

Sandhurst Neighbourhood Plan

The following response has been produced by the Neighbourhood Plan Steering Group (Working Group) on behalf of STC in respect of Regulation consultation 16 comments received. Notification of the Regulation 16 responses were notified by BFC to the Steering Group via an email of 16th July 2026.

Responses relating to comments received from **Bloor Homes (Turley) and Beechcroft Developments** have been included within separate and individual responses. However, where their comments overlap with the BFC comments, reference should also be made to the following.

Steering Group comments made relating to BFC's Regulation 16 response and specific requests made by the Examiner: -

The following commentary includes responses to BFC comments and related Examiner's requests.

The Steering Group have included a specific response to the Examiner's request relating to NP Policies D 4, EN 5, T 3, T 4, C 1, C 2, C 3, C 4, and ERB 1. Related responses are included following the appropriate BFC comment reference as some of their content has a related theme and includes similar response evidence. They have, however, been given a separate title such that they can be identified as being specific to the Examiner's requests.

In respect of the Examiner's comment regarding the potential overlapping of policies with the BFLP related comments have been expanded and included within the appropriate BFC referenced response.

The intention of the Steering Group's comments is also to aid the examination process by highlighting matters that are in agreement (common ground) with the BFC comments. The Steering Group have also summarised matters, within the applicable section, that are considered to be disputed and/or contain potential errors and omissions.

Comments relating to BFC's introductory letter and references to their items A to G have also been made where appropriate.

Whilst it should be the intent of an NP not to duplicate the policies and content of a Local Plan it may be that minor duplication is likely to be inevitable if such comment is considered to assist with the understanding of a particular NP policy. The NP has, however, tried to keep this to a minimum.

The headings of each Steering Group response use the same headings as the BFC comment schedule (BFC's Appendix 1). Where the response is lengthy it has been allocated paragraph numbers for ease of reference

BFC, within their covering letter of 30th June 2026, also included many matters where they considered the NP did not meet basic conditions. Response to these matters is also included below.

In respect of the Examiner's comments regarding the receipt of policy and document responses it is hoped that the related responses to the Examiner and comments made in respect of BFC, Bloor Homes and Beechcroft Developments are hoped to be complete and would enable the examination process to continue. Clearly if it is considered that any of our responses have not included a comprehensive response, please get back to us such that the appropriate action can be instigated.

Response to BFC's covering letter of 30th June 2026: -

Please note that the responses to the BFC letters are summaries only. For more detailed information refer to similar matters that have been included within the responses to BFC's Appendix 1.

Strategic Environmental Assessment and Habitats Regulations Assessment: -

We do not accept BFC's comments. Please refer to the response to NP/D 3 within the response section to BFC's detailed comments. We do not accept that Policy NP/ D 3 has been substantially rewritten, and by inference has been extended and enhanced. The only changes we have made to the Regulation 14 addition was to incorporate some of BFC's comments in an effort to improve clarity. We would add that nothing was added to the Regulation 15 version of the NP to change the fundamental intentions of the Regulation 14 document.

Legal compliance requirements: -

Policy NP/ D 4. We do not accept BFC's comments that the policy '*will not in themselves mitigate the impact*'. We consider that policy NP/ D 4 would, indeed, contribute to climate change improvement. This achieved by a designated quantum and quality of replacement trees being defined. We are of the view that if the replacement conditions included with NP/ D 4 were not in the NP there is a high probability that replacement trees would be of a lesser quantum. We note that BFC have not produced any evidence to support their comments.

Policy NP/EN 1. In respect of matters relating to restoring the valued features of the surrounding landscape character we would refer BFC to a whole raft of NP Policies and related paragraphs that describe in some detail measures that do, indeed, support the NP's intentions to restore the valued features of the surrounding countryside. It is considered that BFC should not concentrate on a single NP Policy without making reference to many other Policies that have a related theme. If BFC took an overall view on all NP Policies and related explanatory notes it should be apparent that the NP does support restoration

and enhancement of the Blackwater Valley Corridor and the Crowthorne/Sandhurst Heathland.

Policy NP/ T 3. The prime objective of Policy NP/T 3 is to reduce potential on-street parking on existing and generally narrow streets. The Policy introduced in an effort to not exacerbate much partial parking on footways and to improve potential access for emergency vehicles. It is not considered that these key improvements should be disregarded on the basis of a very remote possibility (and without evidence) that it may not encourage the use of sustainable transport modes. In respect of limits within Sandhurst relating to rail and bus services we would refer BFC to the raft of evidence contained within the NP that records limits and restrictions on their use. We would also remind BFC that the NP supports and encourages improved footpaths and cycleways.

Matters associated with Berkshire Local Nature Recovery Strategy. One of the objectives of the NP's designation of Local Green Spaces LGS 6 and LGS 7 is to provide additional protection from development by the land having a similar designation as 'green belt'. We would refer BFC to the raft of Policies and explanatory notes contained within the NP and NP Appendix 1 that provide evidence to the apparent support of the intentions of the LNRS, where such support is within the remit of a NP. We, would, however, note that managing land following its designation is beyond the scope of an NP. In respect of potential management of private land that has been designated as Local Green Space and occurs on private land we would refer BFC to the appropriate Government guidance notes.

We would also refer BFC to the liaison we have had with Finchampstead Parish Council regarding a joined-up approach to improving the Grove Lake Nature Reserve.

In respect of BFC's Priority 4 comment we would note that the success of the Horseshoe Lake as a visitor attraction is very much dependent on the area possessing a rural ambience. Without a rural ambience it is extremely likely that public visitor numbers will fall; particularly dog walkers. Should the Horseshoe Lake surrounding countryside take on the appearance of an urban park it will be inevitable that many current visitors will transfer to areas of the TBH SPA, particularly as much of the TBH SPA possesses a rural ambience. It is therefore averred that by designating LGS 6 and LGS 7 as Local Green Space such designation will mitigate potential increased visitors to the lands that include the TBH SPA. In the coming years this is considered vital as many new housing developments (both within areas covered by BFC and other nearby Authorities) will come to fruition and will result in additional visitor numbers to Horseshoe and Grove Lakes. We would also refer BFC to the volume of evidence contained within the NP and NP Appendix 1 that stress the important benefits of the elevated field margins that are included within LGS 6 and LGS 7.

In respect of Priority 8 we would remind BFC that managing a Local Green Space is beyond the scope of a NP. However, the point can be made that if the Local Green Space exists other and separate arrangements can be made by the Council(s) regarding management procedure.

We do not accept BFC comments regarding Priority 12 relating to the inclusion of LGS 6 and LGS 6 not assisting in the protection of the TBH SPA. Please refer to the comments made above that are associated with Priority 4.

We do, however, note that BFC accept that, where relevant, the NP accords with the intentions of the Berkshire Local Nature Recovery Strategy.

Responses to BFC's Appendix 1 (including matters associated with BFC's comments in relation to basic conditions): -

Map 1 page 7. We are happy to replace Map 1 with fig 1 that was included within BFC's SEA determination (Appendix 7 of the NP). If this were instigated, it is assumed that BFC would acknowledge that the Map coincides with national policy.

Paragraph 1.1.8. F and G (Strategic Environment Assessment). We would be happy to remove the last sentence that follows '*within Appendix 7*'. If this were to be instigated, it is assumed that BFC would acknowledge that there is no breach of EU regulations as it complies with the habitat requirements.

Map 2. We are happy to for a legend to be added to include what the red boundary line means together with the note that the blue line is the STC boundary and where relevant the Surrey Heath boundary. We would assume that if this definition were to be included that BFC would acknowledge that the map complies with national policy.

Paragraph 3.3.5. We are happy for an update to include the wording such that both references read 'may be able to afford'. We would assume that if this change is made that BFC would accept that the para complies with national policy.

Objectives Housing (NP page 19). Steering Group comment: - The objectives should add 'within the settlement of Sandhurst' after 'brownfield sites'.

NP/H1. BFC are reminded that previously they had asked us to specifically include a 'starter homes' definition.

- 1 In many situations within Bracknell where medium and/or large sites have been included within the Local Plan, there is a requirement to include a percentage of social housing referenced as affordable housing. However, there are no related sites included within Sandhurst and as a consequence the NP sets out to encourage homes that could be affordable to first time buyers on the open market. This follows overwhelming encouragement from Sandhurst Residents (via questionnaire responses) for this type of potential development.

- 2 The NP therefore sets out to cover two situations: - firstly, to include comments relating to the preference for 'starter homes' within Sandhurst; and secondly if a future planning application were to be submitted that was of a medium or large in size the BFC requirements for affordable housing may then need to be considered.
- 3 Would be happy to update wording such that NPPF 16 d) and PPG Para 042 comments regarding 'clearly written and inambiguous' apply, and on the basis that the intent to support starter homes is made. Would welcome any positive BFC comments.
- 4 The comment should, however, be taken that the NP is not preventing planning applications from being made for larger homes where they are compatible with the surrounding area/ street scene.
- 5 The intent of NP/ H 1 is that overall preference should be given to starter homes.

NP/H1 criterion c). We incorporated BFC's previous comments, however, there is no problem for this to be included within an explanatory text.

NP/H1. Potential additional guidance notes regarding appropriate density: - We feel it would be impractical to include precise data regarding 'appropriate density', at this stage, as it would relate to an unknown application in an unknown location. In determining 'adequate density' we would expect a Planner to consider all matters relating to a particular application and make a subjective judgement based on the general parameters set out within the BFLP and the NP. Clearly such consideration should take into account matters such as: - size and shape of the site, access points, the nearness of adjacent buildings, privacy, whether the site was located on a hill, the nearness of any pylons, services, flood plain, retention of key trees, parking and any other matters that may have an impact on density. If BFC have any positive comments to assist with the above these would be welcome.

We, therefore, do not accept BFC assertion that policy NP/ H1 does not comply with national policy.

Comment on potential overlap with the LP: - One of the housing desires of the NP was to place emphasis on encouraging 'Starter Homes'. Starter homes being identified as a need in Sandhurst, particularly as very few had been constructed in recent years. The encouragement of Starter Homes was of key importance as there appeared to be limited or no opportunity for Affordable Housing provision due to no medium or large sites in Sandhurst identified within the BFLP. It is assumed that the foregoing does not overlap with the LP.

Para 3.7.5. We would hope that clarification regarding the provision of Affordable Homes is qualified by the NP explanatory notes contained within NP paras 3.7.2 to 3.7.4. The intention of para 3.7.5 was to cover the likely situation of no suitable sites containing Affordable Homes occurring as no medium or large sites have been identified within the BFLP and no like sites have been included within the NP. Be happy

to add any positive comments that BFC may have that clarify the intentions of the NP/H1.

NP/H2. The NP does note where the settlement boundary map can be found, refer to para 3.9.4.

Comment on potential overlap with the BFLP: - There could be certain repeats of matters included within the BFLP. However, the intent of the NP is to emphasise the importance of not encroaching on the valued and specifically defined green areas that surround Sandhurst. The NP policy was drafted to reinforce the need to concentrate on development within the Settlement areas.

Para 4.2.2 v). Happy to remove the word. 'new' and replace with 'a net increase in'.

NP/D1.

1 We do not agree with BFC's comments that 3 storey limits should be removed. The limit to 3 storeys has been included to reflect many comments received (via questionnaires and workshops) that Sandhurst is desired to have a village feel. This applies particularly as Sandhurst does not have a specific town centre, it being formed around a number of small retail centres. The characteristics of Sandhurst are, of course, very much different to that of Bracknell Town Centre, which contains many high-rise buildings.

2 The policy does not restrict flat development providing they are not more than 3 storeys in height. We would note that all of the current blocks of flats in Sandhurst (and particularly Yorktown Road) are no more than 3 storeys in height. It is the intention of the NP that any new and similar developments reflect the height and general appearance of the existing and nearby buildings. It should also be noted that there are no commercial buildings in Sandhurst that are more than 3 storeys. To limit the heights of new buildings to 3 storeys coincides with NPPF 135 c) in that they are '*sympathetic to local character* -----'.

3 We would also note that comments relating to permitted development of additional floors is covered within para 4.3.4. We consider that Para 4.3.4 reflects the intentions of NPPF para 125 e). We would emphasise BFC's comments regarding NPPF para 125 e): - '*where the development would be consistent with the prevailing form of neighbouring properties and the overall street scene*'. As noted previously there are no buildings within Sandhurst of more than 3 storeys.

We would, however, be happy to add wording to NP para 4.3.2 to include '*and also NPPF para 125 e*).

4 With reference to Appendix 5 (Sandhurst Study Area) it is impractical to provide a detailed character assessment to all streets and or areas. What the character assessment/ study does do is to provide salient comments for typical areas

within Sandhurst. The general theme of the study is clearly to produce a village feel with background trees.

- 5 The reference in the assessment for Central Sandhurst (recommendation 7) does not suggest that storey heights should be disregarded. It recommends only that density could be higher than in nearby areas likely to contain many detached houses. This could include blocks of flats of no more than three storeys. This is supported by the Study's comment that *'the linear small scale plot pattern should be retained in the southern part'*.
- 6 There are no particular areas within Sandhurst that are fully characterised by bungalows. Where bungalows exist, they are interwoven with (generally) two storey dwellings. Many Sandhurst bungalows also have loft conversions to turn them into a 2-storey dwelling. We are therefore unclear what point BFC are making with their reference to bungalows.
- 7 We therefore dispute that NP policy NP/D 1 does not have regard to national policy and does not contribute to sustainable development.

Para 4.3.4. We would be happy for the adding of wording to link 'are supported providing that such extensions are sympathetic to local character and history' with the desire to limit storey heights to 3 storeys. As noted elsewhere there are no existing buildings within Sandhurst of greater than 3 storeys. Therefore, any extensions greater than 3 storeys will be extremely unlikely to comply with 'being sympathetic to local character'.

Based on the above comment we do not consider that para 4.3.4 does not comply with national policy.

NP/ D 2. We do not accept that NP/D 2 lacks location clarity. The introduction describes that it relates to *'Residential developments on Brownfield sites, infill sites and development of residential gardens **within the settlement of Sandhurst***'. By this definition it should be clear that it does not apply to the countryside.

NP/D 2. BFC comment 'do not make sense'. We do not understand what part of the policy BFC consider does not make sense. Need clarity on this to make comment.

NP/D 2 b). BFC comment regarding the definition of landscape features. We would be happy for the adding of the definition of *'landscape features are features that define the appearance and character of the nearby area'*.

NP/D2 e). BFC comment regarding what is a modified development. The clause is intended to cover both new and extensions to existing residential properties. Would welcome any BFC comments that expand on this.

NP/D2 j). BFC comment regarding 'landscape value'. We consider this to be relevant and should be read in conjunction with the comments made to NP/D 2 b) above.

NP/D 2 n). We consider that the BFC comments relating to SUDs may be incorrect. We would remind BFC of BFLP Policy LP 57. LP 57 item 1 notes *‘Major development proposals and development in area of risk of flooding-----’*.

As regards BFC’s reference to NPPF para 181 c) we would note that the heading of para 181 relates to *‘ensuring that flood risk is not increased elsewhere’*.

A proposed adjustment to the wording of NP/ D 2 item n) may be to change the words ‘will be encouraged to use’ to **‘will be required to’**. Would welcome any BFC positive comments.

To additionally clarify matters we would suggest that NP para 4.3.5 also includes reference to BFLP Policy 57.

We will agree with the adding of reference to BFLP 27 within the policy’s guidance notes.

When taking cognisance of our related comments we would not accept that NP/ D 2 does not comply with national policy.

NP/D 3. The NP makes reference to BFLP 29 and notes that BFLP 29 also applies. NP/D 3 is intended to reinforce BFLP 29.

Comment on potential overlap with the LP: - It may be that some of the items overlap with the LP. However, the intent of the policy was to summarise all matters, rather than only referring back and forth between the NP and LP. This was instigated for ease of reading / interpretation and to summarise key matters. Policy NP/D 2 also includes a summary of conclusions drawn from the Sandhurst Character Study (NP Appendix 5). The explanatory notes also make reference to the appropriate LP policies.

NP/D 3 BFC comments relating to ‘semi-rural’.

- 1 The NP included the comment ‘semi-rural’ for the following reasons. St Michael’s and All Angels Church is located within the countryside; however, it is immediately adjacent to the settlement of Sandhurst. The intention of the introduction of the comment ‘semi-rural’ was to ensure that any development within the settlement of Sandhurst that was nearby to the Church did not impact on its appearance. Would be happy to enhance the intentions of the NP with any BFC positive comments.
- 2 In respect of comments made within BFC’s covering letter, dated 30th June 2026, (second page regarding the SEA report of October 2025) we would reiterate that we consider that their comments are in error. NP/D 3 does not include conversion and enhancement of Grade II* Grade II listed and locally listed buildings. The NP within para 4.3,8 simply clarifies that BFLP Policy LP 29 would apply should any conversion or enhancement of listed buildings occur in the future.

- 3 In respect of BFC's comments on 'views' we would be happy to include a related guidance note para. Would welcome any BFC positive comments on this.
- 4 Notwithstanding the above we would be happy to add an explanatory para (say as 4.3.9) that notes: - In respect of the heritage setting of St Michael's and All Angel's Church reference should be taken from the Historic England document 'The Setting of Heritage Assets 'Historic Environment Good Practice Advice on Planning' current edition. This document describes in detail matters associated with the intentions of maintaining 'Settings and Views'.
- 5 The above document should be added to the NP reference documents as 'Historic England, The Setting of Heritage Assets. Historic Environment Good Practice in Planning Note e (Second Edition). We note also that BF's Local Plan on page 180 does also reference this document (Historic England's National Heritage).
- 6 There is a typo within NP Policy title NP D 3. Remove (All Saints) and replace with (All Angels)
- 7 It is considered that of the comments above are instigated there would be no conflict with NPPF paras 207 and 208.
- 8 We would, however, remind BFC of NP para 4.3.8 that noted that BFLP Policy LP 29 also applies.

NP/ D 4: -

NP/ D 4. Criterion 3. We would be happy for criterion 3 to be qualified by the comment that it relates to the trees and hedgerows described within the preceding **criterion 1) and 2)**. In respect of BFC's comments regarding alleged non-compliance with NPPF 136 please refer to related comments covered elsewhere within our general comments to NP D 4.

NP/D 4. Criterion 4. We would be happy to change the word (*could be*) to 'is'.

NP/D 4. Criterion 6. In respect of timescale, we would hope that reasonable Planner's judgement could be used to determine a reasonable timescale. The Steering Group consider that simple checks on previous site conditions could be made using Google Earth (this includes access to current and previous street scenes). A Planner could also check recent planning applications for the related site (both those approved and those refused) to see if there were any fundamental changes to the trees and hedgerows on that site.

