

From: [REDACTED]
To: [REDACTED]
Subject: Representation Form - Local Plan Review 2022-239 Consultation on Proposed Main Modifications
Date: 29 January 2025 11:15:05
Attachments: [REDACTED]

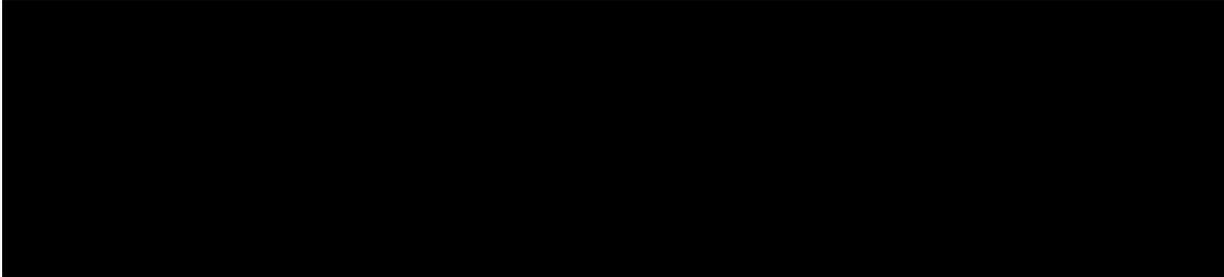
This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Planning

Please find attached a completed form on behalf of Hungerford Town Council.

Kind regards

Claire Barnes





**West Berkshire Local Plan Review 2022-2039 (LPR)
 Consultation on Proposed Main Modifications
 (6 December 2024 – 31 January 2025)**

Representation Form

Ref:
 (For official use only)

Please complete and return this form:	By email: [REDACTED]
	By post: Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	11:59pm on Friday 31 January 2025

Please read the **Guidance Note**, available on the Council’s website <https://www.westberks.gov.uk/lpr-proposed-main-modifications>, before making your representations.

This form has two parts:
 PART A – Your details
 PART B – Your representation(s)

Please complete a new form for each representation you wish to make.

<u>PART A: Your details</u>		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> <i>We cannot register your representation without your details.</i> <i>Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</i> 		
	1. Your details	2. Agent’s details (if applicable)
Title	Mrs	
First Name*	Claire	
Last Name*	Barnes	
Job title <i>(where relevant)</i>	The Clerk	
Organisation <i>(where relevant)</i>	Hungerford Town Council	
Address* <i>Please include postcode</i>	The Library, Church Street, Hungerford RG17 0JG	
Email address*	townclerk@hungerford-tc.gov.uk	
Telephone number	[REDACTED]	
Consultee ID <i>(if known)</i>		

*Mandatory Field

PART B – Your representation(s)

All comments made at previous stages of the LPR have been taken into account by the Inspector and there is no need to resubmit these. Publication of the proposed Main Modifications is a regulatory stage and any representations made should relate specifically to the legal compliance and soundness of the proposed Main Modifications and should not relate to parts of the Plan that are not proposed to be modified.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Your name or organisation (and client if you are an agent):	Hungerford Town Council
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Proposed Main Modifications and Proposed Changes to the Policies Map

1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:

Document name	Schedule of Proposed Main Modifications
Modification/Change reference number (MM / PMC)	MM5, MM7, MM3

2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:
(please tick/mark 'X' one answer for a and one for b)

- a) **Legally compliant** Yes No
- b) **Sound** Yes No

Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'

If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:
(please tick/mark 'X' all that apply)

Positively Prepared: The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	X
Justified: the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	X
Effective: the LPR should be deliverable	X
Consistent with national policy: the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	X

3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.

You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Hungerford Town Council wishes to comment as follows:

- 1) It agrees with and accepts the proposed 55 dwelling allocated in the plan which is identified in our draft Hungerford Neighbourhood Plan.
- 2) The text in several locations is still referring to the AONB. Presumably all references should now only refer consistently to either the North Wessex Downs National Landscape, or National Landscape.
- 3) MM3 Policy SP1. In this policy it refers to housing net densities on the edge of settlements of 30 and 20 per hectare on the AONB (National Landscape). We would suggest that the 30 per hectare should also apply to the AONB because:
 - a) There is little evidence to suggest a lower density of 20 per hectare fits in any better within an AONB
 - b) It means that to achieve the housing target 50% extra land is required and the key to minimising impact to the AONB is to take up less land
 - c) Lower densities make housing less affordable and harder to deliver low cost housing.

Recommend that the wording is changed to state:

Developments on the edge of defined settlements are generally expected to secure a net density of 30 dwellings per hectare outside of the AONB, and 20 dwellings per hectare within the AONB.

- 4) MM5: support the reference to Neighbourhood Plans to clarify the exceptional circumstances necessary for any allocation of a major development in the National Landscape.
- 5) MM7 SP3. Query the statement that non-strategic allocations within a settlement boundary do not count towards the dwelling numbers, which is notably problematic for settlements within the National Landscape. The difficulty with this approach is that the only way to meet the housing number is through extending the settlement boundary when there may well be suitable brown field sites, which should be given the highest priority since they are generally more sustainable. In the National Landscape minimising development into green fields is important.

Suggest that the wording of MM7 para 4.34 is changed to: 'Non-strategic residential allocations within Neighbourhood Plans situated within defined settlement boundaries, except those in the National Landscape with more than 5 dwellings, will not count towards meeting the housing requirement figure in policy SP12.' The second sentence should be deleted.

6) On a related matter, the Reg 16 Hungerford Neighbourhood Plan proposes to allocate two sites and to amend the settlement boundary to encompass these allocations. The extract from the policy map below shows the allocations HUN12 & HUN13 within the extended settlement boundary. The proposed new paragraph after para 4.34, could effectively mean that the allocations are not strategic and are within the settlement boundary, therefore the 55 dwelling requirement for Hungerford is not being met. Therefore, it is suggested that either: (i) the wording should be clarified in the Local Plan to make clear that a NP can amend the settlement boundary once allocations have been made; or (ii) a response provided by the Local Plan Inspector so that the NP Examiner could, if needed, suggest that the settlement boundary is amended to exclude these site allocations.



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Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?
(Please be as precise as possible)

Page number	
Paragraph number	
Comments:	
No comment	

Habitats Regulations Assessment

5. Do you have any comments on the addendum to the Habitats Regulations Assessment of the Proposed Main Modifications (November 2024)?

(Please be as precise as possible)

Page number	
Paragraph number	
Comments:	
No comments	

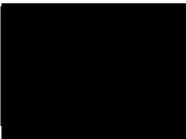
Notification of Progress of the Local Plan Review

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

(please tick/mark 'X' all that apply)

<i>The publication of the report of the Inspector appointed to carry out the examination</i>	X
<i>The adoption of the Local Plan Review</i>	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy Team.

Signature		Date	27th January 2025
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Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.