

RESPONSE FROM ASH-CUM-RIDLEY PARISH COUNCIL TO THE REGULATION 18 DRAFT OF THE SEVENOAKS LOCAL PLAN

11 December 2025

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 is clearly not, and cannot be made to be with the proposed development. 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.

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 fronts 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 is different being built from the start by a variety of developers.

Duty to cooperate and Green Belt

It is impossible to agree whether the duty to cooperate has been complied with since there is no formal DtC document published with the draft plan. But we do know some of the extent of it from previous committee and cabinet reports in 2024 and 2025. It would appear that there is good cooperation with Tonbridge and Malling, and Tandridge, but with Gravesham and Dartford, it appears limited, seemingly confined 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. DtC is an important issue when considering the merits of redefining parts of the green belt. NPPF 147 makes it clear that consideration of redefinition of the green belt is amongst other criteria dependent upon what steps have been taken by the council through the DtC 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 is, however, unclear why the work to assess functional links between housing market areas has not been done to date to make use of this offer and why the draft plan states in 1.15 "However, there are numerous barriers which may prevent neighbouring authorities from assisting with any of Sevenoaks' unmet needs" and in paragraph 1.16 says "However, given the above barriers to neighbouring authorities assisting with meeting Sevenoaks' needs, it is considered for present purposes that this Plan should seek to meet Sevenoaks' full needs".

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 Duty to Cooperate 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.

Density and Design of Development

Ash cum Ridley Parish Council welcomes the proposal in paragraph 1.28 that major development should be accompanied by social value summaries, embedding “social value into the planning process through an evidenced based and community led approach. However, given the unique features of New Ash Green, and mindful of the direction the NPPF and PPG give 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. The impact of this relatively low density is evident with insufficient space for cars in a settlement wholly dependent on private cars, encroaching on green space. 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 green space. We fail to see how policies DE3 and H7 are compatible In New Ash Green.

Sustainable locations

The NPPF paragraph 148, which is concerned with housing in the former designated Greenbelt, states that “a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework”. These paragraphs refer to sustainable locations. That is :

A) “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” ;

B) “sustainable transport modes are prioritised, taking account of the vision for the site, the type of development and its location” and

C) “any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach”

Paragraph 1.22 of the Plan confirms this position and 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. We would welcome discussion with SDC on:

- how the authority proposes to make this a sustainable location
- How the authority proposes to introduce new links in the District shown as a yellow dashed line on the key diagram given the highway network.
- 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 no moratorium and reduced subsidies on buses at KCC.

Present situation

Most buses are timetabled to run 46% of the year. (school days only). The majority of the parish, including the village of Ash, are 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) is moreover at capacity. KCC has reduced its subsidies, so it is reasonable to assume, buses cannot be expanded 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.

There are no current car sharing schemes. 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, Borough Green 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 to schools only. There is a huge dependency on private cars.

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, fewer than 1% in Ash cum Ridley use the bus to get to work (3.5% less than the national average). There is also 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.

Paragraph 1.48 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.

The housing minister recently announced the emphasis which will be placed on settlements which do have a good train service within a reasonable walking distance of it. New Ash Green is not within a reasonable walking distance of Longfield Station. It is 3 miles from it and up a steep hill.

First, development of the right quality and density around train stations enables working families to benefit from greater opportunities to live in close proximity to transport hubs – saving them time and money – alongside unlocking more opportunities for jobs, education, and sustainable growth.

That is why – as part of a revised, more rules-based National Planning Policy Framework (NPPF) – the Government intends to provide a “default yes” to suitable planning applications for development within a reasonable walking distance of well-connected stations. This will give greater certainty for housebuilders, allow development to be approved more quickly, and unlock tens of thousands of new homes during this Parliament.

This new policy will form part of the consultation on a revised NPPF by the end of the year, and will apply to land around both train and tram stations with a sufficient frequency of services. Recognising the significant benefits for jobs and growth that can be unlocked by building around train stations, these rules will extend to land within the Green Belt – continuing efforts to ensure that a policy designed in the middle of the last century is updated to work today. As with other Green Belt land, the Golden Rules would apply – ensuring higher levels of Affordable Housing, local infrastructure and green space are provided to local communities.”

