

Sandhurst Neighbourhood Development Plan 2024-2038

**A report to Tunbridge Wells Borough Council
on the Sandhurst Neighbourhood Development
Plan**

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Executive Summary

- 1 I was appointed by Tunbridge Wells Borough Council in June 2025 to carry out the independent examination of the Sandhurst Neighbourhood Plan.
- 2 The examination proceeded by written representations. I visited the neighbourhood area on 15 July 2025.
- 3 The Plan seeks to bring forward positive and sustainable development in the neighbourhood area. It also includes policies to safeguard the built and historic environment and to designate a package of local green spaces. The Plan is commendably focused on a clear set of locally-distinctive issues.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the 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
6 January 2026

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Sandhurst Neighbourhood Development Plan 2024-2038 ('the Plan').
- 1.2 The Plan was submitted to Tunbridge Wells Borough Council (TWBC) by Sandhurst Parish Council (SPC) 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 allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. 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 because 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 and 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 existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and appearance. It also designates a package of local green spaces and promotes a Village Hub.
- 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 that referendum results in 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 TWBC, with the consent of SPC, to conduct the examination of the Plan and to prepare this report. I am independent of both TWBC and SPC. 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 significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

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 should proceed 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 Section 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 and am satisfied that they have been met.

3 Procedural Matters

- 3.1 In undertaking this examination I have considered the following documents:
- the submitted Plan.
 - the Basic Conditions Statement.
 - the Consultation Statement.
 - the Design Guidance.
 - the Housing Needs Assessment.
 - the TWBC Strategic Environmental Assessment screening report.
 - the TWBC Habitats Regulations Assessment screening report.
 - the representations made to the Plan.
 - SPC's responses to the clarification note.
 - the adopted Tunbridge Wells Borough Local Plan 2020 to 2038
 - the National Planning Policy Framework (December 2024).
 - Planning Practice Guidance.
 - relevant Ministerial Statements.
- 3.2 I visited the neighbourhood area on 15 July 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular.
- 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, I concluded that the Plan could be examined by written representations and that a hearing was not required.
- 3.4 The examination of the Plan overlapped with the final stages of the examination of the Borough Local Plan. TWBC adopted the Borough Local Plan on 10 December 2025. It covers the period between 2020 and 2038. TWBC and SPC jointly concluded that it would be appropriate to delay the examination of the submitted Neighbourhood Plan so that it could be assessed against the strategic policies in the newly-adopted Borough Local Plan. This process has ensured that, if made, the Plan will be fully consistent with the up-to-date development plan for the Borough.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development management 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 (as amended), SPC prepared a Consultation Statement. It is a very good example of a document of this nature. The Statement is concise and is underpinned by a package of appendices.
- 4.3 Section 2 of the Statement records the various activities that were held to engage the local community and the feedback from each event. It is helpfully organised into five stages. Table 2 sets out the sequence of events and activities.
- 4.4 Stage IV comments on the extensive consultation processes that took place on the pre-submission version of the Plan (June to August 2024). Section 3.3.2 helpfully charts public approval on a policy-by-policy basis.
- 4.4 Appendix B outlines the comments received on the pre-submission Plan and advises about the way in which SPC refined the Plan because of the comments received at this stage. This analysis helps to describe how the Plan evolved and progressed to the submission stage.
- 4.5 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. From all the evidence provided to me as part of the examination, I conclude that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. TWBC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.6 Consultation on the submitted plan was undertaken by TWBC and ended on 2 June 2025. This exercise generated representations from the following organisations:
 - Environment Agency
 - Historic England
 - Kent County Council
 - National Highways
 - Natural England
 - Southern Water
 - Tunbridge Wells Borough Council

