Ash cum Ridley Parish Council is not against development. However we have grave concerns over the scale of development proposed particularly around New Ash Green and that this is being justified by declaring New Ash Green a sustainable location when, as we evidence below, it clearly is not and cannot be made to be with the proposed development given the evidence set out below. These proposals are therefore not justified. This document sets out our response to the plan. We have also included our detailed response to the individual sites as part of our response here under Policy ST2 but for convenience, have copied them into the online proforma the Council has provided for collating responses. Ash cum Ridley wishes to appear at the Examination in Public in order to address our serious concerns about:

1. The legal soundness of the plan due to the invalidity of the Sustainability Appraisal
2. Disagreement with several policies in the proposed plan as set out below as they are not justified.
3. Disagreement with proposed site allocations in the Plan as set out below because they are not justified and in some cases not deliverable.

It is imperative to understand the New Ash Green concept as a settlement. New Ash Green was designed and created as a standalone settlement from the late 60s. It is of a distinctive design and a low density with a significant amount of greenspace. The verges, communal spaces, footpaths and even the frontages of houses are owned by the Village Association, a community limited company. Whilst there are a few other historic workers 'villages in the UK, the only other modern village, we are aware of, built and managed in a similar way, is Lightmoor in Telford, recently built by Bournville Village Trust and still not complete. Even this village in Telford is different, being built from the start by a variety of developers.

Statements of Common Ground with neighbouring councils (formerly Duty to Cooperate) and Greenbelt

It would appear that there is good cooperation with Tonbridge and Malling BC and Tandridge DC but with Gravesham and Dartford councils, it appears limited, seemingly confined largely to consultation only. New Ash Green has more in common with the latter Districts to the north of SDC particularly for transport, work and education. Statements Of Common Ground is an important issue when considering as it is the merits of redefining parts of the green belt. NPPF GB41d and PM10 make it clear that consideration of redefinition of the green belt is amongst other criteria dependent upon what steps have been taken by the council to investigate the extent to which neighbouring authorities could meet any of that unmet need.

It should be noted that it was reported in a report to Development and Infrastructure Committee March 2024 that Dartford BC indicated it might be able to meet some additional need of about 600 houses in SDC. It now appears that that offer has been withdrawn by Dartford BC due to a lack of cooperation on the part of Sevenoaks DC as exemplified in their previous comments in the Reg 18 draft Plan in paragraph 1.15 and 1.16 and due to Local Government Reorganisation. Neither of these are sufficient reason not to cooperate with Dartford BC as set out in PM10 of the new NPPF, particularly the work to assess functional links between housing market areas which has not been done to date to make use of this offer. This is frankly an absurd position to take. SDC should accept the surplus from Dartford to allow them to promote less housing in unsustainable locations such as Ash cum Ridley.

In our view the requirements of the PM10 of the new NPPF have not been met at this stage, and this needs urgently rectifying if the new Local Plan is not to fail, as the last attempt did.

Sustainability Appraisal

Ash cum Ridley considers the Sustainability Appraisal (SA) accompanying this plan to be invalid. This makes the Plan legally unsound since all Plans must be accompanied by a legally valid Strategic Environmental Assessment incorporated within an SA.

We consider it invalid on 2 grounds explained in more detail below:

1. The SA has not used the most up to date evidence to review the Plan.
2. The SA has not reviewed sufficient reasonable alternative options/scenarios in its assessment.

We note that the SA was completed by outside consultants but ultimately the authority is responsible for ensuring the SA is legally valid.

Use of up to date evidence

Evidence prepared by external consultants still needs to be assessed and accounted for as to its significance up to the time a Plan is about to be submitted. Clearly this is more difficult where its significance is high and the self imposed deadline is approaching. In such scenarios, it may be that self imposed deadlines should be extended, so account may be taken of the evidence both in the Plan itself and the accompanying SA.

In this case significant evidence was completed only days before the Regulation 19 Plan was consulted upon. The draft 1 Transport Assessment is dated June 2026. We have further comments on this assessment later in our response, this section is confined solely to the Sustainability Appraisal assessment of that evidence.

This draft 1 Transport Assessment dated June 2026. That assessment did highlight the impact of the development on Billet Hill and Hoselands Hill at Hartley/Longfield which the SA did use in their evidence base. The SA was sufficiently concerned to suggest at paragraph 6.13.3 that there does appear to be a transport case for lower growth in Sevenoaks given the outcome of the latest Transport Assessment. 6.13.3 also quotes from the Transport Assessment "*Route 2 (B2173 London Road / M25) and Route 5 (M20 / A20Main Road, Gorse Hill) experience the most notable increases in journey times, with rises ranging between 12% and 17% during the PM peak period. This increase is likely driven by additional traffic associated with* …" This is a direct quote from the June 2026 document which the SA describes in the same paragraph as a quote from the "latest" document.

The SA concluded that the impact of the transport modelling on the sustainability objectives was either moderate or uncertain (and therefore coloured grey in the final table) due to the Transport Assessment being draft only.

However this document was superseded in July 2026 shortly before the Plan was consulted upon. The SA did not use the July 2026 document in its evidence base despite it also being dated July 2026. The superseding document is significant because this document in addition modelled modal shift. This is taking into account mitigation measures proposed in the plan to offset impacts from development. Crucially both documents found that Billet Hill and Hoselands Hill had exactly the same impact despite modelling modal shift, ie the mitigation measures would have no effect at all.

In August 2026 another document was published by the authority – Sevenoaks Local Plan Technical Evidence Base – Sustainable Transport Site Assessment Analysis to Inform the Traffic Modelling Scenarios. This document was published after the commencement of the consultation period. This is bad practice in any case. The SA was unable to take this evidence into account. This document also shows the severe impact of proposing development at New Ash Green which is modelled as "*Red – car dependent/low potential for modal shift".* In addition New Ash Green is the only settlement in this category which has more than 600 dwellings proposed. This assessment takes into account all employment development potentially reducing transport impacts by removing the need for people to travel by the development including sufficient employment and educational opportunities known as "*internalising*". If the SA had been able to take this evidence into account then it is strongly suggested it would have shown that New Ash Green would have not been able to meet the sustainability objectives and moreover calls into question the policy adopted by the Plan that settlements with more facilities should be treated as sustainable locations.

Water Infrastructure

An important piece of evidence ignored in the SA is the response from SE Water to the planned number of houses in Sevenoaks. They state in their response to the Reg 18 consultation "*we have identified that we cannot accommodate additional growth beyond what was assumed in our Water Resources Management Plan 2024 (WRMP24) in areas where we do not have a supply-demand surplus. Specifically, in the Sevenoaks area, where we currently lack available headroom in our supplies, it is highly likely that we would be unable to accommodate any growth exceeding our WRMP24 forecast assumptions throughout the entire planning period. This is because our WRMP24 was developed to balance supply and demand based solely on the growth forecasted and provided to us in recent years."*

"*We would like to highlight that the housing numbers proposed in your latest IDP in the period 2028-42 are considerably higher than we have in our WRMP24 forecast. Due to the current supply-demand situation in our WRZ1 (Tunbridge Wells) water resource zone this increase is likely to cause stress to our supply system. To assess the impact beyond our current WRMP24 forecast, we would need to recalculate our demand forecast and rerun our decision-making process. This would help us identify additional interventions, such as new supplies, transfers, or increased demand reduction programs, which would not be known until we complete the work for our next plan, WRMP29"*

Given this response to the last consultation, it is highly surprising that the SA concluded an uncertain or moderate effect and stated "Further information regarding the discrepancy regarding assumed rates of growth in WRMPs and the proposed rate of growth through the Sevenoaks Local Plan is set out in an appendix to the IDP. However, despite these discrepancies there is no clear evidence to suggest that water supply – and, in turn, concerns around low water levels affecting the water environment – will be an issue for the District over the plan period." This statement appears very much at odds with the response from SE Water. The SA suggests in paragraph 9.13.4 that addressing this major issue of whether there will be enough drinking water to supply to the extra dwellings proposed should be deferred until the after the conclusion of the Reg 19 consultation or the Examination in Public itself. This is an extraordinary response. The Reg 19 consultation is a consultation on what the Council concludes is a defendable Plan for growth. ready to be submitted to an Inspector for examination. Such a significant issue cannot be left to a later date when the known housing numbers are so essential in the plan.

