

PLANNING STATEMENT

FULL PLANNING APPLICATION FOR WORKS TO THE QINETIQ ENCLAVE AT FORT
HALSTEAD

SUBMITTED ON BEHALF OF QINETIQ

JUNE 2021

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1 INTRODUCTION

1.1 This Planning Statement has been prepared in support of an application to establish an employment enclave for occupation by QinetiQ within Fort Halstead, Crow Drive, Halstead, Sevenoaks ('the site'). The site is located within the administrative area of Sevenoaks District Council ('the Council').

1.2 The application is submitted on behalf of QinetiQ Ltd (hereafter referred to as 'the applicant').

1.3 The application seeks planning permission for:

"Works to the proposed QinetiQ enclave comprising the erection of perimeter security fence, erection of a new reception building, creation of a new main site entrance along Crow Drive, refurbishment of existing buildings including plant installation, creation of a new surface level car park and access, installation of two new explosive magazine stores and surrounding pendine block walls, demolition of existing buildings, installation of 6no. storage containers, installation of new site utilities, landscaping and ecological works".

1.4 In addition to this statement and the required forms the application comprises the following reports:

- Full suite of architectural drawings prepared by BakerHicks;
- Arboricultural Impact Assessment prepared by Middlemarch;
- Arboricultural Method Statement prepared by Middlemarch;
- Archaeological Assessment prepared by Waterman;
- Badger Survey prepared by Middlemarch;
- Bat Mitigation Strategy prepared by Middlemarch;
- Bat Protection Strategy prepared by Middlemarch;
- Bat Winter Hibernation Survey prepared by Middlemarch;
- Biodiversity Net Gain Assessment prepared by Middlemarch;
- Built Heritage Assessment prepared by RPS;
- Construction Ecological Management Plan (CEMP) prepared by Middlemarch;
- Design and Access Statement prepared by BakerHicks;
- Drainage Assessment prepared by BakerHicks;
- Ecological Mitigation Strategy prepared by Middlemarch;
- Flood Risk Assessment prepared by Hydrock;
- Geo-Environmental Assessment prepared by Hydrock;

- Landscape and Ecological Management Plan (LEMP) prepared by Middlemarch;
- Preliminary Bat Roost Assessment prepared by Middlemarch;
- Preliminary Ecological Appraisal prepared by Middlemarch;
- Remediation Strategy prepared by Hydrock;
- Transport Assessment prepared by Stantec; and
- Travel Plan prepared by Stantec.

1.5 An Environmental Impact Assessment Screening Opinion under part 2, regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 was submitted on 31st March 2021. On 21st April 2021, the Council confirmed that the nature, scale and location of the development would be unlikely to result in significant environmental effects therefore the development does not constitute EIA development. Any potential impacts of the development can therefore be fully assessed through the above list of technical reports.

1.6 The following sