



Sandhurst Parish Council,
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Growth and Communities

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BY EMAIL ONLY

20 August 2024

Dear Sir, Madam

Re: Sandhurst Neighbourhood Plan (2022-2038) - Regulation 14 Consultation

Thank you for consulting Kent County Council (hereafter referred to as the County Council) on the Sandhurst Neighbourhood 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 3: A Vision for Sandhurst

Public Rights of Way (PRoW): The County Council is keen to ensure that it's interests are represented within the local policy frameworks of the Parishes in Kent. The County Council is committed to working in partnership with Parish Councils to achieve the aims contained within the County Council [Rights of Way Improvement Plan \(ROWIP\)](#). This aims to provide a high-quality PRoW network, which will support the Kent economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent a great place to live, work and visit.

The County Council considers that the Neighbourhood Plan objectives should have specific reference to the PRoW network and the role of the ROWIP. The PRoW network is a valuable resource that provides significant opportunities for outdoor recreation and active travel. The ROWIP can help contribute towards a robust infrastructure that enables development and encourages economic growth leading to regeneration and attraction of new businesses. The Neighbourhood Plan should make specific reference to PRoW and the opportunities offered to health and well-being, tourism, sustainable transport, and access to the environment as advocated by planning policy. The reference to ROWIP in this Neighbourhood Plan is welcomed.

It is requested that the County Council PRow and Access Service is directly involved in future discussions regarding projects that will affect the PRow network. The County Council can then advise on the design and delivery of these projects, ensuring that new routes successfully integrate with the existing PRow network. The County Council would welcome future engagement with the Parish Council to consider local aspirations for access improvements and potential funding sources for the delivery of these schemes.

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 this section and relevant policies could be strengthened to consider/require the use of Sustainable Drainage Systems (SuDS) as outlined in section 14 of the National Planning Policy Framework (NPPF) for new development proposals. The multiple benefits that SuDS can provide which include additional amenity and biodiversity benefits are well documented and would seem to align with this section of the Neighbourhood Plan.

Chapter 9: Transport and Movement

PRow: The County Council considers that the draft Neighbourhood Plan could include stronger references to PRow and to include a map of the PRow network (the Parish Council should hold a copy of the Definitive Map, if not, please contact the County Council) within the parish to clearly show the benefits and opportunities the asset offers. However, the Parish Council should be aware that the County Council is the Highway Authority for PRow and its role is to enable successful partnership working by continuing to deliver improvements to the PRow network in Sandhurst. Joint working can help to ensure significant benefits, whilst its omission could result in loss of access to additional funding opportunities.

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

PRow: Policy S11, point 'D' mentions proposals for new bridleways, however, the County Council would request that the PRow Network be specifically mentioned. Furthermore, the County Council requests the inclusion for the definition of a Right of Way, alongside an explanation of the acronym. The County Council suggests the following text: A way over which the public have a right to pass and repass, including Public Footpaths, Public Bridleways, Restricted Byways and Byways Open to All Traffic.

The PRow Network, as a whole, should be included in the Neighbourhood Plan as it provides important access and connectivity. Also, it reflects the extent to which the PRow network meets the likely future needs of the public in contributing towards more sustainable development. The County Council would advise partnership working to enable potential links along WC295 into East Sussex and Bodiam, which is a popular tourist destination. Lastly, all policies regarding Sustainable Transport, Connectivity and Access, and Infrastructure Provision should include reference to the PRow network.

Public Transport

PRoW: The County Council recommends the inclusion of the following phrase: In areas where there would be significant effect on PRoW, the network must also be included in the landscape planning of the infrastructure as a whole. Where PRoW would be directly affected by development proposals, plans should clarify intentions for positively accommodating, diverting, or enhancing paths. The policy should state that planning applications must not adversely affect the existing PRoW network. It is requested that additional text is inserted into the Neighbourhood Plan, stipulating that applicants for new developments engage with the County Council PRoW and Access Service at the earliest opportunity. This would allow the County Council to review proposals for access improvements and consider appropriate developer contributions for PRoW network enhancements.

The Neighbourhood Plan policy should reflect County Council policy to improve and upgrade the PRoW network where it links with amenities, public transport nodes, work and education to increase the attractiveness of walking, cycling and riding as an alternative to driving. There is an omission throughout the Neighbourhood Plan of any map showing the PRoW network within the Parish – this should be included within the Plan. The Neighbourhood Plan policy should also include that new developments incorporate good sustainable transport connections within the community with high quality walking and cycling infrastructure available, which can link local amenities together.

It is critical therefore that wording is included to secure funding to ensure the highly regarded PRoW links are not degraded. Developer contributions, where these meet necessary legal tests and relate to a specific development, can be used to upgrade existing routes or create new path links that address network fragmentation issues. Consideration should be given to the investment of planning obligation contributions into the PRoW network. Rural lanes provide useful connections for Non-Motorised Users (NMUs) travelling between off-road PRoW. The potential for additional vehicle traffic along these country lanes is therefore a concern, as increased movements could introduce safety concerns for NMUs and potentially deter public use of the PRoW network.

