
PLANNING STATEMENT ADDENDUM

Fort Halstead

June 2020

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1 Introduction

1.1 This Planning Statement Addendum has been prepared by CBRE Ltd on behalf of Merseyside Pension Fund ('the Applicant' hereafter) to accompany the amended planning application for the proposed redevelopment of Fort Halstead, Crow Drive, Sevenoaks, TN14 7BP ('the site' hereafter). The site is currently the subject of a hybrid planning application with reference 19/05000/HYB.

1.2 The description of development for the September 2019 submission under 19/05000/HYB was:

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.

1.3 Following consultation on the submitted planning application and post submission meetings with Sevenoaks District Council (SDC), as well as a number of statutory consultees, a number of amendments have been made to the scheme. Details of the amendments to the proposals are set out in Section 2 of this Planning Statement. In summary, the proposals maintain an employment-led redevelopment of the site to provide 27,773 sqm of employment floorspace and up to 635 dwellings.

1.4 The proposed description of development as discussed with Officers from SDC is:

Hybrid application comprising, in outline: development of business space (use classes B1a/b/c) of up to 27,773 sqm GEA; works within the X enclave relating to energetic testing operations, including fencing, access, car parking; development of up to 635 residential dwellings; development of a mixed use village centre (use classes A1/A3/A4/A5/B1a/D1/D2); land safeguarded for a 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

1.5 As part of the review of the proposals, a minor uplift of the outline employment floorspace is proposed from up to 27,659 sqm to 27,773 sqm. This uplift accounts for the basement space within Q13 and Q14.

1.6 The accompanying Environmental Statement accounts for the minor uplift and is within the parameters assessed in the Scoping Opinion for an Environmental Impact Assessment dated April 2019 (reference: PA/18/00488).

1.7 The planning policy position has changed since the 2019 submission with the cancellation of the Examination in Public of the new Sevenoaks District Local Plan and subsequent Inspector's Letter. Whilst the applicant understands a legal challenge has been made by SDC on the findings of the Inspector, it is considered that the weight attributed to the draft policies is *limited* in the context of this planning application.

Planning Statement Structure

1.8 This Planning Statement Addendum should be read in conjunction with the Planning Statement dated September 2019 which assesses the adopted local planning policies against the proposals. The Addendum is structured in the following manner:

- Section 2.0 describes the principal changes to the proposals;

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- Section 3.0 provides an overview of the design responses to the consultation comments received;
- Section 4.0 provides a further detailed assessment of the amended proposals in respect of applicable planning policies; and
- Section 5.0 summarises the amended proposals put forward.

Scope of Submission

- 1.9 This Planning Statement Addendum should be read in conjunction with the other documents which form part of this submission as well as the documents which formed the original submission in September 2019. The documents which form part of the amended documents submission comprise:

For Approval

- Site Location Plan
- Parameter Plans:
 - Land Use and Green Infrastructure
 - Building Heights
 - Access and Movement
- Detailed Plans for the Full Application component:
 - Q13/Q14 Bin and Cycle Store (Drawing No. 00556J_Q14-13_S19 Revision P2)
 - General Arrangement Hard and Softworks (Drawing No. 6699_1010 i)
 - Schedule of Accommodation

Supporting Documentation

- Illustrative Masterplan;
- Indicative Density Plan;
- Design and Access Statement;
- Community Infrastructure Levy Form;
- AONB Report and Statement;
- Heritage Note;
- Transport Technical Note;
- Environmental Statement Addendum;
- Viability Statement.

- 1.10 The supporting covering letter with the amended documentation sets out those documents which have been superseded as part of the May 2020 submission, and those which remain.

2 The Proposals

- 2.1 Section 2.0 of this Addendum summarises the key changes of the proposed development.
- 2.2 Following statutory and non-statutory consultation responses received on original submission made under 19/05000/HYB. The applicant has reviewed the design of the scheme and in light of these responses a series of amendments are proposed. In addition to design amendments, the supporting documentation as part of this resubmission addressed the consultation responses received, a summary of which is set out in Section 3.0.

