

Response on behalf of Hartley Parish Council to Regulation 19 - Sevenoaks District Local Plan, 2026

Objection to Policy ST1 A Balanced Strategy for Growth

Policy ST1 is not justified as it is not based on appropriate evidence and consequently does not represent an appropriate strategy for Hartley.

Hartley Parish Council object to the strategy of 'moderate levels of 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 (844 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.

Classification of Hartley as a Primary Service Settlement

The Settlement Hierarchy, 2026, Methodology

Walking distance buffer

Hartley Parish Council strongly object to the 1.2km walking distance buffer used in the Settlement Hierarchy, 2026 around Hartley.

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 inappropriateness of the 1.2km threshold is compounded by the methodology which states that facilities are measured from the **edge** of settlements, in reality making distances longer than the stated 1.2km for the majority of residents who do not live on the edge of the settlement.

The 15 Minute City concept is entirely inappropriate in a rural district comprising mainly small settlements.

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 19 Local Plan, 2026 (Para. 2.54) correctly states that this distance should be 10 minutes (800m).

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 1.2km walking distance:

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 District Council's own transport consultants apply a 400m or 800m walking distance (depending on the metric) to key facilities in testing the potential of modal shift from the car (Sevenoaks Local Plan Tests Report, July 2026).

This is supported by the NPPF, 2026 which defines 'Reasonable walking distance' as follows:

'For the purpose of policies S5, L3, GB7 (relating to land around well-connected stations), this should be considered to be around 800 metres, or around 10 minutes' walk time if topography, route availability and quality or physical barriers would prevent or discourage walking from up to 800 metres away.'

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

Facilities and Infrastructure

Policy ST1 states:

Particular emphasis is placed on locations that are well served by facilities and have strong connections to public transport, walking, and cycling networks. Major development proposals must ... deliver strategic infrastructure, and respond positively to all relevant evidence base documents.

Were the more reasonable distance of 800m consistent with national advice adopted, the facilities which are readily accessible by sustainable modes of transport would be reduced. This would be particularly the case if the distance was measured from the more representative centre Hartley rather than the edge.

The facilities at New Ash Green are not within the 800m threshold, even if the measurement is taken from the edge of Hartley.

Schools

Hartley Parish Council have not seen evidence from the Local Education Authority (Kent County Council) to illustrate that the local schools have capacity to accommodate the proposed development at Hartley.

The Infrastructure Project Schedule, 2026, identifies a site for a major new 2FE primary school with 26 place nursery to serve all major development and site allocations within Hartley on the south side of New Ash Green (Policy ST4-26 Land south of Redhill Road). This critical infrastructure is located even beyond the inappropriate measure of 1.2km from Hartley along a route predicted to become more congested in the Sevenoaks Local Plan Tests Report, July 2026.

Whilst this site is considered inappropriate to serve Hartley, importantly there is currently no funding for the new primary school and no viability study to demonstrate that the major development proposals within the Hartley and New Ash Green area will be able to contribute the £15 million necessary to build the new critical primary school.

Health 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	28.5%	48.6%	Variation (negative)

The Infrastructure Project Schedule, 2026, merely states the need for a review of primary and community healthcare capacity covering Hartley and New Ash Green at the appropriate stage to identify the most effective way to accommodate additional patient demand arising from planned development.

All major development and site allocations within Hartley and New Ash Green to financially contribute. A capacity assessment will be undertaken at the appropriate stage to identify the most effective way to accommodate additional patient demand arising from planned development. Consequently, the feasibility, let alone the level of funding for future primary and community healthcare is unknown at the stage of planned growth for Hartley.

Traffic

The Infrastructure Project Schedule, 2026, identifies a new/improved bus service between New Ash Green, Hartley and Longfield Station. All major development and site allocations within Hartley and New Ash Green are to financially contribute £1.5m to provide one bus service for 5 years. There is currently no funding for a new/improved bus service between New Ash Green, Hartley and Longfield Station and no viability study to demonstrate that the major development proposals within the Hartley and New Ash Green area will be able to contribute the £1.5 million necessary to provide one bus service for 5 years. Crucially, the impact of development needs to be evaluated beyond 5 years once the developers' contributions are no longer available.

It should be noted that the Sevenoaks Local Plan Tests Report, July 2026, identifies notable increases in traffic flows on Ash Road through Hartley and, in particular, towards Longfield station at am and pm peaks even with modal shift assumptions.

The Ash Road/ Castle Hill junction is identified as a 'hot spot' within the Tests Report.

Many of the junction and link 'hot spots' identified in the 2042 Forecast Baseline persist under the 2042 Local Plan scenario. However, the additional growth generated by the proposed development sites further exacerbates capacity pressures, leading to a deterioration in performance at a number of junctions and along several corridors across the district. The introduction of modal shift assumptions (5–10%) result in only modest reductions in traffic flows, with limited impact on junction performance or journey times and key congestion issues remain.

It should also be noted that the report has been submitted in draft form and is subject to review by Kent County Council (KCC) and National Highways (NH).

Sports Facilities and Natural and Semi Natural Greenspace

The capacity of existing sports facilities also requires improvement as a result of new development. The Infrastructure Project Schedule, 2026 identifies the need for financial contributions towards improvements to the football pitches at Manor Field and the indoor and

outdoor facilities at Corinthians Sports Club and Hartley Country Club are required by all major development and site allocations within the facility catchment.

Financial contributions are also required from all major development and site allocations within a walking catchment towards improvements to the quality of natural and semi natural greenspace at Hartley Wood, the former landfill site adjoining Hartley Wood and Foxborough Wood,

Water Supply

The ability of South East Water to supply sufficient drinking water to serve the number of dwellings brought forward through the Sevenoaks Local Plan is predicted as 'a moderate or uncertain negative effect' in the Sustainability Appraisal (Para. 9.13.4).

The Infrastructure Project Schedule, 2026, states:

'Recent incidents of water supply disruption in parts of Kent, including Tunbridge Wells and Kemsing, have highlighted the importance of maintaining a resilient and reliable water supply. These events, which in some cases left customers without water for several days, are understandably of concern, particularly in the context of planned growth and the need to ensure... access to water, as a basic necessity...'

The Infrastructure Project Schedule identifies critical works to Hartley Water Treatment Works to upgrade booster pumps, install new water quality monitors and deliver new water mains for the period 2025 – 30 but does not confirm that the £2.7m scheme has been funded by the water company. Further growth will add pressure on water supply in an area already lacking water resilience.

In this context, Hartley Parish Council wishes to draw attention to the conclusion of the Sustainability Appraisal (Para. 9.13.4):

'It will be important to account for the representations received from the Environment Agency and the water companies when confirming that the plan is sound and appropriate to submit, and then when considering potential modifications as part of the Examination in Public.'

Conclusion

The NPPF (Para.11) states that all plans should promote a sustainable pattern of development that seeks to '*...align growth and infrastructure...*'.

Policy ST1 has not been robustly tested to ensure that major development proposals can deliver strategic infrastructure (the Policy rightly states that they must).

For Hartley, the feasibility, let alone the level of funding necessary for future primary and community healthcare is unknown at the stage of planned growth. The proposed new primary school is inappropriately located and its financial viability has not been tested. Similarly, the viability of a new bus service, improved sports and natural facilities have not been individually or cumulatively tested. Even if financially viable, the bus service only has a 5 year life. Meanwhile, key parts of the local road network, especially junction 'hot spots' are predicted to become more congested.

Communities are exasperated with insufficient social, green, transport and water infrastructure accompanying new development. Without an amendment to the Local Plan, Hartley Parish Council is extremely concerned that existing infrastructure issues will be compounded by new development.

For this reason, Hartley Parish Council strongly object to Policy ST1 which is not justified by appropriate evidence or consistent with national policy in enabling the delivery of sustainable development in accordance with Para.11 of the NPPF.

Changes required to Policy ST1 of the Regulation 19 - Sevenoaks District Local Plan, 2026

In order to ensure Policy ST1 is in accordance with national policy and is justified, Hartley Parish Council wish to see the Classification of Settlements methodology amended to include an 800m buffer around services rather than 1200m and the points awarded for neighbouring services and facilities adjusted accordingly.

In order to ensure Policy ST1 is in accordance with national policy and is justified, Hartley Parish Council require the Local Plan to demonstrate through appropriate evidence that major development proposals at Hartley and New Ash Green are able to deliver all of the identified critical strategic infrastructure identified in the Infrastructure Project Schedule, 2026 as necessary to serve the new development and achieve sustainable development as defined in the NPPF.

Policy ST4 Greenfield Grey Belt Site Allocations Housing and Mixed-Use

Site ST4-23 Land adjacent to Banckside and Downs Valley, Hartley

Hartley Parish Council consider Policy ST4-23 - Land adjacent to Banckside and Downs Valley, Hartley not to be consistent with national policy in relation to defining Green Belt boundaries, conserving and enhancing the natural and historic environment, and use of the best and most versatile agricultural land. In addition, Policy ST4-23 is not justified as an appropriate strategy for this site as it is inconsistent with the Local Plan Policy ST1 and Fawkhams Neighbourhood Plan Policies FNP1 and FNP8.

Policy ST4-23 not consistent with national policy

Green Belt Boundary

In order to allocate this site for housing development, the 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 reiterates the Interim Sustainability Appraisal 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.

Conserving and enhancing the natural environment

Landscape Impact

Partly due to the absence of any recognisable green belt boundary and partly as a result of its elevated location, without specific design requirements 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 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 and Fawkhams Local Landscape Character Assessments, 2022 identify 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.

There is strong visual connectivity across the LLCA, with views east-west across the valley from the upper valley sides. There is therefore strong intervisibility between Hartley and Fawkhams Parishes within this LLCA. The sloping nature of the topography means that much of the LLCA is highly visible, and there are many views from lanes, footpaths and accessible areas within it.

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 and Fawkhams Local Landscape Character Assessments, 2022.

The Development Brief includes a vision of a sensitive transition between the existing settlement edge and the open rural landscape beyond but seeks new outwards facing built form which sits harmoniously along the western boundary of the site. As worded, the Development Brief would permit outward facing development along the elevated western boundary of the site where there is no natural or permanent boundary.

The Development Brief omits any reference to the Important Public Views defined in the Fawkhams Neighbourhood Plan which should be maintained without adverse impact.

The Development Brief is not sufficiently specific about requiring a wide and substantial tree belt along the western boundary which would be effective all year round at screening development from the Fawkhams 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.

Consequently, development of the proposed 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 Fawkhams 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 proposed allocation would not be consistent with national policy.

Best and Most Versatile Agricultural Land

Figure 8.5 of the Regulation 19 Local Plan shows the site as grade 3a. As good quality agricultural land (BMV), the Parish Council consider this should be recognised in the assessment for suitability in accordance with the NPPF (Para. 187).

The site is currently in active agricultural use (the Open Spaces Study 2018 is incorrect in describing the site as part of an area of natural and semi-natural open space).

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 safe supply of water would be acceptable.

Conserving and enhancing the historic environment

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 have 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.

The NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (Para.212).

The Development Brief emphasises the importance of the setting of the Grade 1 listed Church of St Mary but the Parish Council consider the open and unspoiled setting of Baldwins Green Conservation Area to be of equal importance.

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 the setting of these heritage assets and would not be consistent with national policy.

Infrastructure Capacity

The NPPF states that plans should apply a presumption in favour of sustainable development which means that all plans should promote a sustainable pattern of development that seeks to align growth and infrastructure (Para. 11). More detailed policies for specific areas or neighbourhoods can include the provision of infrastructure and community facilities at a local level (Para.29). Plans should set out infrastructure

requirements such as that needed for education, health, transport, flood and water management, green and digital infrastructure (Para.35).

The Sustainability Appraisal reiterates the concern expressed in the Interim Sustainability Appraisal that that development of ST4-23 would not be of a scale sufficient to deliver new community infrastructure to the benefit of Hartley (Para. 5.4.68).

As well as development at Hartley, the Parish Council express real concern about the impact of the proposed development in New Ash Green (844 dwellings), in particular on traffic volume and impact on the doctor's surgery (which already serves Hartley, Fawkham, New Ash Green and Longfield), schools and other services.

Facilities and Infrastructure

Were the more reasonable distance of 800m consistent with national advice adopted, the facilities which are readily accessible by sustainable modes of transport would be reduced. This would be particularly the case if the distance was measured from the more representative centre of Hartley rather than the edge.

The facilities at New Ash Green are not within the 800m threshold, even if the measurement is taken from the edge of Hartley.

Schools

The Parish Council have not seen evidence from the Local Education Authority (Kent County Council) to illustrate that the local schools have capacity to accommodate the proposed development at Hartley.

The Infrastructure Project Schedule, 2026, identifies a site for a major new 2FE primary school with a 26 place nursery to serve all major development and site allocations within Hartley on the south side of New Ash Green (Policy ST4-26 Land south of Redhill Road). This critical infrastructure is located even beyond the inappropriate measure of 1.2km from Hartley along a route predicted to become more congested in the Sevenoaks Local Plan Tests Report, July 2026.

Whilst this site is considered inappropriate to serve Hartley, importantly there is currently no funding for the new primary school and no viability study to demonstrate that the major development proposals within the Hartley and New Ash Green area will be able to contribute the £15 million necessary to build the new critical primary school.

