

Sandhurst Neighbourhood Plan

Steering Group comments (made on behalf of Sandhurst Town Council) in response to Turley's (on behalf of Bloor Homes) Regulation 16 comments. Bloor Homes being a landowner of an element of land that is included within Local Green Space designation LGS 6.

- 1 The following comments are made in respect of the related headings noted by Turley: -**
 - 1.1 Town Council position representation as commercial or speculative.** The Steering Group does not place any perceived reliance on the commercial or speculative interest in the site. The Steering Group's primary objective is to instigate a Local Green Space designation (LGS 6). The designation of LGS 6 (and other Local green Spaces) is supported by the evidence and background information included within NP Appendix 4. **The evidence provided within NP Appendix 4 runs through all the required parameters to comply with NPPF para 107.**
 - 1.2 Town Council position on previous Appeal Decision.** STC do not place sole weight on the previous Appeal decision of October 2023, albeit matters within the Appeal Documentation do provide related evidence. It is however noted that Turley did not include reference to the Appeal within their Regulation 14 response. Again, STC would comment that the weight of evidence to designate LGS 6 as Local Green Space is included within NP Appendix 4. However, the Appeal papers are of benefit to reference when reviewing landscape quality matters.
 - 1.2.1** The Inspector's Appeal Decision summary included matters relating to the quality and content of the EDP landscape report compared to similar subject matters provided by BFC's Landscape Consultant. This comment was made in regard to the observation that the Appeal Inspector appeared to place more weight on Bracknell's Landscape Consultant's report than that of the report produced by EDP, when making a dismissal decision.
 - 1.2.2** The Steering Group would remind Turley of previous comments that the EDP report included within the Regulation 14 consultation, and indeed largely duplicated within their Regulation 16 comments, was a 'cut and paste' of the report they provided during the Appeal. BFC's Landscape Consultant used almost identical landscape scoring parameters as that provided by EDP. The fundamental difference was that BFC's landscape consultant scored the landscape features of the Bloor site higher than that of EDP.
 - 1.2.3** BFC's Landscape Consultant's document can be referenced within the supporting papers presented at the Appeal. The Appeal reference is recorded in NP Appendix 4 para 6.3.2. We would remind Turley that their original Appeal was dismissed, primarily because of potential harm to the countryside. For the

Appeal Inspectors conclusions, it is clear that more weight was given to the landscape evidence and landscape assessment scoring provided by BFC's Landscape Consultant than that of EDP.

1.3 Town Council position: reliance on the wider Blackwater Valley Corridor.

Although LGS 6 does occur within the Blackwater Valley Corridor its particular significance has been highlighted by the Blackwater Valley Countryside Partnership (BVCP) as being one of the most important areas of land within the Valley to retain as green space. This is one of the reasons why it has been designated as Local Green Space, particularly as it provides an elevated field margin to the area of the Valley open to the public. Numerous and referenced BVCP documents support this view. It should be noted that BFC were part of the Authorities who contributed to draft BVCP's intentions regarding the Valley. Indeed, BFC, within their 2002 Local Plan, designated the area that included LGS 6 as possessing **Landscape of Special Importance**.

1.4 The STC did consider all areas on a site-by-site basis. Reference to the NP Local Green Space designations show that not all areas within the Blackwater Valley Corridor have been designated. The only designations that were made relate to the key area of 'green' importance within the Valley that had been specifically identified as possessing compliance with NPPF para 107. The BVCP comments and related reference documents have been included within section 5 of the NP and NP Appendix 4.

2 Town Council position: absence of site-specific reference against NPPF paragraph 107. The Steering Group consider that the Turley comments are in error. Precise details applicable to NPPF 107 and each of its subsections is comprehensively provided, together with related evidence within NP Appendix 4.

3 Town Council position: scale and extent of the Local Green Space designation. STC remind Turley that the Consultation Statement should be read alongside NP Appendix 4. Together, these provide substantial evidence that the scale and extent of the proposed Local Green Spaces fully comply with the requirements of NPPF paragraph 107. It should also be noted that the scale and extent of the Local Green Space within the Valley are fully supported by Natural England's publication 'Green Infrastructure Standards for England – Summary (January 2023, version 1.1)'.

4 From a general viewpoint the Steering Group consider that Turley's comments regarding alleged Local Green Space noncompliance with NPPF para 107 to be inappropriate. It may well be that Turley in drafting their comments may not have read the significant evidence regarding NPPF 107 compliance that was included within NP Appendix 4. Indeed, within Turley's response the Steering Group note that little or anything in the comments that Turley have made would indicate that they have taken cognisance of NP Appendix 4.

