

FORT HALSTEAD

Merseyside Pension Fund

Planning Statement

September 2019

CONTENTS

1.0 Introduction	2
2.0 Site Context and Planning History	5
3.0 Proposals.....	11
4.0 Pre-application advice and public consultation	20
5.0 Planning Policy	27
6.0 Planning Policy Assessment	30
7.0 Summary and Conclusions.....	68

APPENDICES

- A. EIA Scoping Opinion from SDC
- B. Indicative Summary Floorspace Schedule
- C. Schedule of Demolition
- D. Green Belt Assessment

1.0 Introduction

- 1.1 This Planning Statement has been prepared by CBRE Ltd on behalf of Merseyside Pension Fund ('the Applicant' hereafter) to accompany the submission of a hybrid planning application for the site known as Fort Halstead, Crow Drive, Sevenoaks, TN14 7BP ('the site' hereafter).
- 1.2 The Applicant purchased the site in February 2017 from Armstrong (Kent) LLP ('AKLLP'). The Government's Defence, Science and Technology Laboratory ('Dstl') is the current main occupier of the site, alongside QinetiQ, a defence technology company.
- 1.3 Fort Halstead comprises an existing employment site, currently occupied by Dstl and QinetiQ. Their operations sit principally within a secure fence, although a canteen, visitor reception area and car parking sit outside of this. The current function of the site is as a Research and Development (R&D) facility and includes the storing and use of high-grade explosive material amongst other military research activities. The site is located within the Green Belt and the Kent Downs Area of Outstanding Natural Beauty.
- 1.4 In 2011, Dstl announced its intention to relocate all of its operations from Fort Halstead to Porton Down and Portsdown West. As a result of Dstl's announcement, AKLLP as the previous owners of the site appointed a multi-disciplinary team to plan positively for the future of Fort Halstead and an outline planning application (OPA) was subsequently submitted to Sevenoaks District Council ('SDC') in February 2015 for the mixed-use redevelopment of the site to comprise 450 residential units, up to 27,000 sqm employment floorspace, a hotel, a village centre and a historic interpretation centre.
- 1.5 Planning permission was subsequently granted by SDC in December 2015 under application reference SE/15/00628/OUT. The OPA was aligned to SDC's adopted planning policy framework for the site, which allocated the site for employment-led, mixed use development in order to secure the delivery of new homes and jobs following Dstl's departure.
- 1.6 Since planning permission was granted, the process of Dstl leaving the site has been ongoing, and they are now due to fully vacate by early 2022. The Applicant, as the new site owners, took the decision to review the planning position with regards to the masterplanning of the site, in parallel with SDC's emerging Local Plan process. In light of the emerging Local Plan the Applicant has engaged in the Local Plan process, and the Submission Local Plan identifies the site for removal from the Green Belt allocated for a mixed-use development, including employment land and up to 750 new homes. The new Plan will be adopted following the Examination in Public, which commences in September 2019.
- 1.7 The emerging allocation and the submission of this hybrid planning application follows an extensive period of discussion with Officers at SDC, statutory and non-statutory consultees, residents and other local stakeholders. The proposals have therefore been shaped, informed and developed through pre-application discussions and public consultation events, which have been carried out alongside the submission Local Plan.
- 1.8 The hybrid planning application seeks approval for the following description of development:
Hybrid planning permission comprising:
In detail:
 - Demolition of existing buildings;
 - Change of use and works to buildings Q13 and Q14 (including landscaping and public realm);
 - Primary and secondary accesses.

1.0 Introduction

In outline:

- *Development of business space (use classes B1a/b/c) of up to 27,659 sq m GEA;*
- *Works within the 'X' enclave relating to energetic testing operations, including fencing, access, car parking;*
- *Development of up to 750 residential dwellings;*
- *Development of a mixed-use village centre (use classes A1/A3/A4/A5/B1a/D1/D2);*
- *Development of a one form entry primary school;*
- *Change of use of Fort Area and bunkers to Historic Interpretation Centre (use class D1) with workshop space;*
- *Roads, pedestrian and cycle routes, public transport infrastructure, car parking, utilities infrastructure, drainage;*
- *Landscaping, landforming and ecological mitigation works.*

1.9 This Planning Statement includes an assessment of the relevant planning policies and material considerations against which the proposals should be considered. It is structured in the following manner:

- Section 2.0 provides a description of the site and a summary of the relevant planning history;
- Section 3.0 describes the proposals in detail;
- Section 4.0 provides an overview of the pre-application engagement undertaken with various key stakeholders;
- Section 5.0 outlines the planning policy context, including the adopted and submission Development Plan;
- Section 6.0 assesses the proposals against relevant planning policies and other material planning considerations;
- Section 7.0 concludes and reflects on the proposals put forward.

Scope of Submission

1.10 This Planning Statement should be read in conjunction with the other documents which form part of this application and comprise:

For Approval

- Application form and ownership certificates;
- Site Location Plan;
- Existing Site Plan;
- Parameter Plans:
 - Land Use and Green Infrastructure
 - Building Heights
 - Access and Movement

1.0 Introduction

- Demolition Plan
- Detailed Plans for the Full Application component:
 - Village Centre Proposed Demolition Plan
 - Village Centre Proposals in Context Plan
 - Existing Floor Plans, Roof Plan, Elevations
 - Proposed Primary Demolition
 - Proposed Floor Plans, Roof Plan, Elevations and Sections
 - Proposed Bin and Cycle Store
 - Proposed Primary and Secondary Accesses

Supporting Documents

- Illustrative Masterplan;
- Indicative Density Plan;
- Indicative Phasing Plan;
- Design and Access Statement;
- Design Principles Document;
- Environmental Statement Volume I: Non-Technical Summary;
- Environmental Statement Volume II: Main Volume;
- Environmental Statement Volume III: Technical Appendices
- Viability Statement;
- Employment Opportunities Report;
- AONB Report;
- Detailed: Schedule of Accommodation
- Statement of Community Involvement;
- Energy and Sustainability Statements.

2.0 Site Context and Planning History

THE SITE

- 2.1 The site is located on Crow Drive, approximately 8km north-east of Sevenoaks on the edge of the North Downs, and approximately 1km to the west of the M25 motorway running north to south. It is within the administrative area of Sevenoaks District Council (SDC). Additionally, the site falls within five parishes: Knockholt, Halstead, Dunton Green, Chevening and Badgers Mount.
- 2.2 The site currently comprises a secured employment site, occupied by Dstl and QinetiQ, which sits within a secure fence. The functions of the site include R&D facilities, the storing and use of high -grade explosive material and other military research activities. However large areas of the site are no longer in active use as they have been decommissioned by Dstl due to their impending move from the site.
- 2.3 The development of the existing site has taken place over a significant period. The Fort itself (which is a Scheduled Monument) was a mobilisation centre, originally constructed from c.1895 as one of a ring of fortresses around London. Since then, the built form of the site has come forward in phases of development, linked to the operational requirements of the site, with the main building phase connected to the Cold War. Since the Atomic weapons research and development function was transferred elsewhere, Fort Halstead has continued as a government defence research establishment.
- 2.4 Fort Halstead possesses a unique character, resulting from its location and use as a military research site. The location of the site, at the edge of the escarpment, was the result of a strategic requirement for viewpoints to the south in the defence of London. The site's built character has evolved across a number of phases, responding to the operational requirements of the occupier.
- 2.5 Fort Halstead now consists primarily of office buildings, workshops and laboratories built throughout the twentieth century. There were previously around 350 buildings on site; however, in recent years this number has declined due to an ongoing process of demolitions by Dstl, as they incrementally move their operations away from Fort Halstead. Currently, there is an estimated 276 buildings on site.
- 2.6 Outside of the secure fence sits the site reception building, an area of visitor car parking and a staff canteen which is no longer in active use. Crow Drive is within the Applicant's ownership, as is the helipad area which is further down Crow Drive, to the east of the canteen.
- 2.7 The area within MPF's ownership is c.132 hectares, of which in the region of 60ha is previously developed land ('PDL') as defined by the National Planning Policy Framework ('NPPF'). The hybrid planning application site boundary is 75.20 ha.
- 2.8 The whole site is located within the Kent Downs Area of Outstanding Natural Beauty and the Green Belt and includes large areas of woodland (including c.45 ha of designated Ancient Woodland) and open space.
- 2.9 The site contains a Scheduled Monument, which includes three listed buildings (one of which is Grade II and the other two are Grade II*), and a separate Grade II listed building (Q14) which lies outside the Fort. This building is the subject of a listed building consent application submitted in tandem with this hybrid planning application. The site is not located within a Conservation Area.
- 2.10 The entirety of the application site boundary is covered by a Tree Protection Order ('TPO').
- 2.11 The site is located within Flood Zone 1, which means it is located within an area that has a 1 in 1000 chance of flooding.

2.0 Site Context and Planning History

Access

- 2.12 There are currently two gated vehicular accesses to the secure part of the site, a main access from Crow Drive (off from the A224 at Polhill) to the east, and a secondary access with limited opening times onto Star Hill to the west.
- 2.13 Due to the site's secure nature, it is not directly accessible by public transport. However, Dstl currently provides a free bus for employees travelling to the nearest rail stations (Knockholt Station and Orpington Station).
- 2.14 The site is connected to a network of Public Rights of Way ('PROW'), including the North Downs Way, which all run outside of the fence line. There is also a cycle lane running along Crow Drive to the main site entrance gate.

Surrounding Area

- 2.15 Adjacent to the main Crow Drive entrance are 72 residential dwellings, none of which are within the Applicant's ownership. Further to the east of these properties, along Crow Drive, is a builder's yard.
- 2.16 Other than the development along Crow Drive, the immediate surroundings are agricultural with woodlands and fields to the north, south, east and west, along with some isolated residential properties.
- 2.17 The site is located at the top of Star Hill, on a steep escarpment which drops significantly to the south. To the south-east of the site, within a quarry pit, lies the North Downs Business Park, which comprises industrial storage units and an operational gravel pit.
- 2.18 The wider surrounding area comprises a network of villages. There are some standalone commercial developments in close proximity to the site, specifically Polhill Garden Centre, 7 Hotel & Diner and the London Road Furniture Company, which are all situated at London Road/Polhill.

HISTORIC DEVELOPMENT OF FORT HALSTEAD

- 2.19 The development of the existing site has taken place over an extensive period of time, beginning with the Fort itself between 1895-7, as a mobilisation centre as part of the London Defence Scheme. Following this, during World War 1 (WW1) within the Fort, an ammunition laboratory (Building F14) was constructed and later further buildings were constructed adjacent. In 1938, the Site was occupied by the Projectile Development Establishment and approximately 80 buildings comprising specialist explosives filling sheds, laboratories, workshops, administration buildings and facilities were constructed, together with air raid shelters and infrastructure (roads and drainage).
- 2.20 During World War II, developments in explosive and armament technology were undertaken at the Site, requiring the construction of laboratories, workshops and ancillary structures to the north of the Fort in the 'Q' Area and within the Fort itself (including bomb chamber Building F16 and detonation laboratory Building F17). Following the departure of the High Explosive Research to another Site, 'conventional' research continued. This resulted in the expansion (infilling) of the built form on the Site, including firing ranges and supporting structures in the 'R' Area of the Site and later the magazines in the 'M' Area, until the 1980s comprising approximately 350 buildings at the peak of the operations on the Site.
- 2.21 The full historic development of the site is set out in the Built Heritage Statement prepared by CgMs, which is provided at Volume III 8.1 of the Environmental Statement accompanying this application.

2.0 Site Context and Planning History

PLANNING HISTORY

The Site

2015 Outline Planning Permission

- 2.22 AKLLP as the previous owners of the site obtained outline planning permission (OPP) (ref: SE/15/00628/OUT) on the 30th December 2015 for the following description of development:

'Outline planning permission for the demolition of buildings and development of a mixed-use development comprising a business area (Use Classes B1 and B2 with ancillary energetic material testing) of up to 27,000 sq m GEA, 450 residential units, a hotel of up to 80 beds, a village centre (Use Classes A1-A3, B1a, D1 and D2), use of the Fort Area and bunkers as an historic interpretation centre (Use Class D1), and works associated with the development including roads, landscaping, security fencing, formal and informal open space, pedestrian, cyclist and public transport infrastructure, utilities infrastructure, sustainable urban drainage system, cycle and car parking (with all matters reserved); and detailed approval for two access points at Otford Lane/Crow Drive (primary) and Star Hill (secondary).'

- 2.23 The OPP had all matters reserved, save for details of the means of access to the site from Polhill, and from Star Hill Road. The Star Hill access was restricted to use by buses, emergency vehicles, cyclists, pedestrians and horses.
- 2.24 The OPP was brought forward in accordance with the site-specific policy contained within SDC's Allocation and Development Management Policies (AMDP) Policy EMP3 for an employment-led scheme which included 450 residential units.
- 2.25 The application was also the subject of a Section 106 Agreement, including the requirement to provide 20% affordable housing provision.
- 2.26 This OPP has now been formally implemented through the undertaking of a material operation as set out under Section 56 (4) of the Town and Country Planning Act 1990 and a Certificate of Lawful Existing Use/Development ('CLEUD') issued by SDC on 13th December 2018 (ref: 18/02662/LDCEX) confirms this.

2004 CLEUD

- 2.27 A CLEUD (ref: 03/02897/LDCEX) was granted in respect of the existing uses on site in 2004, including B1 (research and development, offices, light industry) with ancillary uses including B8 (storage/distribution), a canteen, energetic material testing and a social club totalling 82,168 sq m (GEA) of built footprint.

Demolitions

- 2.28 In October 2014 Dstl submitted a Prior Approval Notice for the demolition of Building A25 (ref: 14/03289/DEMNOT). A planning application was not required.
- 2.29 In December 2014 Dstl submitted a Prior Approval Notice for the demolitions of Buildings H18, H19, H28, H33.1, H43, H45, H45.1, H47, H47.1, H47.2, H49, H52, H53, Q27, X43, X44, X45 & X75 (ref: 14/03899/DEMNOT). Planning approval was not required, but two conditions were added to the notice.

Other Planning Applications

2.0 Site Context and Planning History

- 2.30 In February 2010 a planning application (ref: 09/03020/FUL) was granted for a 36 sqm extension to Building A19 (conference hall) alongside a change of use to a restaurant and catering hall.
- 2.31 In June 2003 a planning application (ref: 03/01063/CIR18) was granted for the conversion of an existing workshop to a warehouse facility with a 20m high top hat section for the purpose of storage, together with the re-cladding of the whole structure.
- 2.32 Given the site is covered by a TPO, a number of applications have been submitted by Dstl in relation to tree related works on the site.

EIA Scoping

- 2.33 In April 2019, SDC issued a Scoping Opinion for an Environmental Impact Assessment for the redevelopment of Fort Halstead for the provision of employment land and up to 750 residential dwellings. This concluded that due to the scale of the development an Environmental Statement is required.
- 2.34 A copy of the Scoping Opinion can be found in Appendix A of this Planning Statement.

Surrounding Area

Officers Mess

- 2.35 A full planning application (ref: 14/01363/FUL) for conversion of the former Officers Mess (sui generis use) to provide 10 two-bedroom flats with associated parking was granted by SDC on 1st August 2014. The Officers Mess comprises redundant former Officers Quarters, located at 4 Armstrong Close, adjacent to the Fort Halstead visitor reception and car parking area.
- 2.36 Another application (ref: SE/16/01254/FUL) was subsequently submitted on the same site for demolition of the existing buildings and the erection of 14 new residential units. This was refused by SDC on the 21st September 2016. It was subsequently dismissed at appeal (ref: APP/G2245/W/3162846) on the 2nd March 2017.

Armstrong Close & Fort Halstead Residential Property

- 2.37 Two Certificate of Lawfulness applications (refs: 14/02330/LDCEX and SE/14/02329/LDCEX) were granted by SDC in 2014 in respect of the existing residential properties for lawful use as Class C3 dwellings.

LOCAL PLAN PROMOTION

- 2.38 As part of SDC's ADMP document, which forms part of the adopted Development Plan, the site is currently allocated under Policy EMP3 ('Redevelopment of Fort Halstead') as a major Employment Site in the Green Belt, suitable for appropriate employment-led mixed use redevelopment. The policy specifies that the employment uses should generate at least the same number of jobs on site at the time Dstl announced their departure. Additionally, up to 450 residential units, a hotel and community facilities could be included in the redevelopment. As set out above, the OPA was brought forward in accordance with Policy EMP3.
- 2.39 Following the sale of the site to the Applicant in early 2017, the decision was taken to engage proactively with SDC's emerging Local Plan process given Fort Halstead is a significant site

2.0 Site Context and Planning History

within the District. Furthermore, the first Local Plan Issues and Options Consultation (Reg.18) in Autumn 2017 included supplementary text which stated that:

“Fort Halstead has an existing permission for employment-led, mixed-use redevelopment including 450 new homes. The site is largely brownfield land and may have the potential to accommodate a greater level of employment and/or housing, which would help protect other less developed areas of the Green Belt from potential release.”

- 2.40 As SDC had identified the site may be able to accommodate a greater level of development, representations were subsequently submitted on behalf of the Applicant in October 2017 which expressed support for the above statement and acknowledged that Fort Halstead has an important role in contributing towards meeting the District’s employment and housing needs through the delivery of a new residential community.
- 2.41 Subsequently, the Applicant has positively engaged with all stages of the emerging Local Plan process, including a Call for Sites submission in May 2018 for up to 750 new homes (an uplift of 300 in comparison to the OPP). This Call for Sites submission was based on a detailed feasibility exercise, which as a result of site layout optimisation and increased densities, identified there was scope for c.750 residential units to be delivered across the site, alongside maintaining the employment focus and a mixed-use village centre.
- 2.42 As part of the evidence base for the emerging Local Plan, a Green Belt Assessment was undertaken by ARUP in January 2017. The site is within Parcel 76, which is a 739.1ha parcel which encompasses Halstead and borders Greater London and Badger’s Mount. Fort Halstead is identified as sub-area RA-22 within Parcel 76. The assessment considers that:
- “[it] may score weakly against the NPPF purposes if considered alone. It constitutes an extensive area of existing encroachment and possesses a semi-urban character (Purpose 3). It is generally inward facing, separated from the wider countryside by extensive, dense planted buffers, thus limiting its role in preventing coalescence between settlements (Purpose 2). Furthermore, its distance from the edge of Greater London and its status as a standalone built-up area means that it would not constitute ‘sprawl’ (Purpose 1).”*
- 2.43 A number of sites have been identified for Green Belt release in order to help meet SDC’s housing need. Fort Halstead is one of such sites, identified as previously developed land and being assessed weakly against Green Belt purposes (as above), it is clearly positively viewed in policy terms for an allocation for development.
- 2.44 Fort Halstead is also identified as a site within SDC’s Supply of Deliverable Housing Sites which will contribute to SDC’s housing land supply from year 6 onwards. Whilst SDC can demonstrate a 5-year housing land supply, the Objectively Assessed Housing Need (OAHN) is 13,690 homes over the Plan period using the standard methodology. The submission Local Plan has a current identified supply of 10,568 homes, with the understanding being that SDC can meet its annual target of 698 homes for the first 12 years of the Plan but will subsequently fall short from years 13+. SDC have clearly identified that Fort Halstead offers a sustainable phased development site which will continue to deliver housing from early on in the Plan period.
- 2.45 Therefore, it is clear that the site should be viewed as a sustainable and logical Green Belt release, in order to help meet SDC’s challenging housing need, particularly in the later stages of the Plan. SDC, as part of the emerging Local Plan process, have therefore proposed the site for release from the Green Belt and have allocated it for up to 750 new homes.

2.0 Site Context and Planning History

- 2.46 For reference, SDC’s Exceptional Circumstances case for amending green belt boundaries is based upon consideration of the following points as set out in the Proposed Submission version of the draft Plan:
- The nature and extent of harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed);
 - The inherent constraints on supply/availability of land prima facie suitable for sustainable development
 - The acuteness/intensity of the objectively assessed need (matters of degree may be important);
 - The consequent difficulties in achieving sustainable development without impinging on the Green Belt;
 - The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent;
 - The extent to which land meets the purposes of inclusion in the Green Belt, namely the five key tests set out in paragraph 134 of the NPPF;
 - Whether the release of land will result in the delivery of infrastructure to meet an existing evidence based need;
 - The overall sustainability of the proposals, as assessed by the Sustainability Appraisal of the Local Plan.

3.0 Proposals

- 3.1 Section 3.0 of the Planning Statement summarises the key elements of the proposed development.
- 3.2 This planning application seeks approval for the following description of development:

Hybrid planning permission comprising:

In detail:

- *Demolition of existing buildings;*
- *Change of use and works to buildings Q13 and Q14 (including landscaping and public realm);*
- *Primary and secondary accesses.*

In outline:

- *Development of business space (use classes B1a/b/c) of up to 27,659 sq m GEA;*
 - *Works within the 'X' enclave relating to energetic testing operations, including fencing, access, car parking;*
 - *Development of up to 750 residential dwellings;*
 - *Development of a mixed-use village centre (use classes A1/A3/A4/A5/B1a/D1/D2);*
 - *Development of a one form entry primary school;*
 - *Change of use of Fort Area and bunkers to Historic Interpretation Centre (use class D1) with workshop space;*
 - *Roads, pedestrian and cycle routes, public transport infrastructure, car parking, utilities infrastructure, drainage;*
 - *Landscaping, landforming and ecological mitigation works.*
- 3.3 An indicative summary floorspace schedule by land use, including both the without school and with school scenarios, is included in Appendix B of this Statement.

FORMAT OF HYBRID APPLICATION

- 3.4 The planning application for the site is submitted as a 'hybrid' planning application ('HPA'), meaning that part will be submitted in detail (the Detailed Component), with the remainder in outline (the Outline Component).
- 3.5 In accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015, the HPA seeks approval at this stage for the outline component:
- **Use** – the use or uses proposed for the development and any distinct development zones within the site identified;
 - **Amount** – the maximum amount of development proposed for each use;
 - **Distribution of uses** – the approximate location of buildings, routes and open spaces included in the development proposed;
 - **Scale** – an indication of the upper and lower limit for the height, width and length of each building included in the development proposed;
 - **Access** – means of access to the site.