Health Services

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

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	MG	Avg	
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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)

The Infrastructure Project Schedule, 2026, merely states the need for a review of primary and community healthcare capacity covering Hartley and New Ash Green at the appropriate stage to identify the most effective way to accommodate additional patient demand arising from planned development. Consequently, the feasibility, let alone the level of funding for future primary and community healthcare is unknown at this stage to support planned growth for Hartley.

Traffic and Transport Network Capacity

The Infrastructure Project Schedule, 2026, identifies a new/improved bus service between New Ash Green, Hartley and Longfield Station. All major development and site allocations within Hartley and New Ash Green are to financially contribute £1.5m to provide one bus service for 5 years. There is currently no funding for a new/improved bus service between New Ash Green, Hartley and Longfield Station and no viability study to demonstrate that the major development proposals within the Hartley and New Ash Green area will be able to contribute the £1.5 million necessary to provide one bus service for 5 years. Crucially, the impact of development needs to be evaluated beyond 5 years once the developers' contributions are no longer available.

It should be noted that the Sevenoaks Local Plan Tests Report, July 2026, identifies notable increases in traffic flows on Ash Road through Hartley and, in particular, towards Longfield station at am and pm peaks even with modal shift assumptions.

The Ash Road/ Castle Hill junction is identified as a 'hot spot' within the Tests Report.

Many of the junction and link 'hot spots' identified in the 2042 Forecast Baseline persist under the 2042 Local Plan scenario. However, the additional growth generated by the proposed development sites further exacerbates capacity pressures, leading to a deterioration in performance at a number of junctions and along several corridors across the district. The introduction of modal shift assumptions (5–10%) result in only modest reductions in traffic flows, with limited impact on junction performance or journey times and key congestion issues remain.

It should also be noted that the report has been submitted in draft form and is subject to review by Kent County Council (KCC) and National Highways (NH).

The SHELAA 2026 notes that *'there is limited capacity on the transport network, which would require further consideration should this site move forward in the Local Plan process'*.

Sports Facilities and Natural and Semi Natural Greenspace

The capacity of existing sports facilities also requires improvement as a result of new development. The Infrastructure Project Schedule, 2026 identifies the need for financial contributions towards improvements to the football pitches at Manor Field and the indoor and outdoor facilities at Corinthians Sports Club and Hartley Country Club from all major development and site allocations within the facility catchment.

Financial contributions are also required from all major development and site allocations within a walking catchment towards improvements to the quality of natural and semi natural greenspace at Hartley Wood, the former landfill site adjoining Hartley Wood and Foxborough Wood.

Conclusion

The NPPF (Para.11) states that all plans should promote a sustainable pattern of development that seeks to *'...align growth and infrastructure...'*

The Local Plan has not been robustly tested to ensure that the major development allocation of Policy ST4-23 Land adjacent to Banckside and Downs Valley, Hartley can deliver strategic infrastructure (the Policy rightly states that they must).

For Hartley, the feasibility, let alone the level of funding necessary for future primary and community healthcare is unknown at the stage when development is being planned. The proposed new primary school is inappropriately located and its financial viability has not been tested. Similarly, the viability of a new bus service, improved sports facilities and greenspaces have not been individually or cumulatively tested. Even if financially viable, the bus service only has a 5 year life. Meanwhile, key parts of the local road network, especially junction 'hot spots', are predicted to become more congested.

Communities are exasperated with insufficient and delayed social, green and transport infrastructure accompanying new development.

Policy ST4-23 not justified

Policy ST4-23 is not an appropriate housing allocation as it is inconsistent with key aspects of the Local Plan Policy ST1 as well as the Fawkhams Neighbourhood Plan Policies FNP1 and 8.

Policy ST1 states:

Major development proposals must ... deliver strategic infrastructure, and respond positively to all relevant evidence base documents.

As set out with reference to consistency with national policy, it is clear from the Sustainability Appraisal that there is real concern that proposed allocation ST4-23 will not deliver conveniently and sustainably accessible strategic or local infrastructure requirements including future primary and community healthcare, a new primary school, transport infrastructure and improved sports facilities and greenspaces.

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

'c) ensure development would not visually intrude onto the undeveloped horizons and undeveloped slopes of the Lower Fawkhams Valley'.

The Development Brief for the allocation site would not ensure development would not visually intrude onto the undeveloped horizons and undeveloped slopes of the Lower Fawkhams 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.

Whilst considering landscape impact, it is important to consider the impact on important views.

Neighbourhood Plan 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.

1	Looking east south east from PROW SD160 close to the Parish boundary, north	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
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	of Churchdown Wood.	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

The proposal would not be consistent in compliance with Neighbourhood Plan Policy FNP1.

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 Baldwin's 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 Neighbourhood Plan Policy FNP8.

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

Hartley Parish Council seek the deletion of housing allocation Policy ST4-23 Land adjacent to Banckside and Downs Valley, Hartley in order to ensure the Local Plan is consistent with national policy and justified.

The Local Plan states that Parish Councils play an important role in identifying local infrastructure needs (Para.9.10) and that development briefs have been prepared for site allocations to articulate clear priorities and an ambitious vision for each site and incorporate the necessary on site infrastructure improvements and set out each site's expected contribution to the wider provision and enhancement of infrastructure required to support

sustainable growth (Para.9.9). If the Inspector is minded to retain the housing allocation within the Sevenoaks District Local Plan, Hartley Parish Council would expect:

- A Development Brief which requires:
 - a landscape-led development with areas of strategic planting linked to the Local Ecological Network (as identified in the Fawkham Neighbourhood Plan (Map 4)
 - 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
 - the use of land cut, and lower scales of development towards the western edge of the site, where necessary
 - Biodiversity net gain measures which include creating linkages between Churchdown Wood and the Ancient Woodland either side of ST4-23 to improve connectivity within the Local Ecological Network
- Provision of sufficient infrastructure improvements including primary and community healthcare and primary school facilities within walking distance of Hartley
- Financial contributions towards improvements to the football pitches at Manor Field and the indoor and outdoor facilities at Corinthians Sports Club and Hartley Country Club and green infrastructure:
 - improvements to the quality of natural and semi natural greenspace at Hartley Wood
 - interpretation boards within Churchdown Wood describing the Ancient Woodland/ Local Wildlife Site and the access routes through it
 - improvements to PPOWs by changing stiles to gates at Churchdown Wood and the routes to it

Policy ST3 Previously Developed Land Site Allocations Housing and Mixed-Use

Site ST3-2 – Fawkham Business Park, Fawkham Road

Hartley Parish Council consider Site ST3-2 Fawkham Business Park, Fawkham Road, Fawkham not to be consistent with national policy in relation to supporting a prosperous rural economy, sustainably located housing development and achieving well-designed places. In addition, Site ST3-2 is not justified as an appropriate strategy for this site as it is inconsistent with the Local Plan's Spatial Vision, Policies EMP1, EMP3, H6, T1 and T2 and contradicts the District Council's own supporting evidence.

Fawkham Business Park

Fawkham Parish Council's evidence states the Business Park comprises six buildings ranging in size from 55sqm to 831sq m, with total built form 1702 sq m, containing 9 units plus a site manager's dwelling.

The units are converted farm buildings of various construction types and ages. The majority are steel portal frames with metal profile clad roofs and walls; others are timber clad above brick with metal profile roof and solid wall construction. In addition, a farm building is converted to a site manager's dwelling.



Fawkham Business Park

Buildings occupy a limited part of the site. The site also comprises associated servicing and parking areas. The buildings are well set back from Fawkham Road behind a wide grass verge and service road. The buildings to the west of the site are cut into a rising valley slope.

Existing uses include iron work/welding; car servicing; vehicle body repairs; race car servicing and hire; sheet metal work; window manufacturers; and kitchen manufacturer/supplier/designer. Many long-term tenants; some units with bespoke fit outs.

The site has one vacant unit, which is not currently being marketed.

Fawkham Business Park provides a range of unit sizes, is in good condition and has only one vacant unit. There remains demand for this type of premises and the site contributes to local employment provision and the sustainability of the Parish.

Policy ST3-2 not consistent with national policy

Supporting a prosperous rural economy

The NPPF states that significant weight should be placed on the need to support economic growth taking into account local business needs (Para. 85) and that planning policies should enable the sustainable growth and expansion of business in rural areas both through conversion of existing buildings and well-designed new buildings (Para 88). Policies should recognise that sites to meet local business needs may have to be found in locations that are not well served by public transport but that the use of previously developed land should be encouraged.

Sustainability of location for housing

The NPPF states that when assessing the allocation of sites for development it should be ensured that:

- 'a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users' (Para. 115).*

The SHELAA, 2026 states that the site is in a sustainable location, close to key services and facilities. More detailed assessment demonstrates this not to be the case.

Hartley

The SHELAA assumes that the site location being within 250m of the urban confines of Hartley means that *'This site is therefore considered to be in a sustainable location, close to key services and facilities'*. A more detailed analysis demonstrates that this is not a sustainable location for 28 new dwellings.

In reality, the site is located a significant distance from the services of Hartley, connected by a steep gradient hill. Importantly, there are no safe, direct or convenient connections by road, footway or cycle route between Hartley and the site.

Key Facility	Distance from Fawkhams Business Park using adopted roads*	Sustainable connections**
Hartley Primary School	2,224m	No
Leigh Academy Hartley (nearest Secondary School)	1,440m	No
Hartley Post Office	1,865m	No
Cherry Trees Local Centre, Hartley	2,516m	No
Woodland Avenue Recreation Ground and play area	2,049m	No

*using adopted road connections

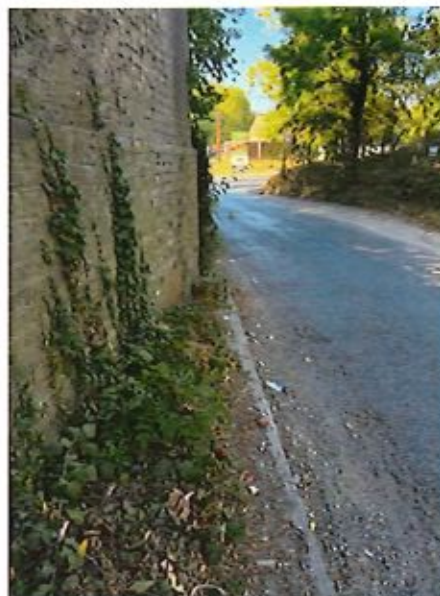
** whether there is a continuous, 2m, step-free, well lit, surfaced connection and whether the roads provide a safe environment for cyclists

Longfield

All facilities in Longfield are located to the north of the railway line (with the exception of the London-bound station platform).

Whilst the site may be within walking distance of Longfield (located within Dartford Borough) and Longfield Train Station, it is not safely connected with Longfield on foot or cycle.

The narrow tapering footway from Longfield does not extend under the narrow railway bridge into Fawkham. The footway on the Longfield side of the bridge is also on the other side of the road to Fawkham Business Park meaning pedestrians leaving the proposed allocation site would be required to cross the road to reach the footway.



Absence of footway leading from Longfield under railway bridge

The traffic using this narrow archway makes movement for vulnerable users such as pedestrians and cyclists dangerous.

A less direct alternative via the redeveloped largely brownfield Salts Farm Depot site to the east is equally impractical as a footway/ cycleway connection. This journey would require pedestrians to cross Fawkham Road where there are no footpaths, progress through the housing site and access a stepped footbridge over the railway line via a narrow, steep hoggin footpath and an unlit car park on the Bramblefields Estate. The width, gradient, surface material and footbridge make the alternative crossing inaccessible and/or unattractive for cyclists and pedestrians.



Narrow, steep hoggin footpath leading to stepped railway bridge crossing

Active Travel England Standing Advice Note provides an appropriate set of qualitative criteria for footpaths/ways:

'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).'*

This detailed assessment illustrates that there is no convenient, continuous, accessible sustainable connection between the proposed allocation site and Longfield and on site inspection shows that it is impractical or unviable for such a sustainable link to be created.

The introduction of additional housing not served by sustainable transport modes and which would result in an unacceptable impact on highway safety would not be consistent with the NPPF (Paras. 115 and 116).

Contrary to the SHELAA, 2026 conclusions, the site is not in a sustainable location in terms of sustainable modes of transport and would be inconsistent with the NPPF. The Parish Council note that the District Council refused permission in principle for a single dwelling on Land South of Salts Farm, Fawkhams Road (26/01786/PIP), c.100m south of Fawkhams Business Park, as the site is not within a sustainable location and would therefore fail to comply with Paragraph 115 of the NPPF.

Hartley Parish Council object to the site being classified as part of Hartley in order to justify the allocation within a Primary Service Settlement, rather than in a hamlet. It is sited on Fawkhams Road and located within Fawkhams Parish. The site is remote from Hartley and its facilities. Whilst the site may be within a buffer of Hartley's settlement boundary, there are no safe, direct or convenient connections by road, footway or cycle route between Hartley and the site. In planning terms, the site relates more to the hamlet of Fawkhams than Hartley.

Achieving well-designed places

Hartley Parish Council does not consider that the Development Brief for Site ST3-2 – Fawkhams Business Park (which forms part of Policy ST3) to be consistent with the NPPF. In particular, it contains no guidance from the Local Planning Authority on the interpretation of planning policies in relation to this specific site including layout of the development; scale, massing and height of buildings, landscaping; design criteria; and additional infrastructure and facilities to be provided, including off-site requirements (as advised, for example, in Government's Planning and Development Briefs: A Guide to Better Practice).

