

Appendix 2.2

FORMAL EIA SCOPING OPINION & SUBSEQUENT CORRESPONDENCE

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;

- 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

Claire Shearing
Principal Planning Officer
Sevenoaks District Council



Kent Downs
AONB Unit
West Barn
Penstock Hall
Farm
Canterbury
Road
East
Brabourne

Sent by email to:
Claire.shearing@sevenoaks.gov.uk
DC.North@sevenoaks.gov.uk

26 November 2018

Dear Claire

Application: PA/18/00488

Fort Halstead, Star Hill Road, Dunton Green, Kent

Request for a Scoping Opinion for an EIA for the redevelopment of Fort Halstead including:

- **Up to 540 residential units**
- **Up to 27,000sqm business area**
- **Hotel of up to 80 beds**
- **Village Centre**
- **Use of Fort Area and bunkers as an historic interpretation centre**

I write with reference to the above application for an EIA scoping opinion. The following comments are from the Kent Downs AONB Unit and as such are at an officer level and do not necessarily represent the comments of the whole AONB partnership. The legal context of our response and list of AONB guidance is set out as Appendix 1 below.

We note that the above description refers to 540 dwellings, however have assessed the proposal on the basis of the description in the Scoping Report, i.e. 750 residential units.

The AONB Unit agrees with the assessment of the applicant that that the proposal falls within Schedule 2 of the 2017 EIA Regulations, due to the scale of the development and that in view of the potential for significant environmental impacts, an Environmental Statement (ES) will be required.

Given the scale of the development and the fact that the site lies wholly within the AONB, we consider that the ES 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

Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
Chichester Harbour
Chilterns
Clwydian Range
Cornwall
Cotswolds
Gower
Cranbourne Chase and
West Wiltshire Downs
Dedham Vale
Dorset
East Devon
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of



CUSTOMER SERVICE EXCELLENCE



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 ES.

The AONB agrees that the ES should include a full Landscape and Visual Impact Assessment and agrees with the proposed methodology. We also agree that a Lighting and Night Time Assessment should also be undertaken as part of the ES. It will be important for this include an assessment of the development on the dark skies and tranquillity of the Kent Downs AONB.

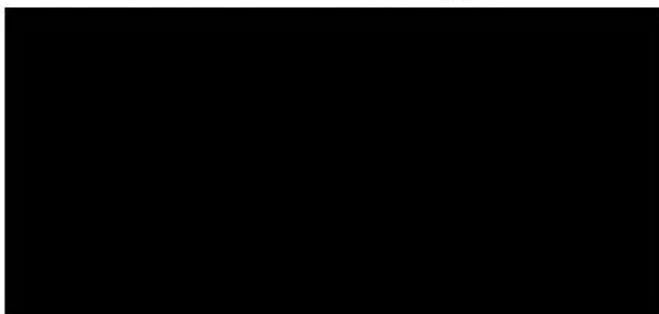
Given that a significant amount of tree cover in this locality is likely to comprise Ash, it will be important that the likely impacts of ash die back disease is fully taken into account in assessing the visual impact of the proposal.

It is also considered necessary to assess the impacts of increased visitor pressure on the Kent Downs AONB. While the provision of Green Infrastructure within the site may assist in ensuring pressure for recreational and leisure use on a regular and daily 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 an increase in people using the AONB for recreational purposes, the impacts of which need to be assessed as part of the ES. 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 that require enhancement.

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 of the AONB are fully assessed and mitigation measures proposed to address any identified issues.

I hope you find these comments useful. I would be happy to discuss further if this would be helpful.

Yours sincerely



Katie Miller
Planning Manager, Kent Downs AONB Unit

APPENDIX 1

Planning consultations with the Kent Downs AONB Unit

Background and context:

The Kent Downs Area of Outstanding Natural Beauty partnership (which includes all the local authorities within the AONB) has agreed to have a limited land use planning role. In summary this is to:

- Provide design guidance in partnership with the Local Authorities represented in the AONB.
- Comment on forward/strategic planning issues-for instance Local Development Frameworks.
- Be involved in development management (planning applications) in exceptional circumstances only, for example in terms of scale and precedence.
- Provide informal planning advice/comments on development control (planning applications) at the request of a Kent Downs AONB Joint Advisory member and /or Local Authority Planning Officer.

The Countryside and Rights of Way Act 2000

The primary legislation relating to AONBs is set out in the Countryside and Rights of Way Act 2000. Section 85 of this Act requires that in exercising any functions in relation to land in an AONB, or so as to affect land in an AONB, relevant authorities, which includes local authorities, shall have regard to the purpose of conserving and enhancing the natural beauty of the AONB. This is known as the 'Duty of Regard'. The Duty of Regard can be demonstrated by testing proposals against the policies set out in the Kent Downs AONB Management Plan and its supporting guidance (see below).

Relationship of the AONB Management Plan and Development Management

The CRoW Act requires that a management plan is produced for each AONB, and accordingly the first Kent Downs AONB Management Plan was published in April 2004. The second revision Management Plan (2004-2019) has been formally adopted by all the local authorities of the Kent Downs. The Management Plan may be viewed on the Kent Downs web site. Please let us know if you would like any hard copies.

<https://s3-eu-west-1.amazonaws.com/explore-kent-bucket/uploads/sites/7/2018/04/18113849/KDAONB-Management-Plan.pdf>

Under the CRoW Act, the Management Plan is required to 'formulate the (Local Authority) policies for the management of the AONB and for carrying out their functions in relation to it'. The policies of the Kent Downs AONB Management Plan are therefore the adopted policies of all the Local Authorities in the Kent Downs. The national Planning Policy Guidance confirms that AONB Management Plans can be a material consideration in planning decisions and this view is confirmed in previous appeal decisions, including APP/U2235/W/15/3131945, Land west of Ham Lane, Lenham, Maidstone, where at para 48 of the Inspectorate's decision letter, it is

confirmed that “the Kent Downs AONB Management Plan April 2014 (the Management Plan) is also a further significant material consideration”. The decision can be downloaded at:

<https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3131945>

Any Kent Downs AONB Unit response to consultations on planning applications will reflect the policies of the Management Plan along with other Kent Downs AONB produced guidance which help support the delivery of the policies of the Management Plan, as set out below.

Other Kent Downs AONB Guidance

Kent Downs Landscape Design Handbook

Design guidance based on the 13 landscape character areas in the Kent Downs. Guidance is provided on fencing, hedges, planting, gateways etc. to help the conservation and enhancement of the AONB.

Kent Downs Renewable Energy Position Statement

Provides a clearly articulated position for the Kent Downs AONB partnership with regards to renewable energy technologies. It recognises that each Local Planning Authority must balance the impact of proposals for renewables on the AONB with all the other material planning considerations.

Kent Rural Advice Service Farm Diversification Toolkit

Guidance on taking an integrated whole farm approach to farm developments leading to sound diversification projects that benefit the Kent Downs.

Kent Downs Land Manager's Pack

Detailed guidance on practical land management from how to plant a hedge to creating ponds and enhancing chalk grassland.

Rural Streets and Lanes - A Design Handbook

Guidance on the management and design of rural lanes and streets that takes the unique character of the Kent Downs into account. This document discusses the principle of shared space and uses examples from around the UK and Europe. The Handbook has been adopted by Kent County Council as policy.

Managing Land for Horses

A guide to good practice on equine development in the Kent Downs, including grassland management, fencing, trees and hedges, waste management and basic planning information.

Kent Farmstead Guidance and Kent Downs Farmstead Guidance

Guidance on the conservation, enhancement and development change of heritage farmsteads in the Kent Downs based on English Heritage’s Kent and National Character Area Farmstead Statements. Includes an Assessment method and Design Guidance.

The above documents are available to download at:

<https://www.kentdowns.org.uk/planning/planning-publications/>

The NPPF and AONBs

National planning policies are very clear that the highest priority should be given to the conservation and enhancement of Areas of Outstanding Natural Beauty. The NPPF confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status.

Paragraph 172 of the revised NPPF specifies that 'great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.' It is advised that the scale and extent of development within AONBs should be limited and that major developments should be refused in AONBs except in exceptional circumstances and where it can be demonstrated that they are in the public interest. No definition is given as to what constitutes major development within an AONB, however a footnote to this paragraph states that this is 'a matter for the relevant decision taker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined'.

The thrust of the NPPF as set out in paragraph 11 is that there is a presumption in favour of sustainable development. It specifies that in respect of decision taking, proposals that are in accordance with an up to date development plan should be granted, however where there are no relevant development plan policies, or policies are out of date, permission should be granted unless the application of specific policies in the Framework that protect areas of particular importance provide a clear reason for refusing the development. Footnote 6 to this paragraph specifies that such policies include those relating to AONBs. A Court of Appeal case in June 2017¹ clarified that identification of policies indicated in Footnote 6 (previously footnote 9 to paragraph 14 of the 2012 NPPF), does not shut out the presumption in favour, rather the specific policy or policies have to be applied and planning judgment exercised. In the case of AONBs, this would mean an assessment of the acceptability of the proposal against paragraph 172 of the NPPF.

¹ Barwood Strategic Land II LLP (Appellant) and (1) East Staffordshire Borough Council and (2) Secretary of State for Communities and Local Government (Respondents), on appeal from the Administrative Court Planning Court, [2017] EWCA Civ 893 Case No: C1/2016/4569 [2016] EWHC 2973 (Admin), before: Lord Justice Gross, Lord Justice Underhill and Lord Justice Lindblom, on 25th May 2017.

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 scheduled 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.

Sevenoaks District Council
Development Control
Council Offices Argyle Road
Sevenoaks
Kent
TN13 1HG

Our ref: KT/2018/125012/01-L01
Your ref: PA/18/00488
Date: 13 December 2018

Dear Sarah Cottingham,

REQUEST FOR A 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.

FORT HALSTEAD (BUILDING H14) CROW DRIVE, SEVENOAKS, KENT, TN14 7BP.

Thank you for consulting us on the above scoping opinion.

We have reviewed the information submitted and have the following comments to make:

This site overlies a chalk aquifer, 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.

At this stage, the Environment Agency does not provide detailed site-specific advice or comments with regard to land contamination issues apart from identifying the site sensitivity as above.

Whilst we will not be providing specific advice at this stage in the planning process, it is recommended that the requirements of the National Planning Policy Framework (NPPF) are followed. Paragraph 170 of the NPPF 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 water pollution. Therefore, in completing any site investigations and risk assessments the applicant should assess the risk to groundwater and surface waters from contamination which may be present and where necessary propose appropriate remediation.

In making our response we have considered issues relating to controlled waters. The evaluation of any risks to human health arising from the site should be discussed with the Environmental Health Department.

We recommend that the applicant:

- Applies the risk-based framework set out in the Model Procedures for the Management of Land Contamination (CLR 11) and follow the guidance in that document so that the best decision are made for the site;
- Refers to the Environment Agency guidance on requirements for land contamination reports;
- Uses BS 10175 2001, Investigation of potentially contaminated sites – Code of Practice as a guide to undertaking the desk study and site investigation scheme;
- Uses MCERTS accredited methods for testing contaminated soils at the site; and
- Consult our website at www.environment-agency.gov.uk for further information about any permissions that may be required.

Please don't hesitate to contact us if you need any further information.

Decision notice request

We record the outcome of planning decisions and request the decision notice is emailed to kslplanning@environment-agency.gov.uk

Yours faithfully,

Ms Sara Gomes
Planning advisor

Direct dial 020 8474 8283

Direct e-mail kslplanning@environment-agency.gov.uk

Sarah Cottingham

Senior Planning Officer
Sevenoaks District Council
Argyle Road
Sevenoaks
Kent
TN13 1HG

South East & London Area Office
Bucks Horn Oak
Farnham
GU10 4LS

Tel: 0300 067 4167
richard.pearce@forestrycommission.gov.uk

Area Director
Alison Field

Date: 17th December 2018
Our ref: 23.Sevenoaks. PA/18/00488
Your ref: PA/18/00488 - Fort Halstead EIA Scoping Opinion

BY EMAIL ONLY

Dear Sarah,

Fort Halstead EIA Scoping Opinion

Thank you for consulting the Forestry Commission on the scope of the Environmental Statement (ES) in your email dated 28th November 2018. We have reviewed the Environmental Impact Assessment Scoping Report in particular sections relating to woodland and trees.

The Forestry Commission is the Government experts on forestry & woodland that works with others to protect, improve and expand our nation's forests and woodland, increasing their value to society and the environment.

The Forestry Commission's responsibility is to discharge its consultee roles as efficiently, effectively and professionally as possible, based on the forestry principles set out in The UK Forestry Standard (UKFS) (4th edition published 2017). Page 23 "Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance (SLNCIs).

