

**Fort Halstead**

AONB Statement

*A Review of the Kent Down Area of Outstanding Natural Beauty Unit Consultation  
Comments*

May 2020

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*This document has been prepared and checked in accordance with ISO 9001:2008.*

## 1.0 Overview

The Kent Down Area of Outstanding Natural Beauty (AONB) Unit have provided a detailed letter (dated 13<sup>th</sup> November 2019) responding to the September 2019 Fort Halstead hybrid planning application.

This application was for a mix of employment and residential development, with up to 750 dwellings, in line with Sevenoaks District Council's (SDC) expectations that the Site was able to deliver a greater quantum of housing to meet local demand, as identified in the draft allocation in Sevenoaks Local Plan (2015-2035).

It should be noted that the application site already has outline planning permission (Application Reference 15/00628/OUT) for a mixed use development, with up to 450 dwellings. The AONB Unit did not object to this scheme.

Based on ongoing consultation with SDC and other stakeholders the application has been further amended. The proposed development is now for up to 635 residential dwellings; employment / mixed use land uses (including safeguarded land for a potential school site); a centrally located village centre comprising public space and community facilities; and retention and enhancement of existing important landscape / habitats features and creation of new green infrastructure.

This statement has been prepared by LDA Design Consulting Limited (LDA Design) to provide commentary on the AONB's response, drawing on both the September 20019 planning application and more recent amendments to the scheme design. The statement s structured as per their November 2019 letter, however, it does not seek to address each specific point raised and instead deals with the main themes arising.

LDA Design are landscape architects and protected landscape specialists who have been appointed by the Merseyside Pension Fund (the Client) to consider the likely impact of the current development proposals on the landscape and visual environment; help shape the masterplan / green infrastructure strategy; and prepare a Landscape and Visual Impact Assessment (LVIA) and AONB Report to accompany the planning application.

## 2.0 Commentary

### 2.1. Introduction

The AONB Unit's response acknowledges that the principle of redevelopment of Fort Halstead is accepted, and that the application site presents a unique opportunity to create sustainable development. The AONB Unit's response also notes that the proposals should be landscape led.

The proposals are considered to be fully landscape led and an understanding of the location and context of the site within the Kent Downs AONB has been a crucial component of the iterative design process. LDA Design has been involved in the project from the outset, contributing significantly to the development parameters; Illustrative Masterplan; and detailed design of the Village Centre in order to ensure the statutory requirements of the AONB designation have been fully considered. Interactions between the project masterplanners, LDA Design, ecology consultants and heritage consultants have been particularly important to shaping the green infrastructure proposals for the proposed development, ensuring that existing landscape features are retained, protected and enhanced where possible.

The AONB Unit's response raises concerns regarding the increased number of residential dwellings, which have increased from 450 (the 2015 planning permission) and 750 (the September 2019 planning application).

The increase in the number of residential units from 450 is in line with Sevenoaks District Council's (SDC) expectations that the Site was able to deliver a greater quantum of housing to meet local demand, as identified in the draft allocation in Sevenoaks Local Plan (2015-2035). This was supported by technical studies undertaken by the Client consultants team that demonstrated that additional housing could be accommodated within the site (within areas of previously developed land) without any significant adverse environmental effects, over and above that of the permitted development. Specifically, in relation to landscape character and views, it was concluded that the proposed development would still improve the visual amenity and character of the application site; and would positively contribute to the natural beauty criteria of the AONB.

However, in response to consultation comments received on the September 2019 proposed scheme and other technical / viability considerations, the number of dwellings has since been reduced from 750 to 635. This has been achieved through a reduction in the development area and density.

The AONB Unit's response also raise concerns regarding the information provided with the application and degree of certainty that this provides. While this a new planning application (and does not rely on any of the information associated with the 2015 planning permission) the content and nature of the application is similar to that of the 2015 application and which was considered acceptable by SDC and other stakeholders.

With the exception of the 'Village Centre' proposals, the application is in outline and therefore seeks to 'fix' key principles and parameters rather than detailed design matters. The Design and Access Statement has introduced further guidance both mandatory and advisory, in relation to the character areas. As with the original permitted planning application, reserved matters applications will be prepared to provide detail on the scale, layout

appearance, and landscaping of the development and the AONB Unit will be consulted on as part of this process.

