

SEVENOAKS DISTRICT COUNCIL
PARISH /TOWN COUNCIL PLANNING APPLICATION
CONSULTATION RESPONSE

Reference :	SE/19/05000/HYB
Site :	DSTL FORT HALSTEAD CROW DRIVE HALSTEAD TN14 7BU
Proposal :	Hybrid application comprising, in outline: development of business space (use classes B1a/b/c) of up to 27,773 sqm GEA; works within the X enclave relating to energetic testing operations, including fencing, access, car parking; development of up to 635 residential dwellings; development of a mixed use village centre (use classes A1/A3/A4/A5/B1a/D1/D2); land safeguarded for a primary school; change of use of Fort Area and bunkers to Historic Interpretation Centre (use class D1) with workshop space and; associated landscaping, works and infrastructure. In detail: demolition of existing buildings; change of use and works including extension and associated alterations to buildings Q13 and Q14 including landscaping and public realm, and primary and secondary accesses to the site.
<input type="checkbox"/> Support	
<input checked="" type="checkbox"/> Objection	<p>We think it is unreasonable to expect comments on a project of this magnitude within three weeks but we strongly object to the amended proposal for the following reasons;</p> <ul style="list-style-type: none"> - The housing density based upon dwellings per hectare is far too vague since actual dwelling size remains unspecified and hence the likely population density per hectare is unspecified. - Star Hill access is both dangerous and impractical. No traffic predictions included. - Covid lockdown has demonstrated viability of large scale homeworking hence planning targets now need major revision to incorporate the conversion of redundant commercial and office space to meet the domestic targets. <p>Infrastrucure already in place for these easy conversions along with use of existing transport links.</p>

With regard to the Local Plan hearings in autumn 2019, the Inspector raised the following points about the Fort Halstead site, and we quote:

Q340. Is the proposed housing allocation deliverable and/or developable in accordance with the housing trajectory? In particular, is it:

(b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

(c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

Q341. What are the exceptional circumstances for removing this proposed site from Green Belt?

Q342. Has full consideration been given to the impact of this development on the Green Belt?

Q343. Has full consideration been given to the impact of this development on the AONB?

Q344. Has full consideration been given to the impact of this development on local wildlife, biodiversity, ancient woodland and existing local infrastructure, services and facilities, including GP surgeries and schools?

She obviously had serious concerns regarding each of these points which still need to be addressed.

With particular respect to Q 340(b) and (c) and to Q 344 we would raise the following points:

In SDC's own Site Allocation tables handed out in Week 2 of the Hearing, the 'Combined Population, Services, Green Belt and Employment Scores' for the settlements of Knockholt, Halstead and Badgers Mount, were 20, 15 & 7, placing us in the 'Small Villages' and 'Hamlet' classifications respectively, the low scores relating to the already existing situation of population, services, Green Belt and employment for the 3 settlements and clearly demonstrates inability to sustain the proposed massive increases.

The 'carrot' of improvements in infrastructure is a 'smoke and mirrors' concept as local transport links are severely limited by the inability to increase rail services in the foreseeable future (nothing before 2045?), as stated by Network Rail. Local bus services have been slashed, local major roads are already congested and village lanes, some little more than single track, just could not cope. The proposals, far from bringing benefits to the area, will destroy established rural communities and affect large areas of Green Belt and AONB with their ancient woodland and rich biodiversity.

It is clearly stated that larger development should be associated with higher tier settlements, also that new housing should correlate with 'local need' but it does not! The Allocations policy appears to fly in the face of these concepts by failing to share the load proportionately among the various ranks of settlements in the district.

Fort Halstead already has outline planning permission as an employment led development for 450 homes. If development is to comply with the stated intention to keep new housing densities in line with the existing settlements (ours are currently 18.8 dph) even the current proposal for a reduction in dwellings to 615 represents an uplift of a further 165 homes on top of an already inappropriate 450, a totally unacceptable prospect and further proof that this would be overdevelopment with an average housing density of 38.35dph.

In 2015 when permission was granted for the 450 homes a comprehensive report by Waterman revealed widespread contamination of the site, with at least 38 of the sampled areas being considered above acceptable levels for residential use. Their supplementary report on Remediation required extensive measures to protect construction workers and to ensure that levels would be such that the known routes of transfer of toxic substances (direct/indirect ingestion, dermal contact, inhalation) to future site occupants/visitors would be acceptable - even though they classified the risk as 'low'! If soil and/or made ground needs to be removed from the site, local residents have serious concerns about the environmental risk of spread of any toxic materials during disturbance and transport through the area.

It is of particular concern that during the past 30 years there have been at least 6 cases of Guillain Barre syndrome in this small area, a rare but severe neurological condition that is only expected to occur in 1.2-1.5 people in 100,000 - therefore six cases in a combined local village population of approximately 3,500 is way beyond the predicted normal incidence. It is known that this condition can result from exposure to certain viruses and some chemical agents, such as mustard gas. We leave the planning officer to make their own conclusions.

In the outline-approved 450 home scheme, the main access is at the North of the site, but there is only limited use (public transport, utility vehicles, cycles and pedestrians) of Star Hill Road to the South West. Locals are aware of the dangers of this steep hill with its sharp bends, having witnessed two fatal accidents in recent memory, and it is frequently impassable in wintry conditions. It is essential that this access remains restricted, otherwise to avoid the inevitable and already existing congestion on the major roads, drivers will divert through the narrow roads and lanes of our villages, not only causing gridlock, but also contributing to climate change through increased air pollution.

It is common knowledge that people will use the hospitals nearest to them and at the Princess Royal, the nearest hospital to the site, facilities were already overstretched, particularly the A/E Department, due to lack of beds - even prior to the Covid 19 crisis, and some GP surgeries have closed their lists or even closed completely. The potential large numbers of new residents will certainly not travel long distances to hospitals to the South of the district when the PRUH is 10 to 15 minutes away, so will inevitably add to the pre-existing problems. The offer of on-site facilities does not guarantee a service if the NHS cannot staff them. The Rydale development at Dunton Green is a typical example, no medical facility, just more dwellings!

Another serious infrastructure concern is the totally unreliable water supply at the Fort and the pre-existing local housing. There have been multiple supply failures over the years, the more recent ones include lengthy losses of supply to residents, the latest last year for in excess of thirty weeks, with households having to rely on bottled water.

	<p>We fully endorse the comprehensive structured objection from the Knockholt Society and also the objection from Shoreham Parish Council, both of which present irrefutable points for consideration.</p> <p>In summary, we request that this application be put on hold pending clarification of the above points especially a major revision of the SDC housing needs / availability as a result of the impact of Covid 19 on home working and the resultant large surplus of commercial space.</p>
<input type="checkbox"/> <p>No Comment/ Comments Only</p>	
<p>FROM:</p>	<p>Zoe Brookman Clerk to Knockholt Parish Council</p>
<p>DATE:</p>	<p>27th July 2020</p>