

**LEYLAND, KNOCKHOLT ROAD, HALSTEAD, SEVENOAKS, KENT, TN14 7ES**

Sevenoaks District Council  
Planning Department  
Council Offices  
Argyle Road  
Sevenoaks  
Kent TN13 1HG

Your ref: 19/05000/HYB

11<sup>th</sup> November 2019

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING ACT 1990:-**  
**FORT HALSTEAD, CROW DRIVE, HALSTEAD, KENT TN14 7BU**  
**PLANNING APPLICATION REFERENCE NUMBER: 19/05000/HYB**

I refer to your letter of 17<sup>th</sup> October 2019, giving notification of Hybrid planning application 19/05000/HYB at Fort Halstead, Halstead, Sevenoaks, Kent. **I am writing to express my strong opposition to this application for the reasons outlined below.**

In spite of strong local opposition, outline planning permission was granted for this site in 2015 (planning reference 15/00628/OUT), for an “employment-led” mixed-use development of 450 houses, a hotel, and 27,000 square metres of employment floorspace. The size of the approved scheme is already huge, and will impact massively on the surrounding villages and local infrastructure. However, the current applicant is now seeking to increase the size of the development even further, by adding another 300 residential units. The hotel element of the 2015 scheme has been removed and exchanged for more houses, thereby changing the emphasis from an “employment-led” development to a residential one. The revised scheme would therefore consist of 750 new homes, plus substantial commercial, business, retail and community facilities. Proposals of such magnitude would constitute over-development of this site, putting too much pressure on already strained local infrastructure and amenities, harming the sensitive natural environment of the Kent Downs Area of Outstanding Natural Beauty and damaging the site’s irreplaceable Ancient Woodland.

With the 72 *existing* residential properties in Armstrong Close, Beckman Close, Fort Road and Crow Drive, (the Fort’s former staff quarters, now outside the current developer’s ownership), there would actually be a total of 822 residential properties in the wider Fort Halstead settlement, plus all the new commercial, business and community facilities. This would be a huge settlement, and considerably larger than the existing village of Halstead.

I acknowledge that Fort Halstead is a previously developed “brownfield” site, located within the Green Belt, and I accept that it has the potential to be regenerated. However, any re-development should be done sensitively and on a scale that is appropriate to the site and which can be sustained without harming neighbouring communities and the surrounding countryside. I therefore strongly object to increasing the size of the previously approved scheme and to the creation of such a high-density, large-scale new settlement, which would dwarf the neighbouring villages of Halstead and Knockholt. It would destroy the rural character of the Green Belt in this vulnerable part of Kent, have a detrimental impact on the

surrounding Kent Downs Area of Outstanding Natural Beauty, and overwhelm local infrastructure and transport networks. The applicant describes the proposed development as a “village”, no doubt to make it sound more appealing, but it is clear from the scale of the proposals, the increased density and heights of the buildings, and the distinctly urban design – especially in the “Village Centre” - that in reality this is a substantial new **town**, which would be inappropriate and out of scale in such a sensitive, rural setting.

There is much emphasis in the current application on the approval in principle of an additional 300 dwellings at Fort Halstead, on the basis that this addition has already been included in the Submission Version of the new District Local Plan. The applicant appears to assume, therefore, that the Submission Version will be adopted and that consequently the addition of 300 houses will be approved. However, I urge the District Council to seriously reconsider any previously suggested increase, and especially at this juncture when it is not known whether the Submission Version of the Plan will be adopted or not, following the recent suspension of the Government Planning Inspector’s examination. It is vital that the current application for an enlarged scheme at Fort Halstead is not seen in isolation: it must be considered in the wider context of the numerous other proposed and approved developments in Halstead and Badgers Mount, and must take fully into account the cumulative negative impact all these developments will have on the local communities and local infrastructure. Whilst I recognise the pressure the District Council is under from Central Government to build nearly 14,000 new homes in the District between 2015 and 2035, and the challenges this target creates, it is grossly unfair that **such a disproportionate amount of proposed development is to be concentrated in the area of Halstead and Badgers Mount**. Halstead and Badgers Mount has already absorbed its share of the District’s housing needs with the following approved developments:

- The existing outline approval for a major development of **450** houses at Fort Halstead and 27,000m<sup>2</sup> of employment floorspace;
- The recent approval of **29** homes within Halstead village at Warren Court Farm, Knockholt Road;
- Nesbit House retirement/care home at Badgers Mount and new housing on the former **Foxes Garage** site, Badgers Mount, (built);
- **33** new homes at Halstead Place, Church Road, and **3** substantial new houses at Deer Leap Stud Farm, Knockholt Road, (built);
- There is also a new development in the woodland between Badgers Mount and Watercroft Road, Halstead, for the **Bluebell Cemetery** (built),

In addition to the above, the Submission Version of the Local Plan includes the following new development sites for Halstead/Badgers Mount:

- Site 57 - a further **300** new homes at Fort Halstead (included in current application);
- Site 54 - **20** new homes at Highfield Farm, Crow Drive, Halstead;
- Site 43 – **100** new homes at Chelsfield Depot, Shacklands Road, Badgers Mount;
- Site 56 – **37** new homes at Oak Tree Farm, London Road, Halstead;
- Site 44 – **27** new homes on land west of roundabout, Badgers Mount;
- Site 45 – **66** new homes at the Calcutta Club and Polhill Business Centre, London Road, Halstead
- Site 55 – **13** new homes at Deer Leap Stud Farm, Knockholt Road, Halstead.

Whilst not included in the Submission Version of the Plan, the village's Green Belt is also under threat from the proposed **Broke Hill** development, (outline planning application 19/02616/OUT, currently under consideration) with a total of **1030** new homes plus commercial, business, retail and community facilities.

So, by my calculation, and including the enlarged Fort Halstead scheme, we are facing **at least an additional 2000 new homes in Halstead/Badgers Mount which would represent 14% of the whole District's housing target in and around just one small rural village, plus commercial, retail and business development.**

Concentrating such extensive and numerous developments on one small community in this vulnerable part of Kent is unfair, unreasonable and disproportionate, and would transform a small, rural village into one of the largest settlements in the whole of the District, hastening the urbanisation of the area and bringing the urban sprawl of Greater London ever closer. The current planning application for Fort Halstead would play a significant part in this damaging process, and I therefore strongly object to the proposed 300 additional residential units.

### **Increase in traffic:- Impact on local road system and on Environment**

300 additional houses, each likely to have at least two vehicles, would generate a huge increase in traffic, resulting in greater congestion on the local road system, higher traffic pollution and traffic noise. This will contribute to environmental pollution, and poor air quality, which will impact on health and contribute to wider global warming and climate change. The extra traffic from 300 new residential units will be on top of the substantial increase that will already be generated by the approved 2015 scheme – ie by the 450 approved homes, by employees and visitors accessing and exiting the new business and commercial hub, by visitors to the Ancient Monument historic attraction, and by a whole range of delivery and service vehicles, as well as traffic associated with the existing 72 dwellings off Crow Drive. Notwithstanding the creation of a new roundabout at the **primary access at the junction of Crow Drive, Otford Lane and the A224 Polhill Road**, traffic congestion and queues will inevitably occur, especially at peak times, in all directions. Polhill, a steep and winding incline, cuts through the AONB, with the chalk slopes of the Downs above and below. Pollution from queuing traffic, especially ascending Polhill, will have a harmful impact on the biodiversity of the AONB and on Kent Wildlife Trust's Polhill Bank Nature Reserve, located on the slopes immediately below the A224 Polhill Road. Polhill is notoriously hazardous in adverse weather conditions, and I fear any substantial increase in traffic in this area can only exacerbate the situation. The condition of Polhill itself is of particular concern, with its history of instability and future landslide potential. This is acknowledged in the *Ground Conditions* Appendix 13.1 of the current application: "Landslide features are present along the southern and eastern extent of the site boundary at the base of existing chalk formation slopes." Such a substantial increase in traffic on Polhill will increase the risk of landslip, and will precipitate the need for major stabilisation works and resurfacing to make the slopes and highway safe and fit for purpose.