## 2.2. Policy Background

The AONB Unit's response describes the planning policy and legislative context which is agreed. The AONB Unit's response also states that in relation to the increase of 300 units:

*“This significant increase in numbers is accommodated through a combination of larger, bulkier buildings in the village centre, a reduced village green, a reduction of 4.5ha of green spaces, inclusion of two previously proposed undeveloped areas at either end of the site and an increase in density and heights, all of which have the potential to negatively impact on the special character and qualities of the Kent Downs AONB”.*

It is noted that:

- While there have been some variations in height parameters between the 2015 planning permission and the September 2019 planning application, there were no overall increases in the maximum building height parameters.
- The 2015 planning permission included an allowance for an energy centre / flue, for which a maximum height parameter of 25m was permitted. This was not proposed as part of the September 2019 planning application.
- There was a slight reduction in green space as part of the September 2019 planning application, however, the proposed development still provided a large quantum of green infrastructure and opens up this currently private site for the understanding and enjoyment of the public.
- The additional two areas of land for development are previously developed land, with the parcel to the east containing a heli-pad and the parcel to the west containing above ground bunkers.

Since the September 2019 planning application, in response to consultation comments received and other technical / viability considerations the number of dwellings has been reduced by 165 units to 635 units. This has been achieved by:

- The exclusion of the 'heli-pad' site for residential uses
- Reduction in densities across the development, particularly within the Village Mews character area

Overall this has reduced the density of development in the core of the site and allows for increased opportunities for green space as part of the development. In addition, there has been some reductions in residential building height parameters with residential development now predominantly 2 / 2.5 storey.

### **2.3. The height of the buildings must take into account the need to conserve and enhance the natural beauty of the countryside**

The AONB's Unit Response challenges the proposed building heights and states that ensuring the proposed development is screened by the surrounding woodland is not sufficient justification.

As set out in the AONB Report, the vision for the proposed development is not to create a 'traditional' AONB village - that mimics existing settlement patterns, building density, and architectural detail. Instead the approach to the development seeks to create a village structure but more closely reflects its historic military development and creates a new community that:

- Provides a genuine live-work opportunity, with employment and residential uses side by side, supported by a range of shared community facilities.
- Utilises the existing layout and structure of the site as far as possible, minimising the need for new infrastructure and engineering works.
- Retains and enhances the valuable natural and cultural assets within and around the site, including historic structures, mature trees, Ancient Woodland and chalk grassland.
- Opens up a previously private, secured area of the Knockholt and Halstead Wooded Downs, removing sections of the security fence, enhancing existing footpaths / creating new routes; and providing interpretation of important features.
- In line with prevailing policy and guidance, ensures efficient use of land and delivers much needed market and affordable housing in the local area.

Building heights have been influenced by an understanding of existing settlements in the local area (as detailed in Section 3.0 of the Design and Access Statement). Domestic buildings within smaller AONB villages are typically 2 stories in height, but with taller structures, while larger settlements such as Westerham and Wrotham have a much broader range of building typologies and heights.

With the application site itself, there are a number of taller structures, with some existing buildings up to 15 metres and building N2 approximately 21 metres high.

The surrounding woodland is also an important consideration. By ensuring that the development is well contained and does not generally break above the tree-line, impacts on wider landscape character and views have been minimised.

The September 2019 planning application subsequently proposed residential areas that were typically 2 – 3 storeys in height, with occasional taller buildings to provide variation; landmarks; and way finding. This was considered to provide an appropriate design response that reinforced the intended character of the new community; ensured efficient use of land; reflected local context; and minimised the extent of landscape and visual effects.

As set out above, since the September 2019 planning application and in response to consultation comments received and other technical / viability considerations the number of

dwellings has been reduced by 165 units to 635 units. This has also included reductions in proposed residential building height parameters as follows:

- 3 storey residential areas have now been reduced to 2.5 storey, with occasional 3 storey landmark buildings.
- 2.5 storey residential areas have now been reduced to 2 storey, with occasional 2.5 storey landmark buildings.

Overall this allows for residential areas to more closely reflect local settlement context.

#### **2.4. Make a positive contribution to the achievement of aims and objectives of the Kent Downs AONB Management Plan / conserve and enhance the natural beauty and tranquillity of the Kent Downs Area of Outstanding Natural Beauty**

The AONB's Unit Response states the proposed development does not conserve or enhance the natural beauty of the AONB.

The proposed development is considered to improve the visual amenity and character of the application site itself. The majority of the utilitarian structures, workshops, car park and disturbed land that currently dominate the application site will be removed and replaced by residential and employment built form, punctuated and intertwined by new areas of green infrastructure. In addition, the visual amenity of adjacent Public Rights of Way would be substantially improved by the removal of the vast majority of the existing perimeter security fencing.

Beyond the application site itself, landscape and visual effects are limited do to the fact that the development is well contained by the surrounding trees and woodland.

