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Friday, 21 August 2015

Planning Policy
Sevenoaks District Council
Council Offices, Argyle Road
Sevenoaks
Kent TN13 1HG

By email to: planning.policy@sevenoaks.gov.uk

Ref: Application for the development of 450 homes at Fort Halstead

Reference number: SE/15/00628/OUT

For the attention of Alison Salter, planning officer

Dear Ms. Salter,

I have been asked to write to you on behalf of the Knockholt Society to once again set out our objections to the proposed development of 450 homes at Fort Halstead and the recent amendments.

The Society objects to the application for detailed approval to two access points at Otford Lane/Crow Drive (described as 'primary') and Star Hill (described as 'secondary').

- **Star Hill** – Several previously expressed areas of concern have been reviewed in this amended consultation, not, however, the most important one for Knockholt village—the Star Hill exit. It is described as a ‘secondary’ exit but no measures are in place to define that. Throughout its operational history, even during peak employment years, this exit has *always* been restricted. It would be extremely dangerous to allow free flowing traffic to use this exit onto a derestricted road. Visibility is limited and traffic from the north is on a the brow of a blind hill. Proposed speed limits on Star Hill are unlikely to slow approaching traffic.

- **Traffic estimates** – At the Knockholt Parish Council planning committee meeting on Tuesday, 18 August, one councillor described these estimates as an insult to the intelligence of everyone living in the area. Like the planning committee, the Society has absolutely no faith in the figures provided by the traffic survey, and the findings are an insult to residents who know this area extremely well. The increase in traffic predicted at peak times of 26 vehicles is not just unrealistic, it’s laughable. As highlighted in D. Barton’s report, this is a development remote from essential services such as stations, schools and medical care—*car ownership will be essential*. With 450 homes, each with at least one car, is it reasonable to expect that only one car in every 17 will be used at peak times? This development will be at the highest point in Kent, and neither Polhill nor Star Hill offer suitable commuter routes for the average cyclist.

- **Primary/secondary** – as mentioned, the terminology of primary and secondary is wrong as the layout of the development means the majority of households are nearer Star Hill. Human nature means that drivers will take the shortest, quickest route. To expect hotel guests and staff to only use Polhill is unenforceable. The Society feels that the one way system proposed for buses should be used by *all*, leaving Star Hill for emergencies only and closed by some sort of barrier.

- **Danger** – Appendix F, table 3, states that between February 2009 and August 2014 there were seven minor accidents. *Nonsense!* There was at least one life changing accident during this period

And this year there has been a fatality on Star Hill.

- **Rushmore Hill** – The Society sees neither a need nor viability for traffic calming on Rushmore Hill. And given the traffic level increases predicted are so low, why would Rushmore Hill need any further measures?

- **Demolition of buildings and development of a mixed-use development** – Again, the Society objects to the application for 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);

This application has now been amended, and a summary of the main changes are:

- Changes to Polhill access-proposing a roundabout
- Provision of additional employment land
- Non-vehicular access improvements to Knockholt
- Retention of building M2
- Recycling facilities
- Additional information clarifying the landscape impact of any future proposed energy centre/laboratory use of the site
- Amendments to the bio-diversity and ecological mitigation proposed
- Building heights parameter plan amended to refer to maximum number of storeys, not height
- Amendments to internal pedestrian/cycle links
- Further information on affordable housing and viability
- Revised position for Qinetiq fence
- Additional information regarding the proposed heritage centre.
- **Otford Lane/Crow Drive** – The Society prefers a roundabout to traffic lights, but remains concerned about the effects of traffic on Otford Lane, which is narrow in several places yet will be the route from Fort Halstead to Halstead School. At peak times the dominance of traffic on Polhill may make it difficult for traffic joining from Crow Drive, making the Star Hill exit preferable for residents on the west side. As locals are aware, roundabouts do not always slow down traffic – as shown by several near misses at the Morants roundabout at the bottom of Star Hill and Polhil.
- **Employment-led** – SDC states this development is employment-led, yet in a previous survey stated that there are already sufficient commercial sites available in the district! With the redevelopment of Biggin Hill and the additional 35,000ft²

proposed at Nepicar Park – which has far better motorway access – why is there any need for this development?

- **Business unit compromise** – The Society thinks this proposed flexibility to be able to turn B2 units into residential units if not taken up, reflects the developer’s lack of confidence in this market! The Society finds this flexibility totally unacceptable in an ‘employment-led’ development: it will set an unwelcome precedent that could lead to the building of even more houses on this site.
- **Contamination** – No development should take place on this site until a full environmental survey has been completed. To rely on reports that have excluded some areas due to lack of access and make assumptions based on a ‘desk top’ exercise is totally unacceptable.
- **Affordable housing** – Again, if this is an ‘employment-led’ development, to state that it is only viable if the percentage of affordable housing is halved suggests that the developer believes the site’s profitability is all about houses, not commercial premises. Qinetiq acquired this land as a windfall, and this should be reflected in the viability calculations.

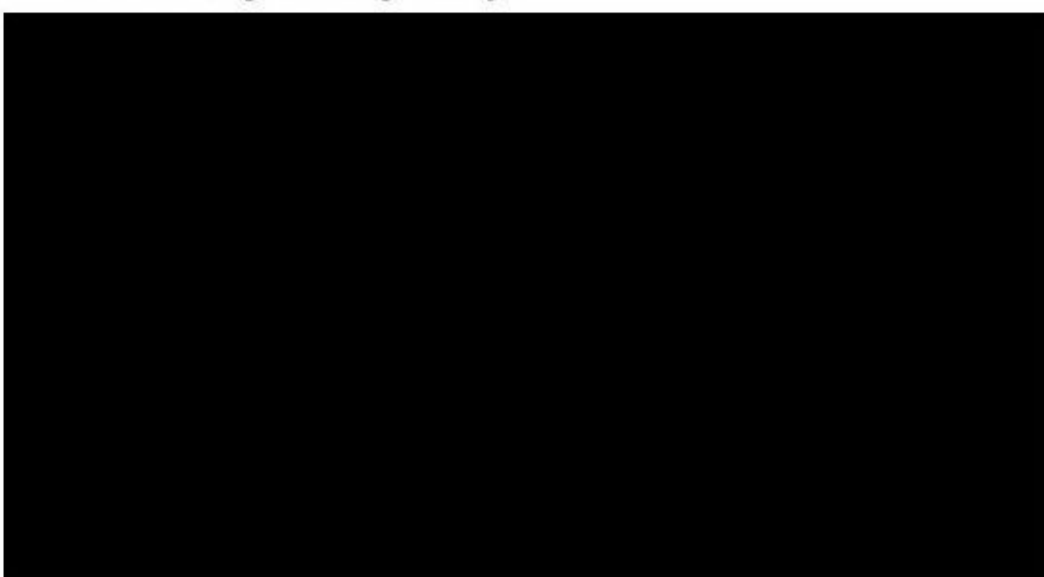
Further, affordable housing is a social responsibility and SDC should not allow a profit-making company to benefit to the detriment of families unable to afford to buy homes in the area they grew up in. The Society completely objects to the proposal to drop affordable housing from 40% to 20%.

Finally, SDC states that the development must be employment-led. It follows, therefore, that measures need to be in place to ensure that the business / industrial park is built *before* any housing commences.

If that does not happen, then as we’ve made clear before – and we believe the developer is making clear in its amendments – there is a very real danger that the developer will seek to replace business / industrial buildings with more profitable housing.

The Society urges SDC to enforce its own statement should this application have the misfortune to be granted.

Yours faithfully



On behalf of the Knockholt Society