

Comment

Agent	Lucy White (1333544)
Email Address	[REDACTED]
Address	
Consultee	Julia Bond (1333545)
Email Address	[REDACTED]
Company / Organisation	Bradfield College
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Bradfield College (Julia Bond - 1333545)
Comment ID	PS15
Response Date	23/02/23 10:12
Consultation Point	Appendix 2 Settlement Boundary Review (View)
Status	Processed
Submission Type	Web
Version	0.4
Bookmark	Bradfield College (Represented by Lucy White Planning)

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . No

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. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

- . Bradfield College supports the proposed amendments to the settlement boundary of Bradfield which incorporate the full extent of the indoor Tennis Centre, sports centre car park, Crossways house, boarding houses at the top of the hill and teaching facilities on Buscot Hill.
- . However, the proposed amendments should extend further to include:
 - . The Moat – a College building used for goods deliveries immediately west of the Blackburn Science Centre; and
 - . The staff accommodation to the west of Faulkner's Green.
- . With reference to the criteria for review of the settlement boundaries (Settlement Boundary Review Background Paper December 2022), the above sites do not warrant exclusion from the settlement boundaries. The sites do not occupy highly visible areas on exposed ridges, land forms or open slopes on the edge of settlements. Whilst the staff accommodation occupies higher land, it is visually contained by mature landscaping and visually connected to the College campus, in particular the Science Centre and visitor car park to the north and indoor sports facilities to the east. The pattern of residential development cannot be described as loose knit, sporadic or dispersed development.
- . The Moat lies immediately adjacent to the proposed extension of the settlement boundary and an associated cluster of principal College buildings which front onto the public highway and is well related to these buildings.
- . The inclusion of land opposite Faulkner's Green within the settlement boundary would provide the College with the opportunity to enhance the provision of staff accommodation through redevelopment and/or infill to deliver an improved mix of house types and sizes to meet the needs of staff and achieve a more efficient use of the land within the settlement than allowed under countryside policies.
- . The Bradfield College Campus Development Framework (June 2019), endorsed by WBC, identifies land at The Moat as suitable to meet future needs of the College through development of a new academic teaching facility. The inclusion of the existing built development within the settlement boundary would align with these agreed principles.
- . Accordingly, in respect of the tests of soundness the inclusion of these areas within the settlement boundary of Bradfield would represent a positively prepared policy approach consistent with paragraph 79 of the NPPF (2021) to locate housing in rural areas where it can enhance or maintain the vitality of rural communities and paragraph 84 to enable the expansion of all types of rural businesses.

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

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

Yes

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 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.

The settlement boundary of Bradfield should be amended further to include The Moat and residential properties to the west of Faulkner's Green for the reasons set out above.

5. Independent Examination

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

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.

To explain the rationale for including additional land within Bradfield's settlement boundary and the particular benefits of an enlarged settlement boundary for directing and controlling future development.

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

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

Comment

Agent	Lucy White (1333544)
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Company / Organisation	Bradfield College
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Bradfield College (Julia Bond - 1333545)
Comment ID	PS16
Response Date	23/02/23 10:03
Consultation Point	Policy SP 5 Responding to Climate Change (View)
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Bradfield College (Represented by Lucy White Planning)

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

Please give reasons for your answer

No comment.

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

- . Bradfield College broadly supports the principles of Policy SP5 to deliver new developments which are more resilient to climate change. In particular, it supports the recognition that the application of the policy will depend on the nature and scale of the proposals. It is often impractical or inefficient in the case of small scale alterations or extensions to existing College buildings to overhaul the energy strategy for the building as a whole, or to introduce a separate energy strategy for the extension alone when the existing infrastructure remains fit for purpose and could support an enlarged building. Bradfield College acknowledges it has a significant part to play in reducing carbon emissions and is exploring opportunities to introduce renewable and low carbon infrastructure as part of a whole campus strategy. In accordance with NPPF, paragraphs 155 and 156, Policy SP5 should support employers and organisations to develop such strategies and for these to be taken into account when considering planning applications for individual development proposals on campus which may benefit from a longer term approach for lower carbon/renewable energy sources.
- . The following observations are made regarding the policy criteria:
 - . In accordance with the National Planning Policy Framework (paragraph 154, 2021 Version), any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Accordingly, Policy SP5 can encourage but not require delivery of measures which would exceed the prevailing Building Regulation requirements.
 - . Criteria c) and e) require new development to generate and supply of renewable, low and zero carbon energy and to supply local distribution networks. In the case of schools, colleges and other institutions, the policy should be positively prepared to support the delivery of energy strategies which could ultimately meet the whole campus needs through renewable and low carbon energy generation. This policy should recognise that it may not be feasible or practical for all individual developments to generate and supply energy but opportunities may exist to connect into existing or proposed "off-site" renewable/low carbon infrastructure as part of a whole campus energy strategy.