As highlighted in the National Planning Policy Framework revised July 2018¹: Irreplaceable habitats include ancient woodland, ancient trees and veteran trees:
Paragraph 175c – "*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*"

The Forestry Commission has also prepared joint standing advice with Natural England on ancient woodland, ancient trees and veteran trees² which we refer you to as it notes that ancient woodland, ancient trees and veteran trees are an irreplaceable habitat, and that, in planning decisions, Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland. It highlights the Ancient Woodland

¹ <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

² <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

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, so we would suggest that a detailed investigation is undertaken to ascertain whether any additional ancient woodlands exist that may be impacted by the proposed scheme. Site investigations for the ES should 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.

There are a number of ancient woodlands present in and around the proposed location. The map in appendix 1 shows their locations.

Throughout the scoping report there appears to be no mention of Ancient Woodland, Ancient Trees or Veteran Trees being “Irreplaceable Habitats” as per the National Planning Policy Framework. The ES should reference any ancient woodland, ancient trees or veteran trees impacted by the development.

Within the Appendix B Constraints Maps – they show Ancient Woodland but no other woodland, we would like to see all woodland assessed for value and impact, and to 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.

Within section 5.149 it states “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 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 the 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 ES should address the above, particularly if the discharge is to within Ancient Woodlands.

We also suggest 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 Government’s 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. We would welcome the consideration of this within the development.

The Clean Growth strategy also encourages the take up of cleaner heating systems. With 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 ES to make reference to the Clean Growth strategy, emissions and carbon storage and how the development could support the above approach.

If you wish to consult us further in relation to the Environmental Statement with the Forestry Commission please contact the South East and London Office at the above address.

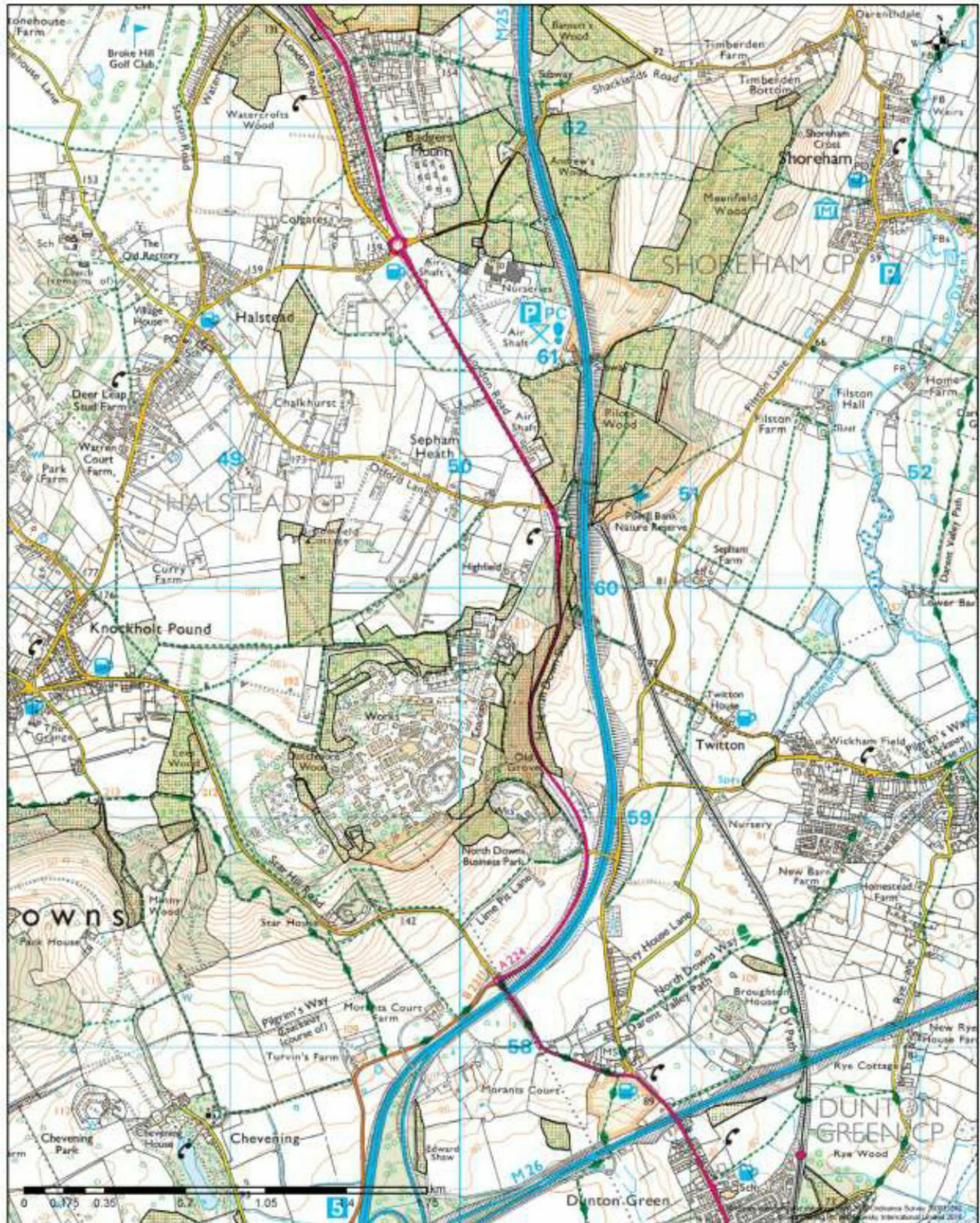
Yours sincerely

Yours sincerely

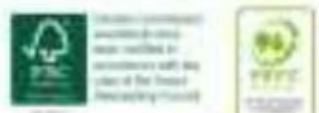


Richard Pearce
Local Partnership Adviser



Appendix 1:
AW map



Title: **Fort Halstead**
Date: 14 December 2018
Author: Richard Pearce
Scale @ A3: 1:15,000



Ancient Woodlands (Eng.)

-  Ancient & Semi-Natural Woodland
-  Ancient Replanted Woodland

From: Claire Shearing
Sent: Thu, 13 Dec 2018 15:58:45 +0000
To: Planning Comments
Subject: FW: Consultation Response: DRA Fort Halstead Otford Lane Halstead Kent

Please could this email be added as the Highways England response to PA/18/00488.

Thanks, Claire

From: Burgess, Janice [mailto:Janice.Burgess@highwaysengland.co.uk]
Sent: 12 December 2018 17:45
To: DC North; Claire Shearing
Cc: Planning SE
Subject: Consultation Response: DRA Fort Halstead Otford Lane Halstead Kent

For the attention of: Claire Shearing

Planning Application No: PA/18/00488

Site: DRA Fort Halstead Otford Lane Halstead Kent

Proposal: Request for a 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.

Highways England Reference: 5826

Dear Claire

Thank you for your letter dated 27 November 2018, inviting Highways England to comment on the above planning application and indicating that a response was required by 18 December 2018.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

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

Highways England have no comment on whether an EIA is required; but if it is (or is produced voluntarily), it should be compatible and consistent with the Transport Assessment (TA) and also contain information on all transport related effects including noise, vibration and air quality.

No objection was raised by Highways England related to the permitted planning application reference 15/00628. We note that the EIA Scoping Report states in paragraph 5.87 that a further Transport Assessment (TA) 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 TA has been submitted to the Highway Authority (KCC) to formally agree the content of the new assessment. We would request that Highways England are also included in the Scoping exercise; early pro-active engagement will help to identify issues at an early stage. In the meantime we refer the applicant to the following documents which contain useful information on what we would like to see included in a planning proposal, and outlines the support we can offer:

- DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development (Sept 2013)
- Planning for the future – A guide to working with Highways England on planning matters (Sept 2015)

Please also note that using the PA/18/00488 application number in the search function on the planning portal appeared to link to an unrelated application.

I hope the above comments are useful. Should you have any questions or comments then please do not hesitate to contact us.

Regards

Janice Burgess, Spatial Planning Manager Area 5

Highways England Company Limited
Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ
Registered in England and Wales No. 9346363

Direct Tel: 0300 470 1055 | Mobile: 07834 333782

www.highwaysengland.co.uk



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Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

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Historic England

SOUTH EAST OFFICE

Ms Claire Shearing
Sevenoaks District Council
Council Offices
Argyle Road
Sevenoaks
Kent
TN13 1HG

Direct Dial: 01483 252032

Our ref: PL00511642

5 December 2018

Dear Ms Shearing

**Town and Country Planning (EIA) Regulations 2017
Scoping Opinion - Fort Halstead**

Thank you for consulting Historic England about this Scoping Report. We are the Government's lead advisory body for the historic environment and have a statutory role in the planning system. Central to our role is the advice we give to applicants, local planning authorities and government departments on development proposals affecting the historic environment. We are pleased to provide pre-application advice where this will help inform proposed development that might affect heritage assets.

We recommend that you should obtain expert and independent archaeological advice about un-Scheduled archaeological remains and Listed Buildings from your archaeological advisors at Kent County Council and your own Council's Conservation Officer. This should include advising on the scope of Environmental Impact Assessment.

The EIA should take into account the requirements of the National Planning Policy Framework (NPPF), which provides clear guidance on how to approach proposals affecting heritage assets and potential impacts. 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).

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Where appropriate, developers should be required to submit an archaeological desk-based assessment and field evaluation (NPPF 189). Local planning authorities should take this into account when considering the impact of a proposal on a heritage asset to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal (NPPF 190). Local Authorities should also look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance (NPPF 200).



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252020
HistoricEngland.org.uk





Historic England

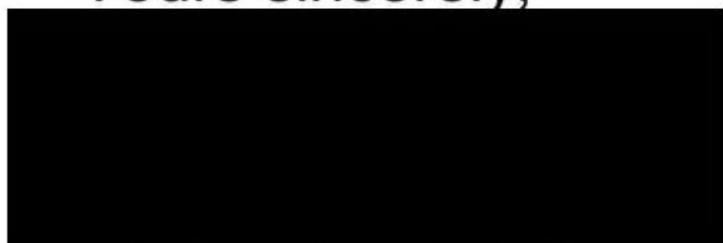
SOUTH EAST OFFICE

We recommend the following matters are taken into consideration in undertaking the EIA:

1. The report proposes that buried archaeological remains are “scoped down” i.e. excluded from the main report but included in as technical appendices. We recommend that you take advice from your archaeological advisors in the Kent County Council Heritage Team about this proposal and we would defer to them except where buried archaeological remains might occur on and in the vicinity of the scheduled monument. Where development is proposed that might impact on buried archaeological remains associated with the scheduled monument, such as development on the infilled section of the fort ditch, we would expect to see an integrated assessment of historic structures and buried archaeological remains in the same chapter.
2. The assessment of built heritage and buried archaeological remains should be taken into account from the earliest 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 EIA should facilitate such 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 of the place generally.

We will be pleased to advise you further when more information is available. In the meantime, we hope that this advice will be helpful.

Yours sincerely,



Paul Roberts MCIFA
Inspector of Ancient Monuments
Paul.roberts@HistoricEngland.org.uk

cc: Wendy Rogers, Kent Council Council Heritage Team



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252020
HistoricEngland.org.uk





Claire Shearing
Principal Planning Officer
Community and Planning Services
Sevenoaks District Council
PO Box 183
Argyle road
Sevenoaks
Kent
TN13 1GN

**Heritage
GT EPE**

Invicta House
County Hall
MAIDSTONE
ME14 1XX

Phone: 03000 413448
Ask for: Ms Wendy Rogers
Email: wendy.rogers@kent.gov.uk

10 December 2018

SENT BY EMAIL

Re: SE/PA/18/00488 – DRA Fort Halstead Otford Lane Halstead

Thank you for your letter consulting us on the scoping opinion for an EIA for the redevelopment of Fort Halstead including the provision of employment land, up to 750 dwellings, village centre and associated works, including a historic interpretation centre.

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 is a complex site with various heritage assets, particularly the SAM and designated heritage assets. 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 which may be of heritage value. However there seems to be a limited understanding of how significant the contribution to the nation's military and defence heritage survives and could survive at Fort Halstead. I note that Built Heritage is still scoped in, which I welcome, but I encourage an in depth study of all buildings not just the designated ones. The full range of the "historic built environment" needs to 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 remembered that the military and research heritage of this site extends potentially up to the 1980s and includes cold war and nuclear research heritage elements.