- 4.1 The Steering Group would also remind Turley that the designation of LGS 6 followed workshops with the BVCP, Yateley Town Council, Finchampstead Parish Council and Eversley Parish Council. All were in agreement that it was vital for the enjoyment of their communities that the key areas (including LGS 6 and LGS 7) be retained as green space. Indeed, the inclusion of LGS 6 and LGS 7 is also fundamental to the overall desires of Finchampstead Parish Council's vision of the Valley. We would refer here to Finchampstead's Regulation 16 consultation comments. It should also be noted that an overwhelming majority of Sandhurst resident comments (received via comprehensive questionnaire responses and public exhibitions) agreed with the concept of retaining the countryside in and near to Horseshoe Lake and Grove Lake as green space.
- 4.2 Another important point that Turley appear to have not referenced relates to the future vision that Sandhurst TC and Finchampstead PC have of the Blackwater Valley Corridor. This is assisted by LGS 6 and LGS 7 being designated Local Green Space. Please refer to NP Appendix 4 section 7.9. This relates to the potential of the area being one of the prime equestrian centres in the south of England.
- 5 Supporting Housing Delivery.** The NP fully complies with the Bracknell Forest Local Plan (BFLP) in respect of housing allocation. The Steering Group would make the comment that Turley appear not to have acknowledged or taken cognisance of the BFLP designated areas for housing that are near, and in two cases, adjacent to the Sandhurst boundary. These sites are expected to come to fruition within the near future. Full details of these sites are included within the NP. It should also be noted that the Derby Field housing allocation is only 1km from the Bloor owned land.
- 5.1 In addition to the BFLP designated areas for housing that are located near to Sandhurst, cognisance was given to the adjacent areas included within Wokingham Borough Council, Surrey Heath Borough Council and Hart District Council. Areas within the foregoing Council borders are adjacent to the boundary of Sandhurst Town Council. As a consequence, STC also considered the potential large and medium housing sites that had high expectancy of coming to fruition in the near future. These areas being far closer to Sandhurst than Bracknell Town which is circa 5 miles to the north of Sandhurst. Related considerations were considered when drafting the NP's policies (including the benefits to the nearby communities in designating LGS 6 as Local Green Space). The potential nearby developments also assisted the shaping of NP policies regarding Transport Assessments and Transport Statements. Turley appear not to have taken cognisance of these matters.
- 6 Policy Duplication and Detail Policy Comments.NP Policy H 1.** This policy sets out the housing intentions of the Sandhurst residents. The Sandhurst residents' views were obtained by extensive questionnaire and public exhibitions. It is considered that it is clear in its intent.

- 6.1 **NP/ H 2.** This policy seeks to enhance and indeed noted that it is to be read in conjunction with BFLP policy LP32.
- 6.1 **NP/ D 3.** The policy relates to general listed buildings and importantly includes comments relating to St Michael's and All Angels Church. It is therefore considered valid and appropriate. We would also remind Turley that it notes its compliance with BFLP policy LP 29.

7 **Comments on Detailed Policies**

- 7.1 **NP/H 1.** The policy complies with the BFLP in that no large or medium site allocations have been included within Sandhurst.
- 7.2 **NP/H 2.** The policy complies with the intentions of the BFLP.
- 7.3 **NP/D 4.** We do not consider that the policy is overly prescriptive. The reason for the drafting of this policy was to enhance and retain the foreground and background trees and hedgerows to enhance the appearance of housing within Sandhurst which is, generally, of mediocre architectural value. It also supports the intentions of the NP Appendix 5 (Chapter 2 Sandhurst Study area). Additionally, it has biodiversity gain. We would note that similar worded NP policies have been included within other English NPs for similar reasons to that applicable to Sandhurst. We would note that their implementation has worked successfully. We therefore see no reason why this policy should be reduced in scope.
- 7.4 **NP/EN 1.** STC does not accept Turley's comment. The policy sets out to enhance BFLP policies LP 35, LP 47 and LP 49. The intention of the policy is to emphasise its related importance to the Blackwater Valley Corridor and the Crowthorne / Sandhurst Heathland Mosaic that occur within the Sandhurst boundary.
- 7.5 **NP/EN 2.** STC do not accept Turley's comments. The policy wording has been taken from BVCP documentation that was supported by numerous nearby Authorities, including BFC.
- 7.6 **NP/ EN 5. (including Turley's conclusion).** STC would reiterate comments made previously that the Local Green Space LGS 6 has been carefully considered and comprehensive related evidence has been provided within NP Appendix 4. Each and every sub para of NPPF 107 has been considered in detail and summary evidence provided within NP Appendix 4. **As noted previously Turley appear to have taken little or no cognisance of the significant evidence provided within NP Appendix 4 which supports the consideration that the designations of LGS 6 and LGS 7 to fully comply with NPPF para 107.**
 - 7.6.1 STC emphasises that government guidance notes do not preclude private land from being designated as Local Green Space. In respect of access to Local Green Spaces LGS 6 and LGS 7, we would refer Turley to NP Appendix 4, section 7.

