

Draft Response on behalf of Hartley Parish Council to Regulation 18 - Sevenoaks District Local Plan Consultation, 2025

Policy ST1 A Balanced Strategy for Growth

Policy ST1 seeks to ensure a minimum of 1145 dwellings are developed per annum during the Plan period. In seeking to achieve this target, the Parish Council considers that the District Council has underestimated the contribution made by windfall sites.

Small sites allowance

The Parish Council support the inclusion of a historically supported small sites windfall allowance.

The inclusion of these historic delivery rates is considered reasonable because it is an extensive period that corresponds with the early years post the adoption of the Core Strategy (2011) and Allocations and Development Management Plan (2015). Further, there is no evidence to show that supply from this source is diminishing. Therefore, the historic delivery of windfalls from small sites over a lengthy period provides compelling evidence that they will continue to provide a reliable source of supply. Based on historic rates, an allowance of 75 units per year is realistic being based on the annual average windfall supply from sites capable of delivering 1-4 dwellings over that period.

Market evidence indicates that there is strong demand for smaller sites integrated within the existing fabric of the district's towns and villages. Indeed, much of the development market in Sevenoaks is led by small to medium sized local developers, able to undertake both infill development and reuse/redevelopment of existing properties. For this reason, there may be confidence that this type of supply of housing in the district will continue to come forward.

Increased permitted development included in the Town and Country Planning (General Permitted Development) (England) Order 2015 allows new dwellings to come forward through a range of changes of use, within certain limitations and this should allow the strong trend of windfall supply to continue within the District.

Para 4.39 of the Strategic Housing and Economic Land Availability Assessment (SHELAA), October 2025 states to avoid double counting with extant permissions, the windfall allowance is not applied to years 1-3 of the plan period but includes a figure of only 900 dwellings. However, the extant planning permissions at 31 March 2025 provide the baseline supply of housing sites and therefore the following 3 years (2025/26 – 2027/28) should be discounted from windfall contributions so as not to double count. A windfall allowance should therefore be included for the remaining 14 years of the Plan period (2028/29 – 2041/42). At 75 dwellings per year, this should be an allowance of 1050 dwellings not the 900 dwellings currently included for only 12 years.

Larger Windfall sites (5+ dwellings)

Para 4.37 of the SHELAA states that as the Assessment considers all sites capable of delivering 5 or more dwellings, and that the windfall allowance only includes sites capable of delivering 1-4 dwellings only.

The Stage 2 Regulation 18 Local Plan included future potential identified in the Settlement Capacity Study, 2022, to provide a total potential housing supply of 565 dwellings over the Plan period from larger sites. The Settlement Capacity Study was useful in highlighting a wide range of potential sources of larger windfall sites, tapping into trends such as the rationalisation of telephone exchanges and future reduced demand for petrol filling stations. Nevertheless, a study such as this cannot accurately capture all opportunities.

It appears this contribution has now been superseded by a supply based on the allocation of sites brought forward through the Call for Sites exercises. However, whilst the larger sites which are currently available are proposed to be allocated as housing sites in the Regulation 18 - Sevenoaks District Local Plan Consultation, 2025, it is difficult to capture all landowners' intentions for the long term at this stage. Whilst every effort will have been made to identify and allocate suitable larger sites (sites with capacity for 5 or more dwellings), this is based on current known landowners' intentions. For this reason, many Councils include within their adopted district plans a windfall allowance on large sites for the latter part of the Plan period (eg 2032/33 – 2041/42) based on an average per annum.

Similarly, the conversion or redevelopment of many larger buildings in larger plots with a capacity of 5 or more dwellings is likely to come forward in the Plan area particularly as this is one of the District's characteristics as evidenced in the adopted Residential Character Area Assessments. Yet it is impractical to observe every larger building/larger plot, or combinations of such sites that will come forward.

Consequently, although the Settlement Capacity Study showed that sources for larger site windfalls abound, it is simply not possible at this time to capture all the opportunities which will come forward during the Plan period.

As with small sites, past trends of completions on large windfall sites provide empirical evidence of housing delivery from this source. These are not provided as part of the District Council evidence and should be made available. Given the opportunities within the Plan area, including those enabled by Policy H7 - Housing Density and Intensification, it would be reasonable to include an allowance for larger windfall sites whose availability is not currently known for the latter part of the Plan period (eg 2028/29 – 2041/42).

The Parish Council would urge the District Council to increase the windfall contribution to the housing supply to demonstrate additional flexibility within the housing supply and/or a consequential reduction in the need for housing allocations, particularly in the Green Belt.

Policy ST1 is not specific about the quantum of development at each of the settlements within the settlement hierarchy. Rather the policy sets very high level guidance for the general location of development.

Focus of Development within the Boundaries of Existing Settlements

The Parish Council strongly support the focus of development within the boundaries of existing settlements. However, it should be made clear that the Council will specifically prioritise the use of previously developed land within settlements (consistent with the NPPF, Para. 125) or adjacent to settlements (consistent with Para. 1.18 of the Regulation 18 Local Plan).

There is currently no explicit reference in the policy to the preferred location of previously developed land being within or adjacent to settlements. In considering both previously developed land and the grey belt, the NPPF stresses that the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to the availability of sustainable modes of transport (Para.148)

In order to be consistent with the NPPF, the ambiguity over the preferred location of previously developed sites should be clarified in Policy ST1 for the avoidance of doubt.

Use of Previously Developed Land

The Parish Council only support the use of brownfield sites for housing where the existing use is no longer viable or required to maintain sustainable development (eg the loss of retail units, business sites or community uses would not represent sustainable development in most circumstances). Indeed, this is already one of the criteria for site selection in the SHELAA Stage 2 Assessment. Similarly, Policy H6 – Smaller Sites requires robust evidence and re-provision where required but this applies only to sites of 1ha or less. For consistency and to ensure the sustainable distribution of development, a similar caveat should therefore be added to Policy ST1 in consideration of the suitability of **all** brownfield sites for residential development.

Release of Grey Belt sites

The proximity of train stations alone does not represent a sustainable location for housing development which needs access to day to day facilities by a range of sustainable transport modes, consistent with the remainder of Policy ST1 and Policy T2 - Sustainable Movement. For this reason the policy wording requires amendment.

Countryside

Given the rural nature of much of the Plan area, the Parish Council support reference to the countryside in a balanced strategy for growth. However, the reference solely to the National Landscape limits the application of the policy to those parts of the countryside which have this designated status. Hartley Parish Council suggest amended wording, compatible with adopted Core Strategy Policy LO1.

Design Requirements

The Parish Council strongly support the reference to place-making proposals in Neighbourhood Plans.

Policy ST1 should have greater emphasis on the importance of design and, to ensure the status of the design requirements for specific site allocations, they should be contained in policy, not supporting text.

Government is clear that good design is a key aspect of sustainable development and that design **policies** should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of **design policy**, guidance and codes by local planning authorities and developers. (Parish Council's **emphasis**).

Location of Development

The Parish Council strongly support the main focus of development at the main towns within the District – Sevenoaks, Swanley and Edenbridge, with more moderate development within the Service Settlements and small scale limited development and infilling in villages and hamlets.

Classification of Hartley as a Primary Service Settlement

The Settlement Hierarchy, 2025

The Parish Council strongly object to the 1.2km walking distance buffer used in the Settlement Hierarchy, 2025 around Hartley to identify accessible services.

The 1.2km distance is not an accessible walking distance to services and facilities. According to Active Travel England, 1.2km equates to a 15 minute walk.

The 15 Minute City concept is entirely inappropriate in a rural district comprising mainly small settlements. The inappropriateness of the 1.2km threshold is compounded by the methodology which states that facilities are measured from the **edge** of settlements rather than the residential areas within the settlement, in reality making distances longer than the stated 1.2km.

Active Travel England Standing Advice Note 'Active travel and sustainable development' June 2024 states:

'2.5 A mix of local amenities should be located **within an 800m walking and wheeling distance** (using well-designed routes) of all residential properties or staff entrances for workplace facilities.' (Parish Council **emphasis**)

This is supported by *Creating Active Environments through Planning and Design*, Sport England which criterion 5 of Policy HW1 states provides appropriate guidance. The Sport England guidance reiterates the importance of shops, schools, community facilities, open space and appropriate sports facilities typically within a **maximum 800m distance** from existing and proposed homes, along streets and active networks (**Parish Council emphasis**).

An 800m distance equates to a 10 minute walk.

In relation to access to public transport the *Standing Advice Note* recommends:

‘2.9 Most buildings within the application site should be within 400m of a high-frequency bus stop or **800m of a rail/light station** or tram stop, with appropriate facilities.’ (**Parish Council emphasis**). Even the Regulation 18 Local Plan, 2025 (Para. 2.38) correctly states that this distance should be 10 minutes (800m) rather than the 15 minutes (1.2km) quoted in the 15 Minute City concept.