Policy ST1 is not in compliance with the NPPF paragraphs 148 and 155 which is concerned with the release of Green Belt land in sustainable locations. 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, ultra low and zero emission vehicles, car sharing 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 1261 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."

Spatial Strategy

Policy ST2 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 and no reference to it in infrastructure delivery documents nor 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 and which are more sustainable, being adjacent to a railway station with frequent trains.

Landscape and Policy NE1

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 NE1 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 they 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 screened for EIA and are in the pipeline, or are already determined—and 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 where they can find greenspace, such as Shorne and Jeskyns 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 is proposed in the Harley 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

Density of housing Development

Paragraph 2.35 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 green space. Green space 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 larger 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 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. Building at 40-60 units per ha would necessitate the building of 2.5 and 3 storey houses which would not be in keeping with New Ash Green nor edge of settlement development.

The proposed density for villages of 30-40 houses per hectare, whilst still at the upper end of the scale of existing development, would be appropriate.

Housing for different ages

We agree that a variety of housing should be provided to suit different needs. The 2021 Census shows that there are considerably fewer 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 will always have some demand.

Text in a Local Plan expanding on the policies themselves is regarded as having the same weight as the policies themselves. Whilst not mentioned in the policy, paragraph 2.13 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. In a recent housing survey, there were 39 families 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 home in an area they have a strong connection with. The uplift should be split as other Affordable Housing.

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.

Employment Land

Map 3.4 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 and New Ash Green area: Ash House Business Centre, Heaver Trading Estate, Beechcroft Industrial Estate, The Manor House and Hartley Bottom Industrial Area. We agree that employment land should be safeguarded but note that two existing sites are allocated for residential use, in particular Heaver Trading Estate (NAG 4). 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

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 NAG 1 reflects that New Ash Green shopping centre has declined and is in need of rejuvenation. We consider regarding point 6 of policy TLC 1 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 mean 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 as a key land owner of land at the centre edges. We consider that some electric 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 EV charges 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. There are no proposals in the Infrastructure Delivery Plan nor in the KCC bus improvement plan. Whilst the Local Plan key diagram includes a desire for improved transport links between Ash cum Ridley and Sevenoaks, there are no proposals how that might happen given the narrow single carriageway roads in this area and indeed demand for it, considering current travel to work patterns, and the education provision in this area. 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 fewer than average 20-40 year olds (compared to national and Sevenoaks as a whole) living in Ash cum Ridley, “Active Travel” is not appropriate for an aging population.

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 piped 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 fronts 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 is the best placed to give design advice for New Ash Green area, the design panel consists of professionals such as architects and surveyors and neighbourhood residents’ associations, which input into the process. Whilst for the rest of Sevenoaks a new Community Review Panel and a Design Advisory Panel (as set out in paragraphs 5.5 and 5.8) would be a potential improvement, where there are none, it is considered that the best way to ensure good design in New Ash Green, including the maintenance of paths, play areas and green space are 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 the 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 (NAG 6) which has come forward in advance of the Plan. (This well meant intention does not bode well for future sites).

Heritage

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 locally important Scotsgrove Manor which adjoins the Chapel Wood 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 paragraph 216 of the NPPF and footnote 75 which this policy should reflect (copied here for convenience).

“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.”

It is considered that heritage 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,

We note and endorse policy HEN 6 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 NAG 1 for any proposed redevelopment of it.

Biodiversity

We note that policy BW1 seeks to assess, retain, and restore old orchards. Site NAG 7 lies on an old orchard planted 100 years ago, of considerable ecological interest. It is in need of restoration. The development proposals for this site (including the number of dwellings on this site) is in conflict with this policy.

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 BW2 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. Indeed, the hedgerow separating the orchard

from the field in NAG7 is a former strip of AW containing some notable trees and a variety of species. The hedgerow to the site, abutting North Ash Road, is also of ecological value containing at least 7 native species including holly and oak, indicating it ancient origins.

