

From: SVEN ROYALL [REDACTED]
Sent: 31 March 2021 18:20
To: Planning Comments
Subject: Fwd: Amended Application—proposed development at Fort Halstead. Reference 19/05000/HYB

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Apologies for the mistype!

Begin forwarded message:

From: SVEN ROYALL [REDACTED]
Subject: Fwd: Amended Application—proposed development at Fort Halstead. Reference 19/05000/HYB
Date: 31 March 2021 at 18:06:44 BST
To: planning.comments@sevenoakd.gov.uk, claire.shearing@sevenoaks.gov.uk
Cc: planning.policy@sevenoaks.gov.uk, "Cllr Fleming, Peter" <cflr.fleming@sevenoaks.gov.uk>

Dear Claire Shearing,

Thank you for your letter dated 22nd March inviting comments on the recent, further amended, application to exploit Fort Halstead. Please find below my comments on this amended proposal, together with a resubmission of the comments sent on the previous proposal in July 2020.

- 1.) I believe the main changes as summarised in your letter do nothing to address or mitigate any of my previous comments and so I should be grateful for your confirmation that my earlier advice will be considered as part of your decision process.
- 2.) A main concern continues to be the misleading attempt to designate Star Hill as a "Secondary" access/egress point with no clear explanation of what the subordination means or is intended to mitigate or why you would resile from your earlier principled position: *"before the development could proceed, we require details to show how the Star Hill access would be restricted and maintained for use only by buses, emergency vehicles, cyclists, pedestrians and horses".*
- 3.) This new revision is described as an "outline" application with very limited detail or specificity on what the changes would achieve with regard to the Built Form. Is the 27,773 sqm GEA over and above what is being retained and does this create a redundancy in usage that is intended to provide a springboard for subsequent development that has not been disclosed?
- 4.) This proposal needs to be set in the context of numerous planning proposals for development in and around Knockholt and Halstead which will have the cumulative effect of destroying the openness and character of these rural villages. The combined effect will be to create a ribbon, or corridor, development and (in aggregation) lead to a risk of urban sprawl - all in direct contravention of the Green Belt protection measures enshrined in Section 13 of the National Planning Policy Framework (NPPF) and in the Sevenoaks Allocations and Development Management Plan.

5.) In checking disclosures on residual contamination, I have become increasingly concerned at the continued silence on contamination caused by past research at Fort Halstead on depleted Uranium projectiles and other projects involving radioactive materials. I trust you will take all necessary steps to investigate these activities and to provide reassurance that the site does not contain contaminated areas (for example drains) not only of spent Uranium but of other contaminants such as Cadmium and Lead (more generally Persistent, Bioaccumulative and Toxic materials).

For the avoidance of doubt, I have material concerns on, and objections to, this "outline" proposal, not only what is planned on the the site itself but also on the significant adverse impact of the consequent logistics that will overwhelm the surrounding Green Belt residents.

Best wishes
Sven Royall

----- Original message -----

From: Alison Salter <Alison.Salter@sevenoaks.gov.uk>

Date: 24/07/2020 13:14 (GMT+00:00)

To: SVEN ROYALL [REDACTED], DC North

<dc.north@sevenoaks.gov.uk>, Planning Policy

<Planning.Policy@sevenoaks.gov.uk>, "Cllr Fleming, Peter"

<cllr.fleming@sevenoaks.gov.uk>

Subject: RE: Amended Application—proposed development of 635 houses at Fort Halstead. Reference 19/05000/HYB

Mr Royall,

Thank you for your comments on this application. We will add your comments to this application and take them into account in our assessment. We are currently out to consultation, and are seeking the views of residents and consultees, including KCC Highways. You will be able to view these comments when they arrive, by looking on Public Access. The easiest way to view these comments is by inputting the reference number into the search box on the Council's website, and selecting planning applications and search. This takes you directly to the public records for this application. The application will be considered at a future meeting of the Development Control Committee.