3.0 Proposals

- 3.6 It is intended that the 'detail' for Outline Component will be dealt with through the submission of Reserved Matters pursuant to the outline planning permission for each phase or sub-phase of the development. There may be a series of submissions for each phase or sub-phase of development, as set out within the indicative Phasing Strategy submitted with the application as part of the Environmental Statement, which has been prepared to describe how the site would be indicatively delivered through the planning process.
- 3.7 For clarity, the matters which are reserved for future consideration, and thus do not form part of the HPA, are:
- **Layout** – the way in which buildings, routes and open spaces are provided within the development and their relationship to buildings and spaces outside the development;
 - **Scale** – the exact height, width and length of each building proposed in relation to its surroundings;
 - **Appearance** – the aspects of a building or place which determine the visual impression it makes, excluding the external built form of the development;
 - **Landscaping** – the treatment of private and public spaces to enhance or protect the site's amenity through hard and soft measures, for example, through planting of trees or hedges or screening by fences or walls.
- 3.8 The extent of the development which is proposed to be fixed as part of the Outline Component is defined within the Parameter Plans submitted as part of this application.
- 3.9 A Design Principles Document is contained within the Design & Access Statement, and provides detailed 'mandatory' design principles for approval. These include:
- Character Areas in relation to the outline part of the planning application;
 - Access and Movement in relation to the outline part of the planning application;
 - Crow Drive Character Area in relation to the outline part of the planning application;
 - Village Centre Design Guidance in relation to both the detailed and the outline part of the planning application.
- 3.10 The Detailed Component comprises the refurbishment, conversion and extension of two existing buildings on the site, Q13 and Q14. Q14 ('Penney Building') is Grade II listed, and therefore an application for listed building consent is also submitted in tandem with this HPA.

THE VISION

- 3.11 The proposals will deliver the following vision for the site:
- Secure a viable, sustainable and vibrant long-term future for Fort Halstead that recognises its unique qualities and heritage;
 - Regenerate a major employment site providing a range of employment opportunities and create a new village community which complements the existing network of surrounding settlements;
 - Provide a range of high-quality new homes which respond to the District's needs;
 - Ensure development is sensitive to its rural setting and will not have an adverse impact on the natural beauty, character and tranquillity of the Kent Downs AONB;

3.0 Proposals

- Achieve a balance of uses that will create a high-quality 'place' with its own identity, providing new homes, jobs, community facilities and open space to be enjoyed by the wider community.
- 3.12 The above vision for the site has been informed by the emerging allocation design guidance contained within the draft Local Plan, as well as the consultation process undertaken with key stakeholders and the local community.

Demolition

- 3.13 The majority of the buildings and infrastructure on the site is custom built for the specific operational requirements of the previous and current occupiers (Dstl and QinetiQ). Some are now unusable, inefficient and in a poor state of repair. The majority of buildings on the Site are generally not considered suitable or fit for commercial reuse, as they would not meet the requirements of potential future occupants. However, there are a number of listed buildings, buildings within the Scheduled Monument, and buildings in close proximity to the Fort of non-designated heritage value, which are to be retained and have helped to shape key Character Areas of the illustrative masterplan.
- 3.14 QinetiQ, who are to be retained on site, have a number of operational requirements which they wish to continue within purpose built bespoke buildings which already exist on the Site (within the 'X' series). As such, a significant number of buildings in the existing 'X' Area will be retained and secured to form the QinetiQ enclave.
- 3.15 A list of buildings proposed to be demolished is contained in Appendix C of this Planning Statement.

Retained Buildings

- 3.16 A number of buildings are to be retained and refurbished to allow their continued use within Fort Halstead. These include the Scheduled Monument and surrounding listed buildings (F2-F9, F11, F16 & F17) which will be used for D1 museum/community use, as well as A13 and A14 ('the cottages'), which will be used for B1 uses. The refurbishment of the listed Penney Building (Q14) forms an integral part of the Village Centre and will be complemented by the retention of Q13 adjacent. Within the employment areas, a number of existing buildings are already fit for purpose, or suitable for refurbishment, and will be retained and refurbished, including, A1, A3, A10 and A11. The QinetiQ enclave comprises existing specialist buildings which will be retained as part of the proposals.
- 3.17 A number of magazine buildings (within the 'M' series) are located along Crow Drive towards the Star Hill access. The buildings, designed and used for storage of explosive materials, were constructed in the 1980-1990s, with three main typologies, including brick-built administrative buildings, reinforced concrete sunken magazine structures, and brick and steel storage buildings which are above ground, with frangible roofs. These magazines do not have specific architectural, historic or functional reasons for selective retention, however, the proposals seek to retain six bunkers, which front Crow Drive, as reference to the past use of the site. The remaining structures will be demolished or back-filled.

Infrastructure and Decontamination

- 3.18 The infrastructure currently at site is thought to date from the 1960s/70s and is generally not suitable for re-use. An early phase of the development will therefore involve the upgrade or installation of the necessary utilities infrastructure including water, electricity and telecommunications.

3.0 Proposals

- 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 described in detail in Ground Condition and Outline Remediation Method Statement, contained within Volume III 13.1 and 13.2 of the Environmental Statement.

Land Uses

Employment

QinetiQ Enclave

- 3.20 QinetiQ have a requirement to remain on site following Dstl’s departure, and this forms one of the key drivers for the application, that they be retained in suitable facilities and integrated and embedded into the village fabric.
- 3.21 Currently, QinetiQ primarily operate from within the ‘X’ Area, however they are also integrated within Dstl’s operations elsewhere on the site. As part of Dstl’s departure, they are currently in the process of moving all of their operations within the ‘X’ enclave, and are consulting with HSE regarding their permissible blast zone and licensing arrangements. The majority of existing buildings within the ‘X’ enclave will be retained for use by QinetiQ, with any potential future demolitions shown on the Demolition Parameter Plan.
- 3.22 QinetiQ will require a secure demise to continue their operations. As such, their enclave will be secured by a fence. This fence is already in place to the south, but will need to encompass the full X enclave. The fence details are outlined within the DAS in the Crow Drive Character Area.
- 3.23 QinetiQ currently employ c.150 people on site, and this figure is likely to be broadly maintained, with some growth potential over the development period.

Business Innovation and Education Hubs

- 3.24 Employment provision is a fundamental component of this planning application. Detailed consideration has been given to the future form and function of the employment space and associated facilities and infrastructure necessary to ensure it delivers a high quality business hub at Fort Halstead. The masterplan has evolved such that the proposals include the provision of two key employment zones:
- Village Centre Business Hub – B1a/b space predominantly fronting onto QinetiQ, complemented by a flexible/co-working space integrated into the village centre combined with community facilities including café, shop, nursery, gym, community/healthcare space.
 - Eastern Innovation and Education Hub – across the former ‘A’ area – delivery of high quality B1a/b/c and ancillary B8 space (compatible with the site sensitivities, noting the exclusion of B2 and significant quantum of B8), and specifically including retained buildings A1, A3, A10, A11 to be delivered early in the scheme phasing. This includes land for a potential Primary School. Land within this area is to be provided for the delivery of a 1FE primary school, to be delivered once KCC Education assess there to be a requirement.

Residential

- 3.25 The proposals will involve the creation of a new village community within a unique location in the District. A community of up to 750 homes is proposed, including a balance of housing sizes and types to reflect a mixed and balanced community.

3.0 Proposals

- 3.26 The uplift in unit numbers to 750 (from the extant consented permission of 450) is considered to represent a sustainable solution for the site, and will help to foster the creation of a viable new community, which is appropriate in scale for the location and in the interest of responding to SDC's housing need and creating a mixed and balanced community.
- 3.27 The indicative residential mix proposes a range of unit sizes (1-5 bedrooms), in a range of styles and sizes (apartments to detached housing). The mix of typologies and unit sizes will ensure the residential development reflects the unique character of the site, and in design terms is essential for creating the distinct Character Areas for the site, which are defined in more detail within the Design Principles Document, which is part of the Design and Access Statement.
- 3.28 The development proposes 25% affordable housing, to split between shared ownership and affordable rent at 65%/35% respectively. The affordable housing will be delivered in phases as per the market housing and will be secured through the Section 106 Agreement. Further to this, MPF is working with SDC's housing officers to explore the securing of a Community Lettings Agreement, which will seek to ensure that priority to local people is given for the affordable housing units as far as possible.

Heritage

The Penney Building – Q14

- 3.29 The Penney Building, Q14, is a Grade II Listed Building. Q14 was designed in 1949 and built as part of the phase of development to serve the Atomic Bomb, High Explosives Research (HER) work lead by William Penny, Chief Super Intendent Armaments Research (CSAR) at Fort Halstead.
- 3.30 Q14 is located within the Fort Halstead complex, with its immediate setting is formed by the Q enclave. Crow Drive runs to the south of this enclave separating the area from the Fort. Q14 is of considerable, national historic interest through its association with the HER, and holds historic interest as the only building nationally where the prototype atomic bomb was put together.
- 3.31 As part of the current application, it is proposed to convert, alter and extend the building to form part of the new village centre which would sit at the heart of the new settlement. The building, currently unused and in a state of severe disrepair, will be brought back into beneficial use, as part of a community and business space delivering significant heritage benefits to the development. The refurbishment, conversion and extension of Q14 and linkage to Q13 through a new atrium will deliver the reinstatement of a number of key features of the building previously lost.
- 3.32 Q14 will be set in a new public square and will become the focal point of the development in combination with the Fort and other retained non designated heritage assets.
- 3.33 Building Q14 will also be subject of a Listed Building Application which has been submitted in tandem with this Hybrid application.

Historic Interpretation Centre

- 3.34 The Fort, as a Scheduled Monument, represents the establishment of the site as a military resource, with military research activities ongoing throughout the twentieth century to the present day. It is therefore a key historical asset in terms of representing the history of military activity on the site.

3.0 Proposals

- 3.35 The proposals will ensure the long-term maintenance of the Fort and its setting. The Heritage Management Plan sets out the framework for creating an Historic Interpretation Centre to celebrate the site's historic past and uses, and the Fort's role in the development of Fort Halstead. The Scheduled Monument with a cluster of magazines (within the M area) will be refurbished as part of the Centre (Use Class D1) and form a visitor attraction. Casements within the Fort have the potential for use as ancillary craft workshops, as part of supporting the Fort's continuing use and the wider rural economy. The change of use of the Scheduled Monument and the magazines is sought as part of this application, however, details of the works to the structures and their setting will form part of the relevant reserved matters and future Scheduled Monument/Listed Building consents where necessary. Buildings F2-F9 are within the Scheduled Monument. Additionally, Buildings F11, F16 and F17 are Listed.

Access and movement

- 3.36 The proposals seek detailed consent for accesses. The internal road layout will be included within Reserved Matters applications, however the Access and Movement Parameter Plan shows the main internal spine road, main roads around the residential plots, employment plots and QinetiQ's area. Additionally, indicative internal footpaths and cycle routes are shown, with linkages to the existing PROW.
- 3.37 The main access to the site is currently off Polhill. This will remain the main vehicular access to the site, and a roundabout will be installed at the junction of Crow Drive and Polhill.
- 3.38 The proposals include the existing Star Hill access as a secondary access to the site. KCC Highways have an absolute requirement for a development of this scale to be served by two access points and therefore Star Hill must remain open. However, the proposals have been carefully configured, in coordination with KCC, to ensure that the Polhill access operates as the main access point, serving the majority of the development. This has been achieved through the internal road network, and reducing internal speeds to 20 mph, and this also ensures that Fort Halstead will not be used a through route or 'rat run', as there will be no time saving benefit for vehicles if passing through the site instead of the strategic road network. The Design and Access Statement identifies Crow Drive/Crow Road as it's own Character Area and sets out detailed design requirements in terms of its function, speed reduction interventions and alignment.

Connectivity

- 3.39 To improve the sustainability of the development, significant improvements are proposed to public transport, walking and cycling links. A Framework Travel Plan has been submitted as part of this application and will be secured through the Section 106 Agreement.

Public Transport

- 3.40 Positive discussions have been held with KCC and Go Coach, the operator of the 431 bus service (Orpington High Street to Sevenoaks). The proposals include the rerouting of the service so that it serves the Fort Halstead site.
- 3.41 In addition, as previously provided as part of the 2015 permission, to complement and extend the bus provision to site, a dedicated new high quality, community bus service will be provided to operate from the site. This will provide a bespoke service tailored to meet the needs of both the residential community and the business community.

Walking and Cycling

3.0 Proposals

- 3.42 Due to security restrictions, the majority of the site is not currently publicly accessible, and a number of Public Rights of Way (PROW) are severed or diverted. It is therefore proposed to reconnect the site to a number of walking and cycling routes in the area, such as the PROW which extends across the northern part of the site towards Knockholt Pound.
- 3.43 Improvements are also proposed to the cycle network in and around the site. The masterplan prioritises the movement of pedestrians and cycles through the site, providing a network of green links and walking and cycling routes. In addition, the proposals include the design of streets within the site to accord with a 20mph zone; provision of new off-road cycle route through the site between the Polhill access to Knockholt Pound; new on-road cycle lanes between Polhill and Shanklands Roundabout as well as cycle facility upgrades at the site junction and enhancements to provide safer access to Knockholt station; proposed 40mph limit on Star Hill and provision of lighting of the M25 underpass /bridleway linking Polhill and Filston Way.

Landscaping, Open Space and Playscape

- 3.44 Fort Halstead is a unique site located within the Kent Downs AONB. Consideration of the development and its landscape has underpinned the evolution of the development proposals and landscape and green infrastructure strategy. The proposals are accompanied by an AONB Report and by technical assessments outlined earlier in this Statement. The proposals are designed to enhance biodiversity and the natural heritage features, ensuring sensitive management of the woodland, mature trees and areas of chalk, semi-improved and neutral grassland. A Landscape and Ecological Management Plan (LEMP) and a Framework Ecological Mitigation Strategy (FEMS) form part of the application.
- 3.45 The proposals include for a landscaping strategy which encompasses the whole site, and provides for new and enhanced landscaping through the site, through the formation of green corridors and a sequence of new open spaces which complement and enhance the setting of the designated heritage assets.
- 3.46 Leisure routes and play space will be provided through out the development as appropriate including a combination of LAPS, LEAPS, a MUGA, an informal kick about area and a network of walking, jogging and cycling routes.

Environmental Impact Assessment

- 3.47 The procedures for carrying out EIA for a proposed development within the terrestrial environment are set out within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The proposed development is not Schedule 1 development, for which EIA would be mandatory; however, it is of a type listed within the descriptions of development contained within Schedule 2, falling under category 10(b) *urban development projects*.
- 3.48 A development is considered to be Schedule 2 development if any part of it lies within a 'sensitive area' or if it meets or exceeds the relevant thresholds and criteria for that category of development, as detailed in the EIA Regulations 2017. For category 10(b) projects, these are as follows:
- i. The development includes more than 1 hectare of urban development which is not dwelling-house development; or
 - ii. The development includes more than 150 dwellings; or
 - iii. The overall area of the development exceeds 5 hectares.

3.0 Proposals

- 3.49 The proposed development does lie within a sensitive area, the Kent Downs AONB, as defined in the EIA Regulations 2017. In addition, the development would exceed all the category 10(b) thresholds as it comprises: more than 1 hectare of ‘non-dwelling-house’ urban development; more than 150 dwellings; and, an overall site area greater than 5 hectares. As such, the proposals are considered Schedule 2 development and would fall within the scope of the EIA Regulations.
- 3.50 Schedule 2 developments are only ‘EIA development’ where they have the potential to give rise to likely significant effects on the environment by factors such as their nature, size and location. In the interest of undertaking a robust assessment of the likely environmental effects (positive and negative), the Applicant committed to undertaking an EIA and submitting an Environmental Statement (ES) to SDC alongside the proposed hybrid planning application.

Scoping Opinion

- 3.51 An EIA Scoping request was made accordingly under Regulation 15, paragraph 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in October 2018, and formally consulted upon by SDC, with their Scoping Opinion received in April 2019. The Scoping Request is appended to the Environmental Statement, setting out the proposed approach to the EIA and technical assessment work.
- 3.52 SDC agreed that the proposal was to be considered within Schedule 2 of the 2017 EIA Regulations. SDC collated statutory consultee responses to the EIA Scoping Request and set out the required scope for the EIA, which has been carried forward through to the assessments undertaken and reported through the Environmental Statement.

KEY BENEFITS

- 3.53 The key benefits of the proposals are summarised as follows:
- A new employment vision for the future of Fort Halstead delivering employment opportunities and contributing to local economic growth. Providing a range of high quality employment opportunities across B1a/b/c Use Classes through the creation of a business, education and innovation hub.
 - Retention of QinetiQ as a key employer in a new secure R&D enclave.
 - Delivering employment floorspace early in the development, c.4,000 sqm GEA business floorspace will be available for occupation before the build out of any residential plots, as well as serviced employment plots ready for development, reinforcing the development as an employment led scheme;
 - Regeneration of a major previously developed site including the fundamental and comprehensive upgrade of site infrastructure to make the site fit for development, supporting its future as a modern employment and residential village, including significant upgrades to the energy and water networks;
 - Delivering a significant contribution towards SDC’s housing land supply including delivery of much needed affordable housing to contribute to meeting SDC’s identified local affordable housing need;
 - Improved biodiversity, landscaping and amenity space – the proposals provide a comprehensive ecological management and landscaping scheme and recreational network, making a positive contribution to the achievement of aims and objectives of

3.0 Proposals

the Kent Downs AONB Management Plan and conserve and enhance the natural beauty and tranquillity of the Kent Downs Area of Outstanding Natural Beauty;

- Celebrating the Site’s heritage through the retention and preservation of the Fort and Listed Buildings, and creation of a Historic Interpretation Centre. Providing new viable uses for both designated and non-designated assets retained and knitting them into the heart of the new village;
- Creation of a new, balanced and sustainable community, integrating the existing residential community along Crow Drive;
- Delivery of a high quality, sustainable design established through Character Area Design Principles;
- Providing enhanced opportunities for travel by sustainable transport through provision of a Community Bus, upgrades to the existing 431 bus service, and facilitating upgrades to local public rights of way through a S106 Agreement; and
- Provision of land and the planning framework (established through this planning permission) for a one form-entry primary school, to be delivered by KCC.

4.0 Pre-application advice and public consultation

- 4.1 Section 4.0 of the Planning Statement sets out the consultation work undertaken prior to submission of the planning application in respect of the proposals and how this has shaped the proposed development.
- 4.2 The applicant has undertaken various pre-application discussions over the last two years with representatives from SDC (officers and Members), and KCC officers, as well as undertaking Public Consultation events on site. An independent Design Review Panel (led by Design South East) was also undertaken. Full details of this engagement is set out within the Statement of Community Involvement ('SCI') submitted as part of this planning application.

POLICY CONTEXT

- 4.3 The National Planning Policy Framework (NPPF) and SDC's Statement of Community Involvement (adopted 2014) outlines the process for engaging with the local community as part of the planning application process. Consultation is to be conducted in an effective way to ensure views are representative across a community, which is reflected in paragraph 128 of the NPPF:

“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”

- 4.4 Furthermore, paragraph 39 recognises that good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.
- 4.5 The pre-application engagement undertaken also accords with the latest guidance contained within the Department for Communities and Local Government Planning Practice Guidance which states:

“Pre-application engagement by prospective applicants offers significant potential to improve both the efficiency and effectiveness of the planning application system and improve the quality of planning applications and their likelihood of success.”¹

CONSULTATION WITH SDC

- 4.6 Throughout the development of the proposals, the applicant has sought to engage with SDC through a Planning Performance Agreement establishing a pre-application engagement framework. This has been important to ensure that the final proposals positively respond to the District's requirements and can be supported.
- 4.7 A series of pre-application meetings have been held over the past two years:
 - **October 2017:** Initial discussions undertaken with senior Officers to introduce Merseyside Pension Fund as the new owners of the site. Discussion was focused around the initial site capacity feasibility work undertaken following their acquisition of the site. Officers also identified that the preparation of the new Local Plan was progressing and that Fort

¹ Paragraph: 001 Reference ID: 20-001-20190315, Revision date: 15 03 2019

4.0 Pre-application advice and public consultation

Halstead was being considered and questioned if the site might be capable of accommodating greater development capacity. Both parties agreed that a constructive working relationship moving forward should be fostered to ensure that SDC have a proactive role in helping to shape any emerging proposals for the site.

- **August 2018:** Following further detailed feasibility design work, the project team met with SDC Officers to present the emerging masterplan and key development principles, which included:
 - Increased height and density across the site;
 - Varied and denser housing typology, with inclusion of helipad and bunker locations as additional residential parcels;
 - Removal of hotel from the proposals;
 - Amended employment mix (Class B2 and Class B8 no longer considered appropriate);
 - Improved village centre offering, with a reduction in size of the village green.
 - Retention of Q13 and Q14 within the village centre.

At this meeting Officers did not raise an in-principle objection to the elements of the emerging masterplan presented.

- **October 2018:** The purpose of this meeting primarily focussed on the proposals for the Village Centre and the sensitive refurbishment of Q14 ('The Penney Building'). The key aspirations articulated for the Village Centre were to:
 - Improve and evolve from the previous OPP illustrative masterplan;
 - Improve the mixed-use and community function as the centre ('heart') of the development;
 - Improve the setting of the Fort;
 - Sensitively restore Q13 and Q14;
 - Create a new mixed-use building, with retail and commercial facilities on the ground floor;
 - Create new linkages, such as a new north to south route, connecting the Fort to the Village Centre and the northern residential parcels of the site;
 - Create new views and enhance existing views.

In terms of the proposals for Q13 and Q14, which would be at the core of the Village Centre, Officers confirmed support for the principle of establishing a modern atrium intervention between both buildings.

In terms of linkages, Officers were supportive of the creation of a distinct north/south route, however queried the positioning of a new mixed-use building in this regard, and considered that it might impact negatively on views through the north to south route.

- **November 2018:** Two pre-application meetings were held in November, which covered the emerging masterplan design principles, the approach to the uplift in unit numbers, and heritage considerations following a site visit with Officers. It was confirmed at this meeting that the emerging masterplan could accommodate in the region of 750 residential units and that as part of representations to the emerging Local Plan, a draft allocation for the same quantum will be sought.

4.0 Pre-application advice and public consultation

In relation to securing the design principles for the site, it was confirmed that the application would be submitted with a Design Principles document. This, in combination with the parameter plans and the Design and Access Statement (DAS) will help to secure the design quality of the scheme at Reserved Matters stage. Officers recognised that appropriate Character Area articulation also demonstrates how the site is capable of accommodating an increase in densities. Officers advised that the Character Area Design Principles should be suitably detailed, with mandatory principles incorporated so elements can be secured at outline application stage.

