

Development Plan Team
Bracknell Forest Council
Time Square
Market Street
Bracknell
RG12 1JD

25th June 2026

Dear Sir / Madam

Re: Representations to Sandhurst Neighbourhood Plan 2026-2037 (Regulation 16 Submission Version)

Beechcroft Developments Ltd welcomes the opportunity to comment on the submission version of the Sandhurst Neighbourhood Plan and wishes to make a number of representations as set out below.

Established in 1984, Beechcroft Developments Ltd is a small-medium sized housebuilder operating across the southern counties. Our focus is on small and medium-sized sites in towns and villages and we specialise in the creation of aspirational, high quality housing developments for independent people over the age of 55.

National Planning Practice Guidance (NPPG) on 'Housing for older and disabled people' (2019) highlights that the need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to around 3.2 million.¹ Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. The Government's objective on ensuring the specialist housing needs for older people are met and the importance to be attached to this objective is therefore clear.

To explore this issue, the Government appointed an independent Older People's Housing Taskforce in May 2023, which included representatives of numerous bodies including the Housing LIN. The Taskforce's objectives were to examine enablers to increased supply and improving the housing options for older people in later life, and to explore ways to unblock any challenges. The Taskforce's conclusions were published within a report entitled '*Our Future Homes: Housing that promotes wellbeing and community for an ageing population*'² alongside an important Written Ministerial Statement³ which endorsed the conclusions of the Report and emphasised the importance of addressing specialist older peoples housing within the wider target of delivering 1.5m homes across the Parliament.

¹ [Housing for older and disabled people - GOV.UK](#)

² [Our Future Homes: Housing that promotes wellbeing and community for an ageing population - GOV.UK](#)

³ [Written statements - Written questions, answers and statements - UK Parliament](#)

The Older Persons Housing Taskforce Report and the accompanying Written Ministerial Statement sets out the critical nature of meeting older people's need and the very strong support that should be provided to such schemes.

Our representations are as follows:

Policy NP/H1: Housing

Policy NP/H1 outlines circumstances in which proposals for development within the neighbourhood plan area will be supported. The policy objectives are defined as:

- *'To promote development of affordable and starter homes; and*
- *To promote the development of brownfield sites.'*

However, it is our view that the policy wording will not maximise the extent to which these objectives will be achieved. Part a) of the Policy confirms support for affordable and starter homes. The supporting text to the policy confirms that 'affordable' in this context aligns with the definition within Policy LP16 of the Bracknell Forest Local Plan.

The policy support for affordable housing and starter homes is derived from the 'residents consensus on preferred development' (questionnaire) presented in Appendix 2 of the Neighbourhood Plan and referred to within paragraphs 3.2 within the main body of the Neighbourhood Plan submission document.

Paragraph 3.2.3 states in respect of Q11 (of the questionnaire) on the need for different types of housing within the Sandhurst neighbourhood plan area:

- I. There is low need for four-bedroom and a moderate to low need for three-bedroom homes.*
- II. There is a moderate to high need for two-bedroom homes.*
- III. There is low need for one-bedroom homes*
- IV. There is a high to moderate need for starter homes.*
- V. There is a low need for private rental, social and houses in multiple occupancy.*
- VI. There is low need for retirement homes.*
- VII. There is little or no need for traveller pitches. This comment supported by the existing provision of extensive mobile home sites located in Crowthorne near to the northwest Sandhurst boundary.*

It is curious that the summary at paragraph 3.2.3 suggests there is a low need for social housing (see point v), otherwise known as a form of affordable housing, despite this type of housing being afforded support through Policy NP/H1. We know from the sub-text to the policy (as relayed earlier) that the reference to 'affordable housing' reflects that defined in Policy LP16 of the Bracknell Forest Local Plan. 'Starter homes' are also no longer a recognised form of affordable housing within the glossary definition within the NPPF, and therefore are a separate form of housing. No other form of housing with an identified 'low need' is afforded support through Policy NP/H1.

The summary at paragraph 3.2.3 is also not a completely accurate representation of the data. In respect of social (affordable) housing, the most frequent response rate within the questionnaire was of 'no need.' The second most frequent response rate was of 'moderate need' and equally 'no opinion.' The response rate for 'low need' was actually the lowest amongst the options available to respondents. It is therefore difficult to correlate the 'low need' provided within the summary and what the data shows.