- 7.6.2** It should be emphasised that an historic public right of way is included within LGS 6; it is known as the Three Castles Path. The path is of historic interest because it follows the original route used by King John (1167-1216) when travelling between the castles at Windsor, Odiham and Winchester Great Hall. For the benefit and enjoyment of its users, it is important that the path retains its rural views. This is an additional reason why LGS 6 has been designated as Local Green Space.
- 7.6.3** Turley are also reminded that land within LGS 6 has previously been recognised by BFC as possessing **Landscape of Special Importance** and has been identified by the BVCP as key to retain because it is one of the last areas within the Blackwater Valley with a rural and elevated backdrop. This provides a rural ambience to the visitors to the SANG and Nature Reserves associated with land in and near Horseshoe Lake and Grove Lake. The elevated field margins that occur to the northern side of the Lakes shields from view the housing and buildings of the settlement of Sandhurst.
- 7.7** **Policy NP T 1.** The policy is not a duplication of BFLP 60. Policy NP/ T 1 sets out to enhance the requirements of BFLP 60. Guidance notes regarding NP/ T 1 are included within Section 6 of the NP. The Steering Group would particularly refer Turley to NP para 6.1.6 that demonstrates precise parameters that relate to Sandhurst and how these parameters should be used when compiling Transport Statements and Transport Assessments. The drafting of NP/T 1 was instigated following overwhelming concerns expressed by Residents regarding traffic congestion. These views were obtained following comprehensive feedback from questionnaire responses and Public Exhibitions.
- 7.8** **Policy NP/ T 3, residential parking.** The comment that the NP does not provide sufficient evidence to support its drafting is considered incorrect. STC would refer Turley to the significant related evidence that is included within NP Appendix 1. It should be noted that the explanatory notes within NP section 6 make reference to the related paragraphs within NP Appendix 1. It would appear from Turley's comments that they may have not taken into account the comprehensive information included within NP Appendix 1.
- 7.8.1** We are unclear as to where Turley have sourced the reference to the comments that they have made. Para 6.2.18 of the NP clearly defines car charging information. Para 6.2.19 confirms that parking bay sizes and associated carparking dimensional requirements will comply with the current BFC Parking Standards Supplementary Planning Document.
- 8** **Conclusion. STC consider that many of the Turley comments in relation to the NP are fundamentally flawed. In respect of the comments that Turley have made regarding the designation of LGS 6 as Local Green Space it would appear that they have not taken into consideration the comprehensive evidence and information that has been included within both the NP and the**

associated Appendices. As noted previously STC can find little or no confirmation that Turley have read NP Appendix 4, this would include the comprehensive evidence regarding the compliance with NPPF para 107 relating to the designation of LGS 6 as Local Green Space.

9 EDP's (on behalf of Bloor Homes) views included within the Turley response to the Regulation 16 comments: -

9.1 It would appear that the EDP response is a near duplication of their Regulation 14 consultation comments. It adds nothing to the STC responses included within the Consultation Statement. As a consequence, the comments included within the Consultation Statement (pages 171 to 180) are very much valid. It would appear that none of the STC Consultation Statement comments have been queried.

9.2 There is, however, one item within EDP's response that the Steering Group would like to pick up on. This relates to the EDP para 3.14 (third item). EDP state '*20th century conurbations, including Camberley, sprawl along the Blackwater Valley with associated roads (including the M3) dissecting heathland and woodland into blocks*'. This comment is considered very relevant to the importance of the designation of LGS 6 and LGS 7 as Local Green Space. The areas within the Blackwater Valley near and including Horseshoe and Grove Lakes have been identified by the BVCP as being one of the most significant areas that still possesses a rural ambience. Therefore, to progress with the intentions of the original County Councils of Hampshire, Surrey and Berkshire (and subsequently the BVCP) it is vital that measures be instigated to retain the background and elevated field margins incorporating LGS 6 and LGS7. The retention of this greenspace being instigated to avoid an extension of the urban sprawl appearance that many other areas of the Valley have.

