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Development Plan Team
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20 January 2016

Dear Sir or Madam

SANDHURST TOWN NEIGHBOURHOOD AREA DESIGNATION CONSULTATION

The Defence Infrastructure Organisation, on behalf of the Ministry of Defence (MOD) would like to comment on the above consultation. Whilst the MOD does not object to the principle of the designation of a neighbourhood area within Sandhurst parish, it does however wish to object to this area including land within MOD ownership.

Given that approximately 38% of the proposed Neighbourhood Area is within MOD ownership it is disappointing that it appears that no approach has been made by the Town Council to discuss these proposals with the MOD and it is understood that there is no MOD representation on the Steering Group to ensure that National Defence interests are adequately taken into account. This latter point emphasises the fundamental difference between land within MOD ownership and other parts of the parish.

Sandhurst Parish includes land encompassing the Royal Military Academy Sandhurst (RMAS) and the associated Barossa Training Area (BTA). RMAS has both national and international importance and is widely recognised as a world class institution which produces Army officers of the highest calibre. The RMAS and BTA sites are both operational Crown land, the primary purpose of which is linked to Defence training. Whilst the MOD is required to act in accordance with and take into

account the requirements of planning legislation, ultimately it is operational Defence requirements that dictate the use and development of this land.

A neighbourhood plan, by its nature has a very local focus. Paragraph 003 of the national Planning Practice Guidance states that neighbourhood planning:

- *“...enables communities to play a much stronger role in shaping the areas in which they live and work and in supporting new development proposals...”* and
- *“...provides the opportunities for communities to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see...”*

There is conflict here between the purpose of neighbourhood plans and the national Defence role of land within MOD ownership (and within the case of RMAS also an international role). Whilst it is acknowledged that Defence establishments contribute towards and are part of local communities, in practice it will be difficult for the aims of the neighbourhood plan as set out above to be delivered for land on which use and development is driven by national Defence requirements.

Furthermore, given the national (and international) importance that can be afforded to development proposals at RMAS and BTA, there is concern that policies within a future neighbourhood plan (which would be subject to significantly less scrutiny and requirement for an appropriate evidence base than policies within a Local Plan / Core Strategy) could have the potential to adversely impact on Defence interests.

Within the letter that supports the application for the designation of the neighbourhood area, the Town Council states that:

“The community wishes to influence future development within the proposed area to ensure it is appropriately integrated with and complementary to existing infrastructure and the natural environment”.

It is considered that the “community” already has the opportunity to influence proposals through the existing planning regime and that the issues highlighted within this sentence are already considered within national and local planning policy and as part of the development management process. Coupled with the issues highlighted above it is not considered that the information in the Town

Council's letter provides sufficient justification to include MOD land within the proposed neighbourhood plan area.

Notwithstanding the issues raised above, it should also be noted that there is an explosive safeguarding consultation zone in place for RMAS Sandhurst. The area falling outside land within MOD ownership but within the purple line (as shown on the attached safeguarding plan) falls within the Vulnerable Building Distance. Within this zone all buildings should be deemed as being "non vulnerable", that is of robust design and construction so that should an explosion occur at the MOD storage facility, buildings nearby will not collapse or sustain damage that could cause critical injury to the occupants. Therefore it should be noted that any future proposals or policies coming forward through the neighbourhood plan that could relate to this area should be referred to the DIO Safeguarding team for review.

To summarise the MOD objects to the inclusion of MOD land within the neighbourhood plan area and respectfully asks that Bracknell Forest Council remove all MOD land within the parish (as shown on the attached ownership plan) from the proposed area before formally designating the neighbourhood plan area. For the reasons set out above it is considered that it is not appropriate to include MOD land within the neighbourhood plan area. Indeed, the inclusion of such land and requiring it to be subjected to neighbourhood plan policies has the potential to adversely affect Defence interests. The removal of such land would not isolate any of the remaining land within the parish nor result in a fragmented neighbourhood area. Indeed, the remaining area would be coherent and still be able to function effectively as a neighbourhood plan area.