The inappropriateness of the 1.2km for all services within Sevenoaks District is evidenced by reference to national guidance.

For consistency with Active Travel England and the Sports Council, the use of the 1.2km (15 Minute City concept) should be abandoned. As a more reasonable distance consistent with national advice, the Settlement Hierarchy methodology should adopt the 800m distance threshold. The points allocated to each settlement based on neighbouring services and facilities should be modified accordingly.

Hartley Parish Council object to the strategy of ‘more moderate development’ at Hartley in advance of a review of the Settlement Hierarchy methodology and without evidence that the infrastructure (including roads), facilities and services in or close to Hartley have capacity to accommodate such a scale of development.

As well as development at Hartley, the Parish Council express real concern about the impact of the proposed development in New Ash Green (1261 dwellings), in particular on traffic volume and impact on the doctor’s surgery (which already serves Hartley, Fawkham and New Ash Green), schools and other services.

The last CQC Inspection of the Jubilee Medical Group on 17 May 2023 is set out below:

Indicator	Jubilee MG	England Avg	Comment
The percentage of respondents to the GP patient survey who responded positively to the overall experience of their GP practice	35.8%	72.4%	Significant variation (negative)
The percentage of respondents to the GP patient survey who responded positively to how easy it was to get through to someone at their GP practice on the phone	7.1%	52.7%	Significant variation (negative)

The percentage of respondents to the GP patient survey who were satisfied with the appointment (or appointments) they were offered	46.2%	71.9%	Variation (negative)
The percentage of respondents to the GP patient survey who responded positively to the overall experience of making an appointment	28.5%	48.6%	Variation (negative)

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

Hartley Parish Council wish to see the Settlement Hierarchy, 2025 methodology amended to include an 800m buffer around services rather than 1200m and the points awarded for neighbouring services and facilities adjusted accordingly.

Hartley Parish Council seek evidence that the District Council has confirmed with statutory infrastructure providers and other services that the impact of the proposed scale of development at Hartley and New Ash Green on the local infrastructure (including the transport network, community facilities and services) would be acceptable.

Hartley Parish Council seek the following amendments to Policy ST1 (**additions**, ~~omissions~~):

Development should be focused within the boundaries of existing settlements, including building at optimised densities and prioritising the use of previously developed 'brownfield land' ***within or adjacent to settlements where the existing use is no longer viable or required to maintain sustainable development.*** ~~There will be a particular focus on Sites~~ ***should be located*** ~~that are~~ close to services and facilities and/or well-connected by public transport, walking and cycling. Major schemes will be required to demonstrate they have made best and most efficient use of land, deliver social value and take account of all relevant evidence base documents.

Development proposals will be expected to comply with the place-making proposals ***included in site allocation Policies*** and ~~priorities listed in the supporting text and Neighbourhood Plans.~~

The main towns within the District – Sevenoaks, Swanley and Edenbridge, will sequentially be the focus for development, having regard to their role and function, with more moderate development within the Service Settlements. There will be small scale limited development and infilling in villages and hamlets.

Sustainable patterns of development will be promoted by amending Green Belt boundaries only in 'exceptional circumstances', where 'grey belt' sites have been identified which have good access to services and facilities, including ***by*** public transport, ***walking and cycling*** and their release has limited impact on the purposes of the Green Belt. This is likely to be on the edge of higher-tier settlements, ~~adjacent to train stations and/~~ or a free-standing settlement.

In other locations priority will be given to protecting the rural character of the District. Development within the National Landscape (previously AONB) will be limited to that which can be accommodated whilst still conserving and enhancing its key characteristics, this being mostly small-scale, only promoting larger proposals where exceptional circumstances and public interest are demonstrated.

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.

Hartley Parish Council prefer Option 2.

The Parish Council consider Option 2 provides housing in a location that is well served by good transport infrastructure, albeit it would need improving, and would form a critical mass to enable the provision of other necessary infrastructure and services. It is close to public transport facilities which could be improved. Subject to final assessment, the Parish Council consider the site does not strongly contribute to Green Belt purposes a, b or d as set out in the NPPF. It would be for the District Council to conclude that the public interest of providing significant housing development would meet the criteria set out in the NPPF (Para.190) related to major development in the National Landscape.

Policy ST2 – Housing and Mixed Use Site Allocations

HART 2 Land at Brambledown and Wellfield, Hartley

Hartley Parish Council support the allocation of HART 2: Land at Brambledown and Wellfield, Hartley.

This brownfield site lies within the urban confines of Hartley comprising two areas occupied by residential garages and the other residential dwellings, Wellfield Community Hall and amenity green space.

The proposal will result in the loss of some residential units and this reduction should be discounted from the net capacity of the site.

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

The Regulation 19 Local Plan should reduce the number of dwellings allocated on this site by the number to be demolished as part of the redevelopment.

The Regulation 19 Local Plan should contain a development brief for this site which requires:

- The community hall facilities to be replaced with a hall of at least the same size and standard
- A thorough assessment of the capacity of the existing local infrastructure and services and provision, and/or significant contributions towards, any shortfall in infrastructure
- No net loss of amenity open space as a result of the development, with further enhancement as a result of tree planting and further landscaping, and
- A contaminated land assessment should be required given the former uses as substation and garages
- Satisfactory assurance regarding the relocation of existing residents during redevelopment, and/or confirmation that they will be offered accommodation in the new development

HART 4 Land at Ash Road, Hartley

It is understood that Planning Application No. 25/01356/FUL for the erection of 9 custom build dwellings together with access, associated landscaping and infrastructure has been granted planning permission by the District Council. Hartley Parish Council objected to the Planning Application.

The revised planning status of the site nullifies the opportunity to comment on this proposed allocation.

As Land at Ash Road, Hartley will no longer be a Local Plan allocation, there is no requirement for the District Council to amend the Green Belt boundary in this location.

The NPPF states that, when defining Green Belt boundaries, plans should 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'. (Para.149). The Planning Application site is located immediately south of the established well defined Green Belt boundary to Hartley which comprises dense woodland and a row of mature trees.

The Parish Council support the retention of the existing Green Belt boundary in this location and would strongly object to any amendment.

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

The revised planning status of the site nullifies the opportunity to make any changes to the proposed policy/site.

HART 6 Land adjacent to Banckside and Downs Valley, Hartley

Hartley Parish Council strongly object to this proposed allocation which directly abuts the Parish boundary.

Green Belt Boundary

In order to allocate this site for housing development, the emerging Local Plan would need to propose its release from the Green Belt. The NPPF states that, when defining Green Belt boundaries, plans should 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'. (Para.149). There is no strong readily recognisable physical feature which would define the proposed new edge of the Green Belt that would be likely to be permanent. The Sustainability Appraisal, 2025 records that there are clear concerns regarding securing a new Green Belt boundary in relation to this site. The proposed allocation would therefore not be consistent with national policy.

Landscape Impact

Partly due to the absence of any recognisable green belt boundary, development would be likely to have an adverse impact on the sensitive landscape character of the Lower Fawkhams Valley, important public views and the setting of the Grade 1 St. Mary's Church (dating from the 12th Century) as well as Baldwin's Green Conservation Area. The Parish Council is very concerned that development would be visible from the valley sides and potentially from the valley floor and/or the Conservation Area/setting at Baldwins Green, less than 400m distant.

The Sustainability Appraisal includes the concern that development at Hartley would not be of a scale sufficient to deliver new community infrastructure to the benefit of Hartley (Para. 5.4.55). There is real concern about the landscape impact if the proposed allocation site were extended westwards to create a scale sufficient to deliver new community infrastructure.

The District Council's Landscape Sensitivity Assessment, 2017 states that while the area assessed as Hartley/New Ash Green West in which this site is situated has an overall sensitivity assessment of low-medium for residential development: "The dramatic steeper slopes of the dry valley... have higher sensitivity" and that "the slopes in the west of the area are more visually prominent and thus more sensitive". It further goes on to provide guidance to 'ensure any new built development is well integrated into the landscape' and 'protect the setting of valued heritage assets including the Conservation Area at Baldwins Green.'

The Hartley Local Landscape Character Assessment, 2022 identifies the site as being within the Lower Fawkhams Valley Local Landscape Character Area. The noted valued landscape qualities include:

- Prominent non-developed slopes which contribute to views and sense of place.
- The strongly-rural character.
- Open/ treed horizons which reinforce the rural character of the LLCA (properties in Hartley are not visible from Valley Road, and only limited rooftops may be

glimpsed from the footpath below Churchdown Wood on the opposite side of the valley).

- Baldwin's Green Conservation Area (and the Listed St Mary's Church building within it) and their settings, which create a strong and much appreciated sense of place and history.
- Notable views within the LLCA and also beyond as far as London to the west.

