

1 INTRODUCTION

1.1 INTRODUCTION

This Environmental Statement (ES) has been prepared to accompany a full planning application to Sevenoaks District Council (SDC) submitted by Merseyside Pension Fund (from herein referred to as 'the Applicant'), for a proposed mixed-use development on a site at Fort Halstead, Crow Drive, Halstead (National Grid Reference TQ 49741 59317) (the 'application site').

Scheme Background and Context

The Fort Halstead site was granted outline planning in 2015 by Sevenoaks District Council (SDC) for the following:

"Outline planning permission for the demolition of buildings and development of a mixed-use development comprising a business area (Use Classes B1 and B2 with ancillary energetic material testing) of up to 27,000 sq m GEA, 450 residential units, a hotel of up to 80 beds, a village centre (Use Classes A1-A3, B1a, D1 and D2), use of the Fort Area and bunkers as an historic interpretation centre (Use Class D1) with ancillary workshop space, and works associated with the development including roads, landscaping, security fencing, formal and informal open space, pedestrian, cyclist and public transport infrastructure, utilities infrastructure, sustainable urban drainage system, cycle and car parking (with all matters reserved); and detailed approval for two access points at Offord Lane/Crow Drive (primary) and Star Hill (secondary)." (Ref: SE/15/00628/OUT).

The application site is centred on National Grid Reference (NGR) TQ 49741 59317. It is bounded by Star Hill Road to the west, Fort Road and Armstrong Close to the north, and land within the Applicant's ownership adjoins the remainder of the application site boundary, comprising mainly woodland and grassland. The application site is shown in Figure 1.1 at the rear of this chapter.

The application site is currently occupied in large part by the Defence Science and Technology Laboratory (DSTL) and in part by QinetiQ, a specialist defence company, which provides scientific and technical research services to the Ministry of Defence (MoD). Due to the current consolidation and relocation of DSTL, the majority of the application site will be vacant thereafter and available for redevelopment.

Approximately 280 buildings are present on the site, some of which are vacant, with the main part (excluding the Fort Scheduled Monument) identified in SDC's Core Strategy [1] as a Major Developed Site (MDS) for employment. The Existing Site Plan Drawing provided in Figure 1.2 at the rear of this chapter shows the buildings on the application site and assigns a key reference number to each of those buildings. This ES uses these reference numbers when referring to relevant buildings. The MDS coincides with the extent of the built environment and employment-related development on the application site, which covers an area of approximately 40.1ha. The boundary of the MDS, is defined in the Allocations and Development Management Plan [2] pursuant to the Core Strategy.

There are circa 38 buildings that are considered heritage assets of varying sensitivity across the application site, these include one Scheduled

Monument (the Fort) that includes eight separate structures and four listed buildings (two of which are listed Grade II and the other two at Grade II*).

Topographically, the application site and the wider surrounding area is dominated by a chalk escarpment that extends in a southwest/northeast direction. The application site is located on the top of the chalk escarpment ridge and is elevated above the surrounding area. Much of the site is relatively flat, with ground elevations ranging from approximately 160m Above Ordnance Datum (AOD) in the north-eastern part of the site to 220m towards the western part of the site resulting in some gradual level changes across a large area. However, the southern part of the site slopes steeply from 210m to 180m.

The application site is located within the Kent Downs Area of Outstanding Natural Beauty (AONB) and the Green Belt. The Kent Downs AONB is noted for its distinctive chalk downland, steep scarps and woodlands. Ancient Woodland, as defined by Natural England and Kent Biological Records Centre data, is present in the north-west and western part of the application site. In addition, the trees on the application site are subject to Tree Preservation Orders.

A hybrid planning permission is being sought for a 'Mixed-use development comprising a business area (Use Classes B1 and ancillary B8) of up to 3.7ha, retention of QinetiQ (Use Classes B1 and ancillary B8), up to 750 residential units, a village centre (Use Classes A1-A3, B1a, C3, D1 and D2), use of the Fort area and bunkers as an historic interpretation centre (Use Class D1) with ancillary workshop space, and works associated with the development.'

The Applicant is submitting a hybrid application with all matters submitted in outline save for full details provided in relation to:

- The refurbishment and development associated with buildings Q13 and Q14 within the village centre; and
- Access.