I do not agree with the proposal to scope down buried heritage – archaeology. The reasons for scoping down buried archaeology in section 6.1 to 6.16 reflect a complete misinterpretation of the heritage significance of Fort Halstead. The Scoping Report suggests that the only buried archaeology are associated with the 19th century fort complex or with earlier archaeology. CBRE have completely ignored the fundamental archaeology of the 20th century military and nuclear research heritage. I recommend that this is not an acceptable approach.

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. 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.

I recommend buried archaeology should be scoped in alongside built heritage and historic landscapes in view of the potential for highly significant buried archaeology and sensitive historic landscapes to be a constraint on development. In order to appropriately understand the historic environment sensitivities and ensure informed decisions are made, the historic environment needs to be assessed in its entirety.

The setting of the Scheduled Monument and associated important historic buildings needs to 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.

In summary, I welcome the inclusion of assessment of built heritage. However, I strongly object to the scoping down of buried archaeology and suggest this reflects a fundamental misunderstanding of the historic significance of Fort Halstead. The archaeology of Fort Halstead may be a constraint on development and as such it needs to be considered in the EIA. I recommend that buried archaeology is assessed alongside built heritage and historic landscapes.

I would be pleased to discuss any of the above further.

Yours sincerely

Wendy Rogers
Senior Archaeological Officer
Heritage Conservation



ECOLOGICAL ADVICE SERVICE

TO: Sarah Cottingham

FROM: Helen Forster

DATE: 18 December 2018

SUBJECT: Fort Halstead, Dunton Green PA/18/00488

The following is provided by Kent County Council's Ecological Advice Service (EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the County Council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application; and whether sufficient and appropriate ecological information has been provided to assist in its determination. Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the Planning Officer, who will seek input from the EAS where appropriate and necessary.

We have reviewed the submitted information and we are satisfied with the range of ecological surveys which have been carried out or in the process of being carried out. The results of the ecological surveys, details of the proposed mitigation, site plan demonstrating the mitigation can be implemented and a site wide management plan must be submitted with the planning application.

We advise that 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. The above 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 (BS 42020:2013, section 5.5).

There are areas of Ancient Woodland with the proposed development site and we draw the applicants attention to the revised 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. We are unable to comment on the wholly exceptional reasons (as these are planning related) but we highlight that a suitable compensation strategy must be submitted to enable SDC to fully consider the impact of the development on AW under the NPPF.

We note that for the previous application NVC surveys were carried out within the Woodlands – it's likely that the results of these surveys are still valid but this point must be discussed within the submitted ecological reports. We highlight 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.*

We highlight that the submitted site plans must demonstrate that a AW buffer of at least 15m is incorporated in to the proposed development.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:
EIA Scoping Report; CBRE; November 2018

Armstrong (Kent) LLP
C/O CBRE
Henrietta House
Henrietta Place
London
WIG 0NB

SE/15/00628/OUT
Valid on 10th March 2015

TOWN AND COUNTRY PLANNING ACT 1990

Town and Country Planning (Development Management Procedure) (England) Order 2015

GRANT OF OUTLINE PLANNING PERMISSION

- Site :** Fort Halstead Crow Drive Halstead Sevenoaks KENT TN14 7BU
- 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) with ancillary workshop space, 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).

Sevenoaks District Council, as the District Planning Authority, pursuant to powers in the above mentioned Act and Order, HEREBY GRANTS OUTLINE PLANNING PERMISSION for the development described above, to be carried out in accordance with the application and plans submitted therewith,

SUBJECT TO THE CONDITIONS set out below :-

- 1) For each phase of the development scheme referred to in condition 5 below, approval of details of the scale, layout and appearance of the proposed building(s) and the landscaping of the site (hereinafter called the "reserved matters") shall be obtained

from the Local Planning Authority in writing before any development in that phase is commenced.

In pursuance of section 92(2) of the Town and Country Planning Act 1990

2) Application for approval of the reserved matters shall be made to the District Planning Authority before the expiration of 10 years from the date of this permission.

No such details have been submitted and in pursuance of section 92(2) of the Town and Country Planning Act 1990.

- 3) The development to which this permission relates must be begun before:
- a. The expiration of five years from the date of this permission; or
 - b. In respect of any phase of the development to which Conditions 1 and 2 apply if and to the extent that applications for the approval of all reserved matters for that phase have been made before the expiration of 10 years from the date of this permission.

The development of the phase must be begun before the expiration of 2 years from the final approval of reserved matters.

No such details have been submitted and in pursuance of section 92(2) of the Town and Country Planning Act 1990.

4) For the purposes of this planning permission, any reference to 'the enabling works' relates to the following works only:

- (i) Demolition works to slab level undertaken in accordance with conditions 16, 17 and 22.
- (ii) Site investigation works to inform the site wide remediation strategy to be approved under condition 13.

For the purposes of clarification.

5) No development other than the enabling works shall take place until details of a scheme of phasing of the development providing an employment led scheme, has been submitted to and approved in writing by the Local Planning Authority. The development of phasing.

In accordance with policy EMP3 of the Allocations and Development Plan. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

6) For each phase of the submission of reserved matters applications pursuant to this outline application a 'Compliance Report' shall be submitted that states how the reserved matters comply with the approved parameter plans and Design principles at Appx 5.1 of the Environmental Statement submitted for the outline permission SE/15/00628 and the Design Brief and Design Code to be approved pursuant to condition 7 below.

To comply with the requirements of Policy EMP3 of the Allocations and Development Management Plan (ADMP) and to conserve and enhance the AONB, heritage assets and protect the character and openness of the Green Belt, in accordance with policies LO8,

SP1, SP2, SP3, SP5, SP7, SP8, SP9 and SP11 of the Core Strategy and policies EMP3, EN1, EN4, EN5, EN6, GB10 of the ADMP and the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

7) No development other than the enabling works shall take place until a Design Brief and Design Coding for the site, including the Residential Character Areas, Village Centre and Commercial Area, as set out in the Design and Access Statement and Parameter plans and Environmental Statement, has been submitted to and approved in writing by the Local Planning Authority. The detailed design principles within the Design Brief shall include details of:

- a. Constraints
 - b. Topography
 - c. Land use, including location of different community and other uses
 - d. Massing and building heights
 - e. Access and circulation
 - f. Parking
 - g. Public realm and amenity space
 - h. Layout
 - i. Appearance
 - j. Architectural, landscape and sustainable construction guidelines.
 - k. Existing and proposed levels
 - l. Renewable energy provision and a low carbon development scheme
 - m. A strategy for the mix, distribution and layout of the affordable housing provision.
 - n. A strategy for the layout of public open space including LEAPS and LAPS
 - o. A lighting strategy
 - p. Security and safety
 - q. A materials strategy
 - r. Power supply
 - s. Broadband internet provision
 - t. A strategy for the replacement, removal and retention of the existing security fencing
 - u. A strategy to minimise noise from the proposed new buildings for Qinetiq
 - v. Those parts of the site that are proposed to be adopted as public highway.
- No development shall be carried out otherwise than in accordance with the approved details.

To comply with the requirements of Policy EMP3 of the Allocations and Development Management Plan (ADMP) and to conserve and enhance the AONB, heritage assets and protect the character and openness of the Green Belt, in accordance with policies LO8, SP1, SP2, SP3, SP5, SP7, SP8, SP9 and SP11 of the Core Strategy and policies EMP3, EN1, EN4, EN5, EN6, GB10 of the ADMP and the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

8) The details submitted for reserved matters and pursuant to condition 7 above shall demonstrate compliance with the following criteria:

- a. Shall provide not less than 27 000 sqm for Class B floorspace.
- b. A maximum height of 16 metres for the Qinetiq replacement headquarters and all other commercial floorspace above existing ground levels.

c. A maximum height of 11.5 metres for the residential units above existing ground levels.

To comply with the requirements of Policy EMP3 of the Allocation and Development Management DPD and the National Planning Policy Framework.

9) No development other than the enabling works shall take place until a foul water drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved in writing by the Local Planning Authority in consultation. No discharge of foul water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. This is supported by policy EN1 of the Allocations and Development Plan and the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

10) No development other than the enabling works shall take place until details have been submitted to and approved in writing by the Local Planning Authority of:

- a. the detailed design of the sustainable drainage system for the site
- b. a management and maintenance plan for the sustainable drainage system
- c. details of the implementation timetable.

No development shall be carried out otherwise than in accordance with the approved details.

To minimise the risk of flooding and ensure the satisfactory means of surface water disposal using sustainable drainage methods for the lifetime of the development in accordance with paragraph 99 of the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

11) No development other than the enabling works shall take place until an impact study of the existing water supply infrastructure has been submitted to and approved in writing by the Local Planning Authority. The study should determine the magnitude of any new additional capacity required in the system and a suitable connection point a programme of implementation for any works. No development shall be carried out otherwise than in accordance with the approved scheme.

To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand. This is supported by policy EN1 of the Allocations and Development Plan and the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

12) No development other than the enabling works shall take place until a remediation strategy that includes the following components to deal with the risks associated with

contamination of the site have each been submitted to and approved, in writing, by the Local Planning Authority:

- a. A preliminary risk assessment which has identified:-
 - i. all previous uses
 - ii. potential contaminants associated with those uses
 - iii. a conceptual model of the site indicating sources, pathways and receptors
 - iv. potentially unacceptable risks arising from contamination at the site.
- b. A site investigation scheme, based on (a) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- c. The results of the site investigation and the detailed risk assessment referred to in (b) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- d. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (c) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. No development shall be carried out otherwise than in accordance with the approved details.

To protect public health and comply with policy SC1 of the Core Strategy and paragraphs 120 and 121 of the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

13) No development shall take place until a remediation strategy for the enabling works that includes the following components, to deal with the risks associated with contamination of the site have each been submitted to and approved, in writing, by the Local Planning Authority:

- a. A preliminary risk assessment which has identified:-
 - i. all previous uses
 - ii. potential contaminants associated with those uses
 - iii. a conceptual model of the site indicating sources, pathways and receptors
 - iv. potentially unacceptable risks arising from contamination at the site.
- b. A site investigation scheme for the areas of the enabling works, based on (a) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- c. The results of the site investigation for the areas of the enabling works and the detailed risk assessment referred to in (b) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- d. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (c) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. No development or enabling works shall be carried out otherwise than in accordance with the approved details.

To protect public health and comply with policy SC1 of the Core Strategy and paragraphs 120 and 121 of the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

- 14) No development shall take place until a scheme has been submitted to and approved in writing by the Local Planning Authority of:
- a. The road junction(s) splitting the residential associated traffic from the commercial associated traffic within the site.
 - b. Details of proposed speed limits, visibility splays, surfacing and signage around the commercial part of the site.
 - c. Details of how the Star Hill access will be restricted and maintained for use only by buses, emergency vehicles, cyclists, pedestrians and horses.
 - d. A programme of implementation.
- No development shall be carried out otherwise than in accordance with the approved plans and details.

In the interests of Highway Safety as supported by T1 of the Allocations and Development Management Plan and the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

- 15) No development other than the enabling works shall take place until details of the following has been submitted to and approved in writing by the Local Planning Authority:
- a. a public recycling facility,
 - b. a layby and hardstanding for the facilities,
 - c. a timetable for the implementation of the works.
- No development shall be carried out other than in accordance with the approved details and timetable.

To contribute to the sustainability of the development as supported by policy SP2 of the Core Strategy and the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

- 16) No development shall take place until a method statement for the salvage, secure storage and re-use of items of historic interest including;
- a. original street lamps,
 - b. other street furniture, building numbers,
 - c. street name signs,
 - d. the red information board outside the M series/Bunkers,
- has been submitted to and approved in writing by the Local Planning Authority. No development shall be carried out other than in accordance with the approved method statement.

To preserve the heritage and historical importance of the site in accordance with policy EN4 and EMP3 of the Allocations and Development Management Plan and paragraph 128 of the National Planning Policy Framework. The Local Planning Authority is satisfied

that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

17) No development shall take place until methodology for recording the architecture and / or archaeology buildings prior to and during demolition has been submitted to and approved in writing by the Local Planning Authority. No demolition shall be carried out other than in accordance with the approved methodology and the records or reports shall be stored in accordance with the approved methodology.

To preserve the heritage and historical importance of the site in accordance with policies EMP3 and EN4 of the Allocations and Development Management Plan and paragraph 141 of the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

18) No development shall take place within 15m of the Ancient Woodland until a methodology has been submitted to and approved in writing by the Local Planning Authority to:

a. Details of how the ancient woodland will be protected during the development including the provision of a 15 metre buffer.

These details shall include a timescale for implementation. The works shall be carried out in accordance with the approved details.