- **December 2018:** The EIA Scoping consultation period was underway, and initial consultee comments were discussed. SDC confirmed that the draft Local Plan received Cabinet Approval to take to full Council for public consultation. The masterplan was presented to SDC officers for feedback and discussion, and it was agreed that character area work should be progressed to understand better the 'look and feel' and materiality, as well as detailed comments on parts of specific character area work. There was detailed discussion on the Village Centre design and retained building strategy, as well as the relationship with the development and landscaping/public realm. Detailed discussion on employment zone, referring to precedents at Alconbury Weald type and nature of employment space and retained building strategy.
- **January 2019:** Further discussion on final points responding to EIA Scoping comments regarding approach to archaeology. SDC officers were also provided with a summary from the public consultation events which took place this month. The Applicant provided an update on QinetiQ and its requirements for both temporary occupational needs (including various temporary uses and development, including fencing) as well as longer term considerations for securing within the X enclave. The Character Area Studies were also presented to demonstrate the structure and scope of the proposed design principles. SDC requested that information on frontage treatment and street sections be provided, as well as a glossary/definition of terms. Draft planning condition structure was also provided to be assessed and fed back at a later meeting.
- **February 2019 (early):** SDC provided an update on the Local Plan consultation which closed earlier in February in terms of the emerging timescales for submission of the Plan pending Council Committee approval. There was an update on the QinetiQ fence temporary requirement. Following the Design Review Panel, which took place in January, written response had been received, the responses and proposed design response and scheme changes to which was discussed, in particular the village centre and location of the village green and its interrelationship with Q14 and the Fort. A statement of approach regarding archaeology was discussed, in relation to the EIA Scoping.
- **February 2019 (late):** detailed discussion on the Design Principles approach and Character Areas document which had been presented at the previous pre-application meeting. There was further design development of the village centre following the design review panel, as well as linking in to discussion on the retention of existing buildings and their proposed uses. SDC confirmed that they wanted to see a Character Area for Crow Drive.
- **March 2019:** KCC Highways officers also attended the meeting, to discuss the approach to Crow Drive – where a number of design interventions were discussed, and the approach to Star Hill. The structure of the planning application drawings was agreed and the approach to addressing the Design Review Panel comments. Future

4.0 Pre-application advice and public consultation

pre-application workstreams were discussed, including viability, education and S106 drafting.

- **April 2019:** there was discussion following the meeting that had been held with KCC Education regarding the need for a one form entry primary school at the site. Post-meeting, KCC Education had provided specification and draft proposals had been shared, as well as with KCC Highways. A safety audit had been undertaken and shared with KCC Highways.
- **May 2019:** QinetiQ were represented at the meeting alongside the applicant, and the scope and timings of the temporary planning applications were discussed, as well as their commitment to the site and hybrid planning application process confirmed. A draft of the prepared 'fly through' of the village centre was viewed by SDC and initial comments provided, along with further comments on the Masterplan, parameter plans and Character Areas. The parameter plans scope was discussed and some changes in terms of the key, and terminology were agreed. SDC provided an update following the Local Elections.
- **July 2019:** application submission timescales and format were discussed, with SDC outlining their requirements for registering the application. The draft description of development was also discussed. The S106 Heads of Terms were discussed and it was agreed that this, and the further viability meetings, would be required to be scheduled once the application had been submitted.
- **August 2019:** a site visit with SDC officers was undertaken having received special clearance to access more restricted parts of the site. This included the following areas:
 - F Area (The Fort Scheduled Monument);
 - X Area (QinetiQ Enclave);
 - M Bunker Area (more modern area to the south of Crow Drive);
 - A, H, N, Q, R and S areas.
 - Inside buildings Q13 and N10
- **August 2019:** a meeting was held to include SDC's Housing Officer, as well as policy officers in relation to the application submission timescales and programme, the form of the application, the status of the emerging Examination in Public into the Local Plan and to receive some specific comments on housing provision including type and tenure of affordable housing, and various mechanisms to be included within the S106 regarding local need.

CONSULTATION WITH KENT COUNTY COUNCIL

Education

- 4.8 Further to KCC Education's representations to the SDC Local Plan Regulation 19 consultation (whereby they initially raised the need for a 1 Form Entry Primary School in the Halstead area), it was considered expedient to engage further with regard to the provision of a primary school generated by the proposed development.
- 4.9 A meeting was held with Ian Watts, Area Education Officer (North Kent) and SDC officers in April 2019. It was agreed that in principle, a primary school could be accommodated on the site, and there were various mechanisms to monitor and transfer the land at such a point in time that it was required by KCC, through the Section 106 Agreement. KCC

4.0 Pre-application advice and public consultation

provided design parameters for a 1FE Primary School, which were developed into an illustrative layout by JTP and shared with KCC for agreement in principle that the plot of land identified could accommodate a school, playing fields and car drop off. A Safety Review of the proposed drop off was undertaken in order to refine the proposed indicative design.

- 4.10 It is anticipated that further engagement will be undertaken regarding the detailed wording of Section 106 clauses.

Highways

- 4.11 The scope of the Transport Assessment, and the parameters used have been subject to detailed pre-application discussions with KCC. A joint pre-application meeting with SDC and KCC's highways officer was held in January 2019 to discuss the principles of the TA, surveys and evidence work, and approach to design. A site visit was undertaken in February 2019 with Highways Officers to understand the current layout and condition of the site's highways network, consider internal traffic calming design features, and view the site's accesses.
- 4.12 A further joint pre-application meeting was held in March 2019 to discuss Crow Drive and Star Hill, following technical assessment work of the proposed development impact on the access junction. A detailed note was provided by PBA, setting out proposed traffic calming measures and proposing a reduction in speed limits on Star Hill.
- 4.13 Following this meeting, a Safety Review of the proposed scheme was undertaken and in places, the road layout and design amended accordingly.
- 4.14 At the subsequent pre-app meeting in April 2019, there was further discussion regarding the school and bus routes/services and layout. There was also detailed discussion regarding the highways layout within the site, including entrance features, Crow Drive alignment, crossing points and parking in the village centre.
- 4.15 In May, working drawings of Crow Drive were shared with KCC, which presented KCC's required design amendments, and was broadly agreed subject to further points be secured through detailed design.
- 4.16 In June, tracking diagrams and further designs were shared with KCC, as well as the draft Character Area guidance which has been produced for Crow Drive. This clearly sets out the design requirements for Crow Drive when the relevant reserved matters applications come forward pursuant to the HPA, to secure the necessary traffic calming design features required.
- 4.17 Alongside the technical pre-application discussions, PBA has also engaged with the local bus operator, Go-Coach, who run the 431 bus route which runs from Orpington to Sevenoaks via Halstead and Knockholt Pound, with a view to securing bus diversion through the site once the development is operational. This has been confirmed as possible by Go Coach. Alongside this, the KCC Public Transport team has also been engaged to discuss the community bus provision for the site.

Public Rights of Way (PROW)

- 4.18 Through the EIA Scoping Exercise, KCC PROW Officer commented that improvements to the PROW secured through the proposals would be welcomed. It was also noted that a new LVIA should be undertaken, which has been the case.

4.0 Pre-application advice and public consultation

Archaeology

- 4.19 Through the EIA scoping exercise, a number of comments on archaeological assessment process were made. In order to address these, and provide comfort regarding the robustness of the approach to archaeology, a meeting was held with the KCC Archaeology officer and SDC officers. It was agreed that the archaeology and historic landscape elements of significance would be covered in a Cultural Heritage Section of the ES and assessed through the EIA.

Ecology

- 4.20 KCC Ecology responded to the EIA Scoping Request to confirm that they are satisfied with the range of ecological surveys carried out and proposed to be carried out through the EIA process. The need for a 15m Ancient Woodland buffer was noted, which has been agreed and taken forward by the design team.

Lead Local Flood Authority

- 4.21 Pre-application engagement has also been held with the Lead Local Flood Authority (LLFA) to agree the strategy for the site. This was undertaken via email, and it was confirmed that the principle drainage strategy of deep boreholes would be acceptable subject to detailed design requirements which will be undertaken following planning permission.

CONSULTATION WITH STATUTORY CONSULTEES

Kent Downs AONB Board

- 4.22 A meeting was held with the Planning Manager of the Kent Downs AONB Unit in November 2018, to introduce the proposals and principles guiding the site development, as well as presenting visuals and landscape viewpoint work.
- 4.23 Further to this, a site visit was held in January 2019 to walk the site and understand the existing scale of development and the landscape sensitive areas. An updated illustrative masterplan was also shared in draft.

Historic England

- 4.24 A meeting was held in December 2018 to outline the approach to the HPA, detailed elements and Listed Building Consent Application for Q14. The design for the village centre, with its clear relation to the setting of the designated Heritage Assets was also discussed, as well as the retention of non-designated buildings across the site.
- 4.25 Further to this, feedback was received setting out viewpoint assessment that HE wished to see, which was provided in the form of photographs and illustrative drawings.
- 4.26 Following design change to the village centre, HE were further engaged and confirmed in May 2019 by email, that they did not object to the proposed intervention to Q14 and Q13, support for the retention of building A10 and advice on the future need for Scheduled Monument Consent in relation to the heritage benefits for tree clearance at the Fort.
- 4.27 There was further correspondence on the proposed Historic Interpretation Centre and it was anticipated that this would be covered by further detailed discussions regarding the Section 106 Agreement.

4.0 Pre-application advice and public consultation

DESIGN REVIEW PANEL

- 4.28 SDC officers requested that a Design Review Panel, to be hosted by Design South East, be undertaken during the design evolution of the proposals.
- 4.29 A pack of documents and images was issued to the appointed panel in advance of the meeting, to provide background on the site and proposals.
- 4.30 The panel were led on a site tour by members of the project team with SDC officers, and able to access the general areas of the site (no buildings were internally inspected) in order to provide a sense of the scale and characteristics of the site.
- 4.31 Thereafter, a meeting was held on site to review the proposals. The Design and Access Statement presents the letter from the panel and sets out how the project team sought to address the comments.
- 4.32 The accompanying Design and Access Statement to the planning application sets out the evolution of the design from the initial concept to the final proposed submission scheme. There were a number of key changes that have been proposed by the applicant in response to officer, statutory and non-statutory consultees and Design Review Panel comments.

PUBLIC CONSULTATION

- 4.33 Since 2017, the applicant has engaged with SDC Councillors, surrounding Parish Councils, neighbouring residents and the general public. A Statement of Community Involvement has been prepared and accompanies this application.
- 4.34 Meetings were held with the immediate site neighbours (residents of the housing off Crow Drive) ahead of the main public consultation event in January 2019. These households were contacted with the offer of a meeting with the applicant and project team.
- 4.35 Public consultation was then undertaken in January 2019, and attended by c.200 members of the public.
- 4.36 Feedback was received from 64 households, as well as verbal feedback at the events, which is summarised in the Statement of Community Involvement (SCI) which is submitted alongside this planning application.
- 4.37 The topic areas raised through the consultation period, and the Application response to these are set out in the SCI and as such are not repeated here. Throughout the planning application determination period, CBRE (on behalf of Merseyside Pension Fund) will continue to engage with key stakeholders and local residents.

5.0 Planning Policy

- 5.1 The Town and Country Planning Act 1990 (the “1990 Act”) and the Planning and Compulsory Purchase Act 2004 (the “2004 Act”) establish the legislative basis for town planning in England and Wales. Together these acts establish a “plan led” system which requires planning authorities to determine planning applications in accordance with the statutory development plan (the development plan) unless material considerations indicate otherwise (section 38(6) of the 2004 Act).
- 5.2 Accordingly, this section of the Planning Statement sets out the relevant planning policy framework and material considerations against which the application proposals have been developed and should be determined against.

DEVELOPMENT PLAN

- 5.3 SDC’s Development Plan currently comprises:
- Core Strategy (‘CS’) - 2011
 - Allocations and Development Management Plan (‘ADMP’) - 2015

MATERIAL CONSIDERATIONS

National Planning Policy Framework (NPPF)

- 5.4 The NPPF was adopted as strategic guidance in July 2018, superseding the previous Framework adopted in 2012. It has since been subject to minor amendments during 2019.
- 5.5 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, and a presumption in favour of sustainable development is at the heart of the Framework. Where the Development Plan is absent, silent or the relevant policies are out of date, the NPPF states that Local Planning Authorities should grant planning permission, unless (inter alia) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as taken as a whole.

SDC Submission Local Plan

- 5.6 The replacement Local Plan is at an advanced stage of production, having been submitted for Independent Examination in Public on the 30th April 2019, and Examination in Public scheduled for September – November 2019. Given the advanced stage of the document and the existing Local Plan being considered out of date on many strategic issues, it is considered that significant weight should be given to the submission Local Plan. The site benefits from an emerging allocation for a mixed use development incorporating business uses and up to 750 residential units.
- 5.7 Notwithstanding the above, at the time of application submission the submission Local Plan is not yet adopted, and therefore this Planning Statement assesses the proposals against the current Development Plan, as well as the emerging policy.

Other Material Considerations

- 5.8 In addition to the above, other material considerations to the planning application include a number of supporting planning guidance documents. Relevant to this application are:
- National Planning Practice Guidance;
 - Evidence Base documents which support SDC’s adopted and emerging planning policies;

5.0 Planning Policy

- Supplementary Planning Guidance Notes (SPGs) and Supplementary Planning Documents (SPDs).

SDC Green Belt Assessment (2017)

- 5.9 This document is intended to provide an assessment of the different areas of Green Belt in SDC against the purposes of the Green Belt as part of the evidence base for the emerging Local Plan. This document has been referred to when considering the proposals and when the site was put forward for release and development through the Local Plan.

SDC Topic Papers (2019)

- 5.10 In support of the Local Plan, SDC has produced ‘Topic Papers’ setting out the key evidence supporting their spatial strategy. These comprise the following:
- Development Strategy Topic Paper
 - Housing Topic Paper
 - Delivery Topic Paper
 - Employment and Retail Topic Paper
 - Gypsy and Traveller Topic Paper
 - Transport and Infrastructure Topic Paper

POLICY DESIGNATIONS

Statutory and Policy Designations

- 5.11 The site is subject to the following specific designations:
- Located within the Green Belt;
 - Located within the Kent Downs Area of Outstanding Natural Beauty;
 - Contains a Scheduled Monument (‘SM’);
 - Contains two Grade II* listed buildings and one Grade II listed building within the SM;
 - Contains a further Grade II listed building (‘Penney Building’);
 - Part of the woodland perimeter of the site comprises ancient woodland.
- 5.12 There are also relevant designations in the immediate surroundings:
- Sevenoaks Gravel Pit SSSI (c.2km South East of the Site); and
 - Woodlands West of Shoreham SNCI (c.0.5km North East of the Site).

Adopted Policy Designations

- Allocated for redevelopment pursuant to Policy EMP3 ‘Redevelopment of Fort Halstead’ in the ADMP;
 - Identified as a Major Development Site (‘MDS’) in the Green Belt in the CS.
- 5.13 Policy EMP3 of the ADMP specifically allocates the site as a Major Employment Site in the Green Belt, suitable for employment-led, mixed use redevelopment. The policy specifies that the employment uses will generate at least the number of jobs on site at the time Dstl

5.0 Planning Policy

announced their departure, additionally, up to 450 residential units, a hotel and community facilities could be included in the redevelopment.

Emerging Policies

- 5.14 Under the submission Local Plan, the site is allocated site no.57 ('Fort Halstead') under Policy ST2 ('Housing and Mixed Use Site Allocations') for an additional 300 units above the 450 already consented under application ref: SE/15/00628/OUT.
- 5.15 Within Appendix 2 'Housing and Mixed Use Allocations Maps and Development Guidance' further land use and design guidance is provided, which is summarised below:
- In terms of land use, the site is suitable for mixed-use, including residential, leisure, employment, retail, infrastructure and open space;
 - A developable area of 62.66ha and a density of 40 DPH;
 - The additional housing units must form part of a comprehensive redevelopment of the site to include replacement employment floorspace;
 - Any additional development must conserve and enhance the AONB;
 - Any additional development will be required to be of high quality design and careful layout, providing a buffer to protect the ancient woodland and priority habitats;
 - Landscaping and planting should be integrated into the development and will be required to provide a buffer and defensible boundary to help the development blend into its surroundings;
 - Respect and respond sensitively to existing positive and unique features within the site. This includes the protection and enhancement of the SAM;
 - Improve the provision and connectivity of green infrastructure including improvements to the Public Right of Way Network;
 - Multiple access points will be required;
 - If one element of the site is available for redevelopment in advance of the other, the development should be designed in such a way so as not to preclude the future integration of development, or the operation of the existing functions.

6.0 Planning Policy Assessment

- 6.1 This section of the Planning Statement provides an assessment of the proposals in relation to the planning policies and guidance, and material considerations set out in the preceding sections.
- 6.2 The key planning considerations arising from pre-application discussions and the public consultation are:
 - Principle of Redevelopment:
 - Principle of Development in the Green Belt;
 - Principle of Development in the AONB;
 - Principle of Employment development;
 - Principle of Residential development;
 - Impact on designated Heritage Assets;
 - Development Management Policies:
 - Density and Quantum;
 - Affordable Housing;
 - Tenure Mix;
 - Design.
 - Transport and Highways;
 - Environmental Policies:
 - Trees and Biodiversity;
 - Landscaping and Open Space;
 - Landscape Character and Visual Impact Assessment;
 - Ground Conditions;
 - Noise and Air Quality;
 - Drainage; and
 - Sustainability.
 - Governance:
 - Phasing;
 - Section 106 Agreement and Planning Conditions.

PRINCIPLE OF REDEVELOPMENT

- 6.3 The principle of redevelopment at Fort Halstead is well established in planning policy and the site’s planning history. The 2011 adopted Core Strategy Policy SP8, ‘Economic Development and Land for Business’. The policy seeks the retention, intensification of existing business areas, including Major Developed Sites in the rural areas, subject to Green Belt policy.
- 6.4 Policy SP8 specifically states that:

6.0 Planning Policy Assessment

'sites... will be retained in business use unless it can be demonstrated that there is no reasonable prospect of their take up or continued use for business purposes during the Core Strategy period. Redevelopment for mixed use sites in urban areas may exceptionally be permitted where such development would... meet the needs of modern business.... Where the employment capacity of the site, represented by the commercial floorspace, is maintained and where a mixed-use development would represent a sustainable approach consistent with the general distribution of development.' (Emphasis added).

- 6.5 Subsequently, ADMP Policy EMP3 was drafted to allow for mixed-use redevelopment at Fort Halstead. The ADMP Inspector confirmed in his post-hearing note regarding policy EMP3 (dated 7th April 2014), that [with respect to the relationship between the CS and ADMP]:

'the principle of allowing some residential development on this site is broadly in accordance with CS policy SP8 which enables uses, other than those related to business, to be considered if there is no reasonable prospect of the site's continued use for business purposes.'

- 6.6 The ADMP was adopted in 2015. Policy EMP3 therefore set the site-specific allocation policy context for Fort Halstead. In summary, the policy established the site's definition as a major developed site in the Green Belt (the ADMP did not review Green Belt boundaries) to be redeveloped for a range of employment uses (including R&D, offices, workshops) to generate at least the number of jobs on site when Dstl announced it would be vacating (which was 1,200 jobs); and then up to 450 residential units as part of the mixed-use scheme, possibly also a hotel and other supporting community infrastructure.
- 6.7 The policy also provided specific detailed development management guidance on the requirement for a Travel Plan to maximise the sustainability of the site, walking and cycling infrastructure (including PROW), accessibility to jobs, achievement of the Kent Downs AONB Management aims and objectives, Transport Assessment to identify impact and any required mitigation, integration of designated heritage assets, integration of existing dwellings located off Crow Drive, sustainable design, green infrastructure and connectivity and a phasing strategy. These specific matters are dealt with under the subsequent topic areas discussed within this section.
- 6.8 The 2015 OPA was subsequently brought forward in this policy context, and was determined to be compliant with this policy framework.
- 6.9 The extant 2015 OPP establishes therefore the principle of this redevelopment, as it has been sufficiently demonstrated that the site can come forward in a way which meets the policy requirements and objectives.
- 6.10 As set out in Section 5.0, SDC is in the process of undertaking a new Local Plan as established by the requirement in the NPPF (which the Core Strategy pre-dates), set out at paragraph 33 that:

'Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.' (Emphasis added).

6.0 Planning Policy Assessment

- 6.11 Accordingly, SDC have had to consider the following changing circumstances in the development of their new Local Plan:
- The 2019 NPPF, which specifically required that strategic policies should provide for objectively assessed housing needs as a minimum;
 - An objectively assessed housing need figure which is substantially higher than the adopted Core Strategy housing target;
 - A 'duty to cooperate' with cross-boundary neighbouring authorities – and a lack of capacity in neighbouring authorities to assist in meeting SDC's objectively assessed need;
 - A requirement in the NPPF for strategic policies to maximise the efficient use of previously-developed or brownfield land;
 - When considering the Green Belt, consider releasing (if this is demonstrated to be required) land which has been previously developed.
- 6.12 Through the emerging Local Plan, SDC has undergone a rigorous assessment and consultation process, which MPF has contributed to. This new national policy framework provides a different context to which the ADMP allocation was pursued, and accordingly the emphasis on meeting objectively assessed needs in full as far as possible, and prioritising efficiency on brownfield sites has allowed MPF and SDC to reconsider the site's potential contribution to SDC's Local Plan.
- 6.13 Throughout the consultations supporting the Local Plan, MPF has provided evidence and support for the allocation of the site for 750 residential units, maintaining the consented quantum of employment floorspace and refining the village centre and heritage proposals. This has been assessed through SDC's sustainability appraisals and consulted on by the general public and statutory consultees.
- 6.14 In addition, SDC has provided specific technical topic papers, undertaken duty to cooperate and justified the release of the site from the Green Belt as part of its district-wide exceptional circumstances case (supported by a robust assessment of the Green Belt).
- 6.15 The Examination in Public into the submission Local Plan commences in September 2019. At this stage, the Inspector's Matters have not raised any in principle/fundamental issues which might indicate that this Local Plan will not be progressed (i.e. the Inspector is proceeding with the Examination, on the basis that any queries can be dealt with through the hearings and subsequent modifications).
- 6.16 The NPPF notes that (at paragraph 48):
- Local planning authorities may give weight to relevant policies in emerging plans according to:
- a) *the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
 - b) *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
 - c) *the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)*

6.0 Planning Policy Assessment

- 6.17 In response to part a), the plan is at Examination stage, and as such, significant weight can be afforded to it given the late stage of preparation.
- 6.18 In response to part b), the AONB Board has objected to all allocations within the AONB. There are no other statutory consultee objections.
- 6.19 In response to part c), it is considered that the submission Plan is consistent with the NPPF.
- 6.20 Accordingly, SDC are able to give considerable weight to the submission Plan which includes the site-specific allocation of the site and its release from the Green Belt established by strategic policies. Thus the principle of redevelopment for the proposals set out in this planning application are wholly supported by planning policy.