Hybrid Planning Application

- 2.3 No changes to the structure of the hybrid planning application is proposed, with the 'detail' of the Outline component to be dealt with through the submission of Reserved Matters pursuant to the Outline Planning permission for each relevant phase. An area of the Village Centre comprises the detailed component of the application which comprises the change of use, refurbishment and extension of Q13 and Q14.
- 2.4 Q14 is a Grade II listed buildings and an application for Listed Building Consent has been submitted in tandem to the resubmission under 19/05000/HYB.
- 2.5 In accordance with the design changes, a change to the description of development is proposed:
- Hybrid application comprising, in outline: development of business space (use classes B1a/b/c) of up to 27,773 sqm GEA; works within the X enclave relating to energetic testing operations, including fencing, access, car parking; development of up to 635 residential dwellings; development of a mixed use village centre (use classes A1/A3/A4/A5/B1a/D1/D2); land safeguarded for a 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*
- 2.6 Only changes to the proposals are set out below, the remainder of the proposals are still in accordance with the original submission and are detailed in the Planning Statement (September 2019).
- 2.7 An indicative floorspace schedule by land use, including both the with and without school scenarios is in **Appendix A** of this Addendum.

Detailed Component

- 2.8 Minor amendments to detailed component of the application are proposed, which comprise:
- Revisions to the door alignments; and
 - Material detailing of the footway has been included on the hard and softworks plan.

Outline Component

Residential

- 2.9 The principle amendment to the scheme is the reduction in the proposed number of dwellings from 750 to 635. Whilst this still is an uplift from the extant consented permission of 450 dwellings (SE/15/00628/OUT), the proposed design represents a sustainable, high quality mixed use development.
- 2.10 The principle changes in respect of the residential parcels are:
- The site boundary has reduced to exclude the helipad in the north east area of the site;

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- Reduction in the proposed residential parcel and density of the Village Mews; and
- Overall reduction in the proposed building heights of the residential parcels.

- 2.11 An indicative density parameter plan is submitted as part of this resubmission which identifies an average density of 38.35 dwellings per hectare (dph).
- 2.12 The indicative residential mix maintains a suitable mix of unit sizes ranging from 1-5 bedrooms across various typologies. Although indicative, as set out in the accompanying Design and Access Statement the different Character Areas in conjunction with a mix of typologies and units will create a mixed and balanced community.
- 2.13 In line with the proposed changes to the residential parcels, the affordable housing provision has been adjusted. The Viability Assessment which accompanies this amended submission comprises details on the provision and two scenarios on the proposed tenure mix in conjunction with the ongoing discussions with SDC. The affordable housing will be delivered in phases as per the market housing and will be secured through the Section 106 Agreement.

Employment

- 2.14 In conjunction with the proposed amendments to the residential aspect of the Outline Planning Application, a minor uplift to the employment floorspace equating to the potential delivery of 27,773 sqm GEA across the site.
- 2.15 Further clarification is provided in respect to QinetiQ's current and proposed operations and uses within the site. The consolidation of all of QinetiQ's operations from across Fort Halstead within the X enclave will result in a mix of B1 (a), (b) and (c) uses, together with some ancillary B2 uses restricted to explosives testing/research, small scale, low volume explosives manufacturing in support of explosives testing/research and explosives disposal, as well as ancillary B8 uses for the storage of explosives. All of these activities currently take place at Fort Halstead and, where required, are fully compliant with Health and Safety Executive (HSE) Explosives Regulations 2014. The proposed changes will simply consolidate all of these to within the area of the X enclave.

Design and Landscaping

- 2.16 The principal design changes notwithstanding the wider residential amendments set out above, are to the character areas:
- The indicative density for the Village Mews Character Area is now 35-55dph which is reduced from the 50-60dph proposed;
 - The house typology in the Village Mews Character Area has changed from mainly terraced to a mixed less dense typology.
 - Semi-detached houses in the regular frontages, and car parking to be provided in a communal or shared courtyard or on plot between dwellings;
 - In the Mews frontage, it is proposed that terraced or linked dwellings will be provided, with an additional car parking typology in the form of on plot frontage parking. Innovative house types are encouraged;
 - The change in typologies in the frontages enables a larger area of open space and trees to be retained to the west of the Village Mews Character Area;
 - The indicative density range for the Anisbirches Walk Character Area is 25-55dph which is amended from 35-45dph;

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- The indicative density ranges for Beaumont Glade and Dutchmore Wood are 25-45dph and 45-55dph respectively; and
- The Gateway Hamlet proposed materiality is now only dark stained timber cladding.

