between 16 February and 29 March 2024. The three 'consultation bodies' (Environment Agency, Historic England, and Natural England) were notified of the consultation.</p>	

Requirements and relevant legislation and/or guidance	West Berkshire District Council (WBDC) comments	Legally compliant?
two documents clearly indicated. (See A Practical Guide to the SEA Directive, ODPM – 2005)		
The draft neighbourhood Plan should be checked to ensure it is not a 'repeat' proposal. If so, the Local Planning Authority (LPA) can decline to consider the plan (1990 Act Schedule 4B Paragraph 5 and Regulation 18).	The Submission Hungerford NP is not a repeat proposal.	Yes
The body submitting the neighbourhood plan is authorised to act (2004 P & CP Act as amended by Localism Act 2011 Section 38 A (2) and 1990 Act schedule 4B as it applies- 61F (2)).	<p>The qualifying body is Hungerford Town Council. The neighbourhood area was designated on 9 April 2018.</p> <p>Hungerford Town Council, as the qualifying body, have formally (at a Town Council meeting on 7 October 2024) resolved to submit the NP to WBDC.</p> <p>The Plan was produced by the Hungerford NP Steering Committee, a group of volunteers and Town Councillors, having been commissioned to do so by the Town Council.</p>	Yes
<p>The pre-submission publication requirements need to have been satisfied. Before submission to the LPA the qualifying body should:</p> <p>1. Publicise (but this does not have to be on a web site) in a way that is likely to bring to the attention of people who live work or carry on business in the area details of:</p> <ul style="list-style-type: none"> (a) the proposals (b) when and where they can be inspected (c) how to make representations, and 	<p>The Consultation Statement demonstrates that these requirements have been satisfied:</p> <p>1. The Regulation 14 consultation version of the plan has complied with the regulations, and this is evidenced by the Consultation Statement which accompanies the Submission Hungerford NP. It shows in Chapter 3 that the Regulation 14 consultation was publicised by a variety of means including the display of posters throughout Hungerford and articles published in local press outlets.</p>	Yes

Requirements and relevant legislation and/or guidance	West Berkshire District Council (WBDC) comments	Legally compliant?
<p>(d) the deadline for making representations – not less than 6 weeks from first publicised.</p> <p>2. Consult any consultation body whose interests they consider may be affected by the proposals for a NP (please see Appendix A below).</p> <p>3. Send a copy of the NP to the LPA.</p> <p>(Regulation 14 of the Neighbourhood Planning (General) Regulations 2012).</p>	<p>The plan was available to view online at https://www.hungerford-tc.gov.uk/hungerfordNP, and reference copies were also available in Hungerford Library. The comments form which is linked to within the Consultation Statement in Chapter 3 explained how representations could be made and the address and website to be used. The consultation lasted for 6 weeks and ran from 16 February and 29 March 2024.</p> <p>2. The Consultation Statement within Chapter 3 includes a link to the list of the Statutory Consultees who were consulted as part of the Regulation 14 pre-submission consultation. Not mentioned within the Consultation Statement is that West Berkshire District Council sent notification emails on 16 February 2024 to all individuals and organisations on the West Berkshire Planning Policy Consultation database advising of the consultation.</p> <p>3. The NP Steering Group emailed WBDC on 1 February 2024 and the email included a link to the Town Council's website where the consultation documents would be available.</p>	
<p>The Conservation of Habitats and Species Regulations 2017 Regulations 105 and 106:</p> <p><i>A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority may reasonably</i></p>	<p>AECOM on behalf of Hungerford Town Council prepared a Habitats Regulations Assessment (HRA), and the Consultation Statement in Chapter 1 indicates that this was informed through engagement with Natural England.</p>	Yes

