



Examiner of the Sandhurst Neighbourhood Plan

30 June 2026

Dear Sir/Madam,

SANDHURST NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION RESPONSE

The following relates to Bracknell Forest Council's response (as the Local Planning Authority) to the Regulation 16 consultation on the Sandhurst Neighbourhood Plan (19 May to 1 July 2026). This response does not include any comments from the Council as a landowner.

Bracknell Forest Council is generally supportive of the Sandhurst Neighbourhood Plan, and appreciates the work invested by those involved in the preparation of the Plan.

Basic conditions and other suggested changes/comments

We have set out our comments in relation to the basic conditions in Appendix 1. It is considered that a number of policies, as currently worded, do not meet the basic conditions namely:

- A) regard to national policy and guidance,
- D) contributing to the achievement of sustainable development,
- Ea) have the effect of preventing development from taking place,
- F) not breaching retained EU obligations and is otherwise compatible with' EU Obligations, as set out Appendix 1, and
- G) meets and complies with prescribed conditions and matters e.g. whether or not it has a significant effect on habitats sites.

Other comments that do not relate directly to the basic conditions are set out in Appendix 2 of this response. The Council considers that the suggested changes to policies/ supporting text (including factual updates) will help to ensure consistency and robust decision making. Comments made at the Regulation 14 stage have been reiterated where it is considered they have not been addressed.

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Strategic Environment Assessment and Habitats Regulations Assessment

The Bracknell Forest Council Strategic Environmental Assessment and Habitats Regulations Assessment Screening Determination, October 2025, concluded that the Sandhurst Neighbourhood Plan was unlikely to have significant environmental effects in relation to the SEA Regulations, and was not likely to lead to significant effects on the integrity of habitats sites, and therefore did not require Strategic Environmental Assessment (SEA) and Habitat Regulation Assessment (HRA).

However, Policy NP/D3 'Conservation and enhancement of Grade II*, Grade II listed and locally listed buildings' was substantially rewritten following the Regulation 14 consultation and is effectively an entirely new policy which has not been through SEA /HRA.

Legal compliance requirements

We wrote to the Qualifying Body on 24 March 2026 informing them of recent changes to the Neighbourhood Planning legislation, including that following the Levelling-up and Regeneration Act 2023 coming into force on 25 March 2026, there are two further legal compliance requirements for Neighbourhood Plans. The Qualifying Body sought to explain how these had been addressed in Section 7 of their Basic Condition Statement (Appendix 9).

We have reviewed the Basic Condition Statement and have the following comments in relation to the contribution the Neighbourhood Plan makes to adaption to climate change:

- Policy NP/D4 'Trees and hedgerows' – whilst protecting trees will help Sandhurst to adapt to climate change, the replacement requirements are very onerous and will not in themselves mitigate the impact.
- Policy NP/EN1 'Development in the Blackwater Valley Corridor and Crowthorne/Sandhurst Heathland' – the policy does not provide any specific details of the expected outcome of the need to restore the valued features of the surrounding landscape character, so it is difficult to conclude that this policy will help adaption to climate change.
- Policies NP/ECC1 'Energy saving' and NP/ECC2 'Heat pumps' – we agree that these policies help adaption to climate change.

Although not mentioned in the basic condition statement, the Council also notes the following policies may make a contribution to the adaptation to climate change:

- Policy NP/D2 'Residential developments on brownfield sites, infill sites and development of residential gardens within the settlement of Sandhurst' – includes some measures that may help with adaption to climate change, including SuDS and permeable paving.
- Policy NP/T2 'Safe pedestrian and cycle routes' – improved routes may encourage the use of sustainable transport modes rather than reliance on the private car.
- Policy NP/T3 'Residential parking' – the increase in parking standards for qualifying residential schemes in Sandhurst may encourage car ownership and use, over more sustainable alternatives contrary to the aim of adapting to climate change.
- Policy NP/T4 'Sustainable transport' – improved pedestrian routes and regular bus services may encourage the use of sustainable transport modes rather than reliance on the private car.

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Overall, we consider that the Neighbourhood Plan, where relevant, will make a contribution to the adaptation to climate change.

There is a Berkshire Local Nature Recovery Strategy (LNRS) that covers the designated Sandhurst Town Neighbourhood Area. The LNRS can be found here: [Berkshire's Local Nature Recovery Strategy | RBWM Together](#). We have reviewed the Basic Condition Statement and have the following comments in relation to compliance with the aims and objectives of the LNRS:

- Priority 1 – the designation of Local Green Space (LGS6 and LGS7) does not necessarily improve the quality and habitat in agricultural land and the wider countryside, since there is no reference in Policy NP/EN5 to managing this land or enhancing it.
- Priority 2 – we agree that Policy NP/D4 has the potential to enhance the overall quality of the woodland, although we have some detailed concerns about some of the criteria (see Appendix 1).
- Priority 3 – the designation of Local Green Space (LGS 6 and LGS7) does not improve the quality and connectivity of woodland pasture and parkland, since there is no reference in Policy NP/EN5 to managing this land or enhancing it.
- Priority 4 – the encouragement given to protect the SANG areas within Shepherd Meadows and Horseshoe Lake could support this LNRS priority. However, SANG status on these sites is already in place so it is unclear what value the Neighbourhood Plan adds to this.
- Priority 5 – although Policy NP/EN2 does not specifically refer to wet woodland, we agree that this policy could lead to an increase in the extent and connectivity of wet woodland to increase patch size and connectivity.
- Priority 6 – we agree this is not applicable to the Sandhurst Neighbourhood area
- Priority 7 – we agree that the designation of Local Green Spaces in urban areas via Policy NP/EN5 could improve the quality of urban habitats.
- Priority 8 – the designation of Local Green Spaces does not increase the canopy cover and habitat connectivity in urban areas, since there is no reference to managing Local Green Space designations or enhancing them.
- Priority 9 – although Policy NP/EN2 does not specifically refer to increasing the extent and improving the quality of wetland and the floodplain, we agree that this Policy could lead to a positive effect in this respect.
- Priority 10 – policies NP/EN1 and NP/EN2 do not specifically improve ecological quality of rivers to support biodiversity but could lead to a positive effect in this respect.
- Priority 11 – we agree this is not applicable to the Sandhurst Neighbourhood area.
- Priority 12 – we agree that by complying with the requirements of the Thames Basin Heaths Special Protection Area this could lead to an improvement in heathland habitats, although the designation of LGS 6 and LGS 7 does not specifically achieve this.
- Priority 13 – we agree that Policy NP/EN2 could lead to an increase in the overall land areas dedicated to nature and wildlife.

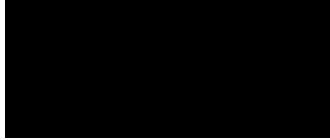
Overall, we consider that the Neighbourhood Plan, where relevant, will take account of the Berkshire Local Nature Recovery Strategy under section 104 of the Environment Act 2021.

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Please do not hesitate to contact the Development Plans Team if you require any clarification on the points raised (email: development.plan@bracknell-forest.gov.uk).

Yours sincerely



Jo Male
Assistant Director: Planning

Appendix 1 – Comments in relation to basic conditions
Appendix 2 – Comments not relating to basic conditions

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Appendix 1 – BFC comments in relation to basic conditions

Where comments relate to the ‘basic conditions’ these are:

- A) is appropriate having regard to national policy and advice contained in guidance
- D) contributes to the achievement of sustainable development
- Ea) would not have the effect of preventing development from taking place which:
 - o is proposed in the development plan for the area of the authority (or any part of that area), and
 - o if it took place, would provide housing
- F) does not breach and is otherwise compatible with retained EU obligations
- Fa) has complied with any environmental outcomes report requirements, where those apply
- G) meets and complies with prescribed conditions and matters e.g. whether or not it has a significant effect on habitats sites.

Note, B) & C) are not referred to, as they only apply to Neighbourhood Development Orders.

Bold underlined text for additions; ~~**bold strikethrough**~~ for deletion.

