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Sunday, 27th October 2019

Planning Department
Sevenoaks District Council
Argyle Road
Sevenoaks, Kent
TN13 1HG

Subject: **Revised planning application for Fort Halstead, 750 houses**

Your Reference: **19/05000/HYB**

Sent by email—27 October 2019—to planning.comments@sevenoaks.gov.uk

Dear Sir/Madam

Firstly, the Society feels that the area north of the M25 in the (now to be withdrawn?) Local Plan is being targeted with a disproportionate number of residential developments—no fewer than NINE sites in our little area, entailing destruction of significant areas of the Green Belt. They are mainly strung out to flank the A224 in the Polhill area, including the proposed major development at Fort Halstead. The cumulative impact on the area will needlessly contribute to urban sprawl and severely impact rural communities to their detriment.

Turning specifically to Fort Halstead, while the Society supports the use of PDL, or brownfield land, to protect the Green Belt, expansion of the proposed development from 450 to 750 properties—alongside the 62 existing residential properties—will dwarf surrounding village communities, which typically do not exceed 500 residences.

Over half of these proposed houses have a density of 45 to 60 dwellings per hectare (dph), while roughly a quarter are at 50 to 60dph. Many are planned to be three storeys high. How on earth does this cramming of properties fit in with a rural area?

The area has hardly any public transport left. Recently, one of only two bus services via Knockholt was axed. As for trains, Knockholt station is 2.5 miles from the village and has very limited parking capacity. We are an aging population living in Kent's highest village—cycling for most people is out of the question. Additionally, Sevenoaks Rail Travellers Association has advised that services are already configured for a maximum of 10 coaches while the Kent Route Study shows there is no capacity for any extra trains on the congested local lines into London. Put simply, it's standing room only now and rail can't cope with a potential 750 or more new commuters.

With poor transport links, residents today are forced to rely heavily on cars. If 750 houses are added at Fort Halstead, that will likely see at least 1,500 more cars spilling onto our narrow, rural lanes.

A major issue for Knockholt and Halstead residents throughout the long, long saga (*see below*) of planned developments at Ford Halstead has been the exit onto Star Hill Road, which is currently restricted for DSTL security reasons. Both villages already have issues—main roads through Knockholt and Halstead are used as rat-runs and speeds of 60mph on our 30mph-limited roads have been recorded. Should the entry/exit onto Star Hill Road be allowed for general use, despite Sevenoaks District Council's (SDC) pledge not to do so, the traffic impact would be devastating.

It is imperative that the Star Hill Road access remains restricted—emergency services vehicles and buses only.

As for Star Hill itself, it's very steep, narrow, has no pedestrian pavements, has a series of hairpin bends with no visibility, and over weekends is heavily used by cyclists and cycle clubs as part of the Seven Hills challenge. It has been the scene of several major accidents, including a fatality. Should the existing (though as said, currently restricted) exit from Ford Halstead onto Star Hill become available for general use, congestion and the accident risk will rise hugely.

That leads me to the general state of our roads. Kent County Council has a very poor record in maintaining them: most in the villages have had little or no proper resurfacing for over 30 years and are a patchwork quilt of bumpy pothole repairs. Fort Halstead's main exit, onto Polhill Road, is itself a major example of the lack of maintenance: structural issues with the carriageway over the years have not been addressed with the result that the downhill carriageway width has been cut in half.

Turning to local services, shops, schools, medical facilities, and the under-developed infrastructure, all will be overwhelmed by this small town-sized development.

SDC's original excuse in its U-turn (*see below*) on approving 450 houses in 2015 was that the scheme would be 'Employment Led.' The original approved plan, for example, included a hotel. That's now vanished. All that's left is a small industrial area with no guarantee of any significant take-up. Another 300 houses? That really does stand 'Employment Led' on its head!

The Society also points out that this is a Green Belt site with large swathes of ancient woodland and grazing land. There's also a question mark over contamination at certain areas used by Ministry of Defence organisations.

What price the environment?

Certainly, the Fort Halstead developers seemed to acknowledge its value in their original application, stating that their development would: 'Help protect other less-developed areas of the Green Belt from potential release'. In this context, one has to reflect on the planning application recently submitted by Quinn Estates for about 1,000 houses on the former Broke Hill Golf Course, which is virtually adjacent to Fort Halstead. Broke Hill is both Green Belt land and an area of outstanding natural beauty...

Finally, I mentioned this has been something of a saga, dating back many years with plans at one stage looking to build over 1,000 houses at Fort Halstead. The Society and many other organisations fought it to a standstill ... or so we thought.

Fort Halstead was addressed by Sevenoaks District Council in its 2010 Core Strategy, and in a SDC public statement in January 2011 that said: "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 idea.

"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.

"In practice," SDC stated, "this means that large-scale housing development at the site is unlikely to be granted planning permission."

Since then, nothing has really changed in terms of it being 'a sustainable location'. It's only assorted governments' various targets for housing that have seen the Green Belt increasingly under threat. As a reminder, the Government National Planning Policy Framework regarding the Green Belt states:

- It should check against unrestricted sprawl of large built-up areas
- Prevent neighbouring areas merging into one another
- Safeguard the countryside from encroachment.

The Society feels there are absolutely no 'exceptional circumstances' that should allow Fort Halstead to breach those aims. With the collapse of the current 'Employment-Led' excuse to despoil the Green Belt, the Society asks SDC to reject the application.

Yours sincerely,