PRINCIPLE OF DEVELOPMENT IN THE GREEN BELT

Policy Context

- 6.21 The NPPF sets out at paragraph 133 that the essential characteristics of the Green Belt are their openness and their permanence.
- 6.22 The purposes of the Green Belt are set out at paragraph 134:
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.23 Paragraph 145 sets out that the construction of new buildings is inappropriate in the Green Belt unless the proposals comprise:
 - a) buildings for agriculture and forestry;
 - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
 - c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
 - e) limited infilling in villages;
 - f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
 - g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development;
 - or

6.0 Planning Policy Assessment

– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

- 6.24 Paragraph 143 states any other form of development is deemed to be inappropriate and should not be approved except in very special circumstances ('VSC'). Paragraph 144 sets out that VSC will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 6.25 Paragraph 136 establishes that Green Belt boundaries can only be amended through the production of a new or updated Local Plan. Where a Local Planning Authority proposes to amend Green Belt boundaries as part of the production or review of a Local Plan, the Local Planning Authority must demonstrate that 'exceptional circumstances' exist to justify boundary amendments.
- 6.26 At a local level, the Policy LO8 'The Countryside and the Rural Economy' of the adopted CS states that the extent of the Green Belt will be maintained.
- 6.27 Within the submission Local Plan, draft Policy ST1 ('A Balanced Strategy for Growth in a Constrained District') states that development will be permitted in the Green Belt where it includes the re-use of previously developed brownfield land. However, it further sets out that where development will result in significant improvement in the sustainability of settlements through the provision of social and community infrastructure, in areas currently lacking such facilities, Green Belt boundaries will be altered to enable sites to be removed from the Green Belt and be allocated for development, in order to promote sustainable patterns of development as justified by 'exceptional circumstances'.

Policy Assessment

- 6.28 SDC has produced topic papers in relation to the submission Local Plan. The 'Development Strategy' topic paper notes the significant increase in objectively assessed housing need faced by SDC, and as such notes that '*Since this is more than quadruple the existing target, a different approach is proposed, to provide sustainable growth in a constrained District.*'
- 6.29 As SDC is 93% Green Belt, it is considered by SDC that Green Belt release is necessary, and as such, has set out in the topic paper, how this policy approach has been robustly justified, in accordance with national Green Belt policy on 'exceptional circumstances'.
- 6.30 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, paragraph 137 of the NPPF requires that Local Authorities demonstrate that the strategy:

a) *Makes as much use as possible of suitable brownfield sites and underutilised land.*

The SDC topic paper sets out how supply from these sources has been maximised through 'call for sites' processes, brownfield and underutilised land supply and urban regeneration. In the resulting policy approach, development has been directed to town centres and settlements ahead of the Green Belt. Draft Policy ST1 states that development will be focused within the boundaries of existing settlements, including building at higher density on non-Green Belt land. The policy further encourages the re-use of previously developed 'brownfield' land, including land in the Green Belt where it is situated in sustainable locations.

Local Plan supporting paragraph 1.7 goes into further detail, setting out the preferred spatial strategy to accommodate development need is to;

6.0 Planning Policy Assessment

- Focus growth in existing settlements, including at higher density;
- Redevelopment of previously developed 'brownfield' land in sustainable locations;
- Development of greenfield Green Belt land only in 'exceptional circumstances', particularly where social and community infrastructure is being proposed, which could help address evidenced infrastructure deficiencies in the area.

The topic paper and supporting paragraph 1.8 clearly states that all potential sources of housing supply have been interrogated before any amendments to the Green Belt were considered.

- b) *Optimises the density of development in line with Chapter 11 of the NPPF, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport and;***

The Delivery Topic Paper sets out the NPPF (paragraph 122) basis for encouraging efficient use of land and demonstrates that SDC has utilised a density matrix (set out in the "Site Appraisal Methodology" document) applied to the proposed site allocations set out under policy ST2, allowing an average density of 60 dph across the District (set out in emerging Policy H5 ('Housing Density')). Local Plan Policy supporting paragraph 135 goes onto acknowledge that given the substantial need for new homes, and the fact that the Green Belt covers the vast majority of the District, it is therefore crucial that the limited amount of land within settlement boundaries and other land already development is used efficiently when considering proposals for new development.

- c) *Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.***

Supporting paragraph 1.9 of the submission Local Plan sets out that as SDC have recognised they will be unable to meet their substantial housing need, they have consulted with neighbouring authorities to ascertain whether they can help to meet some of their need through the Duty to Co-operate process. Capacity within the West Kent housing market area, as well as adjacent housing market areas has been carefully considered, with liaison between neighbouring authorities undertaken. As a result, Statements of Common Ground have been produced with the following neighbouring authorities:

- Tandridge District Council (December 2018)
- Dartford Borough Council (May 2019)
- Wealden District Council (April 2019)
- Gravesham Borough Council (May 2019)
- London Borough of Bexley (May 2019)

All of the above neighbouring authorities have confirmed that they are unable to assist SDC with the unmet housing need, however they will continue to work together to identify the position as each authority prepare their Local Plans at least every five years.

A Memorandum of Understanding with Maidstone Borough Council has also been prepared to explore Duty to Cooperate issues which might not be able to be met within the housing market area.

6.0 Planning Policy Assessment

- 6.31 There is no national definition of ‘exceptional circumstances’. The exceptional circumstances case put forward by SDC is set out in the Development Strategy Topic Paper and essentially comprises the following reasons:
- SDC cannot meet its housing need on the 7% of land within the District which is not Green Belt, and no neighbouring authority is able to assist with this need. Therefore, the scale of this need, including for affordable housing, is considered to amount to ‘exceptional circumstances.’
- 6.32 The site specific exceptional circumstances are then considered in the following context:
- The extent to which land meets the purposes of inclusion in the Green Belt, as set out in the Green Belt Assessment (2017)
 - Whether the release of land will result in the delivery of infrastructure to meet an existing evidenced-based need; and
 - The overall sustainability of the proposals, as assessed by the Sustainability Appraisal of the Local Plan, including whether it is previously-developed or brownfield land.
- 6.33 Further to this, on a site specific level, the submission Local Plan sets out how exceptional circumstances have been assessed as per relevant case law (High Court Decision of *Calverton Parish Council v Greater Nottingham Councils*, case no: CO/4846/2014) and is built around the below points (with commentary added in relation to the Fort Halstead site assessment against these ‘exceptional circumstances’):
- **The nature and extent of harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed):** the majority of the Fort Halstead site comprises Previously Developed Land, which is not considered to make a strong contribution to the five purposes of the Green Belt as set out in paragraph 134 of the NPPF (Appendix B of this Planning Statement sets out the assessment of the site against the NPPF purposes). This is also established by the Green Belt Assessment which sets out that *‘it is judged that an identified sub-area in the south of the Parcel incorporating the Fort Halstead site (RA-22) may score weakly against the NPPF purposes if considered alone’*. Furthermore, in terms of the ‘essential characteristics’, the site is not currently permanently open, given the significant quantum of existing development, some of which has existed since before the legislative introduction of the Green Belt. The height and massing of the proposals has been sensitively considered and will not impact on openness relative to the existing conditions on the site. The significant green infrastructure features proposed as part of the development (for example landscaping including green fingers, village green, woodland edge and footpaths) will also enable the site integrate with, as opposed to harm, the surrounding Green Belt landscape.
 - **The inherent constraints on supply/availability of land prima facie suitable for sustainable development:** Sevenoaks is a highly constrained District with 93% being located within the Green Belt. Therefore, even if high density growth is focused in existing settlements and the redevelopment of brownfield land is maximised, SDC will not meet their government prescribed housing target. As such, in order for SDC to deliver much needed housing there needs to be development on sites which are currently situated in the Green Belt. Fort Halstead specifically has been identified by SDC as a previously developed site within the Green Belt which is capable of accommodating increased development density beyond that consented as part of the previous OPA, achieving an overall density of 46.33dph. The release of the site from its Green Belt designation will therefore enable an additional 350 homes to be delivered on site and will help to protect the release of other greenfield Green Belt sites within the District.

6.0 Planning Policy Assessment

- **The acuteness/intensity of the objectively assessed need (matters of degree may be important):** SDC have an Objectively Assessed Housing Need (OAHN) of 13,690 homes over the Plan period, annualised at the 689 per annum. SDC could identify a housing supply from non-Green Belt land of 5,768 dwellings. Within the submission Local Plan SDC has identified a current supply of 10,568 homes over the Plan period, and have stated that currently they are not able to demonstrate how they will meet their housing need in full. This comprises all non-Green Belt land, previously developed Green Belt land and Strategic Green Belt greenfield land with social/community infrastructure delivery. To achieve this 10,568 figure it is necessary for sites within the Green Belt to be included and considered for release to ensure SDC can go some way to meeting its housing need. Without reconsideration of the extent of the Green Belt, SDC would deliver significantly less housing than the 10,568 homes currently identified (i.e. c.50% less). The proposals for Fort Halstead, which comprise up to 750 new homes, represent a significant contribution to achieving SDC's OAHN.
 - **The consequent difficulties in achieving sustainable development without impinging on the Green Belt:** As set out above, given only 7% of the District is not within the Green Belt, there is consequently not sufficient urban land to meet the District's housing needs without releasing some Green Belt. In order to achieve a sustainable supply of housing, it is necessary for sites such as Fort Halstead to be released from the Green Belt and sensitively maximised for their development potential.
 - **The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent:** The Green Belt Assessment considers that there is scope for sub-division of the wider Green Belt parcel Fort Halstead sits within it and that it could therefore be removed from its Green Belt boundary without harming the wider Green Belt area. As shown through the Green Belt purposes assessment at Appendix B, the potential harm to the Green Belt purposes is minimal. The site is also not currently an open site, comprising significant built development with 60,686 sq m of development footprint currently on the site.² The proposals will result in 49,261 sq m of development footprint, representing a significant overall reduction. Furthermore, the maximum height on the site of any building or external chimneys/flues has been reduced from 21.5m (building N2) and 18.5m (chimney of the boiler house) respectively, to a maximum 'landmark building' within the mixed-use village centre at 4 storeys/16m, thus reducing the visual impact of the site from its environs. As shown through the LVIA, the impact on the openness of the Green Belt resulting from the development is no greater than the current developed site or the 2015 permission and as such the impacts have been minimised and in some areas improved.
- 6.34 As well as the above, SDC, through the submission Local Plan, have also added the following further considerations as relevant to exceptional circumstances:
- **The extent to which land meets the purposes of inclusion in the Green Belt, namely the five key tests set out in paragraph 134 of the NPPF:** refer to Appendix D for an assessment of the site against paragraph 134.
 - **Whether the release of land will result in the delivery of infrastructure to meet an existing evidence-based need;** land is to be safeguarded for the provision of a 1 FE primary school which is required in the latter stages of the Plan to address the additional need for school

² As established by Certificate of Lawfulness for an Existing Use and Development (CLEUD) of 82,186 sq m development footprint (reference: 03/02897/LDCGX) granted in 2004, with demolished buildings deducted.

6.0 Planning Policy Assessment

places generated through both the redevelopment of Fort Halstead and the other site allocations in the surrounding area. It is not possible for the existing Halstead Primary School to expand to accommodate this need and therefore KCC Education have identified Fort Halstead as being the most suitable site for a school to be located.

- **The overall sustainability of the proposals, as assessed by the Sustainability Appraisal of the Local Plan:** the Sustainability Appraisal (non-technical summary) to the Local Plan sets out that:

‘The recycling or re-use of land that has been previously developed is sustainable in that it means that potentially less greenfield Green Belt land needs to be considered for development.’

- 6.35 Therefore, it is considered that the promotion of the site for development is inherently sustainable, by virtue of the redevelopment of brownfield previously developed land, which enables the protection of greenfield Green Belt land elsewhere. Furthermore, the ability of the scale of the site to provide infrastructure, to meet not only the needs of the development but also local needs and integration through providing public transport. The site already benefits from an extant planning permission for 450 homes, and the uplift in residential numbers will only assist the sustainability of the site, its employment areas and local services.
- 6.36 As part of the submission Local Plan, SDC has undertaken an extensive Green Belt Assessment and has set out a well-evidenced case for the exceptional circumstances required to amend the District’s Green Belt boundaries. Prior to this review, the Green Belt had not been reviewed since 2013.
- 6.37 The Green Belt Assessment methodology was to divide the District’s Green Belt into parcels for detailed assessment against the NPPF’s Green Belt purposes. Subject to the initial parcel assessment, sub-areas are then defined where there are areas requiring further assessment. The site is located within Parcel 76, which is a 739.1ha parcel encompassing Halstead, bordering Greater London and Badger’s Mount. Fort Halstead is located within the south of this parcel, and, further to the parcel assessment, is identified as sub area RA-22. The Green Belt Assessment concludes the following when scoring the sub-area against the purposes of the Green Belt:

“It is judged that an identified sub-area in the south of the Parcel incorporating the Fort Halstead site (RA-22) may score weakly against the NPPF purposes if considered alone. It constitutes an extensive area of existing encroachment and possesses a semi-urban character (Purpose 3). It is generally inward facing, separated from the wider countryside by extensive, dense planted buffer, thus limiting its role in preventing coalescence between settlements (Purpose 2). Furthermore, its distance from the edge of Greater London and its status as a standalone built-up area means that it would not constitute sprawl (Purpose 1).”

- 6.38 The Green Belt Assessment concludes, in relation to parcel RA-22, that:
- “The Recommended Area is judged to have a low sensitivity to residential and mixed use development, by virtue of existing development influences and its heavily enclosed. Based on the assessment above, in landscape and visual terms the Recommended Area could be released without fundamentally changing the wider landscape character due to the strong level of enclosure. However, recommendation would be given to sensitive re-development of the Recommended Area with a focus on retaining and enhancing the green infrastructure qualities of the remaining*

6.0 Planning Policy Assessment

woodland as if removed it could result in a fundamental adverse impact upon wider landscape character.”

- 6.39 As a result, while the wider Parcel is considered to meet the NPPF purposes to a moderate degree, the Green Belt Assessment concludes there is scope for sub-division. As the Fort Halstead sub area scores weakly, there is an opportunity for it to be considered further for possible review and removal from the Green Belt boundary given it would not significantly infringe on the purposes of the Green Belt, as defined by paragraph 134 of NPPF, as set out at Appendix B which provides the assessment of the site against the purposes.
- 6.40 As a result of the submission Local Plan strategy supported by the Green Belt Assessment, the site has been proposed for Green Belt release in the submission Local Plan as part of its allocation for an additional 300 units (beyond the extant OPP of 450 units resulting in a total of up to 750 units).

HPA Determination

- 6.41 This planning application has been submitted in advance of the adoption of the Local Plan, which seeks to release the site from its Green Belt designation as part of the overall development strategy. It is envisaged that the planning application is capable however, of being determined in advance of adoption of the Local Plan.
- 6.42 NPPF Paragraph 145 notes exceptions to development in the Green Belt being considered ‘inappropriate’, including:
 - g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - not have a greater impact on the openness of the Green Belt than the existing development; or*
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*
- 6.43 The proposed development will comprise approximately 49,261 sq m in building footprint. The existing development on site (based on the CLUED figures of currently existing buildings) is currently 60,686 sq m, representing a significant overall reduction in building footprint and furthermore the removal of large areas of hardstanding. The extant OPP was considered to be appropriate development in the Green Belt.
- 6.44 The proposed development is considered to be appropriate development in the Green Belt by virtue of it not having a greater impact on the openness of the Green Belt than the existing development. Indeed, the proposed development mix has no greater impact than that granted by the 2015 OPP for the following reasons:
 - The loss of B2 use from the scheme (large industrial sheds) has improved efficiencies in the employment areas, allowing greater employment floorspace of higher quality and appropriate to the site and market requirements, to be achieved on a smaller parcel;
 - The assumed housing mix now favours more smaller units, and includes an element of low-rise flatted development which has a more efficient plot layout and achieves a higher density within the same development parcel areas. Indeed, SDC’s emerging policy approach on density (seeking 60 dph average across the District), as well as the Design Review Panel process and feedback has established that there is a shift in the

6.0 Planning Policy Assessment

perception of densities. The site now offers an average density of 46dph in comparison to the OPP at 34dph;

- Building heights, whilst including some 3 and 4 storey elements, all remain within the previously EIA tested height parameters for the main parcel and the LVIA establishes they remain below the tree lines, with any breaches indiscernible (NB: the previous consent had a higher permitted 'flue zone' for the potential District Heating Centre which would have been more perceptible from outside the site than the proposed development);
 - The hotel element of the scheme has been removed (i.e. removal of c.4,000 sq m GEA) and associated parking and outdoor areas enabling the redistribution of employment and residential uses;
 - The open space proposals have been redesigned from a large village green to provide more natural, integrated and useable network of open spaces and a village green and square more closely associated with the village and heritage centre.
- 6.45 Two further land plots, which were not proposed for development through the OPP (the helipad and the northern bunkers) are located within the Fort Halstead demise, are previously developed, operational and well contained by extensive tree coverage.
- 6.46 As such the proposed development will not have a greater impact on the openness of the Green Belt than the existing development in line with paragraph 145 (g). Moreover, the proposed development will provide much needed affordable housing in accordance with SDC's identified local affordable housing need.

PRINCIPLE OF DEVELOPMENT WITHIN THE KENT DOWNS AREA OF OUTSTANDING NATURAL BEAUTY

Policy Context

- 6.47 The majority of the site falls within the Kent Downs AONB. The Landscape and Visual Impact Assessment contained in the Environmental Statement, and the AONB report fully address the impacts of the proposals on the AONB. A summary is provided below.
- 6.48 Paragraph 172 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. It goes on to state that major developments within these designated areas should be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
- a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- 6.49 In terms of adopted policy, CS Policy LO8 ('The Countryside and Rural Economy') seeks to conserve and enhance the Kent Downs AONB and its setting. In accordance with the NPPF, ADMP Policy EN5 (Landscape) assigns the Kent Downs AONB and its setting the highest status of protection in relation to landscape and scenic beauty. The policy requires that proposals

6.0 Planning Policy Assessment

are appropriate in design and scale, and that the relevant AONB Management Plan is considered.

- 6.50 Emerging Policy LA1 ('Landscape and Areas of Outstanding Natural Beauty') continues to provide the highest level of protection to the Kent Downs AONB. It further sets out that proposals must conserve the character of the landscape and its special qualities, demonstrating appropriate scale and form, layout in relation to adjacent settlements, and use of materials and colours. The draft policy also sets out a number of enhancements which proposals could incorporate in order to enhance the AONB.
- 6.51 The key objectives of the Kent Downs AONB Management Plan (Second Revision April 2014) are to support sustainable development; protect and enhance landscape character, biodiversity, woodland/trees, heritage; and support communities and access.

Policy Assessment

- 6.52 The location of the site within the Kent Downs AONB is a key characteristic of the site and has influenced the proposed development and wider treatment of the land within the Applicant's ownership.
- 6.53 An AONB Report has been prepared by LDA Design which provides an appraisal of how the proposed development will contribute to the statutory duties and benefit the natural beauty criteria of the Kent Downs AONB. The AONB Report concludes that the potential effects of the development proposals on the natural beauty criteria of the Kent Downs AONB (i.e. Landscape Quality, Scenic Quality, Relative Wildness, Relative Tranquillity, Natural Heritage Features, and Cultural Heritage Features) will be beneficial. Beneficial measures include the following:
- Removing the existing poor quality industrial and office type buildings and areas of hard standing;
 - Delivery of a well-designed settlement that reflects the existing structure of the site and creates high quality buildings and open spaces;
 - Key landscape features within the site, such as ancient woodland and areas of chalk, semi-improved and neutral grassland, will be retained and enhanced through active management. Individual trees will also be retained and incorporated into the proposed green infrastructure;
 - Integration into the landscape, whereby the developed areas remain contained with a robust woodland buffer with new open space and landscaping ensuring that all ancient woodland around the Site would be retained and managed (including canopy thinning, re-coppicing and planting of native species), with a 15m buffer between the ancient woodland and any new built development;
 - The large areas of chalk grassland to the south and neutral grassland to west of the Site would be retained and enhanced through an appropriate management regime;
 - All new built development situated behind the existing woodland that sits along the top of the scarp, ensuring that there will be no impact on views of the site from elsewhere in the AONB. In fact, there will be an improvement through the removal of the taller visible structures (including buildings N2, X40 and X54 which are visible beyond the perimeter vegetation) and visible chimneys and flues;

6.0 Planning Policy Assessment

- Removing floodlighting and ensuring that replacement lighting is appropriate to its context, reducing the orange 'aura' currently visible above the Site at night so that the 'aura' becomes more white;
 - Enhancement to the existing and provision of new footpaths, discouraging human related disturbance away from ecologically sensitive habitats and protected species;
 - The Development will enhance natural heritage features, ensuring the sensitive management of the ancient woodland, historic mature trees and areas of chalk, semi-improved and neutral grassland;
 - The Development will enable and enhance understanding, appreciation and interpretation of designated heritage assets, including the Fort which is a Scheduled Monument, and Listed Buildings on site, none of which have been open to the public before;
 - The Development will benefit the understanding and enjoyment of the AONB, and the social and economic wellbeing of communities within the AONB.
- 6.54 The above are consistent with the aims and objectives of the Kent Downs AONB Management Plan. A range of new employment, housing, community, heritage and recreational facilities will be created, including providing public access and interpretation of the site. The application is accompanied by a LVIA (Volume III 7.1 of the Environmental Statement) which assesses the impact of the proposals on the AONB and general surrounding countryside. This concludes that the existing site, and the proposed development, would be almost entirely screened from view by the existing woodland buffer and that there would be negligible impact on the surrounding landscape.
- 6.55 Through extensive design-focussed meetings, the provisions within the Design and Access Statement for this hybrid application, the detailed design guidelines (which include mandatory measures) and character areas have been formulated to secure and ensure that the development phases are of appropriate design and consider the character of the AONB and its positive qualities and unique character of the existing site.
- 6.56 Consideration has also been given to the AONB status for the site in the design of proposals for addressing highways issues and the creation of traffic calming measures and junction improvements, including speed reductions on Star Hill. Care has been taken to avoid urbanising Star Hill, retaining its rural character, in line with guidance from the AONB.
- 6.57 A Lighting Assessment Report (Volume III 3.3 of the Environmental Statement) was prepared to inform the proposals and is submitted with the OPA. This considers the likely lighting impact of the proposed development in terms of sky glow, light intrusion, and luminaire intensity. This report notes that the site as existing, although well screened, is already illuminated by the use of low pressure sodium lighting columns, floodlighting and street lights. It also states that currently, sky glow is clearly visible above the site as an orange 'aura'. The Report concludes that, overall, the artificial lighting impacts associated with the proposals would not have any significant adverse impacts on the surrounding environment. The report anticipates that, through the use of improved photometry, luminaires and design, the visible sky glow is expected to become more 'white than orange, and will therefore be less intrusive to the AONB.
- 6.58 The proposals have evolved with due regard to the principles of the AONB Management Plan, and the requirements of emerging Policy LA1, adopted ADMP Policy EN5 and the design guidance for the emerging site allocation. These include the sustainability and sustainable

6.0 Planning Policy Assessment

transport proposals, social and community facilities, the proposals for the heritage assets, and the landscape, ecology (including ancient woodland) and biodiversity.