QinetiQ intends to remain on the application site subject to the improvement of its premises as part of the redevelopment and will be located predominantly within the 'X' enclave (as per the existing site nomenclature).

Planning Documentation

This Environmental Statement (ES) is one of a number of documents that have been submitted alongside the planning application. All of the documents that have been submitted are listed in **Table 1.1**.

Table 1.1
Documents Submitted Alongside the Planning Application

HYBRID PLANNING APPLICATION SUBMISSION DOCUMENTS
DOCUMENTS FOR APPROVAL
Application Form
Site Location Plan and Existing Site Plan
Outline Parameter Plans:

HYBRID PLANNING APPLICATION SUBMISSION DOCUMENTS

- Land Use and Green Infrastructure Plan
- Building Heights Plan
- Access and Movement Plan
- Demolition Plan

Detailed Plans:

- Village Centre (Q13-Q14) Proposed Demolition
- Village Centre (Q13-Q14) Proposal in Context
- Village Centre (Q13-Q14) Proposed Ground Floor in Context
- Village Centre (Q13-Q14) Existing Ground Floor Plan
- Village Centre (Q13-Q14) Existing First Floor Plan
- Village Centre (Q13-Q14) Existing Roof Plan
- Village Centre (Q13-Q14) Existing Elevations
- Village Centre (Q13-Q14) Proposed Primary Demolition
- Village Centre (Q13-Q14) Proposed Ground Floor Plan
- Village Centre (Q13-Q14) Proposed First Floor Plan
- Village Centre (Q13-Q14) Proposed Roof Plan
- Village Centre (Q13-Q14) Proposed Elevations
- Village Centre (Q13-Q14) Proposed Sections
- Village Centre (Q13-Q14) Street Elevations
- Village Centre (Q13-Q14) Bin and Cycle Store
- Star Hill and Pole Hill Access Plans

Detailed: Village Centre Document

SUPPORTING DOCUMENTS

- Outline Illustrative Masterplan
- Outline Indicative Density Plan
- Design and Access Statement
- Design Principles Document
- Planning Statement (inc S106 Heads of Terms)
- AONB Report
- Viability Statement
- Statement of Community Involvement
- Sustainability Statement
- Energy Statement

Environmental Impact Assessment

Environmental Impact Assessment (EIA) is a systematic process for ensuring that the likely significant effects of a new development on its surrounding environment are fully identified and taken into account before that development is allowed to proceed. The aim of the EIA process is to provide the relevant decision maker (the 'competent or lead authority') with the information necessary to consider potential environmental impacts, to ascertain whether these are acceptable, and, to secure measures to mitigate any impacts likely to result in significant effects, or remove them completely, prior to granting relevant consents/permissions.

INTRODUCTION

The purpose of Environmental Impact Assessment (EIA) is:

“to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process” [3].

Applicable EIA Regulations

The procedures for undertaking EIA for a development within the terrestrial environment are set out within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) [4] (herein ‘EIA Regulations 2017’). The EIA Regulations 2017 implement the requirements of EU Directive 2014/52/EU [5] which is an amendment of EU Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment [6].

This ES is submitted in accordance with the EIA Regulations 2017.

Under the EIA Regulations 2017, the proposed development is not Schedule 1 development, for which EIA would be mandatory. However, it is of a type listed within the descriptions of development contained within Schedule 2, falling under category 10(b) urban development projects (including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas). A development is considered to be Schedule 2 development if any part of it lies within a ‘sensitive area’ or if it meets or exceeds the relevant thresholds and criteria for that category of development. The thresholds and criteria for category 10(b) projects are 1 hectare (ha) for non-dwelling house development, development which includes more than 150 dwellings and where the total application site is greater than 5ha.

The proposed development does lie within a sensitive area as defined in the EIA Regulations 2017: the Kent Downs AONB. In addition, the development would exceed all the category 10(b) thresholds as it comprises: more than 1 hectare of ‘non-dwelling-house’ urban development; more than 150 dwellings; and, an overall site area greater than 5 hectares. As such, the proposals are considered Schedule 2 development and would fall within the scope of the EIA Regulations.

Schedule 2 developments are only ‘EIA development’ where they have the potential to give rise to likely significant effects on the environment by factors such as their nature, size and location.

In the interests of undertaking a robust assessment of the likely environmental effects of the proposals, the Applicant is voluntarily submitting an ES to accompany the full planning application to the local planning authority, SDC. No request for a screening opinion was submitted to SDC.

