

FORT HALSTEAD SUSTAINABILITY STATEMENT

Merseyside Pension Fund



Fort Halstead

Hybrid Application

18 September 2019

CONTENTS

- 1 INTRODUCTION 3
 - 1.1 Overview..... 3
 - 1.2 Structure of this Report..... 3
- 2 OVERVIEW OF THE PROPOSED DEVELOPMENT 4
 - 2.1 The Proposed Development 4
- 3 SUSTAINABILITY METHODOLOGY..... 5
 - 3.1 Relevant NATIONAL PLANNING Policy and Guidance 5
 - 3.2 RELEVANT LOCAL PLANNING POLICY AND GUIDANCE..... 5
 - 3.3 Fort Halstead Sustainability statement Methodology 8
- 4 FORT HALSTEAD SUSTAINABILITY FRAMEWORK 9
 - 4.1 Fort Halstead Sustainability Framework..... 9
 - 4.2 Structure of the Framework 10
 - 4.3 Policy Drivers behind the framework..... 10
 - 4.4 Key Performance Indicators that will inform the framework..... 11
 - 4.5 Planning Deliverables..... 11
- 5 SUMMARY 13

Prepared and edited by:	Stephen Kent Senior Consultant For and on behalf of CBRE Ltd. Building Consultancy		
Approved by:	Ruth Geeson Associate Director For and on behalf of CBRE Ltd. Building Consultancy		
Date of Issue: 18/09/2019	Fort Halstead	Status: 3	Issue: Final

1 INTRODUCTION

1.1 OVERVIEW

The purpose of this Sustainability Statement is to set out the overarching sustainability principles to be implemented at Fort Halstead, in order to demonstrate compliance with Sevenoaks District Council policies.

It is proposed that these overarching sustainability principles are conditioned or included within the S106 Obligations as part of the hybrid planning application and built out by subsequent design teams at future reserved matters applications, where greater detailed design information will be available.

1.2 STRUCTURE OF THIS REPORT

The remainder of this report is structured as follows:

- Section 2: Overview of the proposed development;
- Section 3: Sustainability Methodology
- Section 4: Fort Halstead Sustainability Framework
- Section 5: Summary

2 OVERVIEW OF THE PROPOSED DEVELOPMENT

2.1 THE PROPOSED DEVELOPMENT

The hybrid planning permission at Fort Halstead comprising:

In detail:

- Demolition of existing buildings;
- Change of use and works to buildings Q13 and Q14 (including landscaping and public realm);
- Primary and secondary accesses.

In outline:

- Development of business space (use classes B1a/b/c) of up to 27,659 sq m GEA;
- Works within the 'X' enclave relating to energetic testing operations, including fencing, access, car parking;
- Development of up to 750 residential dwellings;
- Development of a mixed-use village centre (use classes A1/A3/A4/A5/B1a/D1/D2);
- Development of a one form entry primary school;
- Change of use of Fort Area and bunkers to Historic Interpretation Centre (use class D1) with workshop space;
- Roads, pedestrian and cycle routes, public transport infrastructure, car parking, utilities infrastructure, drainage;
- Landscaping, landforming and ecological mitigation works.

3 SUSTAINABILITY METHODOLOGY

3.1 RELEVANT NATIONAL PLANNING POLICY AND GUIDANCE

Revised National Planning Policy Framework

In July 2018 the Government published its formal update to the NPPF (2012) with the latest amendments issued in June 2019. In respect of sustainability, the documents retain its focus for the role that the planning system has to play in meeting the challenges presented by climate change. As stated in Paragraph 148:

'The planning system should support the transition to a low carbon future in a changing climate...It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'

At Paragraph 150 it continues to state:

'New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of

*buildings should reflect the Government's policy for national technical standards.'*¹

Deregulation Act 2015

The Deregulation Act introduced in 2015 from the outcome of the Government's housing standards review, sets out the future for England's housing policy. This includes removing the powers Local Planning Authorities (LPAs) have for setting sustainability requirements such as Code for Sustainable Homes and Lifetime Homes standards.

The National Planning Policy Framework policy for allowing the connection of new housing development to low carbon infrastructure such as district heating networks has not been modified as part of this policy.

3.2 RELEVANT LOCAL PLANNING POLICY AND GUIDANCE

Sevenoaks District Council Adopted Core Strategy 2011

The following adopted Sevenoaks District Council policy requirement in relation to energy and sustainability is in place for the Fort Halstead Hybrid Planning Application.

