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From: [REDACTED] >
Sent: 01 July 2026 13:33
To: Development Plan
Subject: Representations to the Regulation 16 consultation on the Sandhurst Neighbourhood Plan 2026–2037 on behalf of Bloor Homes Ltd
Attachments: Appendix A - Site Boundary Plan.pdf; Appendix B - Local Green Space Review.pdf; Sandhurst Neighbourhood Plan - Response Form.pdf; Representations obo Bloor Homes Limited Regulation 16 Sandhurst Neighbourhood Plan 2026–2037 010726.pdf
Importance: High

CAUTION: This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Sir / Madam.

Thank you for the opportunity to comment on the Regulation 16 consultation on the Sandhurst Neighbourhood Plan 2026–2037 (the “Neighbourhood Plan”).

The attached, related Appendices and completed response form, are submitted on behalf of our client, Bloor Homes Limited, who have land interests at Land West of Wokingham Road and East of Lower Church Road, Sandhurst.

We previously responded to the Regulation 14 consultation and raised serious concerns that the draft Neighbourhood Plan did not meet the Basic Conditions set out in Schedule 4B of the Town and Country Planning Act 1990, as applied by Section 38A of the Planning and Compulsory Purchase Act 2004.

Having reviewed the Regulation 16 draft, those concerns remain and despite the submissions made by Sandhurst Neighbourhood Plan Steering Group on behalf of Sandhurst Town Council within “*Appendix 8 - Consultation Statement and appendices*” and “*Appendix 9 - Sandhurst Neighbourhood Plan Basic Conditions Statement*” comprising supporting documents to the Submission document, it is clear that the document does not accord with the required Basic Conditions. Unfortunately, those documents conflate various other policy and legal requirements with the necessary compliance to the Basic Conditions tests.

There is clearly a need for a wholesale review of the document in that context, and although we align with the Council’s wide ranging draft representations, fundamentally, our concerns are focused principally on **Policy NP/EN5 – Local Green Space** and the proposed designation of our client’s land within LGS 6.

Notably, Bracknell Forest Council once again raise concerns with the proposed Local Green Space designations, having done so at Regulation 14 stage, and those concerns have not been resolved. As we discuss below, supporting “*Appendix 4 (Regulation 15 version) - Local Green Space Study*” simply does not justify the proposed approach in the Submission Neighbourhood Plan.

We would be grateful if you could confirm safe receipt of these submissions and that they have been ‘duly lodged’.

Many thanks

[REDACTED]
[REDACTED]
Senior Director

Mobile: [REDACTED]
Office [REDACTED]



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Sandhurst Neighbourhood Plan 2022 – 2037

Submission consultation response form

What is this consultation about?

Bracknell Forest Council is undertaking a consultation on the submitted version of the Sandhurst Neighbourhood Plan. It has been prepared by Sandhurst Town Council (as the qualifying body). The public consultation runs from **10am Tuesday 19th May to 5pm Wednesday 1st July 2026**. Representations on the plan must be received during this period.

What is a neighbourhood plan?

The Localism Act 2011 introduced neighbourhood planning as a way of giving communities direct power to shape the vision and development in their local area. Neighbourhood plans sit alongside local plans. Both are used during the determination of planning applications.

Why we are consulting?

Sandhurst Town Council has submitted its neighbourhood plan to us. It meets the legislative requirements, and they have previously carried out methods of engagement and consultation on it. We are required to publicise the neighbourhood plan for consultation which lasts a minimum of 6 weeks. This is known as the Regulation 16 consultation (because Regulation 16 of the Neighbourhood Planning (General) Regulations (as amended) requires it).

What happens after the consultation?

The next stage after this Regulation 16 consultation closes is for an independent Examiner to assess the Sandhurst Neighbourhood Plan. All representations received during the consultation will be passed to the Examiner for consideration. The Examiner will assess whether the neighbourhood plan meets the basic conditions and other legislative requirements. The Examiner will also recommend if the plan should proceed to referendum or suggest any changes that need to be made to it before the referendum can take place.

After the examination we will use the Examiner's recommendations to decide if the neighbourhood plan complies with national requirements and arrange the referendum. Anyone registered to vote within the neighbourhood plan area boundary will have the opportunity to vote on whether or not the plan should be brought into force.

Where to view the neighbourhood plan:

The neighbourhood plan is available to view on the Council's website at:

<https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/neighbourhood-planning/sandhurst-town-neighbourhood-area>

For ease of reference, please note the 'Sandhurst Neighbourhood Plan' includes the following key information as appendices:

- Appendix 7 - The Strategic Environment Assessment and Habitats Regulations Assessment Screening Determination of the Sandhurst Neighbourhood Plan
- Appendix 8 - Consultation Statement
- Appendix 9 - Basic Conditions Statement

Hard copies of the plan are available for inspection during normal opening hours at:

- Bracknell Forest Council Offices, Time Square, Market Street, Bracknell RG12 1JD
- Sandhurst Town Council Offices, Sandhurst Memorial Park, Yorktown Road, Sandhurst GU47 9BJ
- Sandhurst Library, The Broadway, Sandhurst, GU47 9BL

How to make comments:

Please use this form to submit your comments to us on the Sandhurst Neighbourhood Plan. Please remember that the Examiner is only testing whether the Plan meets the 'Basic Conditions' and other relevant legal requirements set out in the Localism Act. Further information on the 'Basic Conditions' can be found in the 'Guide to Basic Conditions' on our website.

Your response should succinctly cover all the information, evidence and supporting information necessary to support/justify your representation. It should outline any suggested changes you think are necessary. It is unlikely that you will have another opportunity to make further comments.

Please complete parts A, B and C of this form.

All comments received during the consultation will be sent to the Examiner for consideration as part of the examination.

All comments must be submitted in writing to us before the consultation closes. The preferred method is through the online consultation portal, by using the 'survey' tab at the top of the consultation portal page. Alternatively, please email or post this completed response form to us.

- Online portal: <https://mylimehouse.bracknell-forest.gov.uk/kpse/event/C460B9AA-4EFC-4174-BA68-5829FBE87EC3>
- By email: development.plan@bracknell-forest.gov.uk
- By post: Sandhurst Neighborhood Plan, Planning Policy, Bracknell Forest Council, Time Square, Market Street, Bracknell RG12 1JD.

All comments must be received by 5pm Wednesday 1st July 2026. Please note that comments received after the deadline will not be considered.

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		██████████
Organisation (where relevant)	Bloor Homes Limited	Turley
On behalf of (where relevant)	c/o agent	Bloor Homes Limited
Address line 1		████████████████████
Address line 2		██████████
Town		██████████
County		██████████
Post code		██████████
Email address		██

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	SEE ATTACHED LETTER	Policy reference	SEE ATTACHED LETTER
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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 X

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).

SEE ATTACHED LETTER

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).

SEE ATTACHED LETTER

2. Representations – Comment 2

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

Paragraph number		Policy reference	
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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).

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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).

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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 **X**

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).

SEE ATTACHED LETTER

For the reasons set out in our representations, we consider that the Sandhurst Neighbourhood Plan, as submitted at Regulation 16, does not meet the Basic Conditions. In particular, serious concerns remain in respect of whether the Plan has proper regard to national policy, contributes to the achievement of sustainable development, and is in general conformity with the strategic policies of the development plan.

These concerns are not limited to matters of drafting or emphasis. They go to the substance of the Plan's approach, most notably in relation to the proposed Local Green Space designations, the failure to plan positively for housing delivery in a higher-order settlement, and the retention of a number of policies which duplicate or conflict with existing national and local policy.

The Town Council's Consultation Statement demonstrates that these matters were raised clearly at Regulation 14 stage, including by Bracknell Forest Council. However, the responses provided do not engage with the root of the issues identified. Instead, they rely on generalised assertions, the perceived motivations of representors, or the value of the wider landscape, rather than addressing whether the Plan's policies satisfy the specific tests set out in national policy and the Basic Conditions.