To protect existing planting on site and to preserve the visual appearance of the area as supported by SP11 of the Core Strategy and EN1 of the Sevenoaks Allocations and Development Management Plan. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

19) No development shall take place within 15m of the Ancient Woodland until a methodology has been submitted to and approved in writing by the Local Planning Authority to:

a. Detail how the ancient woodland would be managed

b. Detail how the public access to the ancient woodland would be managed

These details shall include a timescale for implementation. No development shall be carried out other than in accordance with the approved details.

To protect existing planting on site and to preserve the visual appearance of the area as supported by SP11 of the Core Strategy and EN1 of the Sevenoaks Allocations and Development Management Plan. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

20) No development shall take place until a demolition and construction environmental management plan (CEMP) for that Phase has been submitted to and approved in writing by the Local Planning Authority and thereafter implemented and maintained throughout the construction period in accordance with the approved CEMP. The CEMP shall include:

a. Details of the proposed working hours

b. Details of the design and location of the construction access;

- c. Details of proposed wheel washing facilities located adjacent the construction site access
- d. Details of an area for the storage of materials, parking for construction traffic and an appropriate turning area to be provided within the site clear of the public highway
- e. A site waste management plan
- f. Details of temporary utilities
- g. How the construction will comply with the sustainable use of soils on construction sites
- h. Details of a communication strategy to include the provision of a dedicated phone line for residents to contact the site manager directly with complaints which should be manned whenever site works are in progress.
- i. Details of a routing agreement for the site construction traffic and HGV traffic associated with the movement of bulk material to and from the site
- j. Details of means of suppressing dust during the construction process to include the regime for dust deposition measurement at the site boundaries;
- k. Details of the measures to mitigate the noise and vibration from construction
- l. Details of a surface water drainage scheme for the temporary drainage of the Site.

In the interests of highway safety and the amenities of neighbouring dwellings as supported by policies T1 and EN1 of the Allocations and Development Management Plan and the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

21) No development shall take place until a Landscape and Ecological Management Plan, in accordance with the principles contained in the Outline Landscape and Ecological Management Plan submitted in July 2015 of application SE/15/00628 has been submitted to and approved in writing by the Local Planning Authority. The Landscape and Ecological Management Plan (LEMP) shall provide the overarching approach to landscape and ecological management, and shall include details of the ecological mitigation measures to be delivered during the development and during the enabling works, and shall include the following details:

- a. Description and evaluation of features to be managed;
- b. Aims and measurable objectives of management;
- c. Appropriate management prescriptions for achieving aims and objectives;
- d. Preparation of a work schedule (including an annual work plan capable of being rolled forward over the duration of the Plan);
- e. Ongoing habitat and species monitoring provision against measurable objectives;
- f. Procedure for the identification, agreement and implementation of contingencies and/or remedial actions where the monitoring results show that the objectives are not being met;
- g. Details of the body/ies or organisation/s responsible for implementation of the plan.

No development shall take place otherwise than in accordance with the approved details.

To ensure that the proposed development will not have a harmful impact on landscape and ecology, and will enhance the wider biodiversity, in accordance with policies EN1 of the Sevenoaks Allocations and Development Management Plan, SP11 of the Core Strategy and guidance in National Planning Policy Framework 2012. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this

issue before development commences and that without this safeguard planning permission should not be granted.

22) No development shall take place until a building retention and demolition management plan has been submitted for and approved in writing by the Local Planning Authority in accordance with the building retention and demolition management plan. This shall include:

- a. identify all buildings to be retained on site, including at least two air raid shelters and buildings A1 and A3 and
- b. the means for their protection and
- c. the details of a demolition management strategy.

All buildings to be retained shall be so retained in accordance with the approved details and no demolition shall be carried out otherwise than in accordance with the approved details.

To preserve the historic site and its designated and non designated heritage assets as supported by Policy EN4 of the Sevenoaks Allocations and Development Management Plan and paragraph 128 of the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

23) For each phase of the submission of the reserved matters, the details submitted in connection with the reserved matters shall include, for each phase of the development above slab level, a noise report indicating how noise levels from any part of the site occupied by Qinetiq can be controlled so that noise levels do not exceed 55dba in the outdoor amenity areas across the site. No development shall be carried out otherwise than in accordance with the approved details.

To conserve and enhance the natural beauty of the Kent Downs AONB, and to protect the amenity of future users and occupiers of the site, including residents. This is in accordance with policies EN5 and EN2 of the Allocations and Development Management Plan. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

24) No development shall take place until details have been submitted to and approved in writing by the Local Planning Authority of a strategy to implement the recommendations of the Slope Stability Assessment submitted for application SE/15/00628. The strategy shall include:

- a. Details of a watching brief for solution cavities and voids.
- b. Details of those parts of the site where ground levels should not be increased.
- c. Details of those parts of the site where new foundations should not be placed.
- d. Details of those parts of the site where the existing natural drainage needs to be protected.
- e. Details of the temporary support or battering works required during any excavation or filling works.
- f. Details of a programme for monitoring and assessment of slope stability across the site during the construction process.
- g. Details of an implementation timetable.

No development shall be carried out otherwise than in accordance with the approved details.

To protect the stability of the site as supported by Policy SP2 of the Core Strategy and Policy EN4 of the Sevenoaks Allocations and Development Management Plan and paragraphs 120 and 121 of the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

25) Prior to commencement of any works to the Scheduled Ancient Monument details shall be submitted to, and be approved in writing by the Local Planning Authority of any proposed landscaping works, including the removal of trees within the curtilage of the Scheduled Ancient Monument. No development will be carried out otherwise than in accordance with the approved details.

To preserve the historic significance of the Scheduled Ancient Monument as supported by Policy EN4 of the Sevenoaks Allocations and Development Management Plan and the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

26) Before each phase of development identified pursuant to condition 5 is commenced a detailed Construction Environmental Management Plan: Biodiversity (CEMP: Biodiversity) for that phase shall be submitted to, and approved in writing by, the Local Planning Authority. The content of the CEMP: Biodiversity shall adhere to and support the principles of the approved overarching Landscape and Ecological Management Plan, shall be in accordance with the Outline CEMP and shall include the following:

- a. Risk assessment of potentially damaging construction activities;
- b. Identification of "biodiversity protection zones", including the use of protective fences, exclusion barriers and warning signs;
- c. Practical measures informed by further ecological surveys (both physical measures and sensitive working practices) to avoid or reduce ecological impacts during construction (may be provided as a set of method statements);
- d. The times during construction when specialist ecologists need to be present on site to oversee works;
- e. Responsible persons and lines of communication;
- f. The role and responsibilities on site of an ecological clerk of works (ECow) or similarly competent person.

No development shall be carried out other than in accordance with the approved details.

To ensure that the proposed development will not have a harmful impact on landscape and ecology, and will enhance the wider biodiversity, in accordance with policies EN1 of the Sevenoaks Allocations and Development Management Plan, SP11 of the Core Strategy and guidance in National Planning Policy Framework 2012. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

27) Before each phase of development identified pursuant to condition 5 is commenced details of all trees / bushes / hedges to be retained within (and immediately adjacent to) each phase shall be protected by a fence erected in accordance with the

guidance contained in BS 5837:2005 and maintained during the course of development within that phase. Within the protection areas erected in accordance with the guidance contained in BS 5837:2012 the existing ground level shall neither be raised nor lowered and no materials, temporary buildings, plant, machinery or surplus soil shall be placed or stored within such areas without the prior written approval of the Local Planning Authority. If any trenches for services are required in the fenced off areas they shall be excavated and backfilled by hand and any tree root encountered with a diameter of 25mm or more shall be left unsevered unless otherwise agreed in writing by the Local Planning Authority.

To protect existing planting on site and to preserve the visual appearance of the area and the existing trees on site as supported by EN1 of the Sevenoaks Allocations and Development Management Plan. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

28) Before each phase of development identified pursuant to condition 5 is commenced the details submitted pursuant to reserved matters shall include the following details:

- a. any proposed access road(s) including details of horizontal and vertical alignment
- b. the layout, specification and construction programme for:
 - i. any internal roads not covered by (a) above
 - ii. footpaths
 - iii. parking and turning areas (including visibility splays)
 - iv. cycle parking areas and
 - v. cycle storage facilities;
- c. For the landscaping scheme:
 - i. Location of existing trees, hedges, shrubs and other vegetation.
 - ii. The layout, character, structure and types of the proposed planting, together with an indicative schedule of planting species.
 - iii. The layout and character of the proposed hard surfacing areas together with an indicative schedule of materials.
 - iv. Details of any earthworks proposed, contours to be formed and representative cross/long-sections and
 - v. Location of lighting for roads, footpaths and other areas.

The reserved matters for landscaping details shall show integration with the other reserved matters.

In the interests of highway safety and the amenities of neighbouring dwellings as supported by policies T1 of the Allocations and Development Management Plan and the National Planning Policy Framework. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

29) Before each phase of development identified pursuant to condition 5 is commenced the details submitted in connection with the reserved matters shall include measures to minimise the risk of crime. No development shall take place until details of such measures, corresponding to that phase, according to the principles and physical security requirements of Crime Prevention through Environmental Design (CPTED) have been submitted to and approved in writing by the Local Planning Authority. The

development shall not be occupied before the approved measures have been implemented and thereafter retained.

To create a safe and secure environment for residents as supported by policy EN1 of the Allocations and Development Management Plan and the National Planning Policy Framework.

30) Before each phase of development identified pursuant to condition 5 is commenced the details submitted in connection with the reserved matters shall include the following details: a plan for the installation of electric vehicle charging points showing their proposed locations, type and specifications, and how they would relate to the access and layout of the scheme shall be submitted to and approved by the Local Planning Authority. No development shall be carried out otherwise than in accordance with the approved plans.

To ensure the sustainability of the site in accordance with policy T3 of the Allocations and Development Management Plan.

31) Before each relevant phase of development identified pursuant to condition 5 is commenced a scheme for the provision of secure cycle storage facilities shall be submitted to and improved in writing by the Local Planning Authority. No development shall be carried out otherwise than in accordance with the approved details.

To ensure the sustainability of the site in accordance with policy SP2 of the Core Strategy and EMP3 of the Allocations and Development Management Plan.

32) Before each phase of development identified pursuant to condition 5 is commenced the details submitted pursuant to reserved matters shall include details for internal and/or external spaces for the storage of recyclable materials for all buildings. No development shall be carried out otherwise than in accordance with the approved details.

To ensure the sustainability of the site in accordance with policy SP2 of the Core Strategy and EMP3 of the Allocations and Development Management Plan.

33) Before each phase of development identified pursuant to condition 5 is commenced no development shall take place until a written scheme of archaeological investigation has been submitted to and improved in writing by the Local Planning Authority. No development shall take place other than in accordance with the programme of archaeological work provided for in the written scheme of investigation. No development may take place in any area which is identified in the scheme of investigation (or by the work provided for by that scheme) as requiring a programme of archaeological investigation work until that programme has been completed in accordance with the scheme of investigation.

To investigate and record archaeological features as supported by Policy EN4 of the Sevenoaks Allocations and Development Management Plan and paragraph 128 of the National Planning Policy Framework.

34) Before each phase of development identified pursuant to condition 5 is commenced the details submitted pursuant to reserved matters shall include a strategy

and design for street furniture which shall include, street lighting, waste bins, seating and any non-highway signage. This shall include a programme of implementation. The strategy and programme of implementation shall be submitted to and approved in writing by the Local Planning Authority. No development shall be carried out otherwise than in accordance with the approved details.

To ensure good design and contribute to the character of the development as supported by policies EN1 and EMP3 of the Allocations and Development Management Plan.

35) Before each phase of development identified pursuant to condition 5 is commenced details of the boundary treatment for each phase shall be submitted to and approved in writing by the Local Planning Authority. These details shall include a plan indicating the positions, design, height, materials and type of boundary treatment to be erected in accordance with the design brief and design coding approved pursuant to condition 7 and details of a timetable for their implementation. No development shall be carried out otherwise than in accordance with the approved details.

In the interests of visual amenity and the amenity of residents in accordance with policies EN1 and EN2 of the Allocations and Development Management Plan.

36) Before each phase of development identified pursuant to condition 5 is commenced the details submitted pursuant to reserved matters shall include details of hard and soft landscaping in accordance with the design brief and design coding approved pursuant to condition 7 shall be submitted for approval in writing by the Local Planning Authority. These details shall include:

- a. Planting plans, including plants to be retained and new plants
- b. Written specifications including cultivation and other operations associated with plant and grass establishment.
- c. Schedules of new plans including species, size, stock at time of planting, and proposed densities
- d. A programme of implementation.

