


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

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

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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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	Mrs
First Name:*	Robert	Henny
Last Name:*	Mullan	Handley
Job title (where relevant):	Estates Bursar	Associate Director
Organisation (where relevant):	Pangbourne College	Turley Associates
Address* Please include postcode:	Pangbourne College Pangbourne Reading RG8 8LA	The Pinnacle 20 Tudor Road Reading RG1 1NH
Email address:*	████████████████████	████████████████████
Telephone number:	0118 976 6690	████████████████

\*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):	Mrs Henny Handley (Agent), Turley Associates on behalf of Pangbourne College
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	SP1, SP2 and DM19
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

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
<b>Positively Prepared:</b> 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		✓
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
<b>Effective:</b> 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	✓	
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	✓	

Please give reasons for your answer:

*The plan fails to consider whether Pangbourne, as a rural service centre, can accommodate development outside of the existing settlement, in particular, to contribute to meeting the needs of specialised housing as set out in Policy DM19.*

*Pangbourne College has a suitable, available and deliverable site (Bowden Fields) which could provide elderly living accommodation to meet the ever growing need (and unmet demand) and assist with meeting the Council's housing requirement.*

## 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

No

Please give reasons for your answer:

n/a

#### 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 plan should be amended to identify sites in and round Pangbourne, which is identified within the settlement hierarchy (SP3) and the second highest tier settlement with extensive services and facilities available.*

*Allocating sites for specialist housing, in this instance older persons accommodation / retirement living, plays a key part in allowing family housing within villages to be made available on the open market, bringing new economically active adults into the area and assisting in sustaining local services and facilities. It also provides job opportunities for the local community and allows older people to stay in their communities with additional support.*

*Bowden Fields sits outside of, but less than 2km of, Pangbourne village centre. It has existing development in form of sports facilities and pitches with suitable vehicular access. The site is screened by existing trees and hedging to the south and by residential properties to all other boundaries. Bowden Fields can be developed without adverse impact on the wider landscape due to the existing screening. Access to the site can be provided from Yattendon Road to the south, with the access to be upgraded as required.*

*There are no Flood Risk issues in relation to the site, with surface water drainage matters capable of being dealt with through the detailed design stage.*

#### 5. Independent Examination

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

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*

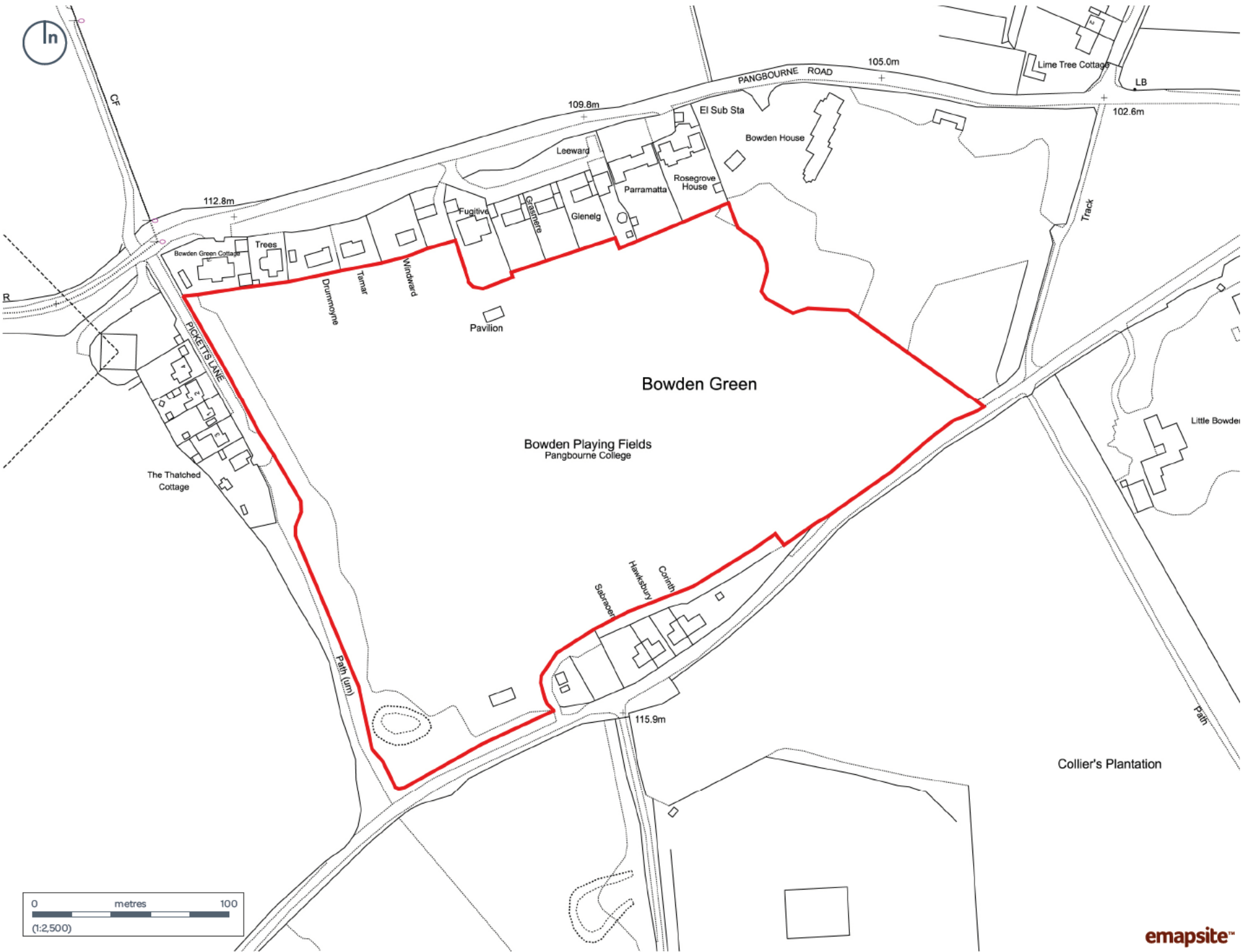
The submission of the Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓

The adoption of the Local Plan Review	✓
---------------------------------------	---

*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.*

<b>Signature</b>	██████████	<b>Date</b>	<b>02/03/2023</b>
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**



**CLIENT**

Pangbourne College

**PROJECT**

Bowden Fields,  
Pangbourne

**DRAWING:**

Site Location Plan

**PROJECT NO.**

PANS3001

**DRAWING NO.**

1201

**REVISION**

-

**STATUS**

Submission

**SCALE**

1:2,500 @ A4

**DATE**

02/03/2023

**DRAWN BY**

CD

 Site boundary

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## 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.

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Your name or organisation (and client if you are an agent):	Mrs Henny Handley (Agent), Turley Associates on behalf of Pangbourne College
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**Please indicate which part of the Local Plan Review this representation relates to:**

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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

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
<b>Positively Prepared:</b> 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		✓
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
<b>Effective:</b> 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		✓
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

Please refer to accompanying letter.

**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

No

Please give reasons for your answer:

Please refer to accompanying letter.

**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.*

*Please refer to accompanying letter.*

### 5. Independent Examination

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

Yes

No

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

*In order to ensure that the Inspector understands the merits of the sites available for development at Centenary Fields and Bere Court Road.*

*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	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

*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.*

<b>Signature</b>		<b>Date</b>	01/03/2023
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**

2 March 2023

**Delivered by email**

Planning Policy Team  
West Berkshire Council  
Planning and Transport Strategy, Council Offices  
Market Street  
Newbury  
RG14 5LD

Ref: PANR3003

To whom it may concern,

## **RE: WEST BERKSHIRE LOCAL PLAN REVIEW**

These representations have been prepared by Turley on behalf of Pangbourne College and provide comments on the Regulation 19 Consultation currently taking place in relation to the West Berkshire Local Plan Review 2022-2039.

As you will be aware our client has important land interests in the Local Plan area, including the Pangbourne College estate. The majority of the estate lies to the north of Pangbourne village and surrounds the main core of the college, sports facilities and boarding houses. Additional land within the College's ownership includes the Boathouse on the western edge of the village.

These representations provide commentary on the consultation document as a whole, as well as specifically in relation to two parcels of land within our clients' ownership. Separate representations are submitted in relation to other parcels of the College's land.

## **LOCAL PLAN CONTEXT**

The current Development Plan comprises the Core Strategy (adopted 2012) and the Housing Site Allocations DPD adopted in 2017. The Core Strategy covers the plan period up to 2026 and is premised on the housing need set out within the now revoked South East Plan.

This consultation relates to the Local Plan Review covering the period up to 2039. We fully support the principle of the Council reviewing the plan as it provides the opportunity for development needs (for new homes, employment and other land uses) to be considered based on an up-to-date evidence base. Furthermore, it provides the opportunity for the Council to take into consideration any unmet needs from neighbouring authorities and the need to fulfil the Duty to Co-operate.

There are some significant physical and technical constraints within the District, including AWE Burghfield and Aldermaston and area of flood plain. The AONB is a policy and landscape designation that covers over 60% West

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20 Tudor Road  
Reading  
RG1 1NH

T 0118 902 2830 [turley.co.uk](http://turley.co.uk)

Berkshire, however, not all areas of the AONB are of such a high quality as to warrant their immediate dismissal from consideration in terms of allocating housing sites.

## HOUSING REQUIREMENT AND THE SPATIAL STRATEGY

The Local Plan Review will make provision to provide between 8,721 and 9,146 new homes during the plan period which will equate to between 513 and 538 dwellings per annum. This range is the minimum requirement derived by using the standard method plus a 5% buffer. The plan makes reference to needing to accommodate Reading's unmet need of 230 dwellings.

The LPR does not seek to allocate sufficient housing sites to meet this identified need, instead leaving some of the housing requirement to be delivered through Neighbourhood Plans. This approach does not provide certainty that the housing requirement will be met within the plan period as there are no current Neighbourhood Plans which are proposing to allocate new housing sites.

Proposed Policy SP1 (Spatial Strategy) states that development will be focused on three spatial areas: Newbury and Thatcham, the Eastern Area and the North Wessex Downs AONB.

The spatial strategy for the North Wessex Downs AONB is set out in proposed Policy SP2 (North Wessex Downs AONB) and confirms that there will be appropriate and sustainable growth that conserves and enhances its special landscape qualities. The Housing Background Paper (January 2023) sets out at paragraph 5.7 that allocations within the AONB have been directed to the settlements within the settlement hierarchy

It is of note, however, that the LPR does not allocate any housing to Pangbourne and only very limited housing to both Hungerford and Lambourn (the two other larger settlements within the AONB).

## SETTLEMENT HIERARCHY

Pangbourne is identified by Proposed Policy SP3 as being a Rural Service Centre (the same designation as is currently has through ADPP1 of the Adopted Core Strategy). This is the second tier of settlements after the main urban areas of Newbury, Thatcham and the Eastern Urban Area. SP3 identifies Rural Service Centres as larger rural settlements offering development potential appropriate to the character and function of the settlement.

Pangbourne has a mainline railway station offering direct high speed services to Oxford, Reading and London and has frequent bus services operating into Reading and to other surrounding towns and villages. Within the village centre there is a supermarket, bank, pharmacy, post office, doctors surgery, library, primary school, public houses, dental practices, places of worship, a protected employment area, convenience stores, restaurants and takeaways, and a village hall, as well as a youth / water sports centre, children's play areas and sports grounds.

The LPR evidence base includes the settlement boundary review topic paper. Appendix 1 of the topic paper – the audit criteria for services and facilities states that:

*“A settlement's accessibility to services and facilities is defined by a 1 kilometre radius from the centre of the settlement and for access to railway stations and employment opportunities within 2 kilometres. These distances demonstrate a reasonable commutable walking distance as suggested by the Chartered Institution of Highways and Transportation (Providing for Journeys on Foot 2000)”*

Appendix 2 – the settlement audit identifies the range of services and facilities available in Pangbourne and maps the 1km and 2km distances. It is of note that the whole of the Pangbourne College Estate is within 2km of the centre of the settlement, and a large proportion lies within 1km.

Appendix 3 – the audit matrix and settlement scores identifies Pangbourne as the joint third highest scoring settlement within the District (excluding the main urban areas). It scores 40 points out of a maximum of 48, losing points for matters such as the lack of a mobile library (despite it having a permanent one). It is clearly one of the most sustainable settlements within the district.

Paragraph 4.19 of the LPR states that Pangbourne has limited development opportunities, we disagree with this statement. Pangbourne does have development opportunities with sites such as those identified later on in this letter, which would go a long way towards providing well designed and appropriate development as natural extensions of the existing settlement, within acceptable distances from the centre of the village as defined in the settlement hierarchy topic paper.

Pangbourne does not have a neighbourhood plan, and therefore, sites are unlikely to come forward through one in the early part of the new plan period.

Pangbourne is also designated as a District Centre through proposed Policy SP22 and it is considered important that, in order to support the vitality and viability of district centres, additional housing should be brought forward in combination with economic and commercial growth. This will ensure that businesses can thrive through both additional customers as well as employees being able to live locally and the facilities such as the local schools benefit from additional families in the area. This is of particular importance when the local school has a falling roll as evidenced by the schools allocation data available on the Council's website. It is considered that further housing should be allocated to settlements where district centres are supported, such as Pangbourne.

There is a clear need for housing to be provided at Pangbourne given its status within the sub region, its sustainability in terms of the services and facilities it provides as well as its proximity to Reading and its role within the Greater Reading Area. The existing settlement boundary is tightly drawn around the existing built form of Pangbourne and as such it will need to be revised to accommodate an appropriate level of growth.

The LPR does not propose housing allocations in and around Pangbourne. We consider that this approach is artificially restricting the level of new housing development that can come forward and that not proposing any allocations at one of the most sustainable settlement in the District is unsound.

The NPPF sets out that the tests of soundness include positively prepared, justified, effective and consistent with national policy.

For a plan to be considered positively prepared, it needs to provide a strategy that seeks to meet the area's objectively assessed needs together with any unmet need from other authorities. It is considered that this plan does not allocate housing in accordance with its settlement hierarchy to meet its housing needs.

The plan is not considered to be justified in its approach as it seeks for the remainder of its unallocated housing need to be met through windfall sites and neighbourhood plans instead of allocating developable and available sites. Therefore, we do not consider the strategy to be appropriate.

We do not consider that the plan will be effective in delivering the amount of development needed in the area as it fails to fully address its housing need through site allocations.

For these reasons, we consider that the plan cannot be considered to be sound.

## LAND AT CENTENARY FIELDS

The site at Centenary Fields (location plan included at appendix 1) lies on the periphery of the College's estate, along Bere Court Road and close to the existing settlement boundary. Vehicular access to the site is taken from an existing driveway track serving the residential properties known as St Vincent, Rodney and Derwent. This track is a former access to Pangbourne College itself and has sufficient visibility splays to accommodate additional traffic.

The site is screened to all boundaries by existing trees and hedging and sites on a plateau meaning its visibility from the wider countryside and AONB is limited.

In sustainability terms, the facilities within Pangbourne all lie within less than 1km of the site, wholly within the most accessible distance outlined in the Council's settlement hierarchy topic paper. Bere Court Road is a quiet rural road and there is a footpath within 200m of the site which provides off road access to Pangbourne Hill, where there is a segregated footway into the village centre and railway station. Alternative routes into the village on foot include Courtlands Hill, which is a quiet private street.

In 2010 planning permission was granted on appeal for the residential redevelopment of former College properties 75m to the west of the Centenary Fields site. In allowing the appeal and granting planning permission the Inspector stated that

*"the location's closeness to the settlement boundary would ensure that the option of a journey on foot or by bicycle would also be available ... the site's location is not unsustainable."*

This is echoed by the Council's own evidence in the settlement hierarchy topic paper which sets out the acceptable distances from services and facilities as 1km to 2km. The whole of this site lies within that area.

### Technical considerations

There are no Flood Risk issues in relation to the site, with surface water drainage matters capable of being dealt with through the detailed design stage.

An initial ecological appraisal has been carried out which confirmed that there are no statutory designated sites of ecological value that would be affected by the development and that only the boundaries of the site have the potential to offer suitable habitats from some ecological species. Whilst further surveys will be required and appropriate mitigation strategies may be required to support a planning application, the retention of the mature boundaries will ensure that any species present will be protected and managed appropriately.

The site was assessed by the Council through the Housing and Economic Land Availability Assessment (HELAA) 2020 and was considered unsuitable for allocation because:

*Development would result in harm to the natural beauty and special qualities of the AONB.*

*Development would be inappropriate in the context of the existing settlement form, pattern and character of the landscape.*

Due to these constraints, the Council considered that the site would not be developable within the next 15 years.

In light of the Council's up to date evidence the site is considered to be appropriate in the context of the existing settlement form, especially given the residential enclave of properties immediately to the west of the site and the very large extensions and redevelopments of residential properties on the southern side of Bere Court Road.

This site would essentially be the infilling of the gap between an estate of houses and the existing settlement.

The location of the site on a plateau with higher ground to the north and dense screening to the south is such that there would be no adverse landscape impact and no harm to the beauty and special qualities of this part of the AONB.

## **LAND AT BERE COURT ROAD, PANGBOURNE**

This site is located adjacent to the Bewley development known as Croft Drive, which was deemed to be a sustainable location by a Planning Inspector (location plan included at Appendix 2).

Bere Court Road is characterised by residential plots comprising large residential properties accessed directly from the road via private driveways. This gives a 'ribbon development' effect to this area. This site presents an ideal location to add a small number of further properties to this land reflecting on the existing development pattern. It is considered that the site could be a suitable location for a number of self build development plots given the diverse style and character of the existing properties in the locality; many of which have been extensively remodelled, extended or redeveloped recently.

In sustainability terms, the facilities within Pangbourne all lie within less than 2km of the site, wholly within the most accessible distance outlined in the Council's settlement hierarchy topic paper. Bere Court Road is a quiet rural road that leads out onto Pangbourne Hill, where there is a segregated footway into the village centre and railway station. Alternative routes into the village on foot include Courtlands Hill, which is a quiet private street.

In 2010 planning permission was granted on appeal for the residential redevelopment of former College properties immediately adjacent to this site. In allowing the appeal and granting planning permission the Inspector stated that

*"the location's closeness to the settlement boundary would ensure that the option of a journey on foot or by bicycle would also be available ... the site's location is not unsustainable."*

This is echoed by the Council's own evidence in the settlement hierarchy topic paper which sets out the acceptable distances from services and facilities as 1km to 2km. The whole of this site lies within that area.

## **Technical considerations**

There are no Flood Risk issues in relation to the site, with surface water drainage matters capable of being dealt with through the detailed design stage.

In light of the Council's up to date evidence the site is considered to be appropriate in the context of the existing settlement form, especially given the existing residential properties along Bere Court Road and the new properties immediately to the north of the site.

The location of the site in amongst existing trees and vegetation means it would be well visually screened and such that there would be no adverse landscape impact and no harm to the beauty and special qualities of this part of the AONB.

## **CONCLUSIONS**

To summarise, we broadly support the Council's approach to the Local Plan Review but consider that the plan is not currently sound because it has not been positively prepared, is not justified and not effective for the reasons set out above. We consider that our client's land interested can assist in meeting the District's development needs, through the delivery of housing. These representations also confirm the suitability of the two sites for small extensions to the existing settlement.



We trust you will take our representations into consideration. Should you require any further information in respect of the above please do not hesitate to contact me.

Yours sincerely



Henny Handley  
**Associate Director**





CLIENT

Pangbourne College

PROJECT

Centenary Fields,  
Pangbourne

DRAWING:

Site Location Plan

PROJECT NO.

PANS3001

DRAWING NO.