In particular, the continued designation of land under Policy NP/EN5, and the Town Council's Consultation Statement response which does not engage with the site-specific application of national policy or resolve the concerns raised by both the Local Planning Authority and landowners, demonstrates that there remain fundamental and unresolved issues of Basic Conditions compliance which cannot be addressed through written representations alone.

As a result, the Regulation 16 submission version of the Plan has not materially evolved to resolve these concerns. The unresolved disagreement between the Qualifying Body, the Local Planning Authority and our client, particularly in respect of the scale, justification and effect of the Local Green Space designations, is a material consideration for examination, on which **we formally request the opportunity to appear before the Examiner at Examination.**

Given the nature and significance of the issues raised, we do not consider that they can be adequately or fairly addressed through written representations alone. They involve matters of planning judgement, interpretation of national policy, and the application of the Basic Conditions which would benefit from detailed testing and clarification.

- 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 **X**

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

1st July 2026

Delivered via email development.plan@bracknell-forest.gov.uk

Planning Policy
Bracknell Forest Council
Time Square
Market Street
Bracknell
RG12 1JD

Dear Sir / Madam

SANDHURST NEIGHBOURHOOD PLAN 2026–2037 REGULATION 16 CONSULTATION

Thank you for the opportunity to comment on the Regulation 16 consultation on the Sandhurst Neighbourhood Plan 2026–2037 (the “Neighbourhood Plan”). These representations are submitted on behalf of our client, Bloor Homes Limited, who have land interests at Land West of Wokingham Road and East of Lower Church Road, Sandhurst (the “Site”). As previously confirmed to the Parish Council, our client is the owner of the land. A site location plan is included in **Appendix A** of these representations showing the extent of the revised scheme.

We previously responded to the Regulation 14 consultation and raised serious concerns that the draft Neighbourhood Plan did not meet the Basic Conditions set out in Schedule 4B of the Town and Country Planning Act 1990, as applied by Section 38A of the Planning and Compulsory Purchase Act 2004. Those concerns related in particular to whether:

- (a) Having regard to national policies and advice issued by the Secretary of State, it is appropriate to make the plan.*
- (d) The making of the plan contributes to the achievement of sustainable development.*
- (e) The making of the plan is in general conformity with the strategic policies contained in the development plan for the area.*

Having reviewed the Regulation 16 draft, those concerns remain and despite the submissions made by Sandhurst Neighbourhood Plan Steering Group on behalf of Sandhurst Town Council within “*Appendix 8 - Consultation Statement and appendices*” and “*Appendix 9 - Sandhurst Neighbourhood Plan Basic Conditions Statement*” comprising supporting documents to the Submission document, it is clear that the document does not accord with

Turley (Reading)

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[Redacted]

T [Redacted] turley.co.uk

the required Basic Conditions. Unfortunately, those documents conflate various other policy and legal requirements with the necessary compliance to the Basic Conditions tests.

Although there is much to be commended in the Regulation 16 plan, the failure to amend the previous iteration is problematic. Importantly, we note that Bracknell Forest Council, in their extensive draft submissions to this consultation¹, also note various Basic Conditions failures in this draft. There is clearly a need for a wholesale review of the document in that context, and although we align with the Council's wide ranging draft representations, fundamentally, our concerns are focused principally on **Policy NP/EN5 – Local Green Space** and the proposed designation of our client's land within LGS 6. Notably, Bracknell Forest Council once again raise concerns with the proposed Local Green Space designations, having done so at Regulation 14 stage, and those concerns have not been resolved. As we discuss below, supporting "*Appendix 4 (Regulation 15 version) - Local Green Space Study*" simply does not justify the proposed approach in the Submission Neighbourhood Plan.

In this context, these representations are once again supported by a Local Green Space Review Note prepared by the Environmental Dimension Partnership (EDP), which assesses the proposed inclusion of the site within Local Green Space 6 under Policy NP/EN5. The review concludes that the designation is not supported by a robust or objective assessment and that the site does not meet the tests for Local Green Space set out in paragraph 107 of the National Planning Policy Framework. The note is included in **Appendix B** of these representations.

These concerns sit within a wider context of acute housing need. The December 2024 National Planning Policy Framework and revised Standard Method have increased Bracknell Forest Council's housing need from 564 to 755 dwellings per annum, above the adopted Local Plan requirement of 615 dwellings per annum. This reinforces the need for sustainable settlements such as Sandhurst to play a meaningful role in housing delivery, particularly in the context of a need for a new Local Plan to be prepared in the coming years. As of today's date, a 20% buffer is to be applied to the current Local Plan requirements, in advance of a new Local Plan being prepared, in accordance with paragraph 78(c) of the NPPF.

Sandhurst is identified in the adopted Bracknell Forest Local Plan as a higher-order settlement. Despite this, housing delivery in Sandhurst has been limited and the Neighbourhood Plan does not allocate any housing sites in one of its more suitable settlements. This is a missed opportunity to plan positively for growth, shape development locally and help meet local and borough-wide needs in a sustainable way.

While we acknowledge the work undertaken to prepare the Neighbourhood Plan, the submitted Plan raises clear and unresolved issues against the Basic Conditions. The proposed Local Green Space designation affecting the Site is not justified; the Plan does not plan positively for housing delivery; and the Regulation 14 concerns have not been properly addressed. For these reasons, the Neighbourhood Plan should be considered at a public hearing as part of the independent examination process. **We formally request to appear at the appropriate hearing(s).**

Basic Conditions

As highlighted in our previous representations, the basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. There are seven basic conditions in total, and we consider that three of these are not satisfied by the current draft of the Neighbourhood Plan:

(a) Having regard to national policies and advice issued by the Secretary of State, it is appropriate to make the plan.

¹ <https://democratic.bracknell-forest.gov.uk/%28S%280qx2qwyn0icbgo55naznk0vw%29%29/mgIssueHistoryHome.aspx?Ild=134207&Opt=0>

(d) The making of the plan contributes to the achievement of sustainable development.

(e) The making of the plan is in general conformity with the strategic policies contained in the development plan for the area.

While a Basic Conditions Statement has been submitted alongside the Neighbourhood Plan (Appendix 9 of the consultation), we consider that it does not adequately demonstrate compliance with the statutory tests, particularly in relation to Basic Conditions (a), (d) and (e).

The Basic Conditions Statement largely adopts a descriptive approach, listing sections of national policy and asserting alignment, rather than critically assessing whether the policies of the Neighbourhood Plan, as drafted, properly apply national policy requirements. This is particularly evident in respect of Policy NP/EN5 (Local Green Space), where the Statement assumes compliance with NPPF paragraphs 106 and 107 without undertaking a rigorous, site-specific assessment of the proposed designations.

In relation to Basic Condition (a), the Statement does not demonstrate that the Neighbourhood Plan has proper regard to national policy on Local Green Space designation. In particular, it does not address whether LGS 6 (either alone or in combination with LGS 7) constitutes an extensive tract of land, nor does it engage with Planning Practice Guidance² which cautions against the use of Local Green Space as a substitute for Green Belt or other strategic landscape designations. Reliance on the wider Blackwater Valley Corridor and generalised landscape character does not satisfy the requirement for site-specific justification set out in paragraph 107 of the NPPF.

In relation to Basic Condition (d), the Statement treats environmental protection as synonymous with sustainable development, without addressing the social and economic implications of the Plan's approach. The absence of housing allocations in a higher-order settlement, combined with the extensive designation of Local Green Space at the settlement edge, represents a missed opportunity to contribute positively to housing delivery at a time of acute need. The Statement does not assess whether the Plan's policies actively undermine the achievement of sustainable development by unnecessarily constraining sustainable development opportunities.

In relation to Basic Condition (e), the Statement relies heavily on the fact that the adopted Local Plan does not allocate sites within Sandhurst. However, this does not, of itself, demonstrate general conformity. The Neighbourhood Plan must still align with the strategic objectives of the development plan, including the role of higher-order settlements in meeting housing needs. The Basic Conditions Statement does not engage with the Local Plan examination findings which rejected strategic gaps and green wedges, nor does it address the unresolved objection from Bracknell Forest Council that LGS 6 and LGS 7 constitute extensive tracts of land.