Regards,

Alison Salter
Development Manager

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

This advice is without prejudice to the decision making processes of the local planning authority and in no way prejudices any future determinations or decisions made by the local planning authority.

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

Tel: 01732 227000

Email: alison.salter@sevenoaks.gov.uk

Online: www.sevenoaks.gov.uk

From: SVEN ROYALL [REDACTED]
Sent: 24 July 2020 12:09
To: Alison Salter <Alison.Salter@sevenoaks.gov.uk>; DC North <dc.north@sevenoaks.gov.uk>; Planning Comments <planning.comments@sevenoaks.gov.uk>; Planning Policy <Planning.Policy@sevenoaks.gov.uk>; Cllr Fleming, Peter <cllr.fleming@sevenoaks.gov.uk>
Subject: Amended Application—proposed development of 635 houses at Fort Halstead. Reference 19/05000/HYB

Dear Sir/Madam,

Further to Claire Shearing's letter dated 6th July 2020 I wish to comment on the latest amended consultation now involving the proposed development of 635 homes at Fort Halstead.

For the the residents of Knockholt, Halstead and surrounding villages who will be adversely affected by this egregiously disproportionate development on Green Belt land, the latest amendment is a disappointing continuation of a dangerous "game" that has been played over several rounds involving a succession of developers who keep ratcheting up their demands and re-submitting proposals until they wear down all opposition and get the answer they want.

As a recapitulation::

- **2011**—Fort Halstead was addressed by Sevenoaks District Council (SDC) in its Core Strategy. An SDC news release in January 2011 stated: "As part of its development, the Core Strategy was examined at a public inquiry last October, held by the Planning Inspectorate. Planning agents acting on behalf of the owners of Fort Halstead tabled a proposal to re-allocate the site for a residential development of up to 1,000 homes with local facilities.

"Sevenoaks District Council did not support this proposal and it was opposed by the Kent Downs AONB Unit at the inquiry. The Planning Inspector rejected the proposal. The Inspector said the site was **not in a sustainable location** as its inhabitants would have to travel a considerable distance to

access transport, shopping, and other facilities and that the development was not needed to meet the District's future development requirements.” No-one has explained what material change has occurred since then to mitigate the proposal. SDC concluded: “In practice, this means that large-scale housing development at the site is unlikely to be granted planning permission,”

- **2014–2015**—Just three years later, SDC reneged on that decision employing a novel “term of art”: ‘*Employment-led*’. SDC’s updated Core Strategy now viewed Fort Halstead as “*a Major Employment Site in the Green Belt and a Major Development Site.*” . a novel twinning of Green Belt with Major Employment/Development Site.

This ‘Redevelopment of Fort Halstead’, as it was called, was adopted by SDC in 2015, which supported the about turn with the following clear and firm stipulations:

- “Redevelopment proposals will be expected **to achieve a range of employment uses** ... and generate at least the number of jobs that the site accommodated immediately prior to the announced withdrawal of DSTL from the site.
- “Residential development of **up to 450 units may** also be permitted, provided it forms part of a mixed use scheme that delivers an **employment-led development**. The inclusion of **appropriate community facilities and infrastructure** to support the sustainable development of the site consistent with the policy **will be required.**”

SDC included the proposal (15/00628) in its local development plan—despite huge opposition—and subsequently granted planning permission for it in December 2015.