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

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

Yes

Please give reasons for your answer

No comment.

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 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.

The following observations are made regarding the policy criteria:

- . In accordance with the National Planning Policy Framework (paragraph 154, 2021 Version), any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Accordingly, Policy SP5 can encourage but not require delivery of measures which would exceed the prevailing Building Regulation requirements.
- . Criteria c) and e) require new development to generate and supply of renewable, low and zero carbon energy and to supply local distribution networks. In the case of schools, colleges and other institutions, the policy should be positively prepared to support the delivery of energy strategies which could ultimately meet the whole campus needs through renewable and low carbon energy generation. This policy should recognise that it may not be feasible or practical for all individual developments to generate and supply energy but opportunities may exist to connect into existing or proposed "off-site" renewable/low carbon infrastructure as part of a whole campus energy strategy.

5. Independent Examination

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

No comment.

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

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

Comment

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Company / Organisation	Bradfield College
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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Bradfield College (Julia Bond - 1333545)
Comment ID	PS17
Response Date	23/02/23 10:12
Consultation Point	Policy SP 23 Transport (View)
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Bradfield College (Represented by Lucy White Planning)

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

- 1 Policy SP23 requires all developments that generate a transport impact comply with its policy criteria, including provision of improved opportunities for active travel and to facilitate sustainable travel particularly within, between and to main urban areas and rural service centres.
- 2 The policy sets a minimum residential threshold of 30 dwellings for applications to be accompanied by a Transport Statement or Assessment. However, the policy fails to specify a comparable threshold for non-residential development and therefore when the provisions of Policy SP23 would apply to new development. Accordingly, the policy is inconsistent with national planning policy, in particular paragraph 105 of the NPPF (2021).
- 3 In the absence of a minimum size threshold, the application of Policy SP23 would be open to interpretation by the LPA and Applicants, with potentially onerous requirements placed upon relatively modest developments. In the case of Bradfield College, a long-established co-educational college in the rural area of West Berkshire, Policy DM38 provides general policy support for its future development. However, it could prove unfeasible for the College to meet the criteria of Policy SP23 given its rural location in a settlement which lies outside the settlement hierarchy. Existing public transport services and active travel infrastructure is particularly limited and it is highly unlikely that development proposals at the College could support any meaningful enhancement of this infrastructure.
- 4 Strict application of this policy could thwart future proposals for growth at the College, despite its long-established and important contribution to the local economy and community infrastructure.
- 5 Policy thresholds for non-residential development and exceptional circumstances should be identified through the policy to clarify the applicability of the policy.

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

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

Yes

Please give reasons for your answer

No comment.

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 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.

For the reasons set out above, policy thresholds for non-residential development and exceptional circumstances should be identified through the policy to clarify the applicability of the policy.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

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

Comment

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Consultee	Julia Bond (1333545)
Email Address	[REDACTED]
Company / Organisation	Bradfield College
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Bradfield College (Julia Bond - 1333545)
Comment ID	PS18
Response Date	23/02/23 10:05
Consultation Point	Policy DM 1 Residential Development in the Countryside (View)
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Bradfield College (Represented by Lucy White Planning)

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

Please give reasons for your answer

No comment.