The ES

The product of the EIA process is an ES. Regulation 2(1) of the EIA Regulations 2017 states that an ES has the meaning given by Regulation 18(3) which defines it as a statement that at least includes:

- a. a description of the proposed development comprising information on the site, design, size and other relevant features of the development;
- b. a description of the likely significant effects of the proposed development on the environment;
- c. a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- d. a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;
- e. a non-technical summary of the information referred to in sub-paragraphs (a) to (d); and
- f. any additional information specified in Schedule 4 of the EIA Regulations 2017 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.

Structure of the Environmental Statement

This ES comprises the following:

- **Volume I: Non-Technical Summary (NTS)**, which provides a concise, accessible overview of the proposed development and the findings of the EIA for a wide and non-technical audience.
- **Volume II: Main Volume** of the ES, which describes the proposals, the alternative options considered, the baseline environmental conditions, the likely significant effects of the proposed development alone and in combination with the cumulative schemes, the proposed mitigation measures and the residual environmental effects.
- **Volume III: Technical Appendices** containing technical reports that have informed the assessments contained in Volume II, as well as, where relevant, reports that deal with topics that have been ‘scoped out’ of the ES.

The specified information in Schedule 4 of the EIA Regulation 2017 is replicated in **Table 1.2**, which also indicates where this information has been provided within this ES.

Table 1.2

Specified Information within Schedule 4

SPECIFIED INFORMATION	WHERE PROVIDED
1. Description of development, including in particular:	
a. a description of the location of the development;	Vol II, Ch 3

SPECIFIED INFORMATION	WHERE PROVIDED
b. a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;	Vol II, Ch 3 & 5
c. a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;	Vol II, Ch 6 – 14; Vol III
d. an estimate, by type and quantity, of expected residues and emissions such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.	Vol II, Ch 6 – 14; Vol III
2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	Vol II, Ch 4
3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	Vol II, Ch 6 – 14; Vol III
4. A description of the factors specified in Regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.	Vol II, Ch 6 – 14; Vol III
5. A description of the likely significant effects of the development on the environment resulting from, inter alia:	

INTRODUCTION

SPECIFIED INFORMATION	WHERE PROVIDED
a. the construction and existence of the development, including, where relevant, demolition works;	Vol II, Ch 6 – 14; Vol III
b. the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;	Vol II, Ch 6 – 14; Vol III
c. the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;	Vol II, Ch 6 – 14; Vol III
d. the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);	Vol II, Ch 6 – 14; Vol III
e. the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;	Vol II, Ch 6 – 14; Vol III
f. the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;	Vol II, Ch 6 – 14; Vol III
g. the technologies and the substances used.	Vol II, Ch 6 – 14; Vol III
The description of the likely significant effects on the factors specified in Regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the relevant environmental protection objectives established at the national level.	Vol II, Ch 6 – 14; Vol III
6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	Vol II, Ch 6 – 14; Vol III

SPECIFIED INFORMATION	WHERE PROVIDED
7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	Vol II, Ch 6 – 15; Vol III
8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	Vol II, Ch 6 – 14; Vol III
9. A non-technical summary of the information provided under paragraphs 1 to 8.	Vol I
10. A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	Vol II, Ch 1 – 17

Source: EIA Regulations 2017

1.2 THE CONSULTANT TEAM

This ES has been written predominantly by CBRE Ltd.’s Environmental Planning and Assessment team (‘CBRE EP&A’) with specific inputs from sub-consultants on the technical chapters. It has been prepared based on information provided by the Applicant, the architect, landscape architect, the technical consultants, and the planning consultant.

In accordance with Regulation 18(5)(A) of the EIA Regulations 2017, this ES has been prepared by competent experts. CVs are provided for all chapter authors within ES Volume III to illustrate the relevant expertise and qualifications of the team, in accordance with Regulation 18(5)(B) of the EIA Regulations 2017.

The members of the Applicant’s consultant team are listed in **Table 1.3** and authors of the ES chapters and technical appendices are listed in **Table 1.4**.