- 4.7 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5. The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Sandhurst. It consists of the settlements of Sandhurst, Sandhurst Cross, Field Green, Sponden and Linkhill and is located to the far south-eastern side of the borough of Tunbridge Wells. It lies approximately 2.9 miles from Hawkhurst to the north-west, and approximately 3.6 miles from Benenden to the north. Northiam, in the neighbouring district of Rother (in East Sussex) is approximately 4.1 miles away to the south-east. Bodiam is 2.5 miles to the south. The A268 (Queen Street/Rye Road as it passes through Sandhurst village) runs approximately across the middle of the parish in an east-west direction. In 2021 the population of the parish was 1,421 residents in the parish living in 585 households. The neighbourhood area was designated on 19 September 2014.
- 5.2 The parish is located wholly within the High Weald National Landscape. Most of the parish forms part of the Hawkhurst Wooded Farmland Landscape Character Area, with the remaining area of the parish being part of the Rother Valley River Valley Landscape Character Area, sited in the southern part of the parish.
- 5.3 Sandhurst is the principal settlement of the parish which has an historic core designated as a conservation area and includes several listed buildings. There are also several historic farmsteads scattered across the parish. Sandhurst village has a defined Limits to Built Development.

Development Plan Context

- 5.4 The development plan context in the Borough has evolved as the examination of the neighbourhood plan has proceeded.
- 5.5 The Plan was prepared and submitted in the context of the former Tunbridge Wells Borough Core Strategy which was adopted in June 2010. It covers the period up to 2026. The Core Strategy sets out policies for the use and development of land across the Borough. Core Policy 1 and Boxes 3 (Spatial Strategy) and 4 (Settlement Hierarchy) set out an approach which has an urban focus for development to optimise the vitality of the Borough's town centres and to protect the distinctive character of the rural environment. In this context most of the new development is focussed at Royal Tunbridge Wells and Southborough. Core Policy 14 comments about development in the Villages and the Rural Areas.
- 5.6 The Core Strategy was underpinned by the Sites Allocations Local Plan. It was adopted in 2016. That Plan identifies a series of housing allocations in the Borough.
- 5.7 TWBC adopted a new Borough Local Plan on 10 December 2025. TWBC and SPC jointly concluded that it would be appropriate to examine the submitted Neighbourhood Plan against the strategic policies in the Borough Local Plan (once adopted) rather than those in the Core Strategy. The examination was paused to allow this to take place.

5.8 Policy STR1 of the Borough Local Plan sets out the Plan's Development Strategy. It delivers the Plan's vision which is:

- for Royal Tunbridge Wells and Southborough, to maintain their role as the main urban area, with a mix of housing, employment, leisure, and cultural developments, including by making effective use of urban land, whilst protecting their respective distinctive natural and built environmental qualities;
- for Paddock Wood, to provide for comprehensive planned strategic growth (including on land in east Capel parish) that is fully aligned with timely infrastructure provision and which delivers significant improvements in local employment, town centre, leisure, and other services/community facilities commensurate with its enhanced role, as well as ensuring that it is not vulnerable to flooding;
- for other settlements, to retain their essential local character, with high-quality sustainable development that reflects their environmental context, infrastructure, and site circumstances, having due regard to local needs;
- for the countryside, to retain its landscape, biodiversity, and historic character for its own sake, as well as a setting for settlements, whilst supporting sympathetic rural enterprise.

5.9 Other strategic policies in the Borough Local Plan which are relevant to the submitted neighbourhood plan include:

- Policy STR2 Place Shaping and Design;
- Policy STR4 Ensuring Comprehensive Development;
- Policy STR5 Infrastructure and Connectivity; and
- Policy STR6 Transport and Parking.

5.10 The BLP Plan's strategy for Sandhurst is captured in Policy PSTR/SA 1. It advises that the development strategy for Sandhurst parish is to:

1. *Set Limits to Built Development for Sandhurst village, as defined on the Policies Map (Inset Map 31) as a framework for new development over the plan period, incorporating the allocation Policies AL/SA 1 and AL/SA 2 into the Sandhurst Limits to Built Development;*
2. *Build approximately 20-30 new dwellings (including 40 percent affordable housing) on two sites at Sandhurst village, as allocated under Policies AL/SA 1 and AL/SA 2;*
3. *In relation to all development proposals for major development which would generate more than 100 light delivery vehicles (cars and vans of less than 3.5 tonnes gross weight) or 25 heavy duty vehicles (lorries, buses, etc. over 3.5 tonnes gross weight) annual average daily traffic (AADT) movements through the northern arm of the crossroads in Hawkhurst (i.e. approximately 250m to the north of the crossroads along the Cranbrook Road)) per day, to be accompanied by an Air Quality Assessment, with the development providing appropriate mitigation measures;*
4. *Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of a listed range of facilities*