Whilst Policy DE4 - Design Guides and Codes - aims to require new development of more than 20 new dwellings to produce a Design Guide/Code as part of the application process in partnership with the Local Planning Authority and the local community, the Parish Council considers it more appropriate that guidance is given in the Local Plan in order to properly assess the appropriateness of the allocation and its capacity and to ensure the design requirements necessary to suitably accommodate development have the status of Local Plan policy.

Fawkham Business Park is set within the Lower Fawkham Valley Local Landscape Character Area as noted within the Hartley and Fawkham Local Landscape Character Assessments, 2022. One of the valued landscape qualities is its strongly-rural character (with the railway line and embankment to the north marking a distinct break from the built up area of Longfield).

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). The Government also stresses the importance of retaining the openness of the Green Belt (Para. 142).

Furthermore, the NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities and that being clear about design expectations, and how these will be tested, is essential for achieving this (Para.131).

The Development Brief for Site ST3-2 provides no guidance on how the spatial and visual openness of the Green Belt is to be maintained or how the development is to respect the landscape qualities of the Lower Fawkham Valley Local Landscape Character Area. The Development Brief is wholly inadequate in this rural location within the Green Belt and would not provide sufficient guidance. In the absence of such guidance, evidence is not available which demonstrates that an appropriate, site-specific, assessment of the capacity of this site has been undertaken. Despite this, the SHELAA, 2026 Development Brief asserts: *'The Development Brief work has assessed the capacity of this site and it is considered capable of accommodating 28 residential units.'*

A density of 42dph is proposed for Site ST3-2 Fawkham Business Park. Whilst industrial in character, the existing buildings are well set back from Fawkham Road behind a wide grass verge and service road, and, to the west of the site, are cut into a rising valley slope. The Parish Council objects to the high densities in rural areas included within Policy H7 - Housing Density and Intensification and proposes 20 – 35 dwellings per hectare at the edge of villages or rural locations. At 20 - 35dph this site would accommodate 13 - 23 dwellings. The outline planning application granted on appeal on the disused and derelict Salt Farm site opposite (at a time when the District Council did not have a 5-year housing land supply) has a more appropriate density of 34dph. A gain of 13 - 23 dwellings (or 28 dwellings if the Council's inappropriate density is applied) does not outweigh the loss of well used and suitable employment floorspace in a constrained District seeking to retain such floorspace and in a Parish with a dynamic rural economy.

Whilst the Regulation Local Plan is being examined under the provisions of the NPPF 2024, future planning applications will be appraised under the NPPF, 2026. Policy L3 (b) and (c) do not apply to this site as it is not well connected to Longfield railway station. Even if L3c were applied, a minimum density of 35 dwellings is advocated which is more appropriate for a development which must not cause substantial harm to the openness of the Green Belt (NPPF Para.154g) and which must contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside (Para.187).

Site ST3-2 not justified

Site ST3-2 is not an appropriate housing allocation as it is inconsistent with key aspects of the Local Plan Spatial Vision, Policy H6, Policies EMP1 and EMP3 and the Council's own up to date evidence.

As has been illustrated, the proposed allocation site is not well related or sustainably linked to Longfield, Longfield Station or Hartley.

Allocating a site for 28 dwellings at Fawkhams is not in compliance with the Local Plan Policy ST1 for only small-scale, limited, or infill development at hamlets where it will support rural communities and the wider rural economy.

A key aspect of the Local Plan Spatial Vision includes ensuring the delivery of the right type of employment space and supporting the rural economy.

The Local Plan states: *'Given the rural nature of Sevenoaks District, the rural economy, more so than in other areas of Kent, is integral to the success of the wider economy.'* (Para. 3.15).

The Regulation 19 Local Plan Employment and Economy Strategic Objective OB 16 is to *'Safeguard, intensify and optimise the use of existing employment land and premises, supporting their continued role in the rural economy'*, whilst Objective OB17 is to *'Support the diverse and resilient rural economy, including the growth and adaptation of rural enterprises in locations appropriate to their function.'*

To inform the economic strategy of the Local Plan, the Council commissioned an Economic Needs Study and a 2025 update. Together they form a robust assessment of the performance of the District's economy and commercial property market and determine future employment floorspace needs over the Plan period to 2042. They conclude: *'The industrial market is performing well and growing, driven in part by an increased demand for storage and distribution floorspace. This has led to minimal vacancy rates throughout the District.'* **Subject to the District not losing further business sites**, the Study concludes that an additional 14,600sqm floorspace is needed for general industry/ storage and distribution (Use Classes B2/B8) **(Parish Council emphasis)**.

As a consequence, 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 Strategic Objectives, Strategic Local Plan Policy EMP1 – Delivering Economic Success states:

'1. The Council will ensure that proposals for economic development:

e. Protect and optimise existing employment land and premises, including through regeneration, intensification and redevelopment where appropriate, to support the needs of a modern economy;'

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 Local Plan Policies Map, will not be permitted unless it can be clearly demonstrated that the proposal would not prejudice the ability to meet identified employment needs over the Plan period'.

Fawkham Neighbourhood Plan designates the proposed housing allocation as a site used for business purposes which should be retained in business use unless it can be demonstrated that there is no reasonable prospect of continued use for business purposes during the Plan period. Para 3.18 of the Local Plan makes it clear that Policy EMP3 applies to sites designated through made Neighbourhood Plans:

'Where employment land is identified or designated through made Neighbourhood Plans, it will be treated as designated employment land for the purposes of this policy. Such sites will be afforded the same policy considerations as other designated employment land, recognising the role of Neighbourhood Plans in shaping local economic priorities. These sites are identified within the relevant Neighbourhood Plan documents and are not shown separately on the Local Plan Policies Map.'

Policy EMP3 states that one of the exemptions for retaining existing employment land in Use Classes B2, B8, E(c) or E(g) away from those uses is where the land has been allocated for an alternative use through the Local Plan. Demonstrably, this allocation has not been justified for this site.

If an allocation is not made in the Local Plan, the site would only be released if:

'b. The Council's Economic Needs Study recommends the land for release;

c. The land is demonstrably unsuitable for its existing or last use (see Paragraph 3.15 for guidance on the implementation of this criterion); or

d. It is demonstrated that the existing or last use is unlikely to be taken up for its continued use by another owner/occupier and is no longer viable (see Paragraphs 3.16 and 3.17 for guidance on the implementation of this criterion).'