It is also essential that the impact of the primary access at Polhill and the proposed new roundabout is considered in the wider context of the other proposed and existing developments along the A224 between Polhill and the Badgers Mount roundabout. Firstly, and unrelated to the current Fort Halstead scheme, 20 new homes are proposed for Highfield Farm, Crow Drive, bringing yet more traffic to and from Crow Drive. With the proposed new development of 66 houses at Polhill Business Centre/Calcutta Club, there

will be another well-used junction on the A224, located almost immediately off the new Polhill roundabout. Then, with the proposed new development of 37 houses at Oak Tree Farm, there will be yet another busy junction on the other side of the A224, between the new Polhill roundabout and the Badgers Mount roundabout. These new junctions will be in addition to the busy entrance to Polhill Garden Centre on the A224, where access and exit is already hazardous. I fear, therefore, that this stretch of road between Polhill and the Badgers Mount roundabout will become an accident black-spot, with so many additional vehicles trying to turn on to the A224 in busy traffic.

The Badgers Mount roundabout is already busy, especially in peak times, and will inevitably become grid-locked with so much additional traffic associated with the new developments. It will not be able to cope with all the extra traffic going to and from Junction 4 of the M25 via Hewitts roundabout, as well as to and from the A21 for access to Orpington, Bromley, and London, and with additional commuter traffic to and from Knockholt railway station. Increased traffic will not only be generated by the major development at Fort Halstead, and the new developments on the A224 between Polhill and Badgers Mount, referred to above, but also by 100 new homes at the Chelsfield Depot, just off the Badgers Mount roundabout on Shacklands Road, and 27 new homes on land west of the Badgers Mount roundabout. In short, the A224 at Polhill and Badgers Mount, and London Road, Badgers Mount, will become a congestion nightmare, just like the A224 Sevenoaks Way between Orpington and Crittalls Corner, instead of free-flowing, rural main roads. Added to which, a major new development at Broke Hill would be catastrophic.

### **Star Hill secondary access**

A condition of the 2015 approved scheme was that the Star Hill access should be used by buses and emergency vehicles only. However, the current application proposes that it should be used by all vehicles. I object to this change. Star Hill is a distinctly rural route, which would be harmfully “urbanised”, not only by increased traffic, but by the highway safety works that would be required at the mouth of the access road to secure better sight lines, and by cutting back vegetation. Star Hill is notoriously steep and winding, and can be treacherous, particularly in bad weather. These dangers are exacerbated by the regular use of the hill by cycling clubs – the number of cyclists using the hill, especially at weekends, is becoming a problem locally, creating dangerous driving conditions and potential conflict between motorists and cyclists. This difficult situation could only deteriorate further with the creation of a busy junction on the brow of the hill. The developers claim that their design and layout will discourage people from using the Star Hill access, but looking at the Illustrative Masterplan, it is clear that Star Hill will be the primary access for the “Gateway Hamlet”, and also for users of the QinetiQ retained site. It is also directly aligned with the “Dutchmore Wood” residential area, and the “Village Centre” itself. I cannot see, therefore, how people will not use it, and suspect instead that it will be used just as much as the intended primary access at Polhill. The use of the Star Hill access is also likely to result in the villages of Knockholt and Halstead becoming “rat runs”, especially for traffic to and from London, seeking to avoid the inevitable congestion on the A224 Polhill side of the development. I think it would be essential, therefore, to retain the 2015 condition on the restricted use of the Star Hill access.

### **Public transport**

#### **Rail links – Knockholt station**

Most commuters living and working at Fort Halstead will use Knockholt station, a small, rural station which already experiences congestion in the rush-hour, and is served by

overcrowded trains, already running at full capacity. The pressure on existing rush-hour services is exacerbated by large numbers of commuters driving to the station from further afield because it is the last station in Zone 6. I am not aware of any plans to increase the frequency of trains stopping at this station, and therefore question its ability to cope with any substantial increase in use due to the proposed major development at Fort Halstead, as well as all the other proposed developments in Halstead and Badgers Mount. 300 additional houses at Fort Halstead would only exacerbate this problem.

