

HPC Response to Fort Halstead Amended planning application July 2020

Halstead Parish Council continues to have concerns about this application and our previous response of November 2019 still stands. In addition, we have a number of further comments to be added:

1. CoVid-19 impact on the application

"The Covid 19 –pandemic is a wake-up call – the way we live is neither sustainable nor fair" SUSTRANS

"Now is the time for the Government to be bold and ambitious for the future"
DG NT

This application was amended before lockdown and now there are several factors that should be taken into consideration that are being widely discussed across the UK and will influence the way we all live in years to come. Naturally, the pandemic will have a profound effect on the way we live and the way we work, plus a direct impact on the feasibility of such large-scale developments from a financial perspective.

2. This is an increase in houses, not a decrease.

This amended proposal suggests the amendment is to reduce from 750 houses to 635. 750 houses have not been granted only 450 in the extant planning application of 2015. 635 new houses represent a 41% increase on the original approved application figure of 450 houses.

3. Proposed density is too high.

The density of the surrounding parish of Halstead in which Fort Halstead exists is 15-18DPH. Density suggestions of between 25-50DPH are too high and will have a significant impact on the surrounding areas, both on the infrastructure, the community and the landscape.

Fort Halstead is on Green Belt and AONB land and its special qualities must be respected. The council considers the increase in density to be inappropriate and is in total conflict with the NPPF which suggest that development within any AONB 'should be limited in scale and extent'. This proposal continues to disregard that fact.

We also know we are a fast-moving environment after CoVid-19 and that a number of employers are rethinking their strategy on home-working. This would imply that houses will need more space to enable that homeworking. A reduced density will allow for an increase in size. We have seen previous developments in our village being restricted by covenants that say they cannot build sheds or offices within their back gardens – if similar covenants are imposed on Fort Halstead then there will be little option for new residents than to compromise their work/life balance.

4. Highlight and mitigate contamination concerns.

The residents of Halstead have strong links to this site as a place of employment and are well-aware of the activities that have taken place here across the past 350 years using dangerous materials. Residents of Halstead still recollect the perceived effects of work undertaken at the Fort including an increase in sudden childhood deaths and an increase in cancer diagnosis amongst residents. Whilst we

understand that independent inspections of this site have taken place and plans are in place to mitigate any issues uncovered, we feel it is the responsibility of Sevenoaks District Council and the developers to address the issues directly with language that is easily accessible to all. The technical documents provided make little sense to the majority and all parties **must** understand that this issue is of highest concern with the local community.

5. An Employment led application that promotes commuting?

The amended report indicates buses will be organised to take commuters to Knockholt Station. The increase in commercial space is not justified if the working population are to commute elsewhere. The original outline application was granted under the assumption it was employment led. Once again, we see a development being proposed that does not look to fulfil the housing requirements of Sevenoaks but for London and commuters to the city.

Current employers of the site - QinetiQ – plan to remain. It is stated in paragraph 2.15 of the Planning Statement Addendum that their plans for the future will include, “explosive testing/research, small scale, low volume explosives manufacture and storage of explosives, as happen at present. It seems unacceptable that a development of this magnitude should be allowed in the close vicinity of these practices. Previous residential areas have all been outside the perimeter and secured utilising Fort Police. Is there a plan moving forward which mitigates the risk of families, with their children and inquisitive young people, living near a company that carries out such practices?

6. Transport concerns

Cycle paths

SDC need to publicise their ambitions for more cycle ways throughout the Sevenoaks District given that there has been a call for more cycle ways for many years. This is now highlighted by the Covid-19 experience and the desire of both locals and visitors to use bikes. The planners have put quite an emphasis on the use of bikes and have suggested quite a few cycle tracks. Some of them are feasible; there are others that involve the use of local lanes that would need reviewing. SDC need an overall plan for much more cycling in response to the Covid-19 pandemic, climate change and other matters.