Taken together, these omissions mean that the Basic Conditions Statement does not provide a robust or transparent basis for concluding that the Neighbourhood Plan meets the statutory tests. These matters go to the heart of plan-making judgement and cannot be resolved through assertion alone.

² <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation>

Response to Consultation Statement

A Consultation Statement has been published alongside the Neighbourhood Plan in Appendix 8 which provides a summary of the representations received at Regulation 14 stage, including those submitted on behalf of our client. It also sets out the Town Council's response to these representations and explains the approach taken in preparing the Regulation 16 submission version of the Plan.

These representations do not seek to repeat the detailed points previously made. Rather, they respond directly to the Town Council's consideration of those representations, and in particular the reasoning provided in support of Policy NP/EN5 and the proposed Local Green Space designation affecting the Site.

Town Council position: characterisation of representations as commercial or speculative

The Consultation Statement characterises the representations submitted on behalf of our client as being driven primarily by a commercial or speculative interest in the Site. In doing so, the Town Council places reliance on the identity and perceived motivation of the representor rather than assessing the planning merits of the objection. Regardless of the source of the objection, the designation of land as Local Green Space must be justified against the criteria set out in paragraph 107 of the NPPF. That has not been demonstrated in this instance.

Town Council position: reliance on the previous appeal decision

The Consultation Statement places significant weight on the dismissal of the previous appeal in October 2023 (reference APP/R0335/W/21/3287383).

However, this does not provide a blanket justification for Local Green Space designation, nor does it remove the need for a site-specific assessment against paragraph 107 of the NPPF. A revised and materially reduced landscape-led scheme is now being progressed, and the suitability of the Site for Local Green Space designation must be considered based on the characteristics of the site itself within the requirements of paragraph 107 of the NPPF.

Town Council position: reliance on the wider Blackwater Valley Corridor

The Town Council's response relies heavily on the wider role, character and value of the Blackwater Valley Corridor and Horseshoe Lake. This conflates the acknowledged value of the wider landscape with the specific characteristics of the Site. National policy requires Local Green Space designations to be justified on a site-specific basis. The Consultation Statement does not demonstrate why the Site itself is demonstrably special to the local community, as distinct from its proximity to other valued landscapes.

Town Council position: absence of site-specific assessment against NPPF paragraph 107

The Consultation Statement does not provide a clear or structured assessment of whether the Site meets the criteria for Local Green Space designation in paragraph 107 of the NPPF. In particular, it does not properly address whether the Site is reasonably close to the community it is said to serve in functional terms, whether it is demonstrably special based on site-specific evidence, or whether it can properly be described as local in character and not an extensive tract of land. In the absence of such an assessment, and the apparently reluctance to consider a smaller, publicly accessible area of land, the proposed LGS6 designation is not supported by a robust evidence base and fails to have sufficient regard to national policy.

Town Council position: scale and extent of the proposed Local Green Space designation

The Consultation Statement does not meaningfully address concerns regarding the cumulative scale and extent of Local Green Space designations in this location, including the combined extent of LGS 6 and LGS 7. The designation operates as part of a continuous and extensive tract of protected land, which conflicts with the clear intention of paragraph 107(c) of the NPPF.

The Consultation Statement is also disingenuous in terms of failing to acknowledge that the site has no public access at all. Indeed, photographs are taken from outside the proposed boundary, whilst paragraph 4.6.8 of Appendix 4 notes that "*Albeit that the areas immediately surrounding the lakes are open to the public there are*

significant restrictions in place whereby footpaths are clearly defined and fenced such that much of the area enables wildlife and wildfowl to flourish without close contact with the public, albeit that wildfowl can be seen via nature observation points.”

Paragraph 4.6.10 then notes that *“The Lakes and the surrounding public rights of way are used by in excess of 30,000 visitors per annum (BFC and BVCP surveys).”*

This issue remains fundamental to the acceptability of the proposed designation.

Supporting Housing delivery

The current draft of the Neighbourhood Plan does not identify its own “identified housing requirement” and consequently does not include any new site allocations for housing. Effectively, no new housing is proposed in Sandhurst over the NP period. This represents a missed opportunity given the level of housing need across Bracknell Forest and the strategic requirement to plan positively for growth. While the Local Plan sets out borough-wide targets, it is not apparent that an indicative housing requirement has been provided for Sandhurst. Without such clarity, the plan fails to demonstrate how it will contribute to meeting identified needs in a sustainable and locally appropriate way.

While there is no requirement for Neighbourhood Plans to include housing allocations, the current approach has implications for the application of paragraph 14 of the NPPF, which provides protections for neighbourhood plans against the presumption in favour of sustainable development where the plan is less than five years old and contains housing allocations. Because the draft plan does not allocate any sites, these protections cannot apply. In practice, this leaves the plan vulnerable to speculative development and undermines its ability to shape growth in a way that reflects local priorities.

Allocating sites within the Neighbourhood Plan would not only strengthen its compliance with national policy but also enable the community to influence where and how new homes are delivered. It would provide certainty for infrastructure planning and help ensure that Sandhurst plays its part in meeting the borough’s housing requirement, supporting sustainable development and aligning with the strategic objectives of the Local Plan.

Policy Duplication and Detailed Policy Comments

Having reviewed the Regulation 16 submission version of the Plan, a number of the concerns raised in our Regulation 14 representations remain unresolved. In particular, several policies continue to repeat or closely mirror national policy, the Bracknell Forest Local Plan or adopted guidance, rather than providing locally specific planning policy. Paragraph 16 of the NPPF is clear that plans should serve a clear purpose and avoid unnecessary duplication.

“...serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”

The following policies remain of concern in this regard:

- **NP/H1 Housing:** the policy refers back to Local Plan policies on housing and the Thames Basin Heaths SPA without setting out a clear local housing strategy or allocation approach for Sandhurst.
- **NP/H2 Development in the Settlement of Sandhurst and in the Countryside:** the policy substantially reflects the approach already established by the Local Plan and national policy, without identifying locally specific criteria that would assist decision-making.
- **NP/D3 Listed Buildings:** while the objective of protecting heritage assets is supported, the policy largely duplicates existing statutory duties and Local Plan Policy LP29. Any additional local guidance should be clearly expressed in supporting text rather than duplicating the strategic policy framework.

We note that Bracknell Forest Council has also identified policy duplication and cross-referencing issues in its Regulation 16 response. The Plan would be clearer and more effective if repetitive policies were deleted or redrafted to focus on genuinely local matters.

Without such changes, the Plan risks adding unnecessary complexity to the development plan without improving policy outcomes. This is relevant to Basic Condition (a), as the Plan does not properly reflect the NPPF requirement for clear and purposeful policies.

COMMENTS ON DETAILED POLICIES

Having reviewed the Regulation 16 submission version of the Sandhurst Neighbourhood Plan, it is apparent that the policies addressed below have not been materially amended since the Regulation 14 consultation. While some supporting text has been expanded, the policy wording and underlying approach remain substantively unchanged. As a result, the concerns raised in our earlier representations have not been resolved. The comments that follow therefore focus on why these policies, as submitted at Regulation 16, continue to raise issues of effectiveness, policy duplication and compliance with the Basic Conditions, rather than repeating the Regulation 14 drafting points.

NP/H1 Housing

Policy NP/H1 does not provide a locally specific or positive approach to housing delivery. While it supports affordable and starter homes and brownfield development in principle, it does not identify an indicative housing requirement for Sandhurst, allocate sites, or include a mechanism for future review.

