

Sandhurst Neighbourhood Plan 2022 to 2037

Consultation response form

PART A

1. Contact details

- 1.a Please provide your name, address, and email address.
If you are an agent, please include your organisation and who you are representing.

Please note we cannot accept anonymous representations.

	Personal details	Agent details (if applicable)
Name	Councillor [REDACTED] Birch	
Organisation (where relevant)	Sandhurst Town Council	
On behalf of (where relevant)	Sandhurst Town Council Neighbourhood Plan steering group	
Address line 1	Council Offices	
Address line 2	Sandhurst Memorial Park	
Town	Sandhurst	
County	Berkshire	
Post code	GU47 9BJ	
Email address	[REDACTED]	

All comments will be publicly available, and identifiable by name and organisation (where applicable). Please note: The Council is obliged to collect and handle information about individuals in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). Further information can be found on our website: <https://www.bracknell-forest.gov.uk/help/privacy-notices/planning-privacy-notice>

PART B

2. Representations – Comment 1

2.a Please state which part of the neighbourhood plan your comments relate to.

Paragraph number	5.5	Policy reference	NP/EN 5
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2.b Do you support, object, think modifications are needed, or wish to comment on this paragraph? (please select one answer)

Support ☒

Support with modifications..... ☐

Object ☐

Comment ☒

2.c Please provide the reasons for your support/objection to the specific part of the plan in the box below. It is helpful if you relate your comments to the basic conditions and other relevant legal requirements. Please be as precise and detailed as possible and set out the grounds for your objection. (Continue on a separate sheet if necessary).

The Sandhurst Town Council Neighbourhood Plan steering group are keen to ensure the draft Local Green Space policies are considered with the most recent data dealing with considerations under the NPPF para 107.
We have therefore attached a paper under separate cover with this consultation response form.

2.d Please set out what change(s) you consider are necessary and why. These should be related to the objection you have raised. It would be helpful if you could put forward your suggested revisions to the wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet if necessary).

2. Representations – Comment 2

2.e Please state which part of the neighbourhood plan your comments relate to.

Paragraph number	NA	Policy reference	NA
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2.f Do you support, object, think modifications are needed, or wish to comment on this paragraph? (please select one answer)

Support ☐

Support with modifications..... ☐

Object ☐

Comment ☐

2.g Please provide the reasons for your support/objection to the specific part of the plan in the box below. It is helpful if you relate your comments to the basic conditions and other relevant legal requirements. Please be as precise and detailed as possible and set out the grounds for your objection. (Continue on a separate sheet if necessary).

Comment 1 only responded to.

2.h Please set out what change(s) you consider are necessary and why. These should be related to the objection you have raised. It would be helpful if you could put forward your suggested revisions to the wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet if necessary).

2.i If you have additional comments for your representation, please include additional Part B pages. Please make sure any additional pages are clearly labelled/ addressed and attached.

3. PART C

- 3.a Most examinations are expected to be through written representations. If the Examiner decides there is a need for a public hearing, please state below whether you would like to participate.

- 3.b If a public hearing is necessary, would you like to participate? (Please select one).

Yes, I wish to participate at a public hearing ☒

No, I do not wish to participate at a public hearing ☐

Please note the Examiner will determine whether a public hearing is necessary.

- 3.c If a public hearing is required, please set out why you consider that your participation is necessary (continue on a separate sheet if necessary).

I would like to attend with the Sandhurst Neighbourhood Plan steering group members:

Chairman – Mr [REDACTED] Booker

Vice Chairman – Cllr [REDACTED] Birch

Cllr [REDACTED] I Brossard

Cllr [REDACTED] Butcher

Mrs [REDACTED] Trevis

The team has a wealth of knowledge that could assist in providing detail that others may not have.

- 3.d If you would like to be notified of Bracknell Forest Council's decision to 'make' the Sandhurst Neighbourhood Plan under Regulation 19 (to bring it into legal force), please tick the box below.