The applicant undertook to honour the following obligations:

- build 450 one to five-bedroom houses, of which 15% to 20% would be affordable housing;
- a 3.6 hectare business park providing 1,026 jobs + 10.2 hectares for QinetiQ’s ongoing operations providing approximately 250 jobs;
- another 131 jobs at the 0.6 hectare village centre;
- an 80-bedroom four-star hotel on 1.6 hectares, providing 76 jobs;
- a village centre and green with a small shop and community space, which could include a crèche and surgery;
- a military heritage museum and retention of the existing Fort scheduled monument.
- **Grand total—1,483 jobs**

2015–2020—During the past five years this already intrusive scheme has grotesquely grown in scale and ambition. Initially a threat of an additional 300 houses (the usual softening up tactic so that the number can subsequently be

conceded to yield a smaller increase) “employment-led” seems to have been returned to the weasel words scrapheap along with many of the other obligations that apparently justified the 2015 proposal. SDC should have shown a smidgen of resolve in reaffirming the requirements which we were assured in 2015 would be maintained

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And so to the next round of the “Game” : A ‘drop’ from 750 to 635 houses—**ie: an *INCREASE*** of 185 houses/over 40% on the 2015 ‘employment-led’ permission—with a few minor amendments such as a reduction in some building heights and some housing density. On the latter, you will be aware that the existing density locally is 15 to 18 dwellings per hectare (DPH): this application’s density is **25 to 50 DPH**...

The current development would create a village far bigger than Knockholt or Halstead; potentially home to around 2,500 people, and probably 1,500+ cars! Again what happened to the ‘**appropriate community facilities and infrastructure**’ you demanded in 2015?

I am particularly concerned with road safety, especially as the existing minor access point on Star Hill Road has become integral to this new amendment. ‘Condition 14’ of the 2015 permission included a vital duty of care that: *‘before the development could proceed, we require details to show how the Star Hill access would be restricted and maintained for use only by buses, emergency vehicles, cyclists, pedestrians and horses’*.

The current flimsy excuse to ignore this seems to be that Kent County Council has supervened - ironically because of the request to increase the number of dwellings. As anyone who uses Star Hill regularly will know:

- it is badly maintained; has no footpaths; is narrow; has a series of completely blind bends; is much favoured by cycling clubs because of its hilly challenge; has been the scene of numerous accidents;
- is totally inadequate to cope with the potential 1,500+ new cars, as well as heavy goods vehicles/delivery vans likely to service the 635 homes;
- and if this access is allowed, it will turn Knockholt and surrounding villages into rat runs with all the dangers that will bring.

The Star Hill Road exit is described as ‘secondary’ in this amendment, but no measures are in place to define that. Throughout Fort Halstead’s operational history, even during peak employment years, this exit has *always* been restricted. It would be extremely dangerous to allow free flowing traffic to use this exit onto a derestricted road. Visibility is limited and traffic from the north is on the brow of a blind hill. Any proposed speed limits on Star Hill Road are unlikely to slow approaching traffic and will have no effect on the condition of this road, as described above. The traffic calming measures newly proposed on the Fort Halstead site will not significantly deter traffic

from heading to the Hill and measures on the site have no mitigating effect whatsoever once the vehicles are on the Hill. It is perplexing logic that, having accepted in 2015 that Star Hill should be restricted in use, the latest proposal now intends to open it up to accommodate the increased traffic flow that was the very reason for restricting its access in 2015!!

As for the traffic estimates that supported the 2015 application:

- At Knockholt Parish Council's (KPC) planning committee at the time a councillor accurately described them as an insult to the intelligence of everyone living in the area;
- Like the KPC, the Society had, and has, absolutely no faith in the figures provided by that traffic survey, whose findings were and are an insult to residents who know this area extremely well;
- The increase in traffic then predicted for the 450-home development at peak times of 26 vehicles was absurd. Today, with the increase in traffic, it's a preposterous fiction.
- As highlighted in D. Barton's report in 2015, this was (and is) a development remote from essential services—car ownership will be essential.

COVID-19 has shown all of us just how important Green Belt land, the environment, and the ability to access open spaces is for this, and future, generations.

Can I also remind you of what SDC leader Peter Fleming said (*In Shape* issue 114, Spring 2020, page 22) about the Local Plan: "*While we consider our options, one thing is certain; we will continue to stand up for our residents and our environment.*"

Please have the courage to mean what you say. Do not approve this amended travesty.

Yours

Sven and Penny Royall

Knockholt

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