

**RESPONSE FROM NEW ASH GREEN VILLAGE ASSOCIATION  
LIMITED (NAGVAL) TO THE REGULATION 18 DRAFT OF THE  
SEVENOAKS LOCAL PLAN**

**10 December 2025**

**39 Response Forms are included in this document.**

# Sevenoaks District Local Plan

## Regulation 18 - Comments Form

Consultation Period: 23<sup>rd</sup> October – 11<sup>th</sup> December 2025

Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Policy ST2 (Housing and Mixed-Use Site Allocations)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL understands that the Government has placed Sevenoaks District in an invidious position because of the new standardised assessment methodology for assessing housing need. However, we strongly believe that the resulting pressure for new housing must be more evenly distributed throughout the District. It cannot reasonably be forced upon locations that are, for many reasons, unsustainable and which will not offer an acceptable sustainable lifestyle for new residents.

Of the 11,443 homes within the sites proposed for allocation in addition to the 72 with extant planning permission, 1,189 are in or adjacent to New Ash Green. This is more than 10% of the total allocation for Sevenoaks District in a community of 6,069 people, just 5% of the District's population. When account is taken of the low settlement hierarchy score for New Ash Green's sustainability, and the errors made when assessing that score which we detail elsewhere in our comments on the Sustainability Assessment, the unique historic design, and the poor facilities and connectivity, it is obvious that the village cannot support the provision of more than a third of that number of allocated sites at best. The increase of 1,261 homes is completely out of proportion to the other two communities defined as Primary Service Settlements, which have a higher settlement hierarchy score than New Ash Green's questionable score of 90. Hartley has a score of 148 and is allocated 234 homes while Otford, with a score of 98 has only 157 homes allocated. Even Westerham, which is exceptionally classed as a town with a score of 126, has allocated sites for a mere 37 homes.

It is unfortunate that, despite the aspiration of paragraph 5.17 of the Local Plan document, development briefs are not available for majority of the proposed sites in the vicinity of New Ash Green. Their availability at this stage would have been very helpful in assessing the merits of each site and in their absence, NAGVAL has no option but to record our objections to many of them. If more detail had been provided to show how development could be controlled, designed and integrated into the landscape and management structure of New Ash Green, it might have been possible to offer a more considered opinion.

The reference at 5.4.41 of the Sustainability Appraisal of the Local Plan to a ‘high growth strategy’ for New Ash Green ignores the many constraints imposed by its location, remote from the majority of facilities with the exception of the limited number within a 1,200 metre radius of the potential development sites. Many of these existing facilities could not serve any significant population increase without major upgrading, while roads and public transport would not be able to provide convenient opportunities to travel to alternative, more distant facilities.

Figure 2 in the 2025 Settlement Hierarchy document does nothing to introduce the claimed ‘accessibility’ credentials of New Ash Green. Conversely, it supports our contention that New Ash Green is poorly connected – no roads worth showing, limited bus services, a railway station beyond reasonable walking distance, no major supermarket and few useful shops, a single (oversubscribed) primary school and a doctors’ surgery which cannot cope with existing demand.

NAGVAL believes that, for understandable reasons of attempting to meet the Government’s target, development sites have been included in the draft Local Plan, mainly because they have been suggested by their owners rather than for their suitability. However, we contend that site allocations must take more account of local need as well as sustainability. Otherwise, the outcome will be the construction of unsuitable homes that are in the wrong places and which are only attractive to a limited number of people, so they will not address the housing needs of the District as a whole.

NAGVAL is aware of the need for Sevenoaks District Council to aim to meet the Government’s housing target. However, we believe that the draft Local Plan is placing an unacceptable and disproportionate burden on the community of New Ash Green. We do not accept that the ‘strategic context’ justifies imposing a high growth scenario on a settlement which is not equipped to deal with it. Development of all the sites which it is claimed are supported by the SHELAA would stretch local infrastructure beyond its breaking point and have major financial and practical implications for the existing population so please see our comments on the Infrastructure Delivery Plan.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure.

Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District’s housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

No.

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# Sevenoaks District Local Plan

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Consultation Period: 23<sup>rd</sup> October – 11<sup>th</sup> December 2025

Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Policy H1 (Housing Mix)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL supports the premise that a mix of homes of different sizes and types is essential. New Ash Green was created with that principle in mind, and it remains a good example of a community that has a wide range of housing, something that is evidenced by the second or even third generations of families living in the village.

It is accepted that because of high house prices it is very difficult for first time buyers and young families to remain in the District (page 19 of the Local Plan). This means that it is vitally important for new housing provision to be at the lowest end of the price range. In New Ash Green, despite the original intention to provide a wide range of housing sizes, there has been a slow but steady trend towards the extension of properties to cope with growing families and therefore the mix of the existing stock has shifted towards larger houses. Recent permissions for the conversion of offices and shops into small apartments has helped to reverse this trend but it is only minimal.

Nevertheless, it is important to note that the cost of housing in New Ash Green is significantly lower than the average for Sevenoaks. At the time of writing there were 21 homes for sale in New Ash Green, all of them below the average price for houses in Sevenoaks District and 6 were less than half of that average price. Similarly, of the 24 advertised rental properties, 13 were below the average monthly rent for the District. In order to retain the housing balance and counter the trend of extending small houses, NAGVAL believes that any new housing permitted should be affordable and suitable for first time buyers or designed as smaller homes-for-life to allow older people to downsize and release larger homes for growing families.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

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1. Please specify the **policy or site** to which your comments relate:

**Policy H2 (Provision of Affordable Housing)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

Subject to our views on Policy H1, the need for a housing mix to support people entering the housing market and to provide for downsizing from family homes, NAGVAL supports the emphasis on affordable housing. Any new housing should be designed to help people to acquire the homes they need, whether through outright purchase or shared ownership or by renting property.

We draw attention to the need for social housing providers on new developments to adopt the covenants that apply throughout New Ash Green. This will ensure that the common services and facilities, which are provided by NAGVAL and neighbourhoods, are available to their residents and are fully funded. This principle applies at present to existing properties in the village that were developed as social housing and to those subsequently acquired by social housing providers.

However as can be seen in the Targeted Review of Local Housing Needs (Map 2.1), New Ash Green already has a predominance of smaller homes so there is less market failure than in the majority of the District. Development of affordable housing must be concentrated in the parts of the District where the highest property prices prevent the people who are most in need of homes that they can afford from entering the housing market. Those people are most likely to have to travel to employment or for education but the inconvenient location of New Ash Green and the unsustainable road and transport infrastructure means that they would not be able to do so. It is important to note that the cost of housing in New Ash Green is significantly lower than the average for Sevenoaks. At the time of writing there were 21 homes for sale in New Ash Green, all of them below the average price for houses in Sevenoaks District and 6 were less than half of that average price. Similarly, of the 24 advertised rental properties, 13 were below the average monthly rent for the District.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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4. Are you aware of any additional sites which we have not yet considered?

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**Policy H3 (Housing in Rural Areas)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL notes that the great majority of sites around New Ash Green where housing is proposed lie in the Green Belt outside the urban confines of the settlement. We have argued elsewhere that 'grey belt' designation cannot be supported by the NPPF. We accept that in some limited circumstances there will be opportunities for some of these sites that would not normally be suitable for development, because of planning policy constraints, to be developed solely for housing to meet local needs.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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1. Please specify the **policy or site** to which your comments relate:

**Policy H4 (Housing for Older People)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL has drawn attention in our comments on Policy H1 which say that any Housing developments around New Ash Green must have a particular focus on the provision of housing suitable for people to downsize from family homes. Policy H4 is therefore supported but with the important caveat that New Ash Green is not a “sustainably located and well-connected” area of the District, so the market for such homes is likely to be limited to people who already have links to the area, through nearby family or who do not want to sever existing social ties to the village. New Ash Green is not, in general, a suitable or sustainable location for older people to relocate to unless they have those established links, so it should not be assumed that such housing would be attractive to people from the wider District.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

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1. Please specify the **policy or site** to which your comments relate:

**Policy H5 (Build to Rent)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL agrees that proposals for Build to Rent schemes should be within the built-up areas of Sevenoaks, Swanley and Edenbridge because they are sustainably located and well-connected areas of the District, where there is easy access to shops, community facilities and public transport. New Ash Green does not meet that criterion so is unsuitable for Build to Rent except in the very limited circumstances of a small number of homes suitable for mobile professionals or local essential workers on any larger developments.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

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1. Please specify the **policy or site** to which your comments relate:

**Policy H6 Smaller Sites)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

This policy is reasonable in appropriate locations, but NAGVAL fails to see how it can be applied to the sites of less than 1ha in the vicinity of New Ash Green. In particular, it is not feasible for the proposed sites to contribute to healthy spaces with improved connectivity and, in at least one case (NAG1), a vital employment and retail use would be lost.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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1. Please specify the **policy or site** to which your comments relate:

**Policy H7 (Housing Density and Intensification)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

New Ash Green does not meet the requirements for higher density development. High density housing would be very detrimental to local character and amenity, not least because it is unlikely to provide any financial support for the extensive community facilities managed by NAGVAL. New Ash Green is not a transport hub. The nearest railway station is at least a 30-minute walk. The infrequent bus service only serves a limited number of destinations while interchange with trains at Longfield station is impracticable. Work, education, retail and leisure opportunities within 15 minutes by sustainable transport modes are restricted and only suitable for a minority of purposes, leading to a heavy reliance on private car use.

3. In reference to Policy ST1, which is your preferred option?

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**Policy H8 (Self-build and Custom Housebuilding)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

Self-build and Custom Housebuilding is only likely to be suitable for developments that are proposed as extensions to New Ash Green if they conform fully with the criteria in this policy and if they comply with the covenants that apply to all property in New Ash Green which provide for financial contributions to the community facilities provided by NAGVAL and allow NAGVAL's Amenity Committee to approve the design and subsequent alterations of properties.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

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# Sevenoaks District Local Plan

## Regulation 18 - Comments Form

Consultation Period: 23<sup>rd</sup> October – 11<sup>th</sup> December 2025

Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Policy EMP1 (Delivering Economic Success)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL has noted with concern the trend towards the loss of employment opportunities in and close to New Ash Green so we fully support the policy of safeguarding and optimising existing employment land, particularly with reference to the regeneration of the village centre (NAG3) and the proposed expansion of Beechcroft Farm Industries (ASH1). We therefore do not support the reallocation of the existing employment and retail sites of NAG1 and NAG4 for wholly residential use or any other uses which would undermine or diminish their role and function as employment land.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

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Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Policy EMP2 (New Employment Land)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

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3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

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Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Policy TLC1 (Resilient Town and Local Centres)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL strongly supports the regeneration of New Ash Green village centre as a local service centre with the addition of suitable additional retail and service outlets which will meet the needs of the surrounding communities. However, we submit that, if any housing development sites for more than 100 units are included in the Local Plan, they must not include small-scale convenience retail units because we do not consider that these would be viable; they would, instead, detract from the viability of businesses in the village centre. Such requirements must not be included in the development briefs for any of those sites.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Policy NAG1 (New Ash Green Village Centre)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL welcomes and strongly supports the vision for the regeneration of New Ash Green Village Centre in accordance with the 2022 Town Centres Strategy. In addition, we suggest that the policy should ensure that sufficient car parking is provided to serve the businesses in the centre as well as community amenities, including the primary school, youth centre, medical facilities, library, village hall and the needs of residents living in the centre. This is important to protect and enhance the vitality of the centre because we believe that the relatively isolated location of New Ash Green will never reduce the use of cars as the main means of transport, whenever walking is not feasible.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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# Sevenoaks District Local Plan