- 5.11 In this context two sites are allocated for residential use in the parish
- Policy AL/SA1 - Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane, Sandhurst (10-15 dwellings) and
 - Policy AL/SA2 - Sharps Hill Farm, Queen Street (10-15 dwellings)

Visit to the neighbourhood area

- 5.12 I visited the neighbourhood area on 15 July 2025. I approached it from Hawkhurst to the north and west. This helped me to understand its position in the wider landscape and its accessibility to the road network.
- 5.13 I looked initially at the central part of the village around the school, the shop/Post Office and the petrol station. As the Plan comments, there are a complex range of uses in very close proximity to each other.
- 5.14 I then walked to the eastern end of the village. I saw the recently-developed housing off Millers Meadow. I looked carefully at the Playing Fields and the other proposed local green spaces in this part of the village.
- 5.15 I then walked back into the village centre and then along Back Lane. I saw the impressive village hall and the well-stocked selection of books in the former phone box.
- 5.16 I then continued along Back Lane and into Bodiam Road. In doing so I saw the attractive triangular green area and the adjacent green space which includes the War Memorial.
- 5.17 I walked along the A268 and saw the significance and popularity of the Sentido restaurant.
- 5.18 I then drove to Sandhurst Cross and Linkhill.
- 5.19 I drove back to Hawkhurst on the A268. In doing so I looked at Sponden and Field Green. Looking at the outlying parts of the parish highlighted its scale and the way in which the various communities related one to the other.

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 in the preparation of this section of the report. It is an informative and well-presented document.

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;
- be in general conformity with the strategic policies of the development plan in the area;
- 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.

I assess the Plan against the basic conditions under the following headings:

National Planning Policies and Guidance

6.3 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 December 2024 (NPPF).

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

- a plan-led system - in this case the relationship between the neighbourhood plan and the development plan context as described in Section 5 of this report;
- 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.

6.5 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.

- 6.6 In addition to the NPPF, I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area and includes a series of policies that address a range of development and environmental matters. It has a focus on safeguarding its built and natural environments and designating a package of local green spaces. It also promotes the development of a Village Hub.
- 6.8 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 is reinforced in Planning Practice Guidance (ID:41-041-20140306) which 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. Planning practice guidance also advises that planning policies should be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted, the Plan does not fully accord with these practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy for flexible workspaces (Policy S6). In the social dimension, it includes policies on meeting housing needs (Policy S2), local green spaces (Policy S8), and the promotion of a Village Hub (Policy S13). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It includes policies on character and design (Policy S3), heritage assets (Policy S5), and views (Policy S9). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in the Borough in paragraphs 5.4 to 5.11 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (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 why an environmental report is not required.
- 6.14 TWBC prepared a screening report in May 2024. It concludes that it is unlikely there will be any significant environmental effects arising from the draft Plan. As such, it does not require a full SEA to be undertaken

Habitats Regulations Assessment

- 6.15 TWBC also prepared a Habitats Regulations Assessment (HRA) screening report of the Plan at the same time. It assesses the potential impact of the Plan on protected sites.
- 6.16 The report assesses the impact of the Plan on the Ashdown Forest Special Protection Area (SPA) and the Ashdown Forest Special Area of Conservation (SAC) and Natura 2000 site. It advises that the boundary of the Ashdown Forest SAC/SPA lies outside the borough in Wealden District and is approximately 27km west of the closest part of the Sandhurst parish boundary (Appendix A). It concludes that it is unlikely there will be any significant environmental effects arising from the Sandhurst Neighbourhood Plan. As such, the 'appropriate assessment' stage of the HRA process that ascertains the effect on integrity of the European Site) does not need to be undertaken.
- 6.17 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. None of the statutory consultees have raised any concerns regarding either neighbourhood plan obligations. 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

