

TWBC comments on the Sandhurst Neighbourhood Development Plan 2024-2038 (Submission Version)

Page/paragraph number	Policy Details	TWBC Comments / Proposed Change
General comments		
Conformity references after policy boxes	Saved LP policies and Core Strategy policy references	It is noted that as set out below, it is expected that the new borough Local Plan will be adopted in summer 2025, well before the NDP is made if successful at referendum. Once adopted the Local Plan will supersede the saved Local Plan and Core Strategy and therefore reference to these policies will be out of date by the time the NDP is made (and possibly before its referendum stage). It is therefore considered that text referring to these documents needs further consideration / revision.
1. Introduction		
Para 1.6	Framework for monitoring and implementation	Suggest this includes review, so amend to read “monitoring, implementation and review” as review is mentioned further on in the NDP.
Para 1.8	Local Planning Policy	A new KMWLP has recently been adopted so the text will need updating. Suggested wording: <ul style="list-style-type: none"> Kent Minerals and Waste Local Plan 2024 to 2039 (adopted March 2025)
Para 1.10	Progress of borough Local Plan – further hearing sessions	This paragraph needs to be updated, as TWBC is now at the Main Modifications stage of the Local Plan Examination. Suggested text is: “Further hearing sessions will commence in relation to this. Stage 3 Hearing Sessions were held in 2024, and the Council has consulted on proposed Main Modifications to the Plan, with receipt of the Inspectors Final report expected in due course, followed by adoption of the Local Plan in summer 2025”.
Para 1.11	Local Development Scheme, October 2024	Requires an update as there is now an updated LDS dated March 2025 .
Para 1.13	Reference to Local Plan Review	Delete the word “partial” as TWBC has yet to determine the scope of the review.

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		It would also be advisable to use the annual housing figure (678) the emerging Local Plan is planning for to avoid complication around the figures from the start of the plan period (2020) and adoption (assumed 2025). The Local Plan Review will plan for the remaining five years of the SLP housing need figure of 678 per annum, as well as the difference between the 678 figure and the new housing need figure of 1,100 per annum (derived from the new standard method and the most recent housing affordability ratios released in March 2025).
Para 1.14	Sandhurst Local Plan Policies	TWBC have just concluded a consultation on proposed main modifications to the Local Plan and are available to view in this Schedule of Proposed Main Modifications . It would be worth checking the schedule to consider any changes to these policies.
Para 1.18	Table 1	Given TWBC's committee cycles (both pre and post NDP referendum), it is considered that the Sandhurst NDP is most likely to be 'made' (if successful at referendum) in early 2026. The NDP should consider updating this timeline for the NDP.
Para 1.21	Sustainability of the NDP	Delete the word "by" in first sentence.
2. About Sandhurst Parish		
Para 2.3	Limits to Built Development	It is suggested that the wording is amended to reflect the Limits to Built Development boundary is defined through the Tunbridge Wells Borough Local Plan, not the Neighbourhood Plan. The wording should also reflect that the LBD has recently been amended/will be amended depending on whether the emerging Local Plan has been adopted (which it should be) ahead of publicising the referendum version of the NDP.
Para 2.10	Issues and opportunities facing Sandhurst	<p>TWBC notes and agrees with the issues and opportunities identified here.</p> <p>The Climate Action Group set up by the Parish Council could seek advice from the Private Sector Housing Team at the Borough Council in regards to the identified challenge in retrofitting the existing housing stock.</p> <p>The Borough Council would also support the Parish Council in working and negotiating with the relevant</p>

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		agencies to seek improved wastewater/sewerage infrastructure investment and resilience.
4. Spatial Strategy		
Policy Box S1: Location of Development	Criterion B) iii	It is noted that as set out above, it is expected that the new borough Local Plan will be adopted in summer 2025, well before the NDP is made if successful at referendum. Once adopted the Local Plan will supersede the Core Strategy (and other documents) and therefore reference to Core Policy 6 will be out of date by the time the NDP is made (and possibly before its referendum stage). It is considered that this text therefore needs revision.
Para 4.4	Figures 2 and 3	Similar to the comment made relating to the LBD under section 2, consider the wording and illustration of the LBD on the figures depending on the status of the emerging Local Plan when producing the referendum version of the NDP.
5. Housing		
Policy S2	Criterion A) ii	It is noted the affordable housing tenure split, based on Housing Needs Study for the Parish, differs from the SLP as it proposes 50/50 split between affordable home ownership and social and affordable rent. SLP Policy H 3 has a split 40% intermediate tenures or affordable routes to home ownership and 60% social rent. However, Policy H 3 is 'subject to consideration of any subsequent local policy and/or evidence'.
Policy S2	Table 2	<p>The indicative tenure mix at Table 2 specifies that 25% of affordable housing be provided as First Homes. Whilst noting that the housing needs study identified first time buyers and smaller/younger households as being in need in the Parish, it is no longer a requirement that 25% of affordable housing on sites be provided as First Homes. Given our track record and the £250k cap on house prices for first homes, there may be difficulties delivering these and it may cause issues with registered providers taking on affordable housing schemes in Sandhurst.</p> <p>Although not precluded, given the affordability difficulties in the parish, the NDP may want to absorb this 25% into other forms of low cost home ownership such as shared ownership. This may also help improve the willingness of registered providers to take on affordable housing schemes in the Parish.</p>