The policy therefore fails to demonstrate how Sandhurst, identified as a higher-order settlement in the adopted Local Plan, will contribute to meeting borough-wide housing needs. In the context of increased housing requirements, NP/H1 remains largely aspirational and does not contribute meaningfully to sustainable development and therefore does not conform to Basic Condition A

NP/H2 Developments in the Settlement of Sandhurst and in the Countryside

NP/H2 continues to direct development towards the defined settlement boundary and relies on the Local Plan and NPPF for development outside the settlement. This adds little to the existing policy framework and risks creating confusion through repetition.

Where a neighbourhood plan includes countryside policy, it should provide locally specific guidance that assists decision makers. NP/H2 does not do this. Instead, it restates the principle that development outside the settlement boundary should be considered against national and Local Plan policies. That approach does not add value and should be reconsidered.

NP/H1 and NP/H2 would be more effective if they were linked to a clear housing strategy for Sandhurst, including an indicative housing requirement or a commitment to review once the Local Plan is updated. Without this, the housing section of the Plan lacks a positive planning function, and does not conform to Basic Condition A.

NP/D4 Trees and Hedgerows

We continue to support the principle of retaining important trees and hedgerows. However, the replacement planting requirements in NP/D4 remain overly prescriptive. In particular, requiring up to eight replacement trees for the loss of a single large tree has not been justified by proportionate evidence and may be impractical on constrained sites.

- The ecological and spatial context;
- Whether the tree is subject to a Tree Preservation Order; and

- Its overall condition.

A more appropriate policy approach would allow the scale and form of replacement planting to be considered having regard to the condition, value and status of the tree, the constraints of the site, and the wider landscaping and biodiversity strategy. Mandatory biodiversity net gain already provides a mechanism to secure measurable ecological improvements, and the policy should avoid duplicating or cutting across that regime.

NP/EN1 – Development in the Blackwater Valley Corridor

Policy NP/EN1 seeks to manage development through reference to landscape character, but largely reflects matters already addressed through Local Plan countryside and landscape policies.

Without clearer differentiation from strategic policy or locally specific guidance, the policy risks being applied as a blanket restriction on development and adds limited value to the development plan, and does not conform to Basic Condition A. It should be deleted.

NP/EN2 – Wildlife within the Blackwater Valley Corridor

NP/EN2 requires development within the Blackwater Valley Corridor to demonstrate that there will be “no adverse impact on wildlife”. This absolute wording does not reflect the mitigation hierarchy embedded in national policy or the Local Plan and the role of avoidance, mitigation and compensation. It does not conform to Basic Condition A.

Paragraph 187 of the NPPF states that policies should:

“...contribute to and enhance the natural and local environment... including protecting and enhancing sites of biodiversity, as well as minimising impacts on biodiversity.”

The term “wildlife” is also undefined, which creates uncertainty over the scope of the policy. It could be read as applying to all species rather than protected species, priority habitats or designated ecological assets. That would be disproportionate and inconsistent with national policy.

We recommend that NP/EN2 is revised so that it:

- reflects the mitigation hierarchy;
- focuses on protected species, designated sites and priority habitats; and
- aligns with Local Plan policy and biodiversity net gain requirements.

Policy NP/EN5 – Local Green Space

Policy NP/EN5 proposes to designate our client’s land as part of LGS 6 – Horseshoe Lake and surrounding countryside. This remains our principal objection to the submitted Neighbourhood Plan.

Having reviewed the Regulation 16 submission, including the supporting evidence and the Consultation Statement, it is clear that the fundamental concerns raised at Regulation 14 stage have not been resolved. While the supporting material has been expanded, the Plan does not demonstrate that the Site meets the tests for Local Green Space designation set out in paragraph 107 of the National Planning Policy Framework.

The Regulation 16 submission continues to rely heavily on the acknowledged value of the wider Blackwater Valley Corridor, Horseshoe Lake and Grove Lake, rather than undertaking a structured, site-specific assessment of our

client's land. This approach conflates the characteristics of publicly accessible lakeside areas with the private farmland to the east of the proposed LGS, that does not itself function as Local Green Space for the community.

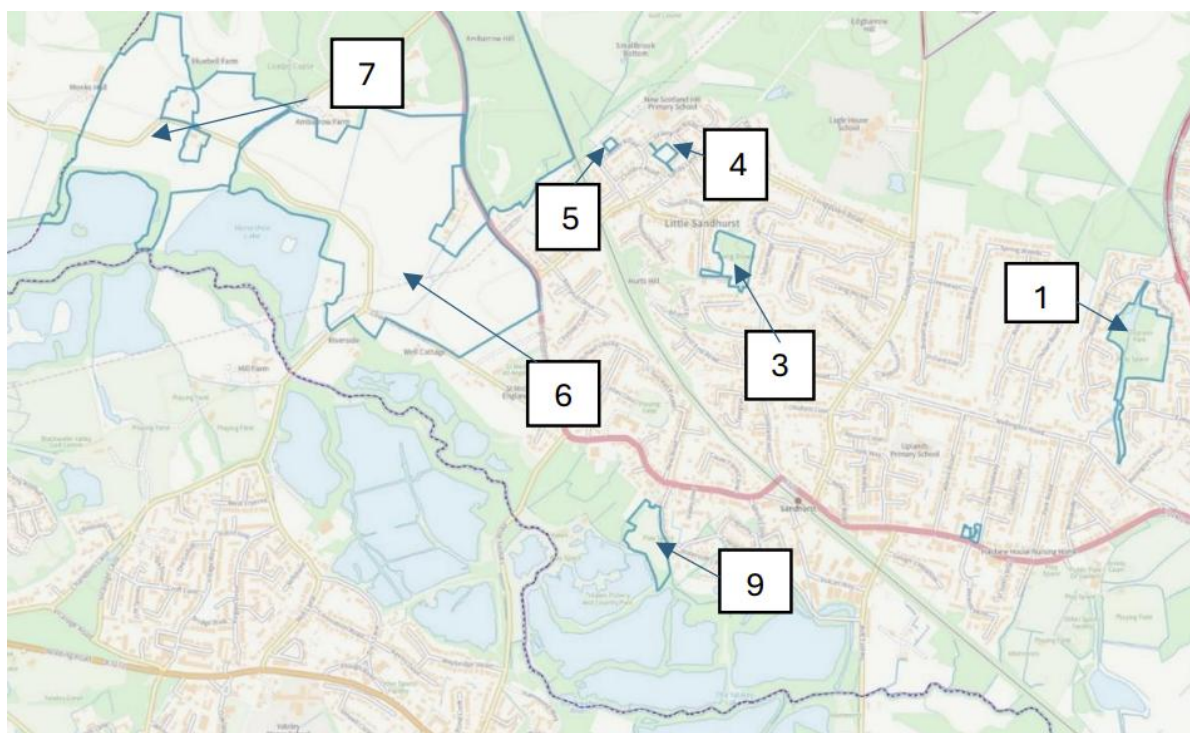


Figure 1 Extent of LGS 6 and 7 in the context of Sandhurst

NPPF paragraph 107

Paragraph 107 of the NPPF (December 2024) states:

“The Local Green Space designation should only be used where the green space is:

- (a) in reasonably close proximity to the community it serves;*
- (b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- (c) local in character and is not an extensive tract of land”*

Each limb of paragraph 107 remains relevant to the proposed designation and is considered below.

Criterion (a): reasonably close to the community it serves

The evidence relies on proximity to nearby settlements and visitor use of Horseshoe Lake. However, this does not address the functional relationship between the Site and the community. The Site is private land, with no general public access and no public rights of way, and does not currently serve a recreational or community function. The Plan does not explain how land which is not accessible or used by the community can reasonably be described as Local Green Space in functional terms.

While public access is not an absolute requirement for Local Green Space designation, Planning Practice Guidance makes clear that land without public access should be valued for reasons such as wildlife, historic significance or

beauty. The Regulation 16 evidence does not demonstrate that the Site possesses these qualities. Instead, it relies on generalised assertions about the wider lakeside environment and the Blackwater Valley Corridor.

The absence of public access is particularly relevant here because the designation would prevent the opportunity for a development-led scheme to deliver new public open space and improved pedestrian and cycle connections towards Horseshoe Lake. Rather than securing public benefit, the proposed designation would constrain a sustainable development opportunity capable of delivering new access and recreational benefits. 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.