Comments on the Submission Sandhurst Neighbourhood Plan

Policy/ Para. No	Basic condition	Comment
Map 1 (page 7)	A	Whilst this map is being used to illustrate the wider context and the fact that the Town Council boundary is the same as the designated Sandhurst Neighbourhood Area boundary, it would be helpful if the heading and caption reflected this to ensure it is clear to users of the Plan what the designated Neighbourhood Area is. The map is not sufficiently clear since there is no legend on the key to show that the purple line is the Neighbourhood Area and Town Council boundary. It is also missing key information including OS disclaimer and north point. The PPG ‘Plan making’ states that the “policies map should illustrate geographically the policies in the plan and be reproduced from, or based, on an Ordnance Survey map” (para. 002). Further the NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041) say Plans should be clear and unambiguous.
Paragraph 1.1.8	F and G	Part of the paragraph states <i>‘BFC’s Strategic Environmental Assessment is included within NP Appendix 7. However, planning applications submitted to BFC for planning permission may be subject to the need for</i>

		<i>Environmental Screening and, where relevant, may be required to provide avoidance and mitigation measures.'</i> This does not accurately reflect national policy. If ' <i>the need for Environmental Screening</i> ' refers to the SEA Regulations, this is not correct. The SEA Regulations apply only to Plans and Programmes – not planning applications.
Map 2 (page 11)	A	The map needs a legend/ key to state what the blue and red lines are, so it is clear where the RMA boundary applies, as required by the NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041).
Paragraph 3.3.5	A	The definition in this paragraph is not the same as the definition for 'starter homes' in the Appendix 6 Glossary, including inconsistencies such as 'may be able to afford' vs. 'should be able to afford'. The Plan is therefore not clear and unambiguous (as required by NPPF para. 16d and the PPG 'Neighbourhood Planning' para. 041).
NP/H1	A	Criterion a) is unclear how 'starter homes' will be secured as this is not a form of housing set out in the Bracknell Forest Local Plan (BFLP) nor in the NPPF. There is also an inconsistency between the policy wording and supporting text (para. 3.7.5). The policy refers to supporting starter (and affordable) homes where they meet other development plan policies, yet the supporting text caveats supporting starter homes where they are proposed within the settlement of Sandhurst. The Policy is therefore not clear and is ambiguous contrary to NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041).
NP/H1	A	Criterion c) would be better in the explanatory text and not in Policy NP/H1 itself since it cites other strategic policy and explanation but not as fully as Bracknell Forest Local Plan (BFLP) Policy LP32. This effectively duplicates strategic policy requirements of the development plan which the NPPF says plans should avoid (NPPF para. 16f).
NP/H1	A	The explanatory text should include guidance/ definition of what the Neighbourhood Plan considers 'appropriate density' – unclear if this is reference to NPPF paragraph 129 or something else such as local character. This is needed to ensure the policy is clear and unambiguous (as required by the NPPF para. 16d and PPG 'Neighbourhood Planning' para. 041).
Paragraph 3.7.5	A	Support is given for starter homes within the settlement of Sandhurst, but Policy NP/H1 provides wider support. The explanatory text therefore does not match the Policy and so is not clear and unambiguous (as required by NPPF para. 16d and the PPG 'Neighbourhood Planning' para. 041).
NP/H2	A	It is unclear what this policy adds over and above BFLP policies, especially as the Development Plan needs to be read as a whole (NPPF para. 2), serve a clear purpose and avoid unnecessary duplication (NPPF para. 16f). Recommend policy is deleted.
NP/H2	A	If the Policy is retained, it should include wording explaining where the inset map of the settlement boundary can be found. We suggest the policy wording is amended as follows:

		“Proposals for new development will be directed towards locations within the settlement boundary <u>as shown on Inset Map 7 in Section 12.</u> Development within...”
Paragraph 4.2.2	F and G	Part v) - the sentence is not entirely correct. It should read “Where within 400m of the TBH SPA there is a general presumption against new <u>a net increase in</u> residential development.” As currently worded, this is incompatible with EU Obligations.
NP/D1	A and D	Given this policy applies to the whole Neighbourhood Plan area, BFC has concerns about the restrictive nature of the second part of the policy. The objective box refers to the aim to ‘limit the height of buildings to coincide with the current architectural character and atmosphere of the area’ and the introductory text in para. 4.2.3 says the Neighbourhood Plan supports the design intentions of the Sandhurst Character Area Sandhurst Study, Chapter 2 (N.B. this is from BFC’s Character Area Assessments SPD, 2010). However, the SPD selected key areas in Sandhurst. Whilst the SPD notes in several of the identified areas that the existing building heights are 1-2 storeys, it does not recommend restricting the height of development. Indeed, one recommendation is that <i>“higher density development may be appropriate along Yorktown Road”</i>. As such, there has been little evidence presented to justify a blanket restriction/lack of support for proposals resulting in buildings over 3 storeys. The NPPF is clear that all policies should be underpinned by relevant and up-to-date evidence (para. 32). We previously advised that if there are certain areas characterised by bungalows for example, these areas could be identified and a boundary drawn on the Neighbourhood Plan policies map so that the policy could apply to these areas. BFC is of the view that the Policy may unduly restrict development, by for example, preventing apartments/flats and some commercial buildings, and result in less effective use of land in settlements. Indeed, it could possibly prevent the development of apartments/flats, which seemingly conflicts with the Neighbourhood Plan ambition of supporting starter homes and appropriate densities (Policy NP/H1). The second part of the policy is considered contrary to the ambitions of national policy (NPPF chapter 11) which states that planning policies should promote an effective use of land and achieve appropriate densities. Para. 135c) explicitly states that planning policies should ensure developments <i>“are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)”</i>. NPPF para. 125e states that planning policies and decisions should <i>“support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions – including mansard roofs – where the development would be consistent with the prevailing form of neighbouring properties and the overall street scene...”</i>.

		Further, the General Permitted Development Order allows for up to two additional floors on purpose built detached block of flats (subject to conditions) via a Class A Prior Approval application. As such, this policy is not considered to meet basic conditions A or D.
Paragraph 4.3.4	A	The supporting text takes a different stance to Policy NP/D1 stating that upward extensions are “supported providing that such extensions are sympathetic to local character and history...” whereas the Policy states that “developments of more than three storeys will generally not be supported.” It should be evident how a decision maker should react to development proposals by policies being clear and unambiguous (as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ para. 041).
NP/D2	A	The Policy lacks clarity on whether it applies to: • the settlement or countryside • greenfield sites regardless of their location if an infill, and gardens regardless of their location (which are classified as greenfield within the settlement) • householder extensions. If the policy simply applies to land within the settlement, then the Policy should make reference to inset map 7 to be clear where it applies. As currently worded, the policy does not meet the requirement to be clear and unambiguous (as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ para. 041).
NP/D2	A	Some of the criteria do not make sense from the initial policy wording ‘will only be supported where...’ e.g. d, e, f, g, k, l, m and n. The policy does not meet the requirement to be clear and unambiguous (as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ para. 041).
NP/D2	A	Criterion b) - it is unclear what is meant by ‘landscape features’. The term should be defined in the explanatory text or deleted. The policy does not meet the requirement to be clear and unambiguous (as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ para. 041).
NP/D2	A	Criterion e) - it is unclear what a ‘modified development’ is and how it fits with the scope of the Policy as set out above. The policy does not meet the requirement to be clear and unambiguous (as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ para. 041).
NP/D2	A	Criterion j) - ‘landscape value’ is a term that usually refers to wider public value and is not synonymous with residential gardens. In order to be applied consistently by a decision maker, it should be defined in the explanatory text or deleted. The policy does not meet the requirement to be clear and unambiguous (as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ para. 041).
NP/D2	A	Criterion n) - only ‘encourages’ the use of SUDS in areas at risk of flooding. This is contrary to NPPF para. 181c which requires the incorporation of SUDS unless there is clear evidence that it would be inappropriate, and strategic BFLP Policies LP27 ‘Climate change’ which requires a proactive approach to mitigating climate change risks including the incorporation of SUDS and LP33 ‘Flood risk’ which only permits development in areas at risk

		of flooding subject to certain criteria. NPPF para. 30 (footnote 17) states that policies should be in conformity with strategic policies in the development plan.
NP/D3	A	This policy seems to confuse different heritage concepts and uses vague terms that could ultimately result in harm. Listed buildings are covered by statute and are considered in a separate way to locally listed buildings. Locally listed and listed buildings have different protection levels, so should not be confused. As presented the policy dilutes the significance of heritage assets. Whilst the first part of the policy seems to be aimed at protecting the setting of heritage assets, the terminology used is for conservation areas and not that for listed buildings. Instead, the Policy should be requiring applicants to demonstrate how they avoid harm to the significance of its rural setting. Paragraph 213 of the NPPF is clear that substantial harm to grade II* listed buildings should be wholly exceptional. The use of the terms 'nearby sites' and 'nearby areas' in the policy are vague and confusing. BFC is concerned by the use of the term "semi-rural" in the second part of the policy (and paragraph 4.3.7) when the listed building in question is within the countryside (as shown on the Neighbourhood Plan's own inset map 7). The reference to "semi-rural" character is inappropriate in this context and could inadvertently promote development which erodes the very qualities that contribute to significance. The policy also refers to securing views of the church spire. However, the assessment of setting is a far wider concept than visual views alone. Consideration should include both views towards and from the church/asset, alongside the broader physical and experiential qualities of the setting. Historic England's Guidance 'Setting of Heritage Assets' (GPA3, page 11) contains a checklist of the asset's physical surroundings and experiential qualities of the setting. These include considerations such as topography, aspect, history and degree of change over time, tranquillity, remoteness, 'wildness', visual dominance, prominence or role as a focal point, views from, towards, though, across and including the asset, intentional intervisibility with other historic and natural features. BFC considers that as currently worded the policy will undermine the policy protection that already exists from strategic BFLP Policy LP29, and that the Policy is not consistent with the NPPF Chapter 16, in particular paragraphs 207 and 208. It therefore fails to meet basic condition 'A'.
NP/D4	A	Criterion 3) - this should be clarified so it applies to mature and important trees or significant hedgerows (as per earlier in the policy), and not all trees. It would also be beneficial to link the criteria to native trees as is done elsewhere in the policy. The aim of the criterion does not seek betterment of existing but rather focuses on replacement which is not consistent with NPPF para. 136 which seeks to "ensure the right trees are planted in the right places". The PPG 'natural environment' refers to the loss of ancient or veteran trees; not all trees (para. 034).