SDC cycleways should link with the cycleways proposed at Fort Halstead to enable the future employees to travel safely from Sevenoaks, London and all areas in between. This will need dramatic and expensive action to which CBRE must contribute if they are to live up to their claims of sustainable travel.

Buses

CBRE know the 402 has been withdrawn and replaced with route 3. (At present suspended and replaced with GO! Travel). At this early stage it is not clear of the exact intentions regarding services, frequency and destinations. If the developer wishes to keep people out of their cars, the level of service must increase. One bus every 2hrs is of no use. It puts people off using buses. CBRE talk of a bus turn round area off Star Hill where the children could be dropped off, do they know the buses are already full? Children getting off the bus will be picked up by car, particularly the younger ones, where will Parent/Carers park and turn round?

The updated transport assessment 8.3.7 indicates the school bus will not be required if ALL CHILDREN attend the new school. Parents have choice and they decide which school to send their children to for a variety of reasons, not necessarily the nearest. What about transport for the Secondary School children?

Traffic

It is impossible to accept that traffic will not increase given that the commercial area will employ over one thousand people and add into that 450 – 635 homes.

7. Ongoing concerns about water supply

The water quality within the site is so poor that residents are often without drinking water due to unknown sources of contamination. Residents spent 37 weeks without drinking water in 2018, more than 5 weeks in 2019 and 2 more periods already in 2020.

20 November 2019 from DSTL:

"We are pleased to confirm that all remedial work to the water distribution system has successfully been completed. We are now in a position to confirm that the water samples taken have passed. We appreciate that the residents have been significantly inconvenienced, therefore please thank them for their patience at this time."

There is still yet to be confirmation as to who will provide water for the new development and what impact a new development will bring to a current over complicated system; which requires residents to flush through their properties on a regular basis.

In the latest application, the developers are repeating what they said in the last application, which is that the demand for drinking water is not anticipated to be any higher than the current usage. The technical nature of the language used makes it unclear to the layman if there is sensible justification for this assessment, but it seems highly unlikely that the construction of 635 homes will result in anything but an increase in demand.

The Water Resources and Flood Risk document (018N - VOLUME 2) states that: Confirmation will also be sought from Thames Water to ascertain whether their existing infrastructure is sufficient to supply the proposed development, with any necessary off-site reinforcement works being undertaken as part of the construction phase.

The response from Thames water to the first submission of this application was that *there is an inability of the existing water network infrastructure to accommodate the needs of this development.*

8. Finance

As mentioned, we would like to be assured that the financial feasibility study will be re-evaluated post pandemic. It would be all too convenient for the impact of Covid-9 to many of the non-profitable aspects of the development get pushed to the wayside.

We note that in the appraisal results within the executive summary are already edging towards removal of affordable housing.

9. Impact on the Green Belt

Halstead Parish Council believe that this proposal should be considered unacceptable development in the Green Belt. We understand that SDC consider this site a Major Development Site and as such afford it lesser protection than the surrounding Green Belt areas but the Green Belt SPD still is clear that the development should have no greater impact than the existing development on the openness of the Green Belt and not exceed the height of the existing buildings.

We can see that the majority of existing buildings are up to 6m from the ridgeline, with some up to 9m and only single buildings go higher. We would argue that it is against the spirit of the SPD and indeed the NPPF to take the heights of those small amount of higher buildings and apply that height as the standard across the site. We see that the majority of the proposed site contains heights of up to and over 12.5m which we feel will have a significant impact on the openness of the Green Belt which can be seen for miles across the District.

10. What about current occupants of Fort Halstead?

Residents of the current residential area of Fort Halstead have been left wondering what happens to them once the proposed development is completed. There seems to be no specific mention of how they will be integrated into the new estate. If this is not to be by including the current roads in plans for infrastructure, then how does it affect the payments made by the current resident to upkeep the roads and the water supply specifically.

A specific plan showing the integration of the existing properties into the overall development is essential. Failure to provide this will frustrate the harmonious future for all residents.