

# **Sandhurst Neighbourhood Development Plan 2026-2037**

**A report to Bracknell Forest Borough Council  
on the Sandhurst Neighbourhood Development  
Plan**

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## **Executive Summary**

- 1 I was appointed by Bracknell Forest Council in June 2026 to carry out the independent examination of the Sandhurst Neighbourhood Development Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 24 July 2026.
- 3 The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding its character and appearance. It also proposes the designation of a series of Local Green Spaces. The Plan has been prepared in short order.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Sandhurst Neighbourhood Development Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

**Andrew Ashcroft**  
**Independent Examiner**  
**12 October 2026**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Sandhurst Neighbourhood Development Plan 2026-2037 (the 'Plan').
- 1.2 The Plan has been submitted to Bracknell Forest Council (BFC) by Sandhurst Town Council (STC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) 2012 and its updates in 2018, 2019, 2021, 2023, 2024 and 2026. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as a result of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. Any plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the development plan. It has a clear focus on maintaining the character and appearance of the neighbourhood area and designating Local Green Spaces.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and a referendum has a positive outcome the Plan would then be used to determine planning applications within the neighbourhood area and will sit as part of the wider development plan.

## 2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by BFC, with the consent of STC, to conduct the examination of the Plan and to prepare this report. I am independent of both BFC and STC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. I have 43 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have extensive experience of examining neighbourhood plans. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral Service.

### *Examination Outcomes*

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted proceeds to a referendum; or
  - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
  - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Sections 7 and 8 of this report.

### *Other examination matters*

- 2.6 In examining the Plan I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
  - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
  - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report. I am satisfied that the submitted Plan complies with the three requirements.
- 2.8 Section 98 of the Levelling-up and Regeneration Act 2023 requires that a neighbourhood plan:

- so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, must be designed to ensure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change; and
- so far as the qualifying body considers appropriate and having regard to the subject matter of the plan, must be designed to take account of any local nature recovery strategy under section 104 of the Environment Act 2021 that relates to all or part of the neighbourhood plan area.

2.9 I have addressed the matters identified in paragraph 2.8 of this report and have taken account of the information in the Basic Conditions Statement. I am satisfied that the submitted Plan complies with these two requirements.

### 3 Procedural Matters

3.1 I have considered the following documents during the examination:

- the submitted Plan;
- the Basic Conditions Statement;
- the Basic Conditions Statement (April 2026);
- the Consultation Statement;
- the BFC SEA/HRA Determination Statement;
- the Local Green Spaces study (Appendix 4);
- the Character Area Assessment Supplementary Planning Document (Appendix 5);
- the representations made to the Plan;
- STC's responses to the clarification note;
- the adopted Bracknell Forest Local Plan (BFLP) (2024);
- the National Planning Policy Framework (December 2024 and August 2026);
- Planning Practice Guidance;
- Relevant Written Ministerial Statements.

3.2 I visited the neighbourhood area on 24 July 2026. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is covered in more detail in Section 5 of this report.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted Plan, I was satisfied that the Plan could be examined without the need for a public hearing. In coming to this conclusion, I took account of the comments made on the Plan, the level of detail in the Plan and its supporting documents.

3.4 An updated version of the National Planning Policy Framework (NPPF) was published on 17 August 2026 as the examination of the Plan was taking place. As the Plan had been submitted to BFC before that date the examination proceeded on the basis of the Implementation arrangements set out in Annex A (6) of the 2026 NPPF.

## 4 Consultation

### *Consultation Process*

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012, STC has prepared a Consultation Statement. The Statement sets out the mechanisms used to engage all concerned in the plan-making process. It also provides specific details about the consultation process that took place on the pre-submission version of the Plan (November 2025 to January 2026). It captures the key issues in a proportionate way and is then underpinned by more detailed appendices.
- 4.3 The Statement sets out details of the comprehensive range of consultation events and activities that were carried out in relation to the initial stages of the Plan. I am satisfied that they were comprehensive and proportionate to the neighbourhood area.
- 4.4 The Statement also provides details of the way in which STC engaged with statutory bodies. I am satisfied that the process has been proportionate and robust.
- 4.5 The Statement summarises the key issues arising from the consultation process on the pre-submission Plan. Appendices provide details about the comments received during the consultation process from statutory bodies on the pre-submission version of the Plan.
- 4.6 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation.
- 4.7 From all the evidence provided to me as part of the examination, I am satisfied that STC sought to engage with residents, statutory bodies and the development industry as the Plan has been prepared.

### *Representations Received*

- 4.8 Consultation on the submitted plan was undertaken by BFC and ended on 1 July 2026. This exercise generated comments from the following organisations:

- The Coal Authority
- National Grid Electricity Transmission
- National Highways
- National Gas Transmission
- UK Health Security Agency
- Beechcroft Developments Limited
- Finchampstead Parish Council

- Waverley Borough Council
- Bracknell Forest Council
- Bloor Homes Limited
- Surrey County Council
- Thames Water
- Historic England
- Natural England

4.9 Representations were also received from several residents in the neighbourhood area.

4.10 I have taken account of the various representations as part of the examination of the Plan. Where it is appropriate to do so, I make specific reference to the individual representations in Section 7 of this report.

## 5 The Neighbourhood Area and the Development Plan Context

### *The Neighbourhood Area*

- 5.1 The neighbourhood area is the parish of Sandhurst. It is located around 30 miles southwest of London, three miles north-west of Camberley and five miles south of Bracknell. The neighbourhood area was designated on 12 January 2024. Its population in 2021 was approximately 21,000 persons.
- 5.2 The town experienced significant growth from the late 1950s to the 1980s as large housing estates were built creating the current town from the original four villages of College Town, Central Sandhurst, Little Sandhurst and Owlsmoor. The town now enjoys a bustling district centre and a railway station.
- 5.3 The Royal Military Academy is located in Sandhurst. It occupies a significant part of the eastern extent of the neighbourhood area

### *Development Plan Context*

- 5.4 The Bracknell Forest Local Plan (BFLP) was adopted in March 2024. It sets out the basis for future development in the Borough up to 2037. The development plan also includes 'saved' policies in the Site Allocations Local Plan (which was adopted in 2013). This includes Policy SA10 'Royal Military Academy, Sandhurst'.
- 5.5 BFLP Policy LP1 comments that development will be focused on Bracknell which is the most sustainable settlement in the Borough, making maximum use of previously developed sites and underutilised land, especially in and around Bracknell Town Centre. Mixed use development is proposed to help the continued revitalisation of the area. This should provide the flexibility to respond to continually changing retail, leisure and other 'main town centre' floorspace needs in a way that enables the area to develop its character and offer in a manner that distinguishes it from other competing centres.
- 5.6 Policy LP1 also advises that Crowthorne and Sandhurst do not have as wide a range of services and facilities as Bracknell. However, it comments that they are sustainable locations providing employment, retail, education, health, access to public transport including buses, access to two train stations on the Reading to Gatwick Line and other community facilities. The policy comments that whilst options for growth in these centres are limited, there may be small scale opportunities for intensification and extensions where appropriate. This would assist in ensuring that suitable floorspace is available to allow centres to adapt and meet the changing needs of local communities. Other Local Centres in the settlements are also important in helping to meet the day-to-day needs of local residents. They are within walking distance of many residents and therefore help reduce the need to travel. In this context Crowthorne and Sandhurst are identified as Tier 2 towns in the settlement hierarchy in BFLP Policy LP2.
- 5.7 The BFLP does not allocate any sites for residential development in the Sandhurst neighbourhood area.

