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*Thursday, 23 July 2020*

**Planning Policy**  
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*Ref: 19/05000, Amended Application—proposed development of 635 houses at Fort Halstead.*

*Dear Sir/Madam,*

I'm writing to you on behalf of the Knockholt Society to set out its objections to the amendment involving the proposed development of 635 homes at Fort Halstead. Just as an aside, it's worth pointing out that according to a report in *The Times* newspaper (09 July 2020), Kent had the greatest increase in built-up area of *any* county in the country between 1990 and 2015...

For the Society, as well as the residents of Knockholt and surrounding villages who have objected to, and will be severely impacted by, this needless development on Green Belt land, this amendment is a continuation of a farce that's been ongoing for many years involving various developers.

It's worth a recap:

- **2011**—Fort Halstead was addressed by Sevenoaks District Council (SDC) in its Core Strategy. An SDC news release in January 2011 stated: “As part of its development, the Core Strategy was examined at a public inquiry last October, held by the Planning Inspectorate. Planning agents acting on behalf of the owners of Fort Halstead tabled a proposal to re-allocate the site for a residential development of up to 1,000 homes with local facilities.

“Sevenoaks District Council did not support this proposal and it was opposed by the Kent Downs AONB Unit at the inquiry. The Planning Inspector rejected the proposal. The Inspector said the site was **not in a sustainable location** [*my bold text, but what's changed?*] as its inhabitants would have to travel a considerable distance to access transport, shopping, and other facilities and that the development was not needed to meet the District's future development requirements.”

SDC concluded: “In practice, this means that large-scale housing development at the site is unlikely to be granted planning permission,”

- **2014–2015**—Just three years later, SDC reneged on that decision with a new wheeze: ‘*Employment-led*’. SDC's updated Core Strategy now viewed Fort Halstead as “*a Major Employment Site in the Green Belt and a Major Development Site.*” Well, at least you admitted it was Green Belt land...



This ‘Redevelopment of Fort Halstead’, as it was called, was adopted by SDC in 2015, which supported the about turn with the following demands (or, given later developments, should I say ‘excuses?’):

- “Redevelopment proposals will be expected to **achieve a range of employment uses** ... and generate at least the number of jobs that the site accommodated immediately prior to the announced withdrawal of DSTL from the site.
- “Residential development of **up to 450 units** **may** also be permitted, provided it forms part of a mixed use scheme that delivers an **employment-led development**. The inclusion of **appropriate community facilities and infrastructure** to support the sustainable development of the site consistent with the policy **will be required.**” [*my bold text in all cases*]

And SDC duly included the proposal (15/00628) in its local development plan—despite huge opposition—and subsequently granted planning permission for it in December 2015.

Let’s remind ourselves of what was promised by the applicant:

- 450 one to five-bedroom houses, of which 15% to 20% would be affordable housing;
- a 3.6 hectare business park providing 1,026 jobs + 10.2 hectares for QinetiQ’s ongoing operations providing approximately 250 jobs;
- another 131 jobs at the 0.6 hectare village centre;
- an 80-bedroom four-star hotel on 1.6 hectares, providing 76 jobs;
- a village centre and green with a small shop and community space, which could include a crèche and surgery;
- a military heritage museum and retention of the existing Fort scheduled monument.
- **Grand total—1,483 jobs**

**2015–2020**—During the past five years the true nature of this application—as predicted by the Society and many, many other commentators and objectors—has come to pass. What has happened to all those ‘employment-led’ promises? To those predicted 1,483 jobs? To that four-star hotel?

Well, firstly we had another application—*can we please build another 300 houses [making a total of 750] since all that employment-led stuff has turned out not to be viable [ie: oh dear, we won’t make the £many millions we expected]*.

As this point, SDC should have thrown out the entire scheme and rescinded the 2015 permission on the basis that **none** of the points I’ve highlighted in bold could be met.

**Why didn’t you?**

**Why don’t you do that now?**

So what do we have now?

A ‘drop’ from 750 to 635 houses—**ie: an INCREASE** of 185 houses/over 40% on the 2015 ‘employment-led’ permission—with a few minor amendments such as a reduction in some building heights and some housing density. On the latter, it’s worth reminding you that the average density locally is 15 to 18 dwellings per hectare (DPH): this application’s density is **25 to 50 DPH**...

We are talking about the development of a sprawling housing estate far bigger than Knockholt; potentially home to around 2,500 people, and probably 1,500+ cars! And where are the ‘**appropriate community facilities and infrastructure**’ you demanded in 2015?

In cloud cuckoo land perhaps?

The Society and residents are particularly concerned with road safety, especially as the existing outlet to Star Hill Road is integral to this new amendment. I remind you that ‘Condition 14’ of the 2015 permission required that: *‘before the development could proceed, we require details to show how the Star Hill access would be restricted and maintained for use only by buses, emergency vehicles, cyclists, pedestrians and horses’*.

Your current excuse is that this is all a problem for Kent County Council. But as we all know, Star Hill Road:

- is badly maintained; has no footpaths; is narrow; has a series of completely blind bends; is much favoured by cycling clubs because of its hilly challenge; has been the scene of numerous accidents;
- is totally inadequate to cope with the potential 1,500+ new cars, as well as heavy goods vehicles/delivery vans likely to service the 635 homes;

- and if this access is allowed, it will turn Knockholt and surrounding villages into rat runs with all the dangers inherent.

The Star Hill Road exit is described as ‘secondary’ in this amendment, but no measures are in place to define that. Throughout Fort Halstead’s operational history, even during peak employment years, this exit has *always* been restricted. It would be extremely dangerous to allow free flowing traffic to use this exit onto a derestricted road. Visibility is limited and traffic from the north is on the brow of a blind hill. Any proposed speed limits on Star Hill Road are unlikely to slow approaching traffic and will have no effect on the condition of this road, as described above.

As for the traffic estimates that supported the 2015 application:

- At Knockholt Parish Council’s (KPC) planning committee at the time a councillor accurately described them as an insult to the intelligence of everyone living in the area;
- Like the KPC, the Society had, and has, absolutely no faith in the figures provided by that traffic survey, whose findings were and are an insult to residents who know this area extremely well;
- The increase in traffic then predicted for the 450-home development at peak times of 26 vehicles was absurd. Today, with the increase in traffic, it’s risible;
- As highlighted in D. Barton’s report in 2015, this was (and is) a development remote from essential services—car ownership will be essential.

Can I remind you of what the Society said in its letter dated 15 August 2015 (*your ref. SE/15/00628/OUT*): ‘SDC states that the development must be employment-led. If that does not happen, then as we’ve made clear before, there is a very real danger that the developer will seek to replace business/industrial buildings with more profitable housing’.

COVID-19 has shown all of us just how important Green Belt land, the environment, and the ability to access open spaces is for this, and future, generations.

Can I also remind you of what SDC leader Peter Fleming said (*In Shape* issue 114, Spring 2020, page 22) about the Local Plan: “*While we consider our options, one thing is certain; we will continue to stand up for our residents and our environment.*”

Have the guts to support that statement.

Rescind the 2015 ‘Employment-led’ planning permission on the grounds that it bears *no reality whatsoever* to what is being applied for today, which is an out-and-out crammed together housing estate answering **NONE** of the demands SDC called for in granting permission in 2015.

The Society looks forward to seeing Peter Fleming’s words turned into reality.

*Yours sincerely, on behalf of the Knockholt Society*