Accordingly, the Site is not shown to be reasonably close to the community it is said to serve in a functional sense.

Criterion (b): demonstrably special to the local community and holding particular local significance

The Regulation 16 material relies on broad contextual factors, including the wider landscape history of the Blackwater Valley, visitor numbers at Horseshoe Lake, previous landscape designations and the role of the area for wildlife and wildfowl. These factors describe the wider corridor but do not demonstrate that the Site itself is demonstrably special to the local community or holds particular local significance. Only a small amount of the proposed designation of LGS 6 is SANG, and none of LGS 7.

As Bracknell Forest note, 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). In landscape terms, the Site lies within a wider landscape character area. That fact alone does not justify Local Green Space designation. Landscape evidence submitted in support of the previous planning application concluded that the Site was of no more than local value and did not possess elevated landscape value above the wider character area. The Local Green Space evidence does not identify demonstrable physical attributes of the Site that would justify a different conclusion.

There is also no clear evidence of historic significance, recreational value or ecological importance sufficient to justify designation. The Site is private land, has no general public access and is not itself a recreational resource. Previous ecological work identified that much of the Site comprises habitats of limited intrinsic nature conservation value. The evidence relied upon in the Local Green Space Study relates principally to the wider lakes and corridor, not the Site itself.

The previous appeal decision does not alter this position. The Inspector identified landscape harm associated with a substantially larger residential proposal but did not conclude that the Site was incapable of accommodating any development or that it should be subject to long-term Green Belt-equivalent protection. A materially reduced and landscape-led scheme is now being progressed.

Overall, the Regulation 16 submission continues to conflate the value of Horseshoe Lake and the wider Blackwater Valley Corridor with our client's land. This is not sufficient to satisfy paragraph 107(b) of the NPPF, and therefore fails Basic Condition test A. **Criterion (c): local in character and not an extensive tract of land**

This remains a fundamental and unresolved issue at Regulation 16. LGS 6 extends to approximately 29 hectares and is physically and functionally contiguous with LGS 7, which extends to approximately 15 hectares. Taken together, these designations form a continuous area of around 44 hectares along the edge of Sandhurst.

The Regulation 16 submission does not meaningfully address whether this cumulative extent constitutes an extensive tract of land. The Local Green Space Study itself considers LGS 6 and LGS 7 together in parts of its

assessment, reinforcing the conclusion that the designations operate as a single, large strategic area rather than discrete local spaces.

Bracknell Forest Council has expressly identified that “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.”

We concur with this statement, and the Council’s conclusion that:

“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.”

Basic Conditions test A is failed. The Town Council’s Regulation 16 response does not resolve this concern or explain why national policy should be interpreted differently.

This approach is also inconsistent with the conclusions of the Bracknell Forest Local Plan examination, where Inspectors rejected strategic gaps and green wedges in favour of reliance on landscape character policies as a more flexible and nuanced means of protecting settlement setting. Policy LP36 of the Local Plan already provides an appropriate framework for assessing landscape impacts in this location, without imposing additional Green Belt-style restrictions.

Conclusion on Policy NP/EN5

Local Green Space designation applies Green Belt-level restrictions to land. Given the scale of LGS 6 and its location at the settlement edge, the designation would impose long-term constraints on a sustainable development opportunity without a proportionate or robust justification. This is particularly significant in the context of increased housing need and the absence of housing allocations within Sandhurst.

The Regulation 16 submission does not demonstrate that the Site meets the tests for Local Green Space designation in paragraph 107 of the NPPF. The evidence relies on the wider value of the Blackwater Valley Corridor rather than a proper assessment of the Site itself, and the cumulative scale of LGS 6 and LGS 7 remains inconsistent with national policy.

Policy NP/EN5 therefore fails to have proper regard to national policy, does not contribute positively to the achievement of sustainable development, and is not in general conformity with the strategic policies of the development plan. We accordingly object to the designation of our client’s land within LGS 6 and request that it is removed from the Local Green Space designation.

Policy NP/T1 – Traffic Congestion

Policy NP/T1 requires transport assessment where development may increase traffic on key routes. While proportionate transport assessment is supported, this matter is already addressed through Local Plan Policy LP60 and established development management processes.

The policy therefore duplicates existing requirements and should either be deleted or clearly aligned with the Local Plan framework.

Policy NP/T3 – Residential Parking

We remain concerned that NP/T3 introduces residential parking standards that differ from the adopted Parking Standards SPD without sufficient evidence. The supporting text relies principally on questionnaire responses and

general concerns regarding car ownership, but does not provide a robust evidential basis for departing from borough-wide standards.

We also noted the following duplication of existing policy:

- Sub-paragraphs (b), (d), and (e) replicate existing SPD specifications for garages, car ports, and parking spaces.
- Sub-paragraph (h) duplicates Local Plan Policy LP62 on EV charging, now covered by Building Regulations.

These provisions should be removed or substantially amended so that the policy does not duplicate existing standards or establish a separate parking regime for Sandhurst without justification. Bracknell Forest Council has raised similar concerns regarding the creation of different parking standards within the Borough.

Policy NP/T4 – Sustainable Transport

NP/T4 supports improvements to bus services and pedestrian access to Sandhurst Station. These are supported as aspirations, but the policy does not identify a clear mechanism through which such improvements would be delivered, other than through developer contributions where justified. As drafted, it reads more as an infrastructure aspiration than a development management policy.

Policy NP/ECC/1 – Energy Saving

NP/ECC1 encourages energy saving measures and low-carbon technologies. While the principle is supported, the policy should avoid duplicating or seeking to supplement matters that are properly addressed through the Building Regulations and the Future Homes Standard.

This concern is reinforced by the draft National Planning Policy Framework published in December 2025, which states at policy PM13(1)(b) that planning policy should avoid introducing quantitative standards for matters already covered by Building Regulations. Although not yet adopted national policy, it reflects a clear direction of travel and reinforces the need to avoid unnecessary duplication.

Policy NP/ECC1 should therefore be amended so that it supports compliance with national standards and encourages good practice, rather than imposing additional local requirements or duplicating the building control regime.

CONCLUSION

For the reasons set out in these representations, we consider that the Sandhurst Neighbourhood Plan, as submitted at Regulation 16, does not meet the Basic Conditions. In particular, serious concerns remain in respect of whether the Plan has proper regard to national policy, contributes to the achievement of sustainable development, and is in general conformity with the strategic policies of the development plan.

These concerns are not limited to matters of drafting or emphasis. They go to the substance of the Plan's approach, most notably in relation to the proposed Local Green Space designations, the failure to plan positively for housing delivery in a higher-order settlement, and the retention of a number of policies which duplicate or conflict with existing national and local policy.

The Town Council's Consultation Statement demonstrates that these matters were raised clearly at Regulation 14 stage, including by Bracknell Forest Council. However, the responses provided do not engage with the root of the issues identified. Instead, they rely on generalised assertions, the perceived motivations of representors, or the value of the wider landscape, rather than addressing whether the Plan's policies satisfy the specific tests set out in national policy and the Basic Conditions.

In particular, the continued designation of land under Policy NP/EN5, and the Town Council's Consultation Statement response which does not engage with the site-specific application of national policy or resolve the concerns raised by both the Local Planning Authority and landowners, demonstrates that there remain fundamental and unresolved issues of Basic Conditions compliance which cannot be addressed through written representations alone.