In the case of water the SA has not attempted to use the best evidence available to ensure validity of the SA.

Wastewater and sewage has similarly not yet been resolved. The Thames Water wastewater network in New Ash Green and Hartley is old and liable to failure. It is unclear what the impact of additional dwellings will be on it.

We note that the Environment Agency support the statement in the plan that development should only take place if there is sufficient capacity, that development should be phased to allow the appropriate upgrades to be made and that upgrades are in place before the occupation the development. However they are silent on what should happen if there is a significant shortfall In provision. It notes that "*the Infrastructure Delivery Plan has shown consideration and requirement for additional capacity at the Swanley HWRC to accommodate the developments at Pedham Place, Swanley, New Ash Green, Hextable and South Darenth. It states that there is opportunity for this site to extend utilising existing KCC owned land, and that this extension will need to be completed by 2032 but that there is no mention of liaising with the Environment Agency during the early stages of the development plan, to ensure that such an extension is viable*". We also note that private sewage provision would not be supported by the Environment Agency. It should be noted that all the proposed developments around New Ash Green are situated in Source protection zone 3, the eastern half of the ST4-26 is within source protection zone 2 and a limited area within source protection zone 1, the highest protection, illustrating their vulnerability to unsuitable sewage solutions should major and more costly infrastructure not be available.

<u>Sufficient Reasonable Alternative options/ scenarios</u>

The table on page 52 sets out 6 “reasonable alternative growth scenarios” by adjusting development at various locations in the District. In all of these scenarios the proposed development at New Ash Green is constant at 844 dwellings. It is clear from the table that this is the largest untested allocation. Not only that it is also clear that when comparing scenarios, the developments at New Ash Green are far greater than those in individual scenarios.

For example comparing scenario 2 and scenario 3. Scenario 3 includes 150 additional dwellings at Kemsing and 300 at Hextable, making a total of 450 dwellings. The proposed development at Ash Place Farm between Ash and New Ash Green (ST4-26) for 530 houses is greater than this. Therefore another reasonable alternative option 2A would include Kemsing and Hextable but exclude ST4-26 at New Ash Green.

Another example would be comparing Scenarios 4 and 5. The change between these scenarios is additional dwellings at Westerham of 180 houses. The proposed development at the hamlet of West Yoke at New Ash Green (ST4-25) is for 280 houses. Therefore another reasonable alternative scenario 4A could be an addition of Westerham and exclude ST4-25 at New Ash Green.

For the avoidance of doubt, in using these scenarios as illustration, Ash cum Ridley makes no comment on the suitability of these sites at Kemsing, Hextable and Westerham and none should be inferred. This is simply a way of explaining why the Sustainability Appraisal is invalid by only selecting a few “reasonable alternative scenarios” and not assessing the sustainability of development at New Ash Green (or other development) in the same way.

Planning guidance on SA and SEA states that “*The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant.”*

Schedule 1 of the Environmental assessment of Plans and projects regulations 2004 sets out the criteria of what is considered “significant”. These include Characteristics of the Plan itself - 1c the relevance of the plan with a view to promoting sustainable development and 1d the environmental problems of the area and Characteristics of the effects and an area likely to be affected by them which includes vulnerabilities in those areas where environmental limits are likely to exceeded.

Given that proposed development at New Ash Green amounts to almost 5% of the total development of the District, this is considered significant in itself and certainly not less significant than other “reasonable alternative scenarios” assessed.

In addition given that the Transport Assessment of the Plan and SA has itself highlighted the significant environmental concern of the development on the highway network around New Ash Green that would exceed the environmental limits of that network (as noted above), this is considered sufficiently significant that development at New Ash Green ought to have been properly assessed through the SA.

We consider the Sustainability Appraisal to be invalid and therefore the Plan is not legally sound. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector. It should be noted that we do not take this position lightly and realise that it might result in delay to the plan which would be unwelcome to all parties.

We would welcome further discussion with SDC to find a pragmatic solution. We note that the proposed developments at New Ash Green, ST4-25 and ST4-26, are the largest developments proposed in the plan not subject to SA. We have also pointed out significant issues with these sites that affect their viability, particularly ST4-26. It is noted that whilst an SA does not have to assess all sites it must assess those that are significant, we consider ST4-25 and 26 are significant.

Paragraph 4.28 of the Plan - settlement hierarchy

Ash cum Ridley Parish Council strongly objects to New Ash Green being defined as a primary service centre and the subsequent reliance on this to determine that it is a sustainable location for significant development. This definition was based on the Settlement Hierarchy assessment dated 2025 based on a methodology dated 2022. Notwithstanding that the assessment for New Ash Green is incorrect, in 2026 it has changed since then. Shops have already closed. The post office, with its remaining village ATM, is proposed to close October 2026.

Having a few more children's play areas, village pub, or community facility does not make a settlement a more sustainable location, merely a more pleasant place to live. It is contrary to the new NPPF which emphasises in PM2 1a(iv)" *Has particular regard to meeting the identified development needs of the area in a sustainable manner in accordance with policy S1*".

Policy S1 1b states that a plan should provide "*for new development, and improvement of the environment, in a way that promotes a sustainable pattern of growth and seeks to mitigate climate change and adapt to its effects."*

Whilst a sustainable pattern of growth is not defined in the new NPPF from the remainder of the framework it is clearly not one that is wholly dependent on car travel as the prime mode of transport as shown by the Sevenoaks Local Plan Technical Evidence Base – Sustainable Transport Site Assessment Analysis.

Defining New Ash Green as a primary service centre and using this as a justification for more substantial development in this location is considered contrary to the NPPF.

We consider this paragraph unsound as unjustified. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

Sustainable locations and Strategic Policies ST1 to ST4

New Ash Green is at least 3km from Longfield railway station, a journey which includes a considerably steep hill. This is clearly outside the definition in Annex B of a reasonable walking distance (800m or 10 minute walk). The developments at West Yoke are considered to be outside the settlement of New Ash Green.

Paragraph 1.22 of the Plan states that "However, for grey belt to be considered for allocation and development, it needs to be situated in a sustainable location, with particular reference to public transport accessibility, as set out in NPPF para 148." However that paragraph goes on to say that New Ash Green is a sustainable location with no evidence to justify this. Ash cum Ridley objects to this as it is not justifiable as explained below. It is unclear:

- How the authority proposes to make this a sustainable location given the number of dwellings proposed
- How the authority can reconcile the evidence in the Transport Assessment July 2026 report which includes modal shift modelling that the impact of development could be mitigated against.
- How better links to facilities in Gravesham and Dartford will be made given there are none planned in either the Infrastructure Delivery Plan nor the KCC Bus Improvement Plan except for one earlier and one later education transport bus which would only run 46% of the year.
- How any service can be improved given there is a moratorium and reduced subsidies on buses at KCC.

Present situation

Most bus routes are not timetabled to run 46% of the year (school days only). The majority of the parish, including the village of Ash, is not served by public transport at all.
The 479 all year “commuting” bus does not connect well with the train station at Longfield (which is 3 miles away). The first bus available “links” with an indirect service to London with only 4 minutes to catch the train. The last bus of the day runs too early for most commuters. This is the only subsidised bus at that time, the other non subsidised (school days only) are moreover at capacity. KCC has reduced its subsidies so, it is reasonable to assume, buses cannot be extended from public purse.

Electric car plug in points although desirable, are impossible given the street design in most parts of New Ash Green and would be difficult to implement in most neighbourhood car parks given the Covenant terms. Ash cum Ridley Parish Council would like to see new installations which are in keeping with the design of New Ash Green centre, as part of that scheme.

The route from Longfield Station to New Ash Green a distance of 3 miles, includes a steep hill making cycling difficult.

Contrary to the Settlement Hierarchy, there is no secondary school in Ash Cum Ridley (save for a Special Educational Needs school) children travel to Longfield, Meopham, Wrotham, Dartford or Gravesend. Children wishing to study at North Kent College campuses at Gravesend or Dartford cannot rely on public transport because often there is no suitable return bus, the ones available being timetabled for travel from schools only. There is a huge dependency on private cars.