5.8 The following other policies in the BFLP are particularly relevant to the submitted Plan:

|             |                                                   |
|-------------|---------------------------------------------------|
| Policy LP27 | Climate Change                                    |
| Policy LP28 | Design Principles                                 |
| Policy LP32 | Thames Basin Heaths Special Protection Area       |
| Policy LP35 | Development in the Countryside                    |
| Policy LP40 | Housing mix                                       |
| Policy LP44 | Protection of community facilities and services   |
| Policy LP54 | Protection and enhancement of trees and hedgerows |
| Policy LP56 | Renewable and low carbon energy                   |

5.9 The submitted Plan has been prepared within its wider development plan context. In doing so it has relied on up-to-date information and research that has underpinned previous and existing planning policy documents in the Borough. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

#### *Unaccompanied Visit*

5.10 I visited the neighbourhood area on 24 July 2026. I approached from the A30 (Blackwater) to the south and east. This allowed me to understand its connection with the strategic highway network and its wider setting in the landscape.

5.11 I looked at the parts of the town directly affected by its policies for Local Green Spaces and for the district centre.

5.12 I saw the scale and significance of the Royal Military Academy during the visit.

## 6 The Neighbourhood Plan and the Basic Conditions

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented and informative document that is proportionate to the Plan.

6.2 As part of this process, I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- not have the effect of preventing development from taking place which is proposed in the development plan for the area of the authority;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

6.3 I assess the Plan against the basic conditions under these matters below:

### *National Planning Policies and Guidance*

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in December 2024.

6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are particularly relevant to the Sandhurst Neighbourhood Plan:

- a plan led system – in this case the relationship between the neighbourhood plan and the adopted Bracknell Forest Local Plan;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF

indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.7 In addition to the NPPF, I have also taken account of other elements of national planning policy including Planning Practice Guidance and relevant ministerial statements.
- 6.8 I have considered all the evidence and representations available as part of the examination. On this basis I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms subject to the recommended modifications included in this report. It sets out a positive vision for the future of the neighbourhood area with a focus on maintaining the character and appearance of the neighbourhood area and designating Local Green Spaces. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.9 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This matter is reinforced in Planning Practice Guidance. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.10 As submitted the Plan does not fully accord with this range of practical issues. Many of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan has regard to national policy.

*Contributing to sustainable development*

- 6.11 There are clear overlaps between national policy and the way in which the submitted Plan contributes towards sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. The submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for residential development (Policies NP/H1 and H2) and retail uses (Policy NP/ERB1). In the social dimension, it includes policies on Local Green Spaces (Policy NP/EN5), and on community related uses (Policies NP/C1 and C2). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has a range of environment-related policies (Policies NP/EN1-EN4 and D2-D4). STC has undertaken its own assessment of this matter in the submitted Basic Conditions Statement.

*Not have the effect of preventing development from taking place which is proposed in the development plan for the area of the authority*

- 6.12 I have already commented in detail on the development plan context in Bracknell Forest Borough in paragraphs 5.4 to 5.8 of this report.

- 6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Whilst the Plan proposes a series of policies relating to its built and natural environment, it does not prevent the potential for new development to come forward for infill development in the town in accordance with the approach taken in the Local Plan. In this broader context I am satisfied that the implementation of the Plan will not have the effect of preventing development from taking place which is proposed in the development plan.

*Strategic Environmental Assessment*

- 6.14 The Neighbourhood Planning (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons explaining why an environmental report is not required.
- 6.15 In order to comply with this requirement BFC undertook a screening exercise (October 2025) on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. As a result of this process, it concluded that the Plan is not likely to have any significant effects on the environment and accordingly would not require SEA.

*Habitat Regulations Assessment*

- 6.16 The screening statement also included a separate section on the need for a Habitats Regulations Assessment (HRA) of the Plan. It concludes that the Plan is not likely to have significant environmental effects on habitat sites or undermine their conservation objectives (either alone or in combination) and taking account of the precautionary principle. On this basis it concludes that Appropriate Assessment is not required.
- 6.17 The HRA report is both thorough and comprehensive. It advises about the potential impact of the Plan on the following sites which are either in or within close proximity to the neighbourhood area:
- Thames Basin Heaths Special Protection Area (SPA);
  - Windsor Forest and Great Park Special Area of Conservation (SAC);
  - Thursley, Ash, Pirbright and Chobham SAC (which sits largely within the Thames Basin Heaths SPA); and
  - Chilterns Beechwoods SAC.

It provides assurance to all concerned that the submitted Plan takes appropriate account of important ecological and biodiversity matters.

- 6.18 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of the basic conditions.

*Human Rights*

- 6.19 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. In addition, there has been a full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. Based on all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

*Summary*

- 6.20 On the basis of my assessment of the Plan in this section of my report, I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

## 7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that they have the necessary precision to meet the basic conditions.
- 7.2 The modifications focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended modifications to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. STC, and the wider community have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans must address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted plan. Where necessary I have identified the inter-relationships between the policies.
- 7.6 For clarity this section of the report comments on all the policies in the Plan.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing modifications to the text of the Plan are set out in italic print.

The initial section of the Plan (Sections 1-3)

- 7.8 The initial parts of the Plan set the scene for the policies. They do so in a proportionate way. The Plan is presented in an effective fashion. It makes good use of well-selected maps. A very clear distinction is made between the policies and the supporting text. It also highlights the links between the Plan's objectives and its resultant policies.
- 7.9 The Introduction addresses the background to neighbourhood planning. It comments about how the Plan has been prepared, and how it will be used. It also comments about the importance of the Royal Military Academy in the neighbourhood area.
- 7.10 The Introduction sets out a comprehensive Vision for the Plan as follows:

*'By 2037, Sandhurst will be a thriving town that recognises the uniqueness of its four distinct ward areas (Little Sandhurst, central Sandhurst, Owlsmoor and College Town), each with its own identity and environment. Sandhurst will have sustainable open spaces that will be available to enhance the health and wellbeing of its residents and visitors. It will play a key part in the wider area's commitment to carbon reduction and green energy generation. There will be a widely accepted commitment to measures that will limit the effects of climate change. It will be a great place to live, work and play.'*

- 7.11 The Introduction also includes a comprehensive schedule of objectives (in Section 1.3.2).
- 7.12 Section 2 provides information about the wider planning process and the production of the Plan. In addition, it comments about the way in which local people and organisations were engaged in the production of the Plan. This overlaps with the details in the Consultation Statement (as summarised in Section 4 of this report). The neighbourhood area is shown on Map 1. Whilst the Plan period is indicated on the front cover, I recommend that it is weaved into the text in this part of the Plan.

*Replace the penultimate paragraph on page 7 with:*

*'BFC is the Planning Authority for Sandhurst. The BFLP forms part of the development plan which is used when making planning decisions in the Borough and covers the period to 2037. The neighbourhood plan follows its timescale and has a plan period from 2026 to 2037.'*

- 7.13 Section 3 comments about the context provided by the Bracknell Forest Local Plan and Site Allocations Local Plan to the preparation of the neighbourhood plan.
- 7.14 Sections 4 to 10 of the Plan provide background information and proposed policies based around a series of topic areas.
- 7.15 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Potentially repetitive policies

- 7.16 Several of the policies in the submitted Plan have overlaps with national policies and/or policies in the adopted Local Plan. On the one hand, this helps to provide assurance that the Plan meets the basic conditions and consolidates such policies. However, on the other hand, paragraph 16f of the NPPF advises that policies should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). This tension generated a series of comments from BFC and the development industry.
- 7.17 I sought STC's comments on this matter on a series of policies in the clarification note. I have taken account of its very detailed comments. I address the relevant policies in turn. My general approach is to safeguard policies which bring a local distinctiveness to the relevant issue. Where this is not the case, I recommend the deletion of the policy to avoid the unnecessary duplication as set out in the NPPF.

Policy NP/H1 Housing

- 7.18 This policy has three main elements. The first is that affordable and starter homes will be supported providing they meet other development plan policies. The second is that encouragement will be given to appropriate density development proposals on brownfield sites within the settlement of Sandhurst. The third is that development proposals that occur within zones of influence of the Thames Basin Heaths SPA must comply with BFLP Policy LP 32.

- 7.19 This policy has attracted representations both from BFC, Bloor Homes and Beechcroft Developments Limited.
- 7.20 I have considered the policy and the representations very carefully. I have concluded that the policy does not bring any local distinctiveness to national and local planning policies. The development of brownfield sites is addressed in Sections 5 and 11 of the NPPF, and in Policies LP1-LP3 of the adopted BFLP. The third part of the policy simply requires that development proposals in the zones of influence of the Thames Basin Heaths SPA should comply with BFLP Policy LP32. Whilst I could recommend that the policy is modified, it would simply result in a repeat of the policies concerned. In the circumstances, I recommend that the policy and the supporting text are deleted.

### **Delete the policy**

*Delete paragraphs 3.3.5, 3.6.2, and Sections 3.7 and 3.8*

Policy NP/H2 Developments in the settlement of Sandhurst and in the countryside

- 7.21 The policy advises that proposals for new development will be directed towards locations within the settlement boundary. It also comments that development within the defined settlement boundary is accepted in principle providing it is proportionate to the scale, role and function of the settlement. Finally, it comments that development proposals that occur outside the settlement boundaries are considered to be located within countryside.
- 7.22 Beechcroft Developments Limited comment that it:
- ‘(considers) the current wording of Policy NP/H2 to be too narrow in scope in terms of locations where development will be supported. This risks not achieving the specified objectives of Policy NP/H1. We therefore recommend part b) of the policy includes additional wording which sets out circumstances where development outside the settlement boundary of Sandhurst would be acceptable, for instance the redevelopment and repurposing of previously developed land (brownfield sites), amongst others. In lieu of allocating specific sites for development within the Sandhurst neighbourhood plan area, providing additional circumstances whereby development would be permitted outside of the settlement area would increase chances of successfully achieving the policy aspirations and objectives of the plan whilst still adhering to the environmental objectives.’*
- 7.23 BFC comments that:
- ‘It is unclear what this policy adds over and above BFLP policies, especially as the Development Plan needs to be read as a whole (NPPF para. 2), serve a clear purpose and avoid unnecessary duplication (NPPF para. 16f). Recommend policy is deleted.’*
- 7.24 Bloor Homes comments that:
- ‘NP/H2 continues to direct development towards the defined settlement boundary and relies on the Local Plan and NPPF for development outside the settlement. This adds little to the existing policy framework and risks creating confusion through repetition.’*

7.25 In its response to the clarification note STC commented that

*‘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.’*

7.26 I have considered these comments carefully. On the balance of the evidence, I am satisfied that the approach taken in the policy is appropriate. It sets out an overall spatial strategy for the neighbourhood area. However, in this broader context I recommend that the policy is recast to address the following related matters:

- the need for the policy to define the settlement boundary;
- the inclusion of a reference to residential amenity into the first part of the policy;
- a recasting of the wording used so that it will bring the clarity required by the NPPF and to allow BFC to be able to use it in the development management process; and
- the inclusion of commentary in the second part of the policy about the potential for development in the countryside as set out in national and local policies. This reflects the detail in paragraph 3.9.3 of the Plan.

7.27 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**Replace the policy with:**

**‘Proposals for new development will be directed towards locations within the settlement boundary (as shown on Inset Map 7 in Section 12 of this Plan). Development proposals within the defined settlement boundary will be supported where they are proportionate to the scale, role and function of the settlement and respond positively to amenities of residential properties in their immediate locality.**

**Development proposals outside the settlement boundaries are considered to be located within countryside and will be determined on the basis of national and local planning policies for such locations.’**

Policy NP/D1 Storey Heights

7.28 The supporting text advises that potential upward extensions to existing residential and commercial buildings will be supported providing that such extensions are sympathetic to local character and history, including the surrounding built environment and landscape setting, whilst not preventing or discouraging innovation or change (such as increased densities). The Plan comments that they would also need to be consistent with the prevailing form of neighbouring properties and the overall street scene.