NP/D4	A	Criterion 4) - the wording uses 'could' rather than 'would' be affected by proposals, which is not clear and unambiguous as required by NPPF para. 16d and the PPG 'Neighbourhood Planning' para. 041.
NP/D4	A	Criterion 6) Whilst BFC appreciates the purpose of the criteria, it requires further detail in the policy/ explanatory text to establish if there is a time limit to when this applies, otherwise it will not be evident how a decision maker should react to proposals (as required by NPPF para. 16d).
NP/D4	A and D	Criterion 7) There is not the necessary evidence to justify the inclusion of this criterion. The policy appears to be based on information in the Bristol Planning Obligations Supplementary Planning Document 2012, but the context and evidence for that information is unclear and not automatically applicable to Sandhurst. It is not appropriate to copy information from a different LPAs SPD and add it as policy wording for an area in Bracknell Forest with no justification or evidence. BFC is of the view that there is no legal framework for it and the replacement requirements are very onerous. BFC does not have any similar local evidence to justify the criteria. The NPPF is clear that all policies should be underpinned by relevant and up-to-date evidence (para. 32), and the PPG 'Neighbourhood Planning' states that "The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan..." (para. 040). The requirement for 'any tree lost to development is of a significant size' is very broad. As currently worded the loss of any trees (even non-native species like leylandi) or proposals of any type/ scale that require planning permission will need to provide replacement trees. It is unclear if the policy requirements are in addition to those required by Biodiversity Net Gain, and how Sandhurst Town Council would be able to secure a financial contribution or in-kind works. The criterion should be deleted since the onerous requirements may prevent development coming forward in the most sustainable areas in Sandhurst contrary to basic condition 'D' (contributes to the achievement of sustainable development). It is also contrary to basic condition 'A' given it goes beyond national policy set out in para. 136 of the NPPF nor is it underpinned by robust and up-to-date evidence (NPPF para. 32).
Paragraph 4.3.10	A	The term 'sustainable replacement trees' as defined in this paragraph is not precise enough for it to be evident how a decision maker should react to development proposals. It is unclear if it is the replanting of the same species, or if any size/ number of any trees can be planted to meet the definition. The policy does not meet the requirement to be clear and unambiguous as set out in the NPPF para. 16d and the PPG 'Neighbourhood Planning' para. 041.
Paragraph 5.4 Map 5	A	Whilst this map is being used to illustrate the wider context, it does not show the designated Sandhurst Neighbourhood Area boundary, and so it cannot be used for decision making which is implied by Policy NP/EN4 criterion 3. The map is not of sufficient clarity or quality to be used for decision making and is missing key information including an OS disclaimer. The PPG 'Plan making' states that the "policies map should illustrate geographically the policies in the plan and be reproduced from, or based, an Ordnance Survey map" (para. 002).

		Further the NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041) say Plans should be clear and unambiguous. It also displays a confused image of public footpaths some of which are Public Rights of Way (PRoW) and many that are not. These should be clearly defined and highlighted using official colours i.e. yellow for PRoW footpaths, blue for PROW bridleways, purple for restricted byways and red for any byways (BOATS). Typo: 'Backwater' instead of 'Blackwater'.
NP/EN1	A	The policy wording is almost a direct copy of criteria 2 and 3 wording of BFLP Policy LP36 'Landscape character'. It therefore does not 'enhance' BFLP Policies LP35, LP47 or LP49 as stated in para. 5.4.8. The Development Plan needs to be read as a whole (NPPF para. 2) and policies should avoid unnecessary duplication (NPPF para. 16f), so it is unclear what the value of the policy is. Further, the title 'Development in the Blackwater Valley Corridor and the Crowthorne/Sandhurst Heathland' does not reflect the policy content, since no locally specific Sandhurst detail has been provided. The landscape character areas which relate to the Neighbourhood Plan area (maps B1 'Crowthorne/ Sandhurst Heathland Mosaic' and E1 'Blackwater River Valley' set out in Appendix 5 of the BFLP) extend beyond the designated Neighbourhood Area (i.e. include parts of Crowthorne). The Policy as written therefore covers areas outside the designated Neighbourhood Area since no inset maps or other locally distinctive information is included in the Neighbourhood Plan. The PPG 'Neighbourhood Planning' is clear that neighbourhood plans should "be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared." (paragraph 041). The NPPF para. 16d and PPG 'Neighbourhood Planning' (para. 041) say that policies should be clearly written and unambiguous.
NP/EN1	A	To ensure it is evident how a decision maker should react to development proposals, Map 4 should be referred to within the policy wording so that the geographical area to which the policy applies is clear and unambiguous (as required by NPPF para. 16d and the PPG 'Neighbourhood Planning' para. 041). Suggest the policy wording is amended as follows: "a) Development proposals within the area defined on Map 4, will only be permitted where....
NP/EN2	A	To ensure it is evident how a decision maker should react to development proposals, Map 4 should be referred to within the policy wording so that the geographical area to which the policy applies is clear and unambiguous (as required by NPPF para. 16d and the PPG 'Neighbourhood Planning' para. 041). Suggest the policy wording is amended as follows:

		“1) Development within the Blackwater Valley Corridor (as defined on Map 4) would need to”
NP/EN2	A	Criterion 1) is considered restrictive and ambiguous since it is not clear how applicants would ‘demonstrate’ they have met the criterion or how a decision maker should react to development proposals. The wording ‘no adverse impact’ is restrictive. The explanatory text does not provide guidance on the implementation of the policy, nor does it define what is meant by ‘wildlife’. As such, it is assumed this term includes all species including invasive non-native species and native nuisance species. The policy does not meet the requirement to be clear and unambiguous (NPPF para. 16d and the PPG ‘Neighbourhood Planning’ para. 041).
NP/EN2	A	BFC is concerned that the policy goes beyond the remit of the planning process. Wildlife Sites are assessed and defined by TVERC. Development proposals cannot designate or increase their size as required in Criterion 2. As such part of the policy is beyond the scope of a Neighbourhood Plan. Indeed TVERC states that <i>“Most local wildlife sites systems involve a panel of ecologists and others in the development of local criteria and the selection of the sites. Panels usually include a local government ecologist, an Natural England representative, the Local Wildlife Trust, the local environmental record centre and sometimes include a representative of local landowners and local naturalists.”</i> Guidance: statutory and non-statutory wildlife site designations Thames Valley Environmental Records Centre
NP/EN2	A	Criteria 2) a-d) The wording of the opportunities in the policy seems to say the same thing in several different ways. BFC considers this wording should not be in the policy itself but would be better as explanatory text. This is to ensure the policy is clear and unambiguous (as required by the NPPF para. 16d and the PPG ‘Neighbourhood Planning’ para. 041).
Paragraph 5.4.9	A	It is unclear how the Policy enhances and supports BFLP Policy LP30 since the Neighbourhood Plan does not set out opportunities to help deliver wider initiatives already established in strategic policy, such as Green Infrastructure. There is no local information in the Neighbourhood Plan on what this could look like, e.g. opportunities for improved connections between areas important for wildlife to align it to green infrastructure or a map that applicants and decision-makers could use. It is also unclear if it links to the LNRS. The policy and its supporting text does not meet the requirement to be clear and unambiguous (as required by the NPPF para. 16d and the PPG ‘Neighbourhood Planning’ para. 041).
NP/EN3	A	Criterion 1) is unclear what the following terms mean since they are not defined in any explanatory text: • ‘rural/semi-rural’– unclear if this is a reference to the various landscape character attributes or something different. Also, please see BFC comments under Policy NP/D3 regarding concern of the term ‘semi-rural’. • ‘informal recreation’ and ‘associated recreation and related facilities’ – unclear if this includes incidental development such as residential accommodation. If it does, the explanatory text should reference the BFLP Policy LP32 ‘Thames Basin Heaths Special Protection Area’.

