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2.1 INTRODUCTION

This chapter sets out:

- the stages of the EIA that have been undertaken;
- the issues that have been 'scoped in' and 'scoped out' of consideration in this ES through consultation with SDC and other consultees;
- the format of the ES technical chapters; and
- the methodology that has been used to assess the significance of effects associated with the scheme.

2.2 SCREENING

Screening is the first stage of the EIA process. It establishes if a development is 'EIA development' and whether the planning application therefore needs to be accompanied by an ES.

For the proposed development, a formal screening opinion has not been requested from SDC as to whether the proposals constitute 'EIA development' and require an EIA to be undertaken. The Applicant acknowledges the nature and scale of the proposals and characteristics of the surrounding environment. Therefore, in the interests of undertaking a robust assessment of their likely environmental effects, the Applicant has committed to undertaking an EIA and submitting an Environmental Statement (ES) to SDC alongside the proposed hybrid planning application.

2.3 SCOPING

The Intended Focus of EIA

EIA is a process that should be focussed on the likely significant environmental effects of a proposed development. It is not intended to be a process to address all the possible environmental effects. One of the main criticisms of current EIA practice is that the scope is often drawn too widely, which results in ES documents that are unnecessarily long and are less useful for their intended purpose, i.e. to act as a decision-making tool.

"At its best, EIA helps to shape the design and siting of development such that social value to communities and broader economic value to investors can both be met, without eroding natural capital and pushing the boundaries of environmental limits – a tool that can truly support moves towards sustainability. However, the many competing demands can often serve to stifle the process, resulting in reams of information that mask the key environmental issues that need to be considered." [1]

Request for a Scoping Opinion

Scoping is an important, though optional, exercise undertaken throughout the early stages of the EIA process. Its purpose is to focus the EIA and resultant ES on key issues and to avoid the unnecessarily complicated examination of minor issues. In practice, the process involves determining the information that needs to be included in the ES through consultation with the competent authority, statutory consultees and other stakeholders.

A request for a scoping opinion ('Scoping Report') was compiled and submitted to SDC on 21 November 2018.

The Scoping Report proposed that the following topics would be 'scoped in' for further consideration in the ES, as significant environmental effects are considered likely:

- Socio-economics;
- Landscape & visual amenity;
- Cultural Heritage – Built Heritage;
- Ground conditions;
- Water resources and flood risk;
- Biodiversity;
- Transportation and access;
- Air quality; and
- Noise & vibration.

The Scoping Report proposed that the following topics would be 'scoped down' (i.e. included within the ES technical appendices but not meriting the preparation of a stand-alone technical chapter within the main volume). It was considered unlikely that these technical topics would exhibit significant environmental effects but further assessment was required to satisfy planning requirements:

- Buried Heritage – archaeology;
- Human health;
- Major accidents & disasters; and
- Climate change and greenhouse gas emissions.

The Scoping Report proposed that the following topics would be 'scoped out' of further consideration within the ES on the basis that they were considered unlikely to be significant and did not warrant a report or stand-alone chapter within the ES:

- Waste management;
- Daylight, sunlight and overshadowing;
- Lighting;
- Land; and
- Wind.

The EIA Scoping Report is included as **Appendix 2.1, ES Volume III**.

Adopted Scoping Opinion and Summary of Consultation Responses

The Scoping Report was circulated by SDC to a range of internal and external consultees. On 5 April 2019, SDC issued their Scoping Opinion, alongside the consultee responses. The Scoping Opinion and supporting documents are provided in **Appendix 2.2, ES Volume III**.

A letter, prepared by Waterman on behalf of the Applicant, responding to initial comments received from Wendy Rogers of the Kent County Council (KCC) Heritage Conservation Team was provided to Ms. Rogers on 31 January 2019. Subsequent discussions with the KCC Heritage Conservation Team followed prior to the provision of the Scoping Opinion on 5 April 2019, these are detailed in Chapter 8 Historic Environment of this ES.

The scoping consultation responses are summarised in **Table 2.1** below, which also indicate where these issues have been considered within the ES.

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Table 2.1
Summary of Consultation Responses

CONSULTEE	COMMENT	WHERE ADDRESSED
Sevenoaks District Council Decision Letter (5 April 2019) This includes comments from other Statutory Consultees that have not been replicated again under the specific Statutory Consultee sections subsequent. For example, both comments provided by: ■ the Business and Economic Development team within Sevenoaks District Council, and ■ Thames Water, have been addressed in this section of the table and have not been repeated separately.	*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.*	SDC's comments have been taken into account throughout the completion of the EIA and ES. Further information is provided in the subsequent sections of this table.
	Biodiversity and geology	
	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.	Measures to ensure that retained habitats are protected during construction works will be implemented through the use of a Construction Ecological Management Plan (CEcMP) and retained and created habitats will be subject to long-term management and monitoring in accordance with a Landscape and Ecological Management Plan (LEMP), to ensure that their biodiversity value is maintained and/or enhanced. Further information is provided in Chapter 9, ES Vol II and provided within Appendix 9, ES Vol III.
	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.	Measures to ensure that retained habitats are protected during construction works will be implemented through the use of a Construction Ecological Management Plan (CEcMP) and retained and created habitats will be subject to long-term management and monitoring in accordance with a Landscape and Ecological Management Plan (LEMP), to ensure that their biodiversity value is maintained and/or enhanced. Further information is provided in Chapter 9, ES Vol II.
	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.	A 15m Ancient Woodland buffer is to be maintained across the site. Development is designed to not affect Ancient Woodland and this is addressed in Chapter 9 Biodiversity, as is sufficiency of existing NVC survey data from within the Ancient Woodland. An Arboricultural Impact Assessment is also provided within Appendix 3.1, ES Vol III.
	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.	The air quality assessment is summarised in Chapter 11, ES Vol II and provided in Appendix 11.1, ES Vol III.
	Contamination	
	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.*	This is addressed in Chapter 13 Ground Conditions & Contamination, ES Vol II and the assessment is provided in Appendix 13.1, ES Vol III.
	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. *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.*	This is included in Chapter 7 Landscape and Visual, ES Vol II and provided in Appendix 7.1, ES Vol III.
	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.	This is included in Chapter 7 Landscape and Visual, ES Vol II and provided in Appendix 7.1, ES Vol III.
	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.	This is included in Chapter 7 Landscape and Visual, ES Vol II and provided in Appendix 7.1, ES Vol III.