## Regulation 18 - Comments Form

Consultation Period: 23<sup>rd</sup> October – 11<sup>th</sup> December 2025

Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Policy CC3 (Low Carbon and Renewable Energy)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL supports this policy and particularly the emphasis on prevention of adverse impacts on natural and built environments, the amenity of surrounding development and highways as well as avoiding the use of the best and most versatile agricultural land, where we support the comments of Ash-cum-Ridley Parish Council.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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1. Please specify the **policy or site** to which your comments relate:

**Policy CC4 (Tree Planting)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL supports this policy and draw attention, in relation to any developments adjacent to New Ash Green, to the experienced workforce already employed by NAGVAL which manages the woodland within and around New Ash Green. We submit that such developments should enter into agreements with NAGVAL for the use of this workforce to ensure that funding and maintenance standards remain consistent. The development briefs for all these sites should reflect this opportunity to fully integrate any developments into the founding principles of New Ash Green.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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1. Please specify the **policy or site** to which your comments relate:

**Policy DE1 (Community Review Panel)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL submits that in New Ash Green, design matters more than in most of the District because the genesis of New Ash Green and its unique design features would be seriously compromised by any new development which failed to embrace the same principles. During the almost 60 years since New Ash Green emerged as a unique vision of a garden village in the countryside, those design features have been protected by NAGVAL's Amenity Committee which was established to safeguard the principles established by its architect, Eric Lyons. That Committee mirrors many of the functions envisaged for the Community Review Panel and it will be important for applicants to demonstrate that the views of either or both of the Community Review Panel and the Amenity Committee have been incorporated into their schemes, including provision for the continuation of their input to future changes.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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1. Please specify the **policy or site** to which your comments relate:

**Policy DE2 (Design Advisory Panel)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

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3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

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1. Please specify the **policy or site** to which your comments relate:

**Policy DE3 (Ensuring Design Quality)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL supports this policy and recommends that, because of the unique design features of New Ash Green which reflect the original ambitions of its founder and architect, Eric Lyons, the New Ash Green Design Guidance document should be added to the list of documents that must be considered when preparing a Design and Access Statement for planning applications that would have an impact on New Ash Green.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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1. Please specify the **policy or site** to which your comments relate:

**Policy HEN1 (Protecting and Enhancing the Historic Environment)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL considers that whilst New Ash Green is not an *historical* settlement in the sense of old, it is nevertheless an *historic* development of a garden village concept which relies heavily on its countryside setting and unique design features due to its place in the history of town planning and the involvement of SPAN in its design and construction with the unique management system that has protected the development up to now. It provides a model of how new housing development can be integrated successfully into a rural environment. New Ash Green must therefore be defined as a non-designated heritage asset and is a clear candidate for conservation area designation with a full assessment of the potential for designation and its implications included in the Local Plan. Consequently, any proposals which would affect the local character and distinctiveness of New Ash Green should be assessed for their positive and sensitive contribution to the historic development principles of the village.

This principle was recognised in the 2017 Green Belt Assessment which notes that for the definition of historic towns in Sevenoaks District, “New Ash Green was considered in the assessment due to its unique historical identity (largely intact) as a prototype for a new way of living from the 1960s onwards. The neighbourhoods in New Ash Green are designed along ‘Radburn’ lines, separating roads from pedestrian paths. As well as housing, the village’s public and county buildings include a shopping centre, offices, community centre, church, library, clinic and primary school.” The 2025 Green Belt Assessment reiterates the categorisation of New Ash Green as an historic settlement; we have explained why we consider that this disqualifies the surrounding land from definition as ‘grey belt’ and suitable for development.

Consequently, it is important to ensure that the setting of the village in the countryside, as envisaged by its architect, Eric Lyons, in the 1960s, is preserved. It was noted that in the immediate vicinity of New Ash Green, the Green Belt protects the wider setting of the historic settlement. The 2025 Green Belt Assessment reiterates the categorisation of New Ash Green as an historic settlement; we have explained why we consider that this disqualifies the surrounding land from definition as ‘grey belt’ and suitable for development.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

No.

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**Yes** / ~~No~~ (Please delete as appropriate)

Please give your: **Name and Address, Email and Contact Number** and those of your Agent (if you have appointed one to act on your behalf). If you live in the District, please also note which Parish you live in.

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01474 872691  
  
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# Sevenoaks District Local Plan

## Regulation 18 - Comments Form

Consultation Period: 23<sup>rd</sup> October – 11<sup>th</sup> December 2025

Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Policy IN1 (Infrastructure Delivery)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL strongly supports this policy, pointing out that New Ash Green, whilst designed as a self-sufficient community, has only achieved that objective to a limited extent because events outside the control of the original developers prevented the provision of some of the intended facilities, and further housing beyond that envisaged in the Master Plan has overstretched some of the facilities. Much of the infrastructure now struggles to cope with the needs of its current population. New development in the vicinity of New Ash Green must therefore ensure that the critical needs of affordable housing, education, health and transport are not compromised for the existing residents of the area and that adequate provision is ensured for incoming residents.

Any new development must bear its share of improvements, upgrading and maintenance of local infrastructure, including that belonging to NAGVAL as detailed in our comments on the Infrastructure Delivery Plan which must be substantially enhanced before the Reg.19 consultation.

These obligations on developers are, typically, secured through Section 106 agreements. Whilst this sometimes works in practice, we are aware of instances where a developer has failed to implement its obligations but has then argued that the required facilities were not viable and successfully applied for planning permission to use the allocated site for further housing. This happened, for example, in Dunton Green where the promised GP surgery was never delivered because it was claimed that no-one could be found to operate it. We therefore suggest that any Section 106 agreements should require the necessary facilities to be provided **before** the associated housing is completed and subsequently maintained for a long enough period to become established. This latter point is important for the provision of new public transport services which often have to run for several years before people's habits become sufficiently entrenched to make them viable.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

No.

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1. Please specify the **policy or site** to which your comments relate:

**Policy SL1 (Sports and Leisure Facilities)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL draws attention to its unique role in providing most of the sports and leisure facilities in New Ash Green. These facilities are funded by residents of the existing village who are required, through the restrictive covenants in the deeds of their homes, to pay an annual contribution to NAGVAL for their upkeep. It will be important, if there is any further housing development in the area, for the same funding mechanism to be incorporated so that the present residents of New Ash Green do not have to subsidise the provision and any necessary improvements of facilities for the residents of the new housing.

This must be included in any development briefs for sites that are included in the Local Plan.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure.

Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

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1. Please specify the **policy or site** to which your comments relate:

**Policy COM2 (Allocations for Community Use)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL strongly objects to any proposals for the mixed use development of site NAG9. It was previously determined to be unsuitable for development and that conclusion is still applicable because of the constraints of historic environment (adjacent listed buildings as well as the need to protect the historic concept of New Ash Green) as conceived and implemented by SPAN, its biodiversity and landscape sensitivities.

We note that for the purposes of the Green Belt/grey belt assessment, the 'service settlements' across the District are considered to have the same status as towns, and therefore Purpose B of the Green Belt (*To prevent neighbouring towns merging into one another*) must be taken into consideration for deciding whether development would result in the merging of New Ash Green and Hartley. The 2017 Green Belt Assessment identified the environs of New Ash Green and Hartley as meeting Purpose B and this assessment remains unchanged.

Purpose A (*To check unrestricted sprawl of large built-up areas*) is also important because New Ash Green and Hartley, together with Longfield, form the largest built-up area in the north-east quadrant of Sevenoaks District, with a combined population of over 16,000 – only 1,000 less than Swanley; the surrounding Green Belt therefore serves this purpose when the villages are taken together.

The 2017 Green Belt Assessment included New Ash Green in its definition of 'historic towns' because of its unique historical identity, so the adjacent Green Belt is vital in presenting that identity and fulfils Purpose D (*To preserve the setting and special character of historic towns*). Along with the poor sustainability score attributed to New Ash Green, there is no justification for classifying the nearby Green Belt as 'grey belt' that is suitable for development. It clearly meets the primary purposes of the Green Belt, by keeping land permanently open and preventing the unrestricted growth of the large combined built-up area of New Ash Green and adjacent settlements. Neither is there any evidence whatsoever of any existing need for the 'exceptional circumstances' required to support the allocation of Green Belt land for residential use or other inappropriate development the Local Plan.

We argue, firstly, that there are plainly defined boundaries for New Ash Green and this situation is one that both the Ash and Hartley Parish Councils are anxious to retain. Indeed, there is a long history of litigation between the Village Association, Parish Councils and Bovis over the latter's proposal to develop Northfield on the northern edge of New Ash Green which would have destroyed the open space between New Ash Green and Hartley. This resulted in the rejection of any

Secondly, we wish to stress that site NAG9 does **not** fall within any part of the clearly defined boundary of New Ash Green – the postal address of the site being **Ash Place Farm, Church Road, Ash, Sevenoaks, TN15 7HD**. This is erroneous information which is now out in the public domain and is misleading and confusing. The limits of the village of New Ash Green are defined by the agreement dated 29<sup>th</sup> September 1967 between Span Kent Limited and the Village Association.

#### Protection of the Green Belt

The particular area in question is valued as open, agricultural landscape and is clearly defined by a thick tree belt which helps to define the outer limit of the built-up area of New Ash Green and protects the very special landscape character of the village of Ash and its countryside.

Historically, we must also do everything we can to maintain and preserve the setting of the listed Ash Church and the Manor House; the Church having been there since at least as early as 1286. We therefore believe that there is no significant justification that warrants the ‘exceptional circumstances’ which would be necessary to release this land from the Green Belt. We wish to state in the strongest possible terms that the land must not be given any allocation in the Local Plan for housing or other inappropriate development. NAGVAL supports the Council’s commitment to protect its Green Belt, even though it may mean that there will be less available land within the District than would be required to meet the need for housing as calculated by the Government. Kent is not called the Garden of England for nothing and this must be maintained. The Green Belt is tightly drawn around New Ash Green to ensure that it remains distinct. Purposes A and D of the Green Belt are therefore obviously important in the immediate environs of the historic garden village of New Ash Green and therefore the classification of the surrounding land as ‘grey belt’ is wrong. Furthermore, purposes B and C relate to the need to maintain the separation between New Ash Green and Ash and to safeguard the surrounding countryside from encroachment. The strong contribution that site NAG9 makes to the relevant purposes of the Green Belt means that it cannot be classified as ‘grey belt’.

The site is clearly representative of the ‘Ash-cum-Ridley Settled Downs’ landscape character area, falling within the Hartley/New Ash Green East sensitivity assessment area where higher levels of sensitivity to built development are indicated. Here the 2017 Landscape Sensitivity Study by LUC recognises the attractive, highly rural setting to the villages, with few human influences and many characteristic rural features including mature broadleaved woodland, thick hedgerows and traditional buildings. This part of the area is specifically noted as retaining the separation between the larger settlement of New Ash Green and the smaller villages of Ash and Ridley, which are different in both scale and form. The resultant guidance points to the ‘absolute constraints’ to development formed by the frequent areas of ancient woodland and says that any new development should retain the rural and low-density settlement pattern, the strong rural character and high levels of tranquillity and avoid siting development on prominent slopes or in highly visible areas. The proposed development of an estate of up to 580 dwellings and other urban uses would be in direct conflict with this guidance.