Table 1.3

Consultant Team

ROLE	COMPANY
Applicant	Merseyside Pension Fund
Client Representative	CBRE Capital Advisors
EIA Project Manager	CBRE EP&A
Planning Consultant	CBRE Planning
Architect	JTP
Landscape Architect	LDA Design
Services Engineer	CBRE Engineering Services
Cost Consultant	CBRE Project and Cost Management
Principle Designer	CBRE Project and Cost Management
Transport Consultant	PBA
Air Quality Consultant	Waterman
Noise and Vibration Consultant	Hydrock
Ecology Consultant	Middlemarch Environmental Ltd.
Landscape & Visual Consultant	LDA Design
Historic Environment Consultant	RPS/Waterman
Flood Risk & Drainage Consultant	Hydrock
Ground Conditions Consultant	Hydrock
Socio-Economic Consultant	Hatch Regneris

Table 1.4

ES Chapter and Technical Assessment Authors

CHAPTER/ APPENDIX	TITLE	AUTHOR
Volume I	Non-Technical Summary	CBRE EP&A
Volume II	Main ES Volume	
Chapter 1	Introduction	CBRE EP&A
Chapter 2	EIA Methodology	CBRE EP&A
Chapter 3	Application Site & Proposed Development	CBRE EP&A
Chapter 4	Alternatives & Design Evolution	CBRE EP&A
Chapter 5	Construction Strategy	CBRE EP&A
Chapter 6	Socio-Economics	Hatch Regeneris
Chapter 7	Landscape & Visual	LDA Design
Chapter 8	Historic Environment	RPS/Waterman
Chapter 9	Biodiversity	Middlemarch Environmental Ltd.
Chapter 10	Transportation	PBA

INTRODUCTION

CHAPTER/ APPENDIX	TITLE	AUTHOR
Chapter 11	Air Quality	Waterman
Chapter 12	Noise & Vibration	Hydrock
Chapter 13	Ground Conitions & Contamination	Hydrock
Chapter 14	Water Resources & Flood Risk	Hydrock/CBRE
Chapter 15	Cumulative Effects	CBRE EP&A
Chapter 16	Summary of Mitigation and Residual Effects	CBRE EP&A
Chapter 17	Glossary & Abbreviations	CBRE EP&A
Volume III Technical Appendices		
2.1	EIA Scoping Report	CBRE EP&A
2.2	EIA Scoping Opinion & Subsequent Correspondence	SDC / CBRE EP&A
2.3	Technical Consultant CVs	CBRE EP&A
2.4	Climate change mitigation and adaptation assessment	CBRE
2.5	Human Health Technical Note	CBRE
2.6	Major accidents and disasters report	CBRE
3.1	Arboricultural Impact Assessment and Tree Retention Plan	Middlemarch Environmental Ltd.
3.2	Fort Halstead Summary Lighting Assessment 2019	Royal HaskoningDHV
3.3	Lighting Assessment 2015	Royal HaskoningDHV
3.4	Slope Stability Report	Waterman
3.5	Village Centre Detailed Design	JTP
5.1	Outline CEMP	CBRE
6.1	Socio-economics Technical Report	Hatch Regneris
7.1	Landscape and Visual Impact Assessment	LDA Design
7.2	AONB Report	LDA Design
8.1	Built Heritage Statement Site Wide	RPS
8.2	Built Heritage Statement Q14 Building	RPS
8.3	Archaeological Desk-Based Assessment	Waterman

CHAPTER/ APPENDIX	TITLE	AUTHOR
9.1	Preliminary Ecological Appraisal	Middlemarch Environmental Ltd.
9.2	Preliminary Bat Roost Assessment	Middlemarch Environmental Ltd.
9.3	Nocturnal Emergence and Dawn Re-Entry Bat Surveys	Middlemarch Environmental Ltd.
9.4	Bat Activity Surveys	Middlemarch Environmental Ltd.
9.5	Badger Survey - CONFIDENTIAL	Middlemarch Environmental Ltd.
9.6	Breeding Bird Survey	Middlemarch Environmental Ltd.
9.7	Botanical Survey	Middlemarch Environmental Ltd.
9.8	Terrestrial Invertebrate Survey	Middlemarch Environmental Ltd.
9.9	Reptile Survey	Middlemarch Environmental Ltd.
9.10	Dormouse Survey	Middlemarch Environmental Ltd.
9.11	Winter Bird Survey	Middlemarch Environmental Ltd.
9.12	Framework Ecological Mitigation Strategy	Middlemarch Environmental Ltd.
10.1	Transport Assessment	PBA
11.1	Fort Halstead Air Quality Assessment	Waterman
12.1	Baseline Noise Monitoring	Hydrock
12.2	Demolition and Construction Noise Assessment	Hydrock
12.3	Road Traffic Noise Assessment Calculations	Hydrock
12.4	Trace Minerals Explosive Summary	Hydrock
12.3.1	Figure 1 - Predicted Baseline 2018	Hydrock
12.3.2	Figure 2 - 2030 Without	Hydrock
12.3.3	Figure 3 - 2030 With	Hydrock
12.3.4	Road Traffic Noise Assessment	Hydrock
13.1	Desk Study, Ground Investigation and Data Assessment	Hydrock
13.2	Outline Remediation Method Statement	Hydrock
14.1	Flood Risk Assessment & Drainage Strategy report	Hydrock
14.2	Utilities Assessment report	Hydrock