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	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 included in Chapter 7 Landscape and Visual, ES Vol II and provided in Appendix 7.1, ES Vol III.
	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.	This is included in Chapter 10 Transportation, ES Vol II, in Appendix 10.1, ES Vol III, and in the AONB Report that accompanies the application.
	The Sevenoaks Landscape Character Assessment, January 2017, should also be included to inform the baseline conditions for the LVIA.	This is included in Chapter 7 Landscape and Visual, ES Vol II and provided in Appendix 7.1, ES Vol III.
	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.	This is included in Chapter 7 Landscape and Visual, ES Vol II and provided in Appendix 7.1, ES Vol III.
	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.	This is addressed in the Arboricultural Impact Assessment is also provided within Appendix 3.1, ES Vol III.
	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 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.	A 15m AW buffer is to be maintained across the site. Development is designed to not affect Ancient Woodland and this will be demonstrated in Chapter 9 Biodiversity, as will sufficiency of existing NVC survey data from within AW. This information is provided in Chapter 9 Biodiversity and Appendix 9, ES Vol III. The Arboricultural Impact Assessment is also provided within Appendix 3.1, ES Vol III.
	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.	This is addressed in Chapter 9 Biodiversity, ES Vol II and provided in Appendix 9, ES Vol III and the Arboricultural Impact Assessment & Tree Retention Report provided within Appendix 3.1, ES Vol III.
	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.	This is addressed in Chapter 9 Biodiversity, ES Vol II and provided in Appendix 9, ES Vol III and the Arboricultural Impact Assessment & Tree Retention Report provided within Appendix 3.1, ES Vol III.
	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.	All habitats on the application sire and in the surrounding survey area (up to the blue line boundary in Figure 1.1 Chapter 1) have been considered. This is addressed in Chapter 9 Biodiversity, ES Vol II and provided in Appendix 9, ES Vol III and the Arboricultural Impact Assessment & Tree Retention Report provided within Appendix 3.1, ES Vol III.
	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.*	The existing surface water regime is to discharge within the ancient woodland, Chapter 14 Water Resources and Flood Risk, addresses what the proposed drainage strategy is for the new development. This includes storage and attenuation on site with subsequent re-charge of the ground water table at the application site.
	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.	Measures to ensure that retained habitats are protected during construction works will be implemented through the use of a Construction Ecological Management Plan (CEcMP) and retained and created habitats will be subject to long-term management and monitoring in accordance with a Landscape and Ecological Management Plan (LEMP), to ensure that their biodiversity value is maintained and/or enhanced. Further information is provided in Chapter 9, ES Vol II and provided within Appendix 9, ES Vol III.
	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.	A separate Sustainability Statement and Energy Strategy have accompanied the application. Chapter 3 Application Site and Proposed Development also discusses the proposed development's approach to its energy strategy and, lastly, Appendix 2.4 addresses the

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		potential implications of climate change.
	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 refer to Chapter 7 Landscape and Visual, ES Vol II and provided in Appendix 7.1, ES Vol III.
	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.	Please refer to the application plans provided in Chapter 3, Site Description & Development Proposals, ES Vol II.
	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.	Please refer to the application plans provided in Chapter 3, Site Description & Development Proposals, ES Vol II.
	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.*	This is included in Chapter 14 Water Resources and Flood Risk, ES Vol II and provided in Appendix 14.1, ES Vol III.
	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.*	This is included in Chapter 14 Water Resources and Flood Risk, ES Vol II and provided in Appendix 14.1, ES Vol III, and in the Utilities Report that accompanies the application and may be found at Appendix 14.2, ES Vol III.
	Heritage Assets	
	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).	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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).	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	The developer should submit an archaeological desk-based assessment and Archaeological Mitigation Framework Strategy. (NPPF para 189).	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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.	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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.	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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*	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.