		The 'defined areas' need to be set out in the explanatory text (is this referring to all three areas?). To ensure it is evident how a decision maker should react to development proposals, the maps in Section 12 should be referred to in the Policy so the geographical area to which the policy applies is clear and unambiguous (as required by the NPPF para. 16d and the PPG 'Neighbourhood Planning' para. 041). Suggest the policy wording is amended as follows: "1) Development within the defined areas (<u>as shown on Maps 10, 11 and 16</u>) will be given.....". "2) Memorial Park (<u>as defined on Map 11</u>):.... "2) Horseshoe Lake (<u>as defined on Map 16</u>):.... "3) Grove Lake (<u>as defined on Map 10</u>):.... N.B. Map 16 shows different information to Maps 10 and 11 and does not have a red-line boundary around it.
NP/EN3	A	Criterion 2c) - the second sentence relating to SUDS should not be policy. It should form explanatory text explaining how the policy criteria should be implemented. It cross references the BFLP Local Plan (see comment in table 2 about consistency of terminology). The NPPF para. 16f states that policies should avoid unnecessary duplication.
NP/EN3	A	Criterion 2d) - the wording does not read correctly. Suggest the addition of a word for clarity to accord with NPPF para. 16d which requires policies to be clearly written and unambiguous: "Appropriate levels of parking are available to avoid overspill parking causing detriment to neighbour amenity or the amenity of other <u>users</u> of the Memorial Park."
NP/EN3	A	The numbering of the Policy needs amending (there are two 'criteria 2') to ensure the policy is clear and unambiguous (as required by the NPPF para. 16d and the PPG 'Neighbourhood Planning' para. 041).
NP/EN3	D	Criterion 2) The Horseshoe Lake requirements seem to conflict with each other. Unclear how it is possible to enhance recreation and facilities whilst also not impacting upon landscape/ conservation interest. It is therefore unclear how this policy requirement contributes to the achievement of sustainable development required by basic condition 'D'.
NP/EN4	A	The policy does not seem to be accompanied by an inset map showing the existing footpaths in the Blackwater Valley within the Sandhurst Neighbourhood Area that the policy would apply to. Map 5 (page 31) is not of sufficient quality to be relied upon in decision making and does not show the designated Sandhurst Neighbourhood Area. The PPG 'Neighbourhood Planning' (para. 041) and NPPF para. 16d require policies to be clear and unambiguous.
NP/EN4	A	Criterion 2) - the term 'countryside enjoyment' is not precise and therefore it is not evident how a decision maker should react to development proposals. The PPG 'Neighbourhood Planning' (para. 041) and NPPF para. 16d require policies to be clear and unambiguous. The term should be defined in the explanatory text if the criteria is kept.

NP/EN4	A	Criterion 3) the term 'Sandhurst boundary' should be more precise so it is clear which land it relates to e.g. 'Sandhurst Neighbourhood Area'. The PPG 'Neighbourhood Planning' (para. 041) and NPPF para. 16d require policies to be clear and unambiguous.
NP/EN5	A	As currently worded, the policy simply designates the Local Green Spaces (LGS) and so it is not evident how a decision maker should react to development proposals (as required by NPPF para. 16d). It is also unclear to users of the Plan where they can find the inset maps containing LGS1 to LGS10. Suggest the following wording is added to the Policy: "The following areas as defined <u>shown on the inset maps in Section 12</u>, are designated as Local Green Space." Underneath the list of local green spaces add: <u>"Development proposals within the identified Local Green Spaces will be assessed in accordance with relevant national planning policy and only supported in very special circumstances."</u> The Council is supportive of proposed LGSs 1 to 5 and 8 to 10. Comments on LGS6 and LGS7 are set out below.
NP/EN5	A	LGS 6 and LGS 7 – BFC considers that these proposed LGSs both individually and combined do not accord with the NPPF (para. 107) or the PPG (Open space, sports and recreation facilities, public rights of way and local green space - GOV.UK). Para. 107a) Although there is no precise definition of 'close proximity', it is usually interpreted as meaning adjacent or easy walking distance of the community to which the Neighbourhood Plan covers (PPG 'Open space, sports and recreation facilities, public rights of way and local green space' para. 014). Large tracts of LGS 6 and LGS 7 are not close to the settlement boundary of Sandhurst, and in the case of LGS 7, a 1km straight-line distance away from the nearest part of the Sandhurst settlement boundary. The evidence of visitor numbers for Horseshoe Lake is not considered to demonstrate the LGS is close to the area it serves, but a reflection of the popularity of the SANG. Most of the LGS proposed is not supported by data since it is privately owned countryside. Para. 107b) Only a small amount of the proposed designation of LGS 6 is SANG, and none of LGS 7. The vast majority of the proposed area is privately owned countryside with no public access. Whilst it is appreciated that the community value undeveloped countryside, it is difficult to conclude that the ambient rural feel is the main attraction to visitors (given the range of facilities on offer at Horseshoe Lake itself), and BFC disagrees with the

		statement that future residential development of this area would inevitably lead to an increase in visitors to the TBH SPA itself (as stated in para. 11.2.4 of Appendix 4). This is because any net increase in housing would be subject to HRA and only be permitted if mitigation allowed a conclusion of no significant effect on the integrity of the SPA. Para. 107c) Consideration of whether the green space is local in character and not an extensive tract of land suggests spaces within a locality, rather than, for example, extensive green areas in the countryside around a settlement. The areas proposed for designation are south and west of the settlement area, adjacent to each other and total circa 44ha of land. Whilst it is stated in the 'Local Green Space Evidence' Appendix 4 in para. 11.4.2 that the proposed LGSs are well below the size of designations of a similar quality of land elsewhere in England, the context of those designations is not provided (e.g. it might be a park in the middle of a settlement surrounded by the community it serves). Given their location in relation to the settlement, LGSs 6 and 7 are considered extensive tracts of countryside. The PPG sets out that blanket areas of countryside adjacent to settlements are not appropriate for LGS designation. The policy does not meet basic condition 'A' and LGS 6 and 7 (and their associated maps in Section 12) should be deleted from the Neighbourhood Plan. Objective x) and the objective box on page 32 should be amended to remove reference to protecting the existing green spaces "surrounding the settlement". Further, Horseshoe Lake is a SANG and is therefore maintained and funded for this purpose for 125 years. It is therefore of limited benefit designating it as a LGS. Should it be suggested during the course of the Examination that the proposed extent of LGS6 and LGS7 be materially amended to satisfy the national tests, the Council may review its position.
Paragraph 6.1.3	A	It would be helpful if the residents' questionnaire findings about the number of cars being higher than average was compared to the 2021 Census data to establish if the findings are supported with data (since although cars were not used as much during Covid restrictions, the statistics of ownership probably remained accurate). Appendix 1 does not cite the source of the car ownership information. This clarification is important because car ownership information forms part of the evidence for Policy NP/T3. NPPF para. 32 states that all policies should be underpinned by relevant and up-to-date evidence and the PPG 'Neighbourhood Planning' (para. 040) states "Proportionate, robust evidence should support the choices made and the approach taken."
Paragraph 6.1.5	A	The 17,000 vehicles per day cited is (according to Appendix 1, 2.6.5) based on older data, and notes "<i>traffic flows on Sandhurst's roads appears to have only shown a marginal increase in recent years.</i>" It is therefore necessary for the Neighbourhood Plan to set out how congestion is defined, and whether this has been measured or modelled.

		Further it is unclear how the conclusions relating to nearby developments “ <i>adding to traffic currently using Yorktown Road</i> ” have been drawn. For example, if the Transport Assessments for these developments were examined to determine the predicted impact on Yorktown Road. Being clear on the evidence the Neighbourhood Plan is based on is important, since this paragraph forms the justification for Policy NP/T1. NPPF para. 32 states that all policies should be underpinned by relevant and up-to-date evidence and the PPG ‘Neighbourhood Planning’ (para. 040) states “Proportionate, robust evidence should support the choices made and the approach taken.”
Paragraph 6.1.6	A	This paragraph only refers to ‘traffic’ in parts a – d and ignores other modes of travel. This is not consistent with strategic BFLP Policies LP25 ‘Transport principles’ (criteria i), LP26 ‘Transport infrastructure provision’ (criteria 1i), LP27 ‘Climate change’ (criteria 1i), or NPPF paragraphs 110, 115 a) and 117 a). It is also contrary to national guidance set out in PPG ‘Travel Plans, Transport Assessments and Statements’. NPPF para. 30 (footnote 17) requires neighbourhood plans to be in general conformity with the strategic policies contained in the development plan.
NP/T1	A	As above, Policy NP/T1 ignores other modes of travel which is not consistent with strategic BFLP Policies LP25 ‘Transport principles’ (criteria i), LP26 ‘Transport infrastructure provision’ (criteria 1i), LP27 ‘Climate change’ (criteria 1i), or NPPF paragraphs 110, 115 a) and 117 a). It is also contrary to national guidance set out in PPG ‘Travel Plans, Transport Assessments and Statements’. NPPF para. 30 (footnote 17) requires neighbourhood plans to be in general conformity with the strategic policies contained in the development plan.
NP/T2	A	It is unclear what the Neighbourhood Plan means by medium and large development, i.e. the number of units for new medium/ large residential sites, and floorspace for commercial development (sqm). The definitions are not clearly established in the Appendix 6 Glossary either (see comments below in relation to the Glossary). This means Policy NP/T2 does not meet the requirement to be clear and unambiguous (NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041)).
Paragraph 6.2.1	A	The paragraph presents data about car ownership based on questionnaires, particularly highlighting 3 and 4 bedroom properties, but fails to note that car ownership of 3 or more vehicles in Sandhurst is a small proportion, as set out in Appendix 1 paragraph 2.4.1 iii). The latter states 3-car households as being 10% and ‘the remainder’ (circa 4% based on addition of the other figures) having four or more cars; i.e. circa 86% of households had fewer than 3 cars. It is therefore not considered that the Policy is based on relevant and up-to-date evidence as required by NPPF para. 32, and PPG ‘Neighbourhood Planning’ (para. 040) which states “Proportionate, robust evidence should support the choices made and the approach taken.”
Paragraph 6.2.7 / 6.2.8	A	These paragraphs have selected only part of national policy (Para. 112 c) and d), but not a), b) or e)), and so the drafting of NP/T3 has not had regard to national policy as required by basic condition ‘A’.
Paragraph 6.2.11	A	Whilst the development plan should be read as a whole (NPPF para. 2), the BFLP does not establish parking standards in policy. BFLP para. 19.12 states that “all relevant proposals should have regard to BFC’s current