Access and Movement

2.17 Several amendments are proposed in respect to improving access, movement and connectivity in respect of consultation comments received. These amendments comprise:

- Change in width of Crow Drive from 6.25m to 6.75m wide to facilitate a bus route;
- A new bus loop adjacent to the secondary access at Star Hill;
- Introduction of 'deflected junctions' as a traffic calming measure which is a design adjustment to the previous proposed 'squareabouts'.
- Permissive cycleway adjacent to SR172 forming part of the Public Right of Way improvements;
- Enhanced community bus provision through the alignment with the rail timetable to meet the frequent needs of both the business and residential users; and
- Additional provisional Travel Plan measures have been incorporated as part of the sustainable travel package.

Ecology

2.18 An indicative bat barn is proposed as part of the amended scheme which is located south-west of the site. The ecologist has identified this location as suitable and it is anticipated this enhancement and mitigation measure will be secured through a detailed Landscape and Ecological Management Plan.

Surface Water Drainage

2.19 An indicative surface water drainage strategy is provided as part of the ES Addendum in line with the proposed design amendments.

3 Consultation Response

- 3.1 Section 3.0 of this Addendum summarises how the consultation responses received on application 19/05000/HYB have been addressed in the resubmission and proposed design amendments.

Kent Downs AONB Unit

- 3.2 A written statement prepared by LDA Design accompanies the amended documentation as part of this submission, which specifically addresses the matters raised by the Kent Downs AONB Unit to the 750 dwelling scheme.
- 3.3 The redevelopment of Fort Halstead has been landscape driven with the proposals sensitively designed to integrate into the existing surrounding natural scenery. The design changes particularly the reduction in density, residential building heights and consequently the overall number of proposed dwellings to 635 are considered to address the concerns raised in the consultation response to perceived harm to the AONB.
- 3.4 The statement sets out the detailed design rationale for the proposals and the landscape and open space benefits which will be secured as part of the proposals.
- 3.5 The proposed design does not reflect that of typical AONB villages, and it is challenging to compare Fort Halstead with such villages as the site benefits from a unique history and has its own built development character. As detailed in the statement, the design purposefully draws on the rich history and distinctiveness of the site through the conservation and enhancement of the AONB.

Heritage

- 3.6 Further engagement was held with Historic England with a site visit held in March 2020. A statement prepared by RPS accompanies this application which sets out the discussions from this site visit and responds to the consultation response received on the hybrid planning application.
- 3.7 The applicant understands Historic England raised concerns on the proposed Village Centre design and the impact this has on the Fort in respect to design and proximity. As identified in the statement, the demolition of Q1 is proposed to facilitate the development of a Village Centre which is both stimulating in urban design and directs movement towards the Fort.
- 3.8 The Village Centre comprises substantial open space to retain an appropriate buffer between the proposed development and has been designed to maximise and open up the views from the proposed development into the Fort. The proposals will foster a positive relationship between the new development and the Fort in tandem with the wider public benefits delivered through the scheme. The impact to the significance of the Fort remains as less than substantial and is considered to not be greater than the extant permission.
- 3.9 An Outline Heritage Management Plan for the proposed Historic Interpretation Centre originally prepared in 2015 by the Heritage Collective and now updated by RPS to reflect the most up to date position as supporting documentation to this submission. The Management Plan outlines the historic points of interest in the Fort and broad principles for the Historic Interpretation Centre. It is proposed a detailed management plan will be secured in a Section 106 Agreement.

Transport

- 3.10 The applicant has held further meetings with KCC Highways to discuss the consultation response received to the pending hybrid planning application. A written statement prepared by Stantec accompanies this submission which details how the proposals and subsequent amendments address the comments raised by KCC Highways and Highways England.
- 3.11 The statement details the design amendments to the scheme, the additional surveys undertaken and rationale for the approach taken in respect of the Transport Assessment. The position of the CLEUD

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and the base point for the site in circumstances when DSTL vacate the site is elaborated on in respect of trip generation.

- 3.12 A Technical Note forms part of this submission to provide the supporting evidence for the exploration of an off road and on road segregated cycle route between the site and Knockholt as requested by KCC Highways. The note determines that due to the land and highways constraints, including the verge, a suitable segregated cycle route cannot be provided and the proposed enhanced provision of an on road cycle route remains the most appropriate solution to encourage cycle use in this location.