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	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, the spaces and routeways in between the buildings of heritage interest.	
	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.	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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.*	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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.	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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.	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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.	This is addressed in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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.	This is addressed in Chapter 10 Transportation, ES Vol II and the assessment is provided in Appendix 10.1, ES Vol III.
	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.	This is addressed in Chapter 10 Transportation, ES Vol II and the assessment is provided in Appendix 10.1, ES Vol III.
	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).	This is addressed in Chapter 10 Transportation, ES Vol II and the assessment is provided in Appendix 10.1, ES Vol III.
	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.	This is addressed in Chapter 10 Transportation, ES Vol II and the assessment is provided in Appendix 10.1, ES Vol III.
	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.	This is addressed in Chapter 12 Noise & Vibration, ES Vol II and the assessment is provided in Appendix 12.3, ES Vol III.
	Climate Change	

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	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.	This is addressed in the Energy Strategy and Sustainability Statement which accompany the application, in addition to being discussed in Chapter 3 Application Site & Proposed Development of this ES and within Appendix 2.4 ES Vol II.
	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.	The application is submitted in outline form for the majority of the proposed development with the exception of Buildings Q13 and Q14 (Grade II Listed., Consequently, there remains significant potential during detailed design and subsequent reserved matters applications for the internal commercial building layouts to have flexibility in terms of their internal layout.
Kent Downs AONB (November 2018)	*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 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.*	This is addressed in Chapter 7 Landscape and Visual, ES Vol II, in Appendix 7.1, ES Vol III, and in the AONB Report that accompanies the planning application.
	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.	A Lighting Impact Assessment is provided at Appendix 3.3. This is also addressed in Chapter 7 Landscape and Visual, ES Vol II, in Appendix 7.1, and in the AONB Report that accompanies the planning application.
Environment Agency (December 2018)	*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.*	This is addressed in Chapter 13 Ground Conditions & Contamination, ES Vol II and the assessment is provided in Appendix 13, ES Vol III.
	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.*	This is addressed in Chapter 13 Ground Conditions & Contamination, ES Vol II and the assessment is provided in Appendix 13, ES Vol III.
Contaminated Land Officer, Environmental Protection Team, Dartford and Sevenoaks Environmental Health Partnership (December 2018)	*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.*	This is addressed in Chapter 12 Noise & Vibration, ES Vol II and the assessment is provided in Appendix 12.3, ES Vol III.
	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.	These assessments are summarised in Chapter 11 Air Quality and Chapter 13 Ground Conditions & Contamination, ES Vol II and provided in Appendices 11 and 13, ES Vol III.
Forestry Commission England (December 2018)	*There are a number of ancient woodlands present in and around the proposed location. The map in appendix 1 shows their locations. 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.*	Measures to ensure that retained habitats are protected during construction works will be implemented through the use of a Construction Ecological Management Plan (CEcMP) and retained and created habitats will be subject to long-term management and monitoring in accordance with a Landscape and Ecological Management Plan (LEMP), to ensure that their biodiversity value is maintained and/or enhanced. Further information is provided in Chapter 9, ES Vol II and provided within Appendix 9, ES Vol III. Information is also

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CONSULTEE	COMMENT	WHERE ADDRESSED
		provided within the Arboricultural Impact Assessment in Appendix 3.1, ES Vol III.
	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.	Information is provided within the Arboricultural Impact Assessment in Appendix 3.1, ES Vol III.
	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 officers 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.*	A separate Sustainability Statement and Energy Strategy have accompanied the application. Chapter 3 Application Site and Proposed Development also discusses the proposed development's approach to its energy strategy and, lastly, Appendix 2.4 addresses the potential implications of climate change.
Bromley Council, Principal Planner (December 2018)	*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.*	This assessment is summarised in Chapter 10, Transportation & Access ES Vol II and provided in Appendix 10, ES Vol III.
Highways England (December 2018)	*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.*	Information is provided in Chapter 10, Transportation & Access ES Vol II, and provided in Appendix 10, ES Vol III.
	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.	These assessments are summarised in Chapter 10 Transportation & Access, Chapter 11 Air Quality and Chapter 12 Noise & Vibration, ES Vol II and provided in Appendices 10, 11 and 12 ES Vol III.
	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)*	This assessment is summarised in Chapter 10 Transportation & Access, ES Vol II and provided in Appendix 10, ES Vol III.
Historic England (December 2018)	*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.*	This is included in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8.2, ES Vol III.
	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).	This is included in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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).	This assessment is summarised in Chapter 8 Historic Environment, ES Vol II and provided in Appendix 8, ES Vol III.
	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*	This assessment is summarised in Chapter 8, ES Vol II and provided in Appendix 8, ES Vol III.

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CONSULTEE	COMMENT	WHERE ADDRESSED
	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.*	
Senior Archaeological Officer, Kent County Council (December 2018)	*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.* *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.*	The Senior Archaeological Officer's comments have been noted and addressed within Chapter 8 Historic Environment, ES Vol II and in Appendix 8, ES Vol III.