Sevenoaks District Council Core Strategy Policy SP2 – Sustainable Development

¹ Ministry of Housing, Communities and Local Government (2018), National Planning Policy Framework. Crown Copyright 2018: Open Government License 2018

SUSTAINABILITY METHODOLOGY

New homes will be required to achieve at least Level 3 of the Code for Sustainable Homes (CSH), progressing to Level 4 from 2013 and will be encouraged to achieve Level 6 by 2016;

All new commercial (A1-A5, B1-2, B8, C1, D1) and institutional (C2, D1) development will be required to achieve BREEAM 'Very Good' standards increasing to 'Excellent' standards from 2013.

Achievement of the Code levels and BREEAM standards must include at least a 10% reduction in the total carbon emissions through the on-site installation and implementation of decentralised, renewable or low carbon energy sources.

Sevenoaks Proposed Submission Local Plan (December 2018)

As a material consideration the Draft Local Plan December 2018 proposes the following policy requirements in relation to energy and sustainability:

Policy HE1 - Health Wellbeing and Air Quality

To support healthy and safe communities new development should:

- be located within easy access to services and facilities;
- create opportunities for better active travel to promote physical health including provision for safe cycle and pedestrian routes;
- be designed to minimise threats and improve public safety;
- be designed to improve mental health and reduce loneliness and isolation

Policy CC1 - Climate Change, Flooding and Water Management

Climate Change

We will contribute to reducing the causes and effects of climate change by promoting best practice in sustainable design and construction to improve

the energy and water efficiency of all new development. We will support climate change mitigation and adaptation measures, including:

- a. Appropriate small-scale community led renewable energy schemes;
- b. Small scale renewable and low carbon technologies where appropriate;
- c. Reducing the need to travel by sustainably locating new housing and supporting the level of services and facilities;
- d. Promoting sustainable design measures for new developments including passive solar design;
- e. Utilising opportunities for decentralised energy and heating where appropriate; and
- f. Protecting existing green spaces, trees and vegetation to absorb carbon dioxide, provide summer shading, retain and create habitats and reduce surface water runoff
- g. Resilient drainage design which includes a climate change allowance.

All new non-domestic development (including conversions) must achieve BREEAM "Excellent" standards. Applicants will be expected to provide certification evidence of BREEAM score and rating at the design stage and upon completion of development.

Water Management

Development proposals must have regard to the Water Framework Directive, the Thames River Basin Management Plan and management plans for the River Darent and Eden.

New development must not deteriorate any existing watercourses and should actively enhance the natural function and habitats of watercourses wherever feasible. This should include

SUSTAINABILITY METHODOLOGY

- Providing adequate natural buffers to watercourses to prevent damage;
- Reinstating natural buffers where this has been previously lost;
- Seeking opportunities to unculvert watercourses and incorporate them into the water management scheme;
- Restoring damaged waterbodies.

Any necessary crossing points over rivers and watercourses should utilise clear spanning bridges where possible to allow natural river processes and wildlife to continue to utilise the river corridor.

Major development schemes will be expected to undertake a Water Framework Directive Assessment setting out the existing ground and surface water baseline and the potential impact of the new development.

All new schemes should be designed to promote water efficiency and are encouraged to achieve a mains water consumption target of 110 litres per head per day.

Flood Risk

Residential development must avoid, and non-residential development should avoid, areas at risk of flooding and no development should take place in Flood Zones 2 and 3 without agreement from the Environment Agency. Where new development schemes included areas for flooding these should be designed to maximize wildlife and habitat opportunities including in channel habitats.

Development on sites larger than 1ha in Flood Zone 1 must be subject to a Flood Risk Assessment (FRA) in accordance with the Council's Strategic Flood Risk Assessment, National and Local guidance and the Lead Local Flood Authority drainage guidance and policy statements. The FRA should include the requirement for any mitigation measures and where relevant, the assessment should also address the risk of flooding from surface water, groundwater and ordinary watercourses. Where there is evidence that

water from these sources ponds or flows over the proposed site the assessment should state how this will be managed and what the impact on neighbouring sites will be.

Measures identified to mitigate the effects of flooding shall be installed and maintained at the applicants' own expense or put into a management company to ensure their long term retention, maintenance and management. Other flood resilient and/or resistant measures may also be required, and their provision will be informed by the findings of a submitted Flood Risk Assessment.