No development shall be carried out otherwise than in accordance with the approved details. If within a period of 10 years from the completion of the relevant phase any trees or plants that form part of the approved details are removed or become seriously damaged or diseased, they shall be replaced in the next planting season with others of similar size and species.

To ensure that the proposed development will conserve and enhance the landscape and ecology, and biodiversity, in accordance with policies EN1 of the Sevenoaks Allocations and Development Management Plan, SP11 of the Core Strategy and guidance in National Planning Policy Framework 2012. The Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

37) Before each phase of development identified pursuant to condition 5 is commenced the details submitted in connection with the reserved matters shall include a scheme for the construction of play equipment for Locally Equipped Area of Play (LEAPS) and Local Area of Play (LAP). This scheme shall include a programme of implementation. The scheme and programme of implementation shall be submitted to and approved in writing by the Local Planning Authority. No development shall be carried out otherwise than in accordance with the approved details.

In the interests of the amenities of future residents as supported by policy EN2 of the Allocations and Development Management Plan and paragraph 73 of the National Planning Policy Framework.

38) Before each phase of development identified pursuant to condition 5 is commenced a scheme and programme of implementation shall be submitted of all proposed vehicular accesses, driveways and turning areas that serve residential units shall be submitted to and improved by the Local Planning Authority in consultation with the Local Highway Authority. No development shall be carried out otherwise than in accordance with the approved scheme and programme of implementation.

In the interests of highway safety and convenience in accordance with policies T2 and EMP3 of the Allocations and Development Management Plan.

39) Before each phase of development identified pursuant to condition 5 is first occupied details of a scheme for external lighting and a programme of implementation shall be prepared in accordance with the details contained in the approved LEMP shall be submitted to and approved in writing by the Local Planning Authority. No development shall be carried out otherwise than in accordance with the approved details.

To control light pollution, protect the amenities of the local area and ecology in accordance with policies EN1 and EN6 of the Allocations and Development Management Plan, SP11 of the Sevenoaks Core Strategy and the National Planning Policy Framework.

40) Before each phase of development identified pursuant to condition 5 is commenced a detailed Landscape and Ecological Management Plan (LEMP) for that phase shall be submitted to, and approved in writing by, the Local Planning Authority. Each detailed Landscape and Ecological Management Plan shall be written in accordance with the approved overarching Landscape and Ecological Management Plan and shall include details of the ecological mitigation measures to be delivered during the specified phase of the development. Where different from and/or additional to the overarching Landscape and Ecological Management Plan, the detailed Landscape and Ecological Management Plans shall include the following:

- a. Description and evaluation of features to be managed;
 - b. Aims and measurable objectives of management;
 - c. Appropriate management prescriptions for achieving aims and objectives;
 - d. Preparation of a work schedule (including an annual work plan capable of being rolled forward over the duration of the Plan);
 - e. Ongoing habitat and species monitoring provision against measurable objectives;
 - f. Procedure for the identification, agreement and implementation of contingencies and/or remedial actions where the monitoring results show that the objectives are not being met;
 - g. Details of the body/ies or organisation/s responsible for implementation of the plan.
- No development shall be carried out otherwise than in accordance with the approved details.

To ensure that the proposed development will not have a harmful impact on landscape and ecology, and will enhance the wider biodiversity, in accordance with policies EN1 of the Sevenoaks Allocations and Development Management Plan, SP11 of the Core Strategy and guidance in National Planning Policy Framework 2012. The Local Planning

Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard planning permission should not be granted.

41) Before each phase of development identified pursuant to condition 5 is first occupied a verification report demonstrating completion of works set out in the approved remediation strategy approved pursuant to condition 12 and the effectiveness of the remediation shall be submitted to and approved, in writing, by the Local Planning Authority. The report shall include;

- a. results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.
- b. any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan.

No development shall be carried out otherwise than in accordance with the approved details.

To protect human health and to comply with paragraphs 120 and 121 of the National Planning Policy Framework.

42) No impact piling shall take place until a piling method statement which includes;a. detailing the depth and type of piling to be undertaken, b. the methodology by which such piling will be carried out, c. measures to prevent and minimise the potential for damage to subsurface water infrastructure, shall be submitted to and approved in writing by the Local Planning Authority. No development shall take place otherwise than in accordance with the approved details.

The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. This is in accordance with paragraph 99 of the National Planning Policy Framework.

43) No road or footway that is to be an adopted public highway shall be constructed as part of the development without having first entered into an agreement with the Local Highway Authority pursuant to a Section 38 and/or Section 278 Agreement of the Highways Act 1980 in respect of that road or footway.

In the interests of highway safety in accordance with policy T1 of the Allocations and Development Management Plan.

44) All non-residential buildings shall be constructed in accordance with a specification to be submitted for approval to and approved in writing by the Local Planning Authority. The specification shall include a commitment to build to a BREEAM 'very good' certification, or such equivalent scheme and standard that shall operate at the time of construction of that building. No development shall be carried out otherwise than in accordance with the approved details.

To ensure a high standard of sustainable development in accordance with Policies SP2 of the Sevenoaks Core Strategy and the National Planning Policy Framework.

45) If, during development, contamination not previously identified is found to be present at the site then the Local Planning Authority must immediately be notified in

writing and (unless otherwise agreed in writing with the Local Planning Authority) no further development within the relevant phase shall be carried out until a supplementary remediation strategy detailing how this unsuspected contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. No development shall be carried out otherwise than in accordance with the approved details.

To ensure that any possible land contamination related to historic site activities is addressed in line with current planning guidance. The site is located on a principal aquifer and has a history of use as a laboratory for weapons testing.

46) No infiltration of surface water drainage into the ground at the site is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. No development shall be carried out otherwise than in accordance with the approval details.

To protect groundwater, ecosystems and human health in compliance with paragraphs 120 and 121 of the National Planning Policy Framework.

47) No noise generating machinery (other than any plant forming part of the building services comprised in the development and approved in accordance with this permission) shall be operated on the premises outside the following hours:- 0800 - 1900 Mondays - Fridays 0900 - 1700 Saturdays and not at all on Sundays or Public Holidays'.

To conserve and enhance natural beauty (relative tranquillity) of the Kent Downs AONB, the biodiversity and landscape setting of the site, and to protect the amenity of future users and residents of the site. This is in accordance with policies EN5 and EN2 of the Sevenoaks Allocation and Development Management Plan and the National Planning Policy Framework.

48) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 no external storage shall be carried out (excluding all residential units and their curtilages) without the prior consent in writing of the Local Planning Authority.

To enable the Local Planning Authority to retain control over future development given the location of the site in an AONB. In accordance with policies EN1, EN4 and EMP3 of the Sevenoaks Allocations and Development management Plan and the National Planning Policy Framework.

49) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015, (or any order revoking, re-enacting or modifying that Order), the premises first built and occupied for uses falling within Classes A1-A3, D1, D2 and those falling within Classes B of the Schedule to the Town and Country Planning (Use Classes) Order 1987 shall only be used for those purposes and no other purpose (including any other purpose falling within the same Use Class of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

To enable the Local Planning Authority to retain control over future development given the location of the site in an AONB and the policy requirement for an employment led scheme. In accordance with policies EN1, EN4 and EMP3 of the Sevenoaks Allocations and Development management Plan and the National Planning Policy Framework.

50) The development hereby permitted shall be carried out in accordance with the following approved plans:-

- Figure 5.1 00556A_PP_01 Land Use revision P5
- Figure 5.2 00556A_PP_02 Residential Density revision P5
- Figure 5.3 00556A_PP_03 Proposed Building Heights revision P5
- Figure 5.4 00556A_PP_04 Access and Movement revision P6
- Figure 5.5 00556A_PP_05 Green Infrastructure revision P6
- Figure 5.6 00556A_PP_06 Demolition Plan revision P2
- Letter dated 27.7.15 from Waterman
- Environmental Statement and appendices and figures and non-technical summary
- Site location plan 00556A SV 01 Rev P1
- 26582/001/001 Star Hill access
- 26582 / 001 / 001B Star Hill Road access visibility splay.
- 26582 / 001 / 008D A224 Polhill / Otford Lane Junction Improvements
- 26582 / 001 / 030 Fort Halstead Roundabout option and pedestrian and cycle provision
- 5.1 Design Principles of Appendix 5.1 of the Environmental Statement
- Illustrative Masterplan 00556A S 01 revision P6 (with retention of Buildings A1 & A3)
- Design and Access Statement
- Planning Statement
- Employment report
- AONB report
- Statement of Community Involvement
- Sustainability Statement
- Energy Statement
- Utilities statement / Strategy
- Land Stability Report
- Lighting Assessment

For the avoidance of doubt and in the interests of proper planning.



Richard Morris
Chief Planning Officer

DATED THIS: 30th day of December 2015

Note to Applicant

In accordance with paragraphs 186 and 187 of the NPPF Sevenoaks District Council (SDC) takes a positive and proactive approach to development proposals. SDC works with applicants/agents in a positive and proactive manner, by;

- Offering a duty officer service to provide initial planning advice,
- Providing a pre-application advice service,
- When appropriate, updating applicants/agents of any small scale issues that may arise in the processing of their application,
- Where possible and appropriate suggesting solutions to secure a successful outcome,
- Allowing applicants to keep up to date with their application and viewing all consultees comments on line (www.sevenoaks.gov.uk/environment/planning/planning_services_online/654.asp),
- By providing a regular forum for planning agents,
- Working in line with the NPPF to encourage developments that improve the improve the economic, social and environmental conditions of the area,
- Providing easy on line access to planning policies and guidance, and
- Encouraging them to seek professional advice whenever appropriate

In this instance the applicant/agent:

- 1) Was updated on the progress of the planning application.

INFORMATIVES

- 1 With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. This is required in order to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

- 2 The application form indicates that soakaways, ponds and sustainable urban drainage techniques will be used. The following points should be noted wherever soakaways or infiltration devices are proposed at a site:
 - Appropriate pollution prevention methods (such as trapped gullies or interceptors) should be used to prevent hydrocarbons draining to ground from roads, hardstandings and car parks. Clean uncontaminated roof water should drain directly to soakaways entering after any pollution prevention methods.
 - No soakaway or infiltration device should be sited in or allowed to discharge into land impacted by contamination or land previously identified as being contaminated.
 - There must be no direct discharge to groundwater, a controlled water. An unsaturated zone must be maintained throughout the year between the base of soakaways and the water table.
 - Normally we advise that a series of shallow soakaways are preferable to deep bored soakaways, as deep bored soakaways can act as conduits for rapid transport of contaminants to groundwater. However, there is a significant unsaturated zone at this site and therefore this may not be as relevant.
 - Any potential surface water drainage should refer to the contamination reports to ensure that the drainage isn't located in land which could have been impacted by contamination.

- 3 Fuel, Oil and Chemical Storage
 - Any facilities for the storage of oils, fuels or chemicals shall be provided with secondary containment that is impermeable to both the oil, fuel or chemical and water, for example a bund, details of which shall be submitted to the local planning authority for approval. The minimum volume of the secondary containment should be at least equivalent to the capacity of the tank plus 10%. If there is more than one tank in the secondary containment the capacity of the containment should be at least the capacity of the largest tank plus 10% or 25% of the total tank capacity, whichever is greatest. All fill points, vents, gauges and sight gauge must be located within the secondary containment.
 - The secondary containment shall have no opening used to drain the system. Associated above ground pipework should be protected from accidental damage. Below ground pipework should have no mechanical joints, except at inspection hatches and either leak detection equipment installed or regular leak checks. All fill points and tank vent pipe outlets should be detailed to discharge downwards into the bund.

- 4 The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice:
 - excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
 - treated materials can be transferred between sites as part of a hub and cluster project
 - some naturally occurring clean material can be transferred directly between sites.

- Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, we should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to :

- The position statement on the Definition of Waste: Development Industry Code of Practice and;
- Our website at www.gov.uk/environment-agency for further guidance

5 Contaminated soil that must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, we should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12 month period the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/environment-agency for more information.

6 It is the responsibility of the applicant to ensure , before the development hereby approved is commenced, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

7 The proposed development has been assessed and it is the Council's view that the CIL IS PAYABLE.

Please remove any site notice that was displayed on the site pursuant to the application.



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

Highways and Transportation
Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD
Tel: 03000 418181
Date: 19 December 2018

Application - SE/PA/18/00488

Location - Fort Halstead, Star Hill Road, Dunton Green, KENT TN14 7BP

Proposal - Request for a 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.

Dear Claire

Thank you for your consultation in relation to the above.

It is requested that a Transport Assessment and Travel Plan are prepared and submitted as part of the planning application for the site to assess the impact of the proposal on the local highway network.