6.59 Additionally, it has been considered how the proposals address the requirements of NPPF paragraph 172:

- **The need for the for the development and the impact of permitting it, or refusing it, upon the local economy:** Dstl has confirmed its intention to vacate the site by Q1 2022, and is well advanced in the process of moving its operations to Portsdown West and Porton Down. QinetiQ intends to retain operations on part of the site, post-Dstl’s departure. The development is therefore necessary to provide a range of new employment opportunities, and to prevent the site becoming derelict once Dstl have departed the Site. QinetiQ has also stated that it will only continue to operate from the site if its future is positively planned for, for security and employment/economic sustainability reasons. The development proposals will therefore have a beneficial impact on the local economy, providing a range of high quality employment opportunities through the provision of the innovation hub (B1a, B1b and B1c floorspace) and the mixed-use village centre which provides a range of employment opportunities across B1a and A and D class uses. This will generate in the region of 1,438 jobs, as established by Volume III 6.2 of the ES ‘Socio-Economics’. A mixed-use development is necessary to ensure the continued role of the site as a key employment generator in the local economy, as the 2015 OPP and allocation of the site under ADMP policy EMP3 demonstrated that residential development was required to make the site redevelopment viable and therefore deliverable.
- **The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way:** The Fort Halstead site is already an existing major developed site within the AONB. The proposals provide for the re-provision of development at site to meet local employment, housing and affordable housing needs. Sevenoaks is predominantly rural in character, with 93% of the District designated as Green Belt. The quality of the landscape is a distinctive feature of the area. The national significance of the landscape is recognised by the inclusion of 60% of the District within either the Kent Downs (to the North) or High Weald (to the South) AONBs. The Site is allocated in the CS and ADMP for development for a mixed use employment led scheme. As a result it would not be appropriate to locate replacement development elsewhere on Greenfield undeveloped land in the District. The Site is designated as a Major Developed Site recognition of the extent of built environment on the Site, which covers approximately 60ha of the site. This is established in the submission Local Plan Sustainability Appraisal as contributing towards achieving sustainable development as part of the Plan’s overall strategy.
- **Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated:** Overall, the proposals deliver a range of beneficial impacts providing enhanced opportunities for environmental and landscape improvements and providing significant new recreational opportunities. These are set out in the AONB Report. The existing greenfield land on site will be retained and enhanced through active management and opened for recreational benefit, where it is currently unmanaged and inaccessible to the public.

6.60 It is necessary to redevelop the site to ensure it remains in active use, providing new, modern and high quality employment space to replace jobs lost from the site as a consequence of DSTLs departure, and provide community facilities and new homes and affordable homes for the benefit of the District. QinetiQ has also confirmed that they will only remain on the site if it is positively planned for to enable the business to remain on the site.

6.0 Planning Policy Assessment

- 6.61 These proposals, which represent a viable mixed-use development, have been demonstrated through viability testing and sustainability work to be necessary to enable the most appropriate development for the site, and are therefore necessary in order for the development to proceed and the creation of new jobs and homes to be facilitated. The development proposals will enable the regeneration of an otherwise redundant previously developed site, providing environmental enhancements which will blend the site back into the wider landscape through the introduction of significant green infrastructure, through the conversion and refurbishment of nationally significant historic assets to ensure a viable future, and supporting the local economy. Given the constraints posed by Green Belt and AONB designations across the Sevenoaks area, the alternative to developing on this previously developed land would be to develop elsewhere on non-previously developed Green Belt within the Sevenoaks area.
- 6.62 The proposals would clearly be in the public interest and whilst changing the use and character of the existing site, the principle of which has previously been granted permission, would have a beneficial impact on the character and setting of the AONB. The proposals are therefore in accordance with the provisions of the adopted and emerging Development Plan and the NPPF.

PRINCIPLE OF EMPLOYMENT DEVELOPMENT

Policy Context

- 6.63 Chapter 6 of the NPPF, Building a strong, competitive economy, seeks to provide a planning framework to support businesses develop and adapt, with emphasis on supporting innovation. ‘High tech’ industries are also specifically supported (at paragraph 82).
- 6.64 Adopted ADMP Policy EMP3 is an employment-led policy, which defined Fort Halstead as a major employment site. As such, redevelopment proposals are expected to provide a range of employment opportunities at the site, as part of a mixed-use redevelopment.
- 6.65 Under the submission Local Plan, the site is to be allocated under Policy ST2 (‘Housing and Mixed Use Site Allocations’) for mixed-use development. Appendix 2 of the Plan sets out that the site (reference ST2-57) should include employment provision, ‘to ensure the District’s economy remains dynamic.’ Overall, the Local Plan is seeking to meet the identified need of 11.6ha of employment land. Draft policy EMP1 sets out that:
 - *Redevelopment of employment sites (allocated or non-allocated) for mixed use may be permitted where such development:*
 - *would facilitate the regeneration of the site to more effectively meet the needs of modern business, and*
 - *where the employment capacity of the site, represented by commercial floorspace, is maintained,*
 - *and where a mixed use development would represent a sustainable approach consistent with the general distribution of development.*

Policy Assessment

- 6.66 The site is currently in use for employment purposes, albeit with the ongoing departure of Dstl the onsite job numbers and economic contribution is significantly reducing.
- 6.67 The extant 2015 OPP provided floorspace in accordance with policy EMP3, sufficient to generate the equivalent quantum of jobs as was on site when Dstl announced its departure.

6.0 Planning Policy Assessment

- The extant 2015 OPP maintained 250 jobs for QinetiQ, with an additional 1,026 jobs across B class uses, 207 jobs across leisure/retail/hotel use (resulting in a total of 1,483).
- 6.68 The proposals will provide a similar number of jobs on site as the extant OPP, albeit without the hotel and without jobs generated by B2 industrial floorspace (this is demonstrated in Volume III 6.1 of the Environmental Statement, 'Socio-Economics').
- 6.69 The Employment Opportunities Report assesses the employment market for Sevenoaks as having low unemployment levels and well-qualified residents, a strong rural economy with a high number of residents working from home, and notes that there is strong forecast growth for office space (B1a), there is a lack of supply of high quality B1b space which may be suppressing demand, and Fort Halstead is specifically identified in Sevenoaks' Economic Needs Study for R&D employment opportunities. There is also a shortage of high quality B1c units, particularly smaller scale units and 'hybrid' workspaces.
- 6.70 Whilst there is demand in the District for B2 and B8 uses in the region, the market is smaller scale in Sevenoaks and better quality stock is being located within the wider M25 region elsewhere.
- 6.71 Alongside traditional B-class uses, much consideration has been given to the success factors needed to develop and deliver a successful employment location, which include place-making principles such as community facilities, retail and convenience uses, technological capabilities, sustainability principles, flexible spaces and local connections. The principles guiding Fort Halstead's employment vision have incorporated these elements, in terms of providing a focal point or 'heart' of the development serving the residents and employees, which is provided in the form of the village centre.
- 6.72 The B class uses in the village centre can take on the flexible form which is emerging in popularity and need in the local and wider area (particularly pertinent given that Sevenoaks has a high concentration of home workers), for example through co-working spaces and integration with community spaces for events etc. The space provided will respond to these needs, as the strongest evidence points to a need for smaller scale office space.
- 6.73 B1b and B1c space are more difficult markets to define as Sevenoaks has a lack of strength in this area, potentially owing to the current lack of quality supply.
- 6.74 Therefore, the overall balance of proposed employment development has responded to this evidence, providing a mix of B1a, B1b and B1c floorspace across the employment areas on the site.
- 6.75 Of the existing buildings on the site, a number are in/have most recently been in use as B class employment buildings. Therefore, there is an opportunity for early delivery of employment space in these buildings once any refurbishment works have been undertaken as required. These could provide B1a space in buildings Q13, Q14, A1, A3 A13 and A14 and B1b/c space in buildings A10, A11, X2, X3, X38. This equates to almost 6,000 sq m of B class floorspace, which can be flexibly refurbished to support a range of businesses.
- 6.76 It should be noted that many of Dstl's employees, owing to the highly secure and specialised nature of their work, do not live within the District. This application therefore will therefore enable a potentially more local workforce, as a wide range of job types can be provided as a result of the range of B class, A class and D class uses.
- 6.77 The hybrid application process in relation to the employment space has been undertaken on the basis of local and recent evidence in relation to the employment market in the area and in consideration of the site's characteristics. It will provide the same number of jobs as the OPP provided for, but with the removal of B2 uses and hotel, and the increased

6.0 Planning Policy Assessment

provision of employment areas delivering a range of B1 uses to allow flexible use by a range of businesses throughout the life of the development. As such, it will ensure that the site has the best chance of being able to support high quality businesses and employment, and act as a successful component of a mixed-use development, as well as provide a thriving business community to sit alongside QinetiQ.

PRINCIPLE OF RESIDENTIAL DEVELOPMENT

Policy Context

- 6.78 Chapter 5 of the NPPF sets out the Government’s approach to delivering a sufficient supply of homes. This includes providing for a range of tenures and ensuring sufficient land is allocated for homes. Paragraph 59 requires that a sufficient amount of land can come forward where needed to support the government’s objective to significantly boost the supply of homes. To support this, paragraph 117 requires that planning decisions should promote an effective use of land in meeting the need for homes and other uses.
- 6.79 As part of the site’s allocation under adopted Policy EMP3, the delivery of up to 450 homes was identified as appropriate on the site. The extant outline planning application subsequently obtained permission for 450 homes alongside other uses in line with the allocation at EMP3.
- 6.80 Under the submission Local Plan, the site is to be allocated under Policy ST2 (‘Housing and Mixed Use Site Allocations’) for a further 300 homes, facilitating the delivery of up to 750 homes on the site. The delivery of this number of homes represents a significant contribution to SDC’s OAHN figure of 13,690 homes over the Plan period (698 homes p/a). As set out previously in this Planning Statement, SDC has identified a current supply over 10,568 homes over the Plan period, and are not able to demonstrate how they will meet their housing need in full.

Policy Assessment

- 6.81 The site already benefits from an adopted employment led mixed-use site allocation, an extant planning permission for a mixed use development and an emerging allocation which supports the provision of an increased quantum of residential units whilst supporting the employment focus of the site. Therefore, the principle of residential development on the site has been firmly established.
- 6.82 As set out throughout this Planning Statement, there is a significant recognised housing need in SDC. The submission Local Plan clearly sets out that the majority of this housing need should be met through the delivery of allocated sites within the District. Under emerging Policy ST1, SDC encourage the reuse of previously developed ‘brownfield’ land, including land in the Green Belt, where it is situated in sustainable locations.
- 6.83 As part of the emerging Local Plan process, SDC’s initial Regulation 18 consultation version of the Plan recognised Fort Halstead as a site which could be capable of accommodating a greater development density than currently consented. Subsequently, detailed masterplan and design feasibility work was undertaken to help inform the Local Plan process, which concluded that the site can accommodate up to 750 homes in total, whilst fully maintaining the required quantum of employment space to provide equivalent job generation.
- 6.84 This has been acknowledged by SDC through the site’s emerging allocation, which considers the site has a capacity for an additional 300 units beyond the 450 already consented. On the basis that the principle of residential development has already been established on the

6.0 Planning Policy Assessment

site, and it has been demonstrated to SDC’s satisfaction that the site can accommodate a 300-unit uplift, it is considered that the principle of up to 750 homes on site is acceptable. This should be further considered in the context that SDC are unable to meet their OAHN figure, and as a constrained district need to maximise previously developed sites to help achieve their challenging housing target.

- 6.85 The proposed development continues to support a mixed use development approach, with a balance of uses, and a focus on ensuring the early delivery of employment space, the retention of QinetiQ and creating a viable business environment to attract high quality businesses.

RESIDENTIAL DENSITY AND QUANTUM

Policy Context

- 6.86 Paragraph 123 of the NPPF sets out that where there is an existing or anticipated shortage of land for meeting identified need that it is important that planning decisions avoid homes being built at low densities.
- 6.87 Paragraph 117 requires that planning decisions should promote an effective use of land in meeting the need for homes and support development that makes efficient use of land to achieve appropriate densities. The proposals represent an efficient use of land without an adverse impact to the surroundings, as demonstrated by the supporting technical documents.
- 6.88 Adopted CS Policy SP7 (‘Density of Housing Development’) directs density of residential development within rural areas at 30 dwellings per hectare, within higher densities sought in the main settlements. It states that development must make efficient use of land for housing.
- 6.89 Emerging Policy H5 (‘Housing Density’) states that all new housing development will be expected to make the most efficient use of land. The draft policy recognises that in the recent past development has been delivered at an average density of 60 dwellings per hectare, and that new development will be expected to deliver at higher densities appropriate to the size and location for the scheme. It further considers that proposals for housing development at higher densities than those typically found in the surrounding area will be permitted where it can be shown that the proposal:
 - Is of high quality design and respects local character;
 - Includes a mix of housing types and sizes that reflect identified needs;
 - Is well served by public transport, walking and cycling routes, local services and community facilities;
 - Demonstrates that the area is able to accommodate additional development at the density proposed.
- 6.90 The design guidance at Appendix 2 of the submission Local Plan for the emerging Fort Halstead allocation sets an overall density across the site of 40 dwellings per hectare (dph).

Policy Assessment

- 6.91 The average proposed residential density on site is c.46 dph (including the mixed-use areas), ranging from a maximum density of 25 dph at the Gateway Hamlets, to 60 dph within the Village Centre where more efficient use of land is made for housing through low level apartment blocks. The density levels for each character area has been carefully considered to ensure that a denser place-making character is fostered in the Village Centre, whilst those

6.0 Planning Policy Assessment

dwelling located further away from the centre towards the woodland edge and at the gateway locations, are provided at lower densities. This reflects the sensitive environmental relationship in this location within the AONB, in accordance with the provisions of the adopted and submission Development Plan and the NPPF.

- 6.92 The OPP had a lower overall average density (34 dph), and a lower maximum parcel density (45 dph). The increase in unit numbers has, predominantly been achieved through improvements to the masterplan layout, siting and the density of plots, as well as re-imaging the open space as more appropriately scaled and integrated into the development parcels to make more useable and relatable. Some higher density development has been achieved by responding to SDC's latest evidence base on housing need, which is for more smaller units, thus being more suited to apartments which suit the character of the village centre and allow it to therefore achieve higher density.
- 6.93 Whilst an average District-wide density of 60 dph as sought by emerging Policy H5 is only achieved on site within the Village Centre, the average density of 46 dph is considered to be the most appropriate and sustainable density level for the site given the existing site character context and location within the Kent Downs AONB and is in line with the site Design Guidance within the submission Local Plan. The engagement with the Design Review Panel focussed the design further on achieving the maximum appropriate density through character area assessment. This ensures that the range of characters provided across the site respond to the range of physical features throughout, including the woodland, open space, heritage assets and topography. This creates a natural variance in density and character.

AFFORDABLE HOUSING

Policy Context

- 6.94 Paragraph 62 of the NPPF defers specific affordable housing policy to local planning authorities, however it does expect affordable housing policy requirements to be met on-site unless the off-site provision or an appropriate financial contribution in lieu can be justified, and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 6.95 Adopted CS Policy SP3 ('Affordable Housing') details the expected provision of on-site affordable housing. For developments of over 15 dwellings, 40% of dwellings are expected to be provided as affordable. However, in exceptional circumstances, the Council will accept a reduced provision where a viability assessment (which has been independently assessed) has concluded as such.
- 6.96 Emerging Policy H2 ('Provision of Affordable Housing') has a requirement that for already developed sites of over 15 dwellings, 30% of dwelling are expected to be provided as affordable, and should be provided on-site unless the Council advises that a financial contribution is preferred. In relation to the tenure split, the preferred mix is 76% social/affordable rented and 24% intermediate housing.
- 6.97 Should an independent viability assessment demonstrate that on-site provision in accordance with policy would not be viable, draft Policy H2 sets out that the Council will consider the following options in priority order:
- A reduced level of provision on-site plus a financial contribution in lieu of the shortfall;
 - A financial contribution in lieu of any affordable housing on site;

6.0 Planning Policy Assessment

- Provision of the number of affordable units on an alternative site within Sevenoaks District, to be secured by the applicant and agreed by the Council.

Policy Assessment

- 6.98 The proposals will provide 25% affordable housing on site, split between social rented and shared ownership (35%/65% respectively). A detailed Financial Viability Appraisal is submitted alongside this application and demonstrates that this is the best possible offer for on-site delivery of affordable housing, taking into account the overall scheme viability. The viability appraisal process has been the subject of early discussions with Council’s viability advisors (Dixon Searle) regarding inputs and assumptions, and will be independently reviewed and scrutinised by Dixon Searle during the course of the application.
- 6.99 There are significant abnormal costs associated with the initial phases of the development, which include:
- Major utilities infrastructure replacement (water, electricity, communications, drainage);
 - Road junction works and replacement/new internal roads;
 - Land forming work and remediation;
 - Landscape management and enhancement, including the ancient woodland;
 - Securing and repairing existing buildings for use for employment in the early phases of development and including the Fort which includes listed buildings and is a scheduled monument;
 - Providing site-wide security to enable QinetiQ to remain on site once Dstl vacate;
- 6.100 These costs all place a significant burden on the development and as such, the development is not able to provide the full policy-compliant level of affordable housing. However the maximum provision capable of being provided has been proposed.
- 6.101 In terms of the specific type of affordable housing product, we have engaged with SDC’s housing officers throughout the course of the planning application, and at each stage of reserved matters, there will be further opportunity for securing specific types to meet the specific needs of the population at that point in time.
- 6.102 The illustrative masterplan and parameter plans allow for a range of types of affordable product to come forward across the site, including apartments, houses and types of assisted/extra-care living. It is most appropriate to deal with the specific type of accommodation at reserved matters stage, in order that the development is able to respond to the most pressing and relevant housing need at that point in time, which is pertinent as the development is likely to be phased and therefore come forward over a number of years.
- 6.103 Additionally, through the Section 106 Agreement, the proposals can commit to a Community Lettings Policy Agreement for rented homes, to be allocated to those registered on the Sevenoaks District Housing Register, and including other local criteria, such as Local Essential Workers, to be agreed with SDC Housing Officers. It is important for the development to provide specific local benefits, given that the area has not benefited from major development which delivers on site affordable housing for a significant time.

6.0 Planning Policy Assessment

HOUSING MIX

Policy Context

6.104 The NPPF defers precise housing mix policies to local planning authorities. Emerging Policy H1 ('Market and Affordable Housing Mix') states that new housing development will be expected to contribute to a variety of house sizes in line with the requirements set out in the table below, where appropriate, to increase the proportion of smaller units unless it can be demonstrated that an alternative mix meets an identified local need:

	1 BED	2 BED	3 BED	4 BED
Market	5-10%	25-30%	40-45%	20-25%
Affordable	30-35%	30-35%	25-30%	5-10%
All dwellings	15-20%	25-30%	35-40%	15-20%

6.105 In relation to wheelchair units, emerging Policy H1 requires that at least 5% of dwellings should meet M4(3) standard.

6.106 In relation to the unit sizes, emerging Policy H1 has a requirement for all units to meet the minimum nationally described space standards.

Policy Assessment

6.107 Whilst the unit mix breakdown in relation to the affordable units is not fixed at this stage, in relation to the general provision of dwellings, the proposals provide the following indicative housing mix (represented by the illustrative masterplan):

	1 BED	2 BED	3 BED	4 BED
Units	83 (11%)	280 (37%)	237 (32%)	150 (20%)

6.108 Therefore, the housing mix that has been demonstrated through the illustrative masterplan, is broadly in accordance with the policy requirements, and will clearly create a mixed and balanced community, with a focus on ensuring that sufficient smaller units are provided for first time buyers and downsizers, as well as affordable housing.

6.109 At least 5% of dwellings will be provided to meet Part M4(3) standard for wheelchair user dwellings, as required by policy H1 for developments of over 20 units.

6.110 It is confirmed that all of the residential units will either meet or exceed the minimum nationally described space standards.

DESIGN PRINCIPLES AND MASTERPLANNING

Policy Context

6.111 Paragraph 124 of the NPPF identifies that the creation of high-quality buildings and places is fundamental to the planning and development process. Paragraph 127 sets out that developments should add to the overall quality of the area in the long-term, be sympathetic to local character and are visually attractive. They should also optimise the potential of the site to accommodate green and other public space.

6.112 Paragraph 128 states that design quality should be considered throughout the evolution and assessment of planning applications. Early discussions between applicants, the local planning

6.0 Planning Policy Assessment

authority and local community about the design of the emerging scheme are encouraged, and applications should demonstrate that proactive and effective engagement with the local community has been undertaken.