In relation to the natural beauty of the AONB, full consideration has been given how the natural beauty of the AONB may be affected by the proposed development. This information is contained with the AONB Report and includes:

- A summary of the statutory duties of AONBs by reference to relevant legislation and guidance, and a description of the natural beauty criteria specific to the Kent Downs AONB. This uses Natural England's designation guidance as its structure and draws on information contained within AONB Management Plan and local landscape character assessments.
- A summary of relevant planning policy context, which provides an understanding of the current condition of the AONB landscape; landscape management guidance; and development control objectives.
- A description of the development proposals, with reference to the iterative mitigation by design process and illustrative masterplan.
- A summary of the relevant technical studies that inform the judgements of potential effects of the project. This includes information on built heritage; ecology and nature conservation; transport and access; noise and vibration; landscape and visual; tree surveys; and lighting.



- An appraisal of the how the statutory duties and natural beauty criteria of the Kent Downs AONB may be affected by the proposed development and what mitigation / control measures are proposed to mitigate any potentially adverse effects.

The retention and enhancement of the natural features of the application site is one way in which the proposed development has been influenced by the AONB context. The AONB Unit's response agrees with the emphasis placed on protecting mature trees, chalk grassland and woodland, however, it goes on to state that this *"does not add up to conserving and enhancing the AONB or making a net contribution to the purposes of the AONB Management Plan"*.

The AONB Response does not recognise the many benefits arising from the proposed development and the how the scheme design has been fully informed by the natural beauty criteria specific to the Kent Downs AONB and the associated Management Plan objectives. The AONB Report concludes that the proposed development would positively contribute to the natural beauty criteria of the AONB in the following ways:

- It would enhance landscape and scenic quality, delivering a well-designed settlement and improve the character and appearance of the application site.
- It would enhance natural heritage features, ensuring the retention and sensitive management of the woodland, mature trees and areas of chalk, semi-improved and neutral grassland.
- It would enhance cultural heritage features, retaining and restoring key heritage assets and celebrating the application sites military history.
- It would benefit the understanding and enjoyment of the landscape, opening up the application site to the public and establishing a Historical Interpretation Centre within the Fort.
- It would improve the social and economic wellbeing of communities within the AONB. creating a range of new housing, employment and recreational facilities.

The development proposals are also considered to be compliant with the themes of the prevailing planning policy framework, ensuring a high standard of design and efficient use of land; protecting and enhancing the character of the AONB; and making a positive contribution to landscape, biodiversity, heritage and recreational assets.

## **2.5. Provide for a comprehensive development and include a phasing plan / delivery mechanisms**

The AONB Unit's response raised concerns regarding the details of phasing and delivery mechanisms.

An indicative phasing plan is provided in the DAS for information. As with the original 2015 planning application (and all large scale applications generally), delivery will be phased with reserved matter applications being brought forward in compliance with the design and development parameters and principles fixed in the DAS. As a statutory consultee the AONB Unit will be consulted as part of this process.

## **2.6. Development Plan / AONB Management policies**

The AONB Unit's response goes on to list further relevant Development Plan / AONB Management policies.

All relevant policies and guidance have been considered as part of the LVIA Report, AONB Report and Planning Statement.

## **2.7. Harm to the Kent Downs AONB**

The AONB Unit's response states that the proposals to increase the density of the previously permitted site at Fort Halstead from 450 to 750 to be wholly inappropriate and does not reflect the sensitive landscape context.

As detailed above, since the September 2019 planning application and in response to consultation comments received and other technical / viability considerations the number of dwellings has been reduced by 165 units to 635 units. This has also included reductions in proposed residential building height parameters.

An understanding of the location and context of the site within the Kent Downs AONB has been a crucial component of the iterative design process. While it is accepted that the proposed development will invariably alter the character and appearance of the application site, these changes are considered to be positive. In addition, the proposed development would positively contribute to the natural beauty criteria of the AONB, enhancing landscape and scenic quality; enhancing natural and cultural heritage features; benefiting the understanding and enjoyment of the landscape; and improving the social and economic wellbeing of communities within the AONB through new housing; employment opportunities; and recreational facilities.

The AONB Unit's response refers to tree loss across the application site. The layout of development has been carefully considered to allow for the retention and protection of the vast majority of trees / woodland. Resources will also be made available for the long-term management of the landscape, and an Outline Landscape and Ecology Management Plan has been prepared to guide the long-term management of landscape and ecological habitat features to be retained and created on site. Furthermore, since the September 2019 planning application the number of dwellings has been reduced by 165 units to 635 units, allowing for even greater tree retention. It should also be noted that the SDC Tree and Landscape Officer has not objected to the development proposals.

The AONB Unit's response also refers to relevant landscape character assessment and guidance. It is agreed that that application site falls within the Knockholt: Darent Valley LCA as defined by the Kent County Landscape Character Assessment. This study, and other more local assessments – such as the Sevenoaks Landscape Character Assessment – have been used to consider and assess likely landscape effects as recorded in the Landscape and Visual Impact Assessment (and subsequently summarised in the AONB Report). Key characteristics of the landscape, such as the dense woodland and scarp slope, have informed the design and layout of the proposed development. This includes retaining and enhancing the visually and ecological sensitive scarp slope, and ensuring the proposed development is located behind the existing woodland on areas of previously developed land. It is also noted that the landscape character assessments record that in certain locations, densely settled areas and the M25 road corridor exert considerable influence on the landscape. The application site

itself is in close proximity to the M25 and within 2km of the urban fringe of Sevenoaks and comprises c.90,000sqm of built form.