Yours faithfully

Louise Rowlands
Principal Transport & Development Planner



Claire Shearing
Sevenoaks District Council
Council Offices
Argyle Road
Sevenoaks
Kent
TN13 1HG

Flood and Water Management

Invicta House
Maidstone
Kent
ME14 1XX

Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: SEDC/2018/070732
Date: 11 December 2018

Application No: PA/18/00488

Location: Fort Halstead, Star Hill Road, Dunton Green KENT TN14 7BP

Proposal: Request for a 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

Thank you for your consultation on the above referenced planning application.

Kent County Council as Lead Local Flood Authority have the following comments:

We have reviewed the scoping report for the proposed redevelopment and note that on page 26 it stated that the topic of flood risk is to be scoped in to the proposed Environmental Impact Assessment, as part of this we will expect for a Flood Risk Assessment to be undertaken.

Whilst we have no preference whether the Flood Risk Assessment forms part of an EIA or is a standalone document, it should include a Surface Water Management Strategy to adequately demonstrate how surface water will be managed within the development.

We would refer the applicant to our Drainage and Planning Policy Statement (available at www.kent.gov.uk/flooding) for further information and advice on how we review planning submissions for major development.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

Alex Brauning
Senior Flood Risk Project Officer
Flood and Water Management

From: Nicky.Biddall@kent.gov.uk
Sent: Tue, 18 Dec 2018 13:51:39 +0000
To: Claire Shearing;DC North;Sarah Cottingham;Alison Salter;Planning Comments
Subject: FW: PA/18/00488 - Fort Halstead Scoping Opinion

Sorry just realised the updated 2018 NPPF now says:

98. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

So my final paragraph should be amended to say that .

Kind regards,

Nicky Biddall | Public Rights of Way Officer- Maintenance, protection and community delivery | Public Rights of Way and Access Service | Public Protection | Environment, Planning and Enforcement | Growth, Environment and Transport | Kent County Council | West Kent PROW Office, 8 Abbey Wood Road, Kings Hill, West Malling, ME19 4YT | Telephone 03000 41 40 89 | Mobile 07740 186045

From: Biddall, Nicky - GT EPE
Sent: 18 December 2018 13:22
To: 'Claire Shearing' <Claire.Shearing@sevenoaks.gov.uk>; 'dc.north@sevenoaks.gov.uk' <dc.north@sevenoaks.gov.uk>; 'Sarah Cottingham' <Sarah.Cottingham@sevenoaks.gov.uk>; 'Alison Salter' <Alison.Salter@sevenoaks.gov.uk>; 'Planning Comments' <planning.comments@sevenoaks.gov.uk>
Subject: RE: PA/18/00488 - Fort Halstead Scoping Opinion

Dear Claire,

Having reviewed the consultation document for this development I note that whilst public rights of way are not specifically identified as key receptors to be scoped in in Section 3, they are mentioned under Landscape and Visual Effects in Section 5:26 ' The original LVIA found that the completed development would improve the visual amenity and character of the site. In particular, the character of the Darent Valley to the south and the visual amenity of adjacent Public Rights of Way that are currently dominated by the perimeter security fencing would be significantly improved.'

I would suggest that as the housing numbers are significantly increased in this application that 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 also needs to be measurement of any enhancement features to be proposed/undertaken. I would therefore request a new LVIA be undertaken.

I cannot comment on the receptor locations as the previous map showing them is not included with this consultation, only verbal descriptions.

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. It's position can be viewed on the Natural England website under CRoW and Coastal Access Maps.

If this redevelopment goes ahead then I would welcome any improvement to the public rights of way network, 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 this office.

The National Planning Framework says under Promoting Healthy Communities: '75. Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.'

Kind regards,

Nicky Biddall | Public Rights of Way Officer- Maintenance, protection and community delivery | Public Rights of Way and Access Service | Public Protection | Environment, Planning and Enforcement | Growth, Environment and Transport | Kent County Council | West Kent PROW Office, 8 Abbey Wood Road, Kings Hill, West Malling, ME19 4YT | Telephone 03000 41 40 89 | Mobile 07740 186045

From: Claire Shearing <Claire.Shearing@sevenoaks.gov.uk>
Sent: 18 December 2018 10:54
To: DC North <dc.north@sevenoaks.gov.uk>
Cc: Sarah Cottingham <Sarah.Cottingham@sevenoaks.gov.uk>; Alison Salter <Alison.Salter@sevenoaks.gov.uk>
Subject: FW: PA/18/00488 - Fort Halstead Scoping Opinion

Dear Consultee

DRA Fort Halstead, Otford Lane, Halstead

Scoping Opinion in respect of:

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.

Reference PA/18/00488

We have yet to receive any comments from you following our consultation request of 27th November which sought your comments on the Scoping Opinion submitted in relation to the above mentioned development. The Scoping process is our opportunity to inform the developer of the extent of issues that should be considered in their Environmental Impact Assessment which will be submitted with their planning application.

The consultation period expires today. However, if you wish to make comments on the scoping document please forward these to planning.comments@sevenoaks.gov.uk not later than Friday 21st December. After this time we may not be able to include your comments in our response to the developer.

The consultation document is available at this link:

<https://cbftp.cbre.com/download?p=vls4vyeC8VW7kByXrqFIJeo6m1mWev%2bqXFx1deqsiQlc%2fkdg1lVdQW5g%2bhCHmnjaRBGg6jmHl%2fj4uXxjbRfSvp1fC%2fb%2bjKMLxNBwF%2fTplEHyVuNUNib5CWZRKV6lackIDGpj4MFJWyoU7l1%2fmJczbC5rZygcVCaLmJXjbxdkFrs%3d>

Please do not hesitate to contact me if you have any queries or would like to discuss.

Kind Regards, Claire Shearing

Claire Shearing MRTPI

Principal Planner (Development Control Planning)

Sevenoaks District Council | Argyle Road | Sevenoaks | TN13 1HG

Please note I do not work on Wednesdays.

Tel: 01732 227 367

Email: Claire.Shearing@sevenoaks.gov.uk

Online: www.sevenoaks.gov.uk

Please note that advice is provided at officer level and in no way prejudices any future determinations made by the Local Planning Authority.

From: DC North
Sent: 28 November 2018 12:35
To: Claire Shearing
Subject: PA/18/00488 - Fort Halstead Scoping Opinion

Dear Sir/Madam,

Re. PA/18/00488 - Fort Halstead EIA Scoping Opinion

I am emailing following our consultation request to you for the EIA Scoping Opinion for the Fort Halstead site in Halstead, Kent (our reference above).

Our original consultation to you was sent on the 23 November 2018. Unfortunately this consultation contained the incorrect proposal description. As such, please disregard this consultation.

We have re-consulted with you on the 27th November 2018. This contains the correct proposal description, which we confirm is as follows:

“Request for a 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.”

The consultation letter included a link to CBRE’s drop-box facility. This is due to expire on the 30th November. Due to this, they have updated the link as follows:

<https://cbftp.cbre.com/download?p=oDCNSmzdIHfdpRDrN6B6X7Qfq0VJI%2fSwtgVzDK7Y54WyGQ4tdJQA0aulF6Di495BX5ARWvT8JotzcFqguinUdlZRbVselO2pNyrvh0ThoJn0eT2USFKnmsCApSpTuA6eMZci8wpUiXxPOoH6SN7v87pX7clk1TXDYfm2smoAtaQ%3d>

This link will expire in 10 days of this email and I would advise downloading the document upon receipt of this email.

The new correct consultation request has a deadline for any comments to be received by the 18th December 2018.

Kind Regards,

Sarah Cottingham

Senior Planning Officer

Sevenoaks District Council | Argyle Road | Sevenoaks | Kent | TN13 1HG

01732 227000

sarah.cottingham@sevenoaks.gov.uk

www.sevenoaks.gov.uk

This advice is without prejudice to the decision making processes of the local planning authority which considers the views of all those consulted on planning applications and in no way prejudices any future determinations or decisions made by the local planning authority.

You are advised to seek your own independent advice on any issues raised in this email.

Debit/credit card payments for planning applications, pre-application enquiries and Appeals can be made online at our website.

<https://myaccount.sevenoaks.gov.uk/planning-payment/> For all other Planning payment queries please telephone us on 01732 227000 or email planning.information@sevenoaks.gov.uk Our office hours are Monday - Thursday 08:45 -17:00 and Friday 08:45 - 16:45

Christmas waste collections

This Christmas, you won't miss out on a waste and recycling collection, but there may be changes to your usual collections days.

Click [here](#) to view your festive collection days

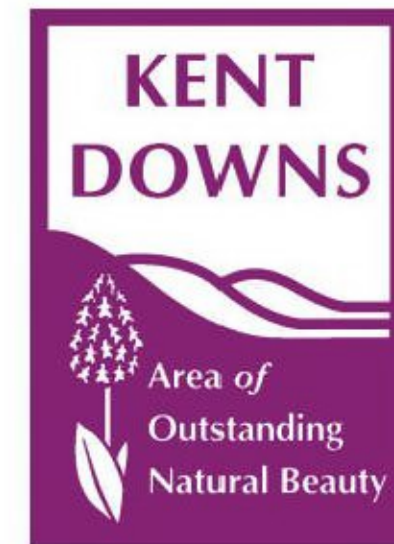


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Claire Shearing
Principal Planning Officer
Sevenoaks District Council



Kent Downs
AONB Unit
West Barn
Penstock Hall
Farm
Canterbury
Road
East
Brabourne

Sent by email to:
Claire.shearing@sevenoaks.gov.uk
DC.North@sevenoaks.gov.uk

26 November 2018

Dear Claire

Application: PA/18/00488

Fort Halstead, Star Hill Road, Dunton Green, Kent

Request for a Scoping Opinion for an EIA for the redevelopment of Fort Halstead including:

- **Up to 540 residential units**
- **Up to 27,000sqm business area**
- **Hotel of up to 80 beds**
- **Village Centre**
- **Use of Fort Area and bunkers as an historic interpretation centre**

I write with reference to the above application for an EIA scoping opinion. The following comments are from the Kent Downs AONB Unit and as such are at an officer level and do not necessarily represent the comments of the whole AONB partnership. The legal context of our response and list of AONB guidance is set out as Appendix 1 below.

We note that the above description refers to 540 dwellings, however have assessed the proposal on the basis of the description in the Scoping Report, i.e. 750 residential units.

The AONB Unit agrees with the assessment of the applicant that that the proposal falls within Schedule 2 of the 2017 EIA Regulations, due to the scale of the development and that in view of the potential for significant environmental impacts, an Environmental Statement (ES) will be required.

Given the scale of the development and the fact that the site lies wholly within the AONB, we consider that the ES 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

Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
Chichester Harbour
Chilterns
Clwydian Range
Cornwall
Cotswolds
Gower
Cranbourne Chase and
West Wiltshire Downs
Dedham Vale
Dorset
East Devon
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of



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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 ES.

The AONB agrees that the ES should include a full Landscape and Visual Impact Assessment and agrees with the proposed methodology. We also agree that a Lighting and Night Time Assessment should also be undertaken as part of the ES. It will be important for this 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 the provision of Green Infrastructure within the site may assist in ensuring pressure for recreational and leisure use on a regular and daily 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 an increase in people using the AONB for recreational purposes, the impacts of which need to be assessed as part of the ES. 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 that require enhancement.

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 of the AONB are fully assessed and mitigation measures proposed to address any identified issues.

I hope you find these comments useful. I would be happy to discuss further if this would be helpful.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

Katie Miller
Planning Manager, Kent Downs AONB Unit

APPENDIX 1

Planning consultations with the Kent Downs AONB Unit

Background and context:

The Kent Downs Area of Outstanding Natural Beauty partnership (which includes all the local authorities within the AONB) has agreed to have a limited land use planning role. In summary this is to:

- Provide design guidance in partnership with the Local Authorities represented in the AONB.
- Comment on forward/strategic planning issues-for instance Local Development Frameworks.
- Be involved in development management (planning applications) in exceptional circumstances only, for example in terms of scale and precedence.
- Provide informal planning advice/comments on development control (planning applications) at the request of a Kent Downs AONB Joint Advisory member and /or Local Authority Planning Officer.

The Countryside and Rights of Way Act 2000

The primary legislation relating to AONBs is set out in the Countryside and Rights of Way Act 2000. Section 85 of this Act requires that in exercising any functions in relation to land in an AONB, or so as to affect land in an AONB, relevant authorities, which includes local authorities, shall have regard to the purpose of conserving and enhancing the natural beauty of the AONB. This is known as the 'Duty of Regard'. The Duty of Regard can be demonstrated by testing proposals against the policies set out in the Kent Downs AONB Management Plan and its supporting guidance (see below).