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CONSULTEE	COMMENT	WHERE ADDRESSED
	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.	
Ecological Advice Service, Kent County Council (December 2018)	*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.*	This has been addressed in Chapter 9 Biodiversity, ES Vol II and provided in Appendix 9, ES Vol III.
	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.*	This has been addressed in Chapter 9 Biodiversity, ES Vol II and provided in Appendix 9, ES Vol III.
	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).	This has been addressed in Chapter 9 Biodiversity, ES Vol II and provided in Appendix 9, ES Vol III.
	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.*	Ecological Management Plan (CEcMP) and retained and created habitats will be subject to long-term management and monitoring in accordance with a Landscape and Ecological Management Plan (LEMP), to ensure that their biodiversity value is maintained and/or enhanced. Further information is provided in Chapter 9, ES Vol II and provided within Appendix 9, ES Vol III. Information is also provided within the Arboricultural Impact Assessment & Tree Retention Report in Appendix 3.1, ES Vol III.
	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.	Noted. Please see previous comment.
	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.*	Noted. Please see previous comment on Ancient Woodland.
Principal Transport and Development Planner, Kent County Council (December 2018)	*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.*	A Transport Assessment and Travel Plan have been produced and are summarised in Chapter 10 and provided in Appendix 10.1, ES Vol III.
Lead Local Flood Authority, Kent County Council (December 2018)	*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.*	A Flood Risk Assessment and Surface Water Management Strategy have been produced and are summarised in Chapter 14 Water Resources & Flood Risk and provided in Appendix 14.1, ES Vol III
	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.	A Flood Risk Assessment and Surface Water Management Strategy have been produced and are summarised in Chapter 14 Water Resources & Flood Risk and provided in Appendix 14.1, ES Vol III
	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.	Noted.
Public Rights of Way Officer, Kent County Council (December 2018)	*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.'*	This is addressed in Chapter 7 Landscape and Visual, ES Vol II and provided in Appendix 7.1, ES Vol III.

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CONSULTEE	COMMENT	WHERE ADDRESSED
	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.	
	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.	The southern area of site is to be maintained as per previous application, please see the accompanying application plans provided in Chapter 3 Site Description & Development Proposals.
	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.	New public footpaths have been introduced into the application site as shown on the plans that accompany the application provided in Chapter 3 Site Description & Development Proposals.
	The National Planning Framework says under Promoting Healthy Communities: '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.'	As stated above, new public footpaths have been introduced into the application site as shown on the plans that accompany the application provided in Chapter 3 Site Description & Development Proposals.
Natural England (December 2018)	*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.*	This is included in Chapter 7 Landscape and Visual, ES Vol II, Appendix 7.1, ES Vol III, and in the AONB Report that accompanies the application.
	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.	This is included in Chapter 7 Landscape and Visual, ES Vol II, and Appendix 7.1, ES Vol III.
	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.	This has been addressed in Chapter 7 Landscape and Visual, ES Vol II, and Appendix 7.1, ES Vol III.
	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.	As per the assessment of significant effects in Chapter 9 Biodiversity and Chapter 7 Landscape & Visual, it is not considered that the proposed development significantly varies from that which was previously consented in the extant Outline Planning Permission.
Arboricultural & Landscape Officer, Sevenoaks District Council (December 2018)	*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.*	Landscape proposals are set out in the Design and Access Statement that accompanies the application. The Arboricultural Impact Assessment addresses the loss and retention of trees and the Framework Ecological Mitigation Strategy sets out how subsequent management of the site can be achieved, these documents may be found at Appendix 3.1 and Appendix 9, ES Vol III respectively.

2.4 PUBLIC CONSULTATION

Consultation Process

The proposed masterplan scheme has been consulted through an extensive pre-application process over the past two years, involving detailed discussions with SDC's Planning Department in addition to statutory and non-statutory consultees. In various instances meetings and/or discussions have been held with these consultees including the KCC as the Highways Authority and Local Education Authority, Historic England, Lead Local Flood Authority and Kent Downs AONB Board.

As part of the consultation process for the proposed development, a series of public consultation events was undertaken in January 2019, at 'The Canteen' (Building N10), Fort Halstead, Crow Drive:

- SDC Members (10th January 2019);
- Immediate Local Residents of Crow Drive (11th January 2019, 3pm–7pm); and
- Wider Public Consultation (12th January 2019, 11am–3pm).

Project Contact and Communication Channels

A consultation website was launched in December 2018 at:

https://www.jtp.co.uk/projects/fort-halstead

The website URL was advertised on the exhibition flyer alongside a freephone number for further information if required. Comments from the community were welcomed at the following email address: community@jtp.co.uk with comments encouraged to be submitted 4th February 2019.

However, the website remains open and comments were accepted up until submission of the planning application.

The website features the exhibition boards as well as a synopsis of the proposals, the background to the planning application and previous community engagement.

Public Exhibitions

A series of exhibition boards were presented, which set out the context and rationale for the proposals. Members of the project team were available to discuss the proposals, respond to any queries and receive feedback which may inform the proposals prior to submission of the planning application.

Across the two main consultation events held on the 11th and 12th of January 2019, approximately 200 people attended, including local Councillors. The majority of attendees were from the settlements of Halstead, Knockholt and Badgers Mount.

Following the public exhibition, the team undertook a collaborative design development process working with SDC, KCC and other key stakeholders which explored alternative designs to address some of the concerns which emerged from the consultation process.