Yes, please notify me ☒

The consultation closes on Wednesday 1 July 2026 at 5pm.

Sandhurst Neighbourhood Plan. Regulation 16 comments from the Neighbourhood Plan Steering Group

Introduction

The Steering Group have reviewed BFC's Regulation 14 response as to the interpretation on NPPF para 107 c). They have additionally taken cognisance of the Examiner's report to the nearby Finchampstead Neighbourhood Plan when referencing NPPF 107 c). The reviews have been summarised into a Regulation 16 consultation response.

Para 107 c) of the NPPF relates to an element of the parameters that are used to determine where land can be defined as Local Green Space. Para 107 c) notes that to comply with a Local Green Space designation the area should be '*local in character and is not an extensive tract of land*'.

The Steering Group note that both the NPPF and related government guidance notes do not specify any size limit on a Local Green Space.

It would appear that both BFC, in respect of comments relating to the Regulation 14 response to the Sandhurst Neighbourhood Plan, and the Examiner's comments relating to the Finchampstead Neighbourhood Plan may have used an unofficial rule of thumb limit on a Local Green Space area of possibly circa 20 ha. This appearing to be applied irrespective of any other significant compliance with NPPF paras 107 a) (*in reasonable close proximity to the community it serves*), 107 b) (*demonstrably special to the local community and holds a particular significance, for example because of its beauty, historic significance, recreations value, tranquillity or richness of its wildlife*) and the preface to para 107 c) '*local in character*'.

The Steering Group's following comments have been drafted to provide reasoning why the application of any arbitrary and unofficial size limits may not be appropriate when determining the proposed designation of Local Green Spaces LGS 6 and LGS 7.

The following comments are to be read in conjunction with and to supplement the extensive evidence and supporting information included within NP Appendix 4, introduction and paras 5, 6, 7, 8, 9, 10, 11 and 12 and responses to BFC Regulation 14 comments included within NP Appendix 8 Consultation Statement. All to demonstrate that both LGS 6 and LGS 7 should not be considered as an extensive tract of land.

The Steering Group comments are also considered to be substantiated by recent LGS designations proposed by nearby Wokingham Borough Council's emerging local plan local green space designations.

- 1 **Nearby Wokingham Borough Council have recently instigated a proposed update of their Local Plan. As recently as September 2024 they submitted detailed assessments of Local Green Spaces. Their intentions include the production of an Emerging Local Plan to cover the period to 2040. Part 2 Hearings commenced in March 2026. A Local Green Space Assessment accompanied their Regulation 19 submission update.**
- 2 The importance of the current Wokingham considerations as regards the determination parameters regarding Local Green Space designations are considered to provide substantiation to the Sandhurst Neighbourhood Plan's assessment of LGS 6 (area circa 29 ha) and LGS 7 (area circa 15 ha) (particularly in respect of these areas **not** to be argued that they could be considered extensive tracts of land).
- 3 The area covered by Wokingham Borough Council includes Finchampstead Parish Council. Areas within Finchampstead make up elements of the Blackwater Valley Corridor that are located immediately west of and indeed linked to Sandhurst.
- 4 The objectives of the Sandhurst Neighbourhood Plan and Finchampstead Parish Council have been to enhance and protect the areas defined by the Blackwater Valley Countryside Partnership as a natural space for the enjoyment of current and future generations. This includes, in respect of Sandhurst, land and surrounding countryside associated with Horseshoe Lake (LGS 6) and Grove Lake (LGS 7). This is of particular importance due to the anticipated increase in housing developments in areas within nearby elements covered by Wokingham, Bracknell and Hart Councils. Once these housing developments are concluded there will likely be significant increased visitor numbers to hopefully enjoy the rural ambience of the areas near the lakes within the Blackwater Valley Corridor. These are one of the salient reasons why it is considered that related areas should be designated as Local Green Space such that their rural pleasures can have further protection. Key to their designation is to retain their field margins, particularly as they are elevated. The elevated field margins being of fundamental importance in maintaining the rural ambience of the valley corridor.
- 5 The essence of the determination of Wokingham's Local Green Space designations within their Emerging Local Plan was not to limit its determination based on an unofficial specific size. Each designation of Local Green Space was considered on its own merits as regards what was considered not 'an extensive tract of land'. The merits of each area highlighting their benefits against plain and arbitrary countryside.