7.29 I noted the height and character of buildings in the neighbourhood area during the visit.

7.30 The approach taken in the policy is appropriate. Nevertheless, I recommend that the wording used is modified so that it is clear about what is required and that it identifies

how potential exceptions can be considered. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘The height of new development proposals should respect the format and scale of the existing buildings in Sandhurst. In this context, developments of more than three storeys will not be supported unless there is clear evidence that the proposal concerned is appropriate to its immediate locality.’**

Policy NP/D2 Residential Developments on Brownfield Sites Infill Sites and Development of Residential Gardens within the settlement of Sandhurst

- 7.31 This policy sets out detailed guidance for residential developments on brownfield sites and the development of residential gardens.
- 7.32 Whilst the policy follows the approach in national and local planning policies, I am satisfied that several of its criteria are distinctive to the neighbourhood area. Within this context I recommend detailed modifications to the wording used in the policy to bring the clarity required by the NPPF and to allow BFC to be able to implement its approach through the development management process. In taking this approach, I have considered the representation received from Beechcroft Developments Limited and STC’s responses to those comments.
- 7.33 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**Replace the policy with:**

**‘Proposals for the residential development of brownfield sites, infill sites and residential gardens will be supported where they meet the following criteria:**

- they accord with the general character of the area;
- they incorporate and integrate the landscape features of the area;
- they include boundary treatments that reflect the nearby character of the area;
- any front garden entrance gates and walls reflect the character of the surrounding area;
- where the character of the immediate locality incorporates an open plan front garden design this approach is replicated in any new or modified development;
- they minimise the need for external lighting above that required for public safety reasons;
- they respond positively to the scale, height, form, and massing of the immediate locality;
- their elevational materials are compatible with the materials of the character of the area;

- they safeguard the privacy and amenity of existing properties in the immediate locality;
- they do not lead to a significant loss or harm to the environmental or amenity value of residential gardens;
- waste bins and containers, where stored in front gardens, are within a screened enclosure;
- where existing front gardens are required to incorporate adequate parking space as much as practicable of the remainder of the garden is retained as soft landscaping;
- parking to the front of dwelling incorporates permeable surfacing to reduce discharge into existing highway drains. Dwelling parking constructed utilising gravel (or similar) should include mitigation to prevent the surfacing being deposited onto adjacent footpaths or roads, whether this be caused by driveway usage or rainwater runoff; and
- proposed developments use SuDs wherever practicable in areas at risk of flooding. The use of rainwater harvesting is encouraged.'

Policy NP/D3 Conservation and Enhancement of Grade II\*, Grade II Listed and Locally Listed Buildings

- 7.34 This policy seeks to ensure that development proposals will protect or enhance listed and locally listed buildings. In this context the policy will complement the approach taken in BFLP Policy LP29 which addresses proposals directly affecting listed buildings.
- 7.35 In general terms the policy addresses this matter in a positive way which has regard to Section 16 of the NPPF. In this broader context, I recommend that the policy is recast to bring the clarity required by the NPPF:
- a simplification of the language used so that it refers to listed buildings rather than the grade of the building;
  - ensuring that the second element of the policy has a positive rather than a negative focus; and
  - revising the approach towards the church spire so that it comments about the design of development proposals and the practicability of taking such an approach.
- 7.36 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**'Development proposals of adjacent or nearby sites associated with listed and locally- listed buildings should demonstrate how they will conserve and enhance the character of the area, and the setting of the heritage asset concerned.'**

**Development proposals in the immediate locality of St Michael's and All Angels Church in Lower Church Road Sandhurst should respond positively to its semi-rural and tranquil churchyard setting. Wherever practicable, development proposals should be arranged and designed to safeguard the views of the Church spire from the immediate locality.'**

Policy NP/D4 Trees and hedgerows

- 7.37 This is a comprehensive policy on safeguarding existing trees and hedges and the way in which any replacements should take place through the development management process.
- 7.38 Bloor Homes and Beechcroft Developments Limited comment about the standards for replacement trees and hedges. BFC raises the same issue alongside other comments on the policy.
- 7.39 I sought advice from STC about the extent to which it had produced a distinctive and robust justification for the proposed replacement standards. In its response to the clarification note it commented that:
- '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.'*
- 7.40 I have considered the policy carefully alongside the representations. Based on all the evidence I recommend that the policy is recast so that it sets out general details and acknowledges that the ambitions of the policy may not always be practicable. Furthermore, I am not satisfied that the approach taken in the seventh part of the policy is underpinned by appropriate and robust evidence. This is an important consideration both generally, and given the nature of the requirements in this part of the policy. I also recommend the deletion of the sixth part of the policy which addresses the unauthorised felling of trees. This is a process issue to be addressed through the development management process rather than a policy matter. I also recommend consequential modifications to the supporting text.
- 7.41 Finally I recommend that the fourth part of the policy is deleted and repositioned into the supporting text. This acknowledges that it is a process matter (the preparation of a tree protection plan and arboricultural method statement to accompany development proposals) rather than a policy matter.
- 7.42 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Wherever practicable, development proposals should retain mature and important trees, groups of trees or woodland.**

**Wherever practicable, development proposals should also seek to retain significant hedgerows, where such hedgerows enhance the street scene.**

**Wherever appropriate, the planting of additional native trees that possess reasonable disease resistance should be included in new developments, particularly local species that are in keeping with the character of the area. Planting that contributes to the biodiversity of the area and supports green corridors will be supported.**

**Where a loss of trees and/or hedgerows is unavoidable, the planting of replacement trees of similar species and amenity value should be incorporated into the proposal concerned.’**

*Replace paragraphs 4.3.9 and 4.3.10 with:*

*‘Policy NP/D4 seeks to safeguard existing important trees and significant hedgerows, it also comments that wherever appropriate the planting of additional native trees, that possess reasonable disease resistance, should be included in new developments, particularly local species that are in keeping with the character of the area.*

*Where mature or important trees are present, and could be affected by a proposed development, the relevant planning applications should be supported by a proportionate tree survey, tree protection plan and an arboriculture method statement.’*

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

- 7.43 The Plan comments helpfully about the objectives of Policies NP/EN1-EN4. It advises that the Blackwater Valley Corridor (BVC) was defined by the Blackwater Valley Countryside Partnership (BVCP). The formation of the BVCP followed on from an initiative led by the County Councils of Hampshire, Berkshire and Surrey, with the view of providing a strip of natural green space along the River Blackwater between Aldershot and Eversley, to be provided for the public’s enjoyment and outdoor recreation purposes. The intention was to create a delightful strip of restored land arising from the completion of gravel extraction to elements of the Corridor. The original initiative of the three County Councils was joined by other nearby authorities to instigate a coordinated and unified approach to achieve the original objectives. STC is one of these authorities.
- 7.44 Policy NP/EN1 is general in nature. It comments that development proposals will only be permitted where they recognise and enhance the character and quality of the landscape character area within which they are situated and protect and enhance the setting of individual settlements and their distinct characters.