10 The conclusion Sandhurst Town Council's Consultation Statement therefore remains the same. These can be summarised as: -

10.1 EDP are considered not to have correctly used the interpretation of 'Natural England's Green Infrastructure Standards for England – Summary (January 2023)'. It would appear that in making their comments regarding 'Proximity' (their para 3.4) that EDP have referenced distances applicable to Small Greenspace of between 2 ha and 10 ha. Whereas LGS 6 should fall within the Medium-Large Greenspace category (item 3 on page 35 of the Natural England Document). It is therefore considered that EDP have failed to justify that LGS 6 is remote from the community it serves. Indeed, using the appropriate data, LGS 6 is under the recommended accessible distances for the size of the related greenspace. EDP are reminded that LG6 primarily serves the communities of Sandhurst, Yateley, Finchampstead and Eversley. We would particularly note that the northwestern community of Yateley is very close to LGS 6 (circa 660m). EDP are therefore

considered to have **failed** to provide evidence that LGS 6 is not in reasonably close proximity to the community it serves.

It is acknowledged that the parameters set out in Natural England's document relating to accessibility of greenspaces are not specifically intended to apply to Local Green Spaces/compliance with NPPF para 107. However, STC consider that Natural England's recommendations regarding walking distances, related to the greenspace size, could be used to support a 'proximity' test in respect of closeness to communities.

10.2 EDP have **not** provided reasonable evidence that supports the view that LGS 6 is not demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife. **EDP in providing their comments have failed to take cognisance of the historic and current views and visions of the BVCP and previous Local Plan designations by BFC. All as included and evidenced within NP Appendix 4.**

10.3 EDP are considered to have **failed** to provide reasonable evidence that supports their view that LGS 6 is not local in character and is an extensive tract of land. In providing their evidence EDP did not provide accurate evidence that LGS 6 should be considered arbitrary countryside that could be described as an extensive tract of land. EDP appear to have taken little, or no cognisance of the comprehensive evidence provided within NP Appendix 4 section 5 and the summary contained within Sandhurst Town Council's response included within the Consultation Statement. This evidence provides substantiation that LGS 6 and LGS 7 possess landscape local in character. EDP appear not to have queried the accuracy of any of the evidence provided within NP Appendix 4 or Sandhurst Town Council's comments included within pages 171 to 180 of the Consultation Statement. EDP are also reminded of the Steering Group's response that is included within NP's Regulation 16 comment documentation. This response includes Local Green Space size information relating to the neighbouring Borough of Wokingham (this includes Finchampstead Parish Council). Information obtained from Wokingham show that they consider that Local Green Space designation is acceptable that are more than the size of LGS 6.

11 Summary relating to matters associated with the interpretation of what constitutes Local Green Space that complies with NPPF para 107 (Dec 2024).

11.1 NPPF para 107 contains some general requirements regarding perceived distances and sizes. These include interpretation of '*in reasonably close proximity to the community it serves*' and '*is not an extensive tract of land*'.

- 11.2 The NPPF and related Government Guidance Notes do not include any precise distance and size definitions. The Government Guidance Notes do, however, record that Local Green Space can include private land.
- 11.3 Notwithstanding the above Natural England produced a Green Infrastructure document ‘Green Infrastructure for England – Summary. Green Infrastructure Framework-Principles and Standards for England (January 2023 version 1.1). This document sets out in some detail key parameters relating to actual walking distances and size criteria relating to Greenspace. The report was assisted and advised by seventy-three key Consultants, interested organisations and Authorities. The whole intention of the Natural England document is to ensure that communities are provided with nearby Greenspace. This statement in respect of Local Green Space is qualified by the comments included within the last item of para 10.1. above. The designation of LGS 6 was primarily instigated to ensure that the elevated field margins be retained to provide a rural ambience for the visitors to the nearby SANG and nature reserve areas.
- 11.4 The Natural England document is deemed to be of relevance and could be of assistance when determining Local Green Space designations. Indeed, EDP had made reference to this document when making their regulation 14 and 16 comments.
- 11.5 Key matters relating to size and proximity of Greenspaces are detailed on pages 34 and 35 of Natural England’s document. Reference to NP Appendix 4, (and in particular section 5) provides evidence that LGS 6 and LGS 7 fall well within the distance and size parameter set by Natural England, we also would note that access information is included within NP Appendix 4 para 7.5.
- 11.6 Further information regarding comments that Turley and EDP have made are included within STC’s response to the BFC comments. We would refer Turley and EDP to the related sections within STC’s response
- 11.7 We would also remind Turley/ EDP of STC’s comments within the Reg 14 Consultation Statement. We are particularly disappointed that much of the Turley/EDP regulation 16 comments are, in large part, a duplication of their regulation 14 comments. The regulation 14 comments received a comprehensive response by STC within the Consultation Statement (Section 5 page 169 of the document). Comments relating to EDP were included within para 5.4 (and onward within the Consultation Statement). It is reiterated EDP Regulation 16 comments are very much a duplication of their Regulation 14 response. In respect of the Turley/EDP Regulation16 response it is reiterated that it would appear they have taken little cognisance of the detailed evidence contained within NP Appendix 4, and the Consultation Statement (section 5).