### **Bus service**

Knockholt, Halstead, and Badgers Mount are very poorly served by buses, following the axing of the excellent 402 service between Tunbridge Wells and Bromley. The 431 service between Sevenoaks and Orpington is currently an infrequent service during the week, and does not operate at all at weekends. As far as I am aware, there are currently no public bus services at Fort Halstead, the nearest being the infrequent 431 at the top of Star Hill. At present therefore residents would be completely cut off if they didn't have their own transport. Clearly this situation will have to change, and I note the developers are in discussion with the 431 operator, Go Coach. The reinstatement of the 402 service, which currently only runs between Dunton Green and Tunbridge Wells, would also be a huge improvement.

### **Contamination**

As a long-standing resident of Halstead, whose family have lived in the village for generations, one of my greatest concerns about any re-development, demolition and construction at Fort Halstead is the **risk posed to the general public by contamination**, caused by the storage and use of ammunition and radioactive materials, and by residues from experimental testing at the site for the last hundred years. CBRE's *Planning Statement* for the current application states in 3.19 "*The site has previously been used in a manner similar to general industrial sites. As such, remediation is required to make the site suitable for residential and community uses*". This is a massive understatement – Fort Halstead is an exceptional site, and many of the activities that have been conducted there are in no way similar to "general industrial sites". Hydrock's *Ground Conditions and Contamination* document, and Appendices 13.1 Chapter 9 and 13.2 of the application documents, make very frightening reading indeed. Those of us who have lived in Halstead all our lives, whose families have lived here for generations, and whose friends have lived and worked at the Fort, are well aware of the type of work that has been undertaken at this establishment, and of the contamination that has been caused. Fort Halstead is not just a redundant military base with potential for re-development, but a site that has been the subject of intense and varied testing involving Depleted Uranium, explosive devices, radiation, chemicals, and "Pink Water" over a long period of time, as confirmed by the extensive recent and historic Contamination reports referred to and quoted in the application documents.

To provide just a few examples, the *Ground Conditions & Contamination* document states that **historical uranium use and storage** took place particularly around **buildings Q7, Q6.3, N19 and H19**. According to the *Schedule of Demolition*, an appendix to the *Planning Statement*, buildings Q 6.3 and Q7 are among around 167 existing buildings due to be demolished as part of the re-development scheme. It is horrifying to consider the risks posed to human health during the demolition of such buildings, during the subsequent removal of the contaminated materials from the site, and during excavation works associated with new construction. Given the dangerous nature of their previous use, it is

worrying to think about how these particular building plots will be re-used after demolition, and what the future uses of the retained buildings N19 and H19 will be. The new “Village Centre” appears to be where the Q series of buildings are currently sited. The fact that the area which is to become the very heart of the new development was previously used for the storage of uranium is particularly alarming.

It is also alarming, but not surprising, to see under 13.3 Baseline Conditions of the *Ground Conditions & Contamination* document that Key Receptors “Human Health (Future Users), are listed “Very High” under “Sensitivity” to a number of identified contaminants once the development is operational, and it is particularly worrying to see **“Proposed primary school – High”**. Identified contaminants posing risk once the site is operational include the following: “The Made Ground” in the existing waste compound is a source of lead, copper, PAH, and petroleum hydrocarbons. Asbestos fibres have also been encountered in “Made Ground” at various locations across the site.” 13.3 goes on to list “Depleted Uranium – Historic Activities associated with the Works undertaken to date have identified the potential for elevated radionuclide concentrations. This is primarily anticipated around buildings Q7, Q6.3, N19 and H19”, and “Explosive Residues – Historic activities associated with the Works undertaken to date have indicated the potential for elevated explosive residues. This is primarily anticipated in the R, M and X areas”.