Sustainable Drainage

All developments must incorporate natural flood alleviation measures and sustainable drainage provision which mimics natural flows and drainage pathways and ensures that surface water run-off is managed as close to its source as possible.

Any drainage scheme must manage all sources of surface water, including exceedance flows and surface flows from off-site, provide for emergency ingress and egress and ensure adequate drainage connectivity. It will not be acceptable for surface water run-off to enter the foul water system.

Sustainable Drainage Systems (SuDS) or other appropriate measures should:

- a. Maintain public safety;
- b. Provide sufficient attenuation to surface water flows as appropriate;
- c. Ensure that there is adequate treatment of surface water flows, such that there is no diminution in quality of any receiving watercourse;
- d. Ensure protection of groundwater; and
- e. Provide or enhance wetland habitat and biodiversity where possible.

SUSTAINABILITY METHODOLOGY

Approval of the design, phasing, long term management and maintenance of SuDS will be required prior to the development commencing. All development should be in accordance with Kent County Council guidance for SuDS.

3.3 FORT HALSTEAD SUSTAINABILITY STATEMENT METHODOLOGY

To respond and show compliance with the relevant planning policies detailed above the methodology for the Fort Halstead Sustainability Statement is to construct a sustainability framework.

The aim of this framework is to confirm that sustainable principles have been established at the outset and to ensure the sustainability requirements can be met throughout subsequent reserved matters applications.

In summary, the structure of the Hybrid Sustainability Statement is as follows:

- Section 4.1 – Sustainability Framework – sets out the vision for the overarching sustainable principles for Fort Halstead.
- Section 4.2 – Structure of the Framework – sets out the structure of the Framework
- Section 4.3 - Policy Drivers – Outlines the policy drivers behind the Framework.
- Section 4.4 – Key Performance Indicators – Provides an overview of the KPIs that inform the framework
- Section 4.5 – Planning deliverables – Outlines the delivery mechanism for Fort Halstead.

4 FORT HALSTEAD SUSTAINABILITY FRAMEWORK

4.1 FORT HALSTEAD SUSTAINABILITY FRAMEWORK

The unique opportunity that Fort Halstead has in relation to sustainability and influencing the character and living conditions of the area is recognised.

To do this Fort Halstead will:



Develop an overarching Fort Halstead Sustainability Framework ('Framework') to manage key environmental social issues cradle to grave.

The framework will be controlled by a collective consisting of the Fort Halstead client team, appointed architect and appointed engineer.

It will act as an influencer, facilitator and collaborator for embedding sustainability principles in all components of the development. The Framework will provide a robust platform to drive innovation and a forward-looking approach to sustainability throughout all reserved matter applications of Fort Halstead.