Relationship of the AONB Management Plan and Development Management

The CRoW Act requires that a management plan is produced for each AONB, and accordingly the first Kent Downs AONB Management Plan was published in April 2004. The second revision Management Plan (2004-2019) has been formally adopted by all the local authorities of the Kent Downs. The Management Plan may be viewed on the Kent Downs web site. Please let us know if you would like any hard copies.

<https://s3-eu-west-1.amazonaws.com/explore-kent-bucket/uploads/sites/7/2018/04/18113849/KDAONB-Management-Plan.pdf>

Under the CRoW Act, the Management Plan is required to 'formulate the (Local Authority) policies for the management of the AONB and for carrying out their functions in relation to it'. The policies of the Kent Downs AONB Management Plan are therefore the adopted policies of all the Local Authorities in the Kent Downs. The national Planning Policy Guidance confirms that AONB Management Plans can be a material consideration in planning decisions and this view is confirmed in previous appeal decisions, including APP/U2235/W/15/3131945, Land west of Ham Lane, Lenham, Maidstone, where at para 48 of the Inspectorate's decision letter, it is

confirmed that “the Kent Downs AONB Management Plan April 2014 (the Management Plan) is also a further significant material consideration”. The decision can be downloaded at:

<https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3131945>

Any Kent Downs AONB Unit response to consultations on planning applications will reflect the policies of the Management Plan along with other Kent Downs AONB produced guidance which help support the delivery of the policies of the Management Plan, as set out below.

Other Kent Downs AONB Guidance

Kent Downs Landscape Design Handbook

Design guidance based on the 13 landscape character areas in the Kent Downs. Guidance is provided on fencing, hedges, planting, gateways etc. to help the conservation and enhancement of the AONB.

Kent Downs Renewable Energy Position Statement

Provides a clearly articulated position for the Kent Downs AONB partnership with regards to renewable energy technologies. It recognises that each Local Planning Authority must balance the impact of proposals for renewables on the AONB with all the other material planning considerations.

Kent Rural Advice Service Farm Diversification Toolkit

Guidance on taking an integrated whole farm approach to farm developments leading to sound diversification projects that benefit the Kent Downs.

Kent Downs Land Manager's Pack

Detailed guidance on practical land management from how to plant a hedge to creating ponds and enhancing chalk grassland.

Rural Streets and Lanes - A Design Handbook

Guidance on the management and design of rural lanes and streets that takes the unique character of the Kent Downs into account. This document discusses the principle of shared space and uses examples from around the UK and Europe. The Handbook has been adopted by Kent County Council as policy.

Managing Land for Horses

A guide to good practice on equine development in the Kent Downs, including grassland management, fencing, trees and hedges, waste management and basic planning information.

Kent Farmstead Guidance and Kent Downs Farmstead Guidance

Guidance on the conservation, enhancement and development change of heritage farmsteads in the Kent Downs based on English Heritage’s Kent and National Character Area Farmstead Statements. Includes an Assessment method and Design Guidance.

The above documents are available to download at:

<https://www.kentdowns.org.uk/planning/planning-publications/>

The NPPF and AONBs

National planning policies are very clear that the highest priority should be given to the conservation and enhancement of Areas of Outstanding Natural Beauty. The NPPF confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status.

Paragraph 172 of the revised NPPF specifies that 'great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.' It is advised that the scale and extent of development within AONBs should be limited and that major developments should be refused in AONBs except in exceptional circumstances and where it can be demonstrated that they are in the public interest. No definition is given as to what constitutes major development within an AONB, however a footnote to this paragraph states that this is 'a matter for the relevant decision taker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined'.

The thrust of the NPPF as set out in paragraph 11 is that there is a presumption in favour of sustainable development. It specifies that in respect of decision taking, proposals that are in accordance with an up to date development plan should be granted, however where there are no relevant development plan policies, or policies are out of date, permission should be granted unless the application of specific policies in the Framework that protect areas of particular importance provide a clear reason for refusing the development. Footnote 6 to this paragraph specifies that such policies include those relating to AONBs. A Court of Appeal case in June 2017¹ clarified that identification of policies indicated in Footnote 6 (previously footnote 9 to paragraph 14 of the 2012 NPPF), does not shut out the presumption in favour, rather the specific policy or policies have to be applied and planning judgment exercised. In the case of AONBs, this would mean an assessment of the acceptability of the proposal against paragraph 172 of the NPPF.

¹ Barwood Strategic Land II LLP (Appellant) and (1) East Staffordshire Borough Council and (2) Secretary of State for Communities and Local Government (Respondents), on appeal from the Administrative Court Planning Court, [2017] EWCA Civ 893 Case No: C1/2016/4569 [2016] EWHC 2973 (Admin), before: Lord Justice Gross, Lord Justice Underhill and Lord Justice Lindblom, on 25th May 2017.



Claire Shearing
Sevenoaks District Council
Council Offices
Argyle Road
Sevenoaks
Kent
TN13 1HG

Flood and Water Management

Invicta House
Maidstone
Kent
ME14 1XX

Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: SEDC/2018/070732
Date: 11 December 2018

Application No: PA/18/00488

Location: Fort Halstead, Star Hill Road, Dunton Green KENT TN14 7BP

Proposal: Request for a 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

Thank you for your consultation on the above referenced planning application.

Kent County Council as Lead Local Flood Authority have the following comments:

We have reviewed the scoping report for the proposed redevelopment and note that on page 26 it stated that the topic of flood risk is to be scoped in to the proposed Environmental Impact Assessment, as part of this we will expect for a Flood Risk Assessment to be undertaken.

Whilst we have no preference whether the Flood Risk Assessment forms part of an EIA or is a standalone document, it should include a Surface Water Management Strategy to adequately demonstrate how surface water will be managed within the development.

We would refer the applicant to our Drainage and Planning Policy Statement (available at www.kent.gov.uk/flooding) for further information and advice on how we review planning submissions for major development.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

Alex Brauning
Senior Flood Risk Project Officer
Flood and Water Management

Cartwright, Emma @ London SMC

From: Mellor, Paul <Paul.Mellor@bromley.gov.uk>
Sent: 21 December 2018 14:36
To: Claire Shearing
Subject: FW: PA/18/00488 - Fort Halstead Scoping Opinion

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Claire,

Thank you for your consultation relating the request for a scoping opinion in regards to the above site. I apologise for the delay in responding.

The Scoping Report covers transportation and access matters and acknowledges the likely impact of the development on traffic on the local and strategic road network both during construction and following completion. The Council would ask that the full effects of this on the A21 and A233 within Bromley are fully assessed under the EIA and are included as part of Sevenoaks' scoping opinion to the applicant.

Kind regards

Paul Mellor BSc (Hons), MA, MRTPI
Principal Planner
Development Management

From: Claire Shearing [mailto:Claire.Shearing@sevenoaks.gov.uk]
Sent: 18 December 2018 10:54
To: DC North
Cc: Sarah Cottingham; Alison Salter
Subject: FW: PA/18/00488 - Fort Halstead Scoping Opinion

Dear Consultee

DRA Fort Halstead, Otford Lane, Halstead

Scoping Opinion in respect of:

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. Reference PA/18/00488

We have yet to receive any comments from you following our consultation request of 27th November which sought your comments on the Scoping Opinion submitted in relation to the above mentioned development. The Scoping process is our opportunity to inform the developer of the extent of issues that should be considered in their Environmental Impact Assessment which will be submitted with their planning application.

The consultation period expires today. However, if you wish to make comments on the scoping document please forward these to planning.comments@sevenoaks.gov.uk not later than Friday 21st December. After this time we may not be able to include your comments in our response to the developer.

The consultation document is available at this link:

<https://cbftp.cbre.com/download?p=vls4vyeC8VW7kByXrqFIJeo6m1mWev%2bqXfx1deqsiQlc%2fdg1lVdQW5g%2bhCHmnjaRBGg6jmHl%2fj4uXxjbRfSvp1fC%2fb%2bjKMLxNBwF%2fTplEHyVuNUNib5CWZRKV6lackIDGpj4MFJWyoU7l1%2fmJczbC5rZygcVCaLmJXjbxdkFrs%3d>

Please do not hesitate to contact me if you have any queries or would like to discuss.

Kind Regards, Claire Shearing

Claire Shearing MRTPI

Principal Planner (Development Control Planning)

Sevenoaks District Council | Argyle Road | Sevenoaks | TN13 1HG

Please note I do not work on Wednesdays.

Tel: 01732 227 367

Email: Claire.Shearing@sevenoaks.gov.uk

Online: www.sevenoaks.gov.uk

Please note that advice is provided at officer level and in no way prejudices any future determinations made by the Local Planning Authority.

From: DC North

Sent: 28 November 2018 12:35

To: Claire Shearing

Subject: PA/18/00488 - Fort Halstead Scoping Opinion

Dear Sir/Madam,

Re. PA/18/00488 - Fort Halstead EIA Scoping Opinion

I am emailing following our consultation request to you for the EIA Scoping Opinion for the Fort Halstead site in Halstead, Kent (our reference above).

Our original consultation to you was sent on the 23 November 2018. Unfortunately this consultation contained the incorrect proposal description. As such, please disregard this consultation.

We have re-consulted with you on the 27th November 2018. This contains the correct proposal description, which we confirm is as follows:

“Request for a 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.”

The consultation letter included a link to CBRE’s drop-box facility. This is due to expire on the 30th November. Due to this, they have updated the link as follows:

<https://cbftp.cbre.com/download?p=oDCNSmzdIHfdpRDrN6B6X7Qfq0VJI%2fSwtgVzDK7Y54WyGQ4tdJQA0auIF6Di495BX5ARWvT8JotzcFgguinUdlZRbVselO2pNyrvh0ThoJn0eT2USFKnmsCApSpTuA6eMZci8wpUiXxPOoH6SN7v87pX7clk1TXDYfm2smoAtaQ%3d>

This link will expire in 10 days of this email and I would advise downloading the document upon receipt of this email.

The new correct consultation request has a deadline for any comments to be received by the 18th December 2018.

Kind Regards,

Sarah Cottingham

Senior Planning Officer

Sevenoaks District Council | Argyle Road | Sevenoaks | Kent | TN13 1HG

01732 227000

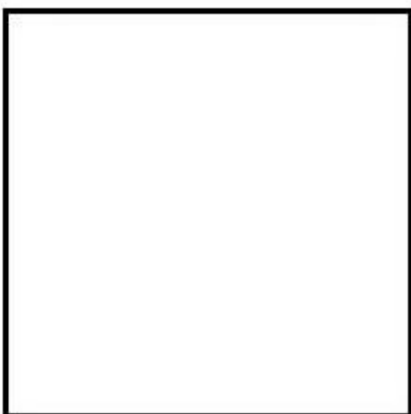
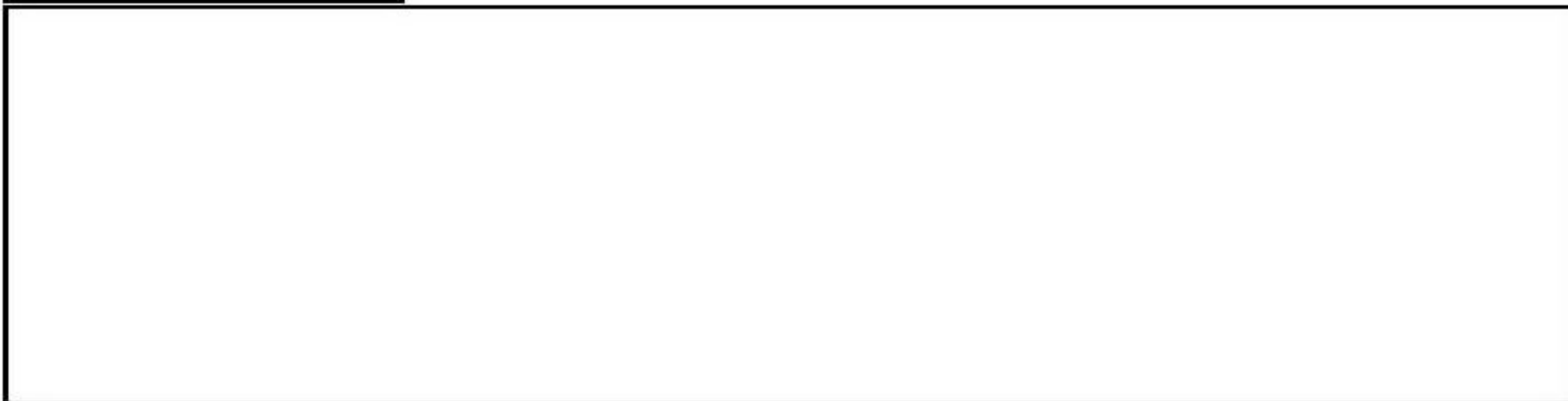
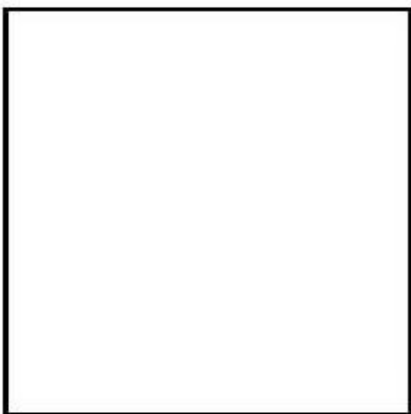
sarah.cottingham@sevenoaks.gov.uk

www.sevenoaks.gov.uk

This advice is without prejudice to the decision making processes of the local planning authority which considers the views of all those consulted on planning applications and in no way prejudices any future determinations or decisions made by the local planning authority.