Under Key Receptor **“Human Health (Neighbours and passers-by)”** it is identified that **“During construction there is a risk identified asbestos fibres in Made Ground may have a pathway via wind-blown dispersion to impact upon site neighbours.”** 13.6 identifies this risk again during the Construction phase for affected Receptors “Human health (Construction Workers/Future residents of proposed residential properties” and “In addition, users and visitors to neighbouring off-site properties as well as passers-by”, and “Human Health (users of proposed primary school, passers-by/users of off site areas”. The description of the “Impact” is very frightening: **“During construction the disturbance of Made Ground has the potential to create a pathway for inhalation of asbestos fibres and windblown dust, particularly by groundworkers. In addition, users and visitors to neighbouring off-site properties as well as passers-by may be at risk of exposure. Magnitude is very large due to health risks associated with inhalation of asbestos fibres.”**

Construction workers will quite rightly be required to wear and use appropriate Personal Protective Equipment, but what about the existing residents of properties in Crow Drive, and in Halstead and Knockholt villages, who will be exposed to contaminated dust through inhalation? What about the general public using footpaths surrounding the site? And what about the occupants of the early phases of the development, who will move in before demolition and construction work is completed? **I must therefore ask the question: what protective measures will be provided for neighbouring residents and the general public when contaminated dust is generated during dry and windy conditions, and when contaminated materials are being transported away from the development site?** How will our health be protected when we are out in our gardens, and how will our children’s health and well-being be protected when they are outside playing at the existing village primary schools? I have yet to see any proposed mitigating measures that reassure me, and I question whether any proposed hard capping or cover systems in areas of landscaping, gardens and public open space will reassure future residents, especially in regard to vegetable growing and other gardening activities! Instead, we have to have faith that the authorities who are responsible for our health and well-being will be completely satisfied that mitigating measures will be robust and effective, and that

such measures will be fully investigated and approved *before* any demolition and construction work is commenced, and as a prerequisite of any planning permission.

Sadly, we will probably never know whether such measures were adequate to safe-guard long-term health, and we will never be able to prove links between future health problems and contamination exposure. There are many long-term residents of the villages around Fort Halstead who have already suffered a range of cancers and illnesses over the years. [REDACTED]

[REDACTED] We will never know whether there was any link to the activities at Fort Halstead, but there is a chance that there was. **I therefore ask that the contamination issue is fully and properly addressed, that *all* areas of the proposed development site are fully investigated before building works commence, and that our existing and future communities are robustly protected against any contamination risks.** At the time of the application I note that it had not been possible to carry out detailed ground investigations within the Scheduled Ancient Monument, nor in areas under existing buildings, many of which are scheduled to be demolished. Whilst I appreciate the challenges presented by the archaeological sensitivity of the original Fort, the need for SMC, and close liaison with Historic England, the defensive earthworks around the Fort may be some of the most contaminated areas of the development site, and must therefore be properly investigated. This is essential, given the Ancient Monument's location at the heart of the new development, immediately opposite the "Village Centre", and adjacent to the Primary School, and bearing in mind the intention to make it into a heritage visitor attraction and to use its casemates as craft workshops.

### **QuinetiQ**

Whilst I am pleased to learn that QuinetiQ is to remain on site as a source of employment, I cannot help feeling uneasy about the juxtaposition of their operations to new residential and community activities. I am not aware of the nature of their work and what risks it might pose, but their existing operations are not currently constrained by being co-located with a major mixed-use development, and I do wonder how easily such different activities will sit alongside each other, and what risks each will pose to each other in terms of security (ie the proximity of the General public to QuinetiQ's work), and in terms of future contamination, (ie the proximity of the QuinetiQ enclosure to residential and community areas and to the adjacent heritage attraction.)

### **Helipad**

I am concerned to see that two further land plots that were not proposed for development in the 2015 scheme are now included in the current application, and that one of them is to accommodate a new helipad. Whilst I understand there is an existing helipad site, east of the Canteen further down Crow Drive, I am concerned about any extended helicopter activity at this site. The applicant claims that it will have low impact due to its setting amongst trees, but tree cover will not mitigate the noise caused by low flying, and the disturbance to local residents, who already have to endure a significant increase in noisy executive jets operating from Biggin Hill.