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Paras 5.3 and 5.7		These paragraphs reference a housing survey of local residents. Was this the 2014 one or a more recent survey?
Para 5.5		It is noted that a future review of the Neighbourhood Plan would consider a site allocation to address the affordable housing shortfall.
Table 3	Suggested Dwelling Size Mix to 2038	Whilst it is noted that the Parish has a predominance of three bed houses, the % of 4 beds for any new development seems high at 18.3% given the affordability problems in the Parish.
6. Character, Heritage and Design		
General		It is good that the concerns raised around the design policies and design guidance at the Regulation 14 consultation have largely been addressed. The comments in this table for this section predominantly seek to improve the wording or fix grammatical errors.
Policy S3: Character and Design of development	Policy name	Decapitalise design for consistency with the naming of other policies
Para 6.1		Delete the “.” in “Local Plan policies. which require....”
Policy S3: Character and Design of Development	Criterion B) vii	Add ‘and’ before “pedestrian safety”.
Para 6.2	Justification	Instead of “characterful buildings” put “buildings of character”.
Para 6.5		<p>“It focusses policies on three core considerations: respecting the setting of the High Weald, incorporating sympathetic placemaking principles next; encouraging detail design built in towards the end.”</p> <p>Not sure this last sentence makes grammatical sense.</p>
Para 6.7		<p>“[...] well-integrated with the existing settlements”.</p> <p>Use within rather than with.</p>

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Para 6.8		“The Design Guidance identifies six character areas in the parish, areas, each with their own [...]”. Put “each area with their own”.
Para 6.9	The Guidance	Add ‘s’ to “the Guidance provide...”
Para 6.10	“Development should take account of both policies”	It is suggested that this text is deleted, since these are not the only applicable policies.
Para 6.11		“This will help to mitigate against climate change”. Change this to “this will help mitigate the effects of climate change”.
Policy Box S4: Energy Efficiency and Design	Criterion C	‘They should’ is currently in blue with a hyperlink continued from the sentence before.
Policy Box S4: Energy Efficiency and Design	Criterion B) iii	A fabric first approach should be desirable and required in the first instance
Para 6.12		Comma after “On 12 June 2019”.
Para 6.16		<p>Capitalise the first “local plan”</p> <p>“[...] carbon dioxide emissions reductions”. Delete ‘s’ from emissions.</p> <p>“[...] and more sustainable energy sources”. Put “to use more sustainable energy sources”.</p> <p>The second sentence in this paragraph is quite long and could be split up.</p>
Para 6.18		<p>“The design of developments should seek to ensure that surface water is appropriately managed, as close to source as possible. In terms of future flood risk, better rainwater management through SuDS is the preferred approach to avoid placing added pressure on drainage networks during heavy rainfall. The SNDP strongly supports the requirement to include SuDS within all development.”</p> <p>Consider putting this section of the last bullet point as its own paragraph.</p>
Para 6.22		“In the absence of the Appraisal”. Put “In the absence of an appraisal”.

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Para 6.23		“There are 96 individual/groups of buildings and assets”. Put “There are 96 individual/groups of heritage assets”.
Para 6.25		<p>“There are many other heritage assets, however, that contribute to the historic local context and story of the parish, but which are not nationally important enough to be included on the statutory List of Buildings of Special Architectural or Historic Interest compiled by the Government.”</p> <p>Put “There are, however, many other assets that contribute to the historic local context and story of the parish that are locally important but not of national importance.”</p>
Para 6.29		<p>Hyperlink to referenced TWBC Historic Farmstead Guidance.</p> <p>“Finally, there are several farmsteads and oasthouses in Sandhurst Parish, typical in this part of Kent”. Put “Finally, there are several farmsteads and oasthouses in Sandhurst Parish which are typical in this part of Kent.”</p>
Para 6.31		The comments on non-designated heritage assets are noted and will be added to the local list.
Para 6.32		<p>Hyperlink to the referenced Historic England annual Register of Heritage at Risk.</p> <p>“[...] to inform the TWBC work”. Put “to inform TWBC’s work”.</p>
7. Employment in Sandhurst		
Para 7.3	Reference to TWBC’s Validation Checklist requirements	Change the last sentence to say – TWBC will assess such impacts and each case on its merits having regard to its planning application validation checklist requirements (such as the requirement to submit landscape and visual impact assessments, heritage statements, ecological surveys etc.) and relevant development plan policies.
8. Environment and Green Space		
Policy Box S7: Green and Blue Infrastructure and	Criterion A	Suggest amending the wording for consistency and to better conform with national policy:

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Delivering Biodiversity Net Gain		“with the aim of delivering and provide a measurable biodiversity net gain at least 10%. Proposals that deliver in excess of this will be <u>supported</u> . considered favourably .
Policy Box S7: Green and Blue Infrastructure and Delivering Biodiversity Net Gain	Criterion D) Trees and woodland: i	Consider rewording the first sentence (‘There is no unacceptable loss of...’), to avoid using a double negative and improve the clarity. This could be reworded to: ‘Development proposals should demonstrate’ ... ‘Any of loss of, or damage to, existing trees or woodlands during or as a result of development is justified and acceptable. ...’
Policy Box S7: Green and Blue Infrastructure and Delivering Biodiversity Net Gain	Criterion D) Fauna vi	Suggest reframing this as per v and vii with wording such as: “Provision of bird and bat nesting boxes will be supported”.
Policy S10: Dark skies	Purpose para 8.30	Add the word ‘the’ to the final sentence “valued aspect of <u>the</u> parish”.
Policy S10: Dark skies	Justification para 8.33	Amend typo in final sentence “comprising” to ‘compromising’.
9. Transport and Movement		
Policy S11: Improving safe movement and promoting active modes of travel	Purpose para 9.1	This paragraph requires amendment as the KCC Local Transport Plan 4 referenced has now been superseded by the KCC Local Transport Plan 5 Striking the Balance now adopted by KCC.
Policy S11: Improving safe movement and promoting active modes of travel	Purpose para 9.12 final bullet point	Re ‘Framing Kent’s Future’ – suggest that this is reworded since to consider any successor documents as it is only dated until 2026.
Policy S11: Improving safe movement and promoting active modes of travel	Public transport para 9.15	It is suggested that the final sentence is amended to read “.....the wait for the return service is impractical and means that people now use their cars....”
Policy S12: Publicly accessible parking	Criterion c) ii	It would be worth contacting KCC to see if there is any availability of LEVI grant funding to assist with the provision of EV charge points.
10. Community facilities		

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Policy S14	Policy name	It is suggested that the title of the policy be changed to include the retention of existing facilities (in accordance with criterion C) to read: Policy S14: <u>Retaining and</u> Improving opportunities for community and cultural facilities, sport and recreation.
Policy S14	Conformity reference	Add TWBC SLP policies ED 12 (Retention of Local Services and Facilities), OSSR 1 (Retention of Open Space) and OSSR 2 (Provision of Publicly Accessible Open Space and Recreation).
11. Implementation and Review		
Para 11.3	Second to last bullet point	It is suggested that this is reviewed/amended, given the timeline for adoption of the emerging borough Local Plan of summer 2025.
12. Infrastructure Improvements and Provision		
Para 12.2	Reference to LDS – final bullet point	Requires an update as there is now an updated LDS dated March 2025 .
14. Policies Map		
Figures 14 and 15		See the comments made under sections 2 and 4 in relation to the LBD boundary.
15. Glossary		
General		It is suggested that the definitions be checked against the glossaries included in the NPPF and the emerging borough Local Plan for consistency with those glossaries. For instance, consider the consistency of the affordable housing and previously developed land definitions with the NPPF definitions.
Limits to Built Development		This is queried as this is not just previously developed land. It is suggested that this be amended to reflect the definition set out in the emerging borough Local Plan i.e. “A line around settlements defining the area which is considered to be within the limits of the built area and that which is outside in order to restrict the encroachment of built form into the surrounding countryside”.