We have received ample evidence of the struggles parents already have getting children to local secondary schools. The existing buses run at full capacity with many passengers standing or children sitting 3 to a seat. By the time the buses reach Hartley, they are so full, they often do not pick up further passengers. Children are deprived from attending after school clubs, school play rehearsals, sports fixtures or additional tuition unless collected by car because there are no late buses. Young people attending North Kent College must have independent means to return home or use a convoluted train journey via Gillingham or 2 buses to and from West Kingsdown, and walk from either Longfield or West Kingsdown.

This high private vehicle usage is borne out by information in the 2021 Census. Travel by Car to work in Ash cum Ridley is 10% higher than the National average and 15% higher than Sevenoaks District as a whole, where it is already acknowledged that high car use is an issue. Unsurprisingly given poor public transport, less than 1% in Ash cum Ridley use the bus to get to work (3.5% less than the national average). There is also a significant drop in demographics in Ash cum Ridley between 20-40 year age range. It is well known that lack of public transport penalises younger people who are unable to live in New Ash Green without a car.

Spatial Strategy and strategic policies ST1 and ST4

Paragraph 4.28 of the Plan states that “The next tier down (service settlements) will be the focus for more modest growth, together with settlements, outside the National Landscape, where there is good public transport accessibility (i.e. a train station).

New Ash Green is not a sustainable location and as regards paragraphs 110 and 115 of the NPPF, is less sustainable than settlements lower down the hierarchy with a train station in the south and the north west of the District which are not in the National Landscape area.

Policy ST1 is not in compliance with the NPPF TR3 and TR1b which is concerned with the release of greenbelt land in sustainable locations. It should be noted that the beta version of the Connectivity Tool whilst recording connectivity for New Ash Green records the number of school bus pick up stops and does not reflect the very poor public transport in reality. These paragraphs make it clear that development land should be in locations with sustainable transport modes only. These are defined in the NPPF glossary as“ Any efficient, safe and accessible means of

transport with overall low impact on the environment, including walking and cycling, and public transport" it has been shown above that significant development in New Ash Green does not, and would not offer a genuine choice of sustainable transport modes.

Policy ST1 states that "there will be a particular focus on sites that are close to services and facilities **and/or** well-connected by public transport, walking and cycling. In order for this statement to be in compliance with the NPPF the "/or" must be removed. We do not agree that the proposed allocation of 840 dwellings (a significant amount of development) at an unsustainable location is compatible with "Sustainable patterns of development will be promoted by amending Green Belt boundaries only in 'exceptional circumstances', where 'greybelt 'sites have been identified which have good access to services and facilities, including public transport, and their release has limited impact on the purposes of the Green Belt."

Policy ST4 has allocated a significant quantity of housing to the New Ash Green area. It is difficult to envisage how this could be justifiable without significant improvements to sustainable transport and yet there are no proposals for improvements to this apart from a vague reference to a shuttle bus between New Ash Green and Longfield Station in Policy NAG1 with no indication how this would be funded. The reference to it in infrastructure delivery document which is an SDC document does not explain how this would be funded whilst there is a moratorium on additional bus expenditures at KCC nor what happens after the 5 year period. It is not in the KCC bus improvement plan.. The Sustainability Appraisal has issued caution towards this approach. Indeed there are more sustainable locations in Sevenoaks which have little or no allocated development which are more sustainable being adjacent to a railway station with frequent trains.

We consider these policies unsound as unjustified. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

Density and Design of Development and Policy H7 and DE3

Ash cum Ridley Parish Council welcomes the proposal in paragraph 4.33 that major development should accompanied by social value summaries embedding "social value into the planning process through an evidenced base and community led approach. However, given the unique features of New Ash Green and mindful of the direction the NPPF and PPG gives on design, we feel this should apply to all developments of more than 5 houses in or adjacent to New Ash Green.

We also welcome policy DE3 Ensuring Design Quality and would like to suggest that Ash cum Ridley works with Sevenoaks District Council to produce a village design guide. The Village Association already has one which is used to advise householders wishing to make alterations to their homes (over and above PD rights and underpinned by the Covenant management scheme) which could be extended for use by developers and authorities. We would like to explore this further with SDC.

In addition it is considered that the majority of New Ash Green is of sufficient design merit for it to be considered worthy of Conservation Area status. We are aware that it was proposed to explore this in 2023, but we have heard nothing since. We would like to explore this further with SDC.

New Ash Green was originally designed at a very low density of 26 houses per hectare eventually increasing to about 35 houses per hectare. Even so, the impact of this relatively low density is evident with insufficient space for cars in a settlement wholly dependent on private cars, which are encroaching on green space.

Paragraph 2.51 of the draft Local Plan states that a density of 35 units per hectare is now considered an inefficient use of land. We do not agree with this statement particularly when the additional land is used as well managed community Greenspace. Greenspace is a crucial element of good design and important for wellbeing. New Ash Green has a variety of spaces from very small intimate planting between blocks of houses to substantial areas suitable for play and outdoor

activities. It is this feature that gives New Ash Green one of its important local characteristics. New Ash Green is not a town centre and as a local centre, is not a transport hub. The density of the original New Ash Green is approximately 26 units per ha and later built areas are approximately 35 units per ha.

None of the gardens are particularly large, the reason for the reduced density is the ample communal spaces. The key is that it is well managed through a mechanism which has been in existence since the village conception nearly 60 years ago. The potential of Garden villages/towns to offer high quality living spaces is finally being recognised. That said New Ash Green is still somewhat unique, the only comparable modern one is Lightmoor near Telford as well as historic workers 'villages.

In addition policy ST1 and policy H6 states that "Development should be focused within the boundaries of existing settlements, including building at optimised densities and prioritising the use of previously developed 'brownfield land'". We do not agree with the optimised densities proposed for New Ash Green, as these would not be in keeping with existing densities.

Policy H7 recommends a density of 50-150 dwellings per hectare within New Ash Green and 40-60 dwellings per hectare on the village edge. Such densities would make it impossible for any additional development to be in keeping with the design of New Ash Green, necessitating 2.5 or 3 storey houses, flats, small courtyards and very little, if any, Greenspace. We fail to see how policies DE3 and H7 are compatible in New Ash Green.
The proposed density for villages of 30-40 houses per hectare, whilst still at the upper end of the scale of existing development, might be more acceptable but should not detract from the design of the village.

The new NPPF L3 2 b states that densities in edge of settlement should make the best use of a sites development potential taking into account all policies in the NPPF (including design); it recommends a density of at least 35dph at sustainable locations and a greater density of 45 near well connected rail stations. This policy is contrary to the NPPF and not justified.

We consider this policy H7 unsound as unjustified. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

Landscape and Policy NE 1

We do not support this policy because it does not reflect the statutory Planning Practice Guidance. This states that "Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence. Policies may set out criteria against which proposals for development affecting these areas will be assessed. Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary. The cumulative impacts of development on the landscape need to be considered carefully."

We do not consider that policy NE 1 does set out the criteria against which proposals will be assessed and crucially that applications which do not adequately mitigate against assessed harm will be refused to avoid adverse impacts on landscapes. The policy does not also assess cumulative impacts of development which are intrinsically hard to mitigate against and if cause adverse harm may result in applications being refused.

We are particularly concerned about the level of development proposed in Ash cum Ridley especially when considered against other developments already proposed and the subject of existing applications, ones which have already been screens for EIA and are in the pipeline or are already determined and the the cumulative impacts of these on landscape. This will also have an indirect impact on the availability of large scale green belt infrastructure and its association with the public rights of way. If existing residents cannot walk from their house onto PROW within natural

Greenspace they will get in their cars and drive to places that they can find greenspace such as Shorne and Jeskins Country Parks both near Gravesend and Trosley Country Park near Vigo or indeed the Pilgrims Way long distance footpath further away. This would have a negative impact adding to climate change.

a) A very large solar farm of 95 ha was proposed in the Hartley bottom valley below the village of Ridley. In addition a 5ha point of connection site is proposed at West Yoke.
b) A large extension and hotel at the London Golf Club south of Ash doubling its size.
c) A solar farm to the west of New Ash Green at Fawkham at the pre application stage .