- 6.18 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. There has been full

and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.19 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 the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. However, in some cases, I have also recommended changes 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. The wider community and SPC 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 (Section 41-004-20190509) which indicates that neighbourhood plans must address the development and use of land. It includes a series of non-policy actions.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan. The actions are addressed after the policies.
- 7.6 For clarity, this section of the report comments on all the policies. TWBC has suggested a series of modifications both to the policies and the supporting text. In most cases I have addressed the suggested changes to the supporting text collectively in paragraph 7.61 of this report.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

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

- 7.8 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.9 The Introduction sets out a clear background to the Plan. It identifies the neighbourhood area (in Figure 1) and the Plan period (in paragraph 1.1). It also comments about:
- the national neighbourhood plan agenda;
 - national planning policy;
 - local planning policy;
 - the High Weald AONB Management Plan; and
 - community engagement
- 7.10 Section 2 comments about the parish to very good effect. The information helpfully underpins several of the policies.

- 7.11 Section 3 comments about the vision and five objectives of the Plan and how they provide a structure for the resulting policies. The Vision neatly summarises the approach taken as follows:

‘Sandhurst parish in 2038 will be a welcoming, supportive, cohesive, sustainable, strong community, with a café – social hub for all generations at its centre. It will be safe for walking and cycling, with 30mph speed limits on the main and side roads and a school time speed limit of 20mph. It will be wildlife friendly with protected green spaces and a community garden for all ages. There will be fast fibre broadband to every home and business.’

- 7.12 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.

General comments on the policies

- 7.13 The policies are presented in clear policy boxes and are clearly distinguished from their supporting text.
- 7.14 Each policy has a Purpose and a Justification. This helps all concerned to navigate their way through the Plan. For consistency I use the Purpose in the Plan to summarise each of the policies. Each policy lists its conformity references to the Plan’s objectives and to other elements of the development plan, and to the National Landscape (formerly AONB) Management Plan. This is best practice.

Policy S1: Location of development

- 7.15 This policy sets out the Plan’s approach to the location of development within the parish. It emphasises the importance of new development being directed to the most sustainable locations, near to local services and amenities, which will help to protect the valued National Landscape and important green spaces and green corridors in the area. It will also help to protect against coalescence between the settlements in the parish.
- 7.16 This is a good policy which establishes a spatial strategy for the parish. It will result in sustainable development by concentrating new development within the Limits to Built Development and provide ready access to the available commercial and community facilities. Part B of the policy brings local distinctiveness to national and local planning policies for development in the countryside.
- 7.17 I recommend that Part A of the policy and Figures 2 and 3 are modified so that they reflect the Limits to Built Development as included in the Borough Local Plan.
- 7.18 The final section of the policy provides a series of criteria for development proposals in the countryside. Whilst its purpose is clear I recommend that it is presented in a different way to the substantive elements of Part B. I also recommend modification to the wording used to bring the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace Part A of the policy with:

‘Development proposals will be supported within the Limits to Built Development as shown on the map in Figures 2 and 3. Development proposals on brownfield land will be particularly supported, subject to compliance with other policies in this plan.’

Replace the final part of Part B of the policy with:

‘Any such development should:

- **not individually or cumulatively result in physical and/or visual coalescence and loss of separate identity of the individual communities in the parish, in particular coalescence between Sandhurst and Sandhurst Cross, Sponden and/or Linkhill;**
- **preserve or enhance the character or appearance of the area, with consideration given to how the proposal will mitigate any impacts on the character, or visual amenity, or tranquillity impact on the High Weald National Landscape; and**
- **where appropriate, enhance biodiversity in accordance with Policy S8 (Green and Blue Infrastructure).’**

Revise Figures 2 and 3 (and their titles) so that the Limits to Built Development corresponds with that shown in the adopted Borough Local Plan

Delete paragraph 4.4

Policy S2: Meeting Local Housing Needs

- 7.19 This policy seeks to ensure that there is a range of housing that is designed to be capable of meeting the specific housing needs of the parish. It is underpinned by the findings of the Sandhurst Housing Needs Assessment. It takes a comprehensive approach to these matters. In general terms, this is a good policy which has regard to Sections 5 and 8 of the NPPF.
- 7.20 TWBC comments about the proposed tenure splits and the suggested requirement for First Homes (in the details in Table 2). In its response to the clarification note SPC commented that the policy does not make this requirement and that it would be content to amend the justification to apply a greater level of flexibility on that part of the indicative housing mix. I recommend modifications to Table 2 to address these matters.
- 7.21 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

In Table 2 delete the First Homes row and in the Shared Ownership row replace ‘20%’ with ‘45%’

Policy S3: Character and Design of Development

- 7.22 The supporting text advises that good quality housing design can improve social wellbeing and the quality of life by improving the built environment, reducing crime,

improving public health, easing transport problems, and providing supportive neighbourhoods. The policy seeks to encourage development proposals to comply with the highest design standards, adhere to the High Weald Housing Design Guide and the locally-specific Design Guidelines and Codes (Appendix B). The policy and its supporting text add greater detail to the Local Plan policies which require development to reflect local distinctiveness but are not specific to individual parishes.

- 7.23 This is an excellent, locally-distinctive policy which is underpinned by the equally-impressive Design Guidance. In the round, it is a first-class local response to Section 12 of the NPPF.

Policy S4: Energy Efficiency and Design

- 7.24 This policy seeks to ensure that development proposals meet the highest environmental standards in terms of its construction, materials, and energy use. The Plan advises that this will help to mitigate against climate change and contribute to achieving the national target of zero net carbon by 2050.
- 7.25 This is another excellent locally-distinctive policy. Its non-prescriptive approach has regard to Section 14 of NPPF and the Written Ministerial Statement of December 2023 (Planning: Local Energy Efficiency Standards).

Policy S5: Conserving Heritage Assets

- 7.26 This policy recognises the important contribution that heritage assets (designated and non-designated) make to the local character and distinctiveness of Sandhurst, both individually and collectively. The Plan advises that they should be conserved, enhanced, and celebrated.
- 7.27 Part A of the policy comments about designated heritage assets. Part B identifies five non-designated heritage assets and applies national policy to these assets. Parts C, D and E comment about rural lanes, farmsteads, and the Sandhurst Conservation Area respectively.
- 7.28 In the round, this is a very good policy. Where appropriate, it adds local value to national and local policies on heritage assets. I looked carefully at the proposed non-designated heritage assets and noted the features which had caused SPC to propose their identification in the Plan. I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Policy S6: Supporting Flexible workspaces Opportunities for Homeworking

- 7.29 This policy recognises the growing contribution of home-based and small-to-medium sized businesses in Sandhurst and seeks to encourage opportunities for them, including by supporting the provision of start-up and move-on business units as well as the provision of a shared office space. The Plan advises that this would provide a greater incentive and opportunity for local people to work locally.
- 7.30 The policy takes a positive approach to these matters and has regard to Sections 6 and 8 of the NPPF. The second part of the policy takes a proportionate approach

towards the way in which new workspaces should be incorporated within their immediate localities.

- 7.31 I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Policy S7: Green and Blue Infrastructure and Delivering Biodiversity Net Gain

- 7.32 This policy seeks to ensure that the multiple benefits of Sandhurst's green and blue spaces (including their importance in combating pressure on wildlife, habitats, biodiversity, and geodiversity and in off-setting the effects of air pollution) are recognised and enhanced. The Plan advises that this applies particularly where individual spaces have a greater collective value as part of wider chains of green infrastructure. The Plan also comments that this will serve to support the requirement to conserve and, where possible, provide a net gain in biodiversity through planning policy whilst accommodating sustainable development.
- 7.33 Part A of the policy comments that as appropriate to their scale and nature, development proposals should be designed to create, conserve, enhance and manage green spaces and connect chains of green and blue infrastructure, as identified on Figures 7 and 8, with the aim of delivering a measurable biodiversity net gain at least 10%.
- 7.34 Part D of the policy advises that development proposals should maintain, enhance the natural environment, landscape features and the rural character and setting of the neighbourhood area. It also comments that development proposals should seek to incorporate natural features typical of the parish, for instance trees, wildflower meadows, heath, and hedgerows. This part of the policy helpfully comments that development proposals should demonstrate that they have addressed a series of technical matters.
- 7.35 The policy takes a very positive approach to green and blue infrastructure and the local delivery of biodiversity net gain. The Justification is very comprehensive and references national and local policy documents and research. As such it has regard to Section 15 of the NPPF. I recommend that the wording of part A of the policy is modified to reflect the suggestion made by TWBC and supported by SPC. It will bring the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace criterion A with:

'As appropriate to their scale and nature, development proposals should be designed to create, conserve, enhance and manage green spaces and connect chains of green and blue infrastructure, as identified on Figures 7 and 8, and provide a measurable biodiversity net gain at least 10%. Proposals that deliver a measurable biodiversity net gain of greater than 10% will be supported.'

Policy S8: Local Green Space

- 7.36 The policy proposes the designation of Local Green Spaces (LGSs) within Sandhurst that are demonstrably special to the local community. The policy is underpinned by the details in Appendix D. This is best practice. I looked at the proposed Local Green Spaces carefully during the visit.
- 7.37 Based on the details in Appendix D and my observations during the visit, I am satisfied that the proposed LGSs meet the criteria in paragraphs 106 and 107 of the NPPF. Furthermore, the policy approach reflects the matter-of-fact approach taken on paragraph 108 of the NPPF.
- 7.38 In this overall context I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Policy S9: Locally Significant Views

- 7.39 This policy sets out a series of views in and across the parish, which have been identified by the community as being important to safeguard. The policy seeks to safeguard the views from inappropriate development.
- 7.40 The policy is underpinned by the details about each locally significant view in Appendix E. I looked at a selection of the views during the visit. Their reasoning for their selection was self-evident. I noted that they captured the relationship between the various settlements and the surrounding countryside.
- 7.41 This is another good, locally-distinctive policy. In general terms I am satisfied that it has regard to Section 15 of the NPPF and overlaps with the High Weald AONB Management Plan. Within this context I recommend that the policy is recast so that can be more readily applied through the development management process. I also correct an error in the Plan about the reference to the relevant appendix.
- 7.42 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘The Plan identifies eleven Locally Significant Views as shown on Figure 11 (and as described in Appendix D).

As appropriate to their scale and nature, development proposals within the shaded arcs of the various Locally Significant Views as shown on Figure 11 should be designed in a way that demonstrates how they have taken into consideration the importance of the locally significant view or views in the layout, design or masterplanning of the site(s) concerned and have appropriately mitigated any adverse impacts on those views.’

Policy S10: Dark Skies

- 7.43 The context to the policy is that situated in the High Weald National Landscape, parts of the parish provide ideal locations from which to enjoy dark skies and stargazing. The Plan advises that these dark skies also support both nocturnal and diurnal wildlife. This policy seeks to ensure that development does not encroach on this valued aspect of parish.
- 7.44 I recommend that the policy should set out the requirements for development proposals rather than offering support to proposals. This would acknowledge that the application of other development plan policies would be involved in the determination of planning applications. This approach was agreed by SPC in its response to the clarification note. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with: ‘Development proposals which include external lighting should it protects the night sky from light pollution, and meet the following criteria:’

Policy S11: Improving Safe Movement and Promoting Active Modes of Travel

- 7.45 This policy seeks to enhance safer movement through Sandhurst village for all. The community particularly supported improvements to enable walking along routes which are most likely to encourage a shift away from the private car for short journeys in and around Sandhurst. The policy also seeks to promote the provision of infrastructure to support recreational horse-riding, as there are currently few bridleways in the parish, forcing riders onto the rural lanes.
- 7.46 This is a very positive policy which has regard to Sections 8 and 9 of the NPPF. I recommend a series of modifications to the supporting text as suggested by TWBC and as agreed by SPC in its response to the clarification note. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In paragraph 9.1 replace the link with one to the Local Transport Plan 5 Striking the Balance

In para 9.12 final bullet point delete ‘(2022-2026)’

Replace paragraph 9.15 with:

‘Currently Sandhurst village is served by only one bus - the No 349 Hawkhurst to Hastings which offers a two hourly service. Whilst there is a link with Hawkhurst the wait for the return service is impractical and means that people now use their cars which adds to the pollution and extreme delays at the traffic lights in Hawkhurst.’

Policy S12: Publicly Accessible Parking

- 7.46 The policy seeks to safeguard existing public car parking and support new parking in areas where parking is a challenge. Residential car parking is addressed in the Design Guidance and Codes.
- 7.47 I recommend that the opening element of Part C of the policy is modified to recognise that some of its outcomes may be permitted development. This was agreed by SPC in its response to the clarification note. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of part C of the policy with:

‘Insofar as planning permission is required the following facilities will be strongly supported where they complement existing and new parking provision:’

Policy S13: A Village Hub for Sandhurst

- 7.48 The Plan advises that the provision of local facilities and services is critical in a small rural parish such as Sandhurst. This policy seeks to support proposals that would contribute to the development of a Village Hub within Sandhurst village, creating a focal point for local activities. The policy sets out a series of locally-distinctive criteria with which development proposals should comply.
- 7.49 On the one hand, the Plan’s proposal for a village hub is both exciting and ambitious. On the other hand, I sought comments from SPC about whether the ambitions of the policy are capable of delivery within the Plan period. In its response to the clarification note it advised that

‘The community are very supportive of such a proposal. The Parish Council is in active discussion with two potential venues for the village hub. It is anticipated that the proposal is deliverable in the plan period.’

- 7.50 In the context of this assurance I am satisfied that the policy serves a useful purpose and is a positive local response to Section 8 of the NPPF. It is an innovative approach which is entirely appropriate for SPC to pursue through a neighbourhood plan. I recommend that the fourth criterion is modified to ensure that it has the clarity required by the NPPF.
- 7.51 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace criterion iv with: ‘Wherever practicable, the proposal should provide on-site renewable energy generation; and’

Policy S14: Improving Opportunities for Community and Cultural Facilities, Sport, and Recreation

- 7.52 This policy seeks to ensure that those living in and moving to the parish are adequately served with a range of good quality facilities and activities and that there are opportunities for residents to shape this provision. It addresses proposals for new community, recreational, cultural and leisure facilities (part A), the provision of new and upgraded play areas (part B), and proposals which would involve the loss of existing community, leisure, and recreational facilities (part C).
- 7.53 The policy has a very positive focus which has regard to Section 8 of the NPPF. Part C acknowledges that the use of community facilities may change in the Plan period. I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development. In this broader context I recommend that the policy title is modified so that it properly captures the contents of the policy.

Replace the policy title with: 'Retaining and Improving opportunities for community and cultural facilities, sport, and recreation.'

Implementation and Review

- 7.54 The Plan addresses these issues to very good effect.
- 7.55 As submitted, it commented about the potential impact of the adoption of the emerging Borough Local Plan. That issue has been addressed by the delay in the examination process. In this context recommend consequential modifications to paragraphs 11.3 and 11.6.

In paragraph 11.3 delete the fourth bullet point.

Replace paragraph 11.6 with:

'Whilst it is not a legislative requirement to review a neighbourhood plan, it is good practice to do so periodically. This may be because of any of the points noted above. A future review will enable the Parish Council to keep the Plan up-to-date. Any review will be undertaken in partnership with and ensuring the engagement of the wider community.'

Non-Policy Actions

- 7.56 The Plan includes a series of non-policy actions. They are set out in a separate part of the Plan as recommended in national policy.
- 7.57 I am satisfied that the Actions are appropriate to the neighbourhood area. The following Actions are particularly noteworthy:
- Traffic calming along the A268 and Bodiam Road as well as options for the introduction of a crossing point near to the school.
 - Explore traffic calming along parts of the local route network for instance, the A268, Bodiam Road and through Linkhill

- Options for the introduction of a crossing point near to the school.
- Explore ways to improve safety around the school, shop, petrol station area, for instance through traffic calming.
- Work with TWBC to develop an Appraisal for the Sandhurst Conservation Area.

Other Matters - General

- 7.58 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because 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 because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for TWBC and SPC 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 and to accommodate any administrative and technical changes.

Other Matters – The adoption of the Borough Local Plan

- 7.59 The recent adoption of the Borough Local Plan has overtaken the commentary in the Plan about the development plan context. I recommend modifications to Section 1 of the Plan accordingly.

Replace paragraphs 1.8 to 1.15 as follows:

‘The policies of this Plan must be in general conformity with the strategic policies of the Tunbridge Wells Borough Local Plan 2020 to 2038 which was adopted in December 2025.

The Local Plan seeks to deliver, across the borough, a minimum of 12,204 dwellings and 14 hectares of employment (Use Classes B (Business use) and E (Commercial use)) land, together with supporting infrastructure and services over the Plan period (Policy STR 1). The development strategy is shown indicatively on the Key Diagram.

The strategy for Sandhurst (Policy PSTR/SA 1) is as follows:

‘The development strategy for Sandhurst parish is to:

- 1. Set Limits to Built Development for Sandhurst village, as defined on the Policies Map (Inset Map 31) as a framework for new development over the plan period, incorporating the allocation Policies AL/SA 1 and AL/SA 2 into the Sandhurst Limits to Built Development;*
- 2. Build approximately 20-30 new dwellings (including 40 percent affordable housing) on two sites at Sandhurst village, as allocated under Policies AL/SA 1 and AL/SA 2;*

3. *In relation to all development proposals for major development which would generate more than 100 light delivery vehicles (cars and vans of less than 3.5 tonnes gross weight) or 25 heavy duty vehicles (lorries, buses, etc. over 3.5 tonnes gross weight) annual average daily traffic (AADT) movements through the northern arm of the crossroads in Hawkhurst (i.e. approximately 250m to the north of the crossroads along the Cranbrook Road)) per day, to be accompanied by an Air Quality Assessment, with the development providing appropriate mitigation measures;*

4. *Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of a range of facilities.'*

The Development Plan also consists of the Kent Minerals and Waste Local Plan (KMWLP) 2024 to 2039. It was adopted in March 2025. In addition, The County Council, as Minerals and Waste Planning Authority, has advised that there are significant safeguarded land-won minerals in the neighbourhood area, mainly a suite of sandstones that have low to no current demand. These minerals are now only suitable for historic building/structure restoration and building purposes. Any mineral safeguarding considerations would have to be addressed, as required by the adopted Kent Minerals and Waste Local Plan 2024 to 2039 and policy DM 8 where relevant.'

- 7.60 Given that the Tunbridge Wells Borough Local Plan has now been adopted, I recommend that the Conformity references at the end of each policy now refer only to that Plan rather than to local planning documents which have now been superseded.

Revise the local references in the Conformity section at the end of each policy to refer only to the policies in the adopted Local Plan

Other Matters – Specific

- 7.61 TWBC has suggested a series of helpful revisions to the supporting text. In several cases they update the detail in the Plan. I have also taken account of SPC's responses to the suggestions. In this context, and using the referencing system in TWBC's representation, I recommend the following modifications which are necessary to ensure that the Plan meets the basic conditions:

- Paragraph 1.6
- Paragraph 1.18
- Paragraph 1.21
- Paragraph 2.3
- Policy S3 B vii
- Paragraph 6.2
- Paragraph 6.5
- Paragraphs 6.6 to 6.11
- Policy S4 hyperlink
- Paragraph 6.12
- Paragraph 6.16
- Paragraph 6.18
- Paragraph 6.22

- Paragraph 6.23
- Paragraph 6.29
- Paragraph 6.32
- Paragraph 7.3
- Paragraph 8.30
- Paragraph 8.33
- Policy S14 Conformity References
- Paragraph 12.2
- Figures 14 and 15
- Glossary

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 2038. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area, to designate a package of local green spaces and to provide a policy context for the development of a Village Hub.
- 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 Tunbridge Wells Borough Council that subject to the incorporation of the modifications set out in this report that the Sandhurst Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood 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 Tunbridge Wells Borough Council on 19 September 2014.
- 8.5 I am grateful to everyone who has contributed to the examination of the Plan. The Parish Council's responses to the clarification note were both comprehensive and helpful.

Andrew Ashcroft
Independent Examiner
6 January 2026