2.5 SENSITIVE RECEPTORS

The sensitive receptors listed below have been identified in the vicinity of the application site. The assessments focus on identifying the effects of the proposed development at/on these receptors within the relevant chapters of the ES:

- Kent Downs Area of Outstanding Natural Beauty (AONB);
- Statutory Designated Heritage Assets:
  - The Fort Scheduled Monument (List Entry Number 1004214);
  - The Fort's three listed buildings - two Grade II* (Building F16 (the Bomb Chamber) and Building F17 (the Detonation Chamber), List Entry Number 1412293) and one Grade II Building F11 (the Experimental Filling Shed, List Entry Number 1412292);
  - Building Q14 (Grade II listed Penney Building) the only listed building outside the confines of the Fort;
- There are no further statutory designated heritage assets or conservation areas within 1km of the application site;
- Potential archaeological remains;
- Ecological receptors within or in close proximity to the site, including Ancient Woodland, grasslands, bats, dormice, reptiles, wintering and breeding birds;
- Residential properties surrounding the site (including but not limited to Armstrong Close 20m north of the site; Star House, Star Hill Road 250m south of the site; Rose Cottage, Farm, Birchwood Lane 95m west of the site; and The Cottage, Otford Lane 215m north of the site);
- Local social and community services, including primary schools, secondary schools, GP services and hospitals;
- The landscape character of the site and its surrounding environs;
- Tree Protection Order trees across the site;
- Sensitive receptors that would be brought to the site under the proposals, including site workers during the construction phase and those using/occupying the proposed residential properties, commercial and retail units, and community facilities, once operational.
- Locations within the pedestrian environment at the application site and in the surrounding area, including pedestrian routes, cycle routes, and roads;
- The application site lies within two character areas:
  - National Character Area: North Downs National Character Area; and
  - Landscape Character Area: Knockholt: Darent Valley.
- 16 viewing places (each comprising multiple views) where local, medium- or long-distance views of the proposed development are possible:
  - Viewing Place 1: Crow Drive looking south west;
  - Viewing Place 2: Crow Drive / FP SR97 looking south west;
  - Viewing Place 3: FP SR172 looking north;
  - Viewing Place 4: Star Hill Road looking east;
  - Viewing Place 5: FP SR172 looking south;
  - Viewing Place 6: junction of Morants Court Road / Pole Hill (A224), on the North Downs Way, looking north;
  - Viewing Place 7: Otford Lane looking south;
  - Viewing Place 8: FP SK690, to the north of Knockholt Pound, looking south;
  - Viewing Place 9: the edge of Dunton Green, on the Darent Valley Path, looking north;
  - Viewing Place 10: Hale Lane Recreation Ground, Twitton, looking east;
  - Viewing Place 11: Fackenden Lane looking south west;
  - Viewing Place 12: FP SR60, near Otford Mount, looking south west;
  - Viewing Place 13: near Otford Mount, on the North Downs Way, looking west;
  - Viewing Place 14: junction of London Road / Argyle Road, within Sevenoaks, looking north west;
  - Viewing Place 15: Knole Park / FP SU18, on the south-eastern edge of Sevenoaks, looking north west; and
  - Viewing Place 16: southern edge of Ide Hill / FP SR236, looking north.

2.6 TEMPORAL SCOPE OF ASSESSMENT

As described further in Chapter 5: Construction Strategy, the site enabling, demolition and construction works are anticipated to take place over an 11 year period, with site enabling anticipated to commence in 2020.

For the purposes of the ES, it has been assumed that the initial opening year is 2024 with full completion and operation of the development in 2031.

2.7 CUMULATIVE SCHEMES

The Transport Assessment was requested to consider one cumulative scheme: the West Kent Cold Store development (Ref. 09/02635/FUL).

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This scheme comprises 500 residential units, commercial units and a medical centre. The scheme is being marketed as Ryewood by Berkeley Homes and the sales website notes that Coppice Drive is the final collection of 2, 3 and 4 bedroom homes, all of which are listed as sold. As such, it is considered that the development is largely complete and therefore, its inclusion as a cumulative scheme in addition to any of its existing car movements that may have been captured by the baseline traffic surveys represents a conservative assessment.

This scheme has been considered by the transport, air quality, and, noise and vibration assessments on this basis. For the remainder of the assessments it has been considered to be already included within the baseline conditions.

No further cumulative schemes have been identified and no further schemes have been requested by SDC and other stakeholders during the EIA scoping stage and pre-application engagement.

2.8 THE ENVIRONMENTAL STATEMENT

In general, each of the technical chapters of this ES, provided in ES Volume II, is structured as follows:

- Introduction;
- Methodology;
- Baseline conditions;
- Potential significant impacts;
- Design interventions;
- Assessment pre-mitigation;
- Mitigation & enhancement measures;
- Assessment post-mitigation; and
- Inter-development cumulative effects.

The structure of the technical chapters – particularly the use of tables – has been devised to make the technical assessments better focussed and more accessible to readers, and to reduce the length of the main volume of the environmental statement.

Where information has been summarised in the tables, references are provided as to where additional information is provided in the technical appendices.

Where differences have arisen between the structure described below and that presented within a technical chapter (e.g. as a result of the biodiversity assessment being based on the IEEM guidelines rather than a standard receptor sensitivity versus impact magnitude approach), this is clearly explained in the chapter.

Introduction

This section provides details of:

- the company that has undertaken the technical assessment, as well as the author(s) and their professional qualifications;
- the purpose of the chapter;
- a list of figures supporting the assessment, which are provided together at the end of the chapter; and
- a list of all of the technical appendices that are relevant and referenced within the chapter.