As a result, the Regulation 16 submission version of the Plan has not materially evolved to resolve these concerns. The unresolved disagreement between the Qualifying Body, the Local Planning Authority and our client, particularly in respect of the scale, justification and effect of the Local Green Space designations, is a material consideration for examination, on which **we formally request the opportunity to appear before the Examiner at Examination.**

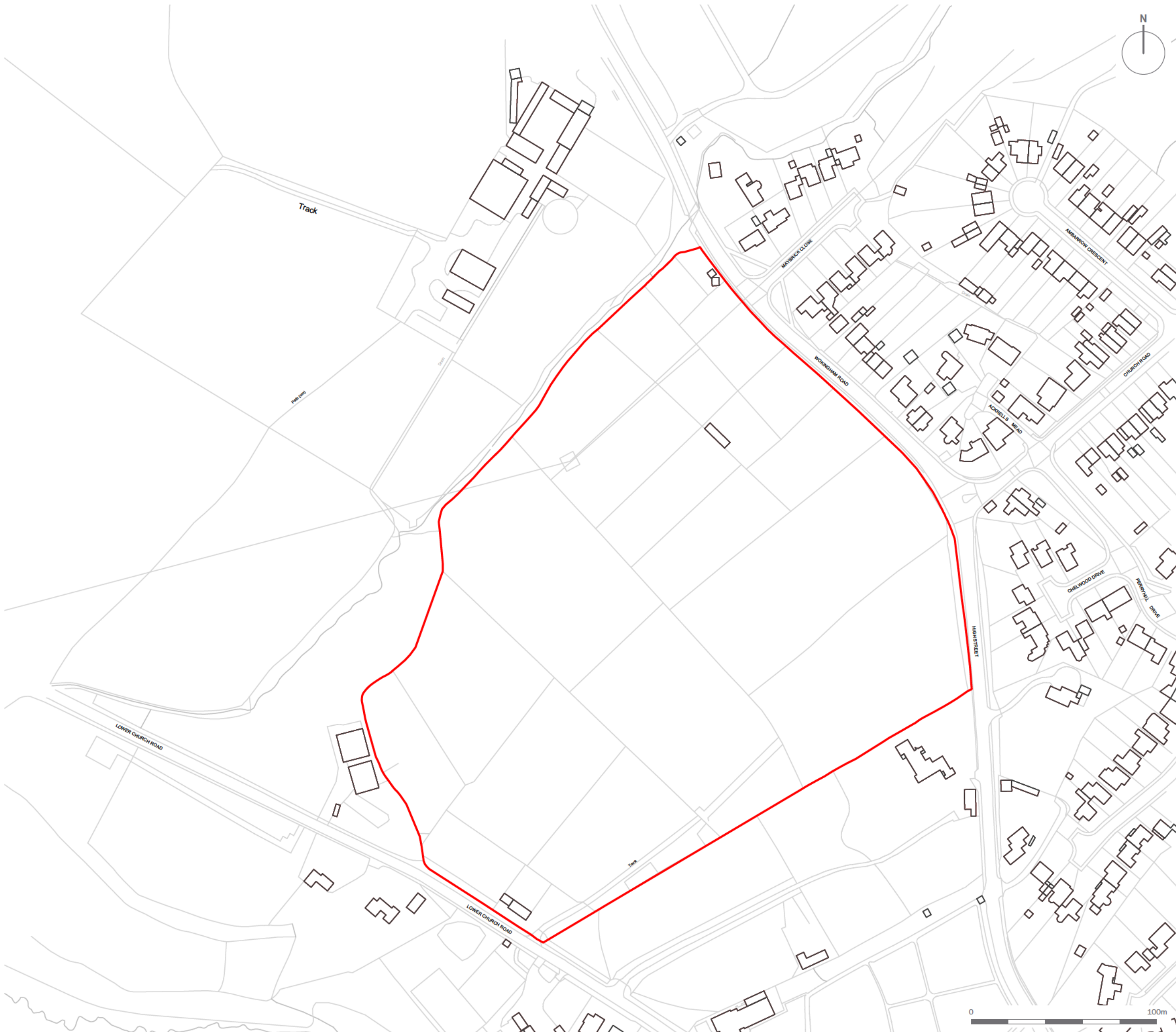
Given the nature and significance of the issues raised, we do not consider that they can be adequately or fairly addressed through written representations alone. They involve matters of planning judgement, interpretation of national policy, and the application of the Basic Conditions which would benefit from detailed testing and clarification.

We therefore formally request that the Examiner convenes a public hearing to consider the Plan's compliance with the Basic Conditions, including the justification for Policy NP/EN5 and the implications of the Plan's approach to housing delivery and sustainable development. We remain committed to engaging constructively with the examination process and would welcome the opportunity to assist the Examiner further.

Yours sincerely


Senior Director





Site Boundary (7.29ha)

client

Bloor Homes Limited

project title

Land West of Wokingham Road and East of Lower Church Road, Sandhurst

drawing title

Site Boundary Plan

date

09 JANUARY 2026

drawn by **PWi**

drawing number

edp6773_d067

checked **WGa**

scale

1:2,000 @ A3

QA **PDO**



the environmental
dimension partnership

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Sandhurst Neighbourhood Plan Regulation 14 Submission

Local Green Space Study Review

edp6773_r034a

QA: WGa/NPR_FJe/FMi_090125

1 INTRODUCTION

- 1.1 The Environmental Dimension Partnership Ltd (EDP), an established and independent multi-disciplinary environmental planning consultancy providing expert advice to public and private bodies in the fields of landscape, ecology and protected species, archaeology and cultural heritage, masterplanning and arboricultural matters.
- 1.2 EDP is a Registered Practice of the Landscape Institute and a corporate member of IEMA. The practice represents clients with land and development interests throughout the UK.
- 1.3 Since the formation of the business in 2005, EDP have been commissioned to provide environmental planning inputs to over 5,000 development-related projects across the UK, and as a team are working on over 500 residential related development projects in England and Wales at any one time. We specialise in the consideration of the development interests of land through the entire planning and development process – based on analysis of environmental receptors, design and mitigation, assessment of effects and implementation.

2 SCOPE

- 2.1 This note addresses the landscape matters embedded in the Regulation 14 submission of the neighbourhood plan, specifically the emerging 'Local Green Space and related Sandhurst designations' detailed at section 5.5 and Appendix 4 (Map Local Green Space (LGS) 6, Horseshoe Lake and surrounding countryside).
- 2.2 The extent of the proposed LGS 6 can be found on page 51 of appendix 4 of the Regulation 14 Plan and is proposed to extend to an area of approximately 30 hectares (ha).

3 POLICY CONTEXT

National Planning Policy Framework

- 3.1 The *National Planning Policy Framework* (NPPF) December 2024 contains three paragraphs (paragraphs 106-108) of relevance to the designation of LGS. Specific reference to the designation of LGS is made within paragraph 107, which states:

“107. The Local Green Space designation should only be used where the green space is:

- a. *in reasonably close proximity to the community it serves;*
- b. *demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c. *local in character and is not an extensive tract of land.”*

3.2 It can be seen from this that LGS designation is intended to protect local areas of green space which have a clear value and significance to the local community as open spaces and is not a tool to control urban growth in a manner more associated with green belt or green wedges.

3.3 In order to review the site against the ‘tests’ set out within NPPF paragraphs 106-109, EDP has undertaken a review of local landscape character, which have included site visits by experienced, chartered Landscape Architects. Where necessary, the relevance of the published character assessments to the local landscape is commented on below.

Test ‘A’: Proximity

3.4 In the case of the site, in terms of being ‘*in reasonably close proximity to the community it serves*’, LGS 6 is an extensive tract of land extending out from the settlement boundary. It is not generally located within 300m of existing or proposed development on all sides and is crossed by only a single Public Right of Way (PRoW).

3.5 The Accessible Natural Greenspace Standard (ANGSt) was originally developed by English Nature but has subsequently been revised by Natural England to create the new *Accessible Greenspace Standard* (AGS) which is included in the Green Infrastructure Framework.

3.6 Natural England's *Green Infrastructure Standards* (AGS) 2023¹ can be used to define the likely size of a suitable Local Green Space and its distance from the local community.