As a further example, the response rate for retirement homes was almost equal between 'moderate need', 'low need' and 'no need', yet the summary provided at paragraph 3.2.3 confirms that residents identified a low need for this type of housing. This is despite, by our interpretation, around 58% of respondents expressing some level of need for this type of housing within the Sandhurst neighbourhood plan area, with the remainder comprising 26%

stating no need and 16% with no strong opinion. A majority identifying a need for more retirement housing, to varying degrees, in our view is a clear indicator that there should be policy support within the Neighbourhood Plan for this type of housing.

It is noted that a site allocated for development within the Bracknell Forest Local Plan (Derby Field) through Policy LP7 is anticipated to deliver an element of 'specialist housing for older people.' However, it is not considered this provides sufficient justification for the absence of policy support for retirement housing in Sandhurst Town parish for the following the reasons:

1. The Derby Field site falls outside of the Sandhurst Neighbourhood Plan area. Respondents have identified a need for retirement housing within the Sandhurst parish limits;
2. Criterion i of the site allocation policy for Derby Field (LP7) states: '*Approximately 220 residential units (including 35% affordable homes; and provision of specialist accommodation for older people...*' (our emphasis). The term 'specialist accommodation for older people' is broad and captures a wide range of housing types. The PPG includes definitions of the different types of specialist housing designed to meet the diverse needs of older people (ID: 63-010-20190626⁴) to include, inter alia, sheltered housing, age-restricted housing, extra-care housing and care homes. All of these types of housing are different in terms of how they operate and the level of support and independence available to residents. Policy LP7 does not define the number of units to be delivered as older persons housing or the form of housing by reference to the PPG definition. For instance, a care home could be delivered on that site which would not meet the identified need for retirement homes within Sandhurst.
3. Despite the policy criteria identified above, there is no certainty that older persons housing will be delivered at Derby Field. The provision of older persons housing often requires involvement of a specialist provider. As no proposals are forthcoming to date for the development of the site, there is no guarantee that such a provider will be involved or have input into any such scheme.

In addition to the above, as currently worded it is considered Policy NP/H1 does not fully accord with Policy LP3 (Sustainable Development Principles) of the Bracknell Forest Local Plan. Criterion 1 of Policy LP3 provides support for 'development which *'provides suitable land / buildings to help meet development needs.'* Paragraph 5.36 as supporting text to Policy LP3 states that, from a social dimension, sustainable development is realised '*by providing a supply of housing, including affordable homes of an appropriate mix and type to meet the needs of existing and future residents. This will include the provision of specialist accommodation for the increasing proportion of older people, where appropriate*' (our emphasis).

Given the limited areas of support for housing set out within the current drafting of the Policy NP/H1 and areas of identified need arising from the residents questionnaire, it is not considered the policy meets the requirements of Policy LP3.

Part b) of Policy NP/H1 states '*encouragement will be given to appropriate density development proposals on brownfield sites within the settlement of Sandhurst.*' We consider the policy to be ineffective and unclear for the following reasons:

1. It mixes the requirements to achieve appropriate densities with support for the redevelopment of brownfield sites. These matters should form separate policy requirements;
2. As a result of the above, the policy reads as though encouragement is given to the appropriate densities, as opposed to encouragement for the redevelopment of brownfield sites;

⁴ [Housing for older and disabled people - GOV.UK](https://www.gov.uk/guidance/housing-for-older-and-disabled-people)

3. The use of the term 'encouragement' as opposed to 'support', the latter of which is used in part a) of the policy. To better convey the intention of the policy objective (i.e. promote the development of brownfield sites), we suggest use of the word 'support' which is stronger and a clearer direction to the decision-maker in considering planning applications;
4. The focus on the redevelopment of brownfield sites within the settlement of Sandhurst is too narrow and presents a missed opportunity to provide support for the redevelopment of underutilised or redundant brownfield sites outside of the settlement boundary. Such sites can be used to meet identified housing needs and present opportunities to provide improvements to the character and appearance of an area through removal of unsightly, unfit for purposes or unused buildings or land whilst preserving greenfield (undeveloped) sites.