The 2017 Green Belt Assessment notes that for the definition of ‘historic towns in Sevenoaks District, “New Ash Green was considered in the assessment due to its unique historical identity (largely intact) as a prototype for a new way of living from the 1960s onwards. The neighbourhoods in New Ash Green are designed along ‘Radburn’ lines, separating roads from pedestrian paths. As

well as housing, the village's public and county buildings include a shopping centre, offices community centre, church, library, clinic and primary school." The 2025 Green Belt Assessment reiterates the categorisation of New Ash Green as an historic settlement; we have explained why we consider that this disqualifies the surrounding land from definition as 'grey belt' and suitable for development.

Consequently, it is important to ensure that the setting of the village in the countryside, as envisaged by its architect, Eric Lyons, in the 1960s, is preserved. It was noted that in the immediate vicinity of New Ash Green, the Green Belt protects the wider setting of the historic settlement. Again, development of Ash Place Farm would completely negate that purpose of the Green Belt as well as that of preventing encroachment of the developed area into the countryside.

The unique self-contained community, which forms the largest densely built-up area in the northeast of the District, must be protected from unrestricted sprawl beyond its clearly defined boundaries. The Green Belt is tightly drawn around the village to ensure that it remains distinct. Purposes A and D of the Green Belt are obviously important for maintaining the character and historic precedent of the development of the historic garden village of New Ash Green. Therefore the classification of the surrounding land as 'grey belt' cannot be justified within the terms of the NPPF.

#### Healthcare Provision

The Jubilee Medical Group, which has surgeries in New Ash Green and Longfield, is stretched already and this practice has had to deal with the extra work resulting from increases in healthcare requirements from care homes, nursing care as well as care in the community and increased patient care resulting from secondary services and these extra requirements together with the increased housing already in Longfield and Hartley have stretched the local practice to breaking point. We understand that the Group has stated publicly that it is unlikely they would have the necessary resources or capacity to take on additional residents as patients. Should any proposal for development be included in the Local Plan, it is difficult to imagine how adequate health provision could be provided for existing patients, never mind an extra 2,000 or more. This would also be exacerbated by the national shortage of doctors willing to go into local general practice. However, economies of scale dictate that it would be preferable, if new facilities have to be provided, to extend the existing New Ash Green surgery. The other surgeries in the wider area, in Meopham, West Kingsdown and Farningham, are inconveniently located, well beyond walking distance with no public transport links, and most would be unable to accept additional patients. The Longfield surgery of the Jubilee Medical Group is not easily accessible by public transport and is on a very constrained site so it could not be expanded. Darent Valley Hospital is already under severe pressure which can only get worse when the Ebbsfleet development of some 14,000 homes gathers momentum. Car parking at the hospital is inadequate for current needs and traffic queues can delay people trying to reach appointments while the five buses on weekdays are rarely convenient for appointment times.

#### Highways and Transport

New Ash Green is largely a commuter village with many residents already travelling out of the area to work. Any proposal to build on this land would have a serious impact on road travel and the rail

services, not to mention the additional parking problems that would be inevitable. A substantial amount of new development on the site would add to existing traffic congestion which has increased over the years and is already rendering Ash Road, being the main through road to Longfield, very busy and at sometimes it is at a standstill. The road leading south to the A20 from Ash, New Ash Green, Hartley and Longfield is already in difficulty as the current use of satellite navigation results in huge articulated HGVs driving through what amounts to be a country road, single-track in places with very few passing points suitable for large vehicles, to get to Longfield and through to the M2 and the Dartford Tunnel. The direct route from this area eastwards towards south London would involve the use of the single-track roads of Billet Hill and beyond which are already heavily congested at peak times. Since the advent of Bluewater, the villages of Ash, New Ash Green and Hartley have already seen an increase in traffic because of people cutting through the country lanes to get from the M20, M25, A20 to Bluewater. Unless there is a substantial improvement to all these access roads there will be an unacceptable strain to the already inadequate road system. We would also question who would pay for an improved road system should these proposals go through because it would be beyond the resources of any developer. Councils are already cash strapped and road repairs are not considered a priority. To provide better road facilities would also require costs relating to acquiring land and we believe the money would be better used to improve the strategic road network so that local roads through residential areas are not used by through traffic. Safe and convenient access to the site would be impossible. It is inappropriate for a development of the size indicated, for housing and other uses, to be served by a single vehicular access which would inevitably create a dangerous junction where it meets Ash Road in close proximity to other accesses to existing and proposed developments at Meadow Farm/Heaver Trading Estate and Oast House Nursery. No other possibilities exist for alternative access points because Hartley Bottom Road and Church Road are single-track lanes and the site would be unable to link to Redhill Road because the intervening land is owned by NAGVAL and would not be made available.

Pedestrian access to shops, sports facilities and the existing educational establishments in New Ash Green would be along muddy woodland paths, unlit at night, which many people would be reluctant to use for security and practical reasons so cars would be the main method of transport even for short, local journeys, contrary to the basic design principles of New Ash Green which encourage walking.

Traffic and access issues must therefore be considered as a fundamental objection to this proposed development.

### Educational Provision

It should be noted that the latest Ofsted reports for Hartley Primary Academy and Milestone Academy give both as being 'Outstanding' and 'Good' for New Ash Green Primary School. We have been unable to identify anything in these reports which indicates that the schools are suffering from a lack of facilities and evidence previously provided by the education authority in respect of proposed housing allocations in the area confirmed that the existing primary school provision in the locality is adequate for current needs. New Ash Green Primary School is currently oversubscribed but it was designed for a larger number of pupils than it currently serves and could easily be expanded if necessary either in the existing accommodation or by extending within the extensive grounds without the necessity for the additional overheads of providing a new school in close proximity.



### Impact on New Ash Green

New Ash Green has a unique management structure with many of the facilities that local government would normally provide being owned and maintained by the Village Association. These include all footpaths outside the village centre, street and path lighting, playgrounds, extensive areas of public amenity space including ancient woodlands, and community facilities such as the village hall, sports field and pavilion. The finance for this is provided through restrictive covenants attached to all homes in the village which require residents to pay an annual contribution to the Village Association in return for the right to use its facilities. This contribution represents the greatest part of the Association's income and must be preserved for the benefit of future residents. Given that the occupants of any developments built on this land would inevitably enjoy the use of the Village Association's facilities, there would be no mechanism for them to contribute a fair share towards the cost of providing the facilities. This additional use would increase maintenance costs and place an intolerable burden on existing New Ash Green residents who would be forced to subsidise the new occupants without any means of recompense.

It is accepted that New Ash Green village centre has been struggling because of poor management, lack of investment and changing shopping habits. The inclusion of retail food or office establishments in any development of site NAG9 would have a serious detrimental effect on the viability of the existing businesses in New Ash Green. Industrial or research uses would be better sited on the existing trading estates, including Beechcroft Farm (ASH1) where expansion is proposed. There are at least six community buildings available for use by villagers and there is no need for any more facilities of this nature which would be likely to add to the administrative difficulties already experienced in finding volunteers to manage the various properties.

NAGVAL does not believe that there are any significant exceptional circumstances or social and community benefits to justify the release of this Grade 3 agricultural land in the Green Belt for development. We do not understand the classification of part of the site as 'Other' or 'Urban'. Apart from the area of ancient woodland. Any development on this site would be an unnatural extension to the urban confines of New Ash Green.

The statement at 5.2.55 in the Sustainability Appraisal of the Local Plan, "New Ash Green ... has quite low historic environment constraint, ... being a 20th century new settlement" fails to recognise the historic precedent of a planned "garden village" integrated in its countryside setting.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

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1. Please specify the **policy or site** to which your comments relate:

**Connectivity**

2. Do you have any comments on or suggested changes to the proposed policy/site?

The map on page 22 of the Local Plan clearly shows that New Ash Green has very poor connectivity as it is well away from any major roads. The minor roads to the west, south and east are only single-track while the only wider road northwards through Hartley and Longfield is often congested and all the roads beyond Longfield (Main Road (in both directions), Whitehill Road and New Barn Road) are of substandard width in places leading to hazardous encounters with HGVs and buses. There is no dispute over the fact that Ash Road through Hartley is inadequate for the amount of traffic it carries and that a further Transport Assessment is necessary to show how it would need to be improved to carry the extra traffic from the proposed housing around New Ash Green. There must be adequate consultation on this before the Local Plan reaches the Reg. 19 stage.

Longfield railway station and the nearest secondary school are between 4 and 5 km from the centre of New Ash Green and are only accessible from on foot by fit and healthy people, with the return journey almost relentlessly uphill. Bus services are minimal and are not convenient for many purposes. While nine bus services appear to serve New Ash Green, seven of those only provide, at most, one journey in each direction on schooldays at times intended to accommodate schoolchildren. The remaining two bus routes offer five or six journeys per day (fewer on Saturdays and none on Sundays); they do not offer useful transport for workers, college students nor, in many cases, hospital appointments; connections with trains at Longfield are very limited and inconveniently timed – with no possibility of a return from London Victoria station after 4:42pm.

These constraints to development are recognised in the Interim Sustainability Assessment Report at 5.4.2 onwards but with the questionable conclusion that they could be accepted because “the strategic context is such that it is difficult to envisage lower growth [of New Ash Green]”. It is not acceptable to impose the strain of a large population increase onto the existing community even if the District has a strategic imperative to provide housing.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

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1. Please specify the **policy or site** to which your comments relate:

Education

2. Do you have any comments on or suggested changes to the proposed policy/site?

With the exception of Milestone Academy, which only caters for children with special needs, there are no secondary schools in Sevenoaks District within easy reach of New Ash Green so, as acknowledged on page 25 of the Local Plan Reg 18 consultation document, all pupils have to be bussed or driven out of the District; cycling to Longfield Academy might be possible but only by using the one main, and heavily trafficked, road through Hartley or longer routes on single-track country lanes. Many children travel up to an hour or more each way by bus to secondary schools in Wilmington, Dartford, Gravesend, Meopham and Wrotham. Further education settings in Dartford, Gravesend and Medway are inaccessible by public transport because of their longer hours. New Ash Green Primary School is currently oversubscribed so there is no capacity to absorb additional children without substantial investment in enlarged premises; taking them to the alternative primary schools in Hartley, Longfield, West Kingsdown or further afield would entail transporting the children by car.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

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# Sevenoaks District Local Plan

## Regulation 18 - Comments Form

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Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

Retail

2. Do you have any comments on or suggested changes to the proposed policy/site?

New Ash Green shopping centre has suffered over many years from competition by out-of-town outlets, large supermarkets, increased personal mobility and the rise of internet shopping. The fabric of the centre was neglected by its previous owners, and its deterioration is now slowly being addressed by the current owner although a shortage of capital funding for regeneration is hindering progress. The decline in retail provision has generally stabilised with the remaining shops now providing important facilities for the community of New Ash Green and the surrounding villages whilst the present owners are planning some limited expansion. The 2022 Sevenoaks Town Centres Strategy is a useful framework for regeneration planning, provided adequate funding can be made available

Retail outlets which cannot be accommodated in the shopping centre, such as a builders' merchant or vehicle tyre sales and repair, are situated on the periphery of New Ash Green and provide local facilities that are of great value to the community.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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1. Please specify the **policy or site** to which your comments relate:

### Strategic Issues

2. Do you have any comments on or suggested changes to the proposed policy/site?

New Ash Green is unique in its concept, design and execution. It is a successful demonstration of the principles developed by Eric Lyons in the mid-twentieth century for a planned, self-contained village within a countryside setting where residents could live in a rural setting with all their day-to-day needs met within walking distance for the great majority. With its clearly defined boundaries and network of pedestrian routes, it has matured into an example of good design which shows how housing can be developed in other rural locations without contributing to urban sprawl or irrevocably damaging the countryside.