3.7 The Accessible Greenspace Standard (AGS)² is one of the 5 Headline Green Infrastructure (GI Standards included in the GI Framework. The Accessible Greenspace Standard covers a broader range of greenspace than the original ANGSt, while retaining a focus on accessible natural greenspace. It measures six categories of publicly accessible greenspace of increasing size and distance from home. A site, such of that in this instance of over 20ha (50 acres) would be considered to be ‘an extensive tract of land’ and therefore, not suitable for designation as a Local Green Space. Notwithstanding the fact that majority of the proposed LGS 6 is not accessible.

3.8 It should be noted that distances to green space should be considered as actual walking distances. Actual walking distance would usually be measured though network analysis not

¹ Green Infrastructure Standards for England Summary (accessed 07/01/2026)

² <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Standards%20for%20England%20Summary%20v1.1.pdf> (accessed 07/01/2026)

straight distance analysis. Furthermore, greenspaces should be accessible by public transport and, or safe active travel routes.

3.9 Therefore, LGS 6 is considered to fail Test 'A'.

Test 'B': Demonstrably Special and Local Significance

3.10 The proposed LGS 6 broadly comprises parcels of land dissected by a mature tree belts and a stream. Each parcel of land is separated into multiple fields used for grazing horses, along with a small storage yard and storage buildings to the south-east. The area of land south and west of Lower Sandhurst Road comprise accessible land associated with the blackwater Valley and Horseshoe Lake recreational destination.

3.11 There are several PRoW within the local context, connecting Sandhurst and the surrounding settlements to the wider landscape. 'Three Castles Path' promoted route crosses the proposed LG6 area and the 'Blackwater Valley Path' is situated to the south.

3.12 In broad terms, topographically the area proposed as LGS 6 is situated on a south-west facing slope of the valley of the Blackwater, where it is dissected by a valley running north-east – south-west.

Landscape Character Context

3.13 At a National level, LG6 falls within Natural England's National Character Area (NCA) No 129 'Thames Basin Heaths.

3.14 The key characteristics of this NCA, of relevance to LGS 6 and surrounding area, are:

- *"High woodland cover, offering an array of colour in the autumn. Conifers and large plantations on former heathland are dominant features in the east, while the west is scattered with small, semi-natural woodlands on ancient sites;*
- *Beyond the large areas of heathland and woodland, there is a patchwork of small to medium-sized fields with woods. The legacy of historic hunting forests includes veteran trees, ancient woods, ancient hedgerows and parklands. Historic meadows remain as fragments along watercourses; and*
- *20th-century conurbations, including Camberley, sprawl along the Blackwater Valley, with associated roads (including the M3) dissecting heathland and woodland into blocks."*

Bracknell Forest Landscape Character Assessment 2015

3.15 The proposed LGS 6 extends across two Landscape Character Areas (LCA), with the bulk of the land falling within Landscape Character Area 'B1 – Crowthorne/Sandhurst.

- a. The proposed LGS 6 conforms to the broad spectrum of elements described as characteristic of Area B1, the 'host' landscape character (LCA B1 – Crowthorne/Sandhurst);
- b. In terms of Key characteristics:

- Whilst the LGS 6 area exhibits an open character (due to the absence of development), it does not contain large areas of woodland or heathland;
 - Medium to long distance views are available from the north-eastern extent, albeit these are currently not experienced by any public receptors;
 - Horseshoe Lake within the Blackwater Valley is a well-used and valued recreational venue to the north-west of the Appeal Site, as is Ambarrow to the north-east;
 - Glimpsed views of the tower of the Church of St Michael are available across the Appeal Site from sections of the Three Castles Path (Promoted Route); and
 - The areas current land use does not give any sense of wildness, to the contrary, parts are significantly influenced by its proximity to existing residential development and its current land use.
- c. Of the 'Valued Features and Characteristics':
- **Distinctive historical buildings** – The buildings and cultural associations listed (Broadmoor and Wellington College) do not have any relevance to the proposed LGS area;
 - **Intricate mosaic of heathland, woodland and grasslands** – The proposed LGS area is not an area of Woodland or Heathland;
 - **The woodland and trees** – The LGS area does contain, and is bounded by trees and woodland;
 - **Remnant heathland** – There is no remnant heathland within the area;
 - **Historic pastoral fields divided by hedgerows with hedgerow trees** – The proposed LGS 6 area does not represent a preserved historic field pattern, due to the loss of internal field boundaries, the only landscape feature pre-dating the 19th century is the stream corridor. A review of the tithe mapping has identified that the historic land use is predominantly arable;
 - **Localised areas of relative wildness with a sense of tranquillity** – Across much of the area there are limited views out, primarily due to the mature hedgerows and trees which surround the proposed LGS and its undulating topography. From local high points, there are opportunities of medium and long-distance views containing residential development set within a strong framework of woodland. The sense of tranquillity is disrupted by the adjoining settlement edges, road network, overhead powerlines and existing land use of intensive equine activity;
 - **Views from open elevated ridges** – The proposed LGS 6 area does not conflict with any designed views within a designated landscape;
 - **Designed views associated with designed landscapes** – The proposed LGS 6 has very limited public access, restricted to, the Three Castles Path and areas

around Horseshoe Lake, it is also proximate to Ambarrow Suitable Alternative Natural Greenspace (SANG);

- **Areas for recreation** – Whilst the Appeal Site is undoubtedly un-developed, it's current land use (being intense equine activity) gives a sense of urban fringe as opposed to a more rural character, beyond a single PRoW and current activity around Horseshoe Lake, there is no public access across the proposed LGS 6 area; and

3.16 Whilst the majority of the proposed LGS 6 falls within Area B1, the around Horseshoe Lake lies within Landscape Character Area 'E1 Blackwater River Valley LCA, which is adjacent to 'Area B1 – Crowthorne/Sandhurst'.

a. In terms of Key characteristics (**EDP emphasis**):

- The bordering fields of improved grassland, which are key characteristics, are contained within the Blackwater Valley LCA; and
- The naturalistic nature of the water bodies, meadows and woodland “**provide a strong sense of tranquillity and relative remoteness in an area close to urban population**”.

b. Of the 'Valued Features and Characteristics' (**EDP emphasis**):

- **The undeveloped character of the valley** – this area “**provides a sense of naturalness and tranquillity and relative wildness in close proximity to urban areas, providing a physical and visual separation or 'gap' between the settlements of Sandhurst and Yateley/Blackwater**”. The area provides continuation and access to the wider Blackwater Valley landscape;
- **The rural nature of the historic lanes** – This relates to routes as they cross the valley; and
- **Recreational areas** including the Trilakes Country Park and the “**Horseshoe Lake, providing for both passive and active pursuits (boating, walking, fishing and viewing wildlife). In addition, the Three Castle Long Distance Footpath provides access to, and enjoyment of, the landscape**”.

c. Of the identified Landscape Strategies, it should be noted that:

- “**Protect the role the landscape plays in providing a 'gap' or separation between the settlements of Sandhurst and Yateley (within Hampshire to the south)**” – the gap function between settlements is provided for by the Blackwater LCA, not the entire LGS as proposed; and
- “**Protect the unsettled and rural character of the valley and the sense of naturalness, tranquillity and relative wildness this provides by enduring lanes retain their rural character and protecting areas of woodland that provide a screening function to adjacent built development**” – These judgements only

relate to the areas of the proposed LGS falling within E1 Blackwater River Valley LCA, not the land falling with LCA B1.

Conclusions Regarding Baseline Local Landscape Character

- 3.17 The majority of the proposed LGS 6 is in intensive equestrian use, which is in contrast with the adjoining residential land use. Much of the area proposed for LGS 6 is generally well-contained by vegetative boundaries.
- 3.18 The most notable and distinctive attributes are its undeveloped urban fringe character, treed hedgerow boundaries, its topographical context, and its spatial proximity to the existing development within Sandhurst.
- 3.19 The bulk of land proposed under LGS 6 has limited affinity to the published valued characteristics.