		Parking Standards Supplementary Planning Document which will be used as guidance in the determination of planning applications.” The Parking Standards SPD is subject to change (indeed a new version was adopted in June 2026), and with the forthcoming new planning system, parking standards may be set in other documents in the future. Using a mix of standards/hybrid approach to parking in Sandhurst where some development proposals will need to use the Neighbourhood Plan, but others a different document that may/may not align with the Neighbourhood Plan thresholds is not clear and unambiguous as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041).
NP/T3	A and Ea	In setting a higher standard for parking in Sandhurst than elsewhere in the borough, Policy NP/T3 does not have regard to NPPF para. 112. Sandhurst is predominantly more urban and accessible compared to many other areas of Bracknell Forest outside Bracknell town itself. Indeed, there are several regular bus routes and a halt-train station (as evidenced in Appendix 1). Whilst the Neighbourhood Plan is at pains to highlight high car ownership and usage, alternative options are available and policies to encourage sustainable transport options should be promoted ahead of simply increasing parking requirements. By having a higher parking standard than required by the BFC Parking Standards SPD for 3- and 4-bedroom properties, the policy would appear to actually promote the use of the private car over sustainable alternatives. This is contrary to NPPF paras. 109 e) and 111 b) & d), and para. 112 a) (which requires consideration of the accessibility of the development). This is particularly since only circa 14% of households in Sandhurst are identified as having 3 or more vehicles (the Neighbourhood Plan evidence set out in Appendix 1, para. 2.4.1.iii. shows the predominant ownership is 1 and 2 cars). In placing greater requirements for parking on small developments of up to four dwellings, the policy may make some of these developments unviable (particularly when combined with some other requirements set out in the Neighbourhood Plan) and therefore the policy would be contrary to basic condition ‘Ea’ (have the effect of preventing development from taking place... which would provide housing). Further, there is no background paper or robust up-to-date evidence to justify establishing separate higher parking standards for smaller residential schemes. For example, no survey has been undertaken of recent developments to determine if these have resulted in increased parking issues in and around the area in which they are located, or evaluation of transport assessments etc. The justification appears to primarily be based on resident survey responses and selective Census data. Therefore, the evidence does not justify a Sandhurst-specific departure from the borough-wide Parking Standards SPD. The PPG ‘Neighbourhood Planning’ is clear

		that “Proportionate, robust evidence should support the choices made and the approach taken” (para. 040) and the NPPF para. 32 says that policies should be underpinned by relevant up-to-date evidence.
NP/T3	A	The use of the terms ‘dwelling’ and ‘flats’ is unclear since flats are a type of dwelling. It is also not stated if the requirements are for ‘gross’ or ‘net’ dwellings. This means Policy NP/T3 does not meet the requirement to be clear and unambiguous (NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041)).
NP/T3	Ea	Part 2 of the Policy covers HMOs. BFC has recently adopted its updated Parking Standards SPD 2026 which includes a standard for HMOs. By setting a separate (higher) standard for HMOs in the Neighbourhood Plan this is likely to have the effect of preventing development that would provide housing from taking place contrary to basic condition ‘Ea’. See also comments made under paragraph 6.2.11 above.
NP/T3	F and G	As currently worded, the Policy does not meet basic condition ‘F’ or ‘G’. This is because it does not account for potential issues with a site being located near to the SPA. Suggest adding a sentence: <u>‘Proposals resulting in a net increase in public parking within 400 metres of the Thames Basin Heaths Special Protection Area will not be supported.’</u> This amendment would enable replacement dwellings within 400m of the SPA (i.e. no net increase in dwellings), but any net increase in car parking spaces would be required to be secured for that dwelling only (i.e. they are not available for the general public to park in).
Paragraph 6.2.14	F and G	Whilst this refers to BFLP Policy LP 32 it needs to be more specific. It could be amended to the suggested text above, or the suggested text could be added to the policy and the wording in 6.2.14 could remain.
Paragraph 6.2.17	A	This explanatory text appears to have the intention of further stretching the reach of Policy NP/T3 to include developments of five and over units if visitor parking cannot be accommodated within the development, but this is not explicitly stated in the policy wording. It is confusing to have a mix of different standards from different documents, and for the explanatory text to have different requirements to the Policy. It is therefore not evident how a decision maker should react to development proposals and the policy does not meet the requirement to be clear and unambiguous (NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041)).
Paragraph 6.7.2	A	The statement in this paragraph about restrictions to sustainable transport solutions is at odds with the NPPF requirements in paragraphs 109e, 115a and 115b.
NP/T4	A	Improvements to Sandhurst Railway Station are a matter for Network Rail and not linked to development proposals. It is unclear what development proposals the policy would apply to. Other aspirations should be clearly set out in a companion or annex, and it should be made clear that they will not form part of the development plan (PPG ‘Neighbourhood Planning’ para. 004). BFC also notes that although called ‘sustainable transport’, the policy only refers to pedestrian footpaths.

NP/C1	A	Criterion 1) sets out that support for indoor and outdoor sports pitches and play areas is only 'where a need has been demonstrated' however the explanatory text does not set out how this will be assessed. Unclear if it is based on BFC's latest evidence or something else. As such it is not evident how a decision maker should react to development proposals as required by NPPF para. 16d.
NP/C1	A	Criterion 2) - the tense of the criteria is not consistent with the rest of the policy 'would need to' rather than 'will need'. The term 'neighbouring residents' is imprecise and so it is unclear how the harm would be assessed. BFC suggest this should instead be "residential amenity". BFC also notes that this wording may conflict with aspects of BFLP Policy LP44 'Community facilities' criteria 1 (which requires consideration of more things than just neighbouring residents), and that in accordance with NPPF para. 31, the Neighbourhood Plan policy will take precedence over non-strategic policies where there is a conflict.
NP/C1	A	Criterion 5) - the reference to parking in this policy refers to meeting the requirements of BFLP policies rather than the Neighbourhood Plan. As set out in comments under Policy NP/T3, it is confusing to use a mix of different standards from different documents. The policy does not meet the requirement to be clear and unambiguous (NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041)).
NP/C1	A	Criteria 5 and 6) both refer to 'proposals impacting on...' but this has not been defined and so it is not evident how a decision maker should react to development proposals as required by NPPF para. 16d. This is not clear and is ambiguous contrary to NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041).
NP/C1	F and G	Criteria 5 and 6) This is incompatible with EU Obligations. If an <u>equivalent</u> number of car parking spaces are being provided nearby, this can occur within 400m of the SPA. However, proposals resulting in a <u>net increase</u> in public parking within 400 metres of the Thames Basin Heaths Special Protection Area will not be supported.
Paragraph 7.7.9	A	Reference to maps 12 and 13 should be in the policy itself so the geographical application of criteria 5 and 6 is clear and unambiguous as required by NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041).
NP/C2	A	The Policy wording is mostly a duplicate of BFLP Policy LP44 'Community facilities' (reordered), except for the omission of criteria 2i and 2ii of that policy. It is appreciated that if public houses and social clubs are of particular local importance, then the omission of those criteria may help their retention. However, criteria 1 a-c duplicates BFLP Policy LP44 criteria 1 wording. The Development Plan needs to be read as a whole (NPPF para. 2) and NPPF para. 16f says plans should avoid unnecessary duplication of policies. This part of the policy should be deleted, so the policy just covers the change of use/ redevelopment of public houses.
NP/C2	A	Criteria b) - although virtually a duplicate of BFLP Policy LP44 'Community facilities' it does not include the information in the footnotes of that policy which establish what is meant by 'actively and positively marketed' and 'reasonable commercial terms'. It is not evident how a decision maker should react to development proposals as required by NPPF para. 16d. These terms should be defined in explanatory text in paragraph 7.8.4.
NP/C2	A	Criterion 1) - the use of a full stop after a) but then the use of 'and' at the end of b) make it unclear whether all the parts need to be met or only some. This will need amending for clarity if the criterion is kept (see comment