7.45 BFC comment that:

*'The policy wording is almost a direct copy of criteria 2 and 3 wording of BFLP Policy LP36 'Landscape character'. It therefore does not 'enhance' BFLP Policies LP35, LP47 or LP49 as stated in para. 5.4.8. The Development Plan needs to be read as a whole (NPPF para. 2) and policies should avoid unnecessary duplication (NPPF para. 16f), so it is unclear what the value of the policy is.'*

7.46 Bloor Homes and Beechcroft Developments Ltd make similar comments.

7.47 In its response to the clarification note, STC comment that:

*'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.'*

7.48 I have considered the policy and the representations carefully. I have concluded that the policy brings no added or distinctive value beyond the relevant policies in the Local Plan. On this basis I recommend that it is deleted.

7.49 The broader supporting text provides an overall context for policies NP/EN2-EN5. On this basis it is appropriate that it should remain in the Plan (other than the one paragraph which relates directly to Policy NP/EN1).

### **Delete the policy**

*Delete paragraph 5.4.8*

Policy NP/EN2 Wildlife within the Blackwater Valley Corridor

7.50 This policy relates to wildlife in the BVC. It has two parts. The first comments that development proposals need to demonstrate that there will be no adverse impact on wildlife. The second comments that proposals that would increase the size of wildlife sites and/or the wildlife value of BVC wildlife sites will be supported.

7.51 BFC comment that the first part of the policy is potentially restrictive and that the second part of the policy goes beyond the planning process.

7.52 I have considered the policy and BFC's representation carefully. On this basis I recommend that the policy is recast so that it takes a positive and more general format. In doing so I recommend that Map 4 which shows the BVC should be directly referenced in the policy. I also recommend that this map is revised so it shows the neighbourhood area. I also recommend that the opportunities in the second part of the policy are repositioned into the supporting text so that they would read as examples of how the second part of the policy would be implemented.

7.53 Otherwise I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Development proposals within the Blackwater Valley Corridor (as shown on Map 4) should respond positively to the importance and significance of its wildlife.**

**Proposals that would enhance the wildlife value of the Blackwater Valley Corridor will be supported’**

*At the end of paragraph 5.4.9 add:*

*‘The second part of Policy EN2 advises that proposals that would enhance the wildlife value of the Blackwater Valley Corridor will be supported. Examples of such proposals could include increasing the area of existing sites of high value, creating new habitats of interest, restoring degraded areas of land in ways that will maximise wildlife value and the formation of public access to local wildlife sites within the Blackwater Valley Corridor other than where such access would damage the wildlife interest.’*

*Revise Map 4 so that it shows the neighbourhood area.*

Policy NP/EN3 Memorial Park, Horseshoe Lake and Grove Lake recreation matters

- 7.54 This policy relates specifically to Memorial Park, Horseshoe Lake and Grove Lake. It comments that within the defined areas encouragement will be given to recreation uses that contribute to the conservation and enhancement of the rural/semi-rural character of the area. It also advises that the loss of any recreational facilities or land used for informal recreation within the defined areas will be resisted unless they can be replaced by equivalent or better provision; or an assessment has been undertaken to show that the open space, buildings or land to be surplus to requirements.
- 7.55 The policy also offers specific policy guidance for each area. In this context I am satisfied that it brings a distinctive approach beyond the more general approach taken in Policy LP44 of the BFLP.
- 7.56 BFC makes a series of helpful comments about the policy. I recommend that the policy is modified to addresses the issues that it raises. In reaching this conclusion I have taken account of STC’s responses to the clarification note. The modified policy will bring the clarity required by the NPPF in defining the areas included in the policy and using policy wording that is consistent with that used elsewhere in the Plan and which can be applied by BFC through the development management process. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Within the defined areas as shown on Maps 10, 11 and 16 recreation uses that contribute to the conservation and enhancement of the character of the area will be supported. The loss of any recreational facilities or land used for informal recreation within the defined areas will not be supported unless they are replaced by equivalent or better provision or an assessment has been**

undertaken to show that the open space, buildings or land to be surplus to requirements.

### **Memorial Park**

**Proposals for the use of land in Memorial Park (as shown on Map 11) for outdoor playing pitches and allotments will be supported where: -**

- they would not be detrimental to any features of landscape or conservation interest;
- any buildings and hard surfaces which are essential for the operation of the facility are proportionate in size and scale to their use; and
- appropriate levels of parking are available to avoid overspill parking causing detriment to neighbour amenity or the amenity of others of Memorial Park.

**Proposals for the installation of all-weather playing surfaces associated with sports use, within the flood plain area, will be supported.**

### **Horseshoe Lake**

**Proposals which enhance the use of Horseshoe Lake Park (as shown on Map 16) for sailing canoeing/associated recreation and related facilities within the Horseshoe Lake grounds will be supported where they respond positively to its features of landscape or conservation interest and do not conflict with the function of the SANG area.**

### **Grove Lake**

**Proposals which would enhance the use of Grove Lake Park (as shown on Map 10) as a nature reserve and for nature viewing purposes will be supported where they respond positively to the Lake's features of landscape or conservation interest.'**

### **Policy NP/EN4 Footpaths in the Blackwater Valley Corridor**

- 7.57 This policy relates to the enhancement of footpaths in the BVC. It comments that encouragement will be given to enhance the public footpaths included within the Sandhurst boundary that occur within the BVC. This would include the public footpath known as the 'Three Castles Path', where the path passes from Ambarrow Court/Ambarrow Hill and on to Horseshoe Lake.
- 7.58 The policy offers specific and locally-distinctive policy guidance on footpaths in the BVC. In this context I am satisfied that it is appropriate to feature as a policy in the Plan.
- 7.59 BFC makes a series of helpful comments about the policy. I recommend that the policy is modified to addresses the issues that it raises. In reaching this conclusion I have taken account of STC's responses to the clarification note. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Proposals to enhance the public footpaths included within the section of the Blackwater Valley Corridor within the neighbourhood area will be supported, including the public footpath known as the ‘Three Castles Path’, where the path passes from Ambarrow Court/Ambarrow Hill and on to Horseshoe Lake.**

**Proposals to remove public footpaths in the Blackwater Valley Corridor and/or to restrict their use or attractiveness will not be supported.**

**Proposals for the creation of additional public footpaths on or near the northern River Blackwater bank within the neighbourhood area will be supported.’**