Methodology

This section provides details of:

- the legislation, guidance, standards and policies that have informed the assessment;
- the consultees that have been contacted in preparing the chapter (e.g. technical officers at the local planning authority and officers at statutory consultees, such as the Environment Agency);
- the comments raised during scoping and a commentary on how the comments have been addressed within the assessment;
- where relevant, a description of how climate change, human health and risks of major accidents and disasters have been taken into account within the assessment;
- where relevant, any alternatives to the proposed development as set out in Chapter 4 Alternatives & Design Evolution that have been considered and assessed;
- Which assessment scenarios have been considered and through what means;
- any associated development (i.e. development which is required to facilitate the development but does not form part of the planning application, such as off-site utilities works) that is relevant to the assessment;
- how baseline conditions have been assessed (e.g. site visits/surveys/review of publicly available data) and the scale of sensitivity adopted within the assessment;
- how magnitude has been assessed – specifically whether there are any aspects of the project that are relevant to the assessment but not described in Chapter 3: *Site Description & Development Proposals* – and the scale of magnitude adopted within the assessment;
- how effect significance has been assessed (e.g. whether a matrix or some other approach has been adopted); and
- any assumptions or limitations.

Scenarios

There are two scenarios which will be assessed for each topic within the ES where relevant. These are:

- proposed development including the 1 Form Entry (FE) primary school; and
- proposed development without the 1FE primary school.

Land is to be safeguarded for the provision of a 1FE primary school which is required in the latter stages of the development to address the additional need for school places generated through both the redevelopment of Fort Halstead and the other site allocations in the surrounding area. It is not possible for the existing Halstead Primary School to expand to accommodate this need and therefore KCC Education have identified Fort Halstead as being the most suitable site for a school to be located.

Delivery of the school will be through KCC Education whilst the Applicant has safe-guarded the land. Given the 11 year build-out period of the proposed development, with the intent that the school is delivered during the latter stages of the development, it is feasible that circumstances may have changed such that the school may not be required at that time. In such an eventuality the school land would become commercial floorspace (within the maximum floorspace parameters) and the number of residential units delivered would be the full 750 units. By comparison, no fewer than 650 residential units are anticipated to be potentially delivered under the scenario where the school is provided.

Baseline Conditions

This section takes the form of a table that provides a list of:

- the key receptors that have been identified;
- a brief description of the baseline conditions relevant to the topic in question and the key receptors;
- the sensitivity attributed to each receptor; and
- where further details can be found within the relevant technical appendices.

Future Baseline Conditions

The 2015 extant outline planning permission (Ref. SE/15/00628/OUT) (2015 OPP) has been considered as the future baseline for the demolition, construction and operational phases of the proposed development. Therefore, the technical sections of this ES will also make reference to the potential for net effects in comparison to those originally identified for the extant permission.

Potential Significant Impacts

This section takes the form of a table that provides details of the potentially significant impacts of the proposed development, split by phase (i.e. construction or operation), and whether those impacts are likely to be adverse or beneficial in nature. It should be noted that the term 'construction phase' has been used within this ES to refer to both the demolition and construction activities proposed.

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Design Interventions

Design interventions constitute alterations to the proposals, made to lessen adverse effects and improve beneficial effects (e.g. the siting of a building so as to avoid particularly sensitive habitats within the application site boundary). They differ from mitigation measures as they are incorporated into the design of the proposed development and, as such, will be shown on the application plans; while mitigation measures are not shown on the application plans and will need to be secured by other means (e.g. via planning condition or Section 106 agreement).

This section takes the form of a table and lists the design interventions that have been made to address the potential significant impacts of the proposals, the reason(s) that the intervention was included and where further details can be found within the relevant technical appendices.

Assessment Pre-Mitigation

This section takes the form of a table and includes details of:

- whether the impact is relevant to the construction or operational phase of the development;
- the receptor(s) that are likely to be affected;
- the impact (including consideration of any design intervention);
- the magnitude of the pre-mitigation impact;
- the significance of the pre-mitigation effect;
- whether mitigation is proposed; and
- where further details can be found within the relevant technical appendices.

Mitigation and Enhancement Measures

This section takes the form of a table and includes details of:

- the phase during which the mitigation or enhancement measures will be implemented;
- the possible effect that is being mitigated;
- the mitigation and/or enhancement measure(s) being proposed;
- how each measure will be secured and when it will be triggered;
- the magnitude of the impact post-mitigation;
- whether the post-mitigation effect is adverse or beneficial; and
- where further details can be found within the technical appendices.

Assessment Post-Mitigation

This section takes the form of a table and includes details of:

- the phase during which the impact is applicable;
- the receptor(s) affected;
- the residual effect following the implementation of mitigation/ enhancement measures; and
- the significance of the effect and whether it is adverse or beneficial, short-, medium- or long-term, direct or indirect, permanent or temporary, and reversible or irreversible.

Inter-Development Cumulative Impacts

This section takes the form of two tables. The first table includes details of:

- the list of schemes identified through scoping as having the potential to result in inter-development cumulative effects alongside the proposed development;
- a brief description of the other scheme(s), including a statement on where it is in the planning/construction process; and
- a description of whether the scheme is likely to result in inter-development cumulative effects for the specific topic area under consideration.

For those cumulative schemes considered relevant to the specific topic, the second table includes details of:

- the phase during which inter-project cumulative effects may arise;
- the receptor(s) likely to be affected;
- any additional measures that are required to mitigate the identified inter-project cumulative effects; and
- the significance of the effect and whether it is adverse or beneficial, short-, medium- or long-term, direct or indirect, permanent or temporary, and reversible or irreversible.