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

- 1 The supporting text to Policy DM38 (Development on Existing Educational and Institutional Sites in the Countryside) refers to Policy DM1 as relevant in the consideration of applications for staff accommodation in locations in the countryside, in terms of infill. Bradfield College supports the recognition through Policy DM38 that residential schools and colleges have a need for staff housing within or close to the campus to enable certain staff to fulfil their role within the boarding school/college.
- 2 Bradfield College is a full boarding school, with weekend and evening programmes. In order to ensure, the health, safety, security and well-being of pupils, the College needs to house a significant number of staff on site. It is also essential that sufficient staff live on-site in order to fulfil academic, pastoral and co-curricular demands, including duties outside the normal teaching timetable.
- 3 The demands placed upon staff continue to increase as the regulatory requirements and expectations in relation to Health and Safety, Security and Child Protection are raised.
- 4 The success of the College is in large part attributable to its sense of community which has been established through the close relationships established between staff and pupils. The ability of staff to live on campus and be available to pupils day and night has made a significant contribution towards the success of the College. However, the College is unable to house sufficient staff on the College campus and it currently rents circa 20 properties in the wider area, which is sub-optimal and poses operational challenges.
- 5 Although the College acknowledges the benefits of the overarching strategy to locate new housing at existing main urban areas to achieve sustainable patterns of development, the plan should acknowledge that where established residential schools, colleges and institutions can demonstrate a need for additional staff accommodation and the benefits associated with its provision within or in close proximity to the campus, a specific policy exception should allow for infill and small-scale redevelopment of existing residential areas outside the defined settlement boundaries.
- 6 As drafted, Policy DM1's policy exceptions to new residential development outside of adopted settlement boundaries do not include housing for staff at existing educational or institutional sites. The exception for housing to accommodate rural workers is limited to workers associated with agricultural, forestry and other land based rural businesses (paragraph 11.43)

- 7 Criteria h of Policy DM1 only allows for limited residential infill in settlements in the countryside with no defined settlement boundary. The policy does not expressly allow for such infill proposals where settlement boundaries are in place, such as Bradfield.
- 8 As a result Policy DM1 provides no policy support for new staff housing to meet the needs of Bradfield College beyond the defined settlement boundary of Bradfield, despite the availability of existing College staff housing outside the settlement boundary which would be eminently suitable for infill development and replacement dwellings and the acknowledgment under Policy DM38 that circumstances may justify staff housing beyond the existing settlement boundaries.
- 9 To be consistent with paragraph 82d of the NPPF (2021), the Local Plan should be flexible enough to accommodate needs not anticipated in the plan, allowing for new and flexible working practices (such as live-work accommodation). Accordingly, an additional criteria for staff housing specific to schools, colleges and other residential institutions should be incorporated into Policy DM1 to clarify its application in respect of Policy DM38 and to allow for infill development beyond settlement boundaries to meet the needs of rural residential institutional settings for staff accommodation.

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

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

Yes

Please give reasons for your answer

No comment.

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 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.

- 1 As drafted, Policy DM1's policy exceptions to new residential development outside of adopted settlement boundaries do not include housing for staff at existing educational or institutional sites. The exception for housing to accommodate rural workers is limited to workers associated with agricultural, forestry and other land based rural businesses (paragraph 11.43)
- 2 Criteria h of Policy DM1 only allows for limited residential infill in settlements in the countryside with no defined settlement boundary. The policy does not expressly allow for such infill proposals where settlement boundaries are in place, such as Bradfield.
- 3 As a result Policy DM1 provides no policy support for new staff housing to meet the needs of Bradfield College beyond the defined settlement boundary of Bradfield, despite the availability of existing College staff housing outside the settlement boundary which would be eminently suitable for infill development and replacement dwellings and the acknowledgment under Policy DM38 that circumstances may justify staff housing beyond the existing settlement boundaries.
- 4 To be consistent with paragraph 82d of the NPPF (2021), the Local Plan should be flexible enough to accommodate needs not anticipated in the plan, allowing for new and flexible working practices (such as live-work accommodation). Accordingly, an additional criteria for staff housing specific to schools, colleges and other residential institutions should be incorporated into Policy DM1 to clarify its application in respect of Policy DM38 and to allow for infill development beyond settlement boundaries to meet the needs of rural residential institutional settings for staff accommodation.

5. Independent Examination

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

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.