The point the NP is making is to try and circumvent a situation where a potential developer removes significant trees and hedgerows before making a planning application. When the planning application is made there are no or reduced trees on

site. As a consequence, an inappropriate assessment of the site could result. We are aware that such situations have recently occurred nearby to Sandhurst.

We do not consider that the intentions of the NP are ambiguous. We therefore consider that the NP complies with NPPF para 16 d). However, if BFC have any positive comments to enhance the intentions of criterion 6 (without removing it) they would be welcome.

We would, however, be happy to add 'reasonable' before 'evidence' in respect of criterion 6, if this is considered to help.

NP/D 4. Criterion 7

- 1 We do not accept BFC comment that the item is not related to Sandhurst. It is a common view and has been outlined within the NP is that the majority of areas within Sandhurst are of mediocre architectural value and therefore the occurrence of trees and hedgerows greatly enhances the appearance of the town. NP/D 4 has been drafted to ensure that the beneficial appearance of the Town is not reduced. Key to this objective is the occurrence of trees within the townscape and the objective of this to continue for future generations to enjoy.
- 2 As a general comment we have viewed many Neighbourhood Plan policies from all over the country and have adapted what are considered the most appropriate for Sandhurst. Just because similar wording has appeared within other NPs it should not preclude it from being used within the Sandhurst NP, if it is considered appropriate.
- 3 Our prime evidence is that Sandhurst is generally of older design than many other areas within Bracknell and Bracknell being a new town. Many of the buildings (including housing) in Sandhurst (as noted above) are of mediocre architectural merit. Both foreground and background trees greatly improve the appearance of the Town. Therefore, the key to keeping Sandhurst architecturally attractive is to retain trees and/or replace them if needed. The benefit of background trees to improve the appearance of Sandhurst is also made within NP Appendix 5 (Sandhurst Character Study).
- 5 The point that we have made previously is that if other Planning Authorities have made a similar policy work, why do BFC argue they cannot. Clearly other Planning Authorities found it fitted perfectly within their legal framework. BFC's comment regarding '*there being no legal framework*', is rather vague. If the policy is to be enhanced, it would be advantageous to hear from BFC the precise legal framework to which they are referring. We would also welcome any positive comments from BFC that may attempt to clarify their concerns regarding compliance with legal framework.

6 We would be happy to add a clarification note that trees of a non-native species be replaced by native species.

7 Policy NP/ D 4 sets out to fully support NPPF 136. The following comments are intended to provide evidence of that support: -

There is nothing within Policy D 4 that is contrary to: -

- a) Trees making an important contribution to the character and quality of urban environments.
- b) Helping to mitigate and adapt to climate change.
- c) Ensuring that new streets could be tree lined.
- d) That opportunities are taken to incorporate trees elsewhere, such as parks,
- e) Existing trees are retained wherever possible.
- f) Applicants are encouraged to work with highways officers and tree officers to ensure that the right trees are planted in the right places and solutions are found that are compatible to highway standards.

It is therefore considered that Policy NP/ D 4 complies with the intentions of NPPF 136. We would reiterate the comments made above and would be happy to add wording to NP para 4.3.11 that also included '*enhances and supports the intentions of NPPF para 136*'.

8 Where replacement trees cannot be practically included within a development policy NP/ D 4 allows for planting to be instigated elsewhere. This could include areas within the Blackwater Valley Corridor (including Shepherd Meadows, Memorial Park), Snaprails Park and Owlsmoor Park). The intention being that applicants can work with the Council(s) including highways and tree officers to ensure the trees are planted in the right places to acceptable standards. In this regard Policy NP/ D 4 is considered to be fully compliant with the intentions of NPPF 136.

9 The Steering Group do not accept BFC's comment that NP/ D 4 is too onerous (as noted above similar policies have been successfully implemented by other Authorities). It is not considered that Policy NP/ D 4 prevents sustainable development. In the scheme of things defining the scale and number of replacement trees is only a very minor expense when compared to all land purchase, construction and planning cost that may be involved in progressing a development.

10 The Steering Group would also remind BFC that their LP does include for compensatory planting and or off-site in-kind works or a financial contribution. The related explanatory paragraphs are included within LP para 17.29 (page 277).

11 We do not understand what point BFC are trying to make as regards noncompliance with NPPF para 32. NPPF 32 notes: - '*The preparation and review of all policies should be underpinned by relevant and up-to date evidence. This*

should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned and take into account market signals’.

The justification of the NP policy is to ensure that the pleasant ‘green’ backdrop to the Sandhurst general mediocre value buildings does not reduce. This is supported by the evidence provided within NP Appendix 5 (Sandhurst Character Study). The Character Study supports the importance of the background trees and hedgerows to maintain a pleasant architectural appearance. It should be additionally noted that feedback from liaison with Residents noted they were in favour of maintaining the ‘green’ backdrop to the Town’s (generally mediocre) landscape. The Steering Group do, therefore, not accept BFC’s comments regarding alleged noncompliance with NPPF para 32.

The intention of the NP is to expand on the BFLP by adding more detailed information to establish the quantum of trees to be replaced. This instigated as the BFLP is ‘light’ on the quantum.

Based on the adjustment notes above we consider that the NP would have no conflict with either NPPF para 136 or BFLP Policy 54. We also would note the para 4.3.11 does include reference to BFLP Policy LP 54.

Response to Examiner’s D 4 comments: -

- 1 A clear method for establishing the quantum of the replacement trees is considered to be included within Policy D 4 item 7. As noted above BFC comments regarding the replacements trees to be of a native species should be either included within the policy or within an explanatory note.
- 2 The aim of the Policy parameters associated with Tree replacement is to ensure that a reasonable quality and quantity of trees replace any sound and mature trees that are to be removed, following any associated development. The concern we have is that if no detailed descriptions are included a large and mature tree of high landscape value could be replaced with a small sapling. Without a clear definition of the quality and quantity of the replacement trees being described within the policy (or explanatory notes) the quality of the architectural appearance of the Town could be reduced. Descriptions regarding the quality and quantity of replacement trees also has biodiversity gain.
- 3 The extent of the replacement trees supports the intentions of the Sandhurst Character Study (Appendix 5) in that it aims to retain the background appearance ‘green’ of the Town. The trees greatly enhance the appearance of the Town when consideration is made that much of the Town has mediocre architectural value.
- 4 Without specifying a quantity for replacement trees there could be reduction to the green background of the Town as future development comes online.

- 5 As noted above BFC do already operate procedure for replacement trees and/or related compensation (refer to item 10 relating to D 4 item 6).

Para 4.3.10. We would be happy to expand on the term '*sustainable replacement trees*' by adding clarification that these prioritise native climate resilient species such as oak, hawthorn or willow (or any other native species that BFC would recommend). We would also be happy to add that any new trees should be disease resistant.

Para 5.4 Map 5. The map has not been specifically produced for the NP. It is a duplication of a Map produced by the BVCP. If it helps, we can add a note to say that the southern boundary to Sandhurst coincides with the route of the River Blackwater. We can also reiterate that the Map was produced by the BVCP to show both existing footpaths and those that the BVCP would wish to encourage. The NP supports the intentions of the BVCP. In respect of public rights of way these are included within the Sandhurst Statistics and Supporting Information document (Appendix 1). We would be happy to add a clarifying note to reference sheet 7 on page 47 of the NP. Will correct the Blackwater typo. BVCP's intention, and fully endorsed within the NP, is to have a continual footpath available for public use near or adjacent to the northern side of the River Blackwater. At present it has sections that are not publicly accessible.

As map 5 is a duplicate of a map produced by the BVCP we do not consider that its inclusion would not be in compliance with national policy.

There could well be a number of potential footpath routes to achieve the objective of providing a continual footpath near or adjacent to the northern bank of the River Blackwater. Therefore, it would be impractical to draft a precise map. The primary objectives are, however, recorded in indicative form on the BVCP produced map.

If further explanation of the above is required we would be happy to provide an explanatory para, This could be added to para 5.4.2.

NP/EN 1. Can add clarification to the policy heading after the wording of '*Sandhurst Heathland*' **that occurs within the Sandhurst Boundary.** Can add reference to Map 4.

Comment on potential overlap with the LP: - There is a degree of overlap with some elements of the LP. However, the intention of the NP was to emphasise the importance of the Blackwater Valley Corridor and the Crowthorne/ Sandhurst Heathland in respect of limited potential developments in the area and measures to ensure wildlife habitats were not eroded. The policies explanatory noted do, however, refer to the LP policies that it supports and enhances.

NP/ EN 2. Happy with the adding of a reference relating to Map 4.

EN/NP 2. The original wording was produced by the BVCP. Would welcome any positive enhancement comments that BFC may have.

Comment on potential overlap with the NP: - The policy emphasises the key matters regarding wildlife within the Blackwater Valley Corridor.

Para 5.4.9. We are unclear what BFC's concern is. Para 5.4.9 notes that NP/EN 2 enhances BFLP policy LP 30. Would, however, be happy to include clarification wording providing the basic intention of the NP is not changed.

NP/ EN 3. Item 1. The semi-rural comment was primarily intended to cover the area in and around St Michael's and All Angels Church (see above). Would be happy to add appropriate wording to clarify this point.

NP/EN 3. Item 2 c). We would be happy to include the comments relating to SUDs drainage to be incorporated within an explanatory note to the policy. Memorial Park is generally located within the Flood Plain area. The intention of the policy is to ensure that any sports related facility, with a hard surface, were to be included it would need to allow for an appropriate SUDs installation. This to prevent nearby sports pitch areas from having an increased flood/ waterlogged risk.