The SHELAA, June 2026 states:

'... existing employment sites ... were assessed in exactly the same way as the housing and mixed use sites, but with the ENS conclusions on the assessment of existing employment

sites a key factor in determining whether the existing employment uses on these sites could be lost or not.' (Para 5.3)

In accordance with Policy EMP3, the District Council normally require proposals for the change the use of existing employment land in Use Classes B2, B8, E(c) or E(g) to be evidenced by demonstrating comprehensive and professional marketing of the land at its existing use or last use at an appropriate price, taking into account existing market conditions and the condition of the land/building(s). Marketing should have been for its existing use or last use, followed by other suitable uses within Use Classes B2, B8, E(c) and E(g). It should have been carried out for a period of 12 continuous months in the case of designated employment land and 6 continuous months in the case of all other employment land, prior to the submission of an application at a time when the site was, or soon will be, available.

Marketing evidence should include examples of agents used, adverts published, dates when active marketing was carried out and information on any interest received, and why this did not result in a sale or new let. The Council may require a review of the information submitted by an independent consultant.

The proposed ST3-2 housing allocation at Fawkham Business Park, Fawkham Road, Fawkham is an existing employment site which is meeting the needs of the local economy and is important to the success of the rural economy.

In the North West Kent area the commercial property market is seen by agents as exceptionally strong, with an extremely limited supply. Units offering adequate parking are very popular. There is very high demand for workshops and storage units, especially smaller units.

Hartley Parish Council strongly object to the allocation of this business site for an alternative use without the rigorous application of the District Council's own methodology. It is unacceptable for the loss of a business site to an alternative use to be unsupported by such evidence.

Even if such tests could be satisfied, such is the importance of retaining business floorspace, that Policy EMP3 states that, in terms of alternative land uses to be considered, a wholly residential scheme is the least favoured use after all other employment generating uses and mixture of residential and employment generating use options have been exhausted.

At 0.67ha, the site qualifies as a Smaller Site under Local Plan Policy H6. However, the allocation does not comply with Policy H6 which states:

*'1. Proposals for new housing development on qualifying sites (no larger than one hectare) will be required to meet the following technical and design criteria:
c. Any loss of employment ...use is robustly evidenced and reprovided where required.'*

A robust case for the loss of this site from the supply of business sites has not been presented. The loss of 1,700 sqm of suitable business units would have a substantial impact on the supply of floorspace and in particular the local rural economy.

In relation to the loss of employment land, the District Council's Sustainability Appraisal Report July 2026 states:

'There is a clear need to maximise PDL (or 'brownfield'), in order to minimise pressure on greenfield, but this must be within reason acknowledging potential issues, including:

- *Existing uses – there is a need to apply due caution before supporting the redevelopment of existing employment land for housing or mixed use development.'*

As previously assessed, the site would fail the criteria in Local Plan Policy HW1 which states that new development should be located within safe, well-lit, and accessible walking distance to services and facilities and create opportunities for better active travel to include provision for safe cycle and pedestrian routes, in accordance with national policy and Local Plan Policies T1 (Sustainable Movement Network) and T2 (Sustainable Movement).

Local Plan Policy T2 - Sustainable Movement states that all residential development must provide a high degree of flexibility in travel mode choices, ensuring inclusive access for all users and supporting walking, wheeling and cycling options (including demonstrating appropriate links to the existing cycling and walking network in a way that improves access to nearby services and facilities) to reduce reliance on private car trips. Clearly, this cannot be achieved for the residential development proposed at the Fawkham Business Park site.

Changes required to Site ST3-2 of the Regulation 19 - Sevenoaks District Local Plan, 2026

Hartley Parish Council wish to see the deletion of Site ST3-2 in order to ensure the Local Plan is in accordance with national policy and is justified as an appropriate strategy for this site based on the District Council's own evidence and consistent with other Regulation 19 Local Plan Policies.

The Local Plan states that Parish Councils play an important role in identifying local infrastructure needs (Para.9.10) and that development briefs have been prepared for site allocations to: articulate clear priorities and an ambitious vision for each site; incorporate the necessary on site infrastructure improvements; and set out each site's expected contribution to the wider provision and enhancement of infrastructure required to support sustainable growth (Para.9.9). If the Inspector is minded to retain the housing allocation within the Sevenoaks District Local Plan, Hartley Parish Council would expect:

- A Development Brief following Government guidance and best practice which provides guidance on layout; scale, massing and height of buildings; landscape; design and infrastructure such that the spatial and visual openness of the Green Belt could be maintained and the landscape qualities of the Lower Fawkham Valley Local Landscape Character Area respected

- A lower dwelling capacity which respects the rural location within the Green Belt and the Lower Fawkham Valley Local Landscape Character Area
- Reclassification of the site to Fawkham
- Contributions towards infrastructure identified in the Neighbourhood Plan:
 - interpretation boards within the open space at Churchdown Wood describing the Ancient Woodland/LWS and the access routes through it
 - improvements to PRowWs by changing stiles to gates at Churchdown Wood and the routes to it.
 - Creation of linkages between Churchdown Wood and the Ancient Woodland either side of ST4-23 to improve connectivity within the Local Ecological Network

Policy ST3 Previously Developed Land Site Allocations Housing and Mixed-Use

ST3 - 3 Orchard Farm, Fawkham Road (Part PDL)

Hartley Parish Council consider Site ST3 - 3 Orchard Farm, Fawkham Road, Fawkham not to be consistent with national policy in relation to defining Green Belt boundaries, sustainably located housing development, minimising impacts on and providing net gains for biodiversity and achieving well-designed places. In addition, Site ST3-3 is not justified as an appropriate strategy for this site as it is inconsistent with the Local Plan's Spatial Vision, Policy T1 – Sustainable Movement Network and Policy T2 – Sustainable Movement.

Factual Amendment

This allocation on a 0.81 hectare site is in two parts, although 0.44ha of the site comprising the previously developed land (western site) has already been redeveloped with 8 bungalows (as shown on SDC's own Local Plan Policies map) (Application Nos. 23/01164/FUL and 24/02120/MMA). As redevelopment of previously developed land, the application was considered to be consistent with Green Belt policy (NPPF Para. 149g). That part of the development would not therefore require amendment to the Green Belt.

In order that the Local Plan is up to date and does not to double count the contribution of this site, the western part of the allocation should be deleted and the remaining eastern part, if retained as an allocation, should be reclassified as entirely greenfield, moved to Policy ST4, and the dwelling capacity reduced accordingly.

Not consistent with national policy

Green Belt Boundary

In order to allocate this greenfield site for housing development, the Local Plan would need to propose its release from the Green Belt. The NPPF is clear 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 railway line with embankment forms a strong readily recognisable physical boundary between the built up area of Longfield and the Lower Fawkham Valley. The Lower Fawkham Valley principally comprises fields and woodlands on both sides of the Fawkham Valley, as well as land along Castle Hill.