Design

- 3.13 The amended plans for the Village Centre address the urban design comments received. Further material detail of the proposed footpaths is included on the hard and softworks, as well as a realignment of the door in relation to the pedestrian connections in the Centre.

Ecology

- 3.14 The applicant consulted with SDC and Kent County Council Ecology following the consultation comments received. Updated Ecological Surveys, Framework Ecological Mitigation Strategy and Outline Landscape and Ecological Management Plan prepared by Middlemarch Environmental Ltd, form part of the supporting documentation to this submission.
- 3.15 The above documents address the consultation comments raised by KCC Ecology. Further information on the enhancement and mitigation measures for specific species are provided including a bat barn of which an indicative location is identified in the accompanying parameter plans.
- 3.16 A Landscape and Ecological Management Plan has been prepared which also includes measures to protect the Ancient Woodland and limit any negative impacts. It is intended that detailed LEMP's will be prepared in parallel to the detailed landscape plans for Fort Halstead. The outline Lighting Strategy prepared by Royal Haskoning which has been updated to accompany this resubmission, has had input from the ecologists to ensure minimal impact on the local biodiversity.

Noise

- 3.17 In conjunction with the amendments to the proposals, an updated noise assessment on road levels forms the technical appendices to the ES Addendum. The Addendum provides clarification on the assessment undertaken and the compliance with the relevant legislation as set out in the consultation response received from the Environmental Health Officer (EHO). Further engagement with the EHO has been held, and an assessment of Trace Mineral Explosives at QinetiQ accompanies this submission.

Trees

- 3.18 A new Arboricultural Impact Assessment (AIA) has been prepared by Middlemarch to accompany the amended submission for Fort Halstead.
- 3.19 The proposed design amendments to the scheme comprise alterations to the Village Mews character area including the retention of a larger area of existing trees adjacent to this area. As identified in the AIA, the proposed development may require the removal of 210 individual trees, which is lower than the previous September 2019 submission (252 potential trees). The applicant recognises the intrinsic value the existing trees and woodlands have in preserving and enhancing the landscape character of the site, and tree retention and cover is maximised across the development.
- 3.20 In response to comments received SDC's Arboricultural and Landscape Officer the AIA provides justification on the recommendation for felling trees. The Woodland Trust commented specifically on

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Trees 136 and 137 which are to be retained as part of the development, and further information on the characteristics of these trees are set out in the AIA. The proposals retain a 15 metres buffer zone to the Ancient Woodland in accordance with Natural England guidance.

Strategic Planning

- 3.21 The applicant has continued discussions with Kent County Council Education following the September 2019 submission of the hybrid planning application. The proposals comprise safeguarded land for a 1FE Primary School. Given the current position of the new Sevenoaks Local Plan and the reduction in the number of dwellings to 635, should it transpire due to lack of student numbers that KCC Education do not require a new 1FE Primary School by the end of the build out of the development, the land will become available for employment use. This mechanism is proposed to be secured in a Section 106 Agreement.

Public Right of Way

- 3.22 The applicant has engaged with Kent County Council Public Right of Way to inform the proposed access and movement parameter plan submitted as part of this amended documentation. No formal upgrades of the public footpaths are proposed as part of this development.
- 3.23 A new permissive cycle way adjacent to footpath SR172 to provide a shared route for both pedestrians and cyclists to Knockhalt. In accordance with the consultation response received from KCC PRoW, minor changes in terminology have been incorporated into the submitted Design and Access Statement.

4 Planning Policy Assessment

- 4.1 Section 4.0 assesses the proposed changes against the relevant planning policies. This section does not supersede the planning policy assessment included within the Planning Statement (September 2019) and should be read in conjunction with. Where the proposed amendments do not alter the policy assessment of the September 2019 submission, these have not been reproduced below.
- 4.2 As noted in Section 1.0, the emerging planning policy and subsequently the weight attributed to material considerations (in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004), for this hybrid planning application has changed since the September 2019 submission.
- 4.3 The Examination in Public for the emerging Sevenoaks Local Plan 2015 – 2035 was closed early due to the Inspector’s findings. The Inspector determined that the Local Plan had not met the statutory requirements of Duty to Cooperate and could not be found sound. Sevenoaks District Council have legally challenged this decision, therefore for the purposes of this hybrid planning application, draft policies are afforded *limited* weight.
- 4.4 For clarity, the adopted Development Plan and other material considerations as set out in the September 2019 submission are still applicable to this hybrid planning application.

Principle of Development in the Green Belt

- 4.5 As demonstrated in the Planning Statement (September 2019), the principle of redeveloping Fort Halstead is established through the adopted Development Plan and extant planning permission. The proposed development is considered to be appropriate development in accordance with part (g) of Paragraph 145 of the National Planning Policy Framework (NPPF):
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
- not have a greater impact on the openness of the Green Belt than the existing development; or*
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*
- 4.6 The proposals do not have a greater impact on the openness of the Green Belt than the existing development, constituting appropriate development. As detailed in the September 2019 Planning Statement, the proposals have no greater impact on openness through the principles of improving efficiencies in employment uses; efficient residential parcel layouts; removal of the ‘flue zone’ and hotel proposals; and redesign of the open spaces.
- 4.7 As Section 2.0 sets out, following consideration of the consultation comments received the proposed number of dwellings has been reduced which directly influences the proposed floorspace and density of the scheme.
- 4.8 In addition to the reasons and rationale detailed in the original submission, the amended scheme further demonstrates no greater impact on the openness on the Green Belt than the existing development by virtue of the following:
- The proposed residential development in the helipad in the north east area of the site has been removed and this area now falls outside of the application red line boundary. The area will therefore remain in situ as open space, with the redevelopment of Fort Halstead concentrated within the core previously developed land area of the site.
 - The approximate building footprint for development is 43,796 sqm (including a potential primary school). The approximate development footprint without the 1FE Primary School is 42,451sqm. As identified in the September 2019 submission, the existing building footprint comprises 60,686sqm as demonstrated through the CLEUD, therefore the amended proposals represent a significant

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reduction in building footprint and in addition there is a reduction in the areas of current hardstanding.

- In parallel to the proposals reducing to 635 dwellings, the proposed average density is also reduced to 38.35dph. The extant permission for 450 units had an average density of 34dph, whilst the 2019 submission had an average density of 43.66dph. The development will maintain provision of higher density dwellings in select parcels to deliver an efficient layout and suitable centre for the development which accords with the feedback received from the Design Review Panel. However, the overall reduction in the average density positively contributes to the openness off the site whilst maintaining distinct Character Areas and variation in built form.
- The proposed heights have generally been reduced with a maximum of up to 4 storeys proposed for the occasional landmark building in the employment/mixed use area. The reduction in building heights applies to most of the residential parcels within the core of the development with a typical reduction of 0.5 storeys from the 2019 proposals. The parameter plan does identify that in certain areas occasional taller buildings may be proposed, to stimulate visual interest and points of difference in the urban form.
- The reduction in the number of dwellings from 750 to 635 has reduced the indicative residential land use budget as identified in the illustrative masterplan by 0.59 hectares. This component of the application is in outline, however the reduction in residential capacity is considered to have a positive effect on the openness of the Green Belt in this location.

4.9 The Planning Practice Guidance and recent appeal decisions¹ clarify that openness is both a spatial and visual matter. The site benefits from a sense of enclosure through existing perimeter woodland of which includes ancient woodland and vegetation. As set out in the accompanying Landscape and Visual Impact Assessment, the proposals will improve the visual amenity and character of the site. Cumulatively the proposals and subsequent proposed amendments will not have a greater impact on the openness in visual terms.

4.10 The existing development comprises a significant number of buildings and hardstanding. The proposals significant reduction in building footprint and concentration of development within the existing previously developed land does not have a greater impact on the openness of the Green Belt in spatial terms.

4.11 As outlined above, the proposed amendments to the scheme would not constitute a greater impact on the openness of the Green Belt. The proposals therefore are appropriate development in accordance with paragraph 145(g) of the NPPF.

Kent Downs Area of Outstanding Natural Beauty

4.12 The proposed amendments to the scheme are not considered to change the planning policy assessment and public benefits which were clearly articulated in the September 2019 Planning Statement in respect of the Kent Downs Area of Outstanding Natural Beauty.

¹ Appeal: APP/Q3115/W/19/3230827

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- 4.13 The AONB report which formed part of the September 2019 submission, identifies that the proposed development would positively contribute to the natural beauty of the AONB whilst conserving and enhancing the Kent Downs and its setting in accordance with Core Strategy Policy LO8.
- 4.14 Paragraph 172 of the NPPF notes that within Areas of Outstanding Natural Beauty, the *scale and extent* of development should be limited. The site is previously developed land therefore a precedent in terms of scale and extent of development is established, notwithstanding the extant planning permission. As noted above the footprint of proposed development remains fully contained within the existing area of PDL and the overall footprint of the proposed development represents a significant reduction in comparison to the existing position.
- 4.15 The proposed amendments to the design will positively contribute to the conservation and enhancement of the AONB, through directing development into the heart of the site; reduction in the proposed number of dwellings; building heights and densities. Specifically, the lower indicative density ranges in the outer Character Areas and reduction in building heights are considered to reflect other AONB settlements in the area, whilst reinforcing the distinctiveness of the site through interspersed landmark buildings. The Village Centre is an important component of the development in terms of place making and as such comprises taller buildings to frame an attractive and inviting hub for the development, whilst inertly directing movement towards the Fort.
- 4.16 The September 2019 submission demonstrated that the scale and extent of the proposals is limited to that of the previously developed land and will visually improve the scenic beauty of the AONB. The design amendments as part of this submission, quantify that the proposals are limited in both scale and extent through lower land use budgets for development and reduction in heights and density.
- 4.17 As identified in the AONB written statement, the proposals will improve the visual amenity and character of the site through the integration of existing and new open spaces, trees of higher value and the woodland including protection and enhancement of all of the area of ancient woodland. The scale and extent of the proposed development has further reduced through these design changes reflecting the landscape driven design to the redevelopment of Fort Halstead. The amendments are therefore in accordance with both local and national policy.

Residential

Affordable Housing

- 4.18 A Financial Viability Appraisal (FVA) accompanies the amended scheme to reflect the proposals for 635 dwellings. In accordance with Core Strategy SP3, which seeks 40% affordable housing on site, except in exceptional circumstances where a viability assessment is required to be independently assessed where a reduced provision is proposed. The FVA demonstrates that the proposals maximise the affordable housing provision on site in consideration to the overall viability as well as the substantial costs associated with the initial phases of development.
- 4.19 The residential component of the hybrid planning application is in outline; therefore the detailed affordable housing mix will be subject to reserved matters application and would enable the development to provide appropriate types of accommodation for the affordable housing need at that given time.

Housing Mix

- 4.20 The proposals do not comprise a fixed unit mix as this will be formulated through reserved matters applications. An illustrative masterplan accompanies this resubmission demonstrating that the following housing mix could be delivered on site:

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1 bed	2 bed	3 bed	4 + bed
120 (19%)	131 (20.5%)	252 (39.5%)	132 (21%)

- 4.21 In accordance with Core Strategy Policy SP 5, the illustrative housing mix for both market and affordable units contributes to a range of different housing types to create sustainable and mixed communities. Smaller units form part of the proposed mix as it is considered the site is a suitable location in conjunction with the delivery of a new Village Centre. The proposals are also considered to broadly comply with the emerging requirements in draft Policy H1.

Housing Density

- 4.22 The average residential density of the site has been reduced to 38.35dph, with specific Character Areas indicative density ranges adjusted following statutory consultation responses received. The lower indicative densities are predominantly applicable to the Character Areas on the edge of the proposed development whilst retaining higher densities in the Village Centre. The difference in the indicative density ranges reflect the sensitive environmental and heritage designations of the site.
- 4.23 The design approach to the development reflects the aspiration of Core Strategy Policy SP7 and the draft allocation for the site, with identifying that higher densities should be sought in main settlements. The Village Centre and illustrative masterplan represents an efficient use of the land for both employment and residential, through delivery of a high quality and sensitively designed development which respects the local character.

