


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	Your details	Agent's details (if applicable)
Title:	Mr	
First Name:*	Chris	
Last Name:*	Scorey	
Job title <i>(where relevant):</i>	Land & Commons Secretary	
Organisation <i>(where relevant):</i>	The Town and Manor of Hungerford	
Address* <i>Please include postcode:</i>	Town Hall High Street Hungerford RG17 0NF	
Email address:*	[REDACTED]	
Telephone number:	[REDACTED]	

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	The Town and Manor of Hungerford
---	----------------------------------

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	Policy DM7 Water Resources and Waste Water
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

 Yes

No

Please give reasons for your answer:

2. Soundness

Please see the guidance notes for an explanation of what ‘soundness’ means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	Yes	
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		No
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	Yes	
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	Yes	

Please give reasons for your answer:

We do not regard it as justified to apply a safeguarding provision to land owned by the Town and Manor of Hungerford charity, without prior consultation and despite the existence of a more suitable alternative site for future upgrades to the Waste Water Treatment Works at Hungerford.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

 Yes

No

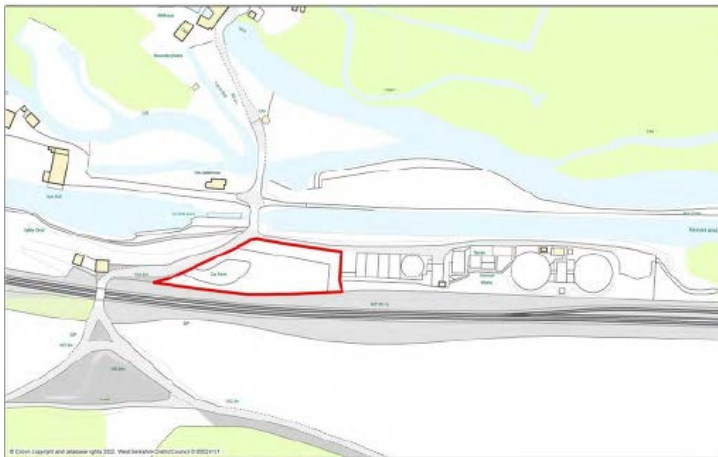
Please give reasons for your answer:

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

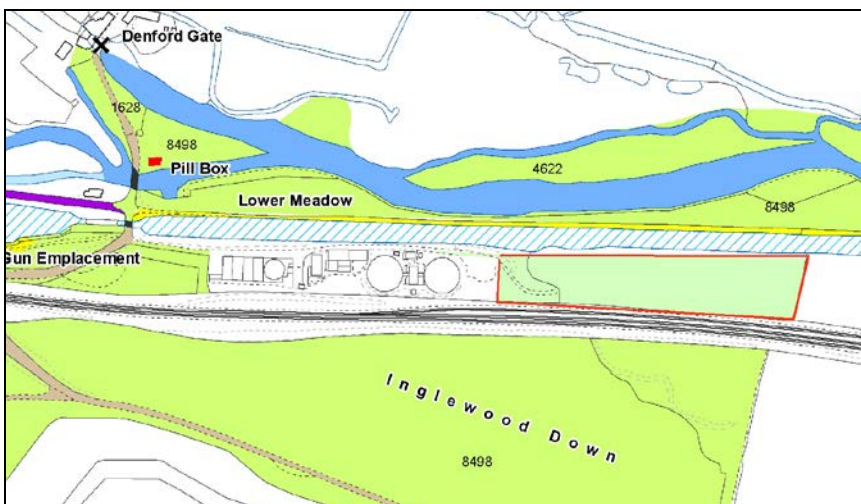
You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Proposed Submission states that “land adjacent to the Hungerford Waste Water Treatment Works (as shown on the plan below), will need to be safeguarded to enable upgrades to the Waste Water Treatment Works to serve future growth” We do not regard this proposal as “sound” for the reasons given below.



The land in question is owned by the Town and Manor of Hungerford and has ancient Commoners’ rights dating back many centuries. It is one of the few parking areas on Hungerford Common and is widely used by walkers and fishermen including members of the Hungerford Canal Angling Association. It is also used by organisations running events on the Common, by contractors working for Thames Water and by Network Rail who have a licence to use it for track access and parking.

The Town and Manor owns a parcel of land to the east of the Sewerage Works as outlined in red on the plan below, which we suggest would be far more suitable for safeguarding and future expansion of the Works. This land is not used by the general public, is larger and is only accessible via the Sewerage Works. It is already licensed on an annual basis to Thames Water. The land has no agricultural value and may well be categorised as “brownfield”, having been the site of the town rubbish dump in past centuries.



We request that references to our car park being identified for safeguarding by the West Berkshire Phase 2 Water Cycle Study (2021) be removed and replaced by reference to our alternative site and with a revised plan showing the eastern site.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

Yes

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

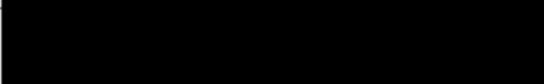
Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	Yes
The publication of the report of the Inspector appointed to carry out the examination	Yes
The adoption of the Local Plan Review	Yes

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	22/2/2023
-----------	---	------	-----------

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.