The proposed greenfield housing allocation site would breach the readily recognisable Green Belt boundary and there would be clear concerns regarding securing a new readily recognisable Green Belt boundary which is likely to remain permanent. Without such a clearly defined physical boundary, there is the real prospect of development creeping into open countryside along the Lower Fawkham Valley which contributes to the local landscape character, views and sense of place: Hartley and Fawkham Local Landscape Character

Assessments, 2022 (<https://fawkhamparishcouncil.gov.uk/wp-content/uploads/2023/06/Fawkhamp-Parish-Landscape-Character-Assessment-Complete-FINAL-v2.pdf>).

The Sustainability Appraisal reiterates the Interim Sustainability Appraisal that site ST3 – 3 'does not relate well to the settlement edge'.

Sustainable Location

The NPPF states that when assessing the allocation of sites for development it should be ensured that:

- 'a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users' (Para.115).*

The SHELAA, 2026 states that the site is in a sustainable location, close to key services and facilities. More detailed assessment demonstrates this not to be the case.

Hartley

The SHELAA assumes that the site location being within 250m of the urban confines of Hartley means that 'This site is therefore considered to be in a sustainable location, close to key services and facilities'. A more detailed analysis demonstrates that this is not a sustainable location for 34 new dwellings.

In reality, the site is located a significant distance from key services of Hartley, connected by a steep gradient hill. Importantly, there are no safe, direct or convenient connections by road, footway or cycle route between Hartley and the site.

Key Facility	Distance from Orchard Farm using adopted roads*	Sustainable connections**
Hartley Primary School	2,304m	No
Leigh Academy Hartley (nearest Secondary School)	1,360m	No
Hartley Post Office	1,945m	No
Cherry Trees Local Centre, Hartley	2,436m	No
Woodland Ave Recreation Ground and play area	1,969m	No

*using adopted road connections

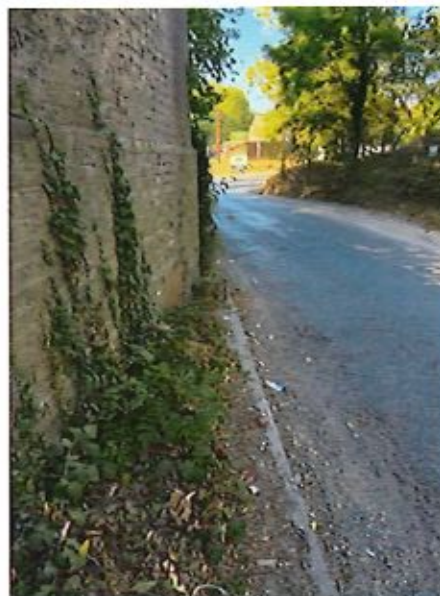
** whether there is a continuous, 2m, step-free, well lit, surfaced connection and whether the roads provide a safe environment for cyclists

Longfield

All facilities in Longfield are located to the north of the railway line (with the exception of the London-bound station platform).

Whilst the site may be within walking distance of Longfield (located within Dartford Borough) and Longfield Train Station, it is not safely connected with Longfield on foot or cycle.

The narrow tapering footway from Longfield does not extend under the narrow railway bridge into Fawkham. The footway on the Longfield side of the bridge is also on the other side of the road to Orchard Farm meaning pedestrians leaving the proposed allocation site would be required to cross the road in front of the bridge to reach the footway.



Absence of footway leading from Longfield under railway bridge

The traffic using this narrow archway makes movement for vulnerable users such as pedestrians and cyclists dangerous.

A less direct alternative via the redeveloped largely brownfield Salts Farm Depot site to the east is equally impractical as a footway/ cycleway connection. This journey would require pedestrians to cross and walk along Fawkham Road, around a bend, where there are no footpaths or street lighting, progress through the housing site and access a stepped footbridge over the railway line via a narrow, steep hoggin footpath and an unlit car park on the Bramblefields Estate. The width, gradient, surface material and footbridge make the alternative crossing inaccessible and/or unattractive for cyclists and pedestrians.



Narrow, steep hoggin footpath leading to stepped railway bridge crossing

Active Travel England Standing Advice Note provides an appropriate set of qualitative criteria for footpaths/ways:

'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)'.*

This detailed assessment illustrates that there is no convenient, continuous, accessible sustainable connection between the proposed allocation site and Longfield and on site inspection shows that it is impractical or unviable for such a sustainable link to be created.

The introduction of additional housing not served by sustainable transport modes and which would result in an unacceptable impact on highway safety would not be consistent with the NPPF (Paras. 115 and 116).

Contrary to the District Council's conclusions, the site is not in a sustainable location in terms of sustainable modes of transport and is not consistent with the NPPF. The Parish Council note that the District Council refused permission in principle for a single dwelling on Land South of Salts Farm, Fawkham Road (26/01786/PIP), around 150m south of ST3-3, as the site is not within a sustainable location and would therefore fail to comply with Paragraph 155 of the NPPF.

Hartley Parish Council object to the site being classified as part of Hartley in order to justify the allocation within a Primary Service Settlement, rather than at a hamlet. It is sited on Fawkham Road and located within Fawkham Parish. The site is remote from Hartley and its facilities. Whilst the site may be within a 250m buffer of Hartley's settlement boundary, there are no safe, direct or convenient connections by road, footway or cycle route between Hartley and the site. In planning terms, the site relates more to the hamlet of Fawkham than Hartley.

Minimising impacts on, and providing net gains for, biodiversity

In response to the site allocation in the Regulation 18 Local Plan, Natural England stated: *'The eastern parcel of HART5 [now ST3 – 3] consists of Priority Habitats Inventory – Traditional Orchard. As such, we advise this allocation should have regard for paragraph 192b of the NPPF and Policy BW2 of your Plan to conserve, restore and enhance priority habitats.'*

The NPPF (Para. 192b) states that in order to protect and enhance biodiversity and geodiversity, plans should promote the conservation, restoration and enhancement of priority habitats.

Despite such advice from Natural England, the Development Brief states: *'The eastern parcel forms an area of scrub and woodland'*. It appears that the conservation of the Priority Habitat has been ignored in allocating this site.

Achieving well-designed places

The District Council's SHELAA, 2026 appears to have incorrectly appraised the site. The two parts of the site are not separated by Fawkham Road. A railway line forms a strong boundary to the north, not residential development, with business development to the south.

The Parish Council does not consider that the Development Brief for ST3 - 3 – Orchard Farm, Fawkham Road (which forms part of Policy ST3) to be consistent with the NPPF. In particular, apart from reference to an Overhead/ Underground Cable Route, it contains no site-specific design guidance on the interpretation of planning policies in relation to this specific site including layout of the development; scale, massing and height of buildings, landscaping; design criteria; and additional infrastructure and facilities to be provided, including off-site requirements (as advised, for example, in Government's Planning and Development Briefs: A Guide to Better Practice).