It should also be noted that White Wood, a substantial ancient woodland now only abutting NAG 9, was until at least 1954, shown on mapping as covering half of NAG 9, 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 NAG 8. Whilst the majority of this site is 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.

Infrastructure

We wholeheartedly support 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. It is proposed in Policy IN 1 that the Council should independently verify viability statements. We do not agree with this statement and believe that the Council housing department 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, presumably including cold weather initiatives which do nothing to alleviate local Affordable Housing needs in Ash cum Ridley. For example, when a recent application for housing at Ash was determined last year, the SDC housing department accepted the viability statement 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.) 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. A truly independent body should be used such as a specialist property surveyor using RICS viability advice or a District Valuer.

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 contribute to the well-being of the local community. We have concerns over the proposed redevelopment of The Royal Oak car park because this is likely to affect the viability of this facility. We consider pubs should be included in policy COM1.

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. 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 green space and other inappropriate places.

Comments on site allocations

ASH1 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.

HART7 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.

NAG1 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.

NAG2 The Royal Oak

This site is not considered to be justified. It conflicts with policy COM1. The Royal Oak is considered to be a community facility and a valuable asset in the village. It is considered that the car park is an essential element of the pub, without which the facility would be less viable.

It is considered, in addition, that the proposed development of 9 dwellings on a very small site (a density of 50-150dph) is totally incompatible and inappropriate in an edge of settlement location where the density of the neighbouring area is circa 30 dph. This is not compatible with policy H6 which is already considered too high for New Ash Green.

NAG3 New Ash Green village centre

This allocation is in 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.

NAG 4 Heaver Trading Estate

This site is not supported. The site lies outside any settlement boundary, between the villages of Ash and New Ash Green and is in the Green Belt. The intense development of 80 houses, would have far greater impact on the openness of the Green Belt than its existing use, one of whose functions is to provide a break between settlements.

The size and location of this development would have a negative impact on local services including schools, the GP practice, Darent Valley hospital and public transport, all of which have been extensively documented above. Indeed, when this site was the subject of a previous application (for fewer houses): Kent Highways expressed concern saying that the footpath from this site to New Ash Green was unsuitable and narrow. The distance of the development from bus stops, secondary schools and New Ash Green Village centre is considerably more than 800m (a distance regarded by the Planning Inspectorate as reasonable to walk along safe footpaths). We strongly disagree with the assertion at 5.4.39 of the Sustainability Appraisal that the allocation is well linked to New Ash Green.

It should be noted that a high pressure gas main runs east to west across the site, which would require a significant buffer to protect residents. According to HSE PADI advice, a medium level buffer should be applied in this case which is likely to be 50m from the pipeline. In addition, a 132 KV pyloned electricity wire runs north to south This would also require a buffer of the width of the pylons plus 8 mw each side.

Lastly, this allocation is contrary to policy EMP1 to safeguard existing employment. There are current 17 different businesses based at this site This allocation would entail the loss of local jobs and services and therefore force residents of Ash and New Ash Green to travel further for both, the very opposite of a sustainable community.

NAG5 - Grovenor, Church Road

This allocation is strongly supported for housing for older people who wish to downsize to smaller accommodation such as two 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.

We consider that given the lack of footways and narrow highway at this point, a pedestrian footway only should be provided into Caling Croft, the adjacent New Ash Green neighbourhood. 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 green space and planting, footpaths away from internal roadways and the use of some sustainable materials, and similar brick colour to that of New Ash Green (yellow not red)

NAG 6 Land West of New Ash Green

These two sites which form part of one allocation are not supported due to their scale. This allocation is currently in the Green Belt. To be considered as Grey Belt, paragraph 148 of the NPPF applies “ Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider Grey Belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework.”

The Green Belt assessment 2025 assessed these two 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, paragraph 149 requires Planning authorities in f) to “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” 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 paragraphs 110 and 115 of the NPPF in particular “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”.

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. There are limited opportunities for EV charging points currently. There are no car share schemes in operation and the nearest transport hub – 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 Green Belt 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 the footnote 55 to paragraph 153 states that openness is not a consideration for Grey Belt, it is an important consideration for Green Belt. Footnote 55 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 153, 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.