		above about duplication of existing policy). The policy does not meet the requirement to be clear and unambiguous (NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041)).
Paragraph 7.8.4	A	In order for the definition set out in this paragraph to be clear and unambiguous as required by NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041) the Policy criteria should be renumbered, so the first part of the policy has a number to which part c) can be associated.
Paragraph 8.2.1	A	References to the CIL 123 List should be removed since the CIL Reg 123 was removed from the CIL Regulations in September 2019 (PPG 'Community Infrastructure Levy' (para. 017)). The infrastructure funding statement is regularly updated and so the reference here will become out of date very quickly (PPG 'Community Infrastructure Levy' para. 174). The text is therefore not consistent with national legislation or advice contained in guidance.
NP/C3	A	The only scheme listed in the policy that is likely to meet the CIL Regulation 122 requirements (of being directly related to the development) are the church and the school involving improved parking and drop off facilities. The use of Sandhurst Town Council's CIL receipt is more likely should a scheme to provide the desired parking provision come forward. The other aspirations should be clearly set out in a companion or annex, and it should be made clear that they will not form part of the development plan (PPG Neighbourhood Planning paragraph 004). BFC is also concerned by the term 'semi-rural' in criterion 1, since the area is countryside (see comments on Policy NP/D3).
NP/C4	A	It is unclear why this policy is in the Neighbourhood Plan. This is not a planning matter, nor is it within the Highway Authority's control to either surface or require surfacing of unadopted roads. Typo "SuDS drainage systems" which has been both written out and the acronym used. Suggest this policy is deleted or moved to a companion annex that does not form part of the development plan (PPG Neighbourhood Planning paragraph 004).
Paragraph 9.2.2	F and G	This paragraph and photo caption go beyond emphasising opportunities for making visual improvements to the area by providing encouragement for the redevelopment of the site but without an associated policy or allocation. In this location BFC would be concerned about a net increase in dwellings. This would need to be mitigated through the Thames Basin Heaths mitigation strategy (parking would not be an issue in this location as it does not lie within 400m of the SPA). This was not included in the SEA/HRA screening exercise and so has potential HRA/ SEA implications which have not been assessed. As such it is not considered to be consistent with basic conditions 'F' and 'G'.
NP/ERB1	A	The policy title is 'Retail' but is located under the Employment sub-section and not retail which is confusing. Further the policy objective is to encourage the redevelopment of units with poor architectural quality, whilst maintaining retail provision. The policy wording, as written, would not achieve this objective. The policy does not

		meet the requirement to be clear and unambiguous (NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041)).
NP/ERB1	A	Criterion 1) refers to both employment and/or retail. These are different planning terms and cover different uses for which local and national policy have different approaches. Reference to employment should be deleted. The policy is very restrictive meaning that changes of use to other uses (where permission is required, such as to Sui Generis uses) would be contrary to policy, even if they would support the vitality and viability of centres and be appropriate for the designated centre. Although not specified, the policy seems to apply across the whole Neighbourhood Area including designated local centres. As worded, this policy is not consistent with strategic BFLP Policy LP21 since it does not support proposals which may be consistent with the role and function of designated centres, or NPPF para. 90 which states that policies should promote town centres long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries. The NPPF (para. 30, footnote 17) requires neighbourhood plans to be in general conformity with the strategic policies contained in the development plan.
NP/ERB1	A	Criterion 2) is not precise enough. It is unclear which residential properties the policy is referring to (nearby, those above retail units, those within a certain distance for example). It is also unclear what is meant by 'excess traffic movement' and how this would be determined. It is not evident how a decision maker should react to development proposals as required by NPPF para. 16d. This is not considered to be clear and unambiguous as required by NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041).
NP/ERB1	A	Criteria 3 and 4) do not read correctly when read from the first line of the policy. Criteria 3 and 4 do not support hot food takeaways unless persistent vacancies exist, and then only with adequate parking provision. This is contrary to NPPF para. 97 which states that applications for hot food takeaway should be refused when they are within walking distance of schools or where there is evidence of other specific adverse impacts, but there is an exception for designated town centres. However, Policy ERB1 applies to all parts of the Neighbourhood Area including designated centres. Given hot food takeaways are not 'retail' or 'employment', either the term 'commercial' development or equivalent should be added to the policy title, or a new separate policy created. Further there is no explanatory text setting out what applicants need to provide to 'demonstrate genuine and reasonable attempts to let, lease or sell the related property'. It is not evident how a decision maker should react to development proposals as required by NPPF para. 16d. The policy does not meet the requirement to be clear and unambiguous (NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041)).
NP/ERB1	F and G	Criterion 4) breaches basic conditions 'F' and 'G' since the application of the policy is across the designated Neighbourhood Area. Suggest adding a sentence:

		<u>“Proposals resulting in a net increase in public parking within 400 metres of the Thames Basin Heaths Special Protection Area will not be supported.”</u>
Paragraph 9.3.8	A	There is no map showing the geographical extent of the requirement for ‘outlets located in or near to Yorktown Road developments’ which the Neighbourhood Plan considers are ‘in a sensitive location’ to justify the requirement for a transport statement. This paragraph seems to stretch the application of the policy further, however there is no mechanism for ensuring this is taken into consideration. This is not considered to be clear and unambiguous as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041).
NP/ECC1	A and D	Criterion 1a) whilst the orientation of rooms should be considered at the design stage, the policy and explanatory text do not take into account the risk of overheating. The NPPF is clear in paragraphs 161-162 that the risk of overheating from climate change impacts is something that plans should take a proactive approach to mitigating. BFC suggested encouraging green roofs since it is possible to have both this and solar panels on the same roof and create a microclimate for different species of plants. The policy has not fully considered the risk of climate change in relation to the policy requirements and so does not meet basic conditions ‘A’ and ‘D’.
Map 7 (page 71)	A	The map is not sufficiently clear in that there is no legend on the key to indicate what the blue and red lines are. It is ambiguous as to what the settlement boundary is. The neighbourhood area boundary is not clear. It also uses different terminology to policies such as H2 which refers to ‘defined settlement boundary’. The PPG ‘Plan making’ states that the “policies map should illustrate geographically the policies in the plan and be reproduced from, or based, an Ordnance Survey map” (para. 002). Since this map will aid the interpretation of policies, it should be clear and unambiguous as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041).
Map 8 (page 72)	A	Whilst this map is being used to illustrate the wider context, it does not show the designated Sandhurst Neighbourhood Area boundary. The source of the map is not clear and should be included. The PPG ‘Plan making’ states that the “policies map should illustrate geographically the policies in the plan and be reproduced from, or based on an Ordnance Survey map” (para. 002). Since this map will aid the interpretation of policies, it should be clear and unambiguous as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041).
Maps 10 and 11 (page 75)	A	These maps are not sufficiently clear as there is no legend on the key to indicate what the blue and red lines are. Since these maps will aid the interpretation of policies, they should be clear and unambiguous as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041).
Maps 12 and 13 (page 77 and 78)	A	These maps are not sufficiently clear as there is no legend on the key to indicate what the red lines are. Since these maps will aid the interpretation of policies, they should be clear and unambiguous as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041).

Map 14 (page 79)	A	Whilst this map is being used to illustrate the wider context, it does not show the designated Sandhurst Neighbourhood Area boundary. It appears that the map is an extract of a map from the Bracknell Forest Local Plan, if so, the source should be added. The information accompanying the map is lengthy going beyond what is needed for the Neighbourhood Plan. Suggest existing text is replaced with: <u>“As shown on Map 14, part of the Thames Basin Heaths Special Protection Area (TBH SPA) lies within the Sandhurst Neighbourhood Area. Designated in March 2005 for its lowland heathland, the TBH SPA supports significant populations of three ground-nesting birds: the Nightjar; Woodlark; and Dartford Warbler. The TBH SPA zones of influence (A and B) fall within the designated Neighbourhood Area and, as a result, the TBH SPA impacts planning decisions across the whole Neighbourhood Area. Mitigation may need to be provided. See Thames Basin Heaths Special Protection Area Supplementary Planning Document Bracknell Forest Council.”</u> It should be clear and unambiguous as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041).
Map 17 (page 82)	A	It is unclear what the purpose of this map is since there are no references to it in policy or the introduction/explanatory text. Plans should be clear and unambiguous as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041).
Maps LGS1 to LGS10 (pages 83 - 92)	A	These maps are not sufficiently clear as there is no legend on the key to indicate what the red lines are. Since these maps will aid the interpretation of policies, they should be clear and unambiguous as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041).
Appendix 1	A	This Appendix should not be in the Neighbourhood Plan. Whilst it is a useful evidence base document providing rationale for policies in the Neighbourhood Plan, it contains information that is not pursued through policy, and it is already out-of-date in some places. It may confuse users of the Neighbourhood Plan. The PPG is clear that “The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...” (para. 040 of the PPG ‘Neighbourhood Planning’). Including the whole document as an Appendix within the Neighbourhood Plan is contrary to this.
Appendix 2	A	This Appendix should not be in the Neighbourhood Plan. This information should be within the separate Consultation Statement which is a requirement of Regulation 15b. The PPG is clear that “The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...” (para. 040 of the PPG ‘Neighbourhood Planning’). Including the questionnaire results as an Appendix within the Neighbourhood Plan is contrary to this.