Policy NP/EN5 Local Green Space

- 7.60 The policy proposes the designation of a package of local green spaces (LGSs). The proposed approach towards the designations is helpfully underpinned by the details in Appendix 4.
- 7.61 I looked at the proposed LGS carefully during the visit. I saw the significance of Snaprails Park (LGS1) and Owlsmoor Park (LGS2). Based on all the evidence and my observations during the visit I am satisfied that proposed LGSs 1-5 and 8-10 meet the criteria in paragraphs 106 and 107 of the NPPF.
- 7.62 Proposed LGS6 Horseshoe Lake and surrounding countryside (29 hectares) and LGS7 Grove Lake and surrounding countryside (15 hectares) are substantially larger than the other proposed LGSs. Their proposed designation has attracted objections from BFC and Bloor Homes based on their size.
- 7.63 In its response to the clarification note STC commented extensively on the local and strategic importance of the two proposed LGSs. For clarity, based on all the evidence and my own observations during the visit I am satisfied that both of the proposed LGSs are in reasonably close proximity to the communities that they serve (NPPF 107a) and are demonstrably special to a local community and holds a particular local significance (NPPF 107b). I have also taken note of the level of local support for the designation of these two LGSs.
- 7.64 I have considered carefully STC’s comments about the size of the two proposed LGSs and the extent to which they are local in character and not extensive tracts of land (NPPF 107c). Based on all the evidence I have concluded that both of the proposed LGSs are extensive tracts of land. Whilst I note STC’s comments about their strategic significance and their overlap with the wider intention of Finchampstead Parish Council such matters do not negate the need for proposed LGS designations to comply with the ‘local in character’ assessment in the NPPF. In these circumstances I recommend their deletion from the Plan, from the supporting text and from the associated map.
- 7.65 The policy lists the proposed LGSs and relies on the application of the matter-of-fact approach taken in paragraph 108 of the NPPF. Nevertheless, I recommend that it is expanded so that it clarifies that the national approach to LGSs will be applied to those defined locally.

- 7.66 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘The following areas as shown on the Inset Maps in Section 12, are designated as Local Green Spaces.**

**Underneath the list of local green spaces add: ‘Development proposals within the identified Local Green Spaces will be assessed in accordance with relevant national planning policy and will only be supported in very special circumstances.’**

**Delete LGS6 and LGS7 from the policy**

*Delete LGS6 and LGS7 from the details in paragraph 5.5.3 and 5.5.7*

*Delete LGS6 and LGS7 from Map 6*

Policy NP/T1 Traffic Congestion

- 7.67 The Plan comments helpfully about the objectives for the traffic related policies (NP/T1-T4). They are not to increase traffic usage of the Yorktown Road (between Rackstraw Road and the Crowthorne Road), or any other major roads within Sandhurst, such that it would cause significant congestion of those roads, and to promote safe pedestrian and cycle access routes.
- 7.68 This policy advises that where major developments could lead to an increase in traffic usage of Yorktown Road, or any other major roads in Sandhurst, Transport Statements or Transport Assessments for an applicable proposed development will be required to demonstrate, including any necessary mitigation, that there is no severe transport impact. The supporting text comments that the policy sets out to enhance and support the requirements of BFLP LP60 (Assessing transport impacts and requirements).
- 7.69 BFC, Bloor Homes and Beechcroft Developments comment about the extent to which the policy brings any added local value to national and local planning policies. In its response to the clarification note STC comments that:
- ‘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.’*
- 7.70 I have considered this matter carefully alongside the representations. I looked at the traffic volumes in Yorktown Road during the visit. On the balance of the evidence, I am satisfied that the policy brings a degree of local distinctiveness in relation to traffic levels on Yorktown Road. In this context I recommend that the policy is recast so that it brings the clarity required by the NPPF and can be applied by BFC through the

development plan process. This includes the incorporation of the approach taken in paragraph 116 of the NPPF.

- 7.71 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Major developments that would lead to an increase in traffic usage of Yorktown Road, or any other major roads in Sandhurst, should be accompanied by a proportionate Transport Statement or Transport Assessment to address their impact on the local highways network.’**

**Development proposals will not be supported which would:**

- **have an unacceptable impact on highway safety; or**
- **where their residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.’**

Policy NP/T2 Safe pedestrian and cycle routes

- 7.72 This policy advises that all new medium and large developments should provide safe pedestrian and cycle access to link up with existing footpaths and cycle routes, where such routes do not encourage increased access to the Thames Basin Heath SPA.
- 7.73 In general terms, the policy takes a positive approach which has regard to Sections 5 and 8 of the NPPF.
- 7.74 I have noted the representations made by BFC and Beechcroft Developments Limited on the thresholds used in the policy. In this context I recommend that the supporting text is expanded to provide appropriate definitions to bring the clarity required by the NPPF. I also recommend that the policy is modified so that acknowledges that the approach may not always be practicable (based on the location of the site concerned and/or its relationship to the existing footpath/cycle networks).
- 7.75 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Wherever practicable, medium and large developments should provide safe pedestrian and cycle access which connect with existing footpaths and cycle routes. Any such routes should be designed and located to avoid increased access to the Thames Basin Heaths Special Protection Area.’**

*At the end of paragraph 6.1.10 add: ‘For the purposes of Policy NP/T2 medium sites are those under 1 ha, with 5 or more dwellings and large sites are those 1 ha and over.’*

## Policy NP/T3 Residential Parking

- 7.76 This policy sets out specific parking standards in the neighbourhood area. They are higher than those which apply elsewhere in the Borough.

- 7.77 BFC comment that:

*'In setting a higher standard for parking in Sandhurst than elsewhere in the borough, Policy NP/T3 does not have regard to NPPF para. 112. Sandhurst is predominantly more urban and accessible compared to many other areas of Bracknell Forest outside Bracknell town itself. Indeed, there are several regular bus routes and a halt train station (as evidenced in Appendix 1).*

*While the Neighbourhood Plan is at pains to highlight high car ownership and usage, alternative options are available and policies to encourage sustainable transport options should be promoted ahead of simply increasing parking requirements. By having a higher parking standard than required by the BFC Parking Standards SPD for 3-and 4-bedroom properties, the policy would appear to actually promote the use of the private car over sustainable alternatives. This is contrary to NPPF paras. 109 e) and 111 b) & d), and para. 112 a) (which requires consideration of the accessibility of the development).*

*Further, there is no background paper or robust up-to-date evidence to justify establishing separate higher parking standards for smaller residential schemes. For example, no survey has been undertaken of recent developments to determine if these have resulted in increased parking issues in and around the area in which they are located, or evaluation of transport assessments etc. The justification appears to primarily be based on resident survey responses and selective Census data. Therefore, the evidence does not justify a Sandhurst specific departure from the borough-wide Parking Standards SPD.'*

- 7.78 In its response to the clarification note, STC commented that:

*'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.*

*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).*

*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.'*

- 7.79 I noted the levels of on-street car parking during the visit. However, on the balance of the evidence I am not persuaded that the policy meets the basic conditions. I have reached this conclusion for a series of reasons. The first is that the approach is based on responses to questionnaires rather than detailed evidence. The second is that the policy does not make a compelling case that the application of BFC's car parking policies (as set out in the borough-wide Parking Standards SPD) will not adequately address the car parking requirements of new developments. The third is that STC has not addressed the extent to which the higher parking standards proposed in the policy would directly address and/or improve the existing parking issues in the neighbourhood area. This acknowledges that it is not the role of new developments to resolve existing parking/traffic issues. The fourth is that the policy approach takes no account of its potential effects on the commercial viability of residential development.
- 7.80 In these circumstances I recommend the deletion of the policy and the relevant supporting text.