In some instances, for example where the cumulative schemes are not of relevance to the specific topic, a second table is not presented but reference made to the preceding Section 'Assessment Post-Mitigation' table, as the residual effect assessment remains the relevant one.

2.9 ASSESSMENT OF SENSITIVITY, MAGNITUDE AND SIGNIFICANCE

Ministry of Housing, Communities and Local Government (MHCLG) Guidance suggests that it is advantageous to devise generic assessment criteria for determining the significance of effects that can be applied to all environmental topics considered within an ES. This ensures that, where possible, effects are assessed in a comparable manner.

Prevailing good practice suggests that environmental impacts should be considered in terms of the importance, value or sensitivity of receptors and the predicted scale, or magnitude, of the potential impacts. The significance of potential effects should then be determined through consideration of respective sensitivity and magnitude.

In line with MHCLG Guidance and prevailing good practice, each of the environmental issues within the ES will be assessed following the same general approach, whereby the receptor sensitivity and magnitude of impacts are taken into consideration in establishing the significance of effects. All identified effects will be assessed using the same significance descriptors, which will help to provide a direct comparison between the effects assessed under each chapter.

Where methodologies have been adapted from specific industry recognised guidelines, e.g. Landscape Institute and Institute of Ecology and Environmental Management (IEEM) Guidelines, an explanation as to the chosen methodology will be provided within the relevant chapter.

The standardised approach to the assessment of effect significance across the technical chapters is described below. Where assessments have diverted from this methodology, the alternate approach is described in the relevant chapter.

Receptors & Sensitivity

Receptors are defined as the physical resources or user groups that are subject to impacts. They have been identified through a combination of desktop studies and site visits undertaken by the various members of the EIA team. Further details are provided in each of the technical chapters, but sensitivity may depend on factors such as: rarity; quality; importance in an international, national, regional or local context and/or replaceability etc.

The sensitivity of receptors is considered as being 'very high', 'high', 'medium', 'low' or 'negligible'. A table is included within the methodology section of each chapter explaining the rationale for each of these criteria. A summary is then provided at the end of the baseline conditions section to draw conclusions relating to the perceived sensitivity of identified receptors.

Impacts & Magnitude

Impacts are generally understood to be the changes resulting from an action.

The magnitude of an impact is considered as being 'very large', 'large', 'medium', 'small' or 'negligible'. As with sensitivity, a table is included in each chapter explaining the rationale for each of these criteria. Where it is possible to do so, criteria are based on recognised standards and guidelines. Where this not possible, the criteria are based on expertise and professional experience.

Effects & Significance

Effects are generally understood to be the consequences of impacts. The significance of the effect is informed by the magnitude of the impact and the sensitivity of the receptor.

The assessment of significance within the ES is also considered using a common scale, with effects described as being 'major', 'moderate', 'minor' or 'negligible' (which also includes 'neutral' or 'no impact' assessments). Rather than prescribing a particular methodology (e.g. the use of a significance matrix), the method for ascribing significance is left

to the judgement of each technical consultant, so that it reflects best practice within their specialist area.

Broad definitions for each of these descriptors are provided below:

- **Negligible** - Effects which are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error, these effects are unlikely to influence decision making, irrespective of other effects.
- **Minor** - These effects may be raised as local issues and may be of relevance in the detailed design of the project, but are unlikely to be critical in the decision-making process
- **Moderate** - These effects, if adverse, are likely to be important at a local scale and on their own could have a material influence on decision-making.
- **Major** - These effects may represent key factors in the decision-making process. Potentially associated with sites and features of national importance or likely to be important considerations at a regional or district scale. Major effects may relate to resources or features which are unique and which, if lost, cannot be replaced or relocated.

Effects are generally considered to be 'Significant' where they are of 'Moderate' or 'Major' significance (either adverse or beneficial). The only exception is the assessments reported in the daylight, sunlight, overshadowing and solar glare chapter, where 'Minor' effects are also considered 'Significant'. This is discussed further within the chapter.

In addition to the significance of the effect, statements are also made as to whether effects are adverse or beneficial, direct or indirect, temporary or permanent, reversible or irreversible, short-, medium- or long-term and/or cumulative. Definitions and examples for each are provided below:

- **Adverse** – a harmful or unfavourable effect (e.g. the loss of trees to allow the construction of new buildings)
- **Beneficial** – a favourable or advantageous effect (e.g. the creation of jobs as a result of proposed construction works)
- **Direct** – an effect without intervening factors (e.g. the removal of trees to allow for the construction of new buildings)
- **Indirect** – an effect not directly caused by the development (e.g. changes to the pattern of traffic movements across the road network as a result of a new road being constructed)
- **Temporary** – an effect lasting only for a limited period of time (e.g. piling during construction)
- **Permanent** – an effect lasting or intended to last or remain unchanged indefinitely (e.g. land reclamation from the sea)
- **Reversible** – an effect that is capable of being reversed so that the previous state is restored (e.g. the removal of solar panels to revert to grazing pasture)
- **Irreversible** – an effect that is not capable of being undone or altered (e.g. gravel extraction)
- **Short term** – an effect lasting between 0 and 5 years
- **Medium term** – an effect lasting between 6 and 11 years
- **Long term** – an effect lasting more than 12 years
- **Cumulative** – increasing by one addition after another (e.g. traffic generated by different developments occurring in close proximity to one another)

2.10 TOPICS NOT REQUIRING INDIVIDUAL CHAPTERS

The EIA Regulations 2017 introduced new topics that need to be considered within the scope of an EIA. The topics include human health, climate change, land (for example land take) and the vulnerability of the development to risks of major accidents and/or disasters.