The NPPF states that planning policies should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside (Para. 187). This is clearly defined in the Landscape Sensitivity Assessment, 2017 and the Hartley Local Landscape Character Assessment, 2022.

Regulation 18 Local Plan Policy NE1 - Landscape and National Landscapes – states: 'The landscape character of the District's countryside, outside of the National Landscapes, should be conserved and, where possible, enhanced. All proposals should have regard to and be informed by the relevant national character area profile, the Sevenoaks Landscape Character Assessment 2017 and where applicable, any local landscape character assessment...'

The Parish Council will shortly be consulting on a Regulation 14 Neighbourhood Plan with policies on visual intrusion and preservation of the local landscape character. Nevertheless, the made Fawkham Neighbourhood Plan already contains policies which are relevant to this site.

Policy FNP1 – Protection and Enhancement of Landscape Character - states that a proposal for development will only be permitted where it would:

- a) be informed by, and contribute to, local landscape character;
- b) respect the landscape qualities of the Lower Fawkham Valley Local Landscape Character Area;
- c) ensure development would not visually intrude onto the undeveloped horizons and undeveloped slopes of the Lower Fawkham Valley.

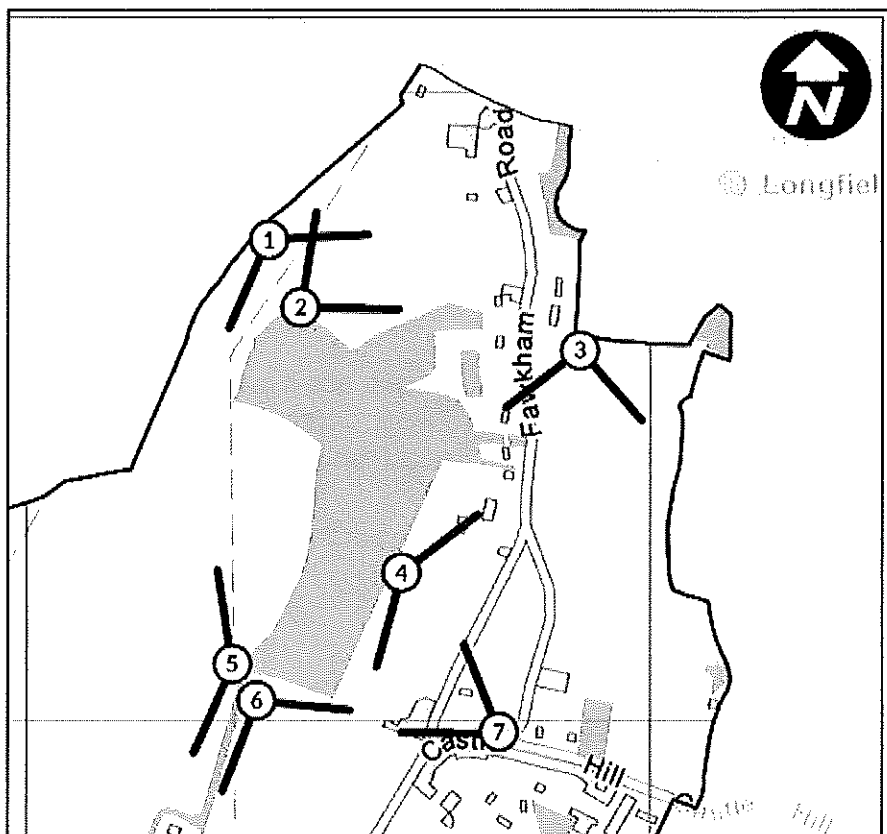
Development of the allocation site would not respect the landscape qualities or ensure development would not visually intrude onto the undeveloped horizons and undeveloped slopes of the Lower Fawkham Valley Local Landscape Character Area. In particular, with no well defined boundary, development would detract from the strongly rural character of the valley. Currently, properties in Hartley are not visible from Valley Road, and only limited rooftops may be glimpsed from the footpath below Churchdown Wood on the opposite side of the valley. The proposal would not be consistent with national policy or in compliance with emerging Local Plan Policy NE1 or Fawkham Neighbourhood Plan Policy FNP1.

Impact on Important Local Views

Policy FNP1 also states that proposals for development should maintain and not adversely impact the distinctive views of the surrounding countryside from public vantage points, in particular the Important Public Views defined in Map 2. Due partly to the absence of any strongly recognisable boundary and the local topography, development of the proposed allocation site would be likely to have a significant adverse impact on three of the defined

important public views. The impact would be more significant if the proposed allocation site were extended westwards to create a scale sufficient to deliver new community infrastructure.

1	Looking east south east from PROW SD160 close to the Parish boundary, north of Churchdown Wood.	Looking towards Churchdown Woods (a Local Wildlife Site and Ancient Woodland) across a typical North Downs landscape of fields and blocks of woodland, with further Ancient Woodland on the left. Representative of the 'Prominent non-developed slopes', 'open/treed horizons' and 'strongly rural character' valued landscape qualities described in the Landscape Character Assessment for the Lower Fawkham Valley Local Landscape Character Area.
3	Looking south from woodland edge on PROW SD212.	Eastern side of the Lower Fawkham Valley with view of church meadow, Churchdown Wood (Local Wildlife Site, Ancient Woodland) and further woodland. Representative of the 'Prominent non-developed slopes', 'open/ treed horizons' and 'strongly rural character' valued landscape qualities described in the Landscape Character Assessment for the Lower Fawkham Valley Local Landscape Character Area. The view encapsulates the character and setting of Baldwins Green Conservation Area, including St Mary's Church (Grade I listed), forming part of 'the treescaped setting of the church' and demonstrating the 'rural qualities of the area' noted in the Conservation Area Appraisal.
4	Looking east/south east across the valley from the edge of Churchdown Woods on PROW SD160	Views across from the western valley side to the eastern valley side of the Lower Fawkham Valley and into the Central Fawkham Valley showing fields, the church meadow and hedgerow (church obscured by trees in summer), and woodland (some ancient woodland). Typical chalk downland view. Representative of the 'Prominent non-developed slopes', 'open/treed horizons' and 'strongly rural character', and of the 'dominance of landform and vegetation, rather than buildings', 'views across the valley from viewpoints on valley-side footpaths' and 'strongly-rural...with little settlement' valued landscape qualities described in the Landscape Character Assessment for the Lower Fawkham Valley and Central Fawkham Valley Local Landscape Character Areas, respectively. One of the 'particularly striking views' mentioned in the Landscape Character Assessment. The view encapsulates the character and setting of Baldwins Green Conservation Area, including St Mary's Church (Grade I listed) forming part of 'the treescaped setting of the church' and demonstrating the 'rural qualities of the area' noted in the Conservation Area Appraisal. St. Mary's church spire can be seen within the view during winter months.



Extract from Fawkham Neighbourhood Plan Map 2

Impact on heritage assets

Baldwins Green Conservation Area includes the loose knit cluster of historic buildings at the junction of Valley Road and Castle Hill, including the Grade 1 Parish Church of St Mary. The Conservation Area and Grade 1 listed building has a generally open setting. The ancient woodland, historic field pattern, important hedgerows, open character and tranquillity all contribute to the significance of the Baldwins Green Conservation Area. Local topography and the absence of development means that views from the Conservation Area are uninterrupted.

Emerging Local Plan Policy HEN1 - Protecting and Enhancing the Historic Environment – states:

'Development proposals affecting heritage assets will conserve, and where appropriate enhance, the District's historic environment through positive management of development affecting heritage assets, including change within the setting of heritage assets, to ensure they are conserved in a manner appropriate to their significance.'

Fawkham Neighbourhood Plan Policy FNP8 - Heritage – states:

'The open rural character of Baldwin's Green Conservation Area and its setting should be preserved and enhanced. Any development should be designed to a high quality and retain those ... open spaces, trees and views which make a significant contribution to the character of Baldwins Green Conservation Area.'

Development within the proposed allocation site which would be visible on the prominent ridgeline to the east from the Conservation Area and Church would not preserve and enhance their setting and would be contrary to Local Plan Policy HEN1 and Neighbourhood Plan Policy FNP8. The harm on these heritage assets would be greater if the proposed allocation site were extended westwards to create a scale sufficient to deliver new community infrastructure.

Transport Impact

The SHELAA, 2025 states: 'The site would require a new access, and it is currently considered that there is limited capacity on the transport network, which would require further consideration should this site move forward in the Local Plan process.'

No evidence has been presented to demonstrate that the impact of the proposed scale of development on the local transport network would be acceptable.

Groundwater Source Protection Zone

The site is located within Zone 1 of a Groundwater Protection Zone and no evidence has been presented to demonstrate that the impact of the proposed scale of development on the supply of water would be acceptable.