You are advised to seek your own independent advice on any issues raised in this email.

Debit/credit card payments for planning applications, pre-application enquiries and Appeals can be made online at our website. <https://myaccount.sevenoaks.gov.uk/planning-payment/> For all other Planning payment queries please telephone us on 01732 227000 or email planning.information@sevenoaks.gov.uk Our office hours are Monday – Thursday 08:45 -17:00 and Friday 08:45 – 16:45



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----- End of Disclaimer -----

Date: 19 December 2018
Our ref: 265880
Your ref: PA/18/00488



Sarah Cottingham
Sevenoaks District Council
Argyle Road
Sevenoaks
Kent TN13 1HG

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Cottingham

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): Request for a scoping opinion for an Environmental Impact Assessment for the redevelopment of Fort Halstead including: Mixed-use development comprising a business area of up to 3.7ha, up to 750 residential units, a village centre, use of the Fort area and bunkers as an historic interpretation centre with ancillary workshop space, and works associated with the development
Location: Fort Halstead, Star Hill Road, Dunton Green KENT TN14 7BP

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 28 January 2014 which we received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission.

The application site is located within the Kent Downs Area of Outstanding Natural Beauty (AONB). We understand that the site is subject to an extant outline planning permission for up to 450 residential units, and this current application seeks to increase the total number of residential units to 750. The impacts of the proposed increase in unit density should be carefully assessed through the LVIA³ process. The proposal should be assessed against the three tests for major development within a designated landscape (NPPF para 172), with clear and reasonable justification if exceptional circumstances and public benefit are to be demonstrated.

Regarding documents used to inform the baseline conditions (section 5.19 of the Scoping Report), we advise that consideration is also given to [Sevenoaks Landscape Character Assessment](#) (LUC, January 2017), plus any other documents which may help inform the LVIA.

Reference to long distance views from the site appear to be conflicting, namely in paragraphs 5.21 ('wide panoramic views') and 5.22 ('few long distance views'). We advise that this aspect is reviewed and correctly reflected in the LVIA to avoid confusion.

¹ Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

² *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

³ Landscape and Visual Impact Assessment

Annex A to this letter provides additional advice from Natural England on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact me at amy.kitching@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Amy Kitching

Lead Adviser
Sussex and Kent Team

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition paragraph 176 of the National Planning Policy Framework requires that potential Special Protection

Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

2.1. Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

2.2. Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

2.3. Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species

of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

Ancient Woodland

The S41 list includes six priority woodland habitats, which will often be ancient woodland, with all ancient semi-natural woodland in the South East falling into one or more of the six types.

Information about ancient woodland can be found in Natural England's standing advice http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland_tcm6-32633.pdf.

Ancient woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes. Local authorities have a vital role in ensuring its conservation, in particular through the planning system. The ES should have regard to the requirements under NPPF Para. 175.

Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape Character

Nationally Designated Landscapes

As the development site is within the Kent Downs Area of Outstanding Natural Beauty (AONB), consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the Kent Downs AONB Management Plan.

Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound

basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm.

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Rights of Way, Access land, Coastal access and National Trails

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the adjacent/nearby North Downs Way National Trail. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

5. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can

have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

6. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 174), which should be demonstrated through the ES.

7. Contribution to local environmental initiatives and priorities

Early consideration should be given to how this proposal can fit with local environmental initiatives and priorities, priorities such as delivery of Green Infrastructure(GI), Biodiversity Opportunity Areas (BOAs), and biodiversity enhancements. Opportunities to secure measurable net gains for biodiversity should also be considered at the earliest opportunity (NPPF Para 170, 172, 175).

8. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

From: Claire Shearing
Sent: Tue, 18 Dec 2018 09:11:27 +0000
To: Planning Comments
Subject: FW: PA/18/00488 - Scoping Opinion for an Environmental Impact Assessment - Fort Halstead

Please could this email also be added to PA/18/00488 as the 'SDC Contaminated Land Officer' consultation response. Thanks.

From: Colin Alden [mailto:Colin.Alden@dartford.gov.uk]
Sent: 14 December 2018 16:30
To: Claire Shearing; Planning Comments
Subject: PA/18/00488 - Scoping Opinion for an Environmental Impact Assessment - Fort Halstead

I have already been in discussions with acoustic consultants undertaking the noise assessments for the site, however the development will require acoustic assessment to include evaluations to BS 8233:2014, BS 4142:2014 and for construction activities BS 5228:2009+A1:2014. The assessment to 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.

Comprehensive contaminated land assessments and air quality assessments will be required to show the presence of potential adverse conditions and appropriate mitigation measures where necessary.

Colin Alden
Senior Environmental Health Officer
Environmental Protection Team
Dartford and Sevenoaks
Environmental Health Partnership
01322 343952

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See www.dartford.gov.uk to find out more.

From: Claire Shearing
Sent: Tue, 18 Dec 2018 09:09:07 +0000
To: Planning Comments
Subject: FW: PA/18/00488 - Fort Halstead Scoping Opinion

Please could this be added to PA/18/00488 as the 'SDC Business and Economic Development' consultation response.

Thanks, Claire

From: Andrew Stirling
Sent: 17 December 2018 11:41
To: Claire Shearing
Subject: FW: PA/18/00488 - Fort Halstead Scoping Opinion

Claire

Thanks for our conversation a little earlier.

It would be good see some consideration being given in their proposals around opportunities for generating and providing their own energy, whether through a site wide energy scheme, or else for specific commercial buildings. Technologies are there for PV tiles or cladding which can generate electricity and obviate the needs for traditional panels. This has been raised in meetings with CBRE and I have a conversation planned in the New Year with one of their team who is tasked with looking at energy and utilities.

The other area of benefit would be flexible buildings that allow easy internal rearrangement and interoperability between tech space, office space and teaching space as we are encouraging them about think about future opportunities for collaboration with Universities as well as Qinetiq. Occupiers here may be traditional office or light industrial but also high tech or startup businesses with research links to higher education or Qinetiq.

Kind regards

Andrew

Andrew Stirling MRICS
Head of Economic Development and Property
Sevenoaks District Council | Council Offices | Argyle Road | Sevenoaks | Kent | TN13 1HG
Tel: 01732 227099
Mobile: 07710 064971
Email: andrew.stirling@sevenoaks.gov.uk
Online: www.sevenoaks.gov.uk

From: Business <business@sevenoaks.gov.uk>
Sent: 17 December 2018 08:35
To: Andrew Stirling <Andrew.Stirling@sevenoaks.gov.uk>
Subject: FW: PA/18/00488 - Fort Halstead Scoping Opinion

Andrew Stirling MRICS
Head of Economic Development and Property
Sevenoaks District Council | Council Offices | Argyle Road | Sevenoaks | Kent | TN13 1HG
Tel: 01732 227099
Mobile: 07710 064971
Email: andrew.stirling@sevenoaks.gov.uk
Online: www.sevenoaks.gov.uk

From: DC North <dc.north@sevenoaks.gov.uk>
Sent: 28 November 2018 12:35
To: Claire Shearing <Claire.Shearing@sevenoaks.gov.uk>
Subject: PA/18/00488 - Fort Halstead Scoping Opinion

Dear Sir/Madam,

Re. PA/18/00488 - Fort Halstead EIA Scoping Opinion

I am emailing following our consultation request to you for the EIA Scoping Opinion for the Fort Halstead site in Halstead, Kent (our reference above).

Our original consultation to you was sent on the 23 November 2018. Unfortunately this consultation contained the incorrect proposal description. As such, please disregard this consultation.

We have re-consulted with you on the 27th November 2018. This contains the correct proposal description, which we confirm is as follows:

“Request for a 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.”

The consultation letter included a link to CBRE’s drop-box facility. This is due to expire on the 30th November. Due to this, they have updated the link as follows:

<https://cbftp.cbre.com/download?p=oDCNSmzdIHfdpRDrN6B6X7Qfq0VJI%2fSwtgVzDK7Y54WyGQ4tdJQA0aulF6Di495BX5ARWvT8JotzcFqguinUdlZRbVselO2pNyrvh0ThoJn0eT2USFKnmsCApSpTuA6eMZci8wpUiXxPOoH6SN7v87pX7clk1TXDYfm2smoAtaQ%3d>

This link will expire in 10 days of this email and I would advise downloading the document upon receipt of this email.

The new correct consultation request has a deadline for any comments to be received by the 18th December 2018.

Kind Regards,

Sarah Cottingham

Senior Planning Officer

Sevenoaks District Council | Argyle Road | Sevenoaks | Kent | TN13 1HG

01732 227000

sarah.cottingham@sevenoaks.gov.uk

www.sevenoaks.gov.uk

This advice is without prejudice to the decision making processes of the local planning authority which considers the views of all those consulted on planning applications and in no way prejudices any future determinations or decisions made by the local planning authority.

You are advised to seek your own independent advice on any issues raised in this email.

From: Les Jones
Sent: Tue, 18 Dec 2018 15:30:34 +0000
To: Planning Comments
Subject: DRA Fort Halstead. PA/18/00488

It may seem obvious but various aspects of the existing landscape are important. As such I would expect to see details of existing trees showing those to be removed and those to be retained. Protection details for those to be retained inclusive of the Ancient Woodland areas along with any access to them. What management of the Ancient Woodland is proposed especially if any of the woodland areas are to be opened to the public. Proposed landscaping details will also be expected.

Mr Les Jones

Arboricultural & Landscape Officer

Sevenoaks District Council | Council Offices | Argyle Road | Sevenoaks | Kent | TN13 1HG

Direct line: 01732 227289

Fax: 01732 227017

www.sevenoaks.gov.uk/trees

Please don't print this e-mail unless you really need to

This advice is without prejudice to the decision making processes of the local planning authority which considers the views of all those consulted on planning applications and in no way prejudices any future determinations or decisions made by the local planning authority. You are advised to seek your own independent advice on any issues raised in this email.

Planning Services
Sevenoaks District Council
P O Box 183
Argyle Road
Sevenoaks
Kent
TN13 1GN

Developer Services
Southern Water
Sparrowgrove House
Sparrowgrove
Otterbourne
Hampshire
SO21 2SW

Tel: 0330 303 0119

Email: developerservices@southernwater.co.uk

SEVENOAKS DISTRICT COUNCIL

REC'D 18 DEC 2018

COMMUNITY & PLANNING SERVICES

Your Ref

PA/18/00488

Our Ref

K/SE/2018/00488

Date

17/12/2018

Dear Sirs,

Proposal: Request for a 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. Site: DRA Fort Halstead Otford Lane, Halstead, Kent, TN14 7BP. PA/18/00488

Thank you for your letter of 28/11/2018.

The development site is not located within Southern Water's statutory area for water supply, drainage and wastewater services. Please contact, the relevant statutory undertaker to provide water supply, drainage and wastewater services to this development.

Yours sincerely

Developer Services

From: BCTAdmin@thameswater.co.uk
Sent: Thu, 29 Nov 2018 09:54:56 +0000
To: Planning Comments
Subject: 3rd Party Planning Application - PA/18/00488 - reconsult
Importance: Normal

Sevenoaks District Council
Council Offices
PO Box 182, Argyle Road
Sevenoaks
Kent
TN13 1GP

Our DTS Ref: 41874
Your Ref: PA/18/00488 - reconsult

29 November 2018

Dear Sir/Madam

Re: FORT HALSTEAD , STAR HILL ROAD, SEVENOAKS, DUNTON GREEN, KENT, TN14 7BP

Waste Comments

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Water Comments

Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments: The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

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