In terms of meeting the Council's Strategic Issues, New Ash Green in its present form scores well:

11. *Promoting healthy communities*: The emphasis on pedestrian connectivity within New Ash Green and outwards to the many public rights of way in the surrounding area, together with the doctors' and dentists' surgeries and pharmacy within walking distance help to promote a healthy lifestyle.

12. *Tackling the challenge of climate change*: Private car travel in the immediate area is discouraged by the design of residential neighbourhoods; the dense areas of woodland within and around the perimeter of New Ash Green are helpful in controlling the balance of CO<sub>2</sub> in the atmosphere.

13. *Delivering design excellence*: The architecture of New Ash Green, especially the earlier buildings, is unique and emphasises its local character.

14. *Supporting the delivery of strategic infrastructure*: The relatively isolated location of New Ash Green means that further development would be difficult without very significant investment in infrastructure. Whilst the present infrastructure is generally adequate, more housing would need major enhancements to roads and transport, education and health facilities because the existing provision would be overwhelmed by a significant population increase. Our comments on the Infrastructure Delivery Plan must be taken into account.

15. *Homes to meet local needs*: New Ash Green has always been relatively affordable but recent trends emphasise the need for affordable, smaller properties to cater for younger people and those wanting to downsize. The market for larger homes has been augmented by the building of extensions to many smaller houses.

*I6. Agile and competitive economy and resilient town centres:* The New Ash Green shopping and service centre is in need of careful and sensitive regeneration to meet changing needs; the 2022 Sevenoaks Town Centres Strategy has highlighted this aspect so all planning applications should aim to include support for regeneration as S.106 obligations or through CIL.

*I7. Protecting the natural and historic environment:* New Ash Green was planned to ensure that fingers of countryside stretched right into the heart of the village. This principle is fundamental to Eric Lyons' concept of the 'village in the countryside'. Any further development must ensure that this principle is maintained and enhanced, to protect the character of New Ash Green.

Similarly, when considering the Vision and Objectives of the Plan In and around New Ash Green:

*V1. Promoting healthy communities:* New Ash Green has offered its residents the opportunity to improve the quality of their mental and physical health through interaction with the green spaces around them; this must not be compromised by further development which fails to achieve the same objectives for existing and future residents.

*V2. Tackling the challenge of climate change:* Opportunities for New Ash Green residents to make lifestyle choices that will tackle the challenges of climate change must be protected and enhanced including the provision of electric vehicle charging for residents and visitors.

*V3. Delivering design excellence:* Any new development and regeneration proposals for New Ash Green and its immediate environs must reflect the unique character of the village.

*V4. Supporting the delivery of strategic infrastructure:* Sustainable transport opportunities for New Ash Green residents are limited by the inadequacies of the road network and public transport options, so this acts as a constraint on further development; the Local Plan must take this into account in allocating development sites.

*V5. Homes to meet local needs:* Any development around New Ash Green must include a large proportion of affordable homes to ensure that suitable housing is available for first-time buyers and that the demographic mix of the community is not reduced.

*V6. Agile and competitive economy and resilient town centres:* Local employment in New Ash Green and the immediate area is important because of the difficulties of transport to work further away. Existing employment sites must be protected and new opportunities developed where practical.

*V7. Protecting the natural and historic environment:* The historic concept of New Ash Green is important as a model for future developments so the original principles and high-quality natural environment must be protected if any further development is planned.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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4. Are you aware of any additional sites which we have not yet considered?

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1. Please specify the **policy or site** to which your comments relate:

### Settlement Hierarchy and Sustainability Assessment

2. Do you have any comments on or suggested changes to the proposed policy/site?

The inclusion of New Ash Green and Hartley as Primary Service Settlements is questionable given their proximity to Longfield which, despite its smaller population, is better connected and offers more facilities, including the railway station, a 2,600 m<sup>2</sup> supermarket and a secondary school; for that reason it is often the local destination of choice for people from those villages. Poor road infrastructure, inadequate public transport, and the existence of better provided destinations close by, mean that the value of Hartley and New Ash Green as service settlements for people from the wider area is limited.

The Sustainability Assessment has flawed methodology and it is inconsistently applied. In its present form it suggests that New Ash Green is a more sustainable location for development than it actually is. It states that eleven bus routes serve New Ash Green (nearly three times the number quoted for Swanley!) but, even if school buses are counted, there are actually nine registered routes serving New Ash Green, of which seven are school buses operating, at best, once a day only during school terms – theoretically these are available for public use but in practice they are of only very limited usefulness for the general public because seven of the buses leave New Ash Green between 7:11 and 7:35am. Similarly, up to nine buses arrive into New Ash Green between 3:45 and 4:50pm on most schooldays although several have variable times due to flexible school hours. More noteworthy, all those buses pass through Hartley, yet the Sustainability Assessment for Hartley only shows **two** bus services, presumably having discounted the school buses. This is worryingly inconsistent and throws doubt on the accuracy of the entire document. Also, the scoring of facilities within 1,200 metres of New Ash Green includes seven on the Heaver Trading Estate site (NAG4) plus The Forge (NAG1) – sites proposed for housing which means that the facilities will be lost if they are redeveloped; it is disingenuous to use them to demonstrate the sustainability of the dwellings that would replace them. Those two issues alone erroneously inflate the sustainability score of New Ash Green by 17 points. Furthermore, many of the facilities used to calculate the sustainability score for New Ash Green are not those which the majority of people would use on a regular basis, for example the convenience stores are generally only used for top-up purchases and the main weekly shop tends to be in the larger supermarkets, of which the nearest is in Longfield with bigger ones in Dartford and Gravesend. This means that most people rely on cars or delivery services and travel north, out of the District, for the majority of shopping needs.

New Ash Green is demonstrably **not** a sustainable location for housing development on the scale proposed because, without the very substantial investment necessary to mitigate all the

disadvantages that we have highlighted in our comments on the Infrastructure Delivery Plan, the quality of life for new and existing residents would be seriously diminished. The scale of investment needed to ensure that the roads in all directions would be fit for purpose would be beyond the reach of a single developer. Such work would be likely to have the unintended consequence of providing alternative through routes for traffic that is trying to avoid the frequent congestion on major roads in the wider vicinity. Investment in improved coverage and frequency of public transport would also be difficult to achieve without first improving the road infrastructure to the extent that it would be suitable for regular use by buses and addressing the congestion further afield that has an adverse effect on reliability. The wide range of destinations to which people need to travel for school, work, employment, leisure or shopping because of the relatively isolated position of New Ash Green, virtually equidistant from many of them, would also be an insurmountable challenge for the provision of a comprehensive public transport network.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure.

Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

No.

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1. Please specify the **policy or site** to which your comments relate:

**Site NAG1 (The Forge)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

The existing business on this site provides a valuable service for residents of New Ash Green and the surrounding area. It is a long-established builders' merchant which has considerable expertise in providing the often unique materials required for the repair of the unusual buildings in New Ash Green. NAGVAL would not support the development of housing or any other alternative use on this site unless the existing business is first relocated into an equally accessible location.

Experience has shown that the Kent car parking standards are inadequate for developments in the New Ash Green area because its location and inadequate public transport demand greater than average use of private cars. Any development must include car parking at a higher standard to avoid overspill parking on surrounding roads.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

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1. Please specify the **policy or site** to which your comments relate:

**Site NAG2 (Royal Oak Car Park)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

This site is located on Chapel Wood Road which was constructed as a bypass for New Ash Green by widening and straightening the lane, to prevent through traffic passing through the centre of the village. The public house is the only pre-existing building on that stretch of the road, north of West Yoke. It has a 40mph speed limit and no street lighting. The road does not offer a safe access to a residential estate. There is already some parking on the road, which constitutes a danger to other traffic, especially at night and the loss of the car park for the public house would seriously exacerbate this situation.

The estimated capacity of 9 units on this small site (0.09ha) equates to over 90dph which is completely out of character for New Ash Green and the nearby housing.

If this site is developed for housing the loss of the facility could have an adverse impact on the viability of the public house, a community facility, and is therefore contrary to policy COM1.

NAGVAL therefore objects to the housing allocation of this site.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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1. Please specify the **policy or site** to which your comments relate:

**Site NAG3 (New Ash Green Village Centre)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

Although this site has been carried forward from the 2015 ADMP, there have been significant changes since that time, including redevelopment proposals which proved to be financially unviable, a change of ownership in 2023 to a company that is willing to engage in regeneration but requires substantial funding to do so, and the 2022 Sevenoaks Town Centres Strategy which proposed a more realistic regeneration model.

The new owner of the centre has been obtaining permission for a limited number of conversions of upper-level properties to residential units, about 25 in total. However, the proposed allocation of 70 units would only be achieved with the original redevelopment ideas from 2015. The present owner has expressed a preference for retaining and improving the existing infrastructure. This approach is supported by the conclusions of the Town Centres Strategy which proposes planning for stability with only limited light touch infill buildings to enclose yard spaces. Whilst some of these buildings might provide an opportunity for a small amount of new housing, we do not believe that the allocation of 70 units is realistic. NAGVAL does nevertheless support the inclusion of further residential units in the ongoing regeneration of the centre where they can be provided without compromising the primary commercial and retail functions and, importantly, if there is adequate additional car parking which does not reduce the capacity and convenience of the existing heavily used public car parks because New Ash Green is not a sustainable location for anyone without access to at least one car.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

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Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Site NAG4 (Heaver Trading Estate)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

The suggestion that site NAG4 is an opportunity to make best use of a PDL site well linked to a local service centre is questionable given that it is over 1 km from New Ash Green village centre, school and surgery using a narrow roadside footpath so most people would tend to drive where possible, while public transport options for longer journeys are very limited. Also, no account has been taken of the loss of the facilities currently located in the trading estate which are important to serve the local community and have been counted in the sustainability score for New Ash Green. Housing allocation is therefore contrary to policy EMP1 as it will reduce local retail, leisure, employment and other services. We note that the Interim Sustainability Report says that it is one of the series of new proposed allocations to the west and south of the settlement [of New Ash Green] that must be planned for strategically. This location is even less sustainable than those nearer to New Ash Green because residents would be far more likely to use cars for journeys where possible.

Experience has shown that the Kent car parking standards are inadequate for developments in the New Ash Green area because its location and inadequate public transport demand greater than average use of private cars. Any development must include car parking at a higher standard to avoid overspill parking on surrounding roads.

A planning application for 74 residential units on this site was refused in 2024 for reasons including the substantial harm to the openness and open character of the Green Belt, the failure to respect the spatial character of the area, and the loss of the established business uses. These objections still apply to this proposed allocation for 80 units.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

No.

Would you like to be added to our mailing list to be notified of updates to the Local Plan and future consultations?

**Yes** / ~~No~~ (Please delete as appropriate)

Please give your: **Name and Address, Email and Contact Number** and those of your Agent (if you have appointed one to act on your behalf). If you live in the District, please also note which Parish you live in.