The above issues can be overcome through amendments to the policy wording which removes reference to 'appropriate densities' (this requirement can be added to another policy focusing on scale of development or character and appearance of an area for example) and provides clear support to the redevelopment of all brownfield sites within the Sandhurst neighbourhood plan area, subject to compliance with other policies within the Plan.

Part c) of Policy NP/H1 does not accurately reflect the requirements of Policy LP32 of the Bracknell Forest Local Plan. It simply states '*no net increase in dwellings within 400m of the TBH SPA and the provision of mitigation measures for new dwellings outside this area.*' Policy LP32 adds an exception whereby the provision of a net increase in dwellings within the 400m zone of influence would be acceptable. It states there should be not net increase in dwellings '*unless it can be demonstrated through a Habitat Regulations Assessment that there will be no adverse effect on the integrity of the SPA.*'

In order to overcome this conflict, part c) of Policy NP/H1 could state 'Development proposals that occur within zones of influence of the Thames Basin Heaths Special Protection Area (TBH SPA) must comply with policy BFLP Policy LP32', removing the conflicting text. However, this would simply repeat the requirements of Policy LP32 as proposals for development on sites located within the Sandhurst Neighbourhood Plan area would still be assessed against the Bracknell Forest Local Plan and policies within in any event. As such, our recommendation is that part c) be deleted altogether as it adds nothing further beyond Policy LP32.

A neighbourhood plan must meet the 'basic conditions'⁵ in order to proceed to referendum. One of these conditions is that the neighbourhood plan must be in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). Another basic condition requires the neighbourhood plan contributes to the achievement of sustainable development. Policy LP1 (spatial strategy) of the Bracknell Forest Local Plan conveys the above conditions, stating:

'The Council will support development proposals in accordance with 'made' neighbourhood plans. It will also guide communities preparing or reviewing neighbourhood plans and developing policies where evidence indicates a need to address particular local requirements. Such policies will reflect the overall strategy for the scale and distribution of development set out in the strategic policies of this Plan' (our emphasis).

The above confirms that policies within neighbourhood plans must reflect the strategic policies within the Bracknell Forest Local Plan and develop policies where evidence indicates a need to address local requirements, i.e. to meet identified needs. The current iteration of the Sandhurst Neighbourhood Plan does not achieve this.

On the basis Policy NP/H1 does not fully accord with policies LP1 and LP3 and in light of our comments above, we are of the view that the current version of the Sandhurst Neighbourhood Plan does not meet the basic conditions necessary for the Plan to progress.

⁵ As set out at paragraph 8(2) of Schedule 4B of the TCPA 1990

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

As per our comments on Policy NP/H1, we consider the current wording of Policy NP/H2 to be too narrow in scope in terms of locations where development will be supported. This risks not achieving the specified objectives of Policy NP/H1.

We therefore recommend part b) of the policy includes additional wording which sets out circumstances where development outside the settlement boundary of Sandhurst would be acceptable, for instance the redevelopment and repurposing of previously developed land (brownfield sites), amongst others. In lieu of allocating specific sites for development within the Sandhurst neighbourhood plan area, providing additional circumstances whereby development would be permitted outside of the settlement area would increase chances of successfully achieving the policy aspirations and objectives of the plan whilst still adhering to the environmental objectives.

Policy NP/D2: Residential developments on Brownfield Sites, Infill Sites and Development of Residential Gardens within the settlement of Sandhurst.

Policy NP/D2 is a design-related policy and the general thrust of the policy is supported insofar as the aim is to ensure new development proposals harmonise with the character and appearance of the area and adverse impacts on existing neighbouring land uses are avoided or mitigated. Given our comments on policies NP/H1 and NP/H2 and benefit in indicating circumstances in which support will be given to the development of brownfield sites outside of the settlement boundary, we consider the title of the policy should remove reference to *'within the settlement of Sandhurst.'* The aim of the policy would remain and the majority of the criteria (subject to our comments below) would still be relevant. This change would not therefore alter how the policy would operate, simply that it would also capture development proposals on sites outside of the defined settlement area.

