



## Growth and Communities

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**BY EMAIL ONLY**

Wednesday 28 May 2025

Dear Sir, Madam

### **Re: Sandhurst Neighbourhood Plan (2024-2038) - Regulation 16 Consultation**

Thank you for consulting Kent County Council (hereafter referred to as the County Council) on the Sandhurst Neighbourhood Development Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

### **Chapter 8: Environment and Green Space**

*Policy S7: Green and blue infrastructure and delivering biodiversity net gain*

#### Sustainable Urban Drainage Systems (SuDS):

The County Council, as Lead Local Flood Authority, recommends that Policy S7 could be strengthened to consider the use of SuDS as outlined in section 14 of the National Planning Policy Framework (NPPF) for new development proposals. The multiple benefits SuDS can provide, including additional amenity and biodiversity benefits, are well documented and would align with this section of the Neighbourhood Plan, which seeks to ensure the multiple benefits of Sandhurst's green and blue spaces.

### **Chapter 9: Transport and Movement**

*Policy S11: Improving safe movement and promoting active modes of travel*

#### Public Rights of Way (PRoW):

The County Council is keen to ensure that its interests are represented within the local policy frameworks of the Parishes in Kent. The reference to the Rights of Way Improvement Plan (ROWIP) in the Neighbourhood Plan is welcomed. However, the ROWIP is noted as being under KCC Highways (paragraph 9.4), when it is prepared by the PRow and Access Service who is the Highway Authority for PRow. The PRow and Access Service would ask that this paragraph be amended to reflect this.

The County Council considers the inclusion of ROWIP as an opportunity to enable a successful partnership to deliver improvements to the PRow network in Sandhurst.

## **General Commentary**

### Waste Management:

The County Council, as Waste Disposal Authority for Kent, has a statutory duty to provide Household Waste Recycling Centres (HWRCs) and Waste Transfer Stations (WTSs) with sufficient capacity to accept arisings from across the county. Tunbridge Wells Borough Council (TWBC) is the Waste Collection Authority for this area with responsibility for kerbside collection.

The County Council notes that Tunbridge Wells North Farm HWRC and WTS are already reaching capacity. Mitigation at this site or provision for a new site to provide the required capacity is likely to be needed to facilitate increased demand in the area.

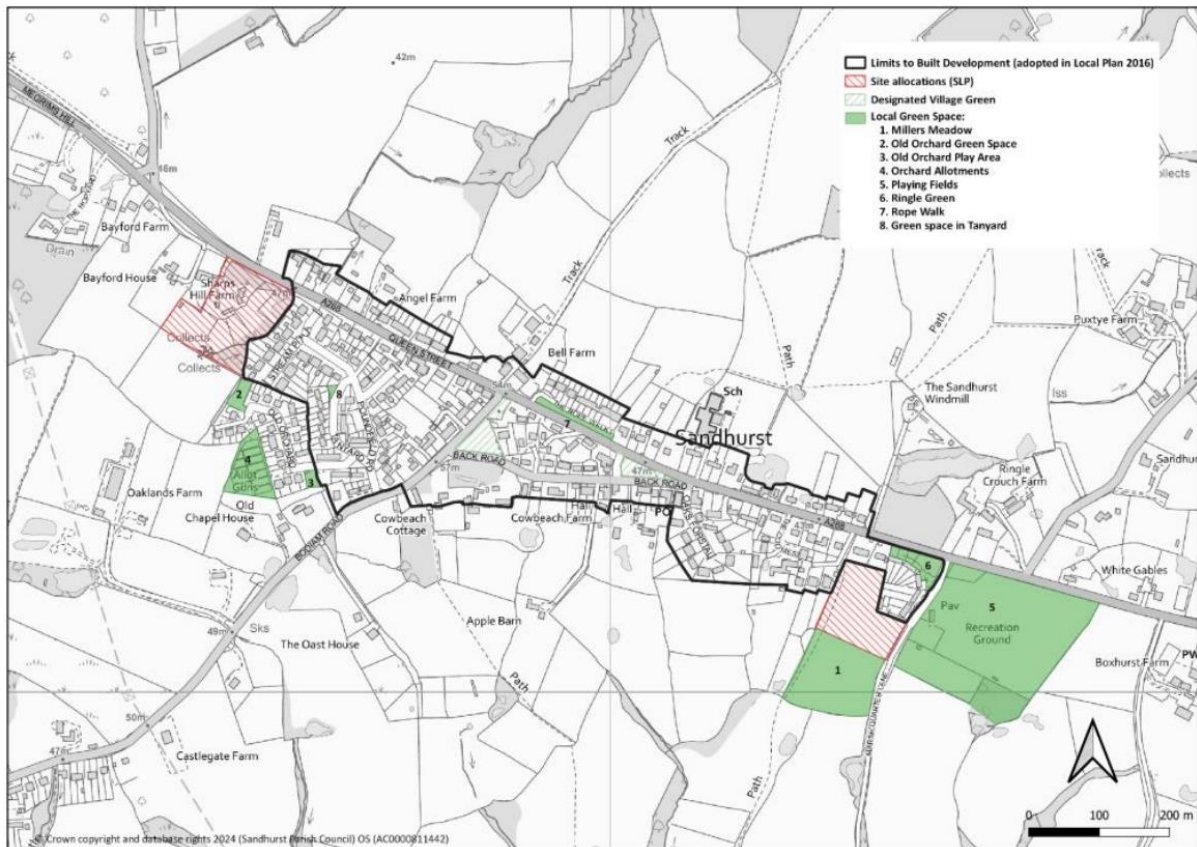
While the Sandhurst Neighbourhood Development Plan does not identify a housing figure to be delivered through the SNDP itself, it sets out parameters to support TWBC proposed growth strategy. The County Council has responded to the Local Plan and is pleased to see that waste is included in the types of infrastructure to be delivered.

### Minerals and Waste:

The County Council, as Minerals and Planning Authority, confirms that within the plan area, there are no safeguarded waste management facilities.

With regards to safeguarded minerals, there are safeguarded sandstones (of various types) and some Sub-Alluvial River Terrace Deposits (sands and gravels) to which the Neighbourhood Plan does not refer. One of the housing allocations within the emerging Tunbridge Wells Local Plan (hatched in red in the plan below reproduced from the Neighbourhood Plan) is coincident with a safeguarded mineral - the Tunbridge Wells Sand Formation.

As part of the Tunbridge Wells Local Plan process, the County Council concluded that the mineral safeguarding issues were not objectionable. Given the very extensive nature of the sandstone formations, which are met by two quarries operating in East Sussex and the economic market demands at this time which are low to non-existent, the County Council has no land-won mineral safeguarding concerns for the Neighbourhood Plan.



The County Council would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully

[Redacted signature]

**Stephanie Holt-Castle**  
Director – Growth and Communities