Transport and Accessibility

Traffic Impact

- 4.24 An updated Transport Assessment and Travel Plan are provided as supporting documentation to this amended submission.
- 4.25 The proposed development will inevitably result in a modest increase in trip generation from the extant planning permission, through the proposed amendments the trip generations have decreased compared to the 2019 scheme. The Transport Assessment however recognises that in the absence of redevelopment and based on the existing site floorspace as determined by the CLEUD, the development would not result in a trip increase during the AM or PM peak hour.
- 4.26 In addition to the traffic surveys undertaken as part of the September 2019 submission, further traffic surveys have been undertaken in March 2020 for the M25 Junction 4 and the M25/A25/A21 junction. The proposed development has a negligible or minor impact on links to the local highway network, with no capacity issues identified for the local highway network and the M4, and only minor queuing at the Offord Lane/A224/ Crow Drive roundabout.
- 4.27 The safety design measures proposed as part of the September 2019 submission have not been altered and remain as part of the hybrid application proposals. The proposed scheme of 27,773 sqm of employment and 635 dwellings is concluded to not have significant impacts on the transport network.
- 4.28 The proposed amendments to the scheme are therefore in accordance with paragraph 109 of the NPPF and Development Management Policy T1.

Accessibility and Connectivity

- 4.29 As part of the ongoing discussions with statutory consultees and Go Coach, the proposed public bus strategy comprises the diversion of the existing number 3 (formally 431) service into the site and

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provision of a Demand Responsive Transport scheme from the site, previously referred to as the Community Bus service.

- 4.30 The Demand Responsive Transport scheme has been designed to align with commuter trains into and out of London at local railway stations. This will provide a frequent and reliable service for future users to enhance the public transport offering across Fort Halstead.
- 4.31 The proposed amendments to the 2019 submission through the introduction of an eyot for bus turning and permissive footway/cycleway along the SR172 improves the public transport and connectivity to and from Fort Halstead. The proposed amendments along with the other proposed improvements within the scheme will promote various methods of sustainable transport, whilst integrating into the surrounding pedestrian and cycle network in compliance with national and local planning policy.

Trees and Biodiversity

- 4.32 The retention of trees across the site has been a core design principle and place making feature in the overall masterplan. The design amendments which form this submission, have facilitated the retention of more trees than that previously identified with a 15m buffer maintained to the ancient woodland. All ancient woodland is preserved.
- 4.33 An updated Arboricultural Impact Assessment has been prepared by Middlemarch to reflect the proposed changes, and the trees identified for potential removal, mostly are assessed to have moderate or high value. However, the reduction in the trees identified for potential removal alongside the significant number of Category A and B trees to be retained will positively assist in contributing to the visual amenity of the site.
- 4.34 An Outline Landscape and Ecological Management Plan (LEMP) has been prepared to support the amendments to the proposals, which identifies measures and appropriate management for the site. It is envisaged detailed LEMPs will be prepared as detailed design through reserved matters applications become available.
- 4.35 The proposed amendments and additional information submitted on biodiversity are in accordance with NPPF paragraph 175.

Flood Risk and Drainage

- 4.36 In conjunction with the amendments to the proposed residential areas an updated Surface Water Drainage Strategy is provided in accordance with draft Policy CC1 and the NPPF.

Air Quality

- 4.37 The reduction in proposed traffic flows through the design amendments as stated in the ES Addendum does not change the conclusions made of the September 2019 submission which determined that the effect of the proposed development would be negligible.
- 4.38 The site is not located within an Air Quality Management Area (AQMA) however is located 90 metres east of an AQMA. The proposed development will not have an adverse impact on air quality both within and outside of the AQMA, and mitigation measures are recognised for the construction phase of the development, therefore is in compliance with paragraph 181 of the NPPF and Core Strategy SP2.

Noise

- 4.39 The proposed amendments do not directly impact the conclusions made in respect of noise in the September 2019 hybrid planning application submission. Additional information is provided of which the assessment identifies that in both construction and operation, the impact of the proposals will be negligible with appropriate mitigation measures in place. The proposed development therefore is in

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accordance with ADMP Policies EN2 and EN7 through ensuring no adverse impact on existing or future occupiers in respect of noise and preserving the character of the AONB and open countryside.