NP/EN 3. Item d). Happy for the inclusion of improved wording to include *'Appropriate levels of parking will be encouraged to avoid causing detriment to neighbour amenity'*.

NP/EN 3. Item 2. The intention of this item is to ensure that say a wildfowl nesting area or key landscape feature was not used for additional recreational activities. Any increase in recreational building or car parking to be selected to be in areas that do not impact on the major landscape features or conservation interest. Would welcome any positive BFC comments that enhance the intentions of this policy.

NP/EN 4. Item 2. Happy with the removal of the words *'countryside enjoyment'*, albeit we feel the reading of *'countryside enjoyment'* should be clear.

NP/EN 4. Item 3. Happy with a revision to the words *'Sandhurst boundary'* to read *'Sandhurst Neighbourhood Area'*.

Comment of potential overlap with the LP: - The NP policy contains specific details related to Sandhurst. Whilst the LP may refer generally to footpaths/access it is not considered that there is any wholesale overlap with the NP

NP/EN 5. Happy to add the proposed BFC wording *'the following areas shown within the inset maps in section 12 are designated as Local Green Space'*.

Other Matters relating to the designation of LGS 6 and LGS 7 designations as Local Green Space.

The following commentary has been split into two sections; firstly, matters relating to BFC regulation 16 comments and secondly matters regarding the designation of LGS 7 that have interfaces with the desires and intentions of Finchampstead Parish Council.

NP/EN 5 (LGS 6 and LGS 7). Background relating to the NP's designation of areas LGS 6 and LGS 7 as Local Green Space and response to BFC's regulation 16 comments: -

- 1 LGS 6 and LGS 7 form a major element of the initial vision of the County Councils of Hampshire, Berkshire and Surrey to develop an area of natural green space following the completion of gravel extraction. The County Councils subsequently used the Blackwater Valley Countryside Partnership (BVCP) as a body to continue and coordinate the 'green vision' for the Valley. The BVCP incorporated and included many nearby Authorities and Organisations, **including BFC**. Indeed, we would reiterate that the importance of the related area (including LGS 6 and LGS 7) was acknowledged by BFC within their 2002 Local Plan as possessing **Landscape of Special Importance**.
- 2 The areas on LGS 6 and LGS 7 form one of the remaining elements of the Blackwater Valley that has a rural ambience: this being attributed to the rolling and elevated background hills on the northern elements of LGS 6 and LGS 7. The rolling and elevated background hills provide landscape 'field margins.' This enables visitors to the SANG element of Horseshoe Lake and the **Nature Reserve** of Grove Lake to have the feeling of being fully within the countryside (rather than having the appearance of an urban park). The field margins also provide significant assistance with both maintaining and encouraging wildlife (and particularly wildfowl) in forming their habitats within the Blackwater Valley.
- 3 The designation of LGS 6 and LGS 7 is intended to continue and progress the intentions of the original County Councils and the subsequent support and intentions of the BVCP (and its associated Authorities and Organisations, including BFC). These intentions received overwhelming support from Sandhurst residents (via questionnaire and public exhibition responses). Indeed, the only contrary comments received related to those who appeared to have a commercial and short-term gain interest in the land. The designation of LGS 6 and LGS 7 was coordinated with nearby Authorities, including Finchampstead Parish Council and the BVCP. The designation of LGS 6 and LGS 7 are very much linked to the interests and objectives of Finchampstead Parish Council in progressing an undeveloped and delightful green area within the Blackwater Valley Corridor.
- 4 Comments relating to BFC's regulation 16 response: - We do not accept that LGS 6 and LGS 7 do not comply with NPPF para 107. We are very disappointed that BFC appear to have taken little cognisance of the evidence provided within NP Appendix 4. NP Appendix 4 supports the importance of the areas within LGS 6 and LGS 7 as being reasonably close to the community they serve, are demonstrably special to the local community (including nearby Yateley, Finchampstead and Eversley) and are not extensive tracts of land.
- 5 It is noted that BFC have only referenced a 1 Km distance to LGS 7 from Sandhurst. BFC have not specified to which specific community they are referring. BFC also appear to have failed to have considered the nearness of the communities to Yateley and Finchampstead. These are closer to LGS 7 than

some areas to Sandhurst. LGS 6 and LGS 7 do, of course, also serve the communities of Yateley and Finchampstead.

- 6 On the basis that ‘community’ can be defined as ‘a group of people in the same common geographical area’ the Steering Group would note the following in respect of LGS 7. Related distances for communities to LGS 7 include: -

- a) From the northwestern settlement of Yateley to LGS 7: - 830 m
- b) From the Ambarrow Lane community housing group: - 200m.
- c) From the community houses within Lower Sandhurst Road: - 750m.
- d) From Maybrick Close community: 900m.
- e) From the Lychgate community 1.3Km.

Using the Natural England walking distance guidelines the permitted walking distance would be slightly under 2km (this is based on a pro-rata of the walking distances for related greenspace areas).

In respect of LGS 6 BFC are reminded that the northwestern area of the community of Yateley is only 660m distant.

BFC are reminded that where properties are located near to a designated Local Green Space, they have been specifically excluded from the Local Green Space designation.

- 7 In evaluating the nearness of communities to greenspaces BFC have also appeared to have taken little cognisance of the guidelines provided by Natural England (Green Infrastructure Standards for England- Summary, January 2023) in respect of walking distances to greenspace. NP Appendix 4 notes in detail how the nearby communities fall well within the nearness guidelines provided by Natural England. Although Natural England’s document does not specifically reference Local Green Space its definitions relating to walking distances to greenspace (for an appropriate size of greenspace) are considered relevant. This is set against the background that NPPF para 107 and related Government Guidance Notes are silent as regards any defined distances.
- 8 Notwithstanding the foregoing it should be noted that BFC’s arbitrary wording of ‘usually interpreted’ has no evidence as to where it emanated.
- 9 The evidence provided, both current and historic, by many Authorities (including BFC) demonstrate why the areas LGS 6 and LGS 7 is of particular importance to the communities and can in no way be described as just extensive tracts of land. The Steering Group would reiterate that BFC within their 2002 Local Plan described an area that included LGS 6 and LGS 7 as possessing **Landscape of Special Importance**.

- 10 BFC are additionally reminded of the further importance of LGS 6 as it is crossed by a public right of way known as the Three Castles Path. The path has particular historical significance as it was named after its usage by King John (1167-1216) when travelling between the Castles at Windsor and Odiham and on to Winchester Great Hall. It is important, for the continued public enjoyment that a walk on the path provides a rural ambience. This would not be the case if LGS 6 were to be developed.
- 11 BFC in 2015 reassessed the districts Landscape Character. The areas containing LGS 6 and LGS 7 were included within BFC's assessment as occurring within B1 Crowthorne/Sandhurst Heathland Mosaic and E1 Blackwater River Valley. These reassessed areas can be summarised as possessing valued features of the landscape of local character. Full related notes can be found within Bracknell Forest's Local Plan para 9.1 (Landscape Character) and the associated Policy BFLP 36.
- 12 We would always be prepared to discuss in more detail the splitting of elements of LGS 6 into say LGS 6 a) and LGS 6 b) if this provides a satisfactory solution. LGS 6 has certain key dividing lines; an example of this could be the clear dividing line of the Three Castles Path. We would, however, not be intending to reduce the overall areas contained within LGS 6 and LGS 7 as these areas provide a key field and elevated margin to the rural footpaths enjoyed by the communities.

LGS 6 and LGS 7's interface with nearby Finchampstead Parish Council.

- 1 We would also note that Regulation 16 responses provided by Finchampstead Parish Council stress the importance of an overall strategy to provide a desirable green space within the Blackwater Valley Corridor, including the key elements that are contained within and near to Horseshoe Lake and Grove Lake. These areas being very much linked to similar areas within the boundary of Finchampstead Parish Council.
- 2 We would additionally refer to the Steering Group's Regulation 16 response that record Wokingham Borough Council Local Green Space strategies **that include areas larger than LGS 6 and LGS 7**. It should be noted that Finchampstead Parish Council's area occurs within Wokingham Borough.
- 3 We would further remind the reader of this report of the broader benefits of the designation of Local Green Spaces LGS 6 and LGS 7; these relate to potential future additional equestrian usage (please refer to the Consultation Statement). These are linked to potential land usage that include elements of land within the boundary of Finchampstead Parish Council.
- 4 In addition to the foregoing the following information was considered by the Steering Group in designating LGS 7 as Local Green Space. LGS 7, as noted

previously, includes a Nature Reserve in and around Grove Lake. The overall nature reserve is located within the boundaries of both Sandhurst Town Council and Finchampstead Parish Council. Finchampstead PC now own the whole of the Nature Reserve, including the area within the Sandhurst boundary. Elements of the 'field margins to the Nature Reserve are, however, in private ownership. For details of the Nature Reserve that occurs within the Sandhurst Boundary refer to the area inside the red boundary shown on NP inset Map 10 (page 75).