Best and Most Versatile Agricultural Land

The Parish Council consider this site to be good quality agricultural land which should be recognised in the assessment for suitability in accordance with the NPPF (Para. 187).

Community Facilities

The Sustainability Appraisal includes the concern that development here would not be of a scale sufficient to deliver new community infrastructure to the benefit of Hartley (Para. 5.4.55).

As well as development at Hartley, the Parish Council express real concern about the impact of the proposed development in New Ash Green (1261 dwellings), in particular on traffic volume and impact on the doctor's surgery (which already serves Hartley, Fawkhams and New Ash Green), schools and other services.

The last CQC Inspection of the Jubilee Medical Group on 17 May 2023 is set out below:

Indicator	Jubilee MG	England Avg	Comment
The percentage of respondents to the GP patient survey who responded positively to the overall experience of their GP practice	35.8%	72.4%	Significant variation (negative)
The percentage of respondents to the GP patient survey who responded positively to how easy it was to get through to someone at their GP practice on the phone	7.1%	52.7%	Significant variation (negative)

The percentage of respondents to the GP patient survey who were satisfied with the appointment (or appointments) they were offered	46.2%	71.9%	Variation (negative)
The percentage of respondents to the GP patient survey who responded positively to the overall experience of making an appointment	28.5%	48.6%	Variation (negative)

Hartley Parish Council are concerned that development proposed at Hartley and New Ash Green will not take into account the capacity of existing infrastructure and services and provide and/or contribute significantly towards the provision of infrastructure made necessary by the development.

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

Hartley Parish Council seek the deletion of housing allocation HART6.

If the District Council continue to propose this sites within the Regulation 19 Local Plan, the developable site area and hence dwelling capacity should be reduced to allow for:

- a wide and substantial tree belt along the western boundary which would be effective all year round at screening development from the Fawkham Valley, Important Public Views and the Baldwins Green Conservation Area and Grade 1 listed St Mary's Church whilst also providing a recognisable and permanent revised Green Belt Boundary
- a suitable buffer to ancient woodland
- SUDs or other measures to protect the Groundwater Source Protection Zone
- Biodiversity net gain

The Parish Council will require a thorough assessment of the capacity of the existing infrastructure (including the transport network) and services to serve development not only in Hartley but also New Ash Green and reassurance that provision, and/or significant contributions towards will be made for any shortfall in infrastructure.

In addition, if taken forward to Reg 19 consultation, the Parish Council would expect the development brief for this site to take into consideration the policies within the Fawkham Neighbourhood Plan, including Policies:

FNP1 - Protection and Enhancement of Landscape Character. The siting, scale, roofscape, orientation and materials of any built development must be informed by, and respect, the landscape qualities of the Lower Fawkham Valley Local Landscape Character Area and demonstrate that proposals would not visually intrude onto the undeveloped horizons and undeveloped slopes of the Lower Fawkham Valley at all times of year. Development must be set back from the ridgeline behind a wide and substantial tree belt along the western boundary.

FNP 2 – Woodland, Trees and Hedgerows. Development should protect adjoining Ancient Woodland with adequate protection zones and buffers and prevent damage to root systems, and plant an appropriate mix of native species.

FNP4 – Conserve and Enhance Biodiversity. Development should preserve and enhance the Local Ecological Network as shown on Map 4 and link existing hedgerows and woodlands to the north and south of the site whilst enhancing biodiversity through a minimum of 10%

Biodiversity Net Gain - focusing on protected and priority species known to be present in the Parish.

FNP5 – GSPZ given the location in zone 1.

FNP6-Surface Water Flooding.

FNP 8 -Heritage. Development should avoid harm to the setting of St Mary's Church and Baldwin's Green Conservation Area.

Policy FNP14 - Securing Infrastructure – Developers must ensure sufficient capacity in the physical infrastructure (including the local transport network), community facilities (including doctors' surgeries and schools) and green spaces and make significant contributions towards any shortfall.

Policy H2 - Provision of Affordable Housing

The Parish Council is aware of some demand for affordable housing within the parish and support the principle of this policy. There appear to be significant opportunities for developers to demonstrate that the provision of affordable housing, or provision on site, is not viable – with a financial contribution accepted in lieu. In a District where housing land supply is highly constrained, the Parish Council consider it important that developers provide a proportion of the dwellings on their site rather than financial contributions in order to increase the supply of locally-available affordable homes.

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

The Parish Council seeks revised policy wording which increases on site provision of affordable housing and reduces the opportunity for financial contributions in lieu.

Policy H3 - Housing in Rural Areas

The Parish Council is aware of some demand for affordable housing within the parish and support the principle of this policy. As currently worded, the policy allows the provision of market housing on exception sites to be justified by the need for affordable housing (as set out in the NPPF, Para. 82).

The Parish Council object to the inclusion of housing register data within Criterion 1a) as it reflects a '*want*' to live in a certain location, rather than a *need*. Local need should be identified through a current local housing needs survey.

The Parish Council object to criterion 1b) as it omits reference to the need for an adjacent parish to represent a sustainable location. Policy H8 1a) states that sites for Self-build and Custom Housebuilding should be 'located sustainably, within or adjacent to existing settlements, with access to public transport and active travel options, to be informed by the most recent Settlement Hierarchy methodology'. It is illogical that this criterion applies to Self-build and Custom Housebuilding and not housing on exception sites in rural areas.

Para. 2.18 states: 'The delivery of new development will be dependent on the availability of suitable sites.' However, Policy H3 gives no definition of suitable sites. This Policy is likely to replace Core Strategy Policy SP 4 - Affordable Housing in Rural Areas which states:

'c. the proposed site is considered suitable for such purposes by virtue of its scale and is sited within or adjoining an existing village, is close to available services and public transport, and there are no overriding countryside, conservation, environmental, or highway impacts. The initial and subsequent occupancy of sites developed under this policy will be controlled through planning conditions and agreements as appropriate to ensure that the accommodation remains available in perpetuity to meet the purposes for which it was permitted.'

The Parish Council object to Policy H3 as it contains insufficient guidance on the composition of 'a thorough site options appraisal' and how the suitability of sites will be assessed.

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

The Parish Council wish to see the following amendments (~~deletions~~; **additions**):

1. Proposals for new housing development in rural areas that meet a specific local need will be required to meet the following criteria, in order to be permitted as an exception to other Local Plan policies:

a. A local need has been identified, ~~e.g. in a current local housing needs survey, Housing Register data or other evidence of need approved by the Council;~~

b. The local need identified cannot be met by any other means through the development of non-Green Belt sites within the parish or, where appropriate **and located sustainably**, in the adjacent parish;

c. ~~A thorough site options appraisal has been carried out.~~ ***The proposed site is considered suitable for such purposes by virtue of its scale and is sited within or adjoining an existing village, is close to available services and public transport, and there are no overriding countryside, conservation, environmental, or highway impacts. The initial and subsequent occupancy of sites developed under this policy will be controlled through planning conditions and agreements as appropriate to ensure that the accommodation remains available in perpetuity to meet the purposes for which it was permitted.***

Given the rural nature of the District, it would be appropriate for Policy H3 to be a Strategic Policy.

Policy H6 Smaller Sites

Policy H6 requires development of sites of up to 1ha to demonstrates that it makes the best and most efficient use of land, meets identified development needs and contributes towards the delivery of different types and sizes of new homes and provides high quality homes built to high sustainability standards.

The principle of the policy is acceptable but the Parish Council object to the current wording which requires proposals to demonstrate that they make the best and most efficient use of land, utilising higher densities where appropriate, but does not require any design criteria related to the site's context to be met. Without the latter to balance the criteria seeking efficient use of land and higher densities, it is difficult to see how the policy's aim of achieving well-designed new places will be achieved.

The NPPF (Para. 135) emphasises that as well as optimising the potential of a site planning policies should at the same time ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting. Local Plan Para. 2.35 states that the Local Plan sets a clear expectation for new residential development to make the best and most efficient use of land and respect local character.

The Parish Council queries the justification for limiting the application of the policy to sites of no larger than 1 hectare. The substantial weight given by the NPPF to the value of using suitable brownfield land within settlements for new homes, and the aim of minimising any loss of Green Belt land, there appears to be no reason for restricting the opportunities covered by this policy to only sites of up to 1ha.

The Parish Council support the requirement that any loss of employment, retail or community use be robustly evidenced and re-provided where required. Nevertheless, Parishes will have, or will prepare, Neighbourhood Plans which will designate sites where a loss of use to housing would be inappropriate (for example Open Spaces, Neighbourhood and Village Centres, existing business sites, community assets, locally listed buildings). In such cases, neither robust evidence nor re-provision is likely to be acceptable. The Parish Council would support further amendment of criterion 1c).