DETERMINATION OF THE PLANNING APPLICATION

The Applicant has prepared and submitted to SDC an electronic copy¹ of the various volumes of this document that together constitute an ES under the EIA Regulations 2017. SDC has also publicised the planning application by display of a site notice, and, advertisement in a local newspaper and on SDC’s website:

<https://pa.sevenoaks.gov.uk/online-applications/>

In accordance with Regulation 19(3), once it has received the ES, the local authority shall:

- send to the Secretary of State within 14 days of receipt of the statement, one copy of the statement, a copy of the application and of any documents submitted with the application;
- forward to any consultation body, which has not received a copy directly from the Applicant, a copy of the ES and inform any such consultation body that they may make representations; and
- send a notice to any person who is likely to be affected by, or has interest in, the application, who is unlikely to become aware of it by way of a site notice or by local advertisement.

Determination Period

As per Regulation 19(6), SDC shall not determine the EIA application until the expiry of 30 days from the last date on which a copy of the statement was served to any of the consultees. The determination must also be made after the expiry of 30 days from the display of the site notice, from the date of publication in the local newspaper and from the date of advertisement on the Council’s website (whichever is later).

In contrast to a non-EIA planning application, which should be decided upon within either 8 or 13 weeks of submission, those applications accompanied with an ES are to be decided within 16 weeks of submission (Regulation 68(2)).

Copies of the ES & Comments on the ES

The ES and the planning application will be available to be viewed and downloaded at SDC’s planning applications website:

<https://pa.sevenoaks.gov.uk/online-applications/>

For anyone without personal access to the internet, the documents can be viewed online at any of SDC’s libraries through the computer/internet facilities available.

Comments on the planning application and ES should be addressed to Alison Salter, Team Manager (Development Management), at the address below or may be made online via SDC’s planning applications website.

¹ This is the number of copies previously agreed to be required for them to fulfil their requirements under Regulation 16(2)

INTRODUCTION

Sevenoaks District Council

Council Offices

Argyle Road

Sevenoaks

TN13 1HG

Paper copies of this ES can be obtained for £500.00 (to reflect printing and distribution costs) by contacting:

CBRE Ltd - Environmental Planning & Assessment

St Martins Court

10 Paternoster Row

London

EC4M 7HP

Alternatively, an electronic copy of the ES can be obtained for £10.00 by contacting CBRE at the above address.

Charges for paper and electronic copies of the ES are made in accordance with Regulation 24 of the EIA Regulations 2017.

Alternative Formats

The text size used in this document has been chosen to cut down on the quantity of paper required in its production. A large text version of this document is available upon request. Please note that printing costs may vary from those stated above.

1.3 WORKS CITED

[1] S. D. Council, "Local Development Framework: Core Strategy," February 2011.

[2] S. D. Council, "Allocations and Development Management Plan," February 2015.

[3] Ministry of Housing, Communities and Local Government, "Guidance - Environmental Impact Assessment," 2019. [Online]. Available: <https://www.gov.uk/guidance/environmental-impact-assessment>. [Accessed 02 September 2019].

[4] HM Government, "The Town and Country Planning (Environmental Impact Assessment) Regulations 2017," London, 2017.

[5] European Parliament & Council, "Council Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment," 2014.

[6] European Parliament & Council, "Council Directive 2011/ 92/ The Assessment of the Effects of Certain Public and Private Projects on the Environment," 13 December 2011.