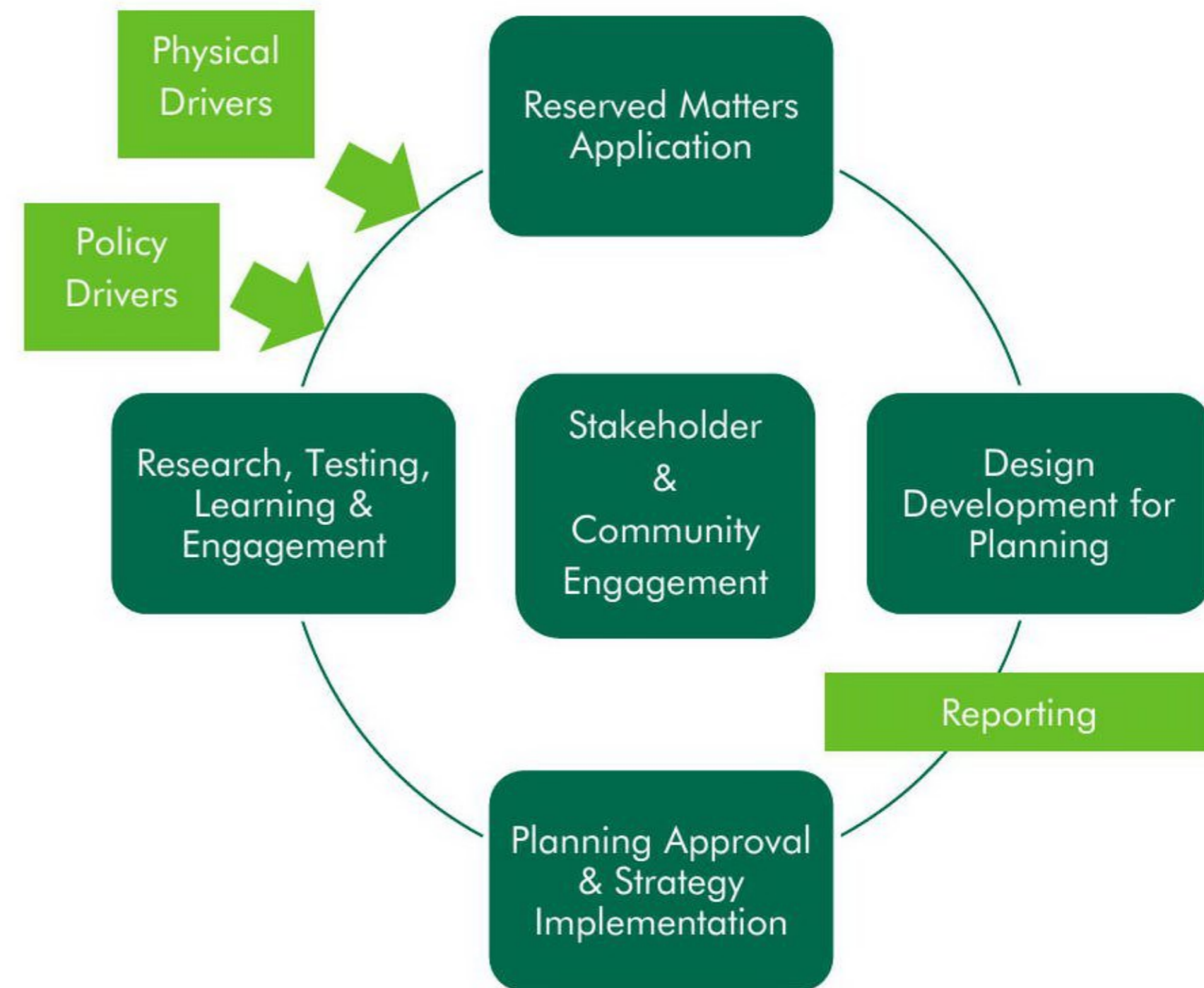
It will also seek to guide the development of specific strategies by setting key objectives within the macro scale (energy, pollution, climate change, water, waste, materials, and transport) as well as micro-scale Key Performance Indicators (KPIs) reflected in national and local authority planning policy, BREEAM and other design parameters.

As well as guiding the development and build out of the phases of the development, with each phase responding to the Framework through the submission of reports as part of the reserved matters applications.

The Framework will also include the following fundamental mechanisms:

- A continual review of sustainability drivers to ensure these remain relevant for the scheme and are being achieved.
- Planning / Reserved Matters application reporting to track progress and identify where additional focus may be needed