- 6.113 Adopted CS Policy SP1 ('Design of New Development and Conservation') seeks to ensure that new development is of high design quality, and responds appropriately to its setting and local area. The principles of sustainable development should be incorporated, including biodiversity enhancements. Heritage assets and their settings should also be protected and enhanced.
- 6.114 Adopted ADMP Policy EN1 ('Design Principles') sets out the criteria proposals must meet to ensure high quality design, including: appropriate scale, height, materials and coverage; layout and incorporation of natural site features; no unacceptable loss of buildings, open/green spaces; adequate access and parking; biodiversity and green infrastructure enhancement (including mitigation where necessary); and good permeability and connectivity through layout and design.
- 6.115 Emerging Policy EN1 ('Design Principles') requires that proposals exhibit high quality design and respond to the distinctive local character of the area. Proposals will be expected to follow a design process, which includes early engagement with the community and other relevant stakeholders. Clear design principles for the site should also be established.
- 6.116 As part of the emerging Local Plan, a Design Review Panel Supplementary Planning Document has been progressed. This requires developments of a certain scale, including residential developments of more than 50 new dwellings to meet with the Sevenoaks District Design Review Panel prior to the submission of an application.
- 6.117 The design guidance at Appendix 2 of the submission Local Plan for the draft Fort Halstead allocation requires that development on site should be of high quality design and careful layout, providing a buffer to protect the ancient woodland and priority habitats.

Policy Assessment

- 6.118 This application is a hybrid planning application, with the proposals for buildings Q13 and Q14 forming the detailed component, along with the details for the primary and secondary accesses, and the remainder in outline. As such, the detailed design for the majority of the site will be the remit of future Reserved Matters applications. However, through the Design and Access Statement (DAS) and Parameter Plans, the principles of high quality and appropriate design which are to be carried forward as part of future reserved matters have been established and secured.
- 6.119 The Parameter Plans submitted under this application comprise:
- **Demolition Plan:** identifies buildings to be demolished and retained on the site;
 - **Land Use and Green Infrastructure Plan:** establishes land use and green infrastructure zones in the site;
 - **Access and Movement Plan:** illustrates the two main access points to the site (Polhill and Star Hill) and identifies primary and secondary car, pedestrian and cycle routes throughout the site;
 - **Building Heights Plan:** considers the site's existing topography and establishes appropriate building heights across the site;
- 6.120 The Design and Access Statement sets out how the design of the development has evolved and shaped the parameters for future Reserved Matters applications. A key influence on the

6.0 Planning Policy Assessment

masterplan has been the level of engagement with stakeholders, including Planning and Design Officers at SDC (though the pre-application process), statutory consultees including KCC Highways, Historic England and the AONB Unit, the Design South East Design Review Panel and the three-day public consultation exercise. Each of these engagement exercises with key stakeholders explored the constraints and opportunities of the site to help to shape the vision for its redevelopment.

- 6.121 The vision for the site which was articulated as part of the previous extant planning permission remains relevant for this application and has been updated and considered in the context of the outcomes of the various stakeholder conversations. The vision for the site is set out below:
- Secure a viable, sustainable and vibrant long-term future for Fort Halstead that recognises its unique qualities and heritage;
 - Regenerate a major employment site providing a range of employment opportunities and create a new village community which complements the existing network of surrounding settlements;
 - Provide a range of high-quality new homes which respond to the District’s needs;
 - Ensure development is sensitive to its rural setting and will not have an adverse impact on the natural beauty, character and tranquillity of the Kent Downs AONB;
 - Achieve a balance of uses that will create a high-quality ‘place’ with its own identity, providing new homes, jobs, community facilities and open space to be enjoyed by the wider community.
- 6.122 As set out within the DAS, the site has been split into a number of distinct character areas. Each character area has its own chapter within the DAS which offers guidance on its key characteristics and presents illustrative plans and sections. Mandatory design principles for each character area are also provided and summarised in the Design Principles Document, which must be followed to ensure any development brought forward at Reserved Matters stage is of high quality.
- 6.123 These detailed design principles are more substantial than those set previously as part of the extant OPP, which were designed to establish a design framework but not a fixed design solution. Whilst there is still an element of flexibility, these mandatory design principles will help to control and secure the character, layout and built form for each character area as and when they come forward in the future. This will assist in ensuring that the phased development of the site remains cohesive and the quality is maintained over time. The establishment of detailed design principles has also been necessary to inform and justify the increased development density on the site, ensuring that this has been tested and can be accommodated without representing over-development of the site.
- 6.124 A separate Village Centre DAS has been prepared for the detailed component of the application (Q13 and Q14) and provides more detailed mandatory design principles for the development plots immediately adjacent (Plot 1A and 1B). The village centre forms the heart of the village, combining employment residential and community facilities. It also has an important function in bringing together and influencing the setting of the various heritage assets in this location, namely the Listed Penney building, Q14, and the Fort.

6.0 Planning Policy Assessment

HERITAGE AND THE HISTORIC ENVIRONMENT

Policy Context

- 6.125 Chapter 16 of the NPPF sets out the Government’s approach to conserving and enhancing the historic environment. In determining planning applications which impact heritage assets and their setting, under NPPF paragraph 192, planning authorities should consider the desirability of sustaining and enhancing the significance of heritage assets, continuing viable use (consistent with conservation), positive contribution (including economic viability), the desirability of the development to local character and distinctiveness. When considering the impact of the development on designated assets, weight should be given to the asset’s conservation.
- 6.126 Adopted CS Policy SP1 (‘Design of New Development and Conservation’) states that the District’s heritage assets and their settings, including listed buildings and ancient monuments will be protected and enhanced.
- 6.127 Adopted ADMP Policy EN4 (‘Heritage Assets’) details the criteria which proposals with effects on heritage assets and their settings will be assessed against:
- b. the historic and/or architectural significance of the asset;
 - c. the prominence of its location and setting; and
 - d. the historic and/or architectural significance of any elements to be lost or replaced.
- 6.128 In relation to archaeology, ADMP Policy EN4 also specifies that where an application is located within an area or suspected area of archaeological importance, an archaeological assessment must be provided to ensure that provision is made for the preservation of important archaeological remains/findings.
- 6.129 Draft Policy HEN2 (‘Heritage Assets’) reflects the adopted policy position, and considers that proposals that affect a designated or non-designated heritage asset or its setting will be permitted where the development sustains or enhances the heritage interest of the asset.
- 6.130 In relation to the site itself, both ADMP Policy EMP3 and the design guidance for the site’s draft allocation in the emerging Local Plan require that any redevelopment proposals respect and respond sensitively to the existing features within the site that are positive and make the site unique. In relation to the designated Scheduled Monument, this should be protected and enhanced.

Policy Assessment

- 6.131 There are a number of designated heritage assets on the site, namely the Fort which is a Scheduled Monument and includes a number of buildings within the Schedule and 3 buildings within the Fort which are specifically listed (one of which is Grade II and the other two are Grade II*). In addition outside of the Fort is the separate Grade II listed Penney Building (Q14).
- 6.132 In addition, there are a number of buildings and structures which are considered to merit consideration as non-designated heritage assets having been identified as such by SDC (2015), Heritage Collective (2015) and by CgMs.
- 6.133 The Built Heritage Statement and the Archaeological Desk based Assessment set out in detail the important historical development of Fort Halstead and the significance derived from its role in the defence of London in the late nineteenth century and strategic armaments research and development during the twentieth century. The Built Heritage

6.0 Planning Policy Assessment

Statement in accordance with National Planning Policy and in accordance with Historic England guidance, seeks to determine the significance of the potentially affected heritage assets, including the contribution made by their settings, and assess the potential impact of the proposed development upon that significance.

- 6.134 Through an extensive programme of consultation and subsequent masterplan evolution described in detail in the DAS, the masterplan and the detailed components of the application, including the listed Penney building, have sought to respond positively to and deliver beneficial enhancements to the retained heritage assets both designated and non-designated and their settings.
- 6.135 The Historic Buildings Statement concludes that on balance, the overall aggregate impact of development would be beneficial; providing a sustainable future for those elements of the site which make the highest contribution to built heritage significance whilst creating a new settlement which sensitively responds to the site's historic context.
- 6.136 The Archaeological Assessment has also considered in detail the location of the site, taking a broad view of the archaeological interest of the wider area, not just the proposed development area, and has also given consideration to where upstanding heritage assets within the site or study area may inform on archaeological potential.
- 6.137 Overall, the Assessment concludes that it is considered that the site has low potential for the presence of archaeological remains in areas of more intense development, other than those which might be directly related to the Fort. However there is the potential for yet unknown buried archaeological remains most likely ranging from the later prehistoric to post medieval period to survive within the site in areas that have not been the subject of intensive development. It is therefore recommended that a programme of monitoring is undertaken during intrusive ground works, which would be subject of a Written Scheme of Investigation to be agreed in advance with KCC.

TRANSPORT, ACCESSIBILITY AND PARKING

- 6.138 Set out under the sub-headings below are the key transport considerations for the redevelopment of Fort Halstead, and the response to the relevant adopted and emerging Development Plan policies and material considerations which are considered relevant.

Traffic Impact

Policy Context

- 6.139 Paragraph 111 of the NPPF requires that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Paragraph 109 considers that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 6.140 Adopted ADMP Policy T1 ('Mitigating Travel Impact') states that new developments will be required to mitigate any adverse travel impacts, including their impact on congestion and safety, environmental impact, such as noise and tranquillity, pollution and impact on amenity and health. This may mean ensuring adequate provision is made for integrated and improved transport infrastructure or other appropriate mitigation measures, through direct improvements and/or developer contributions.
- 6.141 Emerging Policy T1 ('Transport and Infrastructure') has a requirement for any adverse travel impacts created by new developments, including impacts on traffic congestion and safety,

6.0 Planning Policy Assessment

environmental and noise impact, air quality and impacts on amenity, health and wellbeing to be mitigated against. This mitigation may mean ensuring adequate provision is made for integrated and improved transport infrastructure (such as rail, bus and cycling) with other appropriate mitigation through direct improvements and/or developer contributions.

- 6.142 The design guidance for the emerging allocation reaffirms that any scheme will need to be supported by a Transport Assessment, setting out any required mitigation measures, safe access arrangements for all, and sustainable transport solutions. In terms of access, the design guidance specifies that multiple access requirements will be required to serve the development.

Policy Assessment

- 6.143 In accordance with national and local policies, this application is supported by a Transport Assessment, which includes a Framework Travel Plan.
- 6.144 The Transport Assessment (Volume III 10.1 of the Environmental Statement) assesses the core elements of the transport provision associated with the proposed development at Fort Halstead. It is based on the relevant legislation, policy and guidance, as well as extensive pre-application engagement with SDC and KCC Highways.
- 6.145 The site is located in a rural area, close to the villages of Knockholt Pound, Knockholt, Otford, Dunton Green and Halstead. The site has two existing accesses, one main access off Polhill (A224) (to the east) up Crow Drive (which is a private road) and a secondary access off Star Hill (to the west), which is open peak am and pm times only. The site is currently secure and as such, there is no unrestricted access or connection between the two accesses. A review of existing traffic confirms that the majority uses Polhill.
- 6.146 Traffic surveys were undertaken in 2017 and 2018 as part of the proposals in order to understand the current baseline conditions on the transport network. These supplement the survey work undertaken in 2014 in support of the 2015 outline planning application. There are no major highway capacity issues on the immediate network serving the site. Some minor queuing was observed some distance from the site at the Hewitts roundabout to the A224, and the A224/Pilgrim's Way junction. There are no identified accident clusters causing the need to provide safety improvements off-site as part of the development. The proposals will therefore not have a severe impact on the highways network.
- 6.147 At the site accesses, the previous mitigation secured through the 2015 OPP will be taken forward, which includes a roundabout at Otford Lane/A224 junction (leading to the Polhill access) as this has optimised pedestrian and cycle safety.
- 6.148 The 2015 OPP included a planning condition which was added by members at the Development Management Committee determining the application and was not recommended or required by KCC or SDC officers, to restrict the use of the Star Hill Access to emergency vehicles and cycle/pedestrian/horses only. Through the development of the current proposals, it is clear that KCC and SDC require the site to be served by two vehicular accesses and that design measures should be undertaken to minimise the use of the Star Hill access by vehicles. This has been a key underpinning element of the masterplan evolution. The Character Area Guidance for Crow Road/Crow Drive and the main route has been developed alongside KCC officers, in seeking to achieve a scheme to reduce speeds to 20mph throughout the site, and specifically, to deter significant volumes of traffic using the Star Hill access, through design features, changing the road alignment, locating the majority of commercial development at the Crow Drive access and pedestrianising the central section of Crow Drive to create a more circuitous route for traffic using Star Hill.

6.0 Planning Policy Assessment

- 6.149 Furthermore, the Transport Assessment demonstrates that the inclusion of the Star Hill access results in lower overall flows compared to the OPP restriction, even though this was for a lesser quantum of development, due to an appropriate distribution of development.
- 6.150 As well as the design measures set out above for the Star Hill access use reduction, a number of additional safety features have been identified:
- Speed reduction on Star Hill Road from 60mph to 40mph (discussed further below);
 - Visibility splays are to be provided at the access, enhanced in comparison to the OPP (a plan showing these is at Appendix H of the Transport Assessment);
 - New warning signs on the northern and southern approaches to the access (a plan showing these is at Appendix H of the Transport Assessment);
 - Anti-skid surfacing on Star Hill Road;
 - Tapers on the junction corner;
 - An enlarged splitter island to separate inbound and outbound movements;
 - Trimming of foliage and trees to improve visibility;
 - Restriction could be placed internally through Travel Plans, to prevent types of commercial vehicles from using Star Hill.
- 6.151 The proposed speed restriction on Star Hill would need to be supported by KCC. At this stage, KCC has not committed to supporting this, based on recorded speeds and collision data, however, a note has been provided at Appendix O of the Transport Assessment to set out the justification for this, and agreement will be sought to secure this as part of the S106 should KCC be accepting of the principle.
- 6.152 Therefore, the proposed development has been shown to have minimal impact on the surrounding network, and sufficiently mitigates impacts and proposes enhancements at the site accesses, and a range of internal place-making measures to minimise the impact of the Star Hill access.

Public Transport, Sustainable Modes of Movement and Connectivity

Policy Context

- 6.153 Paragraph 108 of the NPPF considers that proposals should ensure appropriate opportunities to promote sustainable modes of transport can be, or have been, taken up given the type of development and its location. Paragraph 110 further requires that applications give first priority to pedestrian and cycle movements, and secondly facilitate access to high quality public transport.
- 6.154 Submission Local Plan supporting paragraph 5.2.13 notes that the dispersed rural nature of the District leads to bus operators finding it difficult to run commercially viable bus services, resulting in many being subsidised by KCC. It suggests that limited development in rural areas is unlikely to provide a catalyst for improved bus services and therefore innovative public and community transport solutions are necessary, including dial-a-ride and car-pooling.
- 6.155 Emerging Local Plan Policy T1 emphasises the importance of promoting and integrating safe and convenient pedestrian and cycle routes, including within the Public Rights of Way (PROW) network.

6.0 Planning Policy Assessment

Policy Assessment

- 6.156 The site is located in a predominantly rural area, as part of the network of local villages, albeit only 5km to the north west of Sevenoaks, and 7.5km south east of Orpington. There is currently a private bus operated which provides a peak service between the site and Knockholt and Orpington stations. The 431 bus (operated by GoCoach) runs from Orpington to Sevenoaks via Star Hill Road and Knockholt Station (3-4 times daily, Mon-Fri). Figure 2-9 of the Transport Assessment shows the bus routes in the vicinity of the site.
- 6.157 As part of the pre-application workstreams, GoCoach have been approached with regard to diverting the service through the site to introduce a public bus service. GoCoach would be willing to do so, given the population arising from the proposed development. This is supported by KCC Public Transport Team.
- 6.158 In addition to this, a community bus is also proposed, consisting of two minibuses to provide links to local railway stations for commuters, and on-demand service during the day. Prior to the delivery of the primary school on site, it can also provide a service to local primary schools. Indicative timetables are provided in Appendix M to the Transport Assessment. The Framework Travel Plan establishes the principle of the bus, its routes and it will be secured through the S106 for a length of time to be agreed with KCC. The bus service is designed to be flexible at this stage, to allow it to respond to the changing needs of the development.
- 6.159 Pedestrian and cycle access to the site is relatively poor, however there are a number of footpath links and rights of way in the vicinity of the site, which offer the potential to provide linkages in to recreational and commuter routes within the site. The DAS includes a plan of potential recreational routes within the site and the link to the existing PROW. The Access and Movement Parameter Plan also demonstrates and secures these connections. This demonstrates compliance with emerging Policy T1.
- 6.160 The Travel Plan (which is noted as a requirement for large sites at Appendix 2 of the Submission Local Plan Design Guidance) will establish key principles and set modal shift targets, to help discourage use of the private car. Ultimately, the site has been designed with the aim of enhancing the sustainability of the location, through providing a mixed-use development (with employment development, local services and community space and a primary school located on site within walking distance) and minimising the need to make journeys off-site for essential services; linking into the existing bus network and providing an enhanced site-specific demand driven bus service; and linking into the existing network of footpaths and cycle paths and providing enhancements to these.
- 6.161 Therefore, it is considered that the proposals comply with the sustainable transport aims as established by relevant local and national planning policy.

Car and Cycle Parking

Policy Context

- 6.162 Paragraph 105 of the NPPF relates to car parking standards, although it does not prescribe what these should be. Rather, it sets out the considerations that should be taken into account by local planning authorities when setting standards, such as accessibility, public transport opportunities and the type, mix and use of the development.
- 6.163 Both adopted ADMP Policy T2 ('Vehicle Parking') and emerging Local Plan Policy T1 require vehicle and cycle parking provision in new residential developments to be in accordance with the current KCC vehicle parking standards contained in Interim Guidance Note 3 to the Kent Design Guide (or any subsequent replacement). However, both policies do also contain a

6.0 Planning Policy Assessment

degree of flexibility and allow for a departure from the maximum and minimum standards in order to take account of specific local circumstances that may require a higher or lower level of parking provision, including as a result of the development site's accessibility to public transport, shops and services, highway safety concerns and local on-street parking problems.

- 6.164 In relation to electric vehicle charging points (EVCP), adopted Policy T3 ('Provision of Electrical Vehicle Charging Points') and emerging Policy T1 require that all new developments must have sufficient infrastructure to provide additional charging points to meet future demand. Paragraph 110, part d) of the NPPF also confirms the need for developments to be designed to enable the charging of ultra-low emission vehicles in safe, accessible and convenient locations.
- 6.165 In relation to non-residential development which includes car parking, there must be provision for EVCP points for use by employees or customers, with the number of points to be provided at the discretion of the SDC, taking into account the:
- The size and type of the new development;
 - The number of expected employees, customers or car parking spaces;
 - The accessibility of the location;
 - The expected length of stay.
- 6.166 In terms of the ECVP provision to serve residential development, emerging Policy T1 requires that all new houses with a garage or off-street parking must include an external socket for the charging of electric vehicles. Residential developments which comprise new apartments or houses with separate parking areas must include a scheme for communal charging points. The number of points to be provided will be determined by the number of housing units to ensure charging points are readily available.

Policy Assessment

- 6.167 The level of on-site vehicular and cycle parking for the proposed development will be established and provided in accordance with the latest relevant policy and guidance at the point in time the specific reserved matters application comes forward.
- 6.168 ECVP provision will be installed in accordance with the latest technology, and agreed through reserved matters applications.

TREES AND BIODIVERSITY

Policy Context

- 6.169 Paragraph 175 of the NPPF requires that development resulting in the loss or deterioration of irreplaceable habitats, such as ancient woodland, should be refused.
- 6.170 Adopted ADMP Policy EN5 ('Landscape') primarily concerns landscape within the Kent Downs AONB. With regard to landscape, the policy awards the AONB the highest level of protection, and requires that proposals should conserve and enhance the character of the landscape.
- 6.171 Emerging Policy LA1 ('Landscape and Areas of Outstanding Natural Beauty') continues to offer the highest level of protection to the AONB.
- 6.172 The Kent Downs AONB Management Plan notes that woodland is a key feature of the Kent Downs and frames the upper slopes and plateaux tops.

6.0 Planning Policy Assessment

Policy Assessment

- 6.173 A significant quantum of the woodland on site is designated ancient woodland, which forms a significant feature of the landscape character. The proposals have been developed with this as a key consideration, and preserves all ancient woodland, in accordance with NPPF paragraph 175.
- 6.174 Natural England guidance states that a buffer of 15m between ancient woodland and development is advised. Therefore, there will be a buffer of at least 15m between development and the ancient woodland boundary. This is fixed by the Green Infrastructure Parameter Plan. Within this buffer, natural features including swales, SUDS and natural footpaths may be incorporated where appropriate. The ancient woodland has not been actively managed to date, therefore, a key aim of the Framework Ecological Management Strategy 'FEMS') (Volume III 9.12 of the Environmental Statement) is enrich the woodland and ensure its longevity.
- 6.175 As well as the ancient woodland boundary, there is a site wide TPO. Accordingly, a Tree Survey was undertaken to inform the development of the proposals in accordance with planning policy. This identified the quality and quantity of the trees on site, which informed the layout of the proposals in accordance with recommendations regarding the retention and protection of trees and groups of trees worth of retention. The majority of trees, beyond the ancient woodland, which have been identified as being of moderate or high quality/value are to be retained and are integrated into the development proposals. The ancient woodland will be retained and enhanced in its entirety.
- 6.176 Measures are also proposed to consider the protection of trees and their root protection areas during site preparation, construction of the development and below ground infrastructure, in accordance with the relevant British Standards. These will be secured by planning condition and maintained throughout construction of the relevant areas.
- 6.177 An ecological desk study was undertaken to determine the presence of designated areas and protected species in proximity to the site. no statutory nature conservation sites within the search areas. However, the survey area does fall within the following zones:
- Several SSSI Impact Risk Zones for Sevenoaks Gravel Pits SSSI (2.1km to the south east of the site);
 - Westerham Mines SSSI (6.55km to the south west);
 - Ancient woodland within and surrounding the search area;
 - The following Local Wildlife Sites:
 - Chevening Estate;
 - Woodlands West of Shoreham;
 - Chevening Churchyard;
 - Woods and Pasture at Pratt's Bottom.
 - The following Kent Wildlife Trust Reserves:
 - Polhill Bank;
 - Crown Meadow Wood.