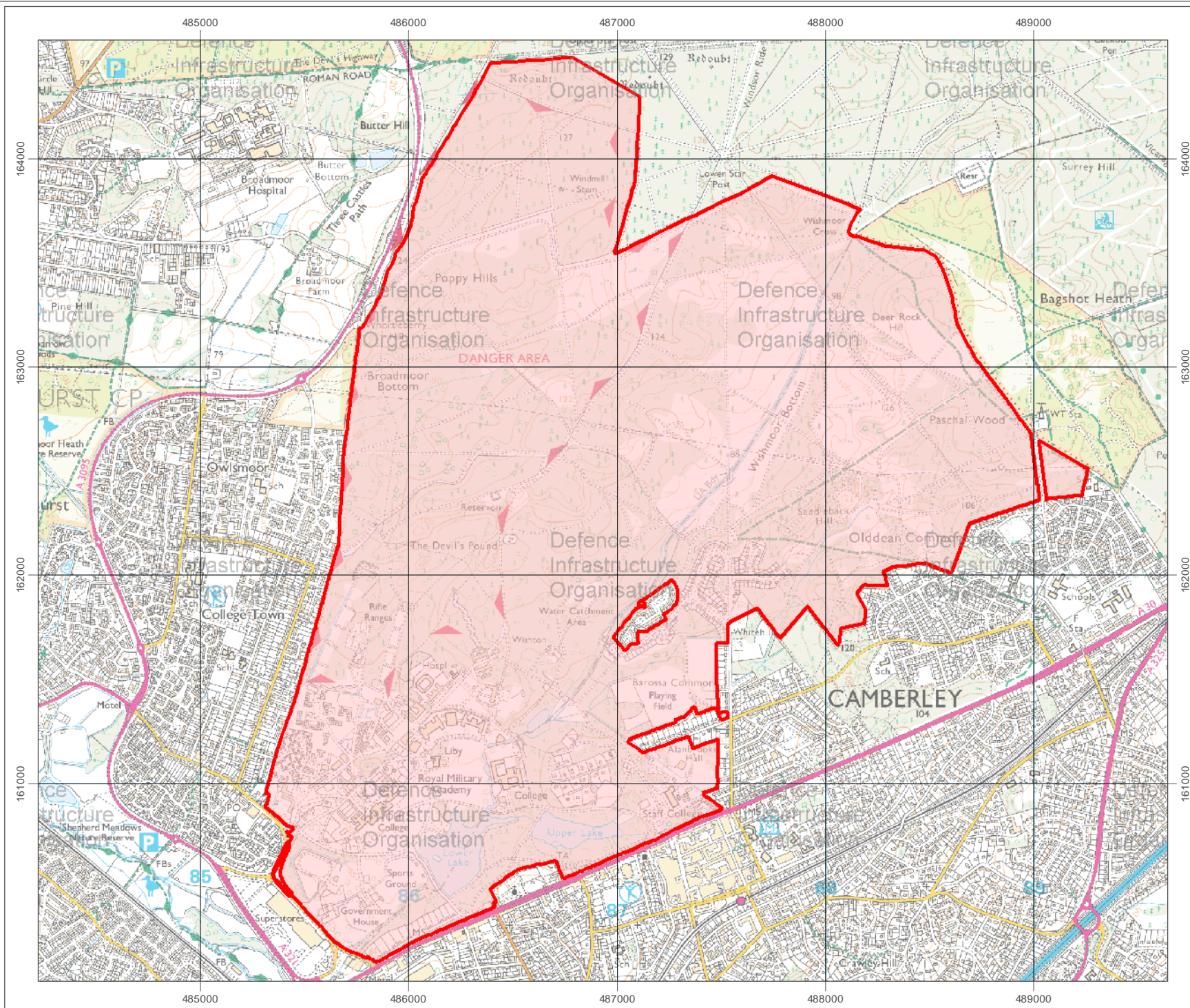
I look forward to hearing from you in due course and would request that the MOD is directly informed either by Bracknell Forest Council or Sandhurst Parish Council about future consultation periods relating to the Neighbourhood Plan.