1001

REVISION

-

STATUS

Submission

SCALE

1:1,250 @ A4

DATE

02/03/2023

DRAWN BY

CD

 Application boundary

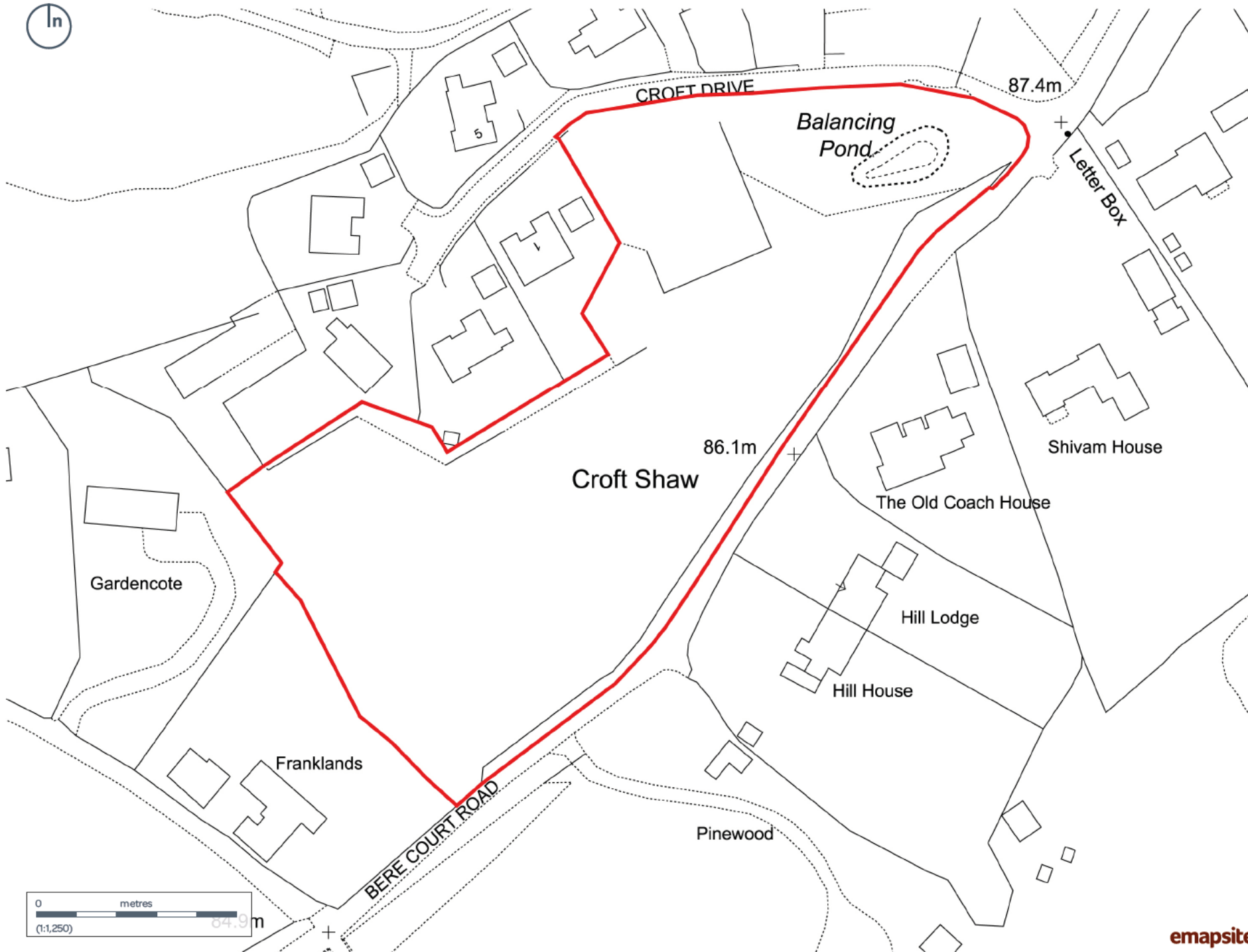
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**Turley**



**CLIENT**

Pangbourne College

**PROJECT**

Bere Court Road  
Pangbourne

**DRAWING:**

Site Location Plan

**PROJECT NO.**

PANS3001

**DRAWING NO.**

1101

**REVISION**

-

**STATUS**

Submission

**SCALE**

1:1,250 @ A4

**DATE**

02/03/2023

**DRAWN BY**

CD



Application boundary

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## Part B – Your Representation

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Your name or organisation (and client if you are an agent):	Mrs Henny Handley (Agent), Turley Associates on behalf of Pangbourne College
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**Please indicate which part of the Local Plan Review this representation relates to:**

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Appendix:	
Policies Map:	Settlement Boundary
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

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
<b>Positively Prepared:</b> 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		✓
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
<b>Effective:</b> 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	✓	
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	✓	

Please give reasons for your answer:

*The plan fails to consider amendments to the existing settlement boundary to include existing developed areas and anomalies within the existing mapping that would form a logical part of the existing settlement.*

## 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

No

Please give reasons for your answer:

N/A



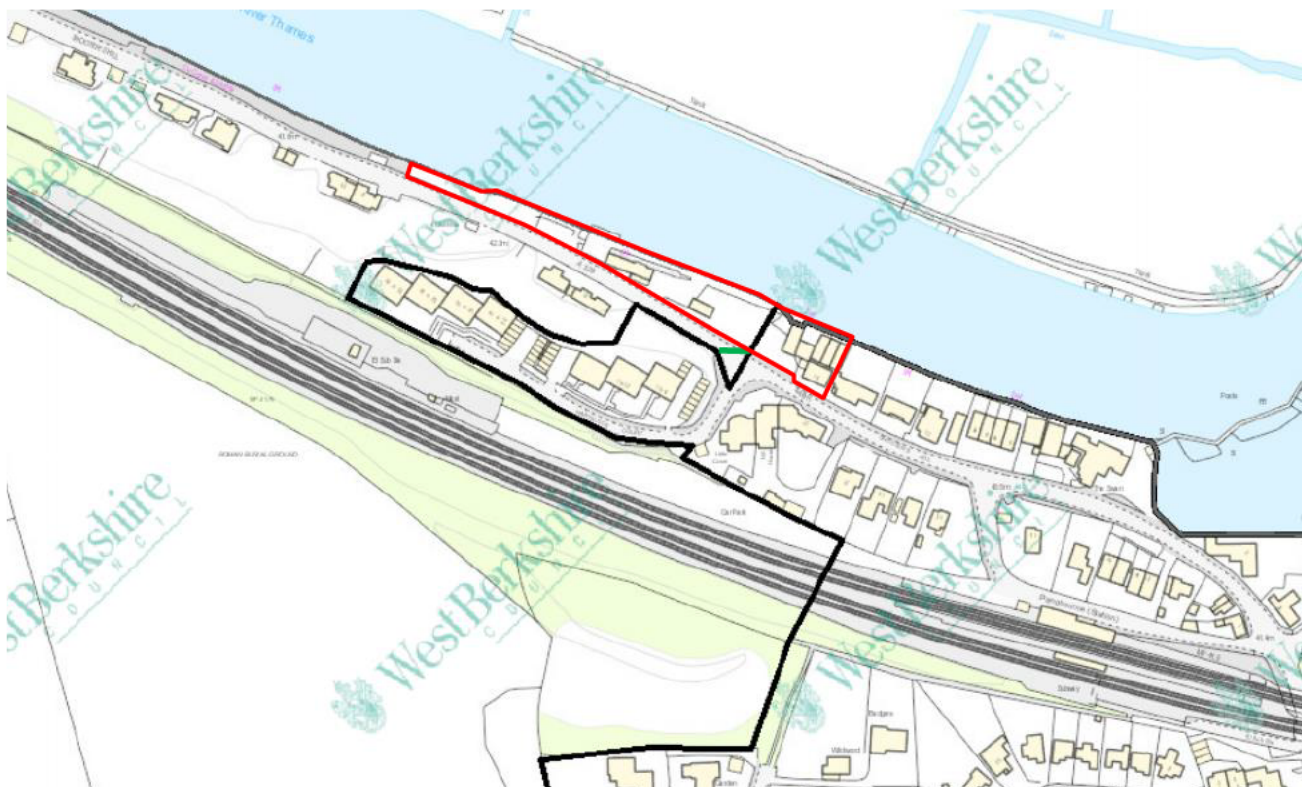
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**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification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

It is considered that the settlement boundary around Pangbourne should be reviewed to take into the account the “on the ground” position of the Pangbourne College boathouse site, where the settlement currently dissects the site artificially.

The below map extract shows the existing settlement boundary (black line), the proposed change to it shown in the Settlement Boundary Background Paper 2022 as part of Local Plan Review (green line) and the Pangbourne College boathouse site (red line). We consider that there is no rationale for the settlement not extending to the end of the boathouse site, which would align with the settlement edge at Hartslock Court. This would form a more logical edge to the settlement to reflect the existing built for within the settlement and would not extend it beyond the current eastern extent.



There is no logical rationale for the placement of the current settlement boundary line and it is requested that it is amended to include the whole of the site. This is not a major modification to the proposed plan but instead corrects the current on the ground position.

Submissions have previously been made throughout the emerging Housing Site Allocations DPD process proposing the amendment of the settlement boundary to include the site which is considered more closely reflects the existing pattern of development on this edge of Pangbourne.

#### 5. Independent Examination



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

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	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

*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.*

██████████	██████████	<b>Date</b>	<b>02/03/2023</b>
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**