- 6 An extract from Wokingham BC's Local Green Spaces Assessment, Appendix 8 detailed assessments (dated September 2024) noted the following referenced Local Green Space large areas. These areas appear to have been subject to rigorous checking and research to ensure that they could not be defined as extensive tracts of land and therefore fell within the requirements of the NPPF to be considered (together with other parameters) as Local Green Spaces.

- i) LGS 013, Rooks Nest, 16.9 ha
- ii) LGS 165, Charvil Country Park, 31.2 ha
- iii) LGS 055. Lower Earley Meadows, 91.95 ha with qualifications. When the qualifications are considered the resulting LGS is approaching 40 ha.
- iv) LGS 056, Lower Earley Meadows (Riverside Park), 17.1 ha
- v) LGS 064. California Country Park, 46.3 ha
- vi) LGS 216, Heath Lake, 22 ha
- vii) LGS 008, Fox Hill. 27.6 ha
- viii) LGS 018a/018b, Cantley Park, (13.7 plus 15.8) 29.5 ha
- ix) LGS 007a/007b, Bulmershe, (31.5 plus 38.2) 69.7 ha
- x) LGS 105, Ashenbury Park, 24.9 ha

The above Local Green Space maps were subsequently included within Appendix K of the proposed Local Plan Submission documents.

- 7 It is noted that the initial Finchampstead Neighbourhood Plan did propose several Local Green Spaces. However, a number of these were not recommended as acceptable by the Examiner (his report dated 2nd May 2023) due to the Examiner's consideration that they were extensive tracts of land, albeit all other Local Green Space requirements appear to have been accepted. The final Plan was 'made' on 21st September 2023.

- 7.1 It is noted that all of the Finchampstead areas considered as extensive tracts of land at examination stage were less in size than many of the sites included within Wokingham's September 2024 LGS Regulation 19 assessment. Indeed, some of the sites not accepted by the Examiner have been reintroduced by Wokingham in their Emerging Local Plan LGS assessment. It is also understood that Finchampstead will additionally reintroduce some of the initially 'not recommended' Local Green Space sites at a time when their neighbourhood plan can be updated. This will follow the conclusion of Wokingham's local plan updates and is intended to be instigated within the near future. The Examiner's report did, however, predate the current Wokingham LGS assessment.

- 7.2 The Steering Group additionally note that BFC may also be referring to an unofficial size limit when and if determining if Local Green Spaces may be considered as extensive tracts of land. This is evidenced by their previous Regulation 14 comments.
- 7.3 The logic behind the LGS 6 and LGS 7 local green space assessments are considered to coincide with a broader interpretation of NPPF para 107 c). The Steering Group consider that determination of local green spaces should not be determined by an unofficial area restriction of circa 20 ha but be determined by a reasonable assessment of the parameters set out in NPPF para 107 and associated government guidelines
- 7.4 **It is the Steering Groups view that determination of Local Green Spaces LGS 6 and LGS 7 be considered on their merits in a similar fashion as the apparent nearby Wokingham LGS's and not be limited by any perceived unofficial area. It is reiterated that the NPPF and related Government Guidance Notes do not specify any specific area restrictions on Local Green Spaces. The intention of NPPF 107 c) being to avoid Local Green Space designations containing extensive arbitrary countryside. LGS 6 and LGS 7, with reference to the supplementary evidence contained within NP Appendix 4, are considered to demonstrate that they are special to the local community and therefore should not be considered as just arbitrary countryside.**