- 5 The Steering Group and Finchampstead Parish Council held several workshops (also attended by the BVCP) to establish the best way forward for their communities and to continue with the Blackwater Valley Corridor objectives of the BVCP. These were to establish the whole of the Grove Lake Nature Reserve and key field margins as Local Green Space. The objectives were instigated by designating LGS 7 as Local Green Space.
- 6 Finchampstead's actions to instigate a Local Green Space designation for the remainder of the Nature Reserve are programmed to commence once Wokingham Borough Council's Emerging Local Plan is 'made'.
- 7 Once the Wokingham Local Plan has been formally issued Finchampstead Parish Council will update their Neighbourhood Plan to include the appropriate Grove Lake based Local Green Space designation.
- 8 As summarised within the foregoing commentary the long-term objectives of Sandhurst Town Council and Finchampstead Parish Council is to designate the whole of the Grove Lake Nature Reserve (and key field margins) as Local Green Space. If this came to fruition, when applying the Natural England walking distances/related green space area guidance notes, huge swathes of Sandhurst, Yateley, Finchampstead and Eversley would be considered to fall within the NPPF 107 a) definition of '*in reasonable close proximity*'.

Response to Examiner's EN 5 comments: -

- 1 Evidence regarding why STC consider LGS 6 and LGS 7 are local in character rather than extensive tracts of land are included within NP Appendix 4 (with particular emphasis on section 5) and as summarised above in respect of the response to BFC's regulation 16 comments. Previous designations by BVCP (Blackwater Valley Countryside Partnership) and BFC's 2002 Local Plan separate out matters of 'local character'. These matters are also summarised above. It should be reiterated that BFC also acknowledged the significance of areas containing **Special Landscape Importance** within their previous Local Plan (2002). None of these deliberations would have been made if the recorded area had not possessed matters of local character.

- 2 In 2015 BFC updated their Landscape Character Assessments within the Borough. This included the land occupied by LGS 6 and LGS 7 as being defined as of Landscape Character B1 Crowthorne/Sandhurst Heathland Mosaic and E1 the Blackwater River Valley. Information regarding these designations is included within BFLP 36. Para 9.122 of BFLP 36 notes: - *Particular regard must be had to the landscape's valued features and characteristics to the landscape strategy of the **local character** area -----*. These landscape character designations were continued and subsequently incorporated into the current BFLP.
- 3 The BVCP and all of its associated Authorities and Bodies would not have highlighted the importance of the area within the Blackwater Valley Corridor as of having significant landscape values if the area had just been arbitrary countryside.
- 4 The importance of the areas contained within LGS 6 and LGS 7 have also been highlighted by the BVCP within their report 'Blackwater Valley Countryside Strategy 2024-2029'. The report noted that the area including LGS 6 and LGS 7 is the first section of the Valley that is not hemmed in by urbanisation. The conclusion of this is that this part of the Valley has a unique feature that does not exist elsewhere within the Valley. Therefore, it is vital to ensure that the objectives of the original Valley Plan produced by Surrey, Hampshire and Berkshire Councils is progressed. All of these comments support the fact that LGS 6 and LGS 7 are very much local in character and cannot be confused with arbitrary countryside. Indeed, the BVCP comments highlighted the increased importance of area including LGS 6 and LGS 7 when compared to other parts of the Blackwater Valley Corridor.
- 5 To add to the 'local in character' consideration it should be reiterated that LGS 6 is crossed by the Public Right of Way known as the Three Castles Path (refer to item 10 in the initial responses to this section. Not every arbitrary tract of countryside has an historic public footpath crossing it.
- 6 It should also be noted that not every arbitrary tract of countryside acts as a valuable, elevated field margin to support the enjoyment and wildlife/ wildfowl habitat of those making use of the Horseshoe Lake SANG and the Grove Lake Nature Reserve. It is averred that any arbitrary tract of countryside would not contain key 'field margin' features.
- 7 In respect of the NPPF para 107 c) the comment '*is not an extensive tract of land*' is subjective and unquantified. All that can be added is that LGS 6 and LGS 7 are smaller than many Local Green Spaces designated elsewhere (including nearby Wokingham). If large sizes of Local Green Spaces are referenced within Wokingham the Steering Group see no reason why they (when satisfying 'local in character') should not be used in Sandhurst. A sample of the larger Wokingham Local Green Spaces was included within the Steering Group's reg 16 response.

- 8 We would also note that the ‘field margins’ to LGS 6 and LGS 7 play an important role in attracting wildlife and wildfowl to the Valley area; please refer to para 9.2 and 9.3 of NP/ Appendix 4 that record the importance of the area for wildlife and wildfowl. It should be noted that other areas of the Blackwater Valley Corridor that do not possess ‘field margins’ have a much-reduced wildlife and wildfowl habitat. The important fact to note is that the British Trust of Ornithology consider LGS 7 as the best, by far of all the sites within the Blackwater Valley Corridor for attracting wildfowl. Many of the other areas of the Valley not having the countryside ambience that areas LGS 6 and LGS 7 possess.
- 9 To summarise why it is considered that LGS 6 and LGS 7 possess matters that are in local character over and above arbitrary countryside.

Typical arbitrary countryside would not include the following: -

- a) Being selected by the County Councils of Hampshire, Surrey and Berkshire as being singled out as of extreme importance to be retained as greenspace for the benefit of future generations.
- b) Being coordinated by a body such as the BVCP to be singled out for retention as greenspace.
- c) Having decisions made by a body such as the BVCP that were supported by numerous nearby Authorities.
- d) Contained land that had been defined by a Local Authority as possessing land of ‘special landscape importance’.
- e) Included in a 2015 BFC landscape character update that noted that the area contained valued features and characteristics and to the landscape strategy for the local character area.
- f) Being included within the current Local Plan with the continuance of the local character area (2015) designations.
- g) Was singled out by a body such as the BVCP as being important to retain as greenspace as it was one of the remaining areas for countryside enjoyment within the Blackwater Valley Corridor that was not blighted by background urban sprawl.
- h) Had the benefit of providing an elevated field margin to a very popular SANG and Nature reserve located within the bottom of the Valley.
- i) Contained the best field margins within the Blackwater Valley Corridor that contributed to the extensive and varied wildfowl habitat.
- j) Included an historic public right of way that crossed the land; with the intent of the users of the path having unspoilt countryside views over rolling hills.
- k) Provided a delightful ‘green’ backdrop to the many thousands of visitors to the SANG and Nature reserve to enjoy. Without the benefits of the countryside ambience of the SANG and Nature Reserve there is a high probability that visitor numbers will reduce and transfer to the nearby TBH SPA. This would particularly apply to dog walkers.

Para 6.1.3. The car ownership statistics were obtained from the 2021 census. The census noted that the car and van ownership was much higher than the national average (at circa 1.7 vehicles per Sandhurst household). The average car ownership per dwellings in England being circa 1.2 cars per household. This would indicate that the total car and van ownership in Sandhurst to be circa 13,600 (1.7 x circa 8000). We are happy to add wording to NP Appendix 1 and the NP to clarify the data source. NP Appendix 1 currently notes that car and van ownership is at least 13,000. Resident questionnaire responses also indicated a high car and van ownership per dwelling, with particular emphasis on larger properties. This coincided with the 2021 census data.

Para 6.1.5.

- 1 Potential traffic congestion in Sandhurst (particularly Yorktown Road between Rackstraws and Central Sandhurst is exacerbated by a number of bottleneck situations. These include intersections, roundabouts and pedestrian crossings. Current traffic congestion problems within Yorktown Road were identified by residents (via questionnaire responses and public exhibitions) as being a concern. A simple definition of traffic congestion can be defined as *‘a condition on road networks that occurs when traffic demand exceeds the available road capacity*. Happy to add explanatory wording to para 6.1.5 should this be necessary.
- 2 We would also add that both the NP and NP Appendix 1 note the high proportion of residents who rely on cars for routine travel, alongside the low use of buses and rail. Statistics on rail and bus usage are included in NP Appendix 1. The Steering Group would also note that since the NP (regulation 14) version was produced the twice weekly bus route (598) from Crowthorne Station to Camberly (via Little Sandhurst and the Meadows) has been curtailed due to it having very little usage and it being financially unviable (Council figures indicate every short journey was costing circa £16 per user). This further adds to the evidence regarding the low usage of buses within Sandhurst and emphasises and substantiates that Sandhurst Residents make extensive use of cars.
- 3 Are a little unclear of the reasoning behind BFC’s comments regarding *‘unclear how conclusions relating to nearby developments add to traffic currently using Yorktown Road’*. It is reasonably apparent that future developments such as Derby Field will have an impact on the Sandhurst traffic (particularly Yorktown Road). To infer that these developments may not have an impact on Sandhurst traffic is considered erroneous.
- 4 It is not the NP’s function to carryout traffic assessments of unknown and unquantified developments. This to be assessed by the developer at the time via

a transport assessment. Indeed, this procedure appears to be standard practice within BFC for previous developments. It would particularly apply to developments that are in addition to large and medium developments included within the Local Plan.

- 5 The traffic flows in Sandhurst have not been measured or modelled; they are based on traffic flow information that BFC forwarded to the Steering Group. This has been referenced within NP Appendix 1 para 2.6.5. Cognisance has also been taken from information contained within the 2011 and the 2021 censuses. The Steering Group would also highlight the Government's Road Traffic Statistics 1993 to 2025; these relate to vehicle miles travelled on Bracknell (southeast) roads. If one ignores the 2020 to 2021 Covid period, the government figures indicate circa (all motor vehicles) 5-7% increase since 2011. The Steering Group understand that the figures that were provided were similar if not the same as figures provided to consultant WSP who are responsible for the compilation and drafting of the Bracknell Multi-Model Transport Model. The Steering Group are therefore surprised at BFC's comments that infer that the NP should include separate and individual measurements or modelling.