We consider this policy unsound as unjustified. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

Housing for different ages and Policies H1and H4

We agree that a variety of housing should be provided to suit different needs. The 2021 Census shows though is that there are considerably less people in the 20-40 age range choosing to live in New Ash Green compared to the rest of Sevenoaks. This may be due to its lack of sustainable transport or its facilities, nevertheless there is a shortage locally of smaller 2-3 bedroom dwellings. Family accommodation and accommodation will always have some demand.

There is a growing need for accommodation for older people wishing to downsize, so smaller bungalows would be welcome. The census also shows that there is a significant drop in the oldest age band at 85+ living in the village. This is a significant drop compared to nationally available figures as well as Sevenoaks and other villages in the area (less than 1% as opposed to 8%). We consider that this is probably due to the lack of end of life care within the parish. There is only one nursing home in the parish and none in the largest settlement, New Ash Green. We note that one allocation is specifically for older people and have commented on this in comments regarding that allocation.

We consider this policy unsound as unjustified. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector in relation to that allocation or an alternative site.

Affordable Housing and Policy IN1 and paragraph 2.13

Text in a Local Plan expanding on the policies themselves has the same weight as the policies themselves.

Whilst not mentioned in the policy, paragraph 2.19 and 2.20 is not supported. This states "*On grey belt sites, it is expected that the % uplift in affordable housing will be delivered as social rented housing. Social rented housing provides the most affordable option and is the primary tenure which meets the housing needs of those households accepted onto the Council s Housing Register."* Affordable housing is defined as a variety of tenures in the NPPF glossary and we do not consider that **only** specifying social rented housing for Affordable Housing uplift for land made available through the new designation of grey belt, would best serve this parish. The text should be modified to include all types of affordable housing as defined in the NPPF Annex B. In a recent housing survey, there were 39 households looking for affordable housing in the parish, many of which would probably not qualify to be on the Council's housing register denying them a chance of a local home.

In recent years affordable houses built in a neighbouring parish were offered to residents in Ash cum Ridley however none of the 39 households on the housing need register qualified due to the strict rules on the housing register.

Policy IN 1 proposes that the Council should independently verify viability statements. We do not agree with this policy and believe that the Council cannot be regarded as being independent and has a vested interest in accepting viability statements for commuted sums to be paid instead of providing affordable housing especially as this money can be used to for example fund initiatives for general homelessness and the funding of other housing in the District for those qualified to be on the housing register rather than providing local homes for residents in Ash cum Ridley.

For example when a recent application for housing at Ash was determined last year, the SDC housing department accepted that affordable housing was not viable on the basis of the higher purchase price of the development site (this had an existing house which could have accounted for this.) However, the land in question was flat with good access and no contamination issues and it is hard to accept that this was not viable to include affordable housing. At another site at Manor Gardens a commuted sum in lieu of affordable housing was accepted which was then used to finance flats in Swanley.

A truly independent body should be used such as a specialist property surveyor using RICS viability advice or a District Valuer.

We consider this policy and text unsound as unjustified. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

Employment Land and EMP1

Map 3.1 on page 122 of the draft Local Plan should be amended to include all employment sites in the area. We note that none are included in the Ash cum Ridley parish: Ash House Business Centre, Heaver Trading Estate, Beechcroft Industrial Estate, Ash Manor Farm, Frieslawn Farm, Pettings Court Farm, Skein Enterprises, Bonnyacre Farm and Hartley Bottom Industrial Area. We agree that employment land should be safeguarded. All of these sites provide valuable local employment for a rural economy. Policy EMP 1 to safeguard existing employment sites is strongly supported.

Town Centres and NAG1 and CC1

We agree that “The unique characteristics of each of the town centres should be promoted to allow them to thrive and form a network of complementary centres, which provide for the needs of the District”. We also agree that “Development proposals will be expected to demonstrate how they have taken into account place-making proposals for the relevant centres, as set out in the subsequent policies in this chapter”. We note that policy NAG1 reflects that New Ash Green shopping centre has declined and in need of rejuvenation. We consider regarding point 6 of policy TLC1 and disagree that

a) sites of 100 units should be regarded as “strategic”
b) That additional small scale convenience stores should be provided at sites of this scale. This would have a fundamental effect on the viability of the existing shopping centre

In general we support Policy NAG1 and agree that the historical and architecturally unique centre should be the “vibrant heart” of New Ash Green. We agree with “Flexible space for small and creative businesses bringing more footfall to the centre, as well as new homes of different types, sizes and tenures” (point 2) and “improving the edges of the centre to open it up, and draw people in.” However, this will mean relying on not only residents of this parish visiting but also the neighbouring parishes and in an area of very high car dependency, this means providing sufficient parking spaces for visitors to the centre. Whilst we note the aspiration for a shuttle bus to Longfield station 3 miles away, we do not think that this is a realistic prospect however much wished for. We also wish to point out that the renewal at the centre edges will necessitate the involvement of the Village Association (should they be willing) as a key land owner of land at the centre edges.

We consider that some electrical charging points for vehicles should be provided. These should be of a non conspicuous design to blend in with the unique design of the centre car parks. We note that the EV infrastructure study states that Rapid chargers may or may not be viable but we would point out that public EV chargers are likely to be the ONLY potentially feasible means of providing any sustainable development in New Ash Green.
We endorse the proposal that renewal should celebrate "the centre's one-of-a-kind character and modernist SPAN architectural style".

We consider part 1 of Policy CC1 to be too imprecise particularly "capable of delivering improved local services and facilities minimising the need to travel for day-to-day needs;". Targets for sustainable locations need to be SMART otherwise they will never happen. The proposal for a shuttle bus as well as the additional transport in the Infrastructure Delivery Plan is unrealistic, it is also not included in the KCC bus improvement plan. We feel this policy attempts to justify the significant development proposed in this area and fails to do so.

It should also be noted that whilst a movement hierarchy which concentrates on "active travel" might be suitable for younger people (the 2021 census shows there are less than average 20-40 year olds (compared to national and Sevenoaks as a whole) living in Ash cum Ridley, "Active Travel" is less than appropriate for an aging population.

Sustainable Construction and Design and paragraphs 5.1 to 5.8

It should be noted that the design of housing in New Ash Green particularly is of sustainable construction and New Ash Green also has a sustainable water system, in which grey and storm water is filtered down to the aquifer to be recycled.

We endorse the concept of good design in paragraph 5.1 of the Plan. The design of New Ash Green in particular and its sustainable concepts that underpin it are a feature of the village designed at its outset. Indeed a design which is worthy of New Ash Green being designated a Conservation Area which the Parish Council would endorse. There are well managed community spaces (including the frontages of houses) and green infrastructure; footpaths, also managed, are away from highways. The management is financed by a covenant mechanism which also controls development proposals to ensure the design principles of New Ash Green are maintained. The Village Association has circa 55 years of expertise in this and are the best placed to give design advice for New Ash Green, the design panel consists of professionals such as architects and surveyors and neighbourhood residents 'associations which input into the process. It is considered that whilst for the rest of Sevenoaks, a new Community Review Panel and a Design Advisory Panels (as set out in paragraphs 5.5 to 5.8) would be a potential improvement where there are none, the best way to ensure good design in New Ash Green, including the maintenance of paths, play areas and Greenspace, is the current mechanisms overseen by the Village Association. It is considered that the proposal for these panels would dilute the design in New Ash Green rather than improve it.

In addition the Village Association already has a design guide for the village and this could be extended to provide a useful document for any new development. The Parish would like to discuss with Sevenoaks to production of a village design statement with a view to it being adopted as an SPD with existing documents as a starting point.

We note the desire for development briefs in paragraph 5.15 which we endorse. However we are disappointed that none has apparently been proposed for the development west of Chapel Wood Road (ST4-25) which has come forward in advance of the Plan. This well meant intention does not bode well for future sites.

We wish to appear at the Examination in Public in order to put further points across that arise regarding the unique design and particularly answer any queries on this from the inspector.

Policy CC3 and solar development

As stated in paragraph 4.27 of the proposed plan, the locations for potential sites for future stand alone solar farms is based upon the study commissioned by SDC dated July 2026 Solar PV development study. Policy CC3 (3) states that the locations on map 16 of that study reproduced in the local plan will be a basis for future development and will be given significant weight. It follows therefore that the study should be a piece of robust evidence that it should be used in this way. Sadly this is not the case and we strongly object to policy CC3.