New Ash Green Village Association Limited  
Centre Road, New Ash Green, Longfield DA3 8HH  
admin@nagval.com  
01474 872691  
Ash-cum-Ridley Parish

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# Sevenoaks District Local Plan

## Regulation 18 - Comments Form

Consultation Period: 23<sup>rd</sup> October – 11<sup>th</sup> December 2025

Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Site NAG5 (Grosvenor)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

The unique self-contained community of New Ash Green, which forms the largest densely built-up area in the northeast of the District, must be protected from unrestricted sprawl beyond its clearly defined boundaries. The Green Belt is tightly drawn around New Ash Green to ensure that it remains distinct. Purposes A and D of the Green Belt are therefore obviously important in the immediate environs of the historic garden village of New Ash Green and for this reason the classification of the surrounding land as 'grey belt' is wrong. Furthermore, purposes B and C relate to the need to maintain the separation between New Ash Green and Hartley and to safeguard the surrounding countryside from encroachment. The strong contribution that site NAG8 makes to the relevant purposes of the Green Belt means that it cannot be classified as 'grey belt'. As with all sites around New Ash Green, this location does not score well for sustainability because of the absence of many local facilities, including adequate public transport, schools and road access.

Access to site NAG5 would be difficult because of the poor visibility at a bend on the very narrow Church Road. It has no direct vehicular or pedestrian access into residential neighbourhoods so residents would be forced to use Church Road, which is narrow and has no footpaths. The construction of housing on the site, beyond the infrastructure of New Ash Green, would lead to traffic conflicts and expose the residents of the new housing area to serious hazards, especially for pedestrians, when using the road to reach schools, shops and other facilities.

Development of this site would also compromise the concept of New Ash Green as a self-contained community by putting unfunded pressure on the facilities, including street lighting, path maintenance and the upkeep of leisure facilities, community buildings and public open space, that are the responsibility of New Ash Green Village Association with money provided only by residents of the existing properties through the original development scheme. This development would add to the demand on the primary school and surgery which already struggle to meet the needs of the existing population.

Experience has shown that the Kent car parking standards are inadequate for developments in New Ash Green because its location and inadequate public transport demand greater than average use of private cars. Any development must include car parking at a higher standard to avoid overspill parking on surrounding roads.

Although the Development Brief refers to the opportunity to incorporate housing for older people, we question its suitability for this purpose because of the distance (about 1,000 metres) to

facilities in New Ash Green village centre.

If the site is to be included in the Local Plan for residential use, a detailed Development Brief which fully addresses all the above issues must be provided and enforced.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure.

Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

No.

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**Yes** / ~~No~~ (Please delete as

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# Sevenoaks District Local Plan

## Regulation 18 - Comments Form

Consultation Period: 23<sup>rd</sup> October – 11<sup>th</sup> December 2025

Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Site NAG6 (Land west of Chapel Wood Road)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

Site NAG6 has significant sustainability issues relating to the isolation of New Ash Green and poor access to facilities outside the village. We have commented on this elsewhere but we must stress that the 2025 Planning Practice Guidance clearly states that where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances and that where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate. It also says, “the need to promote sustainable patterns of development should determine whether a site’s location would be appropriate for the kind of development proposed”. This site is not in a sustainable location and the very significant improvements that would be required to make it sustainable would be beyond the resources of anyone developing a site of this size.

The high voltage electricity transmission line across both parcels of land and the ancient woodland to the north are also constraining factors that limit its usefulness. There is likely to be archaeological interest on the sites because of the proximity, in Chapel Wood, of the remains of Scotgrove Manor which was occupied during the years of at least 1225 to 1350 and formed part of a wider residential and industrial settlement which possibly extended, in the south, towards the ancient settlement of West Yoke. The Manor was apparently abandoned after the black death plague of 1348 but only limited archaeological studies have been carried out to establish the form and extent of the settlement.

The 2017 Green Belt Assessment states that for the definition of ‘historic town’ in Sevenoaks District, “New Ash Green was considered in the assessment due to its unique historical identity (largely intact) as a prototype for a new way of living from the 1960s onwards. The neighbourhoods in New Ash Green are designed along ‘Radburn’ lines, separating roads from pedestrian paths. As well as housing, the village’s public and county buildings include a shopping centre, offices, community centre, church, library, clinic and primary school.” The 2025 Green Belt Assessment reiterates the categorisation of New Ash Green as an historic settlement; we have explained why we consider that this disqualifies the surrounding land from definition as ‘grey belt’ and suitable for development.

Consequently, it is important to ensure that the setting of the village in the countryside, as envisaged by its architect, Eric Lyons, in the 1960s, is preserved. The unique self-contained community, which forms the largest densely built-up area in the northeast of the District, must be protected from unrestricted sprawl beyond its clearly defined boundaries to comply with Purpose D of the Green Belt (*To preserve the setting and special character of historic towns*).

We note that for the purposes of the Green Belt/grey belt assessment, the 'service settlements' across the District are considered to have the same status as towns, and therefore Purpose B of the Green Belt (*To prevent neighbouring towns merging into one another*) must be taken into consideration for deciding whether development would result in the merging of New Ash Green and Hartley. The 2017 Green Belt Assessment identified the environs of New Ash Green and Hartley as meeting Purpose B; this assessment remains unchanged and must be given greater weight than in the 2025 Green Belt Assessment as we have argued in our comments on that document.

Purpose A (*To check unrestricted sprawl of large built-up areas*) is also important because New Ash Green and Hartley, together with Longfield, form the largest built-up area in the north-east quadrant of Sevenoaks District, with a combined population of over 16,000 – only 1,000 less than Swanley; the surrounding Green Belt therefore serves this purpose when the villages are taken together.

The Green Belt is tightly drawn around the village to ensure that it remains distinct. Purposes A and D of the Green Belt are therefore obviously important in the immediate environs of the historic garden village of New Ash Green and therefore the classification of the surrounding land as 'grey belt' is wrong. Furthermore, purposes B and C relate to the need to maintain the separation between New Ash Green and Hartley and to safeguard the surrounding countryside from encroachment. Along with the poor sustainability score attributed to New Ash Green, it is mistaken to classify the nearby Green Belt as 'grey belt' that is suitable for development.

NAGVAL's comments on the 2025 Green Belt Assessment demonstrate the impact that building on this previously undeveloped land would have, alongside other proposals, on the setting and special character of the historic New Ash Green whilst also leading to further unrestricted sprawl of the large built-up area which comprises New Ash Green, Hartley and Longfield. New Ash Green has been shown to be an unsustainable location for new development because of its very poor transport connections and limited services, so the inclusion of this site in the Local Plan would be contrary to paragraphs 110, 115, 148, 153, 155 of the NPPF.

This Grade 3 agricultural land meets the Green Belt purposes of preventing the sprawl of New Ash Green beyond its clearly defined boundary and preserving the setting and special character of the historic development, so it is wrong to consider this land as 'grey belt'. The strong contribution that site NAG6 makes to the relevant purposes of the Green Belt means that it cannot be classified as 'grey belt'. As with all sites around New Ash Green, these locations do not score well for sustainability because of the absence of many local facilities, including adequate public transport, secondary schools and road access.

Development of this site would also compromise the concept of New Ash Green as a self-contained community by putting unfunded pressure on the facilities, including street lighting, path maintenance and the upkeep of leisure facilities, community buildings and public open space, that are the responsibility of New Ash Green Village Association with money provided only by residents of the existing properties through the original development scheme. A development of this scale would add a significant demand on the primary school and surgery which already struggle to meet the needs of the existing population.

Experience has shown that the Kent car parking standards are inadequate for developments in the New Ash Green area because its location and inadequate public transport demand greater than

average use of private cars. Any development must include car parking at a higher standard to avoid overspill parking on surrounding roads, especially Chapel Wood Road which already suffers from parking by staff of Milestone School, patrons of the Royal Oak public house and adjacent residential neighbourhoods. Chapel Wood Road was widened and straightened during the development of New Ash Green as a garden village in a countryside setting. The road was intended to be a bypass to prevent through traffic passing through the village and ensure the safety of its residents. HGVs are banned from the section of Ash Road through New Ash Green, except for access. Chapel Wood Road is not an internal distributor road. Consequently, it is unlit, has a 40mph speed limit (which is often exceeded), no direct vehicular access into residential neighbourhoods and only limited pedestrian routes into the village. The construction of a significant amount of housing with multiple vehicle and pedestrian accesses on the west side would lead to traffic conflicts and expose the residents of that area to serious hazards when crossing the road to reach schools, shops and other facilities.

On roads with an 85 percentile speed of 40mph it is recommended to allow 80 metres stopping distance which would be difficult to achieve in these locations. The introduction of pedestrian crossings and other traffic calming measures would add to the existing hazards of parked vehicles (especially at night); these measures, and the alternative of lowering the speed limit, would reduce the value of the road as a bypass, encouraging more traffic to drive through the middle of New Ash Green. If the site is to be included in the Local Plan for residential use, a detailed Development Brief which fully addresses all the above issues must be provided and enforced.

The development of the two areas of Green Belt which are the subject of this proposal would lead to an undefined incursion of buildings into open countryside. This would be contrary to paragraph 149 (f) of the NPPF which requires local planning authorities to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. As a result, there would be pressure to develop more of the adjoining parcels of land, leading to further sprawl of the built-up area, conflicting with the fundamental aim of Green Belt policy which is to prevent urban sprawl by keeping land permanently open (NPPF paragraph 142).

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)  
Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

No.

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# Sevenoaks District Local Plan

## Regulation 18 - Comments Form

Consultation Period: 23<sup>rd</sup> October – 11<sup>th</sup> December 2025

Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Site NAG7 (Slides Farm)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

Access to site NAG7 is difficult because it only has one option for vehicular access from a single-track road. This is inadequate for a development of 150 homes. It has no direct vehicular or pedestrian access into residential neighbourhoods so residents would be forced to use North Ash Road, which is narrow and has no footpaths. The construction of a significant amount of housing on the north side, beyond the infrastructure of New Ash Green, would lead to traffic conflicts and expose the residents of the new housing area to serious hazards when using the road to reach schools, shops and other facilities.

The location of the development, on the side of an undeveloped valley, would be prominent and difficult to screen effectively, unlike the rest of New Ash Green which is largely built on the dip slope plateau of the North Downs within a thick tree screen.

The 2017 Assessment notes that for the definition of ‘historic towns in Sevenoaks District, “New Ash Green was considered in the assessment due to its unique historical identity (largely intact) as a prototype for a new way of living from the 1960s onwards. The neighbourhoods in New Ash Green are designed along ‘Radburn’ lines, separating roads from pedestrian paths. As well as housing, the village’s public and county buildings include a shopping centre, offices, community centre, church, library, clinic and primary school.” The 2025 Green Belt Assessment reiterates the categorisation of New Ash Green as an historic settlement; we have explained why we consider that this disqualifies the surrounding land from definition as ‘grey belt’ and suitable for development.

Consequently, it is important to ensure that the setting of the village in the countryside, as envisaged by its architect, Eric Lyons, in the 1960s, is preserved in accordance with Purpose D of the Green Belt (*To preserve the setting and special character of historic towns*). The unique self-contained community, which forms the largest densely built-up area in the northeast of the District along with Hartley and Longfield which, together, have a combined population of over 16,000 – only 1,000 less than Swanley. They must be protected from unrestricted sprawl beyond their clearly defined boundaries. The Green Belt is tightly drawn around the villages to ensure that they remain distinct. Purpose A (*To check unrestricted sprawl of large built-up areas*) is therefore clearly met as the surrounding Green Belt serves this purpose when the villages are taken together. Consequently, Purposes A and D are obviously vital in the immediate environs of the historic garden village of New Ash Green and therefore the classification of the surrounding land as ‘grey belt’ is wrong. Furthermore, purposes B and C relate to the need to maintain the separation

between New Ash Green and Hartley and to safeguard the surrounding countryside from encroachment.