Given the size of the allocation an emergency access, if not a second access, would be necessary as well as the access onto Chapel Wood Road. The only feasible place for this is via Butcher’s Lane and/or West Yoke Road. Both of these roads are narrow single track lanes with no scope for passing bays, with substantial hedges, and unsuitable for large vehicles. This is unlikely to be acceptable to KCC highways.

Two 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.

NPPF 187b states that plans should recognise “the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”. 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, and 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 states that, where land is being allocated, the lesser graded land should be chosen instead.

The northern part of the allocation lies, adjacent on two 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 green space 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. Scotsgrove Manor was a substantial medieval manor estate that was abandoned before 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 to, so again a sufficient stand off would be needed to protect them.

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 of the site and potential development area.

NAG7 Land at Slides Farm

The majority of this site is a former orchard, the remainder being agricultural and a single dwelling. This site can be now be divided into 3. The area to the south is largely pony paddocks and a dwelling, the former farmhouse and farm buildings. The middle area is composed of substantial areas of the former orchard.

This allocation is not supported in its present form due to its proposed scale and density. A much smaller development which respects the ecological value of the site and other constraints might be acceptable. This allocation is currently in the Green Belt. To be considered as Grey Belt, paragraph 148 of the NPPF applies “ Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider Grey Belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework.”

The boundary to the north west within the field is very weak and, after development in, terms of performing well subsequently as development on the edge of a new Green Belt, it would be extremely weak. When setting new Green Belt boundaries, which is necessary when defining Grey Belt, paragraph 149 requires Planning authorities in f) to “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” If a boundary is not currently clear,(and 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 just to 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

This orchard was laid out about 100 years ago and is of considerable ecological value. This is a traditional orchard. In Kent 90% of traditional orchards have been lost since the 1950s and remaining orchards are few and far between. (Source: North Downs National Landscape). Due to their less intensive management, over time, the traditional orchard environment has developed into a specialist habitat for an abundance of flora (plants) and fauna (animals). For example the tree sparrow, spotted flycatcher and the scarce noble chafer beetle rely heavily on these orchards for survival. Orchards also provide a beneficial habitat for bumble bees.

It is essential, therefore, that this site has a phase 2 on site ecological survey before any progress with this allocation, to assess the ecological value of this site. Whilst there may be opportunities for some development in the south of the site, any development which would lead to the removal, depletion or deterioration of a highly ecologically valuable orchard, which is a priority habitat, would be contrary to policy BW2 of this plan. Ironically, this site could be the beneficiary of biodiversity net gain, rather than a contributor of units to it.

The site also adjoins ancient woodland, and is separated by a narrow highway by a second to the south. To the east is deciduous woodland adjoining more ancient woodland. This piecemeal ancient woodland is very typical of this North Downs landscape, and often the hedges linking the parcels are of considerable ecological value, as they are in this area, particularly separating the field from the orchard.

Part of Nine Horse Wood lies within the site boundary. There should be no development which would see the removal or deterioration of the ancient woodland which is an irreplaceable habitat. Sufficient margin should be left to protect all of this habitat. A minimum 15-metre buffer is the minimum acceptable standoff for ancient woodlands. However, the buffer may need to be increased, potentially to 50 metre, where pollution (e.g., construction runoff) and trampling are potential issues. In this case trampling may be a significant issue if insufficient green space is allocated. A buffer should not typically contain new buildings, services, or Sustainable Drainage Systems (SuDS) and should be comprised of semi-natural habitat.

The southern boundary hedge is also of high ecological value, containing notable native trees such as holly, oak, hazel, field maple, beech and hawthorn. This is unsurprising since North Ash Road is very narrow here and Spring Cross Wood, which is ancient woodland, is just a few metres away on the other side of the highway. This would have a significant impact on any required visibility splay, which are currently non existent, due to the highway configuration, and may make development impossible since this hedgeline should be considered ancient woodland.