### **Design, Density and Height of proposed new Buildings:**

**Density:** The current application proposes to uplift the approved number of residential units from 450 in the 2015 scheme to 750. The average density of the 2015 outline

approval was 34 dwellings per hectare, but this has increased substantially in the current application to an average of 46 DPH, with the most dense areas R10 and R11 in the “Village Mews” area being as high as 50 – 60 DPH. This is significantly above the previously approved density of 34 DPH in 2015, and above the suggested density in the Submission Version of the Local Plan of 40 DPH for this site. I object to such an increase in density, on the basis that it is over-development of this site, and that such intense development is distinctly urban in nature and is not appropriate for a “village” environment in a rural setting.

**Height:** similarly I am concerned to learn that the current application increases the height of the proposed buildings across the site, with the highest buildings at 3 storeys (15 metres to ridge height) and 4 storeys (16 metres to ridge height) in the “Village Centre”. This is much too high, creating a distinctly urban character to the development, in stark contrast to the “village” feel that the developer claims to want to create. It is also noticeable that the highest and most visually intrusive buildings are in the immediate setting of the Scheduled Ancient Monument, with 4 storey buildings to the north west in the “Village Centre”, and 3 storeys to the north east in the Innovation and Education hub. This would “hem in” the original Fort, its historic casemates and earthworks, blocking views of the monument from the north east and west, and compromising the integrity of its setting. The height of the “Village Centre” and “Innovation and Education hub” buildings should therefore be reduced so that they do not dominate their surroundings and spoil the setting of the historic attraction.

In fact, I am concerned at the increased height of most of the residential areas – only the “Gateway Hamlets” are shown to be up to 2 storeys high, with the “Village Mews” residential units up to 3 storeys, and the “Anisbirches” and “Beaumont Glade” residential units up to 2.5 storeys, with “occasional landmark buildings up to 3 storeys”. This is considerably higher than most residential developments in a village setting, and once again demonstrates that this is an inappropriate urban development, in such a sensitive setting within the Green Belt, within the AONB, and adjacent to Ancient Woodland. I note that there are no single storey homes for older or disabled residents – the only reference I have seen is to “older people’s living accommodation” in an unattractive block of flats in the “Village Centre”. This would appear to be a gross oversight and does not represent a balanced and sustainable development for all ages.

**Design:**

This development presents a wonderful opportunity for good and inspiring design, which at the same time makes reference to, and respects the previous history of the site, and its setting within the Kent Downs AONB. I had therefore looked at the Design Principles documents with interest, hoping to find some vernacular architecture and use of traditional styles and materials typical of Kent Downs villages, such as the use of flint, weather-boarding and tile-hanging. Instead, I was disappointed to find an eclectic mix of suggested designs and styles, inspired from places as diverse as Vilnius in Lithuania and Cornwall, (wooden hut styles), to unattractive red-brick blocks of flats in Nottingham and Cambridge. I was particularly shocked at the artist’s impression of the “Village Centre”, which must surely be a misnomer. The illustrations show large, 4 storey blocks of buildings, which are distinctly urban and heavy in design. Blocks A, B, C and D could not be further from the character of “village” buildings, looking more akin to Orpington or Bromley High Streets than to a “village” setting within the Green Belt and within the Kent Downs AONB! I fully understand the need to integrate the new buildings with the retained historic buildings,



particularly the listed buildings Q13 and Q14, and to make reference to Fort Halstead's historic military and scientific use. However, there is a fine balance between designing buildings that maintain the integrity of the site's previous use whilst at the same time being inspiring and aesthetically pleasing for future users. In my view – and I know that design preference is very much a question of personal taste – the proposed character of the “Village Centre”, with 4 storey, flat-roofed blocks of red-brick buildings, creates a solid mass which is far too heavy, and urban. I appreciate that this design has been inspired by Q14, the Grade II Listed Penney building and adjacent building Q13, but these are not particularly attractive buildings per se. They represent a functional type of building, designed for a purpose and are of their time. Their listed status is more for their historic use and association than for their architectural merits. I agree that it is important for the new buildings not to look out of place with the listed and other retained original buildings, but I am concerned that this specific style should not dominate the entire “Village Centre” and business hub. I am afraid that this heavy style will result in the creation of a new unattractive, red-brick “urban jungle”. I would prefer to see the new buildings lower in height, lighter in feel, and broken up to avoid creating such a heavy and dominating mass of built form. Buildings of less density, mass and height in this sensitive area would also improve the setting of the adjacent Ancient Monument, and create a more genuine “village” feel. I am disappointed that the “Village Green” has been reduced in size since the 2015 scheme, and feel that a larger green space in this key location would be more attractive, and would provide a more open and appropriate setting for the original nineteenth century Fort.

