

SEVENOAKS DISTRICT COUNCIL
PARISH /TOWN COUNCIL PLANNING APPLICATION CONSULTATION RESPONSE

Reference :	19/05000/HYB
Site :	DSTL Fort Halstead Crow Drive Halstead
Proposal :	<p>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. This application has now been amended, and a summary of the main changes are set out below:</p> <p>The applicant has provided an amended demolition plan, demonstrating the retention of buildings X23, X47, X76 and X77 which were previously proposed to be demolished, and the demolition of buildings X43.1 and X43.2.</p>
<input type="checkbox"/> Support	
<input checked="" type="checkbox"/> Objection	<p>Objections that DGPC has submitted to previous guises of this application remain valid and the Parish Council would like these to be considered. The Parish Council submitted objections on 24th July 2020 (and included within that response objections from 2019) - these are copied below:</p> <p>Dunton Green Parish Council continues to have concerns about this application. The concerns that the Parish Council has regarding the November 2019 version of this application remain (and are listed below for reference).</p> <p>The reduction in the proposed number of dwellings is largely welcomed but the revised number of 635 homes still represents a significant increase to the 450 homes that have been previously approved. There is a continuous thread of argument for the development in the revised documentation using the fact that the number of dwellings in the revised application is reduced and therefore represents an improvement. Allegedly this addresses several the concerns raised in 2019, in so far as it reduces the impact of the development on the Green Belt and on the AONB. However, the reduction is only versus the 750 dwellings as proposed in the original guise of this application and it is not acknowledged that, overall, the revised application still represents an increase in residential development of 185 dwellings.</p> <p>The application is also defensive about affordable housing: the inference being that with a reduced number of dwellings available, it might not be economically viable to meet in full the 40% quota of social housing. In relation to the Local Plan, the total number of homes falls short of the Government's target figures . Even acknowledging that there</p>

can be debates about the credibility of the Government's figures ad infinitum, what is clear, and surely cannot be disputed, is that there is a definite need for affordable local housing. Social housing numbers should be non-negotiable. The reduced density is welcomed although there is still plenty of room for further improvements in this area.

Another central core of this proposal is that it is an employment led development and there has been a slight increase in the area set aside for commercial development. However, the Covid-19 lockdown has forced many organisations to have their staff work from home and re-evaluate their ongoing needs for commercial premises. Arguably, the Sevenoaks District already has an over supply of commercial premises. From experience with the development of the West Kent Cold Storage site in Dunton Green, the need for commercial development (which was originally included within the application for Ryewood) was not proven and the space that had originally been earmarked for commercial use has subsequently been developed as additional residential units, over and above the number originally planned for the development. What real evidence is there of demand for commercial development on the Fort Halstead site? And what guarantees would there be, should commercial development not be required, that this space would not then be turned over to the provision of more residential units?

It is stated in one of the documents that rather than the proposed 252 trees to be felled, the revisions will now only see the loss of 210 trees. Whilst this is a reduction it is still the loss of a significant number of trees and is not acceptable.

There is now a proposal for an area of land to be reserved for a school, but the developer is not able to realise the commissioning of a school. That is entirely at the behest of KCC who seem to have very little idea about what demand there is for schools, especially in light of the Local Plan being contested. The Section 106 Agreement for Dunton Green's Ryewood development promised many things that, ultimately, **were not in the gift of the developer**. A new medical centre was included in the DG proposal. The local Clinical Commissioning Group took the money having been unable to get a local surgery interested (and indicating that there was insufficient demand to make it viable). Money was set aside for education (and was given to KCC). It can only be spent in a very limited geographical area and yet that money has not been spent as KCC says it is for expansion only and it is unprepared to commit until the Local Plan situation is resolved. This means that money that could have been used in Dunton Green is sitting in the coffers at KCC rather than providing any educational benefit to the local community. Surely it is better to refurbish and extend Dunton Green's existing school than leave it to languish in the hope that in a decade's time there will be a new school at Fort Halstead? Commercial space was also to be part of the Ryewood development. That area (and the proposed site for a medical centre) has been used for additional residential dwellings instead. If the school site is not used for that purpose, will it become an area for more residential development?