5 Summary

- 5.1 This Planning Statement Addendum has been prepared to support the amended documentation submitted pursuant to a pending Hybrid Planning Application 19/05000/HYB for the proposed redevelopment of Fort Halstead.
- 5.2 The amended proposals have been considered against the adopted Development Plan and relevant material considerations including the National Planning Policy Framework.
- 5.3 The design amendments proposed principally relate to the outline residential element of the hybrid planning application alongside necessary transport improvements. The proposed development will deliver numerous key benefits to both the site and local area as outlined in Conclusion section of the September 2019 Planning Statement, and these have not altered through the proposed amendments.
- 5.4 The proposals have been sensitively masterplanned to seamlessly integrated into the AONB, local landscape and designated and non-designated heritage assets.
- 5.5 The amendments to the submission are in accordance with both local and national planning policy and represent sustainable development to deliver an employment led, mixed use development.

APPENDICES

A Indicative Summary Floorspace Schedule

INDICATIVE SUMMARY FLOORSPACE SCHEDULE		INCLUDING PRIMARY SCHOOL	EXCLUDING PRIMARY SCHOOL
BUSINESS FLOORSPACE	USE CLASS	GEA (SQ M)	GEA (SQ M)
QinetiQ - Retained Buildings (X series)	B1a/b/c / B2 / B8	6,016	6,016
Innovation Hub Area E1 – Retained Buildings (A1, A3)	B1a/B1b	2,271	2,271
Innovation Hub Area E2 – Retained Buildings (A10, A11, A13, A14)	B1a/B1b/ B1c	2,202	2,202
Innovation Hub Area E2 – New Build (Buildings 1 & 2)	B1c	2,092	2,092
Innovation Hub Area E3 – New Build (Buildings C1–C4)	B1a/B1b/B1c	5,784	5,784
Innovation Hub Area E4 – Existing Buildings (X2, X3, X38)	B1c	492	492
Innovation Hub Area E5 – New Build (Buildings 3-6)	B1a/B1b/B1c	-	7,323
Village Centre Area M1 – Retained Buildings (Q13, Q14)	B1a/B1b	1,121	1,121
Village Centre Area M1 – New Build (Atrium)	B1a/B1b	196	196
Village Centre Area M3 – New Build (Block D)	B1a/B1b	276	276
Village Centre Area M4 – New Build (Buildings V1-V5)	B1a/B1b	5,975	-
Subtotal		26,425	27,773
VILLAGE CENTRE / FORT FLOORSPACE			
Village Centre Area M1 – Existing Building (Q14) – Community/Gym	D1/D2	282	282
Village Centre Area M2 – New Build (Block B) - Community	D1	270	270
Village Centre Area M3 – New Build (Block C) - Nursery	D1	240	240
Village Centre Area M3 – New Build (Block C) – Shop and Cafe	A1 & A3	520	520
Primary School – New Build	D1	1,345	-
Fort Area – Retained Buildings (F series) - Community	D1	1,794	1,794
Bunkers – Retained Buildings (M4, M5, M6, M20, M21, M22, M23, M24, R58, R59) - Community	D1	500	500
Subtotal		4,951	3,606
TOTAL FLOOR AREA		31,376	31,379

INDICATIVE RESIDENTIAL MIX	
Unit Size	Total
1b/2b FOG	10
1b flat	59
2b flat	83
2b terrace	99
3b terrace	108
3b semi	80
3b detached	64
4b semi	48
4b detached	48
5b detached	36
Total	635
Total Floorspace (sqm)	60,538

INDICATIVE SUMMARY SCHEDULE	USE CLASS	INCLUDING PRIMARY SCHOOL	EXCLUDING PRIMARY SCHOOL
Residential (no. of units)	C3	635	635
Residential Floorspace (sqm)	C3	60,538	60,538
Total Mixed Uses in the Village Centre (sqm)	A / B / D classes	8,880	2,905
Retail and Community in Village Centre - Areas M1, M2, M3, M4 (sqm)	A / D classes	1,312	1,312
Employment in Village Centre - Areas M1, M2, M3, M4 (sqm)	B classes	7,568	1,593
Total Employment Uses (sqm) incl. Village Centre (excl. QinetiQ)	B classes	20,409	21,757
1FE Primary School (Ha)	D1	1.06 Ha	-
1FE Primary School (floor space)	D1	1,345	-
QinetiQ (sqm)	B classes	6,016	6,016
Fort Area (sqm)	D1	1,794	1,794
Retained Bunkers (sqm)	D1	500	500
<i>*This summary schedule should not be totalled</i>			