



17th September 2010

Planning and Countryside Service
West Berkshire Council
Council Offices
Market Street
Newbury
RG14 5LD

Dear Sir/Madam

**OBJECTION TO BUILDING AT THE PRIORY INCLUDING PLATT COURT –
HUNGERFORD**

Reference:

A. 10/01928/FULEXT dated 2 Sep 10.

I would like to register the following personal objections (my wife is raising objections independently) to the proposed building work planned at Reference A.

Although my company has offices in London, I generally work at least 3 days a week from home and my study is in our attic/bedroom [converted over 30yrs ago] facing rearwards. Therefore I am directly facing the proposed buildings, which due to their height will look down directly into my house's bathroom, bedrooms and study. I now face 18 months [SHA representatives stated building time], probably 2 years of disturbance, dust, noise and light pollution, for the period of demolition and building, if this plan is passed.

The objection is also made in the light of verbal statements provided by SHA, architect and WBC representatives, noted at the time, during an expose of the plans at Fairfields (another restricted age development) in Hungerford in July 2010. That session was only attended by the families living at 141, 143 and 147 Priory Road and that was the only opportunity for direct consultation SHA provided. All those from 141, 143 and 147 Priory Road present were vociferous in their opposition at that meeting. Putting a notification on a website and a small advert in a newspaper is not a consultation, especially for a project this large and this damaging locally.

I refer to stakeholders throughout for brevity, meaning the local residents, school and nursery users; the medical, dental practices and businesses in Hungerford or the immediate area of the Priory and Platt Court. West Berkshire Council is abbreviated to WBC and Sovereign Housing Association to SHA.

My objections are:

- I have commented on the Hungerford Town Plan and in no part of that exposed did it state the requirement or need for yet more age restricted accommodation; I believe this would be the fourth development of "over 55's" accommodation in what is a small Market Town. The latest Hungerford Town Plan (2006) actually suggests that the town needs family accommodation, not single "vulnerable" or age restricted accommodation. Moving older residents from current SHA social housing to smaller accommodation does of course contribute to meeting that need, but I doubt that WBC will give Hungerford residents priority, so the local needs could be ignored. I look forward to the statement from WBC, currently lacking, that residents of Hungerford locale will have any priority for either the family housing freed up or the over 55 accommodation, especially for those who have spent most of not all their lives (be they young or old) in the locale. I believe that WBC and SHA will place people from Newbury, Thatcham into Hungerford, if not migrants from elsewhere. Approval of this scheme will contribute considerably to the aging demographic in the town, which can only be paid for by WBC Council Tax payers. There is no evidence of a recent WBC or SHA written requirement, as the result of an independent study confirming the need for this quantity of age restricted accommodation. The only desire for this project is in the minds of WBC and SHA persons, who have previously stated [plan viewing at Fairfields] that;

"they have been trying to build this accommodation in the Hungerford area for the last 10 years."

- The appointment of Leadbitter as the lead contractor does not seem to have been conducted through open competition. As SHA is a not for profit organisation it is funded/subsidised by WBC area council tax payers and from rental income. SHA and WBC are therefore required by EU law to compete contracts of over £250,000 in value and publish them in OJEU. I have not seen any evidence of any competition in this case [I have regular and archive access to OJEU and Government contracts bulletins, including Buying Solutions and Catalyst]. Whilst WBC and SHA may have a framework or "preferred supplier" list it would be normal for such a framework of list concerning public works to be regularly and independently assessed for Value for Money.... as there are a number of demolition and major building projects in and around Hungerford, Kintbury and Newbury.
- The building itself is not in keeping with local architecture and at 4 storeys high, is higher than any other in the town; even if SHA calls them lower ground, ground, 1st and 2nd floors, the building has 4 storeys; we look forward to the comedic moment when they are described as 3 ½ storeys as another seems to have been. As the building is so tall, so dense and so close, when the protected deciduous trees in our back garden and those immediately outside our boundary in the Priory's grounds, lose their leaves, WBC will again be denying us any privacy in any part of our back garden with views directly into our bedrooms and bathroom by day and by night. That privacy has already been significantly eroded by the previous incompetence [stated after Ombudsman review] of the WBC Planning staff. I no more want to look into the huge SHA building planned than I want SHA residents to look into

mine. Providing viewing access to numerous housing units down into our property, when we have a young daughter is, with same age female friends, unwarranted and is wholly unacceptable. The Plan alludes to extra planting as screening, but does not detail such. So I would like to help WBC/SHA/Contractors to mitigate that woolly none committal language by requesting a condition requiring the planting of dense evergreen trees [leylandii] on the plot along the rear of our and others boundaries (if they request it). The trees should grow to at least 40ft in height when mature, should be semi mature when planted and be planted between 1 and 5m's from our boundary on the Priory side of the fence. This will provide limited screening and enhance the privacy and security of the Extra care building and our properties... in about 10 years time when the trees have grown. The current trees are the subject of a protection order, even though one of the Hungerford landmark trees was cut down just as we moved in 4 years ago. Any attempt to excessively pollard, prune, lop or cut the trees or affect their roots will be referred to the relevant National Environmental NGOs, agencies and bodies including CPRE.