Stand-alone technical chapters are not proposed for these topic areas. Instead, where the risks of major accidents and/or disasters or effects of the development in relation to human health, climate change or land are relevant to a specific technical assessment, this has been stated and assessed within the respective ES chapter/report.

Further information on each of these topic areas and how they have been considered throughout the ES is provided below.

Climate Change and Greenhouse Gas Emissions

Where climate change is relevant to a technical assessment (e.g. flood risk) this has been stated and taken into account within the respective ES chapter/report.

A summary of key climate change projections within the UK are set out below.

The following have been considered in each of the technical chapters/reports within the context of the outlined climate change projections:

- The vulnerability of the baseline environment to projected changes;
- The vulnerability of the proposed development to climate change; and
- The effect of the proposed development within the context of climate change.

If climate change does not affect the assessment of the technical discipline, this has been stated.

Summary of Climate Change Projections

Key climate projections for the UK are as follows:

- Summers will become hotter and drier;
- Winters will become milder and wetter;
- Soils will become drier on average;
- Snowfall and the number of very cold days will decrease;
- Sea levels will rise; and
- Storms, heavy and extreme rainfall, and extreme winds will become more frequent.

All have been considered and determined to not present a potential risk. Therefore, no significant climate change effects are considered likely as a result of the proposed development.

In addition, a technical report addressing the implications of climate change and greenhouse gas emissions in regard to the proposed development is provided at Appendix 2.4, Vol III of this ES.

Human Health

Many technical chapters/reports already address the potential implications of their topics on human health by virtue of set target values or objectives (e.g. contaminated land, air quality or noise) based on human health tolerances or through the consideration of policy requirements and targets promoting healthier behaviours (e.g. active travel such as cycling and walking). Where relevant, it has been stated within each ES chapter how the respective technical assessment takes these factors into consideration. Relevant literature or studies, which draw upon the human health outcomes anticipated as a result of the use of these targets, will be referenced where necessary. For example, with regard to air quality, the limit values are informed by guidelines set by the World Health Organisation (WHO) and therefore, the WHO air quality guidelines would be referenced with regard to the potential impacts on human health.

In addition, a technical report addressing the implications on human health in regard to the proposed development is provided at Appendix 2.5, Vol III of this ES.

Risk of Major Accidents and/or Disasters

For major natural disasters, those that were considered to propose as material risk in the UK and to the proposed development were storms, extreme temperatures, flooding and droughts. In relation to major accidents and man-made disasters, vehicle accidents and QinetiQ operations were identified to propose a material risk.

All have been considered and determined to not present a potential risk and therefore no significant effects are considered likely.

A technical report addressing the implications of potential major accidents and disasters in regard to the proposed development is provided at Appendix 2.6, Vol III of this ES.

2.11 ASSESSMENT OF CUMULATIVE EFFECTS

Cumulative effects can be either:

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- The combined or 'inter-development' cumulative effect of the proposed development together with other existing or reasonably foreseeable developments (taking into consideration effects at both the construction and post-construction/operational phases); and
- The combined, synergistic or 'intra-development' cumulative effects caused by the combination of a number of effects on a particular receptor (taking into consideration effects at both the construction and operational phases), which may collectively cause a more significant effect than individually.

Where relevant, inter-development cumulative effects are described within each technical chapter. Intra-development cumulative effects, meanwhile, are considered within Chapter 15: Cumulative Effects.

As previously discussed, through consultation with SDC and the Highways Authority just one cumulative scheme for the Transport Assessment was identified, the West Kent Cold Store, although this is understood to be largely built-out and completed.

The potential for the scheme listed above to produce inter-project cumulative environmental effects alongside the proposed development will depend on the nature of the effect in question. As such, the identified scheme has been included in the inter-development cumulative assessment in every technical chapter, and its consideration has been limited to transport, noise and vibration, and, air quality, by virtue of its inclusion in the traffic data.

2.12 REPORTS/ASSESSMENTS RELATING TO 'SCOPED OUT' ISSUES

While a number of environmental topics have been scoped out of the ES, relevant surveys/assessments undertaken as part of the application process have been included within the technical appendices (**ES Volume III**) for ease of reference:

- Arboricultural Impact Assessment & Tree Retention Report (**Appendix 3.1**);
- Fort Halstead Summary Lighting Assessment 2019 (**Appendix 3.2**)
- Lighting Assessment 2015 (**Appendix 3.3**); and
- Slope Stability Report (**Appendix 3.4**).

2.13 OVER-RIDING DIFFICULTIES

No over-riding difficulties, such as technical problems or lack of know-how, were encountered during the preparation of this ES that significantly reduces its ability to fulfil its purpose.

Any minor difficulties experienced and/or assumptions made during the completion of individual surveys/assessments are discussed in the methodology section of the relevant technical chapter(s) and the relevant technical appendices.

2.14 WORKS CITED

[1] Institute of Environmental Management and Assessment, "Special Report – The State of Environmental Impact Assessment Practice in the UK," 2011.

[2] HM Government, "The Town and Country Planning (Environmental Impact Assessment) Regulations 2017," London, SI 2017/571, 2017.