### **Delete the policy**

*Delete Sections 6.2 and 6.3.*

Policy NP/T4 Sustainable Transport

- 7.81 This policy seeks to enhance accessibility to the railway station and improving regular bus services generally in the neighbourhood area. I saw the importance of the Station during the visit. The first part of the policy is land-use related. The second part of the policy reads as a general aspiration rather than as a land-use matter. As such I recommend that it is incorporated into a slightly modified supporting text. STC agreed with this approach in its response to the clarification note.
- 7.82 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

### **Replace the policy with: 'Proposals to improve pedestrian access to Sandhurst Railway Station will be supported.'**

*Replace paragraph 6.7.4 with: 'Support will be given to improving regular bus services within Sandhurst providing such routes are deemed to be safe. Guidance in respect of determining a safe regular bus route should respond positively to the Chartered Institution of Highways and Transport publication 'Buses in Urban Developments' (January 2018) document, or any updated edition.'*

Policy NP/C1 Community Facilities

- 7.83 This policy sets out the Plan's approach towards community facilities. In general terms it takes a positive approach and has regard to Section 8 of the NPPF.

7.84 BFC make a series of comments on the precision of the wording used in the policy. I have considered the comments alongside STC's responses. In this context I recommend that:

- the wording used in the first two parts is simplified and refers to the need for development proposals to respond positively to the amenities of residential properties in the immediate locality;
- the deletion of the third part of the policy and its repositioning into the supporting text. This acknowledges that it raises a management issue rather than a land use matter;
- the simplification of the fourth part of the policy; and
- the deletion of the fifth and sixth parts of the policy as they cut across the requirements for protected sites (in this case the Thames Basin Heaths SPA) and do not have the clarity required by the NPPF.

7.85 I also recommend consequential modifications to the supporting text. This includes the deletion of paragraph 7.7.3 (on hot food take aways) which has no direct relationship with this policy.

7.86 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**'Proposals for additional indoor and outdoor sports pitches and play areas, will be supported where they respond positively to the amenities of residential properties in the immediate locality.'**

**New community facility proposals should demonstrate that they respond positively to the amenities of residential properties in the immediate locality.**

**Proposals that involve the loss of car parking associated with community facilities will not be supported unless alternative provision is provided which does not lead to an increase in publicly available car parking spaces within 400m of the Thames Basin Heaths Special Protection Area'.**

*Add a new paragraph of supporting text to read:*

*'7.2.6 Schools will be encouraged to allow community access to supplement existing sports facilities.'*

*Delete paraps 7.7.3/7.7.6/7.7.7/7.7.9/7.7.10 and Maps 12 and 13.*

**Policy NP/C2 Public Houses and Social Clubs**

7.87 This policy seeks to safeguard public houses and social clubs. It also offers support for proposals which would enhance the use/community value of such uses. In general terms it takes a positive approach and has regard to Section 8 of the NPPF.

7.88 BFC make a series of comments about the extent to which the submitted policy overlaps with the relevant policies in the adopted BFLP.

- 7.89 I have considered this matter very carefully. On the balance of the evidence, I recommend that it is recast so that its order is reversed and the positive element appears first. I am satisfied that the approach towards proposals for the change of use or redevelopment of public houses and social clubs is locally-distinctive. BFLP Policy 44 defines the facilities to be safeguarded, and the supporting text (at paragraph 7.8.4) comments about how the marketing of facilities should proceed. I recommend that the supported text is expanded to address the former matter.
- 7.90 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Proposals that would enhance the use and community value of public houses and social clubs will be supported.**

**Proposals for the change of use or redevelopment of public houses and social clubs will not be supported unless there is evidence that the public house or social club is not viable. To demonstrate that the public house or social club is not viable, a robust assessment should be carried out. This assessment should evaluate the quantity and quality of the existing facilities in the locality and assess their value to the community and should include evidence that:**

**Add a) to c) from the first part of the policy, including ‘and’ after a), so that it is clear that development proposals will need to comply with each of the three criteria).’**

*Replace paragraph 7.8.4 with:*

*For clarity, the relevant community facilities are defined within the first section of BFLP Section 14 (paragraph 14.1 page 242). The definition of ‘economically viable’ (when related to policy NP/ C2, item c) is defined as ‘has the ability to generate sufficient income to cover operating costs, pay debts, and remain self-sufficient in the long term.’*

Policy NP/C3 Potential Community Infrastructure Levy and/or Section 106 Agreements

- 7.91 This policy is a schedule of potential community benefits that may arise from new development.
- 7.92 In this context I sought comments from STC about the extent to which the policy should be more simply captured in the supporting text. In its response STC commented that matters associated with St Michaels and All Angels Church are definitive, whereas items 2 to 5 are general objectives. Both are linked to matters that could be included within planning conditions that could relate to appropriately sized developments.
- 7.93 I have considered this matter carefully. Whilst STC’s approach is well-intentioned, the policy is a list of potential community benefits that may arise from development proposals rather than a land use policy. In these circumstances I recommend that the policy is deleted, and that the list is consolidated with the supporting text.

### Delete the policy

Add a new paragraph of supporting text to read:

*8.3.5 Where the relationship between a development proposal and community benefits meets the national tests for developer contributions the Town Council will support the delivery of the following community benefits:*

- *The incorporation of additional parking and surfacing to provide improved parking/pick up and dropping off areas associated with St Michael and All Angels Church and St Michael's School in Lower Church Road would be supported. Such improvements to be incorporated to retain the semi-rural street scene;*
- *The improvement of footpaths within Lower Church Road, between the A321 and Mill Lane/Lower Sandhurst Road;*
- *The delivery of storage facilities for youth equipment usage at appropriate Council buildings, or other centres where a demand can be demonstrated;*
- *The inclusion of a cycleway to linkup the current cycleways between Yorktown Road and Crowthorne Road; and*
- *The improvement and, where practicable, an increase in parking provision within or nearby to the retail centres in Sandhurst, where such provision does not encourage additional access to the Thames Basin Heaths SPA.'*

### Policy NP/C4 Upgrading of Unadopted Roads

- 7.94 This policy seeks to upgrade unadopted roads. In this context I have concluded that it should be in the supporting text rather than being presented as a policy both generally and as unadopted roads are not controlled by planning related legislation. STC agreed to this approach in its response to the clarification note.
- 7.95 Otherwise I am satisfied that the supporting text should remain in the Plan as it addresses an important local issue.