As stated above, the road here is very narrow with no footways. The internal New Ash Green footpaths for Spring Cross neighbourhood here are away from the highway. The neighbourhood of Capelands lies adjacent to the site. Pedestrian footways from the limited

housing, that might be possible here within unconstrained areas would be essential, into Capelands to achieve integration with the rest of the community.

Any possible, small scale development should be designed to be compatible with the adjacent settlement of New Ash Green. A design brief should be made available. Pedestrian footways should front housing with vehicular access to the rear. There should be well managed community green space between rows of housing, which should be a mix of smaller and family homes of no more than two storeys. Flats or higher rise buildings would not be acceptable. Because this site is within the Green Belt, any possible housing should be built to include 50% Affordable Housing and green infrastructure, which could include the orchard area.

The field is almost entirely underlain by the zone 1 of the Hartley Bottom public water supply. This is an important aquifer serving a large population. Whilst grey water from roof run off is permitted in such a zone, run off from highways, where vehicles may be parked is not, thereby preventing any development in this area.

NAG 8 - 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. 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 two important ancient woodlands. It is, therefore, of considerable ecological value. This woodland should not be developed, including any vehicle access or enhancement of the existing rear footways. 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 complement 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.

NAG 9 Land at Ash Place Farm, South of Redhill Road.

This site was considered at a previous Regulation 18 consultation a few years ago and was discounted then. This was not only because of its scale and that the site lies within the Green Belt, but because the site is not deliverable due to access problems. Kent Highways determined that a second accessory 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 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 on 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. 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.

A development of 580 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 580 houses is too large a scale 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.”

As set out above, New Ash Green is not a sustainable location, particularly in terms of sustainable transport, as defined in paragraphs 110 and 115 of the NPPF in particular “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”.

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. There are limited opportunities for EV charging points currently. There are no car share schemes in operation and the nearest transport hub - Longfield with better transport connections is

three 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 green space and a 40 mph road, the southern bypass to the village. 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. This proposal is 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.

Paragraph 150 of the NPPF states “If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. 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 terraced houses near the centre. Whilst the footnote 55 to paragraph 153 states that openness is not a consideration for Grey Belt, it is an important consideration for Green Belt. Footnote 55 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 153, that such an application would not be acceptable and should be refused.

This proposal would have a significant detrimental impact on the openness of Ash village.

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 should be 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.

NAG09 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 tranquility 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 misleading. In any case, paragraph 94 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 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 paragraph 216 of the NPPF and its footnote 7 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."

Utilities and Groundwater

Those recent excavations were for a high pressure gas main which runs close to the southern boundary of the site. According to HSE PADI advice a medium level buffer

should be applied, in this case, which is likely to be 50m from the pipeline. This would apply to residential development and Use Class E development.

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 580 houses does 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 193c 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, or 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 was removed within the last 70 years. This is also an irreplaceable habitat to which the Natural England guidance applies.

Loss of agricultural land.

The appraisal by Sevenoaks District Council of site states that the land is grade 3.. That said, pre 1988 agricultural grading is not suitable at a field based level. In addition, grade 3 is not defined to 3a and 3b, the former being considered best and most versatile. However, the majority of the site has been in constant crop rotation arable production for 50 years and may well constitute Best and Most versatile land, notwithstanding that some may be geologically clay with flints. The NPPF states in paragraph 187 that authorities should enhance the natural environment by recognising the benefits of BMV land and protect soils, including their economic value.

Development proposals

The locality is well provided for by no fewer than 4 community halls plus at least eight other venues, all of which are rentable and have capacity for further usage, therefore an additional hall is not required.

Existing Rights of Way

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

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 proposes to revise the NPPF once again, for development within a reasonable walking distance from a railway station to be the default option.

- 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 Districts to the north with which Ash cum Ridley has a closer relationship.
- 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 has optimistically added (seemingly as an afterthought) a desire to improve links to Sevenoaks with no appreciation of the transport network to it, or indeed its need.
- 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 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, which sadly do not, and have never, included its transport links to other places (though the public transport system is now far worse than it was 30 years ago). 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 until 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.

Name and Address, Email and Contact Number

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