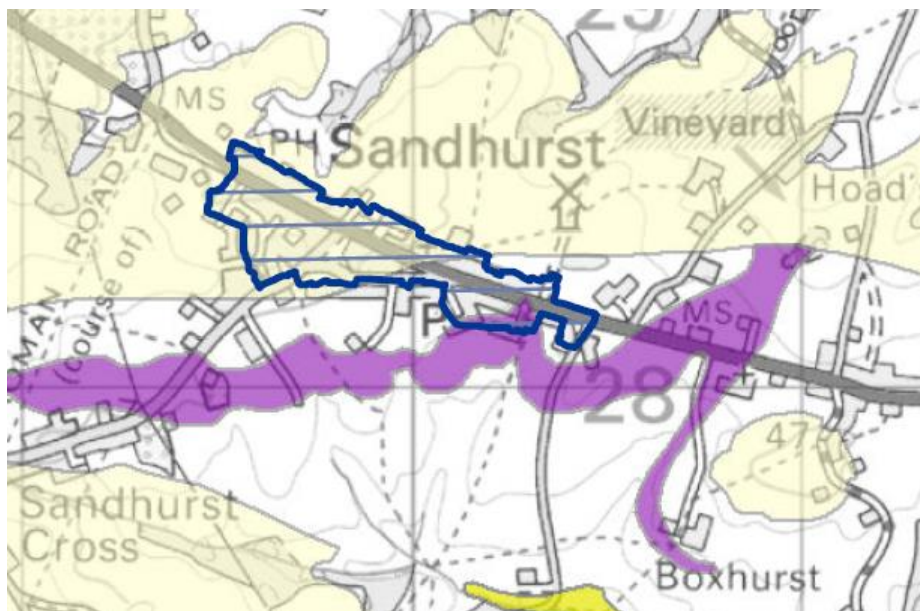
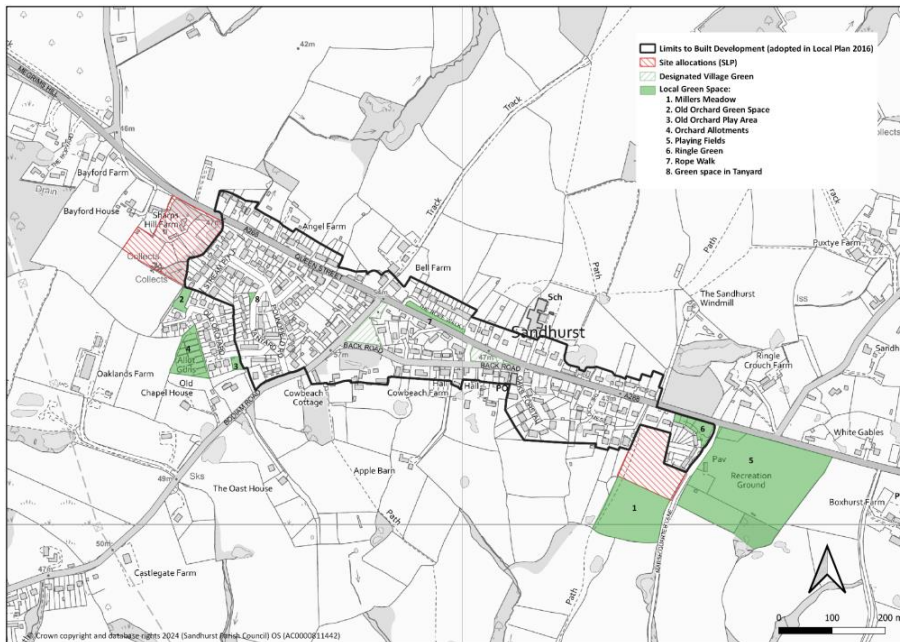
New development provides opportunities to secure investment in the PRoW network, which could enhance opportunities for active travel and outdoor recreation across the Parish. Developer contributions are used to upgrade existing routes or create new path links that address existing network fragmentation and issues highlighted by the public. Consideration should therefore be given to the investment of planning obligation contributions to support the PRoW network through any proposed development. .


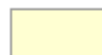
General Commentary

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 from 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. The Neighbourhood Plan makes no reference to this fact and the need to address mineral safeguarding.

A part of the Tunbridge Wells Local Plan process, the County Council concluded that the mineral safeguarding issues are not objectionable. Given that 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 but would recommend consideration and reference to this matter.



-  Sandstone - Wadhurst Clay Formation
-  Sandstone - Tunbridge Wells Sand Formation

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



Stephanie Holt-Castle
Director – Growth and Communities