### Delete the policy

Replace paragraph 8.4.1 with:

*'There are many unadopted residential roads in the neighbourhood area. In most cases these roads are uneven and constructed of varying grades of hardcore and aggregate. The situation is summarised in NP Appendix 1, the Statistics and Supporting Information document, section 2, para 2.6.6. As these are private roads, they are not able to be considered for improvement via any CIL contribution. However, the Town Council is keen that these roads are improved with a satisfactory hard, albeit pervious surface and where applicable a suitable sustainable drainage system. This action, in addition to improving the appearance of the Town, would contribute to easier access for public service vehicles (refuse collection, emergency services etc.). If a future potential development were to be submitted for a site on an unadopted road it would be subject to all related development plan policies, these may include satisfying all parking and environmental matters.'*

*Delete paragraph 8.4.2*

## Policy NP/ERB 1 Retail

- 7.96 This is a wide-ranging policy. The Plan comments that its objectives are:
- to maintain the current number of retail units within the settlement of Sandhurst;
  - to encourage redevelopment of existing retail units of low architectural quality.
  - to support business facilities that are located within the designated employment area; and
  - to discourage the provision of more hot food takeaway outlets, unless it can be demonstrated that reasonable measures have been instigated in an attempt to retain the current retail or commercial usage and adequate carparking provision can be made and road safety is not compromised.
- 7.97 BFC makes a series of detailed comments about the contents of the policy. I have considered them carefully alongside STC's responses to the clarification note.
- 7.98 The initial elements of the policy are unclear and general, and do not have the clarity required by the NPPF. In this context I recommend that they are deleted and that the policy focuses on hot food take aways.
- 7.99 As BFC comments, paragraph 97 of the NPPF sets out national approach to such uses. In this context I recommend that the policy is recast so that it sets out the requirements that would need to be met for a hot food take away to be supported. This is a more measured approach than that set out in the submitted policy. The recommended recast policy includes the two matters addressed in the submitted policy, an additional issue on amenity and the two matters addressed in the NPPF (proximity to schools and adverse impact on local health, pollution or anti-social-behaviour).
- 7.100 I also recommend that the supporting text is expanded to provide proportionate information about the marketing requirements (criterion a) in the modified policy.
- 7.101 Finally I recommend that the objectives associated with the policy are modified to reflect the sharper focus of the policy. I also recommend that the policy title is amended accordingly.
- 7.102 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**Replace the policy with:****'Hot Food Take Aways****'Proposals for change of use from current residential, retail or commercial to hot food takeaway outlets will only be supported where:**

- **it has been demonstrated that a vacancy exists in the property concerned following genuine and reasonable attempts to let, lease or sell the related property for its current use;**

- adequate parking provision is made for the proposed use, and the proposal can be safely accommodated in the local highways network;
- the proposal does not unacceptably detract from the amenities of residential properties in the immediate locality;
- the proposal is not within walking distance of schools and other places where children and young people congregate; and
- the proposal is not in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social behaviour.'

*Replace the Objectives box immediately prior to the policy with:*

*'To maintain the current number of retail units within the settlement of Sandhurst.*

*To discourage the provision of more Hot Food Takeaway outlets, unless it can be demonstrated that reasonable measures have been instigated in an attempt to retain the current retail or commercial usage and adequate carparking provision can be made and road safety is not compromised.'*

*Add a new paragraph of supporting text to read: 'The first criterion of Policy NP/ERB1 requires that a residential, retail or commercial property is marketed as part of any proposal to change its use to a hot food takeaway outlet. In this context a property should be actively marketed for six months for sale or letting at a realistic commercial rate to acknowledge its permitted use and condition and with evidence that no reasonable offers have been received. The second criterion requires that the proposal can be safely accommodated in the local highways network. Based on the location of the site concerned a traffic assessment may need to be prepared by the applicant to satisfy this matter.'*

#### Policy NP/ECC 1 Energy Savings

- 7.103 The Plan comments that the objectives of the policy are to support the intentions of the NPPF and the Local Plan by encouraging local initiatives to minimise greenhouse gas emissions, and to encourage renewable energy sources.
- 7.104 On the one hand, the policy achieves these objectives. However, on the other hand, it brings no locally distinctive elements to either national or local planning policies. As such I recommend the deletion of the policy and the supporting text.

#### **Delete the policy**

*Delete paragraphs 10.1.1 to 10.1.3*

#### Policy NP/ECC 2 Heat Pumps

- 7.105 This policy has the same objectives as Policy NP/ECC1.
- 7.106 AS with Policy NP/ECC1, I have concluded that the policy brings no locally distinctive elements to either national or local planning policies. As such I recommend the deletion of the policy and the supporting text.

## Delete the policy

*Delete paragraphs 10.2.1 to 10.2.6*

Other matters - General

- 7.107 This report has recommended a series of modifications both to the policies and to the text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. It will be appropriate for BFC and STC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

*Modification of general text (where necessary) to achieve consistency with the modified policies*

Other Matters – Specific Comments

- 7.108 The representations from BFC raise a series of issues on a policy-by-policy basis. I have addressed them earlier in this report.
- 7.109 The representation also raises a series of more general issues. I recommend that the modifications to the following sections of the Plan are incorporated in accordance with the suggestions made by BFC in their representation (and using its referencing system) to ensure that it meets the basic conditions.
- Maps 1 and 2
  - Paragraph 3.3.5
  - Paragraph 8.2.1
  - Paragraph 9.2.2
  - Maps 7/8/10/11/12/13/14/17

## 8 Summary and Conclusions

### *Summary*

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2037. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community.
- 8.2 Following the independent examination of the Plan, I have concluded that the Sandhurst Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

### *Conclusion*

- 8.3 On the basis of the findings in this report I recommend to Bracknell Forest Council that subject to the incorporation of the modifications set out in this report the Sandhurst Neighbourhood Development Plan should proceed to referendum.

### *Referendum Area*

- 8.4 I am required to consider whether the referendum area should be extended beyond the designated neighbourhood area. In my view, that area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by Bracknell Forest Council on 12 January 2024.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth and efficient manner.

**Andrew Ashcroft**  
**Independent Examiner**  
**12 October 2026**