Communal parking simply does NOT work. The lack of parking provision, from bitter experience on the Ryewood development in Dunton Green, creates serious ongoing issues. There are constant complaints about people parking in the wrong place, that there are insufficient parking spaces (indeed, many residents would have preferred the space that had been allocated for commercial development to be used for additional parking rather than more dwellings, such is the problem). And the issue has spilled out through the village, with Ryewood residents parking in other areas of the village and exacerbating pre-existing issues with lack of on road spaces. It is Dunton Green Parish Council's contention that whatever the recommended levels for parking, there should be dedicated parking spaces per bedroom per dwelling (so 2 beds, 2 spaces; 5 beds, 5 spaces), if parking is not to become an inherent unresolvable issue at Fort Halstead, should the development go ahead.

Bus routes: there is no evidence that provision of bus services is a solution to mitigate the number of vehicle journeys being undertaken from a development. And, realistically, they are difficult to sustain. Again, as the recent experience of Ryewood has given Dunton Green Parish Council, services are initially funded by the developer. The uptake is not what it needs to be to ensure that the new service is economically viable in the long run and the routes end up being unsustainable.

Should the development go ahead, there must be an assurance that the construction traffic will not travel on the A224 through Dunton Green. The village already has to withstand diversions from the A21 and M25 and the impact of that traffic. There must be mitigation for Dunton Green in the future to deal with the additional journeys this will generate.

Reasons (AS PER 2019-11 RESPONSE FROM DGPC):

Dunton Green Parish Council has strong objections regarding the size of the residential and commercial development now proposed – the intensification of the site is increased significantly in comparison to the outline permission already granted for 450 homes. The impact of a total of 750 dwellings and all the other development associated with this plan will have a serious and detrimental effect on neighbouring parishes.

Indeed, a significant area of the proposed development lies within the parish of Dunton Green; Dunton Green is not an adjoining or neighbouring parish, it is a parish directly impacted by these proposals and a large part of the application area lies within Dunton Green’s boundaries.

School

Of particular concern to Dunton Green Parish Council is the promise of a new one form entry primary school on the site. Dunton Green’s experience of meaningless promises from developers (the proposed medical centre at Ryewood) are still raw. This is yet another promise by a developer which it actually has no power to provide; a third party has the final say (It was the West Kent Critical Commissioning Group in Dunton Green for the promised medical centre and it is KCC in this instance in relation to the promise of a new school). Dunton Green has seen no investment in its primary school despite in excess of £250k being given to KCC for education purposes as a result of the Section 106 Agreement for Ryewood. What evidence is there of need for a new school? Why can’t money be spent on the schools in Halstead, Dunton Green, Knockholt to accommodate demand (a number are consistently undersubscribed)?

Redacted Information

There is far too much redacted information within some of the documents; it renders them useless to the reader – they quite literally tell you nothing in some instances. The Financial Viability Assessment is one such document. Presumably there is a significant amount of financially sensitive information (and we acknowledge the need to redact some information) but the redactions are so extensive as to make the document a nonsense.

Environmental Impact Assessment – Vol I Non-Technical Survey

P8 School

It is noted that land is to be ‘safeguarded’ for a school which may or may not be provided. What are the plans if the school is not required? Will additional residential units be filling that space? Or more commercial premises? Again, DGPC is concerned about the aspirational nature of claims; experience in Dunton Green is that promised services do not come to fruition, largely because the developers themselves are simply not in a position to guarantee that those responsible for such services will ensure that the offers are taken up. It is also somewhat aspirational

Environmental Impact Assessment – Vol I Non-Technical Survey

P9

There is a reference to the development of West Kent Cold Storage which indicates that the development has 500 dwellings, a medical centre and commercial units. Planning permission was originally granted for the latter two items but they have not materialised. To continue to refer to the development as having a medical centre and commercial units (both of which proved to be uneconomic, allegedly) is wrong and should be corrected.

P12 medical facilities

As with Ryewood, a building is promised within the proposal for GP services but there is no guarantee that the offer will be taken up by the governing authority/agency. It is NOT within the developer’s gift to provide a medical centre. When this was being reviewed for Dunton Green there were no local surgeries will to take on a satellite surgery and the Clinical Commissioning Group at the time simply took the money in lieu of the building.

Where have the commercial activities and employment figures come from? Commercial units have not proved especially attractive in recent development in the District. Why would Fort Halstead buck that trend?

Design & Access Statement

P16 Map identifying site location and parish boundaries.

A significant proportion of the development lies within the parish boundary of Dunton Green, including the bulk of the so-called ‘village centre’ and a significant proportion of the residential development. Dunton Green has taken the brunt of social housing in the

district for several years and the parish does not want more within its boundaries. The village is already threatened with a further 250 homes on land adjacent to its recreation ground (albeit this development has, at this stage, been removed from the Local Plan) and this Fort Halstead proposal indicates that there will be a significant amount of building in Dunton Green. The development that is identified within the Dunton Green parish boundary should not include a high proportion of social housing – other parishes across the district need to start shouldering some of the burden.