The remaining undeveloped part of the allocation is a greenfield site within the Lower Fawkham Valley Local Landscape Character Area as noted within the Hartley and Fawkham Local Landscape Assessments, 2022.

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). The Government also stresses the importance of retaining the openness of the Green Belt (Para. 142).

Furthermore, the NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities and that being clear about design expectations, and how these will be tested, is essential for achieving this (Para. 131).

There is no guidance on how the spatial and visual openness of the Green Belt is to be maintained or how the development is to respect the landscape qualities of the Lower Fawkham Valley Local Landscape Character Area. The Development Brief is inadequate for this greenfield site in this rural location within the Green Belt and would not provide sufficient guidance. In the absence of such guidance, evidence is not available which demonstrates that an appropriate, site-specific, assessment of the capacity of this site has been undertaken.

As approximately half of the 0.81ha. site has been developed with 8 dwellings, the proposed allocation as currently written requires 26 dwellings to be located on the remaining site of

some 0.4ha. at a density of 65dph. The Parish Council objects to the high densities in rural areas included within Policy H7 - Housing Density and Intensification and proposes 20 – 35 dwellings per hectare at the edge of villages or rural locations. At 20 - 35dph the remaining part of this site would accommodate approximately 8 -14 dwellings, closer to the previously developed brownfield portion of the land.

Whilst the Regulation 19 Local Plan is being examined under the provisions of the NPPF 2024, future planning applications will be appraised under the NPPF, 2026. Policy L3 (b) and (c) do not apply to this site as it is not well connected to Longfield railway station. Even if L3c were applied, a minimum density of 35 dwellings is advocated but this may be lowered if less than 10 dwellings are proposed for the site and where it can be demonstrated that meeting the standard is inappropriate on a greenfield site such as this in order to retain the openness of the Green Belt and respect the landscape context of the Lower Fawkham Valley.

Policy ST3-3 not justified

Site ST3-3 is not an appropriate allocation for the Orchard Farm site as it is inconsistent with the Local Plan.

Not consistent with the Regulation 19 Local Plan

As has been illustrated, the proposed allocation site is not well related or sustainably linked to Longfield, Longfield Station or Hartley.

Allocating a site for 34 dwellings at Fawkham is not in compliance with the Local Plan Policy ST1 for only small-scale, limited, or infill development at hamlets where it will support rural communities and the wider rural economy.

Contrary to the District Council's conclusions, the site is not in a sustainable location in terms of sustainable modes of transport. The site would fail the criteria in Local Plan Policy HW1 which states that new development should be located within safe, well-lit, and accessible walking distance to services and facilities and create opportunities for better active travel to include provision for safe cycle and pedestrian routes, in accordance with national policy and Local Plan Policies T1 (Sustainable Movement Network) and T2 (Sustainable Movement).

Local Plan Policy T2 - Sustainable Movement states that all residential development must provide a high degree of flexibility in travel mode choices, ensuring inclusive access for all users and supporting walking, wheeling and cycling options (including demonstrating appropriate links to the existing cycling and walking network in a way that improves access to nearby services and facilities) to reduce reliance on private car trips. Clearly, this cannot be achieved for the residential development proposed at the Orchard Farm site.

The Net Trip Impact of the consented 8 bungalows (Application Nos. 23/01164/FUL and 24/02120/MMA) was calculated as being very close to the former industrial space of 1158sqm and consequently no highway improvements to the access or visibility splays were required. However, the total allocation proposed for this site is 34 dwellings which will far

exceed the previous trip rates and it is unclear whether a new access with satisfactory visibility splays for such a scale of development can be achieved.

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

Hartley Parish Council seek the deletion of housing allocation ST3 - 3 Orchard Farm, Fawkham Road in order to ensure the Local Plan is consistent with national policy and justified.

Part of the site (Application Nos. 23/01164/FUL and 24/02120/MMA) which is consistent with the NPPF (Para. 149g) has already been developed and requires deletion from the Local Plan.

The Local Plan states that Parish Councils play an important role in identifying local infrastructure needs (Para.9.10) and that development briefs have been prepared for site allocations to articulate clear priorities and an ambitious vision for each site and incorporate the necessary on site infrastructure improvements and set out each site's expected contribution to the wider provision and enhancement of infrastructure required to support sustainable growth (Para.9.9). If the Inspector is minded to retain the housing allocation within the Sevenoaks District Local Plan, Hartley Parish Council would expect:

- A Development Brief following Government guidance and best practice which provided guidance on: layout; scale, massing and height of buildings; landscape; design and infrastructure such that the spatial and visual openness of the Green Belt could be maintained, the landscape qualities of the Lower Fawkham Valley Local Landscape Character Area and the Important Public Views identified in the Fawkham Neighbourhood Plan respected and maintained and the traditional orchard could be retained and enhanced.
- A lower dwelling capacity which accords with the rural location within the Lower Fawkham Valley Local Landscape Character Area
- Reclassification of the site to Fawkham
- Reclassification of the site to Policy ST4 – Greenfield Grey Belt Site Allocations

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 H7 Housing Density and Intensification

Hartley 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 in particular the edge of Hartley and is potentially not consistent with Government policy.

Whilst the densities are expressed as guidelines and subject to the absence of detrimental impacts on local character or amenity, the Policy states that proposals are '*expected to adhere to the guidelines in the first instance*' and 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.

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 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 result 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.

Outside the National Landscape the District comprises attractive and distinctive countryside including within Hartley Parish. The District Council's Landscape Sensitivity Assessment, 2017 and the Parish Councils' Fawkhams and Hartley Local Landscape Character Assessments, 2022 depict the landscape qualities of the area. Policy NE1 Landscape, including National Landscapes states that the landscape character of the District's countryside, outside of the National Landscapes, should be conserved and, where possible, enhanced.

The optimal density in edge of settlement locations should not be so high that they do not enable development 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, Ancient and Veteran Trees, and those protected by TPOs) 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.

The Development Briefs prepared for proposed allocations at the edge of villages and rural locations in particular illustrate the lack of any appropriate assessment of the design and layout of the development or the capacity of the site. Insufficient evidence has been prepared to test whether the densities proposed in Policy H7 can be achieved without adverse consequences on the spatial and visual openness of the Green Belt or the surrounding landscape. Instead it appears that these are the densities necessary for the Local Plan to get close to meeting the identified housing need on the selected allocations. Without such evidence of rigorous testing in this policy-constrained environment, Policy H7 cannot be justified as appropriate.

A net density of 35 dwellings per hectare for development at the edge of the urban confines of higher tier settlements and 20 – 35dph for the edge of villages and rural locations would allow a more successful transition between the built up area and the open countryside.

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 ~~35~~ dwellings per hectare should be achieved; and
- Within and at the edge of villages and rural locations, densities of 30-60 ~~20-35~~ dwellings per hectare should be achieved