It is not fully understood what the purpose of criterion 'j' is, particular the reference to the 'landscape value' of residential gardens. The policy does not define how to determine the landscape value of a residential garden. Typically, the landscape value of gardens are low as they are private with no public access or views and designed or arranged as such to be used as outdoor amenity spaces and private recreation. Accordingly, the lack of clarity or intention means it would be difficult for a decision-maker to interpret when assessing development proposals. We therefore recommend criterion 'j)' is deleted.

Policy NP/D4: Tree and Hedgerows

The wording to Policy NP/D4 is long and, in places, convoluted. There remains the opportunity to streamline the policy significantly whilst still securing its aims.

Criterion '1' requires retention of all mature and important trees, groups or woodland. It does not take into account an assessment of the quality of the trees. Generally, category U or C class trees do not pose a constraint to development proposals in planning terms. Whilst preferably such trees should and would be retained, the removal of these category trees can readily be mitigated through new planting. Category A or B trees require more robust justification for removal. Criterion '1' should therefore acknowledge these different considerations.

Criterion '3)' requires the planting of equivalent species however this may not always be appropriate. For instance, the planting of new Ash trees is generally avoided given the implications of the disease Ash Dieback. This point is covered to an extent within criterion '5' therefore it makes sense that these points are combined within the same criterion. Criterion '5' is also bloated and in our view can be split into two separate criteria: The first relating to the planting of disease-resistant species (which as per our comments above should accompany the wording to criterion '3'); and the second stating *'Planting that contributes to the biodiversity of the area and supports green corridors will be supported'* to form a separate criterion.

The most significant concern is the requirements of criterion '7'. The policy criterion relates to replacement planting following tree removals and goes above and beyond any requirements within the Bracknell Forest Local Plan. The policy suggests use of a 'pro-rata replacement calculation' in determining the requirements of a development proposal and advises any tree proposed for removal which has a trunk diameter of 80cm or greater would require the planting of 8 new trees. It then goes on to state *'In situations where an applicant is able to robustly demonstrate that compensatory planting cannot be provided on-site, BFC and/or STC will secure off-site in-kind works or a financial contribution for off-site tree compensatory planting as part of a planning permission, with a preference for provision close to the site.'*

The requirement to replant 8 no. new trees following removal of a single tree is considered excessive and, in our view, not justified – particularly given the mandatory national planning requirement for development schemes to comply with biodiversity net gain legislation. Furthermore, it is unclear how a financial contribution towards compensatory tree planting would work in practice and how it would be secured. The policy also does not explain how such a contribution would be calculated i.e. the formula to be used. It is our view such a contribution conflicts with the provisions and requirements of biodiversity net gain which, inter alia, requires development schemes to result in a minimum 10% net gain in biodiversity. The BNG Metric Calculator would also capture tree losses and advise what mitigation would be required in order to meet the 10% requirement.

To summarise, we believe it should be left to the BNG Metric calculator to determine the appropriate level of mitigation required for development schemes including concerning tree removals. Accordingly, criterion '7' of Policy NP/D4 should be deleted.

Policy NP/EN1: Development in the Blackwater Valley Corridor and the Crowthorne/Sandhurst Heathland

The policy appears to simply repeat the wording of Bracknell Forest Local Plan Policy LP36 with the exception of not identifying the landscape character areas set out in part 1 of that policy. Accordingly, Policy NP/EN1 does not appear to add anything beyond the existing requirements of the Bracknell Forest Local Plan. As planning applications will be assessed against both the Sandhurst Neighbourhood Plan (should it proceed to referendum and be 'made') and the Bracknell Forest Local Plan, Policy NP/EN1 is superfluous and should be deleted.

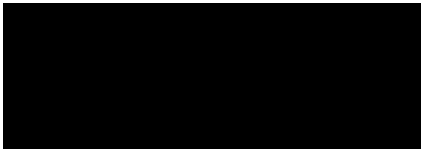
Policy NP/T1: Traffic Congestion

We suggest a minor amendment to reference NPPF paragraph 116 within the policy to ensure use of the term 'severe' is consistent with national planning policy.

Policy NP/T2: Safe pedestrian and cycle routes

The policy does not define 'medium' or 'large' developments and therefore it is difficult to determine which scale of proposals would be captured by the policy requirements. The policy should specify what is meant by 'medium' and 'large' developments.

We trust you will consider the above representations and look forward to receiving your formal acknowledgement.



Senior Planning Manager