SEVENOAKS DISTRICT COUNCIL

PARISH COUNCIL PLANNING APPLICATION CONSULTATION RESPONSE

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| Reference | 19/05000/HYB |
| Site : | DSTL Fort Halstead Crow Drive Halstead Sevenoaks KENT TN14 7BU |
| Proposal: | 19/05000/HYB | Hybrid application comprising, 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); 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. | |
| Support: |  |
| Objection  and Reasons: | Halstead Parish Council strongly object to this application.  Halstead Parish Council have strong objections to the size and location of this development, which is substantially larger than the previously approved application for 450 houses on the same site. We also have a concern for the safety of those who may choose to work or live on the site due to contamination. The impact of this development on neighbouring villages, the environment and potentially those living on the site are serious and significant. This HYBRID application seeks to create a new village within the bounds of several Parishes, most noticeably that of Halstead. At present there are only 60 houses on the outside of the FH perimeter fence and no residential buildings inside the fence. To create 750 new homes plus commercial units will put Halstead into a much higher position in the hierarchy tier which is totally against both SDC and NPPF aims. There are several reasons why this HYBRID application should not be agreed.  Overdevelopment  Government housing need is not a target and the additional application for another 300 houses must be agreed, or not, on factors other than developers profits. “*We have made it clear that a housing need figure is not a target…………………planning to meet that need should be based on relevant constraints such as Green Belt and AONB*.” Kit Malthouse MP Minister of State for Housing 17/10/18.  It is the duty of authorities to cooperate with neighbouring authorities which SDC have to do. HPC have been closely in touch with neighbouring Parishes and find it unacceptable that our north-west Parishes should take more than 10% of the SDC housing target.  Green Belt and Areas of Outstanding Natural Beauty.  The entire Fort Halstead site lies within the Green Belt and an Area of Outstanding Natural Beauty; a fact that seems to have been overlooked within the application. There is no evidence to suggest why the Green Belt boundaries should be altered, no exceptional circumstances have been fully evidenced and justified (Para. 136 of the NPPF) and therefore this site should receive protection through the policies laid down in NPPF and also the Sevenoaks Core Strategy and Green Belt Supplementary Planning document?  The NPPF Paragraph 145 d) and the Policy GB9 of the Sevenoaks District Council Green Belt SPD show that ‘the replacement of a building (…is not appropriate in the Green Belt…) provided the new building is in the same use and not materially larger than the ones it replaces.  Paragraph 145 of the NPPF states that partial or complete re-development of previously developed land would be considered appropriate development in the Green Belt so long as it does not have a great impact on the openness of the Green Belt than the existing development. Halstead Parish Council acknowledge that this site has the potential to be developed, considering its current use and built form but this application should be done in a manner that enhances the area on a scale that is appropriate and without inflicting harm on the villages and country side that surrounds it.  Despite its industrial use, the current site is a tucked away secret which causes little problems to the surrounding villages. The development of 750 houses will have a significant impact on the openness of the Green Belt in numerous aspects including the removal of trees, redevelopment of traffic systems, the increase in people, noise and disturbance of wildlife.  Halstead Parish Council agree with the Kent Downs AONB who state this is a “unique opportunity to create an exemplary development in and internationally protected landscape”. Redevelopment should be “landscape” led, not commercial and residential. NPPF Paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty which have the highest status of protection.  The site is also surrounded by Ancient Woodland. Paragraph 175 c) states that development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland should be refused.  The change from an employment-led application.  The previously approved application for this site was for an employment-led mixed-use development of 450 houses, a hotel and 27,000 m2 of employment floorspace. The current application seeks to remove that hotel in exchange for more houses changing that employment-led aspect to a residential-ked development. Policy LO8 of the core strategy states that development that supports the maintenance and diversification of the rural economy and the vitality of local communities will be supported so long as it is compatible with policies for protecting the Green Belt and the Kent Downs AONB. Considering what employment opportunities are being lost, plus the loss of the already approved employment-led application from 2015 we do not feel that this application meets the criteria laid down in this policy.  Contamination  We must voice our concerns regarding contamination on the site. We have read the various reports regarding remediation of the site and take exception with the Planning Statement which states that “The site has been previously used in a manner similar to general industrial sites” We wonder how many other industrial sites across the county have been identified as he headquarters from the ‘High Explosives Research” team that was responsible for developing Britain’s first atomic bomb?.  We have read the reports produced for the various developers over the years, namely the Waterman report produced for Armstrong Kent LLP and the more recent Hydrock reports into ground conditions and contamination and details from these reports. We understand they make light of contamination but we cannot dismiss the concerns of our local parishioners who have worked at the Fort and lived in the surrounding areas for many many years. There are reports of how deep the contamination goes, how pink water was never disposed of in the correct manner, how for periods of time the cancer rate in the village did seem to soar beyond what was regular. We have seen reports from engineers which suggest the MOD do not have the correct capabilities to clean up their own contamination and that there are other sites where the clean-up operations carried out by the MOD have not been adequate.   We also note that the area surrounding the ancient monument plus under the existing buildings have not been investigated. We believe these areas to be some of the most contaminated around the site. Can SDC be sure that approval of this application, without investigations into these areas, will not put the lives of those who live and work within the vicinity in jeopardy? Let along the health of the hundreds of families who will live on the site going forward.  