- Building on Green Belt Land. I believe that the Government has outlined controls on the building on Green Belt land via statements on "garden grabbing" which apply in this case, no matter what SHA very expensive Planning Consultants have advised. The SHA proposal seems to recognise but ignore this. As there is no supporting requirement, there can be no justification for building on Green Belt, therefore any building or car parking should be constrained to current Brown Belt land, ie be constrained to the current foundations of the Priory and Platt Court and current car parking.
- I have noted as I followed this plan over the last year at least that whilst there has been significant consultation, discussion and meetings mainly private or closed between WBC and SHA only recently have Hungerford Town Council and Hungerford residents been informed of these long standing plans. I the publication with the plan of some positive feedback forms. They do however only seem to have been written by those who may have an interest in future occupancy. I was given an opportunity to provide a Feedback Form at the very short notice expose of the plans in Jul 10 at Fairfields. I declined the gracious offer believing that to provide comment at that time might prejudice our ability to object now, or it might have given the false impression that this was a full, open and fair consultation, which it was not.
- WBC "Interest" in the Project. I understand that there has been at least one closed meeting between WBC and SHA to discuss and agree the sharing of the financial risk that SHA bear if planning permission is denied or the project is shelved for whatever reason. Paying for one of the country's leading Planning Consultancy firms must have cost tens if not hundreds of thousands of pounds of tax payer subsidies to SHA for consultants who I doubt are charged out at less than £1000 a day (plus VAT). This therefore implies that WBC have a direct financial interest in the planning permission being granted else they as guarantor or contributor will lose monies; monies raised through WBC Council Tax or Government settlement from direct taxation. This is at time of significant job losses in WBC and cuts in Services, imminently or in the

future. This direct WBC interest cannot be in the interest of a fair, objective and open assessment of the benefits and dis-benefits of the proposal and is an affront to local democracy and representation. Shame "Not for Profit" does not mean "Not without Cost".

- Transport infrastructure.

- Hungerford has a poor transport infrastructure already and this will be exacerbated by the influx of occupants and visitors cars and contractors vehicles to the site once built, let alone during construction. The site will need clear unimpeded access to Emergency vehicles 24/7/365 and such cannot be guaranteed through Priory Rd or Cold Harbour lane due to the number of cars, transit vans (including numerous SHA vans) that are parked along both roads every day. The proposal includes a restaurant/canteen for occupants, this will require staff at levels directed by legislation, and bulk provisions delivery, probably everyday if fresh food is to be available. The site does not seem to allow for contractors vans/lorries of significant size or tonnage to turn easily so adding to the noise pollution with all the "bleeping" reversing that will be required.
- The Secondary School is fed by numerous large coaches, teachers and parents transport twice a day and the Nursery has access all through the day and up to 6pm. Priory Rd has already been the subject of plans to provide traffic calming due to the excessive speed some people drive along it and to protect the School and Nursery children, which I supported. The extra care facility implies the housing of those less able or infirm as has been recognised in the plans for parking of mobility scooters. Yet the surrounding roads and pavements are not suited to regular use by mobility scooters with trained or untrained users, or those requiring use of frames to walk. The development is probably the farthest it can be from the town's shops and amenities and even the bus stop. The danger of mobility scooters to the walking public including in this case nursery and school children, has not been addressed even though it is regularly reported in national press.
- Being over 55 does not imply that the occupants will not be working still and therefore 76 housing units could contribute significantly to the already heavy traffic through the town's only main access road, the High Street/A338 at peak periods. We understand from the plans that parking will be restricted on site for occupants and therefore their visitors. We believe that cars can only then add to the already recognised dangers of Priory Road, as parking on Cold Harbour Lane is already stretched for occupants there, by parking on Priory Road by the entrance to the Priory, which will further impede traffic flow along the road with a dangerous bend by the Rugby Club, through and to the school and the leisure centre.
- Access to the site during building, if permission is granted, by contractors and site workers and visitors must for the duration of the