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

As a minimum, Policy H6 should add a further criterion which reiterates the requirements of Core Policy Strategy Policy SP 1 that sites will be required to respond to the distinctive local character of the area in which it is situated. In addition, Policy H6 should cross-reference the other design policies within the emerging Local Plan. In this way, Policy H6 will incorporate the strong emphasis within the NPPF and the National Design Code placed on well designed places and enable a more balanced approach to assessing the appropriateness of development proposals.

The Parish Council would support further amendment as follows (*addition*):

1 c. Any loss of employment, retail or community use ***should not conflict with other Local or Neighbourhood Plan policies which seek retention of the use and, where acceptable, should be*** ~~is~~ robustly evidenced and re-provided where required;

Policy H7 Housing Density and Intensification

The proposed density guidelines of 150 dwellings per hectare are reasonable in highly sustainable locations including town centre locations and close to transport hubs and 50-150 dwellings per hectare in existing built up areas. The historic centres of many of the district's built up areas are built to higher densities and new development should respond to the character of these areas. In addition, such locations are highly suitable for smaller (1 – 2 bedroom) dwellings which the Targeted Review of Local Housing Needs, 2025, reveals makes up a substantial proportion of all housing need in the District (particularly within social/affordable housing (20-25%) and affordable home ownership (25-30%).

The Parish Council strongly object to the proposed edge of the urban confines of higher tier settlements density of 40-60 dwellings per hectare as it represents an inappropriate strategy for the Plan area and the edge of Hartley in particular and is potentially not in accordance with Government policy.

Whilst the densities are currently expressed as guidelines and subject to the absence of detrimental impacts on local character or amenity, there is no point in including such illustrative guidelines for edge of the urban confines of higher tier settlement sites unless they are considered achievable in the majority of cases.

The Government places significant emphasis on well-designed places.

Para 135 emphasises that, as well as optimising the potential of a site, planning policies should at the same time ensure developments are able to add to the overall quality of the area, are visually attractive as a result of good layout and appropriate and effective landscaping and are sympathetic to local character and history, including the surrounding landscape setting.

There are too many examples of hard edges to settlements where intrusive suburban or urban development of uniformly sized, closely-spaced dwellings resulting in a cramped, overdeveloped appearance with poor reference to the rural character at the edge of a settlement. There is often inadequate space for significant planting between buildings, roads/footpaths, visibility splays, driveways, open space, biodiversity net gain etc. Gardens will normally be small or non-existent.

The majority of the Plan area is located in a National Landscape or forms part of its setting. The NPPF (Para. 189) states that great weight should be given to conserving and enhancing landscape and scenic beauty of National Landscapes which have the highest status of protection in relation to these issues. The Management Plans also seek to conserve the setting of the National Landscape. In addition, outside the National Landscape the District comprises attractive and distinctive countryside including within Hartley Parish.

The optimal density in edge of settlement locations should not be so high that they are not sympathetic to local character, especially the surrounding landscape setting. There must be space for development (including roads, parking and other hard surfaced areas) to avoid harmful impacts on existing trees (including Ancient Woodland and those protected by TPO's) and hedgerows and their Root Protection Areas, allow biodiversity corridors and sufficient biodiversity net gain, provide substantial landscaping within the site and to ensure a successful transition of development into open countryside. Only by setting a density which ensures such development is achievable will development become more acceptable to communities. A net density of 30 dwellings per hectare for development at the edge of the urban confines of higher tier settlements would allow a more successful transition between the built up area and the open countryside.

The Parish Council strongly object to the proposed edge of settlement density of 40-60 dwellings per hectare as it represents an inappropriate strategy for the Plan area and the edge of Hartley in particular and is potentially not in accordance with Government policy. Policy H7 is therefore not justified.

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

The Parish Council would support an alternative approach to Policy H7 as follows (~~deletions~~; **additions**):

2. Proposals are expected to adhere to the following guidelines, where they can be achieved without a detrimental impact on local character or amenity:

- In highly sustainable locations including town centre locations and close to transport hubs, densities in excess of 150 dwellings per hectare should be achieved;
- In existing built up areas, densities of 50-150 dwellings per hectare should be achieved;
- At the edge of the urban confines of higher tier settlements, densities of ~~40-60~~ **30** dwellings per hectare should be achieved; and
- Within and at the edge of villages and rural locations, densities of ~~30-60~~ **20-30** dwellings per hectare should be achieved

Policy H8 Self Build

The Parish Council support Policy H8, including criterion 1a)

Policy GT2 Gypsy and Traveller and Travelling Showperson Accommodation

The Parish Council object to the absence of reference to Neighbourhood Plan policies in considering the location of sites/ yards.

The Parish Council support the requirement for a site/yard to be located close to services and facilities and access to public transport.

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

The Parish Council would support alternative wording to Policy GT2 as follows (*addition*):

1. Accommodation for Gypsies and Travellers on residential and transit pitches on sites and Travelling Showpeople on plots on yards must take account of the policies within the Local Plan *and Neighbourhood Plans* and the latest national policy. Proposals will be supported where they meet the following criteria...

Policy EMP1 Delivering Economic Success

The Parish Council strongly support Objectives OB16 and OB17.

The Parish Council strongly support recognition given in the policy to safeguarding and optimising existing employment land, diversifying the rural economy and enhancing tourism.

The Parish Council strongly object to the absence of the policy to strengthen the rural economy which appeared in the Regulation 18 Local Plan 2023. The rural economy is important to Sevenoaks District and its future health is dependent on more than diversification.

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

The Parish Council would support alternative wording to Policy EMP1 as follows (*addition*):

1 h. ***Strengthening and*** diversifying the rural economy

Policy EMP2 New Employment Land

HART7 - Hartley Breakers Yard, Hartley Bottom Road

The previously developed site comprises a scrap yard. The site is surrounded by countryside and abuts a public footpath. The allocation of this site presents the opportunity to regularise the uses and appearance of the site. The site is accessed by narrow lanes.

The Parish Council only support the allocation of this site for employment uses B8 and E.

The Parish Council object to the inclusion of General Industry (B2) as an appropriate use on this site given the location in open countryside, adjoining a public footpath and with restricted vehicular access. In addition, it is noted that the site adjoins proposed housing allocation NAG7 where the introduction of B2 Uses would have an adverse impact on residential amenity.

The Development Brief for this site should require development and landscaping measures which would respect the countryside setting.

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

The Parish Council seeks the use of the site for B8 and E Uses only.

The Development Brief for this site should require development and landscaping measures which would respect the countryside setting.

Policy EMP3 Retaining and Optimising Existing Employment Land

The Parish Council strongly support Objective OB16: Safeguard and optimise the use of existing employment land and the principle of Policy EMP3.

The Parish Council strongly object to criterion 3a) as this, by itself, cannot provide sufficient justification for the loss of employment land.

The Sevenoaks Economic Needs Study - 2025 Update recommends that commercial land and premises should be retained unless it can be demonstrated that the use is no longer feasible or viable. In addition, it recommends continuing to work with rural landowners ... to formulate specific policies that will encourage the growth and development of the rural economy, reflecting its key role in the District.

Based on this evidence and Local Plan Strategic Objectives, Local Plan Policy EMP1 - Delivering Economic Success states:

'1. The Council will seek to ensure that proposals for economic development in the District contribute to the delivery of economic success by:
e. Safeguarding and optimising existing employment land to meet the needs of a modern economy and increase the attractiveness of Sevenoaks District as a business location...'

Similarly, Policy EMP3 Retaining and Optimising Existing Employment Land states:
'1. Any proposal that would undermine or diminish the role and function of designated employment land, as shown on the proposals map, will not be permitted.'

Given the supply and demand for employment land, the loss of employment floorspace must at the very least be justified by an Economic Needs Study recommendation to release the site, with the land shown to be demonstrably unsuitable for its existing or last use and/or for it to be unlikely to be taken up for its continued use and no longer be viable.

Given the evidence on the assessment of future requirements for business floorspace is predicated on the retention of existing sites used for business purposes (which provides the greatest source of supply of business land relative to new allocations), it is essential that the retention of business floorspace is classified as a Strategic Policy.

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

The Parish Council wish to:

Delete criterion 3a) and consequently 4a).

Classify Policy EMP3 as a Strategic Policy.

Policy EMP4 - Rural Diversification

The Parish Council support Policy EMP4 - Rural Diversification.

Regulation 18 Local Plan 2023 included Policy EMP5 The Rural Economy which had a wider scope than diversification of agriculture or other land use businesses. The former Policy sought to support, grow and diversify the rural economy which appeared appropriate in a rural district with difficulty achieving employment floorspace.

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

Reinstate a Policy which seeks to support, grow and diversify the rural economy.

Policy TLC1 Resilient Town and Local Centres

Policy TLC1 identifies Cherry Trees as a Local Centre within Hartley.