6.0 Planning Policy Assessment

- 6.178 A Phase 1 walkover survey was undertaken in 2018, and recorded the habitats and notable species present on site. The following assessments were undertaken as part of the evidence to inform the development proposals:
- Preliminary Bat Roost Assessment;
 - Nocturnal Emergence and Dawn Re-entry Bat Surveys;
 - Bat Activity Surveys;
 - Badger Survey;
 - Breeding Bird Survey;
 - Botanical Survey;
 - Terrestrial Invertebrate Survey;
 - Reptile Survey;
 - Dormouse Survey;
 - Pre-development Arboricultural Survey; and,
 - Arboricultural Impact Assessment.
- 6.179 The full results of these surveys are appended to the Environmental Statement at Volume III 9.1-9.11.
- 6.180 In terms of impact, the development has been designed to fall predominantly within the existing built footprint, thus maintaining the most important habitats as identified on site. There will be some loss of scattered trees, however, the significant tree clusters, perimeter woodland and ancient woodland will be retained and enhanced. During construction there is the potential for these areas to be disturbed or damaged, however, mitigation will be secured (see below).
- 6.181 The Preliminary Ecological Appraisal and Framework Ecological Management Strategy ('FEMS') set out the initial recommendations, in line with the NPPF and PGG hierarchy principles of 'avoidance, mitigation, compensation.'
- 6.182 A Landscape and Ecological Management Plan ('LEMP') will be provided for each phase of the development to provide details for the ongoing management and maintenance of the retained and created habitats, to increase and maximise biodiversity value in the long term. A Construction Environmental Management Plan ('CEMP') will be produced for each phase to manage the construction impacts. The measures to be secured [inter alia] are summarised below:
- General site-wide management principles and subsequent monitoring of habitat types to allow the refinement of management regimes;
 - Ancient Woodland:
 - Construction Ecological Management Plan to be implemented to minimise the potential impact of construction;
 - Minimum 15m buffer from construction zone;
 - Use of protective fencing and control of pollutants;
 - Minimisation of pedestrian access to sensitive areas of valuable woodland;
 - Management of SuDS.

6.0 Planning Policy Assessment

- Habitat retention:
 - Protective measures through the above Management Plan.
- Habitat loss and enhancements:
 - Provision of wildlife area to south west of site beyond the application boundary, to enhance existing species-rich calcareous grassland, introduce new tree planting, include ponds and sustainable drainage for aquatic habitat, create green corridors.
 - Planting of native and nectar-rich special/species attractive to night flying insects for foraging bats.
 - Nesting/roosting habitats to be provided;
 - Hibernation habitats;
 - Good horticultural practices in site wide management – including discouraging the use of pesticides;
- Trees/hedgerows:
 - Where identified for retention, protection in accordance with the relevant British Standards;
 - Minimisation of pedestrian access to sensitive areas of valuable woodland and grassland;
- Protected Species:
 - Bats:
 - Further surveys will be undertaken in those buildings identified as supporting bat roosts/where roosts have already been identified. Natural England Bat Licence Applications will be thereafter be applied for, including a thorough application process and further surveys as well as a method statement for maintaining the bat population.
 - The same approach will broadly be taken in respect to tree roosts.
 - Limiting night works during construction phases;
 - Operational lighting strategy;
 - Protection of retained habitats;
 - Provision of bat roosting boxes and bat house on site.
 - Badgers:
 - Existing setts to be retained
 - Appropriate measures to be put in place to ensure foraging area is maintained
 - Dormice:
 - Retention of majority of suitable habitat (i.e. woodland);
 - Protection of retained habitat during construction;
 - Installation of dormice nest boxes within the woodland;
 - Provision of ‘wild areas’ in the vicinity of residential parcels to attract domestic pets and dissuade their use of the important habitats on the site;

6.0 Planning Policy Assessment

- Birds:
 - Protection of retained habitat (i.e. trees, woodland);
 - Appropriate timing of works in sensitive areas, or checking of areas by ecologist prior to intrusive/destructive works;
 - Provision of bird boxes (specification and quantity detailed in the FEMS) and maintenance checks annually;
 - Reptiles:
 - Within the site, populations of slow-worm and common lizard were identified, with grass snakes and an adder located historically outside of the application boundary;
 - In areas of proposed clearance, initial management of woody vegetation (trees, hedgerow) and longer grass, consisting of cutting to a height of 0.1 m – 0.2 m;
 - Site walkover and survey for any sensitive features and translocation strategy (to receptor site) if required;
 - Management of tree/hedgerow removal and construction areas to ensure that no attractive habitats for reptiles are created;
 - Provision of hibernacula.
- 6.183 Invasive non-native species will also be controlled through management, removal and hand pulling of species where required.
- 6.184 These measures will be secured via a LEMP for each phase, in accordance with the principles established in the FEMS.

GREEN INFRASTRUCTURE, OPEN SPACE AND RECREATION

Policy Context

- 6.185 Adopted CS Policies SP10 and SP11 concern Green Infrastructure, Open Space, Sport and Recreation Provision and Biodiversity (respectively). New development is expected to provide open space, including amenity space, parks and formal gardens, natural and semi-natural open space, children’s play areas, sports facilities, churchyards and allotments.
- 6.186 Adopted ADMP Policy G1 (‘Green Infrastructure and New Development’) encourages proposals to fully consider opportunities for provision of additional Green Infrastructure (where justified by the character of the area or the need for open space). Specifically, it encourages open spaces provided as part of new development to be located where they can provide a safe link for the population and connectivity for biodiversity with the existing features of the Green Infrastructure Network. The policy also notes that additional green infrastructure and habitat restoration and/or re-creation, should be provided in accordance with the appropriate guidance contained in the Kent Design Guide and the Countryside Assessment SPD, and should take account of the guidance within the AONB Management Plans and associated guidance where appropriate.
- 6.187 Emerging Local Plan Policy OS1 (‘Open Space, Sport and Leisure’) requires that open space should be incorporated into new development from the earliest design stage, alongside blue green infrastructure and biodiversity features. In relation to the Public Rights of Way Network

6.0 Planning Policy Assessment

(PRoW), improvements to the quality of this will be supported, and connections to the existing PRoW network should be incorporated into all new developments.

- 6.188 In relation to the provision of play areas, Policy OS1 requires that for developments of 500+ dwellings a Local Area for Play (LAP), Locally Equipped Play Area (LEAP) and a Neighbourhood Equipped Play Area (NEAP) all need to be provided.

Policy Assessment

- 6.189 The development proposals have been developed with a landscape, green infrastructure and play space strategy being fully integrated into the proposals. The site benefits from a considerable existing natural green asset, and careful consideration has been given to the protection and enhancement of this asset, with particular attention given to the protection of sensitive areas such as the ancient woodlands and the chalk grassland, encouraging the use of the less sensitive natural green amenity areas within the site and creating green corridors through the development. Key linkages and improvements to the wider network for footpath and bridleways has also formed a key component of the proposals. The DAS describes in detail how the appearance and character of the site will be enhanced by a comprehensive Green Infrastructure strategy, which has fundamentally informed the built development within the masterplan.
- 6.190 The Socio-Economic Assessment outlines that there is a good range of managed and natural green space and recreation areas within 2 miles driving distance of the site and a good range of indoor and outdoor sports and leisure facilities in the wider Sevenoaks area. The DAS outlines how the creation of a playful environment is a key strand of the green infrastructure strategy. Three types of play space is proposed at Fort Halstead, Local Area for Play (LAP), Local Equipped Area for Play (LEAP) and a Multi-Use Games Area (MUGA). Play areas will be evenly distributed across the site providing easy access for residents. In addition, the provision for recreational play in the form of an informal kick about area is proposed on the grassland to the west of the new village. Furthermore, the DAS outlines a range of walking, jogging and cycling routes which will be provided and enhanced to enable an active lifestyle for both residents and employees at site. The proposals therefore accord with the adopted and emerging policies.

FLOOD RISK AND DRAINAGE

- 6.191 Paragraph 155 of the NPPF requires that inappropriate development in areas at high risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).
- 6.192 There is no local adopted policy in relation to flooding, however emerging Policy CC1 ('Climate Change, Flooding and Water Management') sets out that residential development must avoid areas at risk of flooding. It further requires that development on sites larger than 1ha in Flood Zone 1 must be subject to a Flood Risk Assessment. The Assessment should include the requirement for any mitigation measures and where relevant, the assessment should also address the risk of flooding from surface water, groundwater and ordinary watercourses.
- 6.193 In relation to sustainable drainage, draft Policy CC1 requires that any drainage scheme must manage all sources of surface water, including exceedance flows and surface flows from off-site, and ensure adequate drainage connectivity. It is not acceptable for surface water run-off to enter the foul water system. The draft policy further sets out measures that Sustainable Drainage Systems (SuDS) should incorporate, and requires that the design, phasing and long

6.0 Planning Policy Assessment

term management and maintenance of SuDS will be required prior to the development commencing.

Policy Assessment

- 6.194 The site is located within Flood Zone 1, meaning there is less than 0.1% annual risk of flooding from fluvial or tidal sources, and as such residential use is appropriate in this area.
- 6.195 A Flood Risk Assessment & Drainage Strategy have been undertaken. The proposed development is concluded to meet the requirements of the Sequential and Exception Tests. Finished floor levels will be set a minimum 150mm above adjacent infrastructure thoroughfare levels, and the proposed highway and building layout will be designed to accommodate any design exceedance overland flows through the site. Such measures are intended to afford the site additional protection from potential 'residual' flood risks.
- 6.196 Safe access and egress has also been demonstrated to and from the site, as well as the fact that the proposed scheme will not result in a loss of floodplain storage or redirect any surface water overland flows onto adjacent land / properties.
- 6.197 A Surface Water Drainage Strategy has been presented which advocates the use of sustainable drainage systems (SuDS). The use of borehole soakaways linked to attenuation basins will reduce the volume of surface water run-off to accommodate the 1 in 100-year (plus 40% climate change) event. A network of sewers and manholes leading to the attenuation basins will be designed to contain a 1 in 30-year event. Foul drainage will be pumped to the public network on Polhill. As such, the proposals accord with the emerging policy.

ENERGY AND SUSTAINABILITY

Policy Context

- 6.198 Paragraph 150 of the NPPF expresses a requirement for new development to help reduce greenhouse gas emissions through its location, orientation and design.
- 6.199 Adopted CS Policy SP2 ('Sustainable Development') supports the use of sustainable design and construction, towards the aim of zero carbon development. A number of aspirational criteria are outlined in the policy, including: BREEAM, SuDS, 10% carbon reduction, and decentralised and alternative energy sources.
- 6.200 Draft Policy CC1 ('Climate Change, Flooding and Water Management') sets out that best practice in relation to sustainable design and construction will be promoted to improve the energy and water efficiency of all new development. Climate change mitigation and adaptation measures are listed, which include utilising renewable and low carbon technologies and decentralised heating and energy where appropriate. In relation to non-residential development, all proposals, including conversions, must achieve BREEAM 'Excellent'.

Policy Assessment

- 6.201 A Sustainability and Energy Strategy have been prepared to accompany the application. The unique opportunity that Fort Halstead has in relation to sustainability and influencing the character and living conditions of the area is recognised. An overarching sustainability framework is proposed which will be controlled by a collective consisting of the Fort Halstead client team, appointed architect and appointed engineer. It will act as an influencer, facilitator and collaborator for embedding sustainability principles in all components of the development. The Framework will provide a robust platform to drive innovation and a

6.0 Planning Policy Assessment

forward-looking approach to sustainability throughout all reserved matter applications of Fort Halstead.

- 6.202 The Framework will consist of Key Performance Indicators (KPIs) for the design, construction, operational and maintenance phases of development to ensure sustainability is considered at the earliest possible stages and maximise the development's benefit to sustainability. The KPIs will comprise design processes covering key themes including: Energy; Health and Well Being; Sustainable Construction and Procurement Strategies; Operational Management Strategies; Water and Waste.
- 6.203 In terms of the Energy Strategy, an initial appraisal of the development has been undertaken to establish the potential for low or zero carbon technologies (LZC) for the scheme. This appraisal is to provide direction regarding the most applicable and viable low/zero carbon energy solutions for consideration within the scheme. A decentralised energy network is not proposed for the development, there are no existing networks in close proximity and under an updated Building Regulations scenario a gas fired C/CHP system will likely become more carbon intensive and operationally it may be costlier to run compared to alternative fuel sources.
- 6.204 Based on a preliminary appraisal, an air source heat pump system and a solar PV array will be considered for the development. The energy strategy proposes to include a commitment within the Fort Halstead Sustainability Framework to investigate the 10% reduction in total carbon emissions through on-site energy generation at future reserved matter applications. By doing so, the framework is being mindful of the heritage constraints for the detailed elements of the application and ensuring flexibility within the wider masterplan. Allowing future reserved matters applications to embed best practice design measures and comply with the latest national and local Sevenoaks planning policy that is in place at the time the reserved matters application is submitted.

AIR QUALITY

Policy Context

- 6.205 Paragraph 181 of the NPPF requires that development decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.
- 6.206 Policy SP2 ('Sustainable Development') of the adopted CS states that the design and location of new development will take account of the need to improve air quality in accordance with the District's Air Quality Action Plan. Development in areas of poor air quality will be required to incorporate mitigation measures to reduce impact to an acceptable level.
- 6.207 Emerging Policy HE1 ('Health, Wellbeing and Air Quality') reflects the adopted policy position as set out above.

Policy Assessment

- 6.208 An Air Quality Assessment of changes in local air quality during the construction and operational phases was undertaken.
- 6.209 The main likely effects on local air quality during construction relates to dust. A range of measures to minimise or prevent dust generated from construction activities would be

6.0 Planning Policy Assessment

implemented throughout the works. Therefore, it is considered that likely residual effects due to dust emissions would be not significant.

- 6.210 Air quality concentrations for NO₂ and particulates at the Site are below the Air Quality Strategy Objectives for the protection of health. Therefore, the effect of introducing sensitive receptors (residential/school) to the Site is not significant.

NOISE

Policy Context

- 6.211 Paragraph 180 of the NPPF requires that new development should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development, and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 6.212 Adopted ADMP Policy EN7 ('Noise Pollution') states that proposals will be permitted where development would not have an unacceptable impact when considered against the indoor and outdoor acoustic environment of surrounding occupiers or occupiers of any future units within the scheme, and would not result in unacceptable noise levels from existing noise sources that cannot be adequately mitigated. It states that where proposals for high noise generating development would affect AONBs or open countryside or sites designated for their biodiversity value, development will not be permitted if it would undermine the character or harm the biodiversity of these areas.
- 6.213 Adopted ADMP Policy EN2 ('Amenity Protection') states that proposals will be permitted where they would provide adequate residential amenities for existing and future occupiers of the development and would safeguard the amenities of existing and future occupants of nearby properties by ensuring that development does not result in excessive noise, vibration, odour, air pollution, activity or vehicle movements, overlooking or visual intrusion and where the built form would not result in an unacceptable loss of privacy, or light enjoyed by the occupiers of nearby properties.
- 6.214 Emerging Policy EN1 ('Design Principles') sets out that proposals which meet the following criteria will be permitted:
- Development would not have an unacceptable impact when considered against the indoor and outdoor acoustic environment including existing and future occupiers of the development and the amenities of existing and future occupants of nearby properties; and
 - Developments would not result in unacceptable noise levels from existing noise sources that cannot be adequately mitigated.

Policy Assessment

- 6.215 An assessment of the noise and impacts from nearby noise sources, and impacts arising from the development including from construction and operational noise, which has been undertaken in accordance with the relevant legislation, guidance and policy.
- 6.216 A baseline noise survey was undertaken between 29 November and 4 December 2018. The survey included three long term and six short term noise monitoring positions, similar in position to a previous noise survey undertaken as part of the previous outline planning application.
- 6.217 The noise survey and assessment methodologies have been undertaken in accordance with the Scoping Report, Scoping Opinion, consultation with the EHO at SDC and current

6.0 Planning Policy Assessment

guidance provided by SDC. The assessment identifies that noise impacts at existing and proposed sensitive receptors will be negligible during the operational phase of the development, providing appropriate mitigation measures are implemented

CONTAMINATION

- 6.218 There are no Development Plan policies relating to contaminated land and remediation, this is dealt with in the NPPF.
- 6.219 Paragraph 178 of the NPPF states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination, and proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation). Adequate site investigation information should also be provided as part of any applications.
- 6.220 Paragraph 179 goes onto state that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

Policy Assessment

- 6.221 The Site, due to its historical uses, does have localised ground contamination. This is due to the various testing, and general industrial activities undertaken at the site in previous years. A number of investigations have been undertaken over the years, and these are considered in Volume III 13.1 and 3.2. These reports represent a robust baseline assessment and outline remediation strategy. However, owing to the secure nature of the Site, it has not been possible to fully assess the current ground contamination. Therefore, the remediation strategy has been submitted in outline, reflecting the existing available information and proposes the measures to be undertaken so as to inform the detailed final implemented remediation strategies for the relevant plots that are found to require remediation following the demolition of buildings as part of Phase 1.
- 6.222 The proposed remediation strategy will ensure that contamination issues are addressed and dealt with appropriately throughout the development. Planning conditions will be used in the normal way to control matters of detail relating to the remediation strategy, remediation method statement and verification report, and to cover any further more detailed investigations which are identified as necessary through the later stages of the process. This approach complies with the requirements of the NPPF.

DRAFT HEADS OF TERMS

- 6.223 Draft S106 Heads of Terms have been discussed with SDC and KCC throughout the evolution of the proposals, and include the following items:
- Affordable Housing, including a Community Lettings Policy Agreement;
 - Employment land marketing;
 - Education review in accordance with the delivery of a one form entry primary school;
 - Green Infrastructure/Open Space/Public Realm;
 - Community Services;
 - Highways.

7.0 Summary and Conclusions

- 7.1 This Planning Statement has been prepared to support a planning application for a new mixed use village community, delivering much need employment and housing on this major previously developed site.
- 7.2 The proposals have been considered against the adopted Development Plan, and relevant material considerations including the National Planning Policy Framework.
- 7.3 The proposals will deliver the following vision for the site:
- Secure a viable, sustainable and vibrant long-term future for Fort Halstead that recognises its unique qualities and heritage;
 - Regenerate a major employment site providing a range of employment opportunities and create a new village community which complements the existing network of surrounding settlements;
 - Provide a range of high-quality new homes which respond to the District’s needs;
 - Ensure development is sensitive to its rural setting and will not have an adverse impact on the natural beauty, character and tranquillity of the Kent Downs AONB;
 - Achieve a balance of uses that will create a high-quality ‘place’ with its own identity, providing new homes, jobs, community facilities and open space to be enjoyed by the wider community.
- 7.4 In recognition of the sensitive landscape in which it sits, AONB, its importance in terms of historical association including the range of designated and non-designated heritage assets on site, it is considered that the proposed development will deliver a number of key benefits to the site and the District:
- A new employment vision for the future of Fort Halstead delivering employment opportunities and contributing to local economic growth. Providing a range of high quality employment opportunities across B1a/b/c Use Classes through the creation of a business, education and innovation hub.
 - Retention of QinetiQ as a key employer in a new secure R&D enclave.
 - Delivering employment floorspace early in the development, c.4,000 sqm GEA business floorspace will be available for occupation before the build out of any residential plots, as well as serviced employment plots ready for development, reinforcing the development as an employment led scheme;
 - Regeneration of a major previously developed site including the fundamental and comprehensive upgrade of site infrastructure to make the site fit for development, supporting its future as a modern employment and residential village, including significant upgrades to the energy and water networks;
 - Delivering a significant contribution towards SDC’s housing land supply including delivery of much needed affordable housing to contribute to meeting SDC’s identified local affordable housing need;
 - Improved biodiversity, landscaping and amenity space – the proposals provide a comprehensive ecological management and landscaping scheme and recreational network, making a positive contribution to the achievement of aims and objectives of the Kent Downs AONB Management Plan and conserve and enhance the natural beauty and tranquillity of the Kent Downs Area of Outstanding Natural Beauty;

7.0 Summary and Conclusions

- Celebrating the Site’s heritage through the retention and preservation of the Fort and Listed Buildings, and creation of a Historic Interpretation Centre. Providing new viable uses for both designated and non-designated assets retained and knitting them into the heart of the new village;
- Creation of a new, balanced and sustainable community, integrating the existing residential community along Crow Drive;
- Delivery of a high quality, sustainable design established through Character Area Design Principles;
- Providing enhanced opportunities for travel by sustainable transport through provision of a Community Bus, upgrades to the existing 431 bus service, and facilitating upgrades to local public rights of way through a S106 Agreement; and
- Provision of land and the planning framework (established through this planning permission) for a one form-entry primary school, to be delivered by KCC.

APPENDICES

A. EIA Scoping Opinion from SDC

CBRE Ltd
by email

Tel No: 01732 227000
Ask for: North Team
Email: DC.North@sevenoaks.gov.uk
My Ref: PA/18/00488
Your Ref:
Date: 05.04.2019

Dear Ms Goldie ,

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Scoping opinion for an Environmental Impact Assessment for the redevelopment of Fort Halstead including: Mixed-use development comprising a business area (Use Classes B1 and ancillary B8) of up to 3.7ha, retention of QinetiQ (Use Classes B1 and ancillary B8), up to 750 residential units, a village centre (Use Classes A1-A3, B1a, C3, D1 and D2), use of the Fort area and bunkers as an historic interpretation centre (Use Class D1) with ancillary workshop space, and works associated with the development.

I refer to your report titled “EIA Scoping Report” dated November 2018 which seeks this Council’s comments in respect of the above development. The submission has been made under Regulation 15, paragraph 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as amended. This allows a person who is minded to make an EIA application to ask the relevant planning authority to state their opinion as to the scope and level of detail of the information provided in the Environmental Statement.

The Council agree with the applicant that the proposal falls within Schedule 2 of the 2017 EIA Regulations and that, due to the scale of the development and in view of the potential for significant environmental impacts, an Environmental Statement will be required.

I can confirm that, in issuing this scoping opinion, the authority has consulted the relevant consultation bodies and this response incorporates those responses received.

Description of Development

The document contains a description of the proposed development for the benefit of the scoping request from paragraph 2.12. In summary this includes:

- Business area (comprising use class B1 and ancillary B8) of up to 3.7ha;

Chief Executive: Dr. Pav Ramewal
Council Offices, Argyle Road, Sevenoaks, Kent TN13 1HG
Telephone: 01732 227000 DX 30006 Sevenoaks
Email: information@sevenoaks.gov.uk
www.sevenoaks.gov.uk

- Area for retention of QinetiQ (use class B1 and ancillary B8);
- Up to 750 residential units;
- A village centre (comprising use classes A1-A3, B1a, C3, D1 and D2);
- Use of the Fort area and bunkers as an historic interpretation centre (use class D1) with ancillary workshop space;
- Associated works including roads (with access points at Otford Lane/ Crow Drive and Star Hill), landscaping, security fencing, formal and informal open space, pedestrian, cyclist and public transport infrastructure, utilities infrastructure, sustainable urban drainage system, cycle and car parking.