NAGVAL's comments on the 2025 Green Belt Assessment demonstrate the impact that building on this previously undeveloped land would have, alongside other proposals, on the setting and special character of the historic New Ash Green whilst also leading to further unrestricted sprawl of the large built-up area which comprises New Ash Green, Hartley and Longfield. New Ash Green has been shown to be an unsustainable location for new development because of its very poor transport connections and limited services, so the inclusion of this site in the Local Plan would be contrary to paragraphs 110, 115, 148, 153, 155 of the NPPF.

The strong contribution that site NAG7 makes to the relevant purposes of the Green Belt means that it cannot be classified as 'grey belt'. As with all sites around New Ash Green, this location does not score well for sustainability because of the absence of many local facilities, including adequate public transport, secondary schools and road access.

The site is a former orchard, with some remnants of ancient woodland in parts. Many of the fruit trees from the orchard remain and NAGVAL supports the comments of Ash-cum-Ridley Parish Council regarding the historical and ecological interest of this site.

Development of this grade 3 agricultural land would also compromise the concept of New Ash Green as a self-contained community by putting unfunded pressure on the facilities, including street lighting, path maintenance and the upkeep of leisure facilities, community buildings and public open space, that are the responsibility of New Ash Green Village Association with money provided only by residents of the existing properties through the original development scheme. A development of this scale would add a significant demand on the primary school and surgery which already struggle to meet the needs of the existing population.

Experience has shown that the Kent car parking standards are inadequate for developments in New Ash Green because its location and inadequate public transport demand greater than average use of private cars. Any development must include car parking at a higher standard to avoid overspill parking on surrounding roads which occurs, for example, further west on North Ash Road next to the recent Manor Gardens development.

We also support the Parish Council's comments about the need for protection of the adjacent ancient woodland and the underlying aquifer.

If the site is to be included in the Local Plan for residential use, a detailed Development Brief which fully addresses all the above issues must be provided and enforced.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

No.

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**Yes** / ~~No~~ (Please delete as appropriate)

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# Sevenoaks District Local Plan

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Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Site NAG8 (Melsetta)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

The unique self-contained community of New Ash Green, which forms the largest densely built-up area in the northeast of the District, must be protected from unrestricted sprawl beyond its clearly defined boundaries. The Green Belt is tightly drawn around New Ash Green to ensure that it remains distinct. Purposes A and D of the Green Belt are therefore obviously important in the immediate environs of New Ash Green and therefore the classification of the surrounding land as 'grey belt' is wrong. Furthermore, purposes B and C relate to the need to maintain the separation between New Ash Green and Hartley and to safeguard the surrounding countryside from encroachment. The strong contribution that site NAG8 makes to the relevant purposes of the Green Belt means that it cannot be classified as 'grey belt'. As with all sites around New Ash Green, this location does not score well for sustainability because of the absence of many local facilities, including adequate public transport, schools and road access.

Access to site NAG8 would be difficult because of the narrow track from Church Road with inadequate visibility splays opposite the Caling Croft junction. It has no direct vehicular or pedestrian access into residential neighbourhoods so residents would be forced to use Church Road, which is narrow and has no footpaths. The construction of housing on the site, beyond the infrastructure of New Ash Green, would lead to traffic conflicts and expose the residents of the new housing area to serious hazards when using the road to reach schools, shops and other facilities.

Development of this site would also compromise the concept of New Ash Green as a self-contained community by putting unfunded pressure on the facilities, including street lighting, path maintenance and the upkeep of leisure facilities, community buildings and public open space, that are the responsibility of New Ash Green Village Association with money provided only by residents of the existing properties through the original development scheme. This development would add to the demand on the primary school and surgery which already struggle to meet the needs of the existing population.

Experience has shown that the Kent car parking standards are inadequate for developments in New Ash Green because its location and inadequate public transport demand greater than average use of private cars. Any development must include car parking at a higher standard to avoid overspill parking on surrounding roads.

If the site is to be included in the Local Plan for residential use, a detailed Development Brief which fully addresses all the above issues must be provided and enforced.

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

No.

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Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**Site NAG9 (Land South of Redhill Road)**

2. Do you have any comments on or suggested changes to the proposed policy/site?

### **NAGVAL strongly objects to the inclusion of this site as a proposed development location.**

Site NAG9 was previously determined to be unsuitable and that conclusion is still applicable because of the constraints of historic environment (adjacent listed buildings as well as the need to protect the historic concept of New Ash Green), biodiversity and landscape sensitivities.

We submit that there is no justification for classifying this site as 'grey belt' because it clearly meets the primary purposes of the Green Belt, by keeping land permanently open and preventing the unrestricted growth of the large built-up area of New Ash Green and also protecting the setting and special character of the historic garden village from being overwhelmed by surrounding development. Neither is there any evidence whatsoever of any existing need for the 'exceptional circumstances' required to support the allocation of Green Belt land for residential use or other inappropriate development the Local Plan.

Firstly, there are plainly defined boundaries for New Ash Green and this situation is one that both the Ash-cum-Ridley and Hartley Parish Councils are anxious to retain. Indeed, there is a long history of litigation between the Village Association, Parish Councils and Bovis Homes over the latter's proposal to develop Northfield on the northern edge of New Ash Green which would have destroyed the open space between New Ash Green and Hartley. This resulted in the rejection of any development of the land.

Secondly, we wish stress that the site does **not** fall within any part of the clearly defined boundary of New Ash Green and has no connection to Redhill Road. The postal address of the site is **Ash Place Farm, Church Road, Ash, Sevenoaks, TN15 7HD**. This is erroneous information which is now out in the public domain and is misleading and confusing. The limits of the village of New Ash Green are defined by the agreement dated 29<sup>th</sup> September 1967 between Span Kent Limited and the Village Association.

#### Protection of the Green Belt

The particular area in question is valued as open, agricultural landscape and is clearly defined by a thick tree belt which helps to define the outer limit of the built-up area of New Ash Green and protect the very special landscape character of the village of Ash and its countryside. Historically, we must also do everything we can to maintain and preserve the setting of Ash Church and the Manor House; the Church having been there since at least as early as 1286. We therefore believe that there is no significant justification that warrants the 'exceptional circumstances' which would be necessary to release this land from the Green Belt.

The Green Belt is tightly drawn around New Ash Green to ensure that it remains distinct. Purposes A and D of the Green Belt are therefore obviously important in the immediate environs of the historic garden village of New Ash Green, a definition confirmed by the 2017 Green Belt Assessment, and therefore the classification of the surrounding land as 'grey belt' is wrong. Furthermore, purposes B and C relate to the need to maintain the separation between New Ash Green and Ash and to safeguard the surrounding countryside from encroachment. NAGVAL has demonstrated in responding to the Infrastructure Delivery Plan that without very substantial investment in many facilities, New Ash Green is not a sustainable location for housing, especially on the scale proposed for this site, so even if it is accepted that 'grey belt' does apply, development would not be acceptable.

In the 2017 Green Belt Assessment carried out by Arup for the Local Plan, New Ash Green was specifically included when looking at the performance of the Green Belt in preserving the setting of historic towns due to its unique historical identity (largely intact) as a prototype for a new way of living from the 1960s onwards. It was noted that in the immediate vicinity of New Ash Green, the Green Belt protects the wider setting of the historic settlement. Again, development of Ash Place Farm would completely negate that purpose of the Green Belt as well as that of preventing encroachment of the developed area into the countryside.

NAGVAL's comments on the 2025 Green Belt Assessment demonstrate the impact that building on this previously undeveloped land would have, alongside other proposals, on the setting and special character of the historic New Ash Green whilst also leading to further unrestricted sprawl of the large built-up area which comprises New Ash Green, Hartley and Longfield. New Ash Green has been shown to be an unsustainable location for new development because of its very poor transport connections and limited services, so the inclusion of this site in the Local Plan would be contrary to paragraphs 110, 115, 148, 153, 155 of the NPPF.

The strong contribution that site NAG9 makes to the relevant purposes of the Green Belt means that it cannot be classified as 'grey belt'. As with all sites around New Ash Green, the location does not score well for sustainability because of the absence of many local facilities, including adequate public transport, schools and road access.

We wish to state in the strongest possible terms that the land must not be given any allocation in the Local Plan for housing or other inappropriate development. NAGVAL supports the Council's commitment to protect its Green Belt, even though it may mean that there will be less available land within the District than would be required to meet the need for housing as calculated by the Government. Kent is not called the Garden of England for nothing and this must be maintained.

The site is clearly representative of the 'Ash-cum-Ridley Settled Downs' landscape character area, falling within the Hartley/New Ash Green East sensitivity assessment area where higher levels of sensitivity to built development are indicated. Here the 2017 Landscape Sensitivity Study by LUC recognises the attractive, highly rural setting to the villages, with few human influences and many characteristic rural features including mature broadleaved woodland, thick hedgerows and traditional buildings. This part of the area is specifically noted as retaining the separation between the larger settlement of New Ash Green and the smaller villages of Ash and Ridley, which are different in both scale and form. The resultant guidance points to the 'absolute constraints' to development formed by the frequent areas of ancient woodland and says that any new development should retain the rural and low-density settlement pattern, the strong rural character and high levels of tranquillity and avoid siting development on prominent slopes or in highly visible areas. The proposed development of an estate of up to 580 dwellings and other urban uses would be in direct conflict with this guidance.

NAGVAL does not believe that there are any significant exceptional circumstances or social and community benefits to justify the release of this Grade 3 agricultural land in the Green Belt for development. We do not understand the classification of part of the site as 'Other' or 'Urban' apart from the area of ancient woodland. There are at least six community halls available for use by villagers and there is no need for any more facilities of this nature which would be likely to add to the administrative difficulties already experienced in finding volunteers to manage the various properties. There is no evidence for providing a second primary school that would warrant release of this land.

#### Healthcare Provision

The Jubilee Medical Group, which has surgeries in New Ash Green and Longfield, is stretched already and this practice has had to deal with the extra work resulting from increases in healthcare requirements from care homes, nursing care as well as care in the community and increased patient care resulting from secondary services and these extra requirements together with the increased housing already in Longfield and Hartley have stretched the local practice to breaking point. We understand that the Group has stated publicly that it is unlikely they would have the necessary resources or capacity to take on additional residents as patients. Should any proposal for development be included in the Local Plan, it is difficult to imagine how adequate health provision could be provided for existing patients, never mind an extra 2,000 or more. This would also be exacerbated by the national shortage of doctors willing to go into local practice. The other GP locations in the wider area, in Meopham, West Kingsdown and Farningham, as well as the Longfield surgery, are inconveniently located, well beyond walking distance and most would be unable to accept additional patients. Darent Valley Hospital is already under severe pressure which can only get worse when the Ebbsfleet development of some 14,000 homes gathers momentum.

#### Highways and Transport

New Ash Green is largely a commuter village with many residents already travelling out of the area to work. Any proposal to build on this land would have a serious impact on road travel and the rail services, not to mention the additional parking problems that would be inevitable. A substantial amount of new housing in the area will add to existing traffic congestion which has increased over the years and is already rendering Ash Road, being the main through road to Longfield, very busy and at sometimes it is at a standstill. The road leading south to the A20 from Ash, New Ash Green, Hartley and Longfield is already in difficulty as the current use of satellite navigation results in huge articulated HGVs driving through what amounts to be a country road, single-track in places with very few passing points suitable for large vehicles, to get to Longfield and through to the M2 and the Dartford Tunnel. The direct route from this site eastwards towards the M25 and south London would involve the use of Billet Hill and the single-track roads beyond which are already heavily congested at peak times. Since the advent of Bluewater, the villages of Ash, New Ash Green and Hartley have already seen an increase in traffic because of people cutting through the country lanes to get from the M20, M25, A20 to Bluewater. Unless there is a substantial improvement to all these access roads there will be an unacceptable strain to the already inadequate road system. We would also question who would pay for an improved road system should these proposals go through as they would be beyond the resources of a developer. Councils are already cash strapped and road repairs are not considered a priority. To provide better road facilities would also require costs relating to acquiring land and we believe the money would be better used to improve the strategic road network so that local roads through residential areas are not used by through traffic.