### **Impact on natural environment**

This may be a previously developed site within the Green Belt, but it is still located within the Kent Downs AONB with its rich biodiversity and landscape. It is vitally important, therefore, that any development in such a sensitive setting must respect and preserve its unique natural environment. The addition of 300 houses to the 450 already approved is clearly over-development in this location, and the associated increase in human presence and activity would undoubtedly threaten natural habitats, flora and fauna, and particularly the large areas of Ancient Woodland that are such an important and irreplaceable feature of this site. I was very concerned to see the following statement in Sevenoaks District Council's *Environmental Impact Assessment Scoping Opinion* of 5/4/2019: **“Due to the size of the proposed development, it is likely that the development could result in at least the deterioration of the area of Ancient Woodland.”** It advises the following: “The application should consider the NPPF which states ‘development resulting in the loss or deterioration of irreplaceable habitats (such as Ancient Woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.’ ” I cannot see that any proposed mitigating measures could compensate for the harm such a large development would cause to the Ancient Woodland – indeed, the pressure on space caused by 300 additional house has resulted in a buffer of **only** 15 metres between the Ancient Woodland and the built form. As the *Scoping Opinion* goes on to state, “Natural England have produced Standing Advice on Ancient Woodland and it details the following: ‘For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage.’ ” The key words here are **“at least”**, and sadly the developers in this case have only provided the bare minimum, and hence the Ancient Woodlands will suffer. With fewer houses, there would be much less pressure on space, enabling far more generous buffer zones to protect the Ancient Woodland. Sevenoaks DC has acknowledged that a development of this size is likely to result in the deterioration of the Ancient Woodland, and as the NPPF clearly states that development resulting in the

deterioration of Ancient Woodland should be refused, then it is clear that this application should be refused.

### **Conclusion**

Whilst I agree that it is far preferable to re-develop a previously developed “brownfield” site like Fort Halstead, and **not at any cost** to build on undeveloped and unspoilt Green Belt land like the former golf course at Broke Hill, I still feel that the addition of 300 houses to the 450 already approved is over-development of this site and should be refused.

I agree that Fort Halstead has the potential to be sensitively and tastefully re-developed, and that there are many positive elements of the current proposals, such as the conservation of the site’s historic assets, and the creation of a heritage interpretation centre. I welcome the removal of the B2 large industrial warehouses from the previous scheme, and welcome the provision of a new primary school, thereby alleviating pressure on existing schools and reducing daily journeys into the neighbouring villages. I agree that the on-site community amenities should include a new doctors’ surgery/medical centre, not only for the benefit of new residents but for existing local residents, who currently have to travel some distance for services that are already struggling to meet demand.

However, in spite of some positive elements, the size and scale of the current proposals are far too great, and would put too much pressure on existing local infrastructure, such as the road and transport networks, and on already strained local amenities, such as secondary schools, hospitals and health care provision. I am concerned about the distinctly urban design of the proposed “Village Centre”, and would prefer to see designs and materials more in keeping with the rural character of the Kent Downs villages. I am also opposed to the increase in density and height of buildings across the site. One of my greatest concerns about the re-development of this site is contamination, and the risks posed to existing residents during the demolition and construction phases, and the risks posed to future residents and users due to residual contaminated material remaining on site. Fort Halstead has great potential in theory, but I cannot help wondering whether the nature of the activities that have taken place there for over a hundred years, and the severity and extent of the resulting contamination over the whole site, make it suitable for such a development. The financial cost to deal with the contamination issue will be immense, but if not carried out fully and effectively, the cost to human health could be much greater.

I would be grateful if these comments could be taken into consideration when determining this application.

Yours faithfully

A S Hayward

MRS A HAYWARD