We see from responses that we are not the only interested party with such concerns. We direct the planning officers to the response from the Environment agency which wishes to impose numerous conditions onto the planning application.  This council would like to see an independent unbiased report commissioned for this site to show what levels of contamination, in the ground and the water, the developers will be dealing with and a response from the developers as to how they will deal with any findings.  Transport Infrastructure   1. Cars   We live in a car dominated society particularly in Sevenoaks where the ownership of cars is higher than nearly anywhere else in the UK. Statistics from ONS suggest that in Halstead there are only 46 households without a car or van. More than 50% of households have 2 or more cars or vans. Due to the lack of adequate public transport it is unlikely that existing residents or new residents will abandon their cars. This is likely true of a new development too. Without a significant improvement of public transport options, residents of the countryside will rely on their cars to carry out their day to day business.  If we are prudent, we feel that it would not be an exaggeration to assume that an extra 750 houses would generate an extra 1200 cars onto an already bursting road network. Highways England have voiced concern over the Strategic Road Network and the increased pressure onto junction 4, M25 spur to Hewitt’s roundabout with the A21 and A224. Local knowledge appreciates how congested these areas are, particularly at commuting times.  This application has also been prepared out of context with new developments in the area, possibly a 850+ dwelling development at Broke Hill plus all other developments including 20 new homes at Highland Farm/Knocka villa, 66 at Polhill Business Centre, 37 at Oak Tree Farm, 27 at the roundabout, and 100 at Chelsfield depot where the traffic movements will filter onto the same section of road.   1. Trains Knockholt Station is quoted as a “National Rail Hub” There are trains to London and to Sevenoaks, Tunbridge Wells and beyond, but the timetable is very limited. The station is only manned from 7am to 9.30am and is accessed by only 1 pedestrian entrance. There is a footbridge to the southbound side but no lift making it impossible for anyone with mobility issues – wheelchair or mobility scooter – to either travel down from London or travel south to Sevenoaks as they cannot reach the exit on the north side. There are no facilities such as toilets, café, enclosed waiting area after commuting time in the morning.   A study by network rail into train routes in Kent shows that mainline trains are already ‘congested standing from Chelsfield inwards, but the study shows that no significant improvement is planned between now and 2044. This same study also says that there is no capacity of the Tonbridge to Orpington line for an extra train path and no capacity at Charing Cross or Cannon Street to turn it around.   1. Road layout concerns  Star hill is not a sustainable access point. Local knowledge allows us to understand the difficulties of navigating this steep hill on an average day, let alone one with adverse weather. This route is a beautiful rural route and opening of this end of the Fort will inevitably mean that the villages of Halstead and Knockholt end up as rat runs for commuters travelling to and from London plus as an unofficial diversion for M25 traffic when there are issues between J4 and J5.   The creation of a roundabout onto Polhill will increase traffic congestion and contribute to harmful pollution having a direct effect on the AONB, Ancient Woodland and Green Belt. We also have concerns regarding the stability of Polhill. We see that landslides have been highlighted within the Ground Conditions report and feel that such an increase in traffic will contribute to the further landslides . We have already lost one lane of traffic going down Polhill, losing another would only compound the traffic jam issues.  Water  This council have always been concerned about the water availability at the Fort. Our residents who live there presently are constantly being cut off from their fresh water supply and being provided with bottled water for days on end. In 2018 they were left for 33 weeks without water due to a contamination issue. Thames Water highlight that the current network would not support the development and the Environment Agency have concerns with the quality of water. This council would like to ensure that before ANY development go ahead, the basic human right of access to water is addressed and a plan put in place before development begins.  Housing density and built form.  Proposed density of the site has increased with the extra 300 houses from the 2015 application from 34dph to 46 dph. Despite the application playing the numbers to make those densities seem lower, the highest density areas are 50-60dph. The current density of development in Halstead sits around 18dph. The proposed level of development represents “urban” development not the lower and more varied density that are the defining characteristics of the Kent Downs villages.  We do not believe that any of the current buildings on the site go beyond a height of 3 storey, therefore we believe that none of the development should reach the proposed heights of 4 storeys. We feel that this would be inappropriate development within the green belt and go against the recommendations made in the Green Belt SPD Chapter 7.3 which expects redevelopment proposals to not exceed the height of existing buildings.  Primary School Having just submitted an objection to another local development which also proposes a primary school, it is very difficult to make comment on whether or not this primary school would be of benefit to the community. The issue with looking at these large-scale developments as standalone applications. What happens if both are approved? Does one primary school just become more houses? We know there have been broken promises in other local developments, why should we trust that it won’t be the same case here.  To conclude: this application has serious failings and HPC would like reassurance that before a decision is made a thorough independent assessment of the contamination is made, that a realistic financed proposal about the water supply is made and that a costed traffic assessment is made regarding roads/roundabouts etc. SDC also need to confer with HPC and other neighbouring Parish Councils about the future management of this development. |
| No objection:  No comment: |  |
| Further Comments: |  |
| From | Louise Dancy on behalf of Halstead Parish Council |
| Date | 18 November 2019 |