Safe and convenient access to the site would be impossible. It is inappropriate for a development of the size indicated, for housing and other uses, to be served by a single vehicular access which would inevitably create a dangerous junction where it meets Ash Road in close proximity to other accesses to existing and proposed developments at Meadow Farm/Heaver trading Estate and Oast House Nursery. No other possibilities exist for alternative access points because Hartley Bottom Road and Church Road are single-track lanes and the site would be unable to link to Redhill Road because the intervening land is owned by NAGVAL and would not be made available.

Pedestrian access to shops, sports facilities and the existing educational establishments in New Ash Green would be along muddy woodland paths, unlit at night, which many people would be reluctant to use for security and practical reasons so cars would be the main method of transport even for short, local journeys, contrary to the basic design principles of New Ash Green which encourage walking.

Traffic and access issues must therefore be considered as a fundamental objection to this proposed development.

#### Educational Provision

We cannot see any justification for another primary school and it should be noted that the latest Ofsted reports for Hartley Primary Academy and Milestone Academy give both as being 'Outstanding' and 'Good' for New Ash Green Primary School. We have been unable to identify anything in these reports which indicates that the schools are suffering from a lack of facilities and evidence previously provided by the education authority in respect of proposed housing allocations in the area confirmed that the existing primary school provision in the locality is adequate for current needs. Although New Ash Green Primary School is currently oversubscribed, it was designed for a larger number of pupils than it currently serves and could easily be expanded if necessary either in the existing accommodation or by extending within the extensive grounds without the necessity for the additional overheads of providing a new school in close proximity.

#### Utilities

Whilst this does not immediately affect the villages of New Ash Green and Ash, we are aware of substantial flooding problems in the Fawkham Valley and Hartley Bottom which happen regularly. Any development in this area would first have to have costly drainage improvements to mitigate the potential for flooding of the new homes and wider area. The site also includes part of the Source Protection Zone for the South East Water borehole extraction in Hartley Bottom so this would be compromised by any development.

#### Impact on New Ash Green

New Ash Green has a unique management structure with many of the facilities that local government would normally provide being owned and maintained by the Village Association. These include all footpaths outside the village centre, street and path lighting, playgrounds, extensive areas of public amenity space including ancient woodlands, and community facilities such as the village hall, sports field and pavilion. The finance for this is provided through restrictive covenants attached to all homes in the village which require residents to pay an annual contribution to the Village Association in return for the right to use its facilities. This contribution represents the greatest part of the Association's income and must be preserved for the benefit of

future residents. Given that the occupants of any residential accommodation built on this land would inevitably enjoy the use of the Village Association's facilities, there would be no mechanism for those people to contribute a fair share towards the cost of providing them. This additional use would increase maintenance costs and place an intolerable burden on existing New Ash Green residents who would be forced to subsidise the new residents without any means of recompense.

We have argued above that the classification of this land as 'grey belt' cannot be justified within the terms of the NPPF because it contributes strongly to purposes A and D of the Green Belt.

As already noted, the 2017 Green Belt Assessment states that for the definition of 'historic towns in Sevenoaks District, "New Ash Green was considered in the assessment due to its unique historical identity (largely intact) as a prototype for a new way of living from the 1960s onwards. The neighbourhoods in New Ash Green are designed along 'Radburn' lines, separating roads from pedestrian paths. As well as housing, the village's public and county buildings include a shopping centre, offices, community centre, church, library, clinic and primary school." Consequently, it is important to ensure that the setting of the village in the countryside, as envisaged by its architect, Eric Lyons, in the 1960s, is preserved. The Green Belt Assessment included New Ash Green in its definition of 'historic towns' because of its unique historical identity, so the adjacent Green Belt is vital in presenting that identity and meets Purpose D (*To preserve the setting and special character of historic towns*). The unique self-contained community, which forms the largest densely built-up area in the northeast of the District, must be protected from unrestricted sprawl beyond its clearly defined boundaries.

Purpose A (*To check unrestricted sprawl of large built-up areas*) is also important because the New Ash Green and Hartley, together with Longfield, form the largest built-up area in the north-east quadrant of Sevenoaks District, with a combined population of over 16,000 – only 1,000 less than Swanley; the surrounding Green Belt therefore serves this purpose when the villages are taken together. Along with the poor sustainability score attributed to New Ash Green, it is mistaken to classify the nearby Green Belt as 'grey belt' that is suitable for development.

The Village Association objects strongly to the proposals for site NAG9 to allocate land for a new development between New Ash Green and Ash. We wish to protect the concept of New Ash Green as a self-contained village in the countryside as envisaged by its architect, Eric Lyons. Any development on this site would be an unnatural extension to the urban confines of New Ash Green. The development of this part of the Green Belt would lead to an undefined incursion of buildings into open countryside. This would be contrary to paragraph 149 (f) of the NPPF which requires local planning authorities to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. As a result, there would be pressure to develop more of the adjoining parcels of land, leading to further sprawl of the built-up area, conflicting with the fundamental aim of Green Belt policy which is to prevent urban sprawl by keeping land permanently open (NPPF paragraph 142).

With regard to any proposals for development in addition to the housing, we do not believe that there are any significant exceptional circumstances or social and community benefits to justify the release of the Green Belt for development. There are at least six community halls available for use by villagers and there is no need for any more facilities of this nature which would be likely to add to the administrative difficulties already experienced in finding volunteers to manage the various properties. Whilst New Ash Green Primary School is currently oversubscribed, there is no evidence given for a second primary school that would warrant release of this land. It is also understood that a cemetery extension could already be created as if land became available and we accept it would be an appropriate use of Green Belt land.

Experience has shown that the Kent car parking standards are inadequate for developments in New Ash Green because its location and inadequate public transport demand greater than average use of private cars. Any development must include car parking at a higher standard to avoid overspill parking on surrounding roads.



3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

No.

Would you like to be added to our mailing list to be notified of updates to the Local Plan and future consultations?

**Yes** / ~~No~~ (Please delete as appropriate)

Please give your: **Name and Address, Email and Contact Number** and those of your Agent (if you have appointed one to act on your behalf). If you live in the District, please also note which Parish you live in.

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01474 872691  
  
Ash-cum-Ridley Parish

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# Sevenoaks District Local Plan

## Regulation 18 - Comments Form

Consultation Period: 23<sup>rd</sup> October – 11<sup>th</sup> December 2025

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1. Please specify the **policy or site** to which your comments relate:

Site ASH1

2. Do you have any comments on or suggested changes to the proposed policy/site?

Site ASH1 (Beechcroft Farm Industries) provides valuable employment opportunities with some businesses which are usefully co-located close to the residential community. The site is not currently used to its full potential so there are possibilities for expansion provided that it can be achieved without unacceptable visual intrusion into the Green Belt. A carefully worded development brief will be necessary to ensure that an expanded light industrial site remains a satisfactory neighbour for the nearby residential neighbourhoods. This is particularly important in relation to the Seven Acres neighbourhood of New Ash Green and the proposed housing to the south and east (under construction at Oast House Nursery and sites NAG1 and NAG4).

3. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / **Option 2** / ~~None of above~~ (Please delete as appropriate)

Please explain your answer

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure.

Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

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1. Please specify the **policy or site** to which your comments relate:

**Infrastructure Delivery Plan**

2. Do you have any comments on or suggested changes to the proposed policy/site?

NAGVAL is a unique organisation which owns and maintains, in conjunction with its constituent residents' societies, most of the community infrastructure within New Ash Green including footpaths, some roads, residential car parks, street and path lighting, playgrounds, community buildings, the sports ground and pavilion, public open space and ancient woodlands. This is funded by contributions from all the residents of the original housing in New Ash Green, secured by restrictive covenants on each freehold or leasehold property. NAGVAL therefore performs, for the benefit of its residents, many of the functions normally carried out by local authorities. Parish, District and County Councils are therefore relieved of these responsibilities while residents enjoy the advantages of local control and accountability.

It is therefore extremely disappointing that NAGVAL is not included amongst the infrastructure providers listed in Appendix A of the Infrastructure Delivery Plan October 2025 Statement, and that no prior consultation to comply with paragraph 26 of the NPPF has been carried out before publishing the Statement.

Any significant housing development close to New Ash Green will inevitably mean that residents of those properties will make use of NAGVAL's facilities. If there is no way for them to contribute to their maintenance and running costs, any extra costs for additional provision to cope with demand or wear and tear will fall unfairly upon the residents of the original housing in New Ash Green. It is therefore imperative that arrangements are put in place to ensure that residents of any new housing built within close proximity to New Ash Green pay their share of NAGVAL's costs of both capital enhancements and ongoing maintenance for these facilities. This must be reflected in the Development Briefs for all housing sites that are included in the Local Plan and secured through Section 106 Agreements prior to any grant of planning permission.

A further area of concern is that no account seems to have been taken of the already very inadequate transport infrastructure around New Ash Green. The three bus companies which provide the seven school and two minimal public bus routes serving New Ash Green and Hartley (Red Route, Brookline/Autocar and 1<sup>st</sup> Bus Stop) are not listed in Appendix A, so we assume they have not been consulted. If New Ash Green is to be considered a sustainable location for any significant amount of new housing, there must be substantial investment in improved bus services to reach a wider range of destinations for schools, colleges, workplaces and commuting, health services, shopping and leisure activities. Longfield railway station is not mentioned, so again we

assume that it has been discounted. Although the station is physically outside (but adjoining) the District boundary, with a car park within the District, it is the principal station serving the present population (over 10,700) of Ash, New Ash Green, Fawkham and Hartley. This station should be considered, like others within the District, for improvements such as increased car parking (because, whatever improvements are made to bus services, it must be assumed that cars will remain the principal means of travel to the station) and step-free access between platforms (at present this involves a long walk outside the station, including two unprotected crossings of a main road). It will not be sufficient to offer just a shuttle bus between New Ash Green and Longfield; that may help people to use trains provided the times of operation are sufficiently wide, but many destinations for education, shopping, leisure and employment are in Dartford and Gravesham – the bus service from Longfield to those places is no better than from New Ash Green.

There are no dedicated cycle routes in the area at present and the possibility of introducing any new ones which would be usable is remote because of the constraints of the existing road infrastructure and topography.

The responses from KCC Highways and National Highways are inconclusive but it is very obvious that, since all roads into New Ash Green are of single-track width with the sole exception of one road through Hartley and Longfield to the north, it is impossible to describe New Ash Green as a sustainable location for development without extensive, expensive road improvements (which could bring unintended consequences of diverting more through traffic into the area when avoiding congestion on other roads).

NAGVAL notes that no projects or improvements have been identified by National Grid or UK Power Networks for the electricity supply infrastructure. It has been our experience that the existing electricity infrastructure within New Ash Green is old (50+ years) and cannot cope with much higher usage. NAGVAL has been frustrated in attempts to install electric vehicle chargepoints because UK Power Networks could only offer very limited capacity using the present supply despite the apparent electricity demand headroom referenced in the Future Demand for EV Infrastructure document. The upgrading of the electricity supply network within New Ash Green must be included in Development Briefs and Section 106 Agreements.