Appendix 3	A	This Appendix should not be in the Neighbourhood Plan. This information should be within the separate Consultation Statement which is a requirement of Regulation 15b. The PPG is clear that “The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...” (para. 040 of the PPG ‘Neighbourhood Planning’). Including the questionnaire results as an Appendix within the Neighbourhood Plan is contrary to this.
Appendix 4	A	Whilst this evidence sets out the rationale behind the LGS designations, BFC feels strongly that it should not be an Appendix to the Neighbourhood Plan. It is more appropriate as a separate evidence base document. The PPG is clear that “The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...” (para. 040 of the PPG ‘Neighbourhood Planning’). Including the whole document as an Appendix within the Neighbourhood Plan is contrary to this. This is particularly since once the Neighbourhood Plan has been made, only the boundaries of each LGS as shown on the maps in Section 12 and Policy NP/EN5 will be used in decision-making, and where the document has evolved over time there are inconsistencies between the Appendix and the Neighbourhood Plan itself, e.g. the objectives and policy within the Local Green Space Study (in Section 12) do not match that of the Neighbourhood Plan itself. The inclusion of this evidence base document as an appendix is unclear and ambiguous contrary to the PPG ‘Neighbourhood Planning’ (para. 041).
Appendix 5	A	This Appendix should not be in the Neighbourhood Plan. This information is already publicly available since it is an extract from an adopted BFC Supplementary Planning Document (SPD), which provides guidance on the implementation of other planning policies. Its inclusion elevates the SPD from guidance to the development plan, beyond the purpose for which it was produced. The PPG ‘Plan making’ (para. 008) is clear that SPDs cannot introduce new planning policies into the development plan. The SPD was used as evidence for some of the design policies in the Neighbourhood Plan, but it is not appropriate for it to form part of the Neighbourhood Plan itself.
Appendix 6	A	Several acronyms used in the Neighbourhood Plan are defined multiple times within the main document, as well as in the glossary. They should be defined once in the Neighbourhood Plan, and then the glossary used. The glossary is not considered to be clear and unambiguous as required by NPPF para. 16d and the PPG ‘Neighbourhood Planning’ (para. 041). It is unclear why the following terms are included since they either do not feature in the Neighbourhood Plan or are always written out in full and so do not need to be listed in the glossary: • AADT – Annual Average Daily Traffic • Class C1

		• Class C2 • Class C3 • Class C3 special • Class C4 • GTAA – Gypsy and Traveller Accommodation Assessment • FRA – Flood Risk Assessment • HLS – Housing Land Supply • SA – Sustainability Appraisal • SALP – Site Allocations Local Plan • SFRA – Strategic Flood Risk Assessment • SHELAA – Strategic Housing and Economic Land Availability Assessment • SHMA – Strategic Housing Market Assessment • SSSIs – Site of Special Scientific Interest (N.B. this should be SSSI). • SuDS – Sustainable Urban Drainage System (N.B. this should be changed to ‘Sustainable Drainage System’, taking out the ‘urban’) • TA – Transport Assessment Missing acronyms: • NHS – National Health Service • ASHP – Air Source Heat Pumps Misspelt definitions: • HRA should read ‘Habitats Regulations Assessments<u>s</u>’ • SSSIs should read SSSI It is unclear why the following definitions have been included since they are not used in the Sandhurst Neighbourhood Plan: • Outline planning permission • Full planning permission • Housing trajectory • Small sites These terms are included in the Glossary but do not match those provided in the Neighbourhood Plan itself: • Affordable housing
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		• Starter homes • Settlements It is unclear why the following definitions have been included in the glossary, since these terms are only used under the umbrella term 'housing for older people' or 'specialist older persons accommodation'. These terms should be consolidated both in the glossary and the Neighbourhood Plan for consistency: • Nursing/Care Homes • Retirement Homes Some of the terms are not consistent with national policy, or with the Neighbourhood Plan itself: • Brownfield sites – this is not just land that was for industrial or commercial purposes as set out in Annex 2 of the NPPF. • Section 106 agreement The following definitions would benefit from being more precise: • Full planning permission definition should include '...Full permissions will normally lapse after three years if they have not been implemented'. (Please see above querying its inclusion). • Housing Land Supply definition should reference the housing trajectory. '.....<u>as set out in the housing trajectory</u>'. • Medium sites definition should specify net dwellings: '<u>For residential uses and mixed-use scheme incorporating residential uses</u>, sites of less than 1 hectare but with 5 or more dwellings (<u>net</u>)' • The outline planning permission definition should be expanded to include: '...<u>The five reserved matters are layout, scale, appearance, landscaping and access.</u>' (Please see above querying its inclusion).
Appendix 7	A	The SEA/HRA Screening determination should not form part of the Neighbourhood Plan as an Appendix, but should form part of the evidence base for the Plan. Whilst it is needed in accordance with the requirement of Regulation 15e, it was based on an earlier version of the Neighbourhood Plan. This may be confusing to users of the Plan. Its inclusion is not clear and unambiguous as required by the NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041).
Appendix 8	A	The consultation statement is a requirement of Regulation 15b to help justify a plan proposal, but does not need to form part of the Neighbourhood Plan itself since it will not be used to support decision-making. Its inclusion as an appendix makes the Neighbourhood Plan unnecessarily long, and it refers to earlier policies that were either amended or not taken further. This may be confusing to users of the Plan. Its inclusion is not clear and unambiguous as required by the NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041).

Appendix 9	A	The basic condition statement is a requirement of Regulation 15b to help justify a plan proposal, but does not need to form part of the Neighbourhood Plan itself since it will not be used to support decision-making. Its inclusion as an appendix makes the Neighbourhood Plan unnecessarily long, and it refers to earlier policies that were either amended or not taken further. This may be confusing to users of the Plan. Its inclusion is not clear and unambiguous as required by the NPPF para. 16d and the PPG 'Neighbourhood Planning' (para. 041).
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Appendix 2 – BFC comments not relating to basic conditions

Policy/ Para. No	Suggestion	Comment
Whole Plan	Amendment	The Neighbourhood Plan does not consistently cite the Bracknell Forest Local Plan by name or its abbreviation BFLP. Currently a mix of terms are used, e.g. BFC Local Plan, BF Local Plan, current BFC Local Plan. Given that a new Local Plan may be produced during the life of the Neighbourhood Plan, the BFLP and its policies should be consistently cited. All BFLP Policies should be referenced as 'BFLP Policy LP xx'.
Whole Plan	Amendment	The policy criteria numbering is inconsistent. The numbering changes from alphabetical to numerical (sometimes a mix of both). A consistent approach throughout the document would make it more user-friendly.
Whole Plan	Amendment	All policies would benefit from having their introductory text above the related policy, rather than grouping all introductory text in sections. This would make the document more user-friendly.
Whole Plan	Amendment	All policies would benefit from having the explanatory text directly below explaining to users of the document, how each policy should be implemented. Comments on where extra explanation is needed has been picked up in comments on individual policies in Appendix 1.
Whole Plan	Amendment	There are several typos such as 'Basins' rather than 'Basin', 'Heath' rather than 'Heaths' and times when the acronym is incorrect 'THB SPA' rather than 'TBH SPA' (e.g. Policy NP/H1). All should be Thames Basin Heaths Special Protection Area . E.g. para. 6.1.10 has two typos of 'THB SPA', and para. 5.1.3 has a typo.
Whole Plan	Amendment	'Shepherd Meadows' is the correct term for this site. This is spelt differently in different sections of the various documents and should be amended.
Whole Plan	Amendment/ clarification	There are some objectives without a policy (e.g. xxxiii, xxxiv) and some objective boxes in the Plan contain additional wording to that listed in para. 1.3.2. Suggest that the objective reference is cited above each policy to ensure consistency. Some of the objectives also go beyond the scope of what a Neighbourhood Plan can control and are vague in terminology e.g. objective xvii) Yorktown Road is a classified through-road so it is not within the control of a Neighbourhood Plan to limit traffic, and the use of the terms 'usage' and 'other major roads' are not explained.
Background page 8	Amendment	The statement here is not reflected in the BFLP and is therefore misleading. Instead BFLP Policy LP36 brings the landscape character areas into policy and refers to the landscape character areas that cover areas outside defined settlements in the borough, including Sandhurst. Suggested change to wording: "The BFLP did not allocate any large or medium sites for housing within Sandhurst Town's boundary. The BFLP did, however, <u>through Policy LP36 bring the landscape character areas into policy and refers to the landscape character areas that cover areas outside defined settlements in the Borough, including Sandhurst.</u> recognise the overall beauty, benefit, accessibility and importance to the community of the countryside, river and lakes surrounding the settlement of Sandhurst."