Yours faithfully

Signed on email

Jodie McCabe BSc (Hons) MA MRTPI
Senior Town Planner, Environment & Planning Support

Encs: MOD Land Ownership Plan
MOD Safeguarded Land Plan



**Defence
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**RMA SANDHURST
SURREY**

Land within MOD Ownership

KEY

 MOD Boundary

Scale 1:25,000

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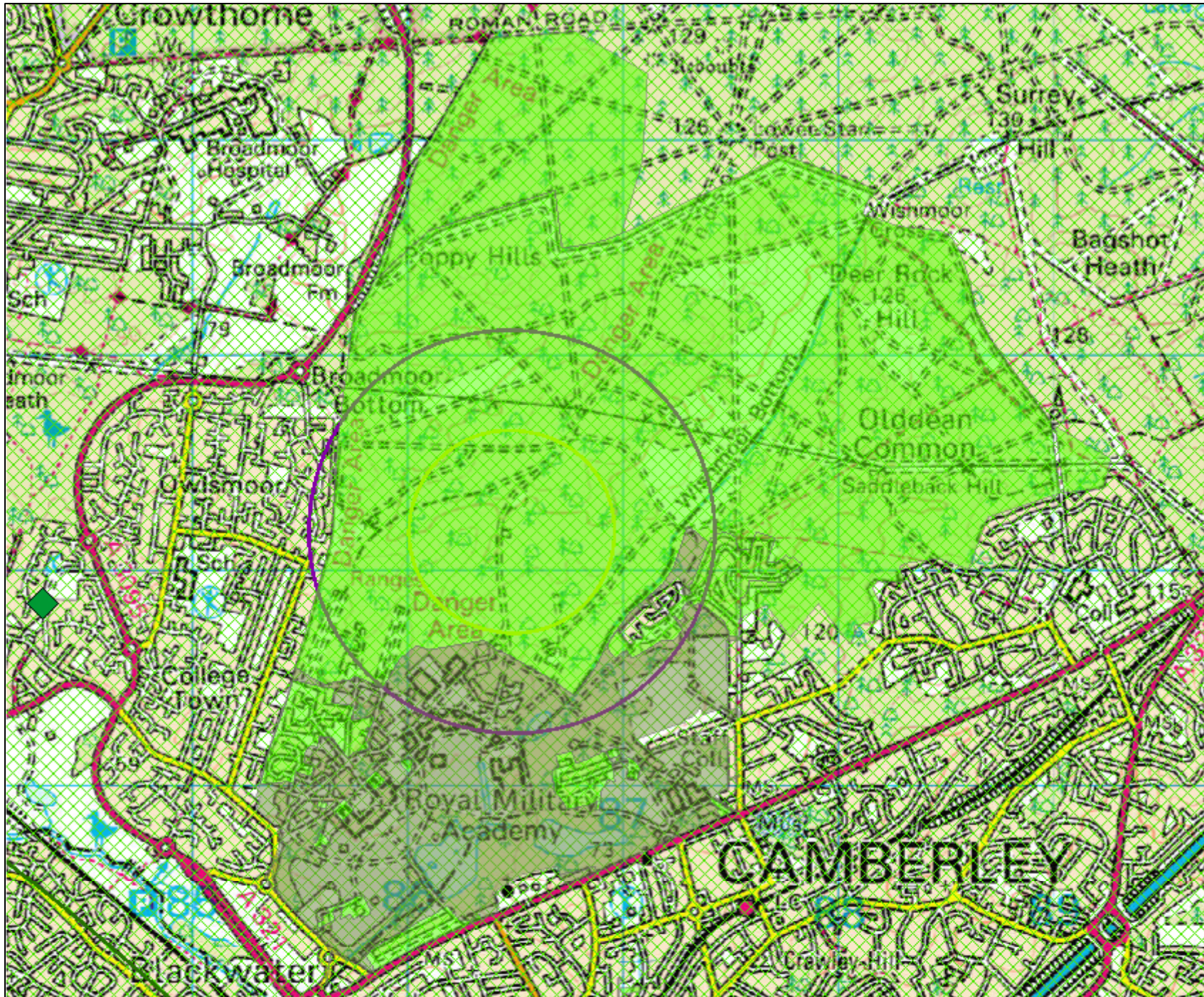
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Map reference:
01611_RMA SANDHURST

Version Number:
001
Production Date:
12th January 2016
Drawn By:
DIO Data-1a1b Geo Ops Analyst
Checked By:
DIO SEE-EPSTCP1

**GEOSPATIAL SERVICES
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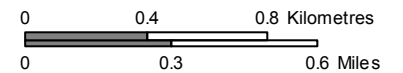
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Defence Infrastructure Organisation

Name :

Date : 13th January 2016



Map Centre Coordinates:
486,940 162,314

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