Requirements and relevant legislation and/or guidance	West Berkshire District Council (WBDC) comments	Legally compliant?
<i>require for the purposes of the assessment under regulation 105 or to enable them to determine whether that assessment is required</i>	The HRA was one of the documents published alongside the NP during the pre-submission (Regulation 14) consultation which took place between 16 February and 29 March 2024. Natural England was notified of the consultation.	
<p>Meets the definition of a 'neighbourhood development plan':</p> <p><i>"A plan which sets out policies (however expressed) in relation to the development and use and of land in the whole or any part of a particular neighbourhood area specified in the plan"</i></p> <p>(2004 Planning and Compulsory Purchase Act as amended by Localism Act 2011 Section 38 A (2))</p>	The Submission Hungerford NP meets the definition of a 'neighbourhood development plan'.	Yes
<p>Meets the scope of neighbourhood plan provisions, ie. specifies the period for which it covers, does not include provision about development that is 'excluded development' (as set out in section 61K of the 1990 Act) and does not relate to more than one neighbourhood area.</p> <p>(2004 Act s 38B (1, 2) (4))</p> <p>Meaning of 'excluded development':</p> <p>The following development is excluded development for the purposes of section 61J—</p>	<p>The Submission Hungerford NP specifies that it covers the period 2024 to 2041.</p> <p>The Submission Hungerford NP does not contain policies relating to 'excluded development'.</p> <p>It does not relate to more than the neighbourhood area.</p>	Yes

Requirements and relevant legislation and/or guidance	West Berkshire District Council (WBDC) comments	Legally compliant?
<ul style="list-style-type: none"> (a) development that consists of a county matter within paragraph 1(1)(a) to (h) of Schedule 1, (b) development that consists of the carrying out of any operation, or class of operation, prescribed under paragraph 1(j) of that Schedule (waste development) but that does not consist of development of a prescribed description, (c) development that falls within Annex 1 to Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment (as amended from time to time), (d) development that consists (whether wholly or partly) of a nationally significant infrastructure project (within the meaning of the Planning Act 2008), (e) prescribed development or development of a prescribed description; and (f) development in a prescribed area or an area of a prescribed description. 		

Conclusion: West Berkshire District Council confirms that the Hungerford Neighbourhood Plan meets the legislative requirements.

Where the draft neighbourhood plan submitted to a Local Planning Authority meets the requirements in the legislation, the Local Planning Authority must publicise the neighbourhood plan for a minimum of 6 weeks, invite comments, notify any consultation body referred to in the consultation statement and send the draft neighbourhood plan to independent examination (see regulations 16, 17, 23 and 24 of the Neighbourhood Planning (General) Regulations 2012 (as amended), Planning Practice Guidance - Paragraph: 054 Reference ID: 41-054-20140306).

Following examination, the Council will determine whether or not the plan is ready for a public referendum or if further modifications are required (Schedule 4B of the Town and Country Planning Act 1990 (as varied by s38A & 38C of the Town and Country Planning Act)). Please note that all references to primary and secondary legislation are to those enactments as amended.

Appendix A – Consultation Bodies

The Neighbourhood Planning (General) Regulations 2012 Schedule 1 Consultation bodies that the Parish Council or Neighbourhood Forum should consult (at pre-submission stage):

- In a London Borough, the Mayor of London
- A Local Planning Authority, county council or parish council any part of whose area is in or adjoins the area of the Local Planning Authority
- The Coal Authority
- The Homes and Communities Agency (now known as Homes England)
- Natural England
- The Environment Agency
- Historic England
- Network Rail Infrastructure Limited
- National Highways
- The Marine Management Organisation
- Any person to whom the electronic communications code applies, or who owns or controls electronic communications apparatus situated in any part of the area of the Local Planning Authority
- Where they exist a Primary Care Trust, licensee under the Electricity Act 1989, Licensee of the Gas Act 1986, sewerage undertaker and water undertaker
- Voluntary bodies whose activities benefit all or part of the neighbourhood area
- Bodies representing the interests of different racial, ethnic or national groups in the neighbourhood area
- Bodies representing the interests of different religious groups in the neighbourhood area and
- Bodies representing the interests of disabled people in the neighbourhood area.