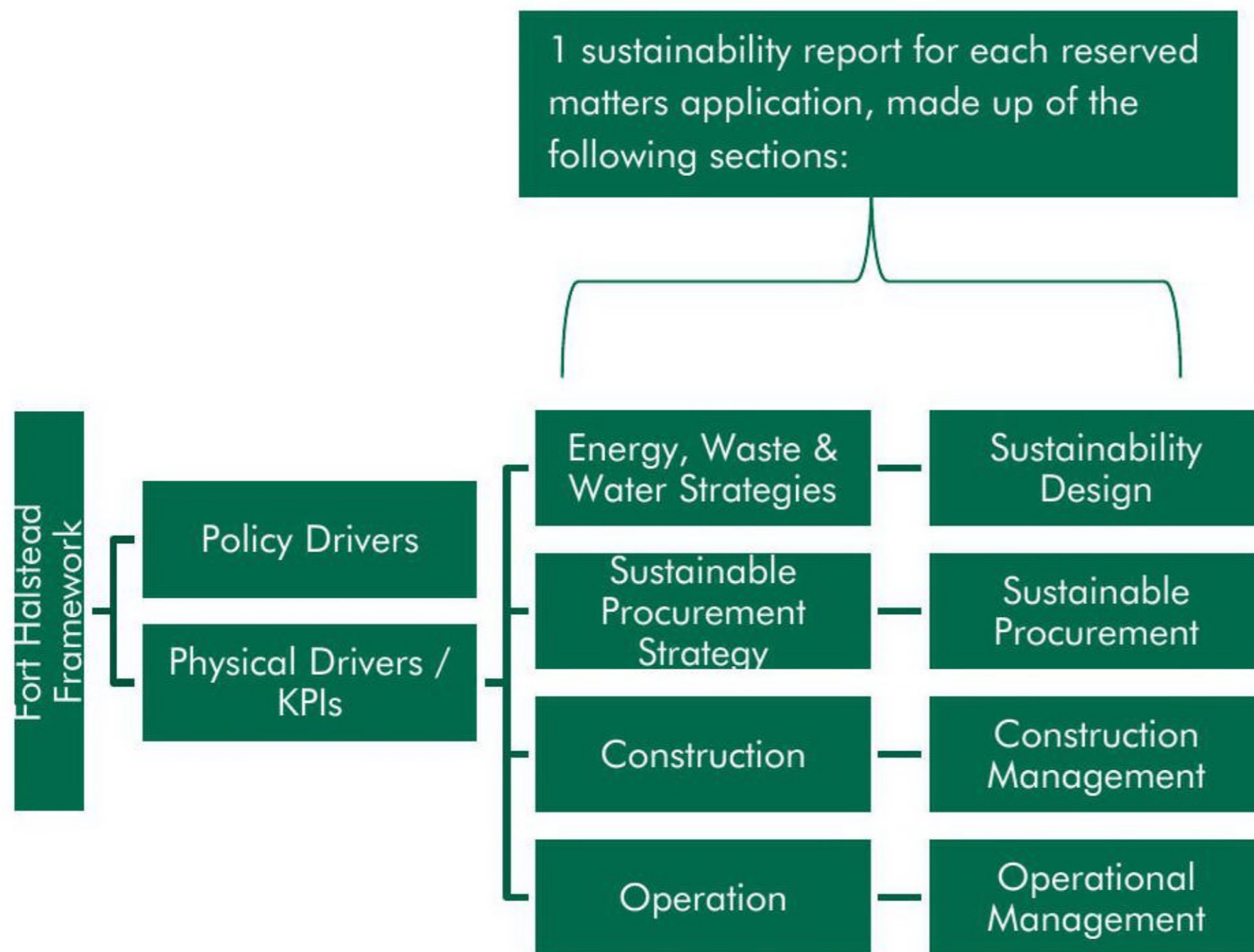
By setting this continuous improvement cycle will enable Fort Halstead respond to the latest challenges of sustainable development and living.



FORT HALSTEAD SUSTAINABILITY FRAMEWORK

4.2 STRUCTURE OF THE FRAMEWORK

The Framework will be made up of the following components to ensure a robust delivery of sustainability:



4.3 POLICY DRIVERS BEHIND THE FRAMEWORK



The Framework will be shaped by European, national, and local policy to ensure that they respond to the key drivers within policy.

A wide range of legislative and policy requirements will shape the Framework. These are summarised below:

Fort Halstead Framework		
European legislation e.g Energy Performance of Buildings Directive	National legislation and standards e.g Building Regulations and Climate Change Act	Sevenoaks District Council policies e.g Core Strategy 2011, ADMP 2015 and Draft Local Plan 2018

The Framework will set out the commitments and proposed approaches to meeting the objectives set out in policy and by committing to these actions, the client agrees to finance and deliver Fort Halstead in line with the policy drivers.

A continual review of the policy drivers will be completed at each reserved matters stage to ensure the Framework reflects changes in policy.

FORT HALSTEAD SUSTAINABILITY FRAMEWORK

4.4 KEY PERFORMANCE INDICATORS THAT WILL INFORM THE FRAMEWORK

The Framework will consist of Key Performance Indicators (KPIs) for the design, construction, operational and maintenance phases of development to ensure sustainability is considered at the earliest possible stages and maximise the development's benefit to sustainability. The KPIs will comprise design processes covering key themes including:

- Energy
- Health and Wellbeing
- Sustainable Construction and Procurement Strategies
- Operational Management Strategies
- Water
- Waste

To ensure full transparency and accountability, and as a means of applying the Framework to specific stages of Fort Halstead, sustainability reports will be submitted alongside the reserved matters application for each phase. These reports will detail how each phase is responding to the the policy drivers and KPIs included in the framework.