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16. List of Evidence Documents		
General comment		This is likely to need a review when considering/responding to comments made above.
Other consultation documents	Design Guidance	
General		<p>It is good that the concerns about the design guidance raised at the Regulation 14 consultation have largely been addressed.</p> <p>TWBC has one minor comment on this version of the design guidance which is under DG.8 it would be good to include photographs to illustrate appropriate materials. However, the wording is agreed.</p>
Other consultation documents	Housing Needs Assessment	
Page 6 – para 1.7	Current Tenure Profile	Typo in line 3 , should read private ownership not rent.
Para 1.8		Take out the word ‘across’.
Page 7/8 – para 1.12	Affordable Housing Needs	It is noted AECOM estimates that most affordable housing should be provided as affordable ownership tenures which would be at odds with the Council’s SLP Policy of 60% social rent and 40% affordable home ownership.
Page 8/9 – para 1.14	Estimated delivery of affordable housing in Sandhurst	The AECOM research for affordable home ownership exceeds the 10 affordable homes to be delivered through the Local Plan site allocations in Sandhurst. We would support the Parish should they take forward the AECOM recommendation of affordable housing ‘Rural Exception Site’. Policy H5 of the SLP supports such provision.
Page 9 – para 1.19	Population characteristics	The study recommends the focusing of housing delivery on smaller units to help meet the needs of older people, given the ageing population over the Plan period. This is supported by Policy H6 in the SLP.
Page 10 – para 1.20	Future Population and size needs	AECOM recommends that 70% of new dwellings should be 2 or fewer bedrooms and just under 20%

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		should be four or more bedrooms. This is to reflect the needs of an ageing population and assist in altering the dwelling mix where large, detached homes predominate. This would be supported by Policy H1 of the SLP where any mix should reflect requirements of a 'made' Neighbourhood Plan or local housing needs intelligence.
Pg 10 – para 1.26	Need for Specialist Housing for Older People	The Study estimates a need for 25 to 27 specialist accommodation units for older people that may be needed over the Plan period. To accommodate such need would likely require a rural exception site to come forward given that the allocated sites will only provide 10 additional affordable housing units.
Pg 19 – para 4.4	Definitions	First Homes as an affordable housing product is no longer specified in the NPPF as a specific affordable product. The Parish may wish instead to focus on shared ownership as an affordable route to home ownership.
Pg 20 – para 4.7	Current tenure profile	Typo again should read 'private ownership' in line 3, not 'private rent.'
Pg 25 – para 4.27 – 4.31	Affordable Home Ownership	There is discussion here about a higher discount for First Homes than afforded in the SLP. Given affordability pressures and that there is now no specific requirement to provide First Homes, the Parish may want to consider shared ownership tenure instead.
Pg 26 – para 4.32		There is some concern over the affordability of Rent to Buy as a product as rents can be at a higher rate not allowing the tenant to sufficiently save for a deposit. There are also not many RP's that offer this as an affordable housing tenure.
Pg 28 – para 4.45	AECOM Estimates	The estimate of need based on the AECOM study suggests that 100% of new affordable dwellings in Sandhurst should be in affordable ownership tenures and that the Steering Group has expressed that there is little demand for affordable rent in the NA. However recent data taken for the Housing Register, (23 rd April) finds that there are 8 households waiting for social rented housing with a local connection to Sandhurst and 38 expressing a preference for Sandhurst as an area waiting on the Housing Register.

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Pg 30 – para 4.51	Evidence from the LPA	The data should be replaced with the following data from the LPA Housing Register in April 2025: Current households on the Housing Register with a confirmed Local connection to Sandhurst include 4 x 1 bed, 2 x 2 bed and 2 x 3 bed.
Pg 30 – para 4.54	Application of Local Plan Policies	The para notes that whilst NDP's can't normally influence the overall proportion of affordable housing, the research finds a robust evidence of need for affordable housing. The LPA would welcome discussions with the Steering Group around this topic particularly given the SLP Policy H5 Rural Exception Sites could be a mechanism for further affordable housing with the right provider partner and support of the Rural Housing Enabler.
Pg 31 – para 4 .55		The paragraph states that the local plan does not dictate a precise balance between rented and shared ownership. Whilst the Core Strategy 2010 does not, the Submitted Local Plan has a tenure split of 60% social rent and 40% shared ownership.
Pg 32 Table 4-7	Indicative tenure split (affordable housing)	Indicative affordable split includes First Homes. Given that there may be problems finding RP's to take affordable housing in the Parish, it may be preferable for low cost home ownership to be provided as shared ownership which RP's are normally more willing to provide.
Pg 33 – para 4.62	Conclusion	Typo again in line 3 should say 'private ownership' and not 'private rent'.
Pg 35 – para 4.69		Noted that the need for affordable housing is greater than that which will be provided through allocations and therefore the NDP may wish to pursue a rural exceptions site of all affordable housing. The SLP has a policy H5 'Rural Exception Sites'.
Pg 58 – para 6.37	The Role of Mainstream Housing	Paragraph states that the SLP does not require housing to be built to specific requirements for older people. However, Policy H6 Housing for older people and people with disabilities includes for new build housing to meet the optional M4(2) standards. Also, in Policy H6, 5% of the affordable housing in schemes over 20 units is to be built to M4(3) standards.