Policy Background and Guidance

The Environmental Statement should have regard for adopted and published policy and guidance including, but not limited to the following:

- National Planning Policy Framework
- Planning Policy Guidance
- Sevenoaks Core Strategy
- Sevenoaks Allocation and Development Management Plan
- Sevenoaks Draft Local Plan
- Sevenoaks Green Belt SPD
- Sevenoaks Affordable Housing SPD
- Sevenoaks Draft Affordable Housing SPD
- Sevenoaks Draft Development in the Green Belt SPD
- Sevenoaks Landscape Character Assessment, January 2017
- Kent Design Guide
- KCC Parking Standards 2006
- Kent Downs AONB Management Plan
- Kent Downs Landscape Design Handbook
- Kent Downs Renewable Energy Position Statement
- Model Procedures for the Management of Land Contamination (CLR11)
- BS 10175 2001 Investigation of Potentially Contaminated Sites- Code of Practice
- The UK Forestry Standard (UKFS) (4th edition published 2017)
- The Clean Growth Strategy (2017)
- Department for Transport Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development (September 2013)
- Planning for the Future- A guide to working with Highways England on planning matters (September 2015)
- BS 42020:2013 Biodiversity
- Lead Local Flood Authority (KCC) document Drainage and Planning Policy Statement
- BS 8233:2014 Guidance on sound insulation and noise reduction for buildings
- BS 4142:2014 Noise assessments
- BS 5228:2009+A1:2014 Code of practice for noise and vibration

Biodiversity and Geology

The site is located within a designated Biodiversity Opportunity Area.

KCC Ecology team have advised that they are satisfied with the range of ecological surveys which have been carried out and which are in the process of being carried out. The results of those surveys, details of the proposed mitigation, site plan demonstrating the mitigation can be implemented and a site wide management plan should be submitted with the planning application.

The design of the proposed development must take in to account the results of the ecological surveys to retain the areas of ecological interest and ensure connectivity throughout the site is maintained. This approach encapsulates the ‘mitigation hierarchy’ described in British Standard BS 42020:2013, which involves the following step-wise process:

- Avoidance- avoiding adverse effects through good design;
- Mitigation- where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
- Compensation- where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm;
- Enhancement- planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

The measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development.

There are areas of ancient woodland within the proposed development site and the applicants 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”*.

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. A suitable compensation strategy must be submitted to enable full consideration of the impact of the development on ancient woodland under the NPPF.

It is noted that for the previous application national vegetation classification surveys were carried out within the woodlands - it is likely that the results of these surveys are still valid but this point must be discussed within the submitted ecological reports. If the information is insufficient there may be a need for updated woodland NVC surveys to be carried out in 2019. 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. Where assessment shows other impacts are likely to extend beyond this distance, you’re likely to need a larger buffer zone.* The submitted site plans must demonstrate that an ancient woodland buffer of at least 15m is incorporated in to the proposed development.

Air Quality

The site is in close proximity to the M25 which is an Air Quality Management Area. The inclusion of air quality within the Environmental Statement is welcome and the Council's Environmental Health department have raised no objections to the proposed content.

Contamination

The site overlies a chalk aquifer and any pathways for contamination must be strictly controlled to avoid pollution of the principal aquifers from any historic contamination identified on the site from previous uses.

The requirements of NPPF paragraph 170 must be followed. This states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Therefore in completing any site investigations and risk assessments applicant should assess the risk to groundwater and surface waters from contamination which may be present and where necessary propose appropriate remediation.

The applicant should:

- Applies the risk-based framework set out in the Model Procedures for the Management of Land Contamination (CLR11) and follow the guidance in that document so that the best decision are made for the site;
- Refer to the Environment Agency Guidance on requirements for land contamination reports;
- Use BS 10175 2001 Investigation of Potentially Contaminated Sites- Code of Practice as a guide to undertaking the desk study and site investigation scheme;
- Use MCERTS accredited methods for testing contaminated soils at the site, and
- Consult the Environmental Agency website for further information about any permissions that be required.

Landscape

The site in its entirety is located within the Kent Downs Area of Outstanding Natural Beauty (AONB) and the Metropolitan Green Belt. The site is also subject to a blanket Tree Preservation Order and has designated Ancient Woodland around much of its perimeter.

Kent Downs Areas of Outstanding Natural Beauty

The Environmental Statement should include an assessment of both the direct and indirect impacts of the proposal on the special characteristics and qualities of the Kent Downs AONB and the purpose of its designation i.e. the conservation and enhancement of natural beauty, as well as the policies of the AONB Management Plan.

In addition to obvious issues of importance to the AONB such as landscape and biodiversity, it will also be important for potential impacts on tranquillity including noise and light pollution, visitor pressure and transport impacts on the AONB to be assessed within the Environmental Statement.

It is agreed that the Environmental Statement should include a full Landscape and Visual Impact Assessment and the proposed methodology appears acceptable. It is also agreed that a Lighting and Night Time Assessment should also be undertaken. It will be important for this to include an assessment of the development on the dark skies and tranquillity of the Kent Downs AONB.

Given that a significant amount of tree cover in this locality is likely to comprise Ash, it will be important that the likely impacts of 'ash die back disease' is fully taken into account in assessing the visual impact of the proposal.

It is also considered necessary to assess the impacts of increased visitor pressure on the Kent Downs AONB. While provision of Green Infrastructure within the site may assist in ensuring pressure for recreational and leisure use on a regular basis is not deflected into the surrounding AONB and other sensitive areas, the significant increase in population and proximity to the AONB will be likely to result in people using the AONB for recreational purposes, the impacts of which need to be assessed as part of the Environmental Statement. This should include potential impacts on access land, rights of way, public open land and woodland and carparks serving such areas as well as on biodiversity. Right of Way Improvement Plans will assist in identifying Public Rights of Way require enhancement. This is discussed further below.

It will also be important to ensure that the impacts of the development in terms of higher usage of roads and potential traffic diversion/ displacement on the rural roads and the AONB are fully assessed and mitigation measures proposed to address any identified issues.

The Sevenoaks Landscape Character Assessment, January 2017, should also be included to inform the baseline conditions for the LVIA.

Where the scoping document references long distance views from the site, the references appear to be conflicting, namely in paragraphs 5.21 and 5.22. These sections should be carefully considered.

Trees and Ancient Woodland

The submission should include a full assessment of existing trees on the site, highlighting those to be removed and retained. Protection details should be included for those retained including the ancient woodland areas along with any access to them. Details of management of ancient woodland should be provided especially if any woodland areas are to be opened to the public.

The Forestry Commission has prepared joint standing advice with Natural England on ancient woodland, ancient trees and veteran trees which should be referred to as it notes that these are an irreplaceable habitats. It highlights the Ancient Woodland Inventory as a way to find out if woodland is ancient. Woodland under 2 hectares may not appear on the Ancient Woodland Inventory but may still have ancient woodland characteristics. It is suggested that a detailed investigation is undertaken to ascertain whether any additional ancient woodlands exist that may be impacted by the proposed scheme. Site investigations should be included in the Environmental Statement which identify ancient and veteran trees.

The standing advice provides details on the hierarchy of: avoid impacts, mitigate impacts and compensate as a last resort. This hierarchy could apply to any deterioration to woodland, ancient trees and veteran trees during the proposed development.

The scoping report appears to include no mention of ancient Woodland, ancient trees or veteran trees being “Irreplaceable Habitats” as per the NPPF. The Environmental Statement should reference any ancient woodland, ancient trees or Veteran trees impacted by the development.

Within the Constraints Map which forms Appendix B of the scoping report, ancient woodland is shown, but no other woodland. All woodland should be assessed for value and impact, and be considered within mitigation/ compensation provisions. We would also like to see the impact on neighbouring woodland to be considered in terms of the development and potential woodland recreational access.

Section 5.149 of the report states that “currently, surface water run off from the site either infiltrates into the subsoil via shallow soakaways or is discharged into the surrounding woodland via private drainage systems”. Direct impacts of the development on Ancient Woodland or Ancient and veteran trees include:

- Damaging or destroying all or part of them (including their soils, ground flora or fungi)
- Damaging roots and understorey (all vegetation under the taller trees)
- Damaging or compacting soil around the tree roots
- Polluting the ground around them
- Changing the water table or drainage of woodland or individual trees
- Damaging archaeological features or heritage assets.

The Environmental Statement should address these impacts, particularly if the surface water discharge is within ancient woodlands.

It is suggested that a UKFS-compliant Woodland Management Plan is considered for all woodland within the development. This will ensure the long term objectives of maintaining the woodland for screening and other benefits.

The Clean Growth Strategy (October 2017) sets out the Governments approach for meeting the fifth carbon budget (2028-32) and beyond. A key policy and proposals in the strategy is to use more UK timber within construction. The use of timber within the construction of homes and offices can lock in carbon. In addition there is the added benefit of stimulating positive woodland management to provide suitable material. Consideration of this would be welcome by the Forestry Commission.

The Clean Growth Strategy also encourages the take up of cleaner heating systems. Within a project of this size it would be positive to investigate the options for a District Heat network in areas of high heat demand. This would support the local woodlands in terms of supplying local material suitable for the heat network and may be appropriate as part of the mitigation work for the development. It would be beneficial for the Environmental Statement to make reference to the Clean Growth Strategy, emissions and carbon storage and how the development can support this approach.

Public Rights of Way

The scoping document refers to public rights of way under Landscape and Visual Effects. It is suggested that as the housing numbers are significantly increased in this application the impact would be greater as well in terms of noise, view, disruption during development and numbers of potential users of the local network, and that mitigation measures should not solely be viewed in terms of improved visual amenity. There should also be measurement of any enhancement features to be proposed or undertaken. The LVIA should therefore be updated to reflect this.

Please note that part of the southern area of the site is in an area of Open Access Land and as such may not be developed and must be accessible to the public. Its position can be viewed on the Natural England website under CRoW and Coastal Access Maps.

Improvements to the public rights of way network would be welcome, not only in terms of surfacing and the opportunity to connect the site more directly to the North Downs Way but also the re-instatement of rights of way lost when the site was taken over by the Ministry of Defence, which can be seen on the 1952 and 1970 Definitive Maps of paths in Kent, available from the Kent County Council Public Rights of Way Officer.

Flooding and Drainage

It is noted that flood risk is to be scoped into the Environmental Statement and a Flood Risk Assessment should be undertaken.

The submission should also include a Surface Water Management Strategy to adequately demonstrate how surface water will be managed within the development. The applicant is advised to review the Lead Local Flood Authority (KKC) document Drainage and Planning Policy Statement for further information and advice.

Water and waste water issues should be included in the Environmental Statement and Thames Water have requested that the following issues be considered for inclusion:

- The development's demand for sewage treatment and network infrastructure both on and off site and whether it can be met;
- The surface water drainage requirements and flood risk of the development both on and off site and whether it can be met;

- The development's demand for water supply and network infrastructure both on and off site and whether it can be met;
- Build- out-phasing details to ensure infrastructure can be delivered ahead of occupation;
- Any piling methodology and whether it will adversely affect the neighbouring utility services.

Additional information is available on the Thames Water website regarding the nature of information required on these matters.

Heritage Assets

The site includes a Scheduled Ancient Monument as well as designated heritage assets. A designated area of archaeological potential also surrounds the historic Fort.

The Environmental Statement should take into account the requirements of the NPPF which provides guidance on how to approach proposals affecting heritage assets and potential impact. Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations (NPPF para 184).

The applicant should describe the significance of all heritage assets affected, including any contribution made by their setting. The local planning authority will consider, among other considerations, opportunities for the development within the setting of heritage assets to enhance or better reveal their significance (NPPF para 200).

Archaeology

The developer should submit an archaeological desk-based assessment and Archaeological Mitigation Framework Strategy. (NPPF para 189).

The scoping report proposed that buried archaeological remains are 'scoped down' from the main report but included as technical appendices. Where development is proposed that might impact on buried archaeological remains associated with the schedule monument, such as development on the infilled section of the Fort ditch, an integrated assessment of historic structures and buried archaeological remains should be within the same chapter.

The original earthwork and fortification of Fort Halstead dates to the late nineteenth century and is a Scheduled Monument. It was built as one of a ring of Mobilisation Centres to defend London. The strategic and military advantages of this site were recognised in the early 20th century when the site became one of Britain's most important defence research establishments; it was vital in the UK's Second World War rocketry programme and later, pioneering work was undertaken for Britain's atomic bomb programme. Extant buildings on the site are believed to survive from all these periods including for the assembly of atomic weapons, the 1930s explosives handling area used for experimental rocket motor filling and possibly for housing a confiscated German wind tunnel after the war. There is, therefore, high potential for this site to contain highly significant buildings, structures, fittings, fixtures, features, deposits, landscaping, planting, routeways, spaces both visible and upstanding and buried. The diversity of the heritage complex needs to be fully appreciated in order to ensure suitable assessment is achieved.

Fort Halstead has various heritage assets, particularly the SAM and designated heritage assets but it also has potential to contain significant non-designated heritage assets. Some of these non-designated heritage assets may be directly associated with the important military heritage of the site. It includes both upstanding buildings and landscapes and buried remains, including structures. In view of the non-public dimension of the 20th century uses of this site, there is very high potential for this site to contain heritage assets of national importance which are as yet unknown. Due to limited access to this site, much of the heritage value of the site is not fully understood at this stage.

Although the focus of heritage interest in this site is the military usage, there is potential for multi-period archaeology, buildings and landscapes. Archaeological remains from earlier periods are recorded in the surrounding countryside and there is potential for remains from the prehistoric period onwards to survive within the development site. An ancient trackway crosses the site and the topographical location is likely to have been a focus for activity from the Prehistoric Period onwards.

The scoping report identifies the SAM Fort Halstead and the designated heritage assets. It also identifies the presence of buildings and structures which may be of heritage value.

However there should be increased understanding of how significant the contribution to the nation's military and defence heritage survives and could survive at Fort Halstead. Built Heritage is still scoped into the EIA, which is welcome, but an in depth study of all buildings not just the designated ones is encouraged. The full range of the "historic built environment" should be clearly demonstrated including the interrelationships between buildings, spaces, the group value of clusters of buildings, the layout of certain areas of the site specific to the function of certain buildings, etc, and the spaces and routeways in between the buildings of heritage interest.

It should also be noted that the military and research heritage of this site extends potentially up to the 1980s and includes cold war and nuclear research heritage elements.

Concern is raised with the proposal to scope down buried heritage - archaeology and it is recommended that it be scoped in. The scoping report incorrectly suggests that the only buried archaeology are associated with the 19th century fort complex or with earlier archaeology. The fundamental archaeology of the 20th century military and nuclear research heritage should be fully appreciated.

Archaeology of Fort Halstead is very closely connected to the upstanding built heritage. The nature of the complex means that there is high potential for buried military research structures and remains, some of which may be intact but some may just survive as demolished buildings and foundations below the current surface. Part of the significance of Fort Halstead is the group value and the site-wide interconnectivity of the military and research heritage assets. Buried archaeology for this scheme is not just isolated pockets of prehistoric or later remains but rather a whole multi-faceted landscape of the history of defence and nuclear research of national importance up to the 1980s. The buried archaeological remains of Fort Halstead as a military research centre are just as significant as the historic buildings and built heritage.

It is recommended that Archaeology should not be scoped out. It should be scoped in as a fundamental component of the historic environment. A reasonable, sound and robust Cultural Heritage assessment for an EIA would comprise assessment of built heritage, archaeology and historic landscapes and it would identify the close links between assessment of built environment with assessment of archaeology, buried and upstanding, and historic landscapes.

The setting of the Scheduled Monument and associated important historic buildings should be addressed, in consultation with Historic England. It would be preferable for the setting of the heritage assets to be enhanced and form a positive element of the redevelopment. Use and integration of the heritage assets can contribute to the character, quality and sustainability of a new development and provide a distinctive sense of place and identity for the new community.

The fall back position of the extant permission, and the conditions and obligations it contains, is acknowledged. However it remains our advice that the above issues be addressed as part of the EIA which will inform a new planning application for an increased intensity of development on this site.

The assessment of built heritage and buried archaeological remains should be taken into account from the earlier stages of design. The quantum of development and design should both be responsive to the findings of heritage assessment in order to conserve and enhance the heritage significance of the place as much as possible. The Environmental Statement should facilitate an integrated approach by supplying the information that is necessary to do so in a format that is helpful for designing to sustain the heritage significance and character of individual heritage assets and the place generally. It is essential that the EIA process provides an Archaeological Mitigation Framework Strategy. This AMFS should set out mitigation for the SAM as well as framework for a full programme of archaeological historic landscape survey and resulting mitigation, and a full programme of historic building recording work, and mitigation, and programme of archaeological work, and mitigation. There should also be clear reference to post excavation programme, publication programme and a programme and timescale for heritage interpretation.

Highways

The Environmental Statement should include a Transport Assessment and Travel Plan to assess the impact of the proposal on the local highway network. Kent County Council form for the Highways Authority for this area and will assess any future submissions as a statutory consultee.

Highways England will be concerned with proposals that have potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the M25 and M26 in the vicinity of Sevenoaks.

No objection was raised by Highways England in relation to the earlier outline planning application, however the scoping report details that a further Transport Assessment will be carried out to examine the net impacts arising from the additional development associated with this proposal and also that a scoping study for the Transport Assessment has been submitted to the Highway Authority to formally agree the content of the new assessment. It is advised that Highways England are also included in the scoping exercise to help identify any issues at an early stage.

The applicant should have regard to the following documents: Department for Transport Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development (September 2013) and; Planning for the Future- A guide to working with Highways England on planning matters (September 2015).

The Environmental Statement should also consider the full effects of the development on the A21 and A233 which fall within the London Borough of Bromley.

Noise

The development will require acoustic assessment to include evaluations to BS 8233:2014, BS 4142:2014 and for the construction activities BS 5228:2009+A1:2014. The assessment should evaluate the potential impact of transport and commercial noise sources with an emphasis on the protection of dwellings from noise and minimising the noise exposure to amenity space.

Climate Change

As discussed above, the proposals should consider opportunities for generating and providing their own energy, whether through a site wide energy scheme, or for specific commercial buildings. Technologies are available for the use of PV tiles or cladding which can generate electricity and obviate the needs for traditional panels.

The Council's Economic Development team have advised that a benefit could be obtained through consideration of flexible buildings that allow easy internal rearrangement and interoperability between tech space, office space and teaching to allow for a variety of occupiers in the future.

Yours sincerely,

Aaron Hill

B. Indicative Summary Floorspace Schedule

INDICATIVE SUMMARY FLOORSPACE SCHEDULE		INCLUDING PRIMARY SCHOOL	EXCLUDING PRIMARY SCHOOL
BUSINESS FLOORSPACE	USE CLASS	GEA (SQ M)	GEA (SQ M)
QinetiQ - Retained Buildings (X series)	B1a/b/c/ B2 / B8	6,016	6,016
Innovation Hub Area E1 – Retained Buildings (A1, A3)	B1a/B1b	2,271	2,271
Innovation Hub Area E2 – Retained Buildings (A10, A11, A13, A14)	B1a/B1b/ B1c	2,203	2,203
Innovation Hub Area E2 – New Build (Buildings 1 & 2)	B1c	2,092	2,092
Innovation Hub Area E3 – New Build (Buildings C1–C4)	B1a/B1b/B1c	5,784	5,784
Innovation Hub Area E4 – Existing Buildings (X2, X3, X38)	B1c	492	492
Innovation Hub Area E5 – New Build (Buildings 3-6)	B1a/B1b/B1c	-	7,323
Village Centre Area M1 – Retained Buildings (Q13, Q14)	B1a/B1b	1,006	1,006
Village Centre Area M1 – New Build (Atrium)	B1a/B1b	196	196
Village Centre Area M3 – New Build (Block D)	B1a/B1b	276	276
Village Centre Area M4 – New Build (Buildings V1-V5)	B1a/B1b	5,975	-
Subtotal		26,311	27,659
VILLAGE CENTRE / FORT FLOORSPACE			
Village Centre Area M1 – Existing Building (Q14) – Community/Gym	D1/D2	282	282
Village Centre Area M2 – New Build (Block B) – Community	D1	270	270
Village Centre Area M3 – New Build (Block C) – Nursery	D1	240	240
Village Centre Area M3 – New Build (Block C) – Shop and Cafe	A1 & A3	520	520
Primary School – New Build	D1	1,345	-
Fort Area – Retained Buildings (F series) - Community	D1	1,794	1,794
Bunkers – Retained Buildings (M4, M5, M6, M20, M21, M22, M23, M24, R58, R59) - Community	D1	500	500
Subtotal		4,951	3,606
TOTAL FLOOR AREA		31,262	31,265

C. Schedule of Demolition

D. Green Belt Assessment

Table 1: Green Belt Purpose Criteria Assessment (NPPF Paragraph 134)

Criteria	Commentary
a) to check the unrestricted sprawl of large built-up areas;	The site is not contiguous with the border of any large built up areas, and is not related in character to existing settlements or urban areas by virtue of its pattern of development and location. It therefore does not play a role in checking unrestricted sprawl of large built up areas.
b) to prevent neighbouring towns merging into one another;	The site does not have any neighbouring towns, nor is it close enough to any of the surrounding settlements to result in 'merging'. Therefore, the site has no role in preventing neighbouring towns merging.
c) to assist in safeguarding the countryside from encroachment;	The site comprises in the region of 60 ha of previously developed land within the Green Belt. Therefore, the extent to which it can be argued to be 'countryside's is limited, as there is already substantial development on the site. The site plays a very small role in safeguarding the countryside from encroachment as it will open up areas of land not previously accessible. Albeit noting that this is arguably a benefit of the scheme in other ways, against other policy goals, including NPPF paragraph 138 regarding compensatory improvements to Green Belt land remaining.
d) to preserve the setting and special character of historic towns;	The site is not close to any historic town and as such does not contribute towards this purpose. Heritage matters are discussed elsewhere in relation to the planning application.
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The site makes a significant positive contribution towards this purpose, as it will regenerate and redevelop brownfield land which is to become redundant and derelict when vacated by the current main occupier, Dstl. It will provide significant local regeneration with the provision of jobs, social infrastructure, homes and affordable homes.