Para 6.1.6.

- 1 We do not accept that para 6.1.6 is not consistent with BFLP 25. There is nothing within para 6.1.6 that contravenes BFLP 25. We would, however, be happy to add confirmation that BFLP 25 does of course still apply. We also do not accept that para 6.1.6 is contrary to national guidance relating to Travel Assessments and Statements. All of the parameters noted within BFLP 25 will, of course still apply. Indeed, nothing within the NP is considered not to be in conformity with NPPF 30. Para 6.1.6 only relates to what needs to be taken into account when assessing a planning application's road usage via a Transport Assessment or Traffic Statement. All other parameters relating to the implementation of all of the Climate Change matters noted within BFLP 27 and NPPF para 30 would, of course, still apply. We would note that nothing within the NP promotes less development than set out in the strategic policies of the area or undermine those strategic policies.
- 2 NP para 6.1.6 supports the intentions of BFLP 25 in that it provides information as to how item 1 of that policy can be supported to prevent, minimise and mitigate negative impacts on the transport network and road safety. Key to establishing what mitigation measures may be instigated it is important to establish the potential increase on the road network that a development would produce in the first place.
- 3 This guidance note was included solely to ensure that Transport Assessments (and if appropriate a Transport Statement) considered not only existing traffic levels and traffic generated by the proposed development, but also the

cumulative impact of all nearby Local Plan designated sites that had yet to be built/occupied.

- 5 What para 6.1.6 is intended to do is to define in more detail what should be included as regards traffic levels to comply with BFLP Policy LP 60 item1 (*'Development proposals will include a full assessment of'*).

NP/ T 1. We do not consider that anything within NP/T 1 implies that other modes of travel have not been considered. NP/T 1 relates to how Transport Assessments or Statements should consider traffic volumes. This would follow any development application that includes travel plans and any mitigation or part mitigation relating to climate change procedure under BFLP 27. Again, we make the comment that we consider nothing within the NP reduces the intensions of NPPF 30.

Comment on potential overlap with the LP: - Although elements of NP/T 1 do occur within the LP the intention of the NP was to highlight the traffic concerns within Yorktown Road. The guidance notes to the NP policy detail what procedures should be included for a Transport Assessment or Transport Statement to be produced. These procedures are specific to the NP. It is considered that the inclusion of the NP policy helps the reader to understand the implementation of the specific Transport/traffic related matters.

The NP policy does, however, refer to BFLP 60. As a minor point NP para 6.1.8 should read BFLP Policy LP 60 and not BFLP LP 60.

NP/T 2. We do not understand what BFC allege is unclear as regards medium and large developments. Definitions regarding large and medium sites are included within other BFLP documentation. If it helps, we would be happy to add an explanatory note regarding the BFC definitions: -

Medium Sites: - Under 1 ha, with 5 or more dwellings

Large Sites: - 1 ha and over.

The above are references included within various BFC publications relating to 'Planning Commitments for Housing'. This could be added to the NP references.

Comment on potential overlap with the LP: - Although there are some partial overlaps with the LP the main intention of the NP is to highlight TBH SPA access restrictions. These could apply when a medium or large site needs to consider the inclusion of new footpath and cycle routes to link up with similar infrastructure. The NP also highlights the need for appropriate linking footpaths and cycleways to be included within medium and large site applications.

Para 6.2.1. We do not accept BFC comments. Our data is reinforced by the questionnaire responses. Clearly data is also substantiated by the facts contained within the 2021 census. The census indicating that car and van ownership is at least 1.7 vehicles per dwelling. When retirement homes and nursing homes are taken into account the average dwelling in Sandhurst has approaching two cars/vans. Bearing in mind that there are many flats in Sandhurst that may possess only one car per unit there is overwhelming evidence that the average medium and or large dwelling has 3 or more cars. The Steering Group would also highlight that many narrow roads in residential areas do not possess any specific visitor spaces.

Para 6.2.7 and 6.2.8. We do not accept that the NP does not comply with NPPF 112. In assessing the requirements of car parking for larger dwellings of up to 4 units the NP has taken full cognisance of: -

The accessibility of the development

The type, mix and use of the development

The availability and opportunities for public transport

Local car ownership

The need to ensure an adequate provision of spaces for charging plug in and other ultra-low emission vehicles.

The NP, within many sections, includes details regarding limits relating to bus and rail usage. It also includes information that, apart from the Meadows Superstore, carparking provision to other retail centres falls short of the recommendations of the BFC parking standards documents. The NP also describes in some detail many areas of 1950s to 1990s housing within Sandhurst that do not provide sufficient off road car parking provision. There are therefore many areas within Sandhurst where on street parking causes problems with general vehicular access. This is amplified by many roads being rather narrow. The intention of the NP is to attempt to ameliorate the problem.

Para 6.2.7 and 6.2.8. We would note that all of the parameters within NPPF 112 were considered when compiling policies relating to parking provision. We would remind BFC of the data and information contained within both the NP and NP Appendix 1 that provide evidence regarding, accessibility of the development; this included matters such as existing narrow roads of older design with very limited ability to provide safe on street parking. The type and mix and use of development have been defined as 'new dwelling developments of up to four in number and larger new developments if BFC's recommended visitor parking provision cannot be provided'. The availabilities of and opportunities for public transport have been considered in detail and are recorded elsewhere within the NP. The NP and NP Appendix 1 cover in detail the limitations of public transport and the restrictions in opportunities for public transport. These include narrow roads that limit safe regular bus services, limits relating to Sandhurst Halt Station, low bridges etc... The NP and Appendix 1 have provided comprehensive statistics regarding local car ownership and how high these are compared to the

national average. Car charging matters are covered elsewhere within the NP. **We therefore do not accept BFC's assertion that related policies have not had regard to national policy.**

Para 6.2.11. We consider that the NP's policies regarding parking provision (particularly where parameters specific to Sandhurst have been considered) are clear and unambiguous and comply with NPPF 16 d). However, if BFC can provide any positive enhancement wording to add any clarity to the intention of the NP policies these would be welcome.

NP/T 3. For the reasons noted above we do not accept BFC's comments that Sandhurst is better suited for parking provision than elsewhere in Bracknell. Rail and bus provision in Sandhurst is significantly less attractive than most of the remainder of Bracknell. Many Sandhurst streets date back before the advent of multi car usage. Indeed, some of the roads in Sandhurst, particularly Little Sandhurst, date back to Victorian times. Many residential areas in Sandhurst do not have provision for visitor parking and as a consequence visitors exacerbate on street parking problems, often parking partially on footpaths.

We would also note the comments made within the Regulation 14 documentation that Sandhurst Halt Station has its limitations as regards attracting users, it has no formal drop off areas, it does not possess a car park, it is unattended, it is not disabled friendly and it has limited access regarding bus services. It does not possess easy links to rail routes to London. All of these parameters do not encourage reduced car and van ownership.

Notwithstanding the above we note that since the NP was drafted BFC have updated their Parking Standards recommendations (late June 2026). The NP can be updated to accord with the late June 2026 update. However, it would appear that nothing within the parking standards update would change the intentions of the NP.

NP/T 3. The term flats and dwellings reflect the descriptions used within the 2016 version of BFC's parking standards document. The intention of NP/ T 3 is to include slightly more car parking spaces for larger houses than flats with similar bedroom numbers. We do not consider that gross and net dwelling comments are relevant to NP/ T 3. Net dwelling comments are generally used to record the number of new dwellings minus any dwellings lost. NP/ T 3 relates to new dwellings (and flats if relevant) up to and including 4 in number. We are unclear of any reasonable objection that BFC have to the NP wording. We are unclear as regards which element of NP/ T 3 that BFC considered is ambiguous. Perhaps BFC could expand on this such that matters can be considered further and/or provide positive wording to enhance the intentions of the NP.

NP/ T 3. Matters relating to parking restrictions associated within zones of the TBH SPA are covered elsewhere within the NP (together with reference to BFLP 32 which describes full policy matters associated with the TBH SPA). However, we would be happy to duplicate the restrictions relating to the TBH SPA within an explanatory note to accompany NP/T 3.

We would remind BFC that their current parking standards parking requirements apply to all new medium and large sites providing an appropriate number of visitor parking places can be provided.

Response to Examiners T 3 comments: - Please refer to the comments above.

Para 6.2.14 (F and G). Noted.

NP/ T 4. We would remind BFC that the policy says improved pedestrian access **to** the Station. The policy does not include pedestrian access within the Station. We consider the wording to be clear. However, if BFC have any more defined definitions in mind these would be welcome.

Response to Examiner's T 4 comments: - The intention of the Policy is improving pedestrian access to the Railway Station. This related to areas outside of the Station itself. The second element of the Policy is an aspiration. On reflection the second element may be better suited within the explanatory paras. However, the improving of bus services may feature as a planning condition if any large housing developments were introduced nearby. As we understand it, this could include developers making contributions to a service.

NP/ C 1. There are many parameters that could be used to demonstrate need; indeed, these may be too complex to cover each and every circumstance that may arise within a future planning application. One would hope that a planning officer can use some reasonable judgement when reviewing the requirement to '*where a need has been demonstrated*'. Would welcome any BFC wording to expand their thoughts such that these could be included within the policy (providing such wording does not detract from the intentions of the policy).

NP/ C 1. Happy to update the policy wording to read '*would need to*'.