The Parish Council strongly support the policy which seeks to resist the loss of shops and services where they are serving a local need, particularly where they are considered 'key' sustainable services in the Settlement Hierarchy, unless it is thoroughly demonstrated that the use is no longer suitable.

Policy CC3 Low Carbon and Renewable Energy

The Parish Council strongly support the reference in criterion 2a) to the cumulative impact of proposals for renewable and low carbon energy generation and storage.

The Parish Council also strongly support the reference in criterion 2b) to the priority of areas of poorer quality land over the best and most versatile land (Grades 1, 2 and 3a). However, the NPPF (Para.187) is clear that the need to recognise the economic and other benefits of the best and most versatile agricultural land relates to all types of development, not just low carbon and renewable energy development and the emerging Plan should make this a strategic requirement for major development.

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

The Parish Council wish to see reference in a strategic policy/ policies to ensure that proposals for major development will only be supported where it can be demonstrated that areas of poorer quality land have been considered in preference to those of a higher quality, with particular regard to best and most versatile land (Grades 1, 2 and 3a), unless it can be demonstrated that no appropriate land of a lower quality is available and subsequently suitable.

The Parish Council reserve any comments on Policy CC3, or suggested changes to the proposed policy, until further evidence is available.

Policy W1 Flood Risk

The Parish Council strongly support Policy W1 Flood Risk which should ensure proposals incorporate flood protection, resilience and mitigation measures appropriate to the nature and scale of the risk.

W2 Surface Water Management

Given the steep-sided valleys within the adjoining Fawckham Parish, surface water flooding can be created in the valley at times of heavy rainfall.

Hartley and New Ash Green have their water supplies from boreholes in Hartley Bottom supplied from a aquifer. The Parish is a Groundwater Source Protection Zone and the Parish Council strongly support this policy which encourages SUDs.

As currently worded, the Policy is negative about the use of SUDs in Groundwater Source Protection Zones.

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

The Parish Council would support an alternative approach to Policy W2 as follows (deletions; **additions**):

6. In Groundwater Source Protection Zones, SuDS ~~may not be appropriate unless~~ **will be acceptable where** it can be demonstrated that there would be no increased pollution of surface and groundwater sources, and appropriate mitigation measures can be implemented in accordance with Policy W3 (Water Supply and Quality).

Policy W3 Water Management, Stress and Efficiency

The Parish is a Groundwater Source Protection Zone and the Parish Council strongly support this policy which only permits development where it can be demonstrated that it would not result in the deterioration of the quantity or quality of ground and surface water resources. Where a site is within a groundwater Source Protection Zone, vulnerability zone, or where a significant adverse impact is likely, an appropriate site investigation and risk assessment will be required in consultation with the Environment Agency.

Policy DE1 Community Review Panel

The Policy proposes the use of a Community Review Panel to assess larger scale development or smaller developments which have significant impact on the surrounding area ahead of comments made by Parish and Town Councils. It is intended that this additional district-wide Panel will be made up of residents, visitors and those who work in the District and will not include representatives of other bodies or professionals in this field.

As a Panel drawn from the wider District without any background in design, it is unclear how the panel would add value to the local comments already expressed on planning applications through Parish and Town Councils. The approach is likely to delay the opportunity for Parish Councils to comment. Instead, there appears to be value in pre-application consultations with Parish and Town Councils on such development proposals. This would be the preferred democratic approach.

The Parish Council support the opportunity of the review panel to assess smaller developments which have significant impact on the surrounding area.

The threshold of the Policy should revert to the 50 dwellings included within the Regulation 18 Local Plan, 2023.

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

The Parish Council would support an alternative approach to Policy DE1 as follows (deletions; **additions**):

Proposals for new development will be required to be presented to the **Parish/Town Community Review Panel** at an early stage in the pre-application process. The following criteria for presentation will normally be applied;

- Residential developments of more than **50 400** new dwellings
- Non-residential developments of more than 10,000 sqm of floor space (gross) or mixed-use developments of an equivalent size
- At the discretion of the Council, smaller developments which have significant impact on the surrounding area for example, increase in density and changes in character and scale from the surrounding local character.

The report from the **Parish/ Town Review Panel GRP** will be submitted with the application documents along with a statement demonstrating how the comments have been incorporated into the scheme.

In cases where the applicants have not engaged with the pre-application process and therefore applications have not been seen by the **Parish/ Town Review Panel GRP**, applicants will be expected to demonstrate they have secured the views of the community and been incorporated into the scheme.

Policy DE2 - Design Advisory Panel

The Parish Council support the use of a Design Advisory Panel particularly for smaller developments which have significant impact on the surrounding area, for example, increase in density and changes in character and scale from the surrounding context, at the discretion of the Council.

The threshold of the Policy should revert to the 50 dwellings included within the Regulation 18 Local Plan, 2023.

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

The Parish Council would support an alternative approach to Policy DE2 as follows (deletions; **additions**):

New development will be required to engage with the Design Advisory Panel. The following criteria for presentation will be applied:

- Residential developments of more than **50 400** new dwellings

Policy DE3 Ensuring Design Quality

The Parish Council support this policy which applies to all sites and will seek demonstration that development meets the 10 characteristics of place, contained in the National Design

Guide and other supplementary planning documents. The Parish Council strongly support the specific reference to Neighbourhood Plan policies.

Policy DE3 should contain a requirement to comply with the relevant place-making proposals included in a site allocation, where relevant.

In addition to the Sevenoaks Landscape Character Assessment, the Parish Council would wish to see reference to Local Landscape Character Assessments (consistent with Policy NE1), the relevant conservation area appraisal and Residential Character Area Assessment Supplementary Planning Document (SPD) where applicable.

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

The Parish Council would support the addition of the following supplementary planning documents (*additions*):

- ***Local Landscape Character Assessments***
- ***Conservation Area Appraisals***
- ***Residential Character Area Assessment Supplementary Planning Documents***
- ***Place-making proposals included in a site allocation including Local Design Guidelines and Codes***

Policy DE4 Delivering Design Quality

The Parish Council support Policy DE4 which seeks to deliver high quality design of buildings and a quality public domain.

Policy DE5 Outline Planning Applications

The Parish Council support the principle of Policy DE5 which seeks a Mandatory Design Principles document that commits to the design quality of the development for applications for Outline Planning Permission of more than 100 new dwellings.

Consistent with Policy DE1, this Policy should also apply to smaller developments which have significant impact on the surrounding area for example, increase in density and changes in character and scale from the surrounding local character.

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

The Parish Council would support an alternative approach to Policy DE5 as follows (*addition*):

Applications for Outline Planning Permission of more than 100 new dwellings *and, at the discretion of the Council, smaller developments which have significant impact on the surrounding area*, must include a Mandatory Design Principles document that commits to the design quality of the development.

Policy DE6 Design Codes

Whilst the Local Plan contains a plethora of policies seeking to deliver high quality designs, the relationship between Design and Access statements (showing how proposals adhere to the principles of the National Design Guide and the 10 characteristics of place), a Mandatory Design Principles document and Design Codes (produced in accordance with the Guidance of the National Model Design Code, including place-making proposals included in a site allocation), is unclear.

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

It is important to Parish/ Town Councils and the applicant that the justification and purpose of this variety of supporting design documents is clear. Alternatively, the variety of documents and Policies could be rationalised to cover the same purpose.

Policy DE7 Design for Rural Development

This Policy will require small scale rural development sites to be designed in accordance with an emerging design guidance and is supported in principle by the Parish Council. Detailed comments are reserved until the design guidance is available. As context, the Policy should reference Local Landscape Character Area Assessments.

Policy HW1 Health and Wellbeing

The Parish Council strongly object to the following policy wording as the 1.2km distance used in Policy HW1 is not an accessible walking distance to services and facilities.

2. To support healthy and safe communities, and reduce health inequalities, new development should:

a. Be located within safe, well-lit, and accessible walking distance (1.2km) to services and facilities, where possible;

According to Active Travel England, 1.2km equates to a 15 minute walk. The 15 Minute City concept is entirely inappropriate in a rural district comprising mainly small settlements. The inappropriateness of the 1.2km threshold is compounded by the methodology which states that facilities are measured from the **edge** of settlements rather than the residential areas within the settlement, in reality making distances longer than the stated 1.2km.

Active Travel England Standing Advice Note 'Active travel and sustainable development' June 2024 states:

'2.5 A mix of local amenities should be located within an 800m walking and wheeling distance (using well-designed routes) of all residential properties or staff entrances for workplace facilities.'
(Parish Council emphasis)

This is supported by *Creating Active Environments through Planning and Design*, Sport England which criterion 5 of Policy HW1 states provides appropriate guidance. The Sport England

guidance reiterates the importance of shops, schools, community facilities, open space and appropriate sports facilities typically within a **maximum 800m distance** from existing and proposed homes, along streets and active networks (**Parish Council emphasis**).