To explain the importance of amendments to Policy DM1 to support and enable the delivery of new staff accommodation for independent boarding schools and colleges in the rural areas of West Berkshire.

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

- | | | |
|--|---|-----|
| 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 |

Comment

Agent	Lucy White (1333544)
Email Address	[REDACTED]
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Consultee	Julia Bond (1333545)
Email Address	[REDACTED]
Company / Organisation	Bradfield College
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Bradfield College (Julia Bond - 1333545)
Comment ID	PS19
Response Date	23/02/23 10:11
Consultation Point	Policy DM 38 Development on Existing Educational and Institutional Sites in the Countryside (View)
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	Bradfield College (Represented by Lucy White Planning)

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

Please give reasons for your answer

No comment.

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

- 1 Bradfield College broadly supports Policy DM38 and the allowances for new development in the countryside at existing educational sites. As noted at paragraph 12.56, Bradfield College's campus lies partially outside the settlement boundary of Bradfield College and in order to meet its ongoing operational needs it is necessary for some developments to take place beyond the settlement boundary.
- 2 In respect of the policy criteria, Bradfield College makes the following comments:
- 3 This criterion requires a demonstration that there are no existing buildings or accommodation within the site or wider ownership of the establishment, or in proximity that can reasonably be used before development would be considered acceptable in the countryside. The reference to "or in proximity" is of concern to the College. This suggests the College would need to demonstrate that buildings outside of their ownership, but in proximity to the campus, could not reasonably be used to meet the College's needs. It is not reasonable to expect applicants to assess the suitability of buildings outside of their ownership, which may not be available for purchase, to meet their needs.
- 4 This criterion requires the design of new buildings to respect local building styles and materials. The policy does not allow for contemporary building designs which may introduce alternative building forms and materials which contrast but complement traditional building styles. Bradfield College includes many listed buildings and heritage assets and lies within a Conservation Area. However, recent developments have included contemporary buildings including the Tennis Centre, Music School and Blackburn Science Centre which have successfully assimilated alongside traditional building styles. This policy criteria should be broadened to allow for sensitively designed contemporary buildings where appropriate.
- 5 This criterion states that new or replacement buildings should be located within or adjoining existing buildings or groups of buildings. A minor correction is requested to improve the legibility: ***"New or replacement buildings are located adjoining existing buildings or within or adjoining existing groups of buildings."***

The support for proposals identified through estate plans and development frameworks at paragraph 12.58 is thoroughly welcomed by Bradfield College. The College adopted a Campus Development Framework in June 2019 with the endorsement of West Berkshire Council which establishes a framework for future development across the campus, supported by technical assessments. The Local Plan's

support for development frameworks provides reassurance to schools and colleges that the time and effort involved in the production of such documents can be worthwhile and the agreed principles will carry weight in the determination of future planning applications.

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

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

Yes

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 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.

- 1 In respect of the policy criteria, Bradfield College makes the following comments:
- 2 This criterion requires a demonstration that there are no existing buildings or accommodation within the site or wider ownership of the establishment, or in proximity that can reasonably be used before development would be considered acceptable in the countryside. The reference to "or in proximity" is of concern to the College. This suggests the College would need to demonstrate that buildings outside of their ownership, but in proximity to the campus, could not reasonably be used to meet the College's needs. It is not reasonable to expect applicants to assess the suitability of buildings outside of their ownership, which may not be available for purchase, to meet their needs.
- 3 This criterion requires the design of new buildings to respect local building styles and materials. The policy does not allow for contemporary building designs which may introduce alternative building forms and materials which contrast but complement traditional building styles. Bradfield College includes many listed buildings and heritage assets and lies within a Conservation Area. However, recent developments have included contemporary buildings including the Tennis Centre, Music School and Blackburn Science Centre which have successfully assimilated alongside traditional building styles. This policy criteria should be broadened to allow for sensitively designed contemporary buildings where appropriate.
- 4 This criterion states that new or replacement buildings should be located within or adjoining existing buildings or groups of buildings. A minor correction is requested to improve the legibility: **"New or replacement buildings are located adjoining existing buildings or within or adjoining existing groups of buildings."**

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

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