Section 3	Suggestion	The title of this Section is at odds with others in the Neighbourhood Plan, and confusing to call it 'Bracknell Forest Council Local Plan (Housing)' when the section introduces new terms that do not exist in the BFLP. Suggest it is "Housing". Also see comment above about consistent reference to the BFLP.
Paragraph 3.1.2	Suggestion	The list in this paragraph is a mix of BFLP and SALP allocations. The latter are from over 10 years ago. This should be made clearer so that users know where to find this information.
Paragraph 3.1.4.	Amendment	"...Beaufort Park and Derby Field developments <u>allocations</u> ."
Para. 4.2 and 4.2.3	Amendment	The Character Area Assessments Supplementary Planning Document (SPD) should be referenced correctly and consistently.
Paragraph 4.3.1	Amendment	The tense needs reviewing. "... it would be the objective of the Neighbourhood Plan to reduce...". The Neighbourhood Plan needs to be clear if this is an objective, and if so, how the policy is addressing it.
NP/D2	Suggestion	Criterion m) This criterion would benefit from rewording to make sure it is more precise for decision-making as follows: "Front of dwelling parking should incorporate permeable surfacing to reduce discharge into existing highway drains <u>and other measures to ensure new accesses/ parking courts do not overload existing highway drains or alter overland flow routes.</u> "
Section 5	Suggestion	A detailed history of the Blackwater Valley has been provided in both Section 5.2.1 to 5.2.5, as well as in Appendix 4 'Local Green Space Study'. Its former designation plus references to documents/plans that no longer exist, confuses the message about its current importance to Sandhurst residents, with over 5 sides of background before the objective and policy. Paragraph 5.2.1 could be shortened to the first sentence and then added to paragraph 5.2.3. The long explanation in paragraph 5.2.2 is confusing because it is referencing historic documents and plans. It would be helpful if the Neighbourhood Plan succinctly focussed on its current extent and why it is so locally important and kept the detailed history in the background document(s).
Paragraph 5.1.3	Amendment	It is incorrect to say 'Ambarrow Court/Hill is also designated as a nature reserve.' Only Ambarrow Court is a designated Local Nature Reserve.
Map 4 (page 28)	Amendment/ clarification	The caption is overly lengthy and should just set out the what the map is showing and source. The caption contains background information which would be better as supporting text if this is deemed relevant. If this is intended to be alternative text, it should be added as alternative text.
Map 5 (page 31)	Amendment/ clarification	The map caption does not need to explain the legend, this should be self-explanatory from the legend itself. If this is intended to be alternative text it should be added as alternative text.
Paragraph 5.4.11	Amendment	Typo: the neighbourhood plan policy reference should match that of the Policy i.e. NP/EN3 not NP EN 3. The Policy also partially aligns to BFLP Policy LP45 'Play, open space and sports provision'.
NP/EN4	Amendment/ clarification	The Neighbourhood Plan confuses public footpaths and Public Rights of Way (PRoW). Whilst public footpaths can often describe PRoW, incorrect definition leads to a confusion over the legally protected routes and those

		used by the public often on other adopted routes. The 'three castles path' is mentioned in Policy NP/EN4 (and in several other parts of the Plan), but whilst most of the route follows public footpaths, and indeed sections of PROW, this is not for its entirety, and there are sections of permissive route through private land (e.g. Crown Estate). Whilst PROW are not determined through the planning application process, the consistent and correct use of terms will avoid confusion when using the Policy.
Paragraph 5.5.2	Deletion	This is information that should be in the Local Green Space background document since it is related to designating a LGS and is not needed for the implementation of Policy NP/EN5 (since any LGSs in the Neighbourhood Plan have already been through this process). Suggest paragraph is deleted.
Paragraph 6.1.4	Information/ clarification	The Census travel to work data was collected during Covid restrictions and so should not be relied upon (since restrictions affected journeys taken). The Neighbourhood Plan does not appear to have considered other journey purposes aside from work to give a broader picture. Appendix 1, para. 2.6.1, refers to 150,000 station entries/exits for approximately 8000 homes (suggesting 18.75 entries/ exits per dwelling). Walking and cycling do not appear to have been considered. It is unclear if the statement relating to 'high usage' is in relation to the national average or the borough average.
Paragraph 6.4.1	Information/ amendment	In this section (and Appendix 1) reference to the X94 bus service provided by White Bus has been omitted. This runs through the eastern part of Sandhurst including Yorktown Road. It has recently been improved and provides a key link to the local hospital. The Neighbourhood Plan is suggesting that there are limited alternatives to the car whilst also not citing all those that exist.
Paragraph 6.4.5	Information/ amendment	The bus service between Heatherwood and Frimley Park Hospitals also stops on Rackstraw Road (Evenlode Way) and at two stops on Yorktown Road (Devon Close, and College Town Shops). The Neighbourhood Plan is suggesting that there are limited alternatives to the car whilst also not citing all those that exist.
Paragraph 6.4.6	Amendment/ Clarification	It is not only local constraints that affects routes, but also funding. Suggested amendment to "...routes are determined by local restraints <u>and funding.</u>" The statement that "<i>Many roads, other than Crowthorne Road, Yorktown Road and the A3095 are too narrow to accommodate regular safe bus usage</i>" is not borne-out by evidence, such as measurement and comparison of road widths with the requirements set out in the national guidance Manual for Streets (1 and 2) and Planning for Buses in Urban Developments (CIHT 2018). This paragraph, along with others in its section, seems to be used as evidence for why high car ownership and use will prevail, and associated parking provision across the Neighbourhood Area is needed, rather than exploring more sustainable options.
Paragraph 6.4.11	Amendment	This paragraph also starts with a quote but does not complete it.
Section 7.5.1	Amendment/ clarification	It is unclear why this section on general retail is not in the 'Employment, Retail and Business' section, since it provides background to the criteria in Policy NP/ERB1. Suggest it is moved.

Objective box Page 56	Amendment/ clarification	One of the objectives is to support additional car parking “where such need has been identified”. However the policy does not address this and the Neighbourhood Plan does not have evidence setting out where the identified need for additional car parking is.
Objective box page 57	Amendment	The Objective of the Policy is to ‘preserve’ current public houses/social clubs, whereas the policy allows changes of use and loss of facilities. It also refers to their architectural value which is not then mentioned in the policy. The objective wording and/or policy wording should be revised.
Page 58 Section on ‘Community infrastructure’	Amendment	This section is inconsistent with the structure of the rest of the Plan, i.e. to have an entirely new Section that continues policy numbering and prefix from the previous section. This also does not match the contents page which shows it as part of the Community section.
Paragraph 8.3.4	Clarification	Part a) it would be helpful if a plan and design of this to which S106 monies could be requested, was included in the Neighbourhood Plan.
Paragraph 8.4.1	Amendment	Typo “...suitable SuDS drainage system ”. Needs to either be written out or use the acronym.
Paragraph 9.2.1	Clarification	The first sentence does not read correctly. Should be amended to read: “Residents were satisfied with the range of shops provided in Sandhurst...”
Paragraph 9.3.1	Amendment	The wording “Sandhurst Employment Area” is misleading, since as the paragraph goes on to say, there are two different designated Employment Areas.
Paragraph 10.1	Amendment	The second sentence does not read correctly, and it refers to BFLP Policy LP66 which should be BFLP Policy LP56 ‘Renewable and low carbon energy’.
Section 11	Amendment/ clarification	Whilst the list of references is helpful, it is not always clear which documents are being referred to e.g. Tree Strategy 2017. Full titles of documents should be used and ideally links to where they can be found provided.
Locally listed buildings (page 73)	Amendment	For clarity a map showing the location of the locally listed buildings (similar to Map 9) would be useful.
Appendix 1 Paragraph 2.2.4	Amendment	Care needs to be taken about which part of Ambarrow Court / Hill is being referred to. The title and some of the text refers to Ambarrow Court but the map shows Ambarrow Court and Hill. Ambarrow Hill is a site to the north of Ambarrow Court. Only Ambarrow Court is officially designated at Local Nature Reserve. Also see BFC’s comments in Appendix 1 about Sandhurst Neighbourhood Plan Appendix 1 not being included in the Plan itself.
Appendix 1 Paragraph 2.2.5	Amendment	Spelling mistake. The last sentence should read ‘The site is part of the Thames Valley Basin Heaths Special Protection Area and is a s Site of Special Scientific Interest. Also see BFC’s comments in Appendix 1 about Sandhurst Neighbourhood Plan Appendix 1 not being included in the Plan itself.

Appendix 1 Paragraph 2.2.7	Amendment	The reference to Edgbarrow/Wildmoor Heath may be recognised locally but the official names of the areas of the TBH SPA located in Sandhurst are the Broadmoor to Bagshot Woods and Heaths Site of Special Scientific Interest (SSSI) and the Sandhurst to Owlsmoor Bogs and Heaths (Wildmoor Heath) SSSI. Also see BFC's comments in Appendix 1 about Sandhurst Neighbourhood Plan Appendix 1 not being included in the Plan itself.
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