An 800m distance equates to a 10 minute walk.

Active Travel England Standing Advice Note also provides an appropriate set of qualitative criteria:

‘2.6 Footpaths/ways to local amenities should conform to the National Design Guide standards of being safe, direct, convenient and accessible for people of all abilities, which includes but is not limited to routes that:

- have a minimum width of 2m, with limited pinch points no less than 1.5m;
- are step-free;
- have a smooth, even surface;
- have seating at regular intervals;
- are uncluttered;
- have good natural surveillance and clear lines of sight;
- have street lighting;
- have wayfinding; and
- have crossing points suitable for the speed and traffic flow of the road(s).’

In relation to access to public transport the *Standing Advice Note* recommends:

‘2.9 Most buildings within the application site should be within 400m of a high-frequency bus stop or 800m of a rail/light station or tram stop, with appropriate facilities.’ The Regulation 18 Local Plan, 2025 (Para. 2.38) correctly states that this distance should be 10 minutes (800m) rather than the 15 minutes (1.2km) quoted in the 15 Minute City concept.

In relation to other facilities, the District Council’s Open Space Study, 2018 states that almost all of the different open space typologies should be located much closer than the 1.2km walking distance advocated in the emerging Policy HW1:

Equipped/Designated Play Areas:

LAPS – 100m

LEAPS – 400m

NEAPS – 1,000m

Amenity Greenspace - 480m

Parks And Gardens - 710m

Local Natural Greenspace (2ha.) 5 Minute Walk

The inappropriateness of the 1.2km for all services within Sevenoaks District is evidenced by reference to national guidance and the Council’s own adopted standards.

For consistency with Active Travel England and the Sports Council, the use of the 1.2km (15 Minute City concept) should be abandoned.

However, the Parish Council strongly support the following policy wording as set out in the Regulation 18 Local Plan, 2025, which should be retained:

b. Create opportunities for better active travel to including provision for safe cycle and pedestrian routes, as set out in Policy T1 and T2;

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

The Local Plan should define appropriate walking distances for different facilities and services. This could be by provided by drawing together existing advice such as that set out in Para. 2.38 and the District Council's Open Space Study, 2018 or by setting out a consistent list derived from the list of services considered key to sustainability in the Settlement Hierarchy (eg post offices, schools, surgeries, recreation grounds/children's play areas).

Alternatively, a more reasonable distance consistent with national advice, Policy HW1 could adopt the 800m distance threshold (**addition/ deletion**):

2. To support healthy and safe communities, and reduce health inequalities, new development should:

- a. Be located within safe, well-lit, and accessible walking distance (**800m 4.2km**) to services and facilities, ~~where possible~~;
- b. Create opportunities for better active travel to including provision for safe cycle and pedestrian routes, as set out in Policy T1 and T2...

The approach included in this policy is fundamental to the creation of sustainable development and should be considered for inclusion in a Development Strategy Policy which clearly indicates the distribution of development proposed in the plan, and criteria for the consideration of other unallocated development. As Policy T1 Sustainable Movement Network has similar criteria to Policy HW1 and is classified as a Strategic Policy, the Draft Plan is internally inconsistent. Policy HW1 Health and Wellbeing should become a Strategic Policy.

Policy HW3 Environmental Nuisance and Pollution

The Parish Council strongly support Policy HW3, particularly reference to light pollution.

Policy HEN1 Protecting and Enhancing the Historic Environment

The Parish Council strongly support this Policy which seeks to preserve and enhance the historic environment through positive management of development affecting heritage assets, including change within the setting of heritage assets, to ensure they are conserved in a manner appropriate to their significance.

The Parish Council support the inclusion of reference to Neighbourhood Plans.

In addition to the Sevenoaks Landscape Character Assessment, the Parish Council wish to see reference made in the Policy to Local Landscape Character Assessments (consistent with Policy NE1).

As the Policy appears to relate to both built and natural heritage and therefore should recognise "important" hedgerows as designated heritage assets, including those which are of archaeological "importance" marking historic field boundaries in accordance with Hedgerow Regulations, 1997.

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

The Parish Council would support an alternative approach to Policy HEN1 as follows (deletions; **additions**):

Development proposals affecting heritage assets will conserve, and where appropriate enhance, the District's historic environment through positive management of development affecting heritage assets, including change within the setting of heritage assets, to ensure they are conserved in a manner appropriate to their significance. This includes applications affecting: Designated heritage assets, such as:

- Listed buildings;
- Scheduled monuments;
- Conservation areas; and
- Registered parks and gardens; **and**
- ***Important hedgerows marking historic field boundaries in accordance with Hedgerow Regulations, 1997.***

Proposals for development should make a positive contribution to local character and distinctiveness, and respond sensitively to change within the historic environment, taking into account national planning policy and the following policies and guidance, where applicable:

d. Other principles set out in relevant local policy/guidance, including the Kent Design Guide SPD, Local List SPD, Sevenoaks District Historic Environment Review, Conservation Area Appraisals, the Conservation Area Design Guidance SPD, Neighbourhood Plans, Sevenoaks Landscape Character Assessment or any subsequent versions, ***Local Landscape Character Assessments*** and any historic environment guidance adopted by the Council

Policy HEN2 Sensitively Managing Change in the Historic Environment

The Parish Council support the principle of this policy which will require Planning Statements, Design and Access Statements and/ or Heritage Statements to demonstrate the identification and assessment of heritage assets and their setting and ensure that new development responds positively to local historic character.

Policy HEN3 Archaeology

The Parish Council support the principle of this policy which requires an archaeological assessment where an application is located within, or would affect, an Area of Archaeological Potential or suspected area of archaeological importance and should be provided. It expresses a preference for preservation in situ unless it can be shown that recording of remains, assessment, analysis report and deposition of archive is appropriate. It also seeks opportunities which should be taken for the enhancement and interpretation of archaeological remains where practicable. Developers will be required to record any heritage assets to be lost.

Policy HEN4 Locally Listed Buildings and Assets

The Parish Council strongly support this policy and the expansion of the Local List beyond Sevenoaks to the wider District. The reasoned justification makes it clear that this policy will be applicable to any future expanded Local List.

Policy NE1 Landscape and Areas of Outstanding Natural Beauty

The Parish Council strongly support this policy which now specifically seeks to conserve and, where possible, enhance the landscape character of the District's countryside outside of the National Landscapes. The Parish Council strongly support reference to local landscape character assessments. As a Local Landscape Character Area Assessment has been undertaken for Hartley Neighbourhood Plan, the policy would allow this more detailed evidence to be used as an appropriate tool for assessing proposals.

Criterion 3b) should be amended to refer to 'key sensitivities/valued attributes or qualities' as that term is used within some landscape character assessments, rather than attributes.

The Management Plans for the Kent Downs National Landscape and the High Weald National Landscape both contain a number of objectives. The Policy should include a criteria which requires proposals to demonstrate how they would make a positive contribution to the relevant objectives of the Management Plan.

Given the applicability across a large swathe of this rural district, the Parish Council strongly support this policy having the status of a Strategic Policy.

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

The Parish Council would support additional criteria to Policy NE1 as follows (**additions**):

3. Whether any of the following will be affected and if so, which ones and how:

- a. key characteristics of the landscape character area
- b. key sensitivities/valued attributes **or qualities**
- c. and any conflict with any of the landscape guidance...

National Landscapes

New criterion: **2. All proposals should demonstrate how they would make a positive contribution to the relevant objectives of the Kent Downs or the High Weald Management Plan.**

6. Development proposals in the setting of the National Landscapes should be sensitively located and designed, be consistent with National Landscape purposes **and objectives**, and in particular should not adversely affect transitional landscape character in the setting of the National Landscape and views, outlook and aspect, into and out of the National Landscapes by virtue of its location, scale, form or design. Assessment of such development proposals should have regard to the relevant AONB Management Plan and supporting documents

Policy BW1 Safeguarding Places for Wildlife and Nature

The Parish Council strongly support the policy which protects designated sites and the District's Blue Green Infrastructure (BGI). The Fawkham Neighbourhood Plan defines a Local Ecological Network on land adjoining Hartley Parish and reference should be made within the Policy to such networks.

The Parish Council object to the exclusion of reference to protected species, BAP priority species or important hedgerows within Policy BW1 or alternative policies.

Given the emphasis in the NPPF and Environment Act on this theme, the Parish Council finds it extraordinary that this does not have the status of a Strategic Policy and would strongly support a reclassification.

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

The Parish Council would support additional text to Policy BW1 as follows (**additions**):

Blue-Green Infrastructure

The District's blue-green infrastructure (BGI) network comprises a wide range of elements as detailed in the supporting text **and within Neighbourhood Plans**.

Add reference to:

protected species, BAP priority species, important hedgerows, and ancient or veteran trees

Classify Policy BW1 as a Strategic Policy.