P31 Onwards: 3.5 Local Character Assessment

It is astounding to see that even though a large area of this proposal falls within the parish of Dunton Green, Dunton Green is not included in the villages described in the Character Assessment pages. It is clear that 'prettier' villages, such as Otford, have been appraised when villages that are actually affected (and whose character should be of importance to the new development) have been excluded. Why is this?! Interestingly, Ryewood is included in new developments section of this section with very little indication that it is actually IN Dunton Green. It is not in Sevenoaks, it is not in splendid isolation, it is an area of Dunton Green. Dunton Green is completely excluded in the list of reviewed settlements on page 46.

P119 Innovation and Education Hub

All very aspirational but what evidence is there is of need given that some key local schools are currently undersubscribed. And, as with the medical facility, a promise of a building falls far short of guaranteeing that a school will be provided. Dunton Green Parish Council remains concerned that its village school continues to be neglected by KCC and that the promise of a new school will be more attractive to KCC than investing in its existing local schools.

P145 Community Bus

Presumably the developer will be funding the introduction of a new service but for how long? And what will happen if, as is likely (based on the experience of the community bus introduced for Ryewood), it proves not to be economically viable? Will the service then be lost? Is this not a short term gimmick rather than a realistic review of transportation requirements not just for Fort Halstead but for the local area and how they will be provided longer term, regardless of economic viability?

General Observations

The so-called 'village' centre looks like a university campus, not a village centre. It is much more of a commercial hub and has certainly lost any 'village' feel now that there is no village green at the centre of such an area.

Construction phase impacts on neighbouring villages? What is practically to be done by the developer to mitigate the impact of what will be years of construction?

Dunton Green Parish Council's view is impacted by experience. There are many similarities within this proposal of how wonderful the development will be and all the services that will be provided but they came to nothing in Dunton Green. The developer will return at some stage in relation to this application and say that the economy has changed and things are no longer economically viable.

Car Parking

Whilst guidelines may indicate that 1.5 spaces per dwelling is an adequate provision for car parking this is clearly nonsense and a recipe for issues once a development is inhabited. The Ryewood development in Dunton Green is an example of woefully inadequate parking provision which has caused and continues to do cause day to day issues for residents not just of the development but in neighbouring roads. This Fort Halstead proposal shows less evidence of adequate & realistic parking provision than previous applications. The developer should not be satisfied to have provided only the minimum, which is undoubtedly insufficient for modern living standards and should be providing car parking provision that meets the real day to day requirements of residents and, in this proposal, commercial occupants. A ratio of one space per bedroom would be more realistic for residential areas and there must be significantly more parking for communal blocks and visitors. On this site, where will excess parking be able to go?

Historical Interpretation Centre (HIC)

As this Parish Council has indicated in a response to a previous application for this site, consideration should be given to storage of historical artefacts currently at the Fort. The funding position in relation to the historical elements of the proposal both in the short term and more particularly in the longer term need to be specified in more detail. It is unclear as to where this funding is expected to come from.

	<p>Access / Transportation Star Hill: Dunton Green Parish Council cannot support an application which has Star Hill as a main exit point. Polhill: It is noted that a roundabout allowing traffic to flow more freely is included within this version of the application, which is a much safer option than the traffic lights previously suggested. However, Dunton Green Parish Council remains concerned about access points to the site.</p> <p>Environmental Impact Vol III Bio Diversity P39 onwards starting at item 5.59) Dunton Green Parish Council remains concerned about the biodiversity of the site and the protection that should be afforded to the site, <i>especially during construction</i>.</p> <p>Appendix 11.1 Fort Halstead Air Quality Assessment Any traffic from Fort Halstead heading towards Sevenoaks is almost certainly going to come through Dunton Green and Riverhead. Not only will this have an impact on the material infrastructure of roads in the area, it will also impact the air quality. Riverhead is already an Air Quality Management area. Whilst the assessment seeks to address air quality near the site, there should be an extension of that assessment to review potential impact on areas already suffering from poor air quality.</p> <p>The Parish Council also fully supports the objections submitted by The Knockholt Society.</p>
<input type="checkbox"/> <p>No Comment/ Comments Only</p>	
<p>FROM:</p>	<p>Dunton Green Parish Council</p>
<p>DATE:</p>	<p>14th April 2021</p>