building work be the subject of accurately written, regularly tested and strictly enforced conditions, that are not then abandoned by application for Minor Amendments as WBC has a poor reputation for allowing but not enforcing. I am sure WBC planning staff would, to demonstrate their professionalism, take a keen and regular interest in the building work and the contractors adherence to plans and conditions, if these proposals are passed. Not to do so could be seen as incompetence. Perhaps WBC may decide that to mitigate the traffic problems during demolition and building, that a condition or requirement be applied that contractors vehicles be held elsewhere at a marshalling point, with communications to the site. This would allow vehicles to be called forward as required and would go straight onto site. The Triangle Field however is not a suitable marshalling site, "harbour" or holding area. Being entrepreneurial WBC might perhaps apply a penalty as and when contractor vehicles park on any of the town's roads (to prevent them simply moving from Priory Rd and Cold Harbour Lane to cause problems elsewhere). I am sure Hungerford residents would be only too happy to help out WBC staff in applying this condition. This does not mean that contractors be allowed to park or be marshalled on the common. This marshalling has worked very well at a building sit in East London, for the Olympic Games.

- Noise pollution. The plans show a "cafe style" open space directly behind and potentially within metres of the rear boundary of our property. We have been given no assurance that this will not be used for parties/celebrations/dances and as the doors are directly facing our property noise from inside the building will project towards us.
- Odour. The use of old drainage system without pre-treatment/effluent overflow from the buildings will contribute significantly to human and other effluent entering the aged sewerage system. I do not believe that the plans have addressed this issue in the detail required.
- Light Pollution. The plans do not show exactly where outside walkway (which runs next to out boundary) "streetlights" and security lights would be placed. Installing Security lights that directed powerful light towards our house is unacceptable and we would take action.
- The environment. There is limited real discussion on the environmental impact of the proposal, boxes have been ticked, yet there are no plans for installation of micro heat and power generation to reduce the impact of these, the largest buildings in Hungerford, on the environment. The Carbon Footprint must be huge, especially when all the contractors vehicles and machinery are taken into account. We would of course support WBC in its efforts to reduce the Carbon Footprint in the locale, ensuring that new builds come with appropriate energy saving devices and micro generation (micro, not a 100ft Wind Turbine). I would have thought with all that flat roof space it would be the ideal placement for a large piezo-electric tiled "farm".

- I believe that when WBC and SHA take their responsibilities for local engagement and communications seriously, that if this proposal is approved, they would publish on the internet and in local printed media (Newbury Weekly News and the Hungerford Advertiser), along with written copies in plain English for local residents by direct mail, at SHA cost, any minor amendments proposed by SHA, their representatives or consultants. This would allow stakeholders (current local residents, the school and any effected businesses) time to assess the impacts and make representation. I would hate to think the council might pass a minor amendment, without telling stakeholders who might be negatively affected.....
- I believe, having run OGC Gateway Reviews on major public sector programmes, that any well run project in the public or private sector should produce regular, perhaps monthly, Project Highlight Reports to Stakeholders. These normally state how the Project is performing against Time, Cost and Performance/Quality and would be of great interest to local stakeholders. I would therefore expect that any body contracting for such an expensive project would expect regular, at least quarterly Earned Value statements from the contractor to show just how well they are managing the project. This would show us how they will meet the agreed Project Plan and so not exceed any budget, time or performance tolerance agreed. Perhaps our local representatives might make those or other Performance Measures easily and in a timely manner available to local residents.

This project if approved will further erode the privacy of myself, my family and visitors, and that of other residents along Priory Road and Cold Harbour Lane. It will cause noise and light pollution, increase traffic and provides no benefit to current Hungerford Residents, less perhaps those who might, if they have enough "points" be accepted as occupants before the rest of WBC, Hampshire or Wiltshire. The buildings are not in keeping with the rest of the town are too dense and too big and we assume that most occupants will come from outside Hungerford. There is a no independently stated requirement or justification for more age restricted housing in Hungerford be it, social, affordable or otherwise and we do not believe that the Planning Process applied to date has been open, fair and democratic. WBC and SHA actions are slowly turning Hungerford into an over 55's ghetto but without the infrastructure or facilities to support the aging population.

I note that SHA has moved or evicted or are moving and evicting most of the occupants (2 of which either apparently own or have shared ownership of their flats), including the colony of bats.

....I am sure I saw a Crested Newt with its young in a puddle in the grounds of the Priory last week...



JW Giggins

Major (Retired)