NP/C 1. Item 5 and 6. We consider that the policy is clear and unambiguous. That is if a planning application is made whereby the car parking provision to key retail and commercial areas reduces the current parking provision, then an equivalent number of any spaces lost must be provided nearby. This policy has been drafted such that car parking spaces to key retail areas are not reduced. As noted elsewhere most parking provision to Sandhurst's retail/commercial areas fall short of the requirement of the Bracknell parking standards document. Resident's questionnaire responses and public exhibitions highlighted general retail and commercial parking problems. Indeed, the customer footfall provided to the central Sandhurst retail area is considered to be dependent on parking provision. If the current parking provision were to be lost it would have a negative impact on the retail trade.

NP/C 1. We consider BFC's comments to be incorrect in respect of the TBH SPA. We would refer BFC to Policy NP/ C 1 which clearly includes comments relating to the 400m protection zone of the TBH SPA. It is considered that the policy fully complies with the EU requirements. We consider BFC's comments to be in error.

Para 7.7.9. Maps relating to the Broadway and Cambridge Road car parks are currently included within section 12 of the NP. Their location is clearly described within para 7.7.9. We are unclear why BFC wish these maps to be included within section 7 of the NP. We included related maps within section 12 in accordance with previous BFC requirements. BFC clarification on matters would be welcome.

Response to Examiner's C 1 comments: - Please refer to the comments above,

NP/ C2. Comments noted. We would, however, be happy to delete 1) a) to c) from policy own NP/C 2.

Response to Examiner's C 2 comments: - Services are defined within the first section of BFLP 14 (14.1 page 236). Happy to add reference to this if it helps. The intention of the Policy is to retain existing Public Houses for the architectural and social benefit. Both are seen as important for Sandhurst. Social Clubs are primarily important for their social benefits. The importance of the architectural benefit to Sandhurst is set against comments made elsewhere regarding the general mediocre townscape.

Para 7.8.4. If 1 a) to c) is deleted the valid comment that BFC have made, para 7.8.4 could remain unchanged.

NP/ C3. Comments relating to semi- rural in relation to St Michael's and All Angels Church have been outlined within the foregoing. However, to move matters on we would be happy to remove 'semi' from Policy NP/C 3, to read *rural street scene*).

We would be happy to move the items 2, 3, 4, and 5 of policy NP/C 3 to an explanatory para and noted as aspirations. These. However, have been included for consideration as a planning condition for a related and suitably sized development.

Response to Examiner's C 3 comments: Matters associated with St Michaels and All Angels Church are definitive, whereas items 2 to 5 are of general objectives. Both are linked to matters that could be included within planning conditions that could relate to appropriately sized developments.

NP/C 4 If a future potential development were to be submitted for a site on an unadopted road it would be subject to all related BFC and hopefully NP policies, these

may include satisfying all parking and environmental matters. However, in principle, the Steering Group would be happy to remove the formal policy regarding upgrading of poorly surfaces roads and replace it with some beneficial and related explanatory text.

It is therefore proposed that para 8.4/8.4.2 remain as it is an objective. However, the Objectives and Policy NP/C 4 can be deleted. Para 8.4.2 to also be deleted. Index etc would need to be adjusted accordingly.

We would welcome any BFC positive comments such that the intent noted above can be included within the NP.

Response to Examiner's C 4 comments: - Please note the comments above.

Para 9.2.2. We note BFC's comment; however, the point we are endeavouring to make is that this particular area of Central Sandhurst has very poor architectural quality. It would therefore benefit the community if it could be improved.

NP/ ERB 1. Background information relating to the drafting of NP/ERB 1: -

- 1 Detailed questionnaire responses from residents (over 600 responses received) indicated that there was an overwhelming comment that no more Hot Food Takeaways were required within Sandhurst as there were far too many at present. There were also overwhelming views expressed regarding car parking /general car parking concerns in respect of too few spaces being provided in retail centres (apart from the Meadows Superstore). Concern was also raised regarding too much on street parking with many vehicles partially parked on pedestrian footpaths. A separate analysis of parking provision to the retail centres in Sandhurst (apart from the Meadows) indicated that spaces fell short of that required by the BFC Parking Standards Supplementary Document (both the 2016 edition and recently issued update). Therefore, part of policy NP/ERB 1 was drafted to ensure that any new Hot Food Takeaway outlets would not exacerbate parking problems.
- 2 Turning to BFC's comments we would note: - We consider the intent of item 2 of policy NP/ERB 1 to be clear. As the items covered within item 2 could be very complex it would be near impossible to provide some general words to cover every potential future eventuality. We would have assumed that when and if a planning application was submitted that BFC could use some reasonable subjective thinking in making related planning decisions. As an aside we believe that similar wording included within item 2 has been used within NPs elsewhere. We would, however welcome any positive comments from BFC whereby the intent of item 2 can be included within the NP.

- 3 We would be happy to remove criterion 1 from Policy NP/ ERB 1.
- 4 We would be happy to include an explanatory note to the policy to make comment regarding 'walking distance from schools (albeit precise definition of this is unclear). As an aside we had previously checked the distances from the main retail centres to Sandhurst schools and found that schools were remote from the centres.
- 5 In respect of how a planner can make a decision in regarding the parameters to demonstrate reasonable attempts-----, it is assumed that reasonable subjective observation would apply. However, if BFC have any positive comments to make in order to expand and define this we would welcome any comments.
- 6 It should be noted that within BFC's 2016 parking standards document, under section 2, A5 there was a specific section that related to (Hot Food Takeaways); the standards here being more onerous than categories A 2 to A 4. As notified by BFC there is now a new parking standard document (issued late June 2026) that superseded the 2016 version. Hot Food Takeaways, in the June 2026 edition now has a specific section (page 26). Notwithstanding the update of the BFC parking standards the related wording of NP/ERB 1 is still relevant as the parking related guidance notes (para 9.3.7) relate to '*All parking assessments to be based on the current BFC Parking Supplementary Document*'.
- 7 We note that BFC have referenced BFLP 21 and say that it is considered not consistent with this policy. We are unclear what BFC's concerns are as BFLP 21 relates to hierarchy and extent of centre. We would, however, remind BFC of the overwhelming resident's comments that note they do not want further Hot Food Takeaways. The NP, however, does not specifically refuse Hot Food Takeaway applications.
- 8 We can confirm, for clarity, that NP/ ERB 1 applies generally to the settlement of Sandhurst.
- 9 We can add an explanatory note to policy NP/ ERB 1 to accord with the BFC comments relating to the TBH SPA.

Para 9.3.8. We would be happy for the removal of this para as the parking requirements for Fast Food Takeaways are covered elsewhere within the NP.

Response to Examiner's ERB 1 comments: - We would be happy to remove item 1 from Policy NP/ERB 1. The original item 1 is considered self-explanatory. For matters associated with items 2 and 5 please refer to the comments above.

NP/ECC 1. We would suggest that the wording regarding the orientation of roofing remains, as this provides potential maximum areas for solar panels to be installed. We can, however, include reference to NPPF paras 161 and 162 within an explanatory note to cover compliance with cooling requirements.

Comment on potential overlap with the LP: - The NP policy is very much linked to the LP (as noted within para 10.1.3).

Map 7. We would be happy with the adding of an explanatory legend noted regarding the boundaries. Happy to improve the title on the map to read Sandhurst Settlement defined boundary.

Map 8. We would note that the source of the map should be clear as the accompanying noted records that it is part of the Government Flood Plain information (as of Jan 2024).

Map 10 and 11. We will add an explanatory note to record that the red line represents the related boundary.

Map 12 and 13. Ditto comments above.

Map 14. Since map 14 was produced BFC have included a clearer and similar map within their SEA response. Would be happy to substitute the original map 14 with the updated version. We are happy to substitute the current wording with the BFC proposed explanatory wording (as both have a similar intent).

Map 17. This map was included to accord with previous BFC recommendations. It should be noted that Ambarrow Hill/ Court is referenced within the NP. We are unclear why BFC are proposing to remove it.

Maps showing the designated Local Green Space designations. We are happy with the adding of an exploratory legend note to say that the red line represents the boundaries of the respective Local Green Spaces.

NP/ECC 2 matters: - BFC appear not to have commented on NP/ECC 2. We, however, note that the Examiner has asked for comments on a **potential overlap with the LP**. The Steering Group would note that the intent of the drafting of the policy was: -

- 1 To encourage the use of ground source heat pumps as these are more efficient than air source heat pumps and have the potential of not creating potential noise disturbance. Ground source heat pumps for individual properties are far more expensive than air source heat pumps and are therefore, in normal circumstances, unlikely to be instigated.
- 2 The introduction of the policy was drafted in an effort to encourage communal boreholes (or trenches), whereby the cost per dwelling could be substantially reduced. This could be of particular importance if the NP's intention of encouraging 'starter homes' came to fruition. The NP does, however, provide for the installation of air source heat pumps where appropriate.

- 3 The BFLP was read in conjunction with some BFC technical papers regarding matters associated with air source heat pumps. At the time of drafting, the LP was considered a little 'light' in proposals associated with acoustic guidance relating to multi and/or close together properties. Concentration of noise parameters tended to be related to individual heat pumps
- 4 As the intension of the NP was to encourage 'starter homes' policy consideration was made to provide for external noise reduction/ noise limits if the scheme included air source heat pumps.
- 5 Although associated technical papers have recently been updated by BFC they appear not to have been referenced within the LP. It is therefore considered that the NP policy does not overlap with the LP as it enhances things.
- 6 It should also be noted that during the drafting of the NP, British Standards relating to heat pumps were also updated. To ensure that all updated technical considerations were applicable the policy included the wording relating to 'acceptable to BFC's Environmental Health Officer'. This concurred with previous BFC comments on the Policy,
- 7 We therefore consider that the NP enhances the LP. The NP also notes that ECC 2 supports BFLP policy 56 (albeit LP 56 is very general in comment) and does not overlap the NP.
- 8 As a general point we would note that the LP appears to be rather light on (or guidance notes) relating to the installation of heat pumps (particularly Air source heat pumps) when it comes to acoustic matters.