This study is a high level assessment which cannot be used in this way.

1. It uses “evidence” and data not designed for the purpose it has been used for in the study;
2. it misrepresents planning appeal decisions as “case law” with precedent for future decisions and
3. omits key constraints that it should have considered.
4. It importantly does not use evidence from planning applications which it has already determined.

Evidence in the study

The study fails to take into account setting as a concept. By using strict criteria of within or outside a heritage feature or national landscape, it fails to take into account the setting of a heritage asset nor heritage landscapes nor whether a site within a national landscape would impact on the NL statement of significance. Not all sites in the NL should be excluded and conversely the setting of land within the setting of a nationally important heritage asset may render such a site unsuitable.

Ancient woodland is an irreplaceable resource for which there is a presumption for its retention, the only exception being exceptional circumstances for nationally significant infrastructure. Solar farms within the remit of SDC and this local plan, are, by their very nature not NSIPs and therefore, fall well short of that definition. There is much ancient woodland in the north Kent area and peripheral infrastructure associated with any proposal such as access ways connecting fields, insufficient buffers, impacts on protected species and plants and remnant hedges which are the remains of AW may all be affected by such proposals and would be inappropriate. This is even more so where AW is scattered rather than being in a single block.

The Agricultural Land Classification was defined as a high level classification of national Agricultural land divided into 5 categories. Drawn at a the old 1” to a mile scale it was never designed to be used at a field scale and there is still the proviso set out with the use of this data , yet this is exactly what the study has done , creating field parcels where solar development is possible. There policy then goes further and gives great weight to these sites.

Misrepresentation of appeal decisions as case law.

The study gives 3 examples of appeal decisions which it refers to as “case law” on page 31 of the study. These are in the footnotes of the same page. Appeal decisions can never set a precedent and should not be regarded as such since every planning application will differ and be more or less acceptable weighing up the planning balance. The study has used these appeals as a justification for Best and most versatile (BMV) land to exclude 3a and be treated as a “soft” constraint. Just because certain appeals in the planning balance decided that the need for the solar power outweighed the BMV constraint does not mean 3a should now be excluded in its definition. The new NPPF confirms that BMV includes 3a. This of course produces a dilemma for the study because the ALC does not differentiate between 3a and 3b . So much easier to “find” a reason to exclude it all which it cannot do.

There are more up to date limited individual surveys of land associated with planning applications. Where these have been refused and not pursued the data still exists. Where they exist they should be used. In the absence of such data , the type of agricultural use (arable or pastoral for example) can be a guide too but is not absolute.

Missing data

Battery energy storage systems (BESS) are essential for modern solar farms to store energy for transfer to the grid even when the sun is not shining to provide energy when there is higher demand.

Appendix E of the study sets out the conflict between BESS and their potential fire risk which is relatively high and requires greater consideration. Containing heavy metals and pollutants, they pose a high risk to aquifers if allowed to enter the drinking water. This can occur tending to a fire due to the fire water itself becoming a pollutant or a spoilage from the BESS. Parts of the district are geologically chalk or overlain by shallow clay with flints or alluvium. These areas contain the boreholes to provide thousands of people in the area with a safe drinking water supply. These areas are protected and shown on the DEFRA magic mapping system. Due to their storage at depth and their nature they undergo little in the way of filtration. Zones 1 and 2 should be automatically excluded as a significant constraint and advice taken from the EA and water companies about the appropriateness of zone 3 being included. It should be noted that South East Water drew attention in their Regulation 18 response to the danger of allowing inappropriate development near their drinking water assets and referred the authority to the EA Groundwater Protection document number 3.

Solar farms by their nature are large and have a significant impact on landscape. The only constraint that has been used is the national landscape, which is automatically excluded (even though there may be sites which do not conflict with the statement of significance). Other landscape constraints such as heritage landscapes (the historical landscape mapping available from the KCC archaeological record records features such as old orchards and untouched pastoral landscapes, lychets and other features of ancient field systems, all of which may justify a site as being unsuitable for solar development.

Locally valued landscapes have been excluded as a constraint , meaning that land with a high landscape value now has a significant presumption of being suitable for solar development In policy CC3. This is contrary to paragraph 8.9 and policy NE1 of the Plan.

Previous planning applications

Whilst the decision in a planning application cannot be used as a constraint (in the same way an appeal can't as set out above) , the evidence which led to that decision can.

A previous recent decision at Ridley Court erroneously marked on figure 13 as a proposal was refused in June 2026. This application had an up to date agricultural survey and an ecological survey. Independent advice from experts which was relied upon in making a decision on landscape and heritage landscape is available and other surveys which might contribute to an assessment of this site. It is perverse that a site refused on landscape and heritage grounds - constraints which should be hard to overcome should now be designated to be a suitable solar siite and given significant weight. At this site , the addition of a BESS was objected to by the EA before it was removed but the applicant though this made it it less attractive as a viable solar farm.

The evidence from previous unsuccessful applications should be scrutinised and used appropriately.

We consider policy CC3 unjustified due to the lack of evidence underpinning it. We wish to appear at the EIP to discuss this further and answer any questions from the inspector.

Heritage and policies HEN2, HEN3 and HEN6

There are various archaeological sites of varying importance in Ash cum Ridley ranging from nationally important Mesolithic and other remains at Ash Place Farm to significant remains at

Scotgrove Manor which adjoins the Chapel Wood Road site. We consider that paragraph 7.6 needs further clarification. “Local” can be construed as meaning insignificant, the addition of the phrase “ ie not regional or nationally important” is considered more appropriate.

It should also be noted that not all nationally designated underground archaeology is designated and development proposals may unearth as yet undiscovered archaeology of as yet unknown importance. Your attention is drawn to Policy HE7 2 and 3 of the NPPF and footnote 64 which this policy should reflect (copied here for convenience) .

Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.”

It is considered that policies are very weak. The policies HEN 2 and HEN 3 omit to say anything about the significance of the archaeological remains and refusal if they are more important than the proposed development. Archaeological Notification Areas are a new concept. However, they are suspect to change and non inclusion in one does not mean an absence of any which may be significant.

We note and endorse policy HEN6 and consider this applies to New Ash Green shopping centre which we consider of historic interest. This policy should be used in conjunction with policy NAG1 for any proposed redevelopment of it.

Biodiversity and woodland

We note that the Sustainability Appraisal cautions the significant and widespread occurrence of Ancient Woodland in this part of Sevenoaks District. Ancient Woodland is an irreplaceable habitat with a presumption of retention and protection. It should be noted that the exceptional circumstances in the footnote to that paragraph is for nationally important infrastructure such as HS2. There are no proposals of that scale in the Sevenoaks Local Plan, if policy BW3 has to include a reference to exceptional circumstances it must clarify this with the wording in the footnote.

We draw your attention to the Natural England guidance on Ancient Woodland. It highlights the importance of connecting hedgerows where piecemeal AW occurs as these are often remnants of ancient woodland. It should also be noted that White Wood, a substantial ancient woodland now only abutting ST4-26, was until at least 1970, shown on mapping as covering half of ST4-26 joining with Spring Cross woods to the North. Hedges across the site are remnants of this. These hedgerows are not generally mapped as ancient woodland but are just as ecologically important as it and also irreplaceable.

Natural England has also mapped woodland that has been designated as a National Habitat network. These are woodlands which are not Ancient Woodland but have been identified as being associated with them and capable of enhancing it. These networks are considered to be a baseline for nature recovery networks as required by the 25 year Environment Plan. One such network adjoins ST4-21 Whilst the majority of this site is a currently used as a back garden, a small proportion of it lies within the woodland. This is not considered suitable for development.

National Habitat networks should be included in BW1.

We consider this policy unsound as unjustified. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

Infrastructure

We wholeheartedly support note that sufficient infrastructure is included with planning applications. For example the GP surgery for Ash cum Ridley could not cope with even a modest increase in development.

Play areas

We support the provision of play and activity spaces for children and young people. However viability again needs to be verified by a truly independent third party. We consider there should be a mechanism for the ability to pool funds from a series of developments to fund needed play and activity facilities needed by an area. For example New Ash Green has need of an all weather multi use games area for young people which could be provided off site within the settlement or as part of a new development.