The AONB Consultation Response also refers to lighting and policies on 'dark skies'. While it is not considered that this area is particularly 'dark', the lighting assessment and strategy concludes there are potential benefits arising from a reduction in sky glow / light intrusion. The detail of the lighting strategy would be progressed as part of Reserved Matters applications.

## **2.8. Densities**

The AONB Unit's response consider higher densities to be unacceptable and that more variation should be introduced within different character areas.

Density is not 'fixed' at this stage with an indicative density plan submitted with the outline planning application and density ranges provided within the DAS for each character area. , As with the 2015 planning permission, reserved matters applications will be prepared to provide detail on the scale, layout and appearance of the development in accordance with the parameters and 'mandatory' design principles for each character area set out in the DAS. This will include consideration of how different densities can be applied and the AONB Unit will be consulted as part of this process.

As detailed above, since the September 2019 planning application and in response to consultation comments received and other technical / viability considerations the number of dwellings has been reduced by 165 units to 635 units. This allows for a reduction in densities across the development, particularly within the Village Mews character area.

## **2.9. Heights**

The AONB Unit's response consider the building height parameters to be unacceptable and would be inconsistent with the existing buildings within the site and surrounding AONB villages.

As set out in Section 2.3 of this document, while the vision for the proposed development is not to create a 'traditional' AONB village, the design has been influenced by the character of existing settlements in the local area.

The proposed residential areas are now typically 2 – 2.5 storeys in height, with occasional taller buildings to provide variation; landmarks; and way finding.

## **2.10. Design**

The AONB Unit's response highlights that one area of concern is the proposed scale and design of apartment blocks in the Village Centre.

3 and 4 storey structures are not considered to be 'urban' or 'more appropriate to a city location'- their suitability depends on matters such as local context; layout and design; and intended character of a place. In this particular location they are designed to:

- Define the 'core' of the new settlement and frame the village square
- Provide variation and contrast to other parts of the development
- Provide an appropriate context to the retained Listed buildings

- Reflect the character and height of existing laboratory / workshop buildings in this part of the application site.

It should also be noted that the design of the Village Centre has been subject to extensive discussion with the SDC Conservation Officer and Historic England.

### **2.11. Materials**

The AONB Unit's response raises concerns regarding the selection building material and finishes.

At this stage, details of material are indicative only with the exception of Q13 and Q14 in the Village Centre. As with the original permitted planning application, reserved matters applications will be prepared to provide detail on the scale, layout and appearance of the development and the AONB Unit will be consulted on as part of this process.

### **2.12. Highways**

The AONB's Unit response raises concerns regarding the highways proposals, including the proposed roundabout at Polhill to facilitate site access; and the layout of roads within the application site.

While it is acknowledged that Polhill falls within the AONB, this is a principle 'urban' road; on the boundary of the AONB; and adjacent to the M25 road corridor. A roundabout at this location is considered to be entirely appropriate and not dissimilar to the roundabout further south-west, at the junction of Polhill, Star Hill, Sundridge Road, and Morants Court Road. Furthermore, the Polhill roundabout was granted planning permission in 2015.

The design of the internal road network is guided by the existing site layout and the desire to reuse as much as the existing road network as possible. Utilising the existing road network has a number of benefits including minimising the need for new road infrastructure; minimising potential impacts on existing trees associated with new / realigned roads; reflecting the military history of the application site; and recognising the important relationships between existing routes and retained heritage structures.

### **3.0 Conclusion**

Overall it is concluded that the AONB context has been a crucial component of the iterative design process. While it is accepted that the proposed development will invariably alter the character and appearance of the application site, these changes are considered to be positive. In addition, the proposed development would positively contribute to the natural beauty criteria of the AONB.

The amendments made to the September 2019 planning application – in response to consultation comments received and other technical / viability considerations - has resulted in a reduction in the number of dwellings by 165 units; allows for reductions in the density of residential areas; allows for increased opportunities for green space as part of the development; allow for greater retention of existing trees; and includes reductions in proposed residential building height parameters. All of these are considered to be of beneficial in relation to landscape and AONB context.

As a hybrid application, with the exception of the Village Centre, the detail for the proposed development is outline. As with the 2015 planning permission, reserved matters applications will be prepared to provide detail on the scale, layout and appearance of the development in accordance with the parameters and 'mandatory' design principles for each character area set out in the DAS. The AONB Unit will be consulted as part of this process.