4.5 PLANNING DELIVERABLES

In summary, for Fort Halstead, it is proposed that the following are conditioned or included within the S106 obligations as part of the hybrid planning approval so that subsequent detailed design of build out phases and their accompanying reserved matters applications ensure concurrent development with regard to the sustainability aspirations of the scheme:

- the Framework including the KPIs.

Each reserved matters application would be accompanied by a detailed sustainability report, setting out how the design of that phase has met the KPI requirements, local planning policy and also responded to wider changing sustainability standards.

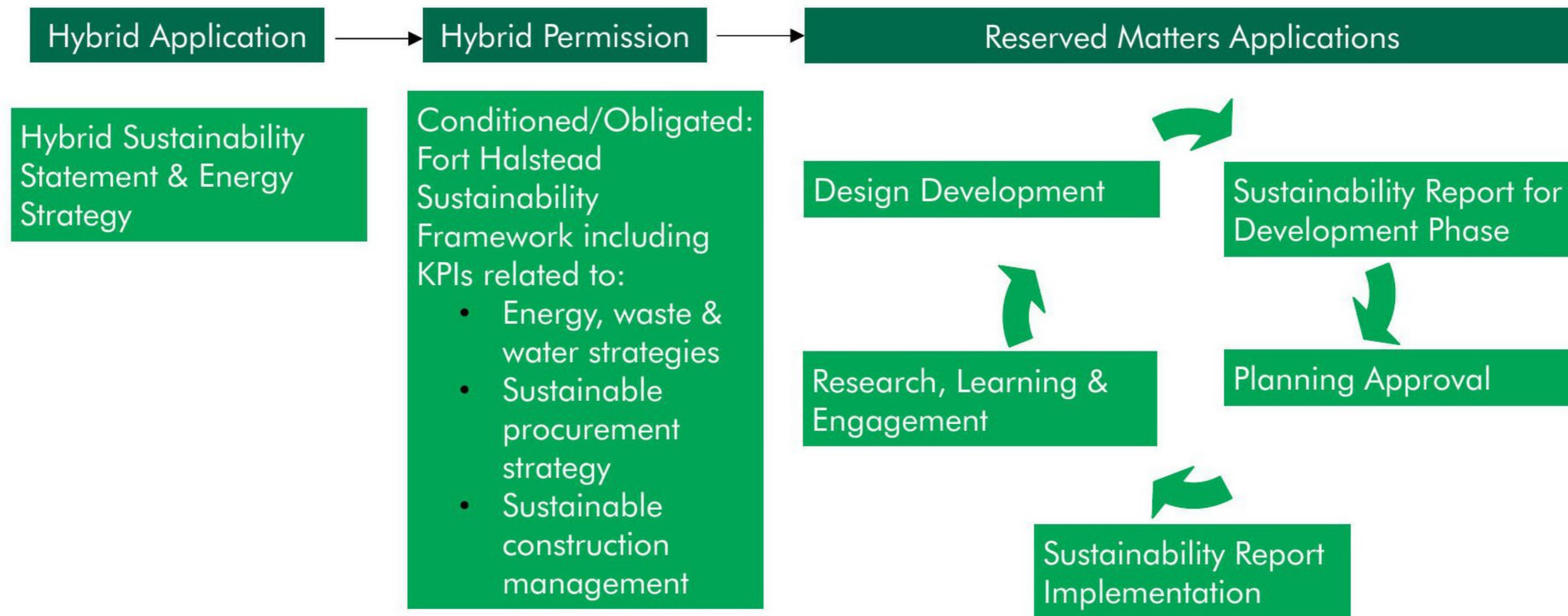
The Framework allows for flexibility. The Framework sets out the overarching principles, which comply with local planning authority policies and best practice. Whilst at the same time, it allows future design teams to amend and build out these principles in line with future sustainability and energy design principles, ensuring that Fort Halstead remains at the forefront of sustainable design.

The planning delivery mechanism for the Fort Halstead Hybrid Sustainability Statement is summarised overleaf.

For full details the KPIs that are to be included within the Framework, please refer to Appendix 1 – Fort Halstead Framework KPIs.

FORT HALSTEAD SUSTAINABILITY FRAMEWORK

Figure 1. Fort Halstead Sustainability Framework



5 SUMMARY

In summary, the Hybrid Sustainability Statement for Fort Halstead, confirms compliance with the relevant local authority planning policies and demonstrates that sustainable governance, practices and processes are at the heart of the design proposals for Fort Halstead.