Regarding education, NAGVAL agrees that expansion of New Ash Green Primary School would be essential to accommodate the numbers of children who could be expected to live in the quantity of new housing proposed. The school is already oversubscribed so cannot handle any increase in pupil numbers. The school site could cater for this expansion, but it will be important to secure it in advance of need. All the secondary schools and further education settings attended by New Ash Green children are situated outside Sevenoaks District, in Wilmington, Dartford, Longfield, Northfleet, Gravesend, Meopham and Wrotham. These must be included in the assessment of growth scenarios and the need for additional provision.

NAGVAL notes the comments about the need for improvements to Swanley HWRC and we support the inclusion of this in the Local Plan and Development Briefs. However, we wish to point out that the Pepper Hill HWRC in Northfleet is closer to New Ash Green and has better road connections, so this must also be included in the assessment of capacity to serve new developments in Ash, New Ash Green and Hartley (also bearing in mind the extensive housing under construction in Ebbsfleet).

The GP surgery in New Ash Green is already overstretched in dealing with the demands of the existing population, so its expansion and improved staffing must be factored into the Development Briefs and Section 106 Agreements for all new housing developments with appropriate provision for capital expenditure on premises and for extra staff.

Water supply in New Ash Green is provided by South East Water, largely from chalk boreholes in Hartley Bottom. There is no indication in the Infrastructure Delivery Plan that the protection of this source has been considered, nor whether any additional provision would be required to serve new housing.

The Thames Water wastewater network in New Ash Green and Hartley is old and liable to failure so we submit that before any new development is carried out, there must be a full examination of its capacity and the need for upgrading which should be funded by the developers.

The obligations on developers to provide the necessary infrastructure are, typically, secured through Section 106 agreements. Whilst this sometimes works in practice, we are aware of instances where a developer has failed to implement its obligations but has then argued that the required facilities were not viable, and successfully applied for planning permission to use the allocated site for further housing. This happened, for example, in Dunton Green where the promised GP surgery was never delivered because it was claimed that no-one could be found to operate it. We therefore suggest that any Section 106 agreements should require the necessary facilities to be provided **before** the associated housing is completed and subsequently maintained for a long enough period to become established. This latter point is important for the provision of new public transport services which often have to run for several years before people's habits become sufficiently entrenched to make them viable.

NAGVAL understands that the published Infrastructure Delivery Plan is a work in progress so it will be reviewed and refined, during the further work to prepare the Local Plan. This must be done, with costings and an assessment of viability, including realistic consultation with all parties, before the Reg.19 publication. We believe that all these issues need to be addressed before any significant housing developments around New Ash Green are deemed to be sustainable, even if it is accepted that there is 'grey belt' land around the village. We therefore request that we are involved in that process, in accordance with paragraph 26 of the NPPF, to ensure that all impacts from proposed development sites on New Ash Green, and on the infrastructure and services provided by NAGVAL, are fully assessed with appropriate mitigation measures provided as required by paragraph 35 of the NPPF in advance of any development. The absence of an affordable, realistic, achievable Infrastructure Delivery Plan would cause the Local Plan to be a failure because the allocated sites could not be developed.

3. In reference to Policy ST1, which is your preferred option?

No option is perfect and all proposals need to be considered on their total merits. The site at Pedham Place, whilst it is within the National Landscape designation, only contributes weakly to its purposes because of the blight from neighbouring industrial and road infrastructure. Conversely its location close to the facilities in the town of Swanley and exceptionally good road connections, mean that it would be possible to develop the site with minimal adverse impact and thereby make a significant contribution towards the District's housing target which could not otherwise be achieved.

4. Are you aware of any additional sites which we have not yet considered?

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**2025 Green Belt Assessment**

2. Do you have any comments on or suggested changes to the proposed policy/site?

The 2025 Green Belt Assessment takes a somewhat different approach from the 2017 Assessment in that its scope is defined by some of the sites that have been proposed for development around New Ash Green. We understand that the February 2025 Planning Practice Guidance says that a small number of large assessment areas will not be appropriate in most circumstances . It recommends varying the size of assessment areas based on local circumstances and that the assessment of smaller areas may be appropriate in certain places, such as around existing settlements. However, we submit that in view of the many proposed development sites around New Ash Green, assessing each site individually fails to give proper regard to the cumulative effect of the proposed large amount of development almost encircling New Ash Green. The only significant breaks in this ring of housing development would be the land of Ridley Court Farm to the east of New Ash Green which is currently subject to a planning application for a huge, industrial scale solar farm development, and Northfield, in a section of the gap between New Ash Green and Hartley, which is owned by NAGVAL and leased to Ash-cum-Ridley and Hartley Parish Councils as public open space. It is therefore important to give greater regard to the combined effect as well as the individual merits of each site.

The statement at 5.2.55 in the Sustainability Appraisal of the Local Plan, “New Ash Green ... has quite low historic environment constraint, ... being a 20th century new settlement” fails to recognise the historic precedent of a planned “garden village” integrated in its countryside setting.

The impact of adding a further 1,261 residential units to the existing 2,427 already within the village envelope would increase the spatial extent, and population, of the community by over 50%. This would destroy the acknowledged historic significance of New Ash Green as a planned garden village in a countryside setting unless the new housing, its facilities and surrounding open space is designed to be fully integrated into the concept of the garden village development with suitable financial provision by way of a Section 106 agreement for its comprehensive maintenance by NAGVAL, to the same standard as the rest of New Ash Green, alongside its existing responsibilities.

By building large amounts of housing on the periphery of New Ash Green, the intended open connections from the existing residential neighbourhoods into the surrounding countryside would be severed and this would destroy Eric Lyons’ vision of a “compact and well-defined village ... embedded in the surrounding countryside”. In granting planning permission for New Ash Green, Richard Crossman (Minister of Housing and Local Government) reasoned that “he had seen



villages ruined and made suburban by accretions of development around them.” He said, “This was a wrong way of dealing with the countryside as it ruins existing villages, it swamps them and they lose their character. If you build a new village then you don’t need to extend all the smaller villages, it is an alternative form of strategic planning” (Quoted by Ivor Cunningham in *Eric Lyons & Span*, ed. Barbara Simms, RIBA Publishing 2006, p.75). The proposed extensive development of Green Belt land surrounding New Ash Green would be completely at odds with Richard Crossman’s reasoning for permitting the building of New Ash Green. The historic design principles and character of New Ash Green would be overwhelmed by the new housing estates, leading precisely to the suburbanisation that he and Eric Lyons wanted to avoid. If New Ash Green is to continue to be an historic model of how to create a new community in a rural area, its integrity must be protected by not allowing the surrounding countryside to be developed. Otherwise, the village will become just a collection of housing in a suburban setting, and its distinctiveness will be destroyed. The Green Belt has hitherto provided that protection and the NPPF provides an opportunity for the historic importance of the setting and special character of New Ash Green to be recognised and protected because it makes a very strong contribution to Purpose D of the Green Belt (*To preserve the setting and special character of historic towns*).

Purpose A (*To check unrestricted sprawl of large built-up areas*) is also important because, as noted at 5.9 of the Settlement Hierarchy document, New Ash Green and Hartley, together with Longfield, form the largest built-up area in the north-east quadrant of Sevenoaks District, with a combined population of over 16,000 – only 1,000 less than Swanley; the surrounding Green Belt strongly contributes to this purpose when the villages are taken together. The need to prevent the unrestricted sprawl of this built-up area must be taken into account. The large sites proposed adjacent to New Ash Green are free of existing development and, if housing is permitted, they would create incongruous extensions of the built-up area into the surrounding Green Belt.

NAGVAL therefore strongly disputes the assessment of sub-areas AG-01, AG-02, AG-04 AG-05, and AG-06 as poorly contributing to Purposes A and D whilst supporting the assessment of their contribution to Purpose C. We note that for the purposes of the Green Belt/grey belt assessment, the 'service settlements' across the District are considered to have the same status as towns, and therefore Purpose B of the Green must be taken into consideration for deciding whether development would result in the merging of New Ash Green and Hartley. We agree that sub-area AG-01 is instrumental in preventing New Ash Green and Hartley merging, more important than suggested in the Green Belt Assessment, because it occupies a substantial part of the gap between New Ash Green and Hartley when viewed from the only major road through the area, so its development, along with AG-02, would emphasise the ribbon development along Ash Road in Hartley, reduce the visual separation between New Ash Green and Hartley, and lead to pressure to develop the backland of the properties along Ash Road. Consequently, we suggest sub-areas AG-01 and AG-02 must be given a higher score for their contribution to Purpose B. For these reasons and because of the poor sustainability score attributed to New Ash Green which conflicts with paragraph 155 (c) of the NPPF, there is no justification for classifying the Green Belt around New Ash Green as 'grey belt' that is suitable for development. It clearly meets the primary purposes of the Green Belt, by keeping land permanently open and preventing the unrestricted growth of the large built-up area of historic New Ash Green and its adjacent settlements. Neither is there any evidence whatsoever of any existing need for the 'exceptional circumstances' required to support

the allocation of Green Belt land for residential use or other inappropriate development in the Local Plan.

With regard to any suggestion that development around New Ash Green is a logical extension of the existing settlement onto 'grey belt', we argue, firstly, that there are plainly defined boundaries for New Ash Green; this situation is one that both the Ash and Hartley Parish Councils are anxious to retain. Indeed, there is a long history of litigation between the Village Association, Parish Councils and Bovis over the latter's proposal to develop Northfield on the northern edge of New Ash Green which would have destroyed the open space between New Ash Green and Hartley. This resulted in the rejection of any development of that Green Belt land.

Secondly, we wish to stress that the proposed development sites outside the surrounding tree belts and ancient woodland do **not** fall within any part of the clearly defined boundary of New Ash Green. The limits of the village of New Ash Green are defined by the agreement dated 29<sup>th</sup> September 1967 between Span Kent Limited and NAGVAL.

Nevertheless, we also note that the February 2025 Planning Practice Guidance advises that, "Where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the National Planning Policy Framework (NPPF)." Furthermore, the 2025 PPG states, "Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features:

- form part of the setting of the historic town
- make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town".

NAGVAL contends therefore that the large areas of open, undeveloped Green Belt which surround New Ash Green are a vital component of its setting. They make a strong contribution to the purposes of preserving the historic original concept of the unique community and preventing the sprawl of the combined urban area of Hartley, Longfield and New Ash Green, so they cannot be classed as 'grey belt' that is suitable for development.

4. Are you aware of any additional sites which we have not yet considered?

No.

Would you like to be added to our mailing list to be notified of updates to the Local Plan and future consultations?

**Yes /No** (Please delete as appropriate)

Please give your: **Name and Address, Email and Contact Number** and those of your Agent (if you have appointed one to act on your behalf). If you live in the District, please also note which Parish you live in.

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01474 872691  
Ash-cum-Ridley Parish

**Comments that are submitted anonymously will not be accepted.** Comments will be published and attributed by name/organisation only. Contact details will not be published but will be used to keep you informed of the progress of the Local Plan.

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This form can be downloaded from our website:  
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Please return this form by email to [planning.policy@sevenoaks.gov.uk](mailto:planning.policy@sevenoaks.gov.uk) or to:

**Strategic Planning Team, Sevenoaks District Council, Argyle Road, Sevenoaks, TN13 1HG**

If you require more space to write, please use extra comment forms as needed. All comments must be received by no later than **11:59pm on 11<sup>th</sup> December 2025**.

Comments received after the deadline may not be accepted.

Comments that are considered to be libelous, racist, abusive or offensive will not be accepted.