Policy BW2 Biodiversity in New Development

The Parish Council strongly support the provision of 10% biodiversity net gain in all proposals for new qualifying development which are not exempted through regulations but wishes to see reference to protected species.

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

The Parish Council would support additional text to Policy BW2 as follows (*additions*):

Proposals should demonstrate how they have:

4. Protected and supported the recovery of *protected*, priority and threatened species, including installing appropriate ecological features e.g. swift bricks and porous boundaries.

Policy IN1 Infrastructure Delivery

The Parish Council support the principle of this policy which will require the provision of infrastructure to serve the proposed development.

The Parish Council reserve comment on the Policy until the Infrastructure Delivery Plan October 2025 Statement takes into account the following:

- it is imperative that impact of development on the GPs practice serving the Fawkham/Hartley/New Ash Green area is assessed ahead of the Reg 19 consultation
- the impact on Darent Valley Hospital, which is the local hospital for the north of the District, must be taken into consideration, and the South East London ICB needs to be consulted ahead of the Reg 19 consultation
- there are no comments regarding any potential impact on South East Water which is the water supply company for Hartley and other areas in the north of the District. Low water pressure is already an issue in some areas
- it is also important that work to identify the transport impact on local and national highways is completed, given the capacity issues already experienced in the north of the District and the rural nature of many of the highways in that area.

Policy OS1 Open Space and Recreation

The Parish Council strongly support Policy OS1 which seeks to retain the District's designated open spaces unless it can be demonstrated that the tests set out in the NPPF have been met.

Criterion 3 should be amended to include reference to development on land released from the Green Belt through plan review, or on sites in the Green Belt subject to a planning application (to accord with the 'Golden Rules' NPPF, Para. 156) whereby the proposal must include provision of new, or improvements to existing, green spaces that are accessible to the public within a short walk of their home.

The section on the potential for enhancements to existing open space where an adequate quantity of open space exists in the local area should not be limited to major development.

Other sources for open space improvements such as Neighbourhood Plans should be included in the Policy.

As open space is one of the key land uses which contributes significantly to physical and mental health, recreation, climate change mitigation and biodiversity, and published evidence recommends its retention, it is illogical that Policy OS1 is not a Strategic Policy.

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

The Parish Council would support additional text to Policy OS1 as follows (*additions*):

3. Major development proposals will be required to incorporate good quality open space, including natural or wild greenspace. ***Development on land released from the Green Belt through plan review, or on sites in the Green Belt subject to a planning application, must include provision of new green space or improvements to existing, green spaces that are accessible to the public within a short walk of their home.***
4. Where an adequate quantity of open space exists in the local area, consideration may be given to improving the quality of the existing open space to benefit new and existing residents, in accordance with the recommendations set out in the Open Space Study, ***and/or Neighbourhood Plans*** for example improving accessibility or enhancing biodiversity.

Classify Policy OS1 as a Strategic Policy.

Policy SL1 Sport and Leisure Facilities

The Parish Council strongly support Policy SL1 which seeks the retention of the existing sport and leisure provision within the District unless it can be demonstrated that the tests set out in the NPPF have been met. The Parish Council strongly support the specific reference to all indoor sports facilities, all sports pitches; golf courses; and playing fields and sites on educational establishments.

The Parish Council strongly support criteria 1a), 1b) and 1d).

The Parish Council is concerned at the potential loss of sports and leisure facilities which may be permitted by the current policy wording. The Parish Council suggests the policy should state that on land in existing sport and leisure use, there will be a presumption in favour of retaining that use.

As currently worded, Criterion 3 of the policy states that any redevelopment of sports and leisure provision must prioritise other sport and leisure uses in the first instance, followed by other non-residential employment generating uses before a residential use is considered although no methodology/criteria are given to indicate how such priorities would be assessed. It is important that rigorous tests similar to those included in Policy EMP3 are included in Policy SL1.

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

The Parish Council would support additional text to Policy SL1 as follows (~~deletions~~ **additions**):

~~3. Any redevelopment of sports and leisure provision must prioritise other sport and leisure uses in the first instance, followed by other non-residential employment generating uses before a residential use.~~ ***On land in existing sport and leisure use, there will be a presumption in favour of retaining that use. Proposals seeking to partially or wholly redevelop or convert an existing sport and leisure use to alternative uses will only be permitted where at least one of the following criteria are satisfied:***

- ***District Council to add relevant criteria from EMP3...***

Policy COM1 Protection of Community Uses

The Parish Council strongly support the principle of retaining existing service uses where they are serving a local need unless it can be demonstrated that the continued operation of the service or facility is no longer needed or financially viable.

The reasoned justification gives examples of which services and facilities are considered important to providing sustainable communities such as post offices, banks, public houses, schools (and redundant school buildings), surgeries, churches, community facilities and public transport (Para. 9.26).

The Parish Council consider it important to include an explicit viability test for all commercially provided services such as post offices, banks, public houses, and surgeries in order to ensure that the potential loss of a key community facility is robustly tested.

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

The Parish Council would support additional text to Policy COM1 to include an explicit viability test for all commercially provided services such as post offices, banks, public houses, and surgeries in order to ensure that the potential loss of a key community facility is robustly tested.

Policy T1 Sustainable Movement Network

The Parish Council support the reference to the District Council locating new development near public transport infrastructure, services and facilities to enhance sustainable places and supporting the incorporation, enhancement and creation of walking, wheeling and cycling routes and provisions within new development that is connected to the wider transport network.

See comments on Policy T2

Policy T2 Sustainable Movement

The Parish Council strongly object to Policy T2 as currently worded as it is imprecise in its requirements. The policy as expressed as it is insufficiently specific to guide development to sustainable locations and assist with climate change objectives as sought by the NPPF and emerging Local Plan. As worded, the Policy fails to satisfactorily incorporate the rudimentary tests for development as set out in the NPPF Paras. 115 - 118 in relation to safe and suitable access to the site for all users, accessibility to sustainable transport modes, impacts from the development on the transport network (in terms of capacity and congestion), or on safety.

The policy states that all new development proposals except for minor proposals should demonstrate how they link to the existing cycling and walking network within the development's vicinity, particularly to nearby services and facilities. Major development proposals should seek to improve the existing cycling and walking network, where feasible and proportionate.

There is no reference to the need to locate major development in sustainable locations in relation to accessing services and facilities by sustainable modes of transport. Indeed, sustainable connections are only to be provided where feasible and proportionate. It is unclear from the existing policy wording whether an application which cannot demonstrate a sustainable location and satisfactory links to sustainable modes of transport would be refused planning permission.

Other Local Plan policies seek to guide development to sustainable locations but none are definitively or appropriately worded to enable an unsustainably located development to be refused planning permission:

Policy ST1

'There will be a particular focus on sites that are close to services and facilities and/or well-connected by public transport, walking and cycling.

Sustainable patterns of development will be promoted by amending Green Belt boundaries only in 'exceptional circumstances', where 'greybelt' sites have been identified which have good access to services and facilities, including public transport...'

Policy CC1

'1. The Council will seek to ensure that development in the District contributes to the mitigation of, and adaptation to, climate change by:

Mitigation

- a. In accordance with the Development Strategy and national policy, being in sustainable locations which are well supported by, or capable of delivering improved local services and facilities, minimising the need to travel for day-to-day needs;
- b. In accordance with the Movement Hierarchy, maximising opportunities for active and sustainable modes of transport and, where applicable, contributing to the delivery of walking, wheeling and cycling routes...'

Policy HW1

'2. To support healthy and safe communities, and reduce health inequalities, new development should:

a. Be located within safe, well-lit, and accessible walking distance (**1.2km**) to services and facilities, where possible...'

Policy T1

'9. Support the incorporation, enhancement and creation of walking, wheeling and cycling routes and

provisions within new development that is connected to the wider transport network.'

Policy T2 provides the opportunity to clearly integrate the principles of these policies within a definitive transport policy which ensures major development is sustainably located and satisfactorily linked to sustainable modes of transport.

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

The Parish Council would strongly support the inclusion of a policy criterion within Policy T1 and/or Policy T2 which, for major development, requires safe and convenient access to sustainable modes of transport (footways, cycleways and a frequent public transport service). Whichever policy the revised wording is incorporated in would need to be classified as a Strategic Policy.

Suggested additional text to Policy T2 as follows (~~deletions~~; **additions**):

Walking, Wheeling and Cycling

3. All residential and non-residential development proposals, except for minor proposals such as extensions, small-scale internal alterations, or other works that do not materially affect site access, layout, or transport demand, should demonstrate ***that how they are sustainably located within safe, well-lit, and accessible walking distance (800m) of services and facilities and are, or will be as a result of the development, safely and conveniently*** linked to the existing cycling and walking network within the development's vicinity, particularly to nearby services and facilities.