Visual Context

- 3.20 Views are mostly limited to those from adjoining residential dwellings off Sandhurst Road, Lower Church Road and Mill Lane. Furthermore, there are limited opportunities for views from the PRow network to the south and north-west.
- 3.21 Given the enclosed nature of much of the proposed LGS 6 area, there are few views of it from roads. These are limited to within the immediate context of Wokingham Road, Lower Church Road and Mill Lane. These views are direct and short distance in nature; however, this is not surprising given that the roads abut the LGS 6 boundary.

Landscape Value

- 3.22 The *Guidelines for Landscape and Visual Impact* (GLVIA3) and the 2021 Landscape Institute (LI) Technical Guidance Note (TGN) 02-21 assist in delivering a framework for an objective landscape assessment of value. In undertaking this appraisal, Box 5.1 on page 84 of GLVIA3 and Table 1 of TGN 02-21 identify criteria relevant to the judgements about landscape value – EDP has used the criteria from the Technical Note, this being an evolution of the GLVIA criteria. These criteria are reproduced in **Table EDP 3.1**, with observations alongside, based on published material and from EDPs field assessments. For each of the nine criteria, the proposed LGS is assessed on the basis of a range from ‘high’, through ‘medium’ to ‘low’ in terms of the performance against these criteria.

Table EDP 3.1: GLVIA/TGN Assessment

GLVIA/TGN Criteria	EDP's Observations
Landscape Condition: Landscape which is in a good physical state both with regard to individual elements and overall landscape structure.	Medium – Hedgerows and mature trees are generally unmanaged, and the proposed LGS area is subject to several urban edge influences which affect the character of the land. The vegetation on the Appeal Site boundaries (and adjacent) comprises mature well-treed features, across the proposed LGS area subdivision is mostly horse paddock fencing. The stream from Perry's bridge, which

GLVIA/TGN Criteria	EDP's Observations
	transects the area is well lined with mature vegetation and trees. The published landscape character assessment identifies 'Valued' features as Woodland/Heathland Mosaic, however, the majority of the proposed LGS 6 area is itself identified as intensively grazed grassland.
Natural Heritage: Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest, which contribute positively to the landscape.	Medium - The trees, hedgerow network and grassland are recognised as being of some ecological interest. The underlying geology is of agriculturally poor, acidic sandy soils. This is distinct from the wider Blackwater Valley deposits.
Cultural Heritage: Landscape with clear evidence of archaeological, historical or cultural interest, which contribute positively to the landscape.	Medium – The LGS area does not contain any designated heritage assets, desk-based assessment and fieldwork have identified this is a low potential to encounter previously unrecorded archaeological remains of significance. Part of the proposed LGS is within the setting of the Church of St Michael. The historic landscape pattern has been eroded, with only the stream predating the late 19 th century.
Recreational: Landscape offering recreational opportunities where experience of landscape is important.	Medium – There is no public access across the vast majority of the proposed LGS 6 area, furthermore, there are limited views into the proposed LGS area from the surrounding context (including the areas of the proposed LGS 6 which are accessible).
Perceptual (scenic): Landscape that appeals to the senses, primarily the visual sense.	Medium – Beyond limited views from the PRoW network (considered as an aspect of the scenic quality), no particular perceptual qualities have been identified beyond those associated with the urban fringe condition of the proposed LGS area. The area is occasionally visible from tracts of the adjacent PRoW network – which allow limited views. However, the amenities of such views are influenced by adjoining urban influences including residential development and overhead powerlines.
Perceptual (wildness and tranquillity): Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies.	Medium to Low – Given the proximity to the urban area, and the influence of noise, lighting and the perceptual sense of urban form, this factor is limited.

GLVIA/TGN Criteria	EDP's Observations
Functional: Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape.	Medium – Most of the proposed LGS area is an area of intensive equine activity. Whilst such land has its own value, this kind of land is neither rare, special, nor unusual in the context.
Associations: Some landscapes are associated with particular people such as artists or writers, or events in history that contribute to perceptions of natural beauty in the area.	Low – No known associations, beyond spatial proximity to the Blackwater Valley. There is no significant or current relationship between the proposed LGS area and the historic core of any settlements, nor are there any other notable facets of local history represented within the proposed LGS.
Distinctiveness: Landscape that has a strong sense of identity.	Medium – There are no features of elevated interest or distinctiveness for ecological, arboricultural or heritage reasons within the LGS 6 area. Views are evident from the highpoints within the most elevated portions of the area, but these are not publicly accessible, or especially remarkable.

3.23 Having considered the area in accordance with GLVIA3 and TGN 02-21, the proposed LGS 6 area, is overall, of no more than 'medium' landscape value. Moreover, there exists, no evidence (based on 'demonstrable physical attributes') to suggest that further weight should be attached to the value or specialness of the proposed LGS 6 area derived from the use or enjoyment of this area by local residents (beyond that considered above - such as visual amenity from a single PRow).

3.24 The proposed LGS 6 area does not demonstrate the presence of a sufficient number of indicators of landscape value, nor does it have a single indicator of such importance of this area of countryside are so special as to justify its long-term protection as an extensive area of LGS.

3.25 Therefore, LGS 6 is considered to fail Test 'B'.

Test 'C': Local in character and is not an extensive tract of land

3.26 The proposed LGS 6 area (as well as other proposed LGS areas) covers a large area of land. Although there is no definition of an 'extensive tract of land' in national policy or guidance, an LGS should be 'local in character'. To designate areas of land of this scale as being 'local in character' is not the same as merely being representative of the wider 'host' published landscape character assessment (as detailed above under Test 'B'). Furthermore, the area proposed as LGS 6 extends across two of Bracknell's Local LCAs.

3.27 In addition, LGS 6 is immediately adjacent to LGS 7, which measures c.15ha, the combined LGS 6 and 7 areas equate to c.45ha of proposed LGS. Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements and extending well beyond, such as this, are not appropriate.

3.28 Finally, as discussed under Test 'A' - scale and accessibility is not consistent with classification of the area as a local green space as set out by Natural England.

3.29 Therefore, LGS 6 is considered to fail Test 'C'.

NPPF 'Tests': Summary

3.30 Therefore, with regard to NPPF paragraph 107, the proposed LGS 6 designation does not meet the relevant NPPF tests:

- The area currently proposed is an extensive tract of land that is not of local character, nor is the majority of it accessible and therefore is too large to be considered for designation as LGS; and
- While the area proposed may contain some land that is special enough to meet the high bar for LGS, not all of it does and this land is therefore not appropriate for designation.

4 CONCLUSIONS

4.1 In landscape terms, in relation to the test contained within the NPPF, the two main criteria for LGS allocation are:

1. That the land in question is 'demonstrably special to the local community' (NPPF paragraph 107b); and
2. That the special nature of the land is such that it justifies a level of protection from development consistent with that provided by green belt (NPPF paragraph 108).

4.2 With regard to the site being 'demonstrably special', while there are some higher quality elements of the local landscape context, namely a mature tree and hedgerow network and areas around Horseshoe Lake, there is no evidence that the particular features of this area of countryside are so special as to justify its long-term protection as an extensive area of LGS.

4.3 EDP's assessment of the site in accordance with GLVIA3 shows that there is no evidence that the site is demonstrably special over and above land within the local context that is not included within the LGS designation. There is nothing that makes the site stand out as having particular local significance with regard to its beauty, historic significance, tranquillity or richness of its wildlife. It is concluded that there is nothing about these aspects of the site that make it "*demonstrably special*" or justify a level of protection from development consistent with that provided by green belt.

4.4 Aside from there being a single footpath crossing the site, EDP has identified no demonstrable evidence that the site is special in any manner which elevates it above a normal tract of edge-of-settlement land. As such, there is nothing which elevates the site to it so demonstrably special that it warrants the degree of protection which LGS designation would provide.

- 4.5 In conclusion, for the reasons examined in this assessment, the proposed allocation of the site as LGS 6 is not reasonably justified based upon objective assessment and appears to be aimed at prejudicing the site's potential in helping to meet housing needs in an edge of settlement location. Overall, EDP considers the site does not meet the test for LGS designation and should not be taken forward as such on this basis within the Neighbourhood Plan.