Additional Comment: - Having reviewed the wording of NP/ECC 2 it may be that an additional explanatory para should be introduced into the NP to cover multi and close together air source heat pumps: -

'Where multi air source heat pumps are to be installed, whether this applies to a single dwelling or a combination of units on nearby dwellings, reasonable noise levels should be evidenced to ensure that all sensitive boundaries and neighbouring windows are not subject to excessive noise'.

We would also like to add reference to BFLP 58 (pollution and hazards) to para 10.2.6 It to read -----BFLP Policies LP 56 and LP 58.

Para references. We are happy for adjustments to be made to para references to be consistent (roman and normal, as appropriate).

Appendix 1. We do not agree that Appendix 1 should be removed from the NP documentation as it is continually referenced within the NP. We would remind BFC that it was their initial proposal that we include data within a separate document. This to make the NP easier to read.

It is fully appreciated that some of the data may be out of date. We, therefore, within NP Appendix 1, noted the date to accord with when the data was measured and its source. All data, following its release, will become out of date, this does not mean that no data should be referenced. We would note that many other NPs that we have seen do include similar data to the data we have included.

Appendix 2 and 3. The questionnaire responses were included to enable those contributing to the consultation stages of the NP to understand the thinking into the composition of the NP. We feel it is relevant and useful background information to a potential reader of a 'made' NP.

Appendix 4. Appendix 4 has been included to form evidence relating to Local Green Space designations. It was produced for the aid of those consulted and the Examiner. It additionally provided a reader of a 'made' NP with background information in respect of how and why Local Green Spaces were designated. We feel that it would provide useful background information to a reader of a 'made' NP.

Appendix 5. Again, this document was included for the aid of those being consulted during the production of the NP. We feel it would also be useful to the reader of a 'made' NP rather than the reader attempting to find a document that may or may not be included on BFC's website. We would also note that by separating the pages relating to Sandhurst from the bulk of a BFC document that covers many areas within Bracknell it is much easier for a reader to access and understand.

Appendix 6. The appendix noted that the acronyms apply to all NP and associated documents and not just the NP. It has been produced for the aid of those reading the NP and associated documents to which the NP may refer. Can add acronyms such as NHS as BFC propose. Can ensure that all references to heat pumps are included. Please also note that comments have been made that some of the descriptions, for ease of reading, are simplified versions of formal definitions. Clearly for any finite definition requirement a formal definition would override the simplified version. Can add this explanatory note to Appendix 6 to cover this.

We have included all relevant acronyms for ease of reference. We see no logical reason to remove the occasional acronym that has also been referenced within the NP. Where an acronym has particular relevance to the NP wording it has been duplicated in order to make the NP easier to read.

Appendix 7. This was primarily included for the benefit of those making consultation comments. We see no logical reason why it should not be included and referenced within a 'made' version of the NP. If BFC feel that any clarification as regards when the SEA was produced and what documents it related to, we would welcome any positive

comments. We, would, however, note that we are not aware of any matters in the final drafting of the NP that changed the fundamentals of the NP draft that was used for the SEA exercise.

Appendices 8 and 9. It appears to be standard NP procedure elsewhere that Consultation and Basic Conditions Statements are available for all to read in conjunction with a 'made' version of the NP.

In addition to the comments made above it may be worth making comparison comments with the nearby Yateley Town Council's NP. This included information and history of Yateley, statics regarding demographics, community engagement (including surveys), historical house data, and a link to the SEA report.

The Sandhurst NP seeks to continue with the intentions of providing the NP reader with all related information (including feedback from consultations) and data, all in the same way as other NPs (including Yateley). We would also note that in keeping all associated information together it will make the task of drafting an NP update that much easier.

Steering Group comments relating to BFC's supporting document referenced Appendix 2.

General NP comments: -

- 1 Be happy to instigate a final check to ensure that BFLP is used throughout the NP.
- 2 Be happy to do a final check to ensure Policy numbering is consistent.
- 3 In respect of introductory paragraphs we would note that if Policies are included within a specific section of the NP, then one explanatory para could be appropriate for a number of Policies. Policies have generally been drafted to include associated matters. If there are any specific Policies where BFC consider additional introductory paras would be of help, related comments would be welcome.
- 4 Can do a final check to ensure that explanatory notes are 'user friendly'.
- 5 Can make arrangements for formal editorial checks to be instigated prior to the issuing of the final NP. This may be beneficial to be instigated following the incorporation of all appropriate comments received during the Examination process.
- 6 Can check for any typing errors relating to the TBH SPA.
- 7 Can ensure that Shepherd Meadows is included.
- 8 Can adjust secondary paras and policy references to be consistent.

Background page 8. Can incorporate the BFC wording as appropriate.

Section 3. Can adjust the title to read 'Housing'.

Para 3.1.2. Can add the BFC clarification regarding BFLP and SALP site allocations.

Para 3.1.4. Can change the wording of 'developments' to 'allocations'.

Paras 4.2 and 4.3. Can check to see and confirm continuity of the correct wording.

NP/ D 2. Can add the BFC wording clarification.

Section 5. We would prefer to leave the wording as is. We feel the BVCP wording is required to be incorporated into the NP for the reader to understand the background and reasoning behind the compilation of the related Local Green Space designations.

We may have duplicated some wording within NP Appendix 4 but these were included to make the document more user friendly rather than referring back to separate papers.

Para 5.1.3. Can adjust the wording to ensure the correct element of Ambarrow Hill is identified as the nature reserve.

Map 4. Can use similar wording to that used but can incorporate it within an explanatory para.

Map 5. Can add wording to improve clarity.

Para 5.4.11 Can correct the typo.

NP EN4. The para is not intended to confuse public rights of way. We can, however, add wording to cover both PRow and permissive routes over private land. The intention of the policy (item 3) is to encourage a continuous walking route near or adjacent to the northern bank of the River Blackwater for the whole of the southern boundary of the Town. This could well be a combination of footpaths that are PRow and permissive routes over private land.

Para 5.5.2. Can remove this para, providing NP Appendix 4 is included as an NP document.

Para 6.1.4. Can expand on this para and provide further information. However, the travel conclusion is very clear in that overwhelming use of car usage is appropriate. Indeed, this was also supported by extensive liaison with residents.

Para 6.4.1. The BFC comments are incorrect. The 'White' bus route information and related maps are included within NP Appendix 1 (page 45).

Para 6.4.5. Can add 'and funding'.

Para 6.4. The comments relating to many narrow roads in Sandhurst are just summarising what exists. If BFC have any positive thoughts on how to ameliorate the problem these would be welcome.

Para 6.4.11. Can add an explanatory sentence relating to road widths for potential bus routes. The point we are attempting to make is that many roads within Sandhurst are too narrow to accommodate safe regular bus services.

Section 7.5.1. We would prefer to leave para 7.5.1 as is. The intention being to summarise facilities used by the community.

Objection box page 56. The comments relating to general parking to commercial and other centres. The Steering Group have assessed many of the commercial centres and have noted that many of these (the Meadows Superstore apart) have parking provision short of the recommendations of the BFC parking standards. Central Sandhurst and College Town retail centres fall woefully short of sufficient parking spaces. Would welcome any BFC positive comments to improve the objectives box wording, providing the intent is not lost.

Objective box page 57. Can make the numbering consistent.

Page 58. Community Infrastructure. Unclear what BFC are inferring as Community Infrastructure has its own numbering (8). Please note that the Contents (page 8 of the NP) specifically details its content under section 8.

Para 8.3.4. This para records comments received from residents. These were general and did not contain maps. Therefore, do not consider a map to be relevant.

Para 8.4.1. Can remove the words 'drainage system' (following SUDs).

Para 9.2.1. Can change to read 'Residents were satisfied with the range of shops provided in Sandhurst, with particular emphasis on the hypermarkets located at the Meadows'.

Para 9.3.1. The BFC comment regarding there being reference to two different Employment Areas is incorrect. The wording noted that there are two elements of the area. These are divided by a railway line and have two completely differing architectural elements. Happy to add the words 'albeit all part of the Employment Area' before the current wording '*it contains two salient elements*'. We would note that the accompanying map shows the single area.

Para 10.1. Can correct the typo to read BFLP 56.

Section 11. The BFC Tree Strategy to which the NP referenced was approved in 2017. Its title is Bracknell Forest Borough, Tree Strategy. Not sure what further description BFC require.

Locally listed buildings. A Locally Listed Building map is included within the NP documents. Refer to MP Appendix 1 para 2.3.2, page 34.

Appendix 1. Para 2.2.4. Can update to include 'Hill' as well.

Appendix 1, Para 2.2.5. / 2.2.7 This is an index and we consider is OK. Can correct the typo relating to the TBH SPA. Ditto para 2.2.7.

Whilst it is appreciated that BFC would likely include the final Examiners comments (where they agree), we would be happy to update the NP to include the corrections to typos, legends, maps, numbering, etc and all matters that appear in agreement with the BFC comments, should this help. This would not include any matters that are in perceived disagreement.