It is considered that the thresholds in policy OS2 for play equipment to be provided in conjunction with development are not sufficient. For example we do not think 500+ housing developments should be the only developments required to fund play areas designed for children over 8 years old. This is extremely insufficient. All children need places to play and antisocial behaviour can arise particularly in more dense housing with little garden space if not provided.

Community Facilities

We consider pubs in New Ash Green fall within the definition of a community facility because they serve as a gathering place that supports social and recreational activities and contributes to the well-being of the local community. We consider pubs should be included in policy COM1.

Car-parking standards

As set out several times in this response New Ash Green and Ash cum Ridley parish as a whole is currently very dependent on car use. There is no public transport at all outside of New Ash Green and the peripheral Wrotham Road. We do not consider this likely to change. Many families rely on 2 cars to get children to education establishments (which do not currently even provide transport from after school clubs and sports) and to get to work. We note that the policy states that the parking standards in Annex 1 provide a starting point for determining parking provision and may be flexibly applied where justified by local circumstances. It is considered that Policy T3 should specifically include provision for additional parking including communal parking in settlements reliant on car usage. Where this is not provided, cars are parked on Greenspace and other inappropriate places.

We consider this policy unsound as unjustified. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

Comments on site allocations

EMP2-8 Beechcroft Industries

This allocation is supported because of the important retention and expansion of employment opportunities in the local area. It is noted however that this site has not been listed nor marked on the map 3.4 accompanying policy EMP1.
We recommend that the mature trees on the eastern boundary should be protected by a stand-off.

EMP2-5 Hartley Breakers

This allocation is supported because of the important retention of employment opportunities in the local area. It is noted however that this site has not been listed nor marked on the map 3.4 accompanying policy EMP1.
It is noted that a well used public footpath adjoins the site which should be retained.

ST2 -31 The Forge

If this site cannot be retained as a retail use, then its redevelopment as a small residential site is supported. This site adjoins the ancient part of Ash Village known as Butlers Place and the design of this development should be informed by this area which has a locally distinctive style.

ST2 -32 New Ash Green village centre

This allocation is conjunction with the improvement of the retail element of the Centre. This policy is supported providing that there is no loss of car parking for the centre and the community and educational facilities that adjoin it. If this cannot be achieved without significant loss of car parking and facilities then this allocation would be difficult to support in full.

ST4-22 Grosvenor, Church Road

This allocation is supported and is strongly supported for housing for older people who wish to downsize to smaller accommodation such as 2 bedroomed bungalows. We also consider that this would be a good location for a low rise care home for older people the need for which is set out above. This is quite a large site which could be used more effectively. However we consider the proposed density of 20 houses equivalent to 40dph is too dense to include alongside a care home, the case for which is made above.

Given the lack of footways and narrow highway at this point, we support the inclusion of a pedestrian footway into Caling Croft, the adjacent New Ash Green neighbourhood in the design brief. The design of the development should be informed by the same neighbourhood. This should include pedestrian access at the front of houses, with parking at the rear. High-quality, well managed, communal Greenspace and planting, footpaths way from internal roadways and the use of some sustainable materials and similar brick colour to that of New Ash Green (yellow not red) .

Due to the proposed density of dwellings on the site; omissions in the design brief regarding design compatible with that of New Ash Green and the potential of the site for a new care facility that could be explored further, we wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

ST4-25 Land West of New Ash Green

These 2 sites which form part of one allocation are not supported due to their scale. This allocation is currently in the Greenbelt. To be considered as grey belt, policy GB4 1d(I) of the new NPPF applies.

"*Demonstrate that new Green Belt boundaries are broadly consistent with the spatial strategy for accommodating growth and meeting development needs across the plan area and adjoining areas, including those of any relevant spatial development strategies. This includes ensuring that any alterations to Green Belt boundaries promote sustainable patterns of development, including by:*
i. Giving priority to the release of previously developed land within the Green Belt,
then to grey belt land which is not previously developed, and then other Green Beltlocations, so long as this promotes a sustainable pattern of development overall;
and
ii. Not proposing alterations where there is clear evidence these alterations would fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan."

The Green Belt Assessment 2025 assessed these 2 sites separately. Both were considered to have poor boundaries to the west after development in terms of performing well subsequently as development on the edge of a new green belt. When setting new green belt boundaries which is necessary when defining grey belt, policy GB4 1f requires Planning authorities to "*Ensure Green Belt boundaries are defined clearly, using physical features that are readily recognisable and likely to be defensible*".

If a boundary is not currently clear, (as these have been assessed as unclear), then the new boundary cannot be defined and the new green belt definition fails. This is because it would allow further unchecked development westwards defeating the purpose of the green belt.

It is not permissible to just reinforce a boundary as suggested, it must exist at the redefining. Boundaries should be clearly defined using readily recognisable physical features that are likely to be permanent.

As set out above, New Ash Green is not a sustainable location particularly in terms of sustainable transport as defined in policies GB7 g (iii) and TR3 1a of the new NPPF in particular. "*Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are sustainable (or which can be made so, taking into account planned improvements, including any provided for as part of the development itself). This means the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical***;"**

Planning Practice Guidance states "*For the purpose of these decisions, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate".* This guidance is still extant.

The Sevenoaks District own Transport Assessment states in paragraph 103 "The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

However the latest Transport Assessment dated July 2026 shows that even with such mitigation, Billet Hill and Hoselands Hill will be at capacity.

New Ash Green has some limited employment but 58% of the working age population rely on a car to get to work. All secondary school children rely on school buses which do not permit them to stay after school for clubs or tuition or rely on a car to get them home from them. Further education pupils (16-18) rely on a car to return home. Longfield with better transport connections is 3 miles away down a steep hill. It is difficult to see how the present situation can be improved with no realistic proposals to do so in documents accompanying the plan. PPG also states "***. However, in reaching these judgements, national policy is clear that authorities should consider opportunities to maximise sustainable transport solutions, as set out in paragraphs 110 and 115 of the NPPF.*** These must be realistic.

The scale of this allocation is unacceptable in landscape terms. It would dwarf the hamlet of West Yoke that the greenbelt washes over. West Yoke is an attractive hamlet separate from New Ash Green. It would have a significant effect on its character and change it from a tranquil location to an urban settlement. Whilst previous case law states that openness is not a consideration for grey belt, the new NPPF makes it clear that it is an important consideration for green belt. Previous Footnote 55 to the 2024 NPPF cannot apply where a village is in the green belt and yet a large development is proposed adjacent to it which would compromise its boundary, urbanising its character and destroying its openness. Indeed it states in paragraph GB4 1b, that such an application would not be acceptable and should be refused.

This proposal would have a significant detrimental impact on the openness of the hamlet of West Yoke.

2 pedestrian crossings would be necessary for this allocation to access facilities in New Ash Green, the bypass separating the site from New Ash Green is 40mph. In addition, additional

pedestrian access would also be needed from a crossing to join existing routes to the village centre and facilities. However pedestrian crossings might deter the use of the bypass and divert more traffic through the village. Given the size of the allocation, it is highly likely a second access would be necessary. There is limited space for 2 accesses onto Chaoel Wood Road including visibility splays for both accesses without affecting third party land and pedestrian crossings.

If sustainable active transport measures are mitigation for this development to make local travel sustainable to reach local facilities, these need to be realistic. Whilst there is a narrow footpath alongside the New Ash Green side of Chapel Wood Road, the land beside it belongs to a third party opposed to the development. Widening of the footpath may therefore necessitate works in the carriageway itself. There is no footpath on the western side of Chapel Wood Road.

NPPF N1 1c states that local plans should "steer *the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework. This should include …. avoiding the use of higher quality agricultural land where land of poorer quality is available*"
BMV land is defined as Grade 1,2 and 3a. It is noted that the majority of this land has been assessed as Grade 3. However the original land classification did not define 3a and 3b and moreover should NOT be used on a field by field basis. If no post 1988 survey is available then other information should be used at this stage including historical and adjacent data. Whilst this land has been used as pony paddocking for some time, it is flat and at the very least suitable for pasture. Nearby and adjacent similar flat fields have a long history of arable and market gardening farming. Adjacent fields before they were a golf course which are sloping were used as pasture. It is therefore reasonable to assume that these fields may be considered BMV land and should be assessed to determine their grade. NPPF N2 1b states that where land is being allocated the lesser graded land should chosen instead.

The northern part of the allocation lies adjacent on 2 sides to Ancient Woodland separated by a narrow belt of trees with a high degree of ecological value and is undoubtedly ancient woodland itself. Sufficient margin should be left to protect all of this habitat. A minimum 15-meter buffer is the minimum acceptable standoff for ancient woodlands. However the buffer may need to be increased, potentially to 50 meters, where pollution (e.g., construction runoff) and trampling are potential issues. In this case trampling may be a significant issue if insufficient Greenspace is allocated. A buffer should not typically contain new buildings, services, or Sustainable Drainage Systems (SuDS) and should be comprised of semi-natural habitat.

Within Chapel Wood adjacent to the site lies a significant archaeological site. Scotgrove Manor was a substantial medieval manor estate that was abandoned at the time of the Black Death. The boundary ditches and banks are still visible today. These are within 10m of the boundary in the woodland. These would be susceptible to trampling too so again a sufficient stand off would be needed to protect them. There may be significant remains within the proposed allocation worthy of preservation.

A 132 KV pylon electricity line lies in a north south direction across both sites, turning NW-SE in the northern site. This would require a buffer of the width of the pylons plus 8m either side. It would be unlikely to be viable to bury them.

These buffers would affect the viability of the site and potential development area.

We consider this allocation unsound as unjustified. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

ST4-21 Land to the rear of Melsetta Church Road

This is a small site which is a former paddock now used as an informal extension to the back garden of Melsetta with woodland to the south. There is a very narrow access to Church Road, previously used as a private bridleway for the paddock. The visibility splay required includes trees

preventing visibility, in the ownership of a third party which would need to be taken into account if bringing this development forward. It is noted that the SHELAA considers that there is no suitable access. It is very hard to envisage how this site could be developed without the removal of the house Melsetta itself but this is outside the allocation area. Third party ownership either side of the existing access is likely to limit any widening without their cooperation.

Within this small plot, a development of a small number of houses might be possible. We note the development brief suggests up to 19 houses could be developed here. However the woodland which forms a large part of the southern part of this site, whilst not ancient woodland, is designated national habitat network by Natural England as it links 2 important ancient woodlands. It is therefore of considerable ecological value. This woodland should not be developed. This would considerably reduce the number of dwellings to approximately 5. As this site is designated green belt, if it were to be developed, then according to the Golden Rules, 50% of the housing would need to be affordable.

If access can be achieved, any housing within the former paddock should compliment the adjacent housing in Bazes Shaw, a neighbourhood of New Ash Green.

There are no footways adjacent to the highway, therefore a pedestrian access into Bazes Shaw should be considered essential for this small site.

We consider this allocation unsound as unjustified due to the proposed development within the woodland. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

ST4-26 Land at Ash Place Farm, South of Redhill Road.

We welcome the revised reduced allocation due to our comments on the Regulation 18 consultation. However this is still not sufficient and the allocation remains unacceptable.

We note the Development Brief for this site, this has clearly been prepared by the developer and it is extremely disappointed that this has not been critically analysed by SDC because there are glaring errors.

Show stopping Significant Constraints

This site was considered at a previous Regulation 18 consultation in 2019 and was discounted then. This was not only because of its scale and that the site lies within the greenbelt but because the site is not deliverable due to access problems. In their initial advice to Sevenoaks dated 4 January 2019, Kent Highways determined that a second access was needed to serve the site as well as the one proposed onto Ash Road. Hartley Bottom was not considered an appropriate place for an emergency access, let alone a second one nor is Church Road in Ash suitable. Both of these roads are a single carriageway with no passing places. The Street in Ash is unsuitable due to the road configuration, proximity of the junction with Billet hill, the sharp bend at that junction and visibility would make any access here unsafe.

The only suitable second access would be onto Redhill Road itself. However this road is bounded by a wide belt of trees owned by a third party and is not highway land. This landowner is known to be a significant objector to the development and therefore would not permit any access across its land for the development to proceed. We also note that a proposed pedestrian access including one for pushchairs and wheelchair users would also need to the cooperation of the third party owner which unlikely to be forthcoming. Therefore this site is not deliverable. It is noted that the SHELAA states that there is no highway capacity for this site. This was considered to be a severe constraint last time it was consulted upon as such to make this site not developable, it is therefore surprising that this site has not been discounted and it is assumed that this is an oversight this time.

The development brief shows a potential second access onto Hartley Bottom Road and an alternative onto Redhill Road. Both are clearly as set out above not deliverable due to the capacity of the road and land ownership restrictions.

It is highly unfortunate that Sevenoaks have not critically analysed the development brief submitted by the proposer. Two high pressure gas pipelines cross the site. These pipelines are part of the National Transmission supply and are nationally important infrastructure. The pipelines are the largest ones of 1200mm diameter and have a standard pressure of 38 bar envisaged to be upgraded to accommodate up to 70 bar pressure. The latter should be viewed as the constraint to development. The development brief suggests a 3m buffer should be adequate. This is disputed and not accepted.

It is noted that National Gas themselves have highlighted that a 12.2 m easement would prevent any development in this zone itself, however this distance should not be confused with the HSE buffers which are typically considerably more.

Large housing developments (more than 30 houses) and schools are both considered to be a Risk level 3 by HSE in their assessment of the Buffer Zone for critical infrastructure. Their advice is likely to be due to the size of the pipelines and their pressure advice of “Advise Against” for any such level 3 development within the inner and medium zones, This distance is likely to be closer to at least 50m each way from the pipeline rather than the 3m suggested (which applies to agriculture only for non high pressure pipes). This would apply to both residential development and the proposed school (including its grounds) which we note according to the development brief would be within the inner and medium zones.

Sustainability

A development of 530 homes adjoining a Local Centre and hamlet would be mostly dependent on private car to access work, leisure and education after primary level.
Any development must be in keeping with the nature and scale of the settlement and/or public transport link it adjoins. The transport assessment already notes the congestion on Ash Road at peak times and it is noted that the SHELAA states that the highway is at capacity. It is hard to see how this could be improved to what would be needed because whilst 530 houses is too large a scale in in this location it is too small a number for any meaningful upgrade to the transport network.

The Sevenoaks District own transport assessment states in paragraph 103 “The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.” However the latest Transport Assessment dated July 2026 shows that even with such mitigation, Billet Hill and Hoselands Hill will be at capacity.

As set out above, New Ash Green is not a sustainable location particularly in terms of sustainable transport as defined in policies GB7 g (iii) and TR3 1a of the NPPF in particular“ *Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are sustainable (or which can be made so, taking into account planned improvements, including any provided for as part of the development itself). This means the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical*;”

Planning Practice Guidance states "*For the purpose of these decisions, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate".* This guidance is still extant.
Sustainable transport modes are defined in the NPPF as "*Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport".* Planning Practice Guidance states "*For the purpose of these decisions, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate".*

New Ash Green has some limited employment but 58% of the working age population rely on a car to get to work. All secondary school children rely on school buses which do not permit them to stay after school for clubs or tuition or rely on a car to get them home from them. Further education pupils (16-18) rely on a car to return home. Longfield with better transport connections is 3 miles away down a steep hill. It is difficult to see how the present situation can be improved with no realistic proposals to do so in documents accompanying the plan. PPG also states "*However, in reaching these judgements, national policy is clear that authorities should consider opportunities to maximise sustainable transport solutions, as set out in paragraphs 110 and 115 of the NPPF.*
These must be realistic.

This would not be a sustainable development which would have an adverse effect on congestion, emissions, air quality and sustainable development which reduces and does not increase the need for private cars. It is therefore not justified.

Green belt and landscape character

New Ash Green was designed and built as a planned village with a structure and is self-contained. Its containment is signalled by woodland and the proposed site currently provides clear separation and settings for Ash village itself. This site is not adjacent to the urban confines of New Ash Green, being very much separated from them, in the west by the very large playing fields (an appropriate development in the green belt) an area of Greenspace and a 40 mph road, the southern bypass to the village and a substantial belt of trees. In the east, it is separated by and includes a substantial block of ancient woodland. In addition there is a substantial block of mature deciduous woodland.

Ash clearly justifies the description of the Sevenoaks District Council as "strongly performing Green Belt". The Landscape Sensitivity Assessment dated April 2017 states that the rural and low density settlement pattern outside New Ash Green and Hartley should be retained and that any new development is well integrated into the landscape. The low density settlement pattern in question is that of Ash. This development would have a significant impact on the landscape of the area and particularly a severe detrimental impact on the village of Ash.

Whilst the development is now set back from The Street and the listed church which is welcomed, this proposal is still less an extension to New Ash Green and far more, an enormous extension to the village of Ash, a small village which is washed over by the green belt designation. It would have a significant effect on its character and change it from a tranquil location to an urban settlement. Whilst previous case law states that openness is not a consideration for grey belt, the new NPPF makes it clear that it is an important consideration for green belt. Previous Footnote 55 to the 2024 NPPF cannot apply where a village is in the green belt and yet a large development is proposed adjacent to it which would compromise its boundary, urbanising its character and destroying its openness. Indeed it states in paragraph GB4 1b, that such an application would not be acceptable and should be refused

Ash is washed over by the green belt and its character does make a strong contribution to the green belt. It is rural in nature with both detached houses in their own gardens and a picturesque narrow street of terrace houses near the centre. This proposal would have a significant detrimental impact on the openness of Ash village.

ST4-26 is within a very sensitive location and its development would conflict with the guidance in the Landscape Sensitivity Assessment. This site is on higher ground and would be visible to the east to Hartley Bottom Valley and the village of Ridley beyond. This development would not integrate well into the landscape nor New Ash Green due to its separation and would swamp Ash, destroying it with its strong rural character and high levels of tranquillity within the landscape not being retained.

This development is not justified due to its impacts on green belt and the landscape character of the area.

Historic and Archaeological issues

The proposed development would have a significant effect on the setting of listed buildings in the historic core of the hamlet of Ash. We disagree with the initial appraisal carried out which assesses the effect as moderate. St Peter and St Paul's church is a grade 1 listed building. The adjacent Ash Manor is Grade 2* and the war memorial Grade 2. The composite setting of these buildings is a significant constraint which has not been properly assessed to date. This cluster of buildings must be considered together and the setting of its significance assessed. This is an important assessment that needs to be carried out. It is disappointing that the initial appraisal has not been deeper and is indeed misleading. In any case policy HE6 of the NPPF states *any* harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
In addition the NPPF states that where a development may cause substantial harm or less than substantial harm to a setting, the development should be wholly exceptional or exceptional respectively and should be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. In this case the setting of Church and Manor and around Ash Place Farm and its environs most of which are not listed including the cricket pitch but add to the setting in this location.

In addition recent archaeological excavations have revealed Mesolithic remains which are considered to be of national importance. These are very rare ditches showing evidence of significant tool making. The Mesolithic period ranges from 2500BC to 1500BC and all finds from that era are rare. The NPPF states that such remains should be considered to be of equal status to scheduled monuments. In addition there have been other finds within the site such as substantial flint scatterings to the north east and lots of even older Palaeolithic tools to the north and south and an Iron Age / early Romano enclosure suggesting the site was used for a long period of time. Therefore the proposed allocation is likely to be contrary to policy HE7 of the NPPF and its footnote 64 .and is not justified due to its impact on historic assets.

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets."

Groundwater

A groundwater source lies to the east of the site. The eastern third of the site lies in zone 1, the most sensitive designation. The Environment Agency Groundwater Protection note 3, whilst not ruling out any development in this zone, makes it difficult, since the only permitted water run off is from roof grey water. Run off from roads or other infrastructure would not be permitted, neither would SuDS.

This would have a significant effect of the viability of the development and the 530 houses do not appear to be achievable and therefore the proposal would not be effective.

Biodiversity

The site adjoins and encompasses Ancient Woodland therefore Policy BW2 applies. The NPPF also places great weight on its preservation. It states in paragraph N6 2 that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons. The exceptional example given in the footnote is the major rail proposal HS2.

Natural England guidance gives a minimum of 15m buffer to protect AW, more if there are changes to drainage, lighting, pollution which there would be in this case. The topography of the land means this will be substantial as the land drains towards it, less so to the north even more so to the southern woodland. The Woodland Trust recommends 50m where trampling may be an issue. The buffer should be natural habitat and not garden or SuDS scheme, this would significantly affect the number of houses proposed and its viability.

In addition whilst the sensitive landscape assessment recommends protection of substantial hedgerows, the hedge that runs north to south is part of the original AW. This is verified on historic mapping which shows that the woodlands were not separate and a substantial element removed within the last 50 years. This is also an irreplaceable habitat to which the Natural England guidance applies.

Loss of agricultural land.

NPPF N1 1c states that local plans should "steer *the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework. This should include …. avoiding the use of higher quality agricultural land where land of poorer quality is available*".
BMV land is defined as Grade 1,2 and 3a. It is noted that the majority of this land has been assessed as Grade 3. However the original land classification did not define 3a and 3b and moreover should NOT be used on a field by field basis. If no post 1988 survey is available then other information should be used at this stage including historical and adjacent data. This land is shown on aerial photographs on Ordnance Survey and Google earth as being used for arable crops. This land is therefore in the absence of a detailed assessment should be assumed to be BMV land.

Development proposals

The Development Brief refers to unspecified "community space" but does not elaborate on what this might be.The locality is well provided for by no fewer than 4 community halls plus at least 8 other venues all of which are rentable and have capacity for further usage, therefore an additional hall is not required.
The development includes a 2FE primary school which would be overprovision and any necessary need even if the two large housing sites are still included. This could be better met, more efficiently, by an expansion of NAG primary School.

Existing Rights of Way

The rights of way crossing the site are important routes connecting New Ash Green and Ash. They provide a popular and circular walk between the 2 settlements for recreation purposes. The NPPF paragraph 98 states that such routes should be protected and enhanced.

We consider this allocation unsound as unjustified and not effective as undeliverable. We wish to appear at the Examination in Public in order to put further points across that arise and answer any queries on our submission from the inspector.

Conclusion

Ash cum Ridley has grave concerns about the scale of development proposed in this parish.

- Whilst we understand the pressure on the authority to find sites outside the National Landscapes, there are many other places close to railway stations or with better transport links that would be more sustainable. It is notable that the Government has revised the NPPF once again, for development within a reasonable walking . distance from a railway station to be the default option. New Ash Green is more than 3km from the nearest station up a considerable incline.
- Reading the plan it is very apparent that Sevenoaks DC does not appear to understand Ash cum Ridley parish and in particular New Ash Green. It appears metaphorically and physically remote and distant from the Parish.
- It does not appear to recognise the importance of more cooperation with the local authorities to the north with which Ash cum Ridley has a closer relationship with.
- It has failed in its Duty to Cooperate with them and the rejection of the surplus housing numbers from Dartford is unfathomable.
- It has failed to take into account the unsustainable location of the area and not taken into account its own Transport Assessment which was published just days before the consultation began. Such damning conclusions of that which included modelling model shift should have necessitated a profound reassessment.
- It does not appreciate the unique nature and design of New Ash Green. It does not appear to recognise the architectural qualities of this planned architect designed village, nor the particular attributes that make it so unique. As stated in the opening paragraph there are very few places in the country like it – its managed open space, the importance of greenspace, its internal sustainable features. It has only been in recent years that the Government, local authorities, the RTPI and TCPA have started to recognise the concept of garden villages and towns – New Ash Green, the first garden village and up till recently, the only one in the country, was conceived 60 years ago.

We of course would welcome some development and have tried to offer positive comments where we can. We appreciate that we have a need for additional affordable housing and would like to work with the Authority on how best to implement this.

We consider that a Village design and consideration of our suggestion of assisting with design briefs using existing documentation and the existing expertise of the Village Association design panel (who have operated for the last 50 years) would be mutually beneficial. We consider that parts if not all of New Ash Green should be considered a Conservation Area.

Please keep the Parish Council informed of the results of these consultations. We have requested to appear at the EIP to discuss our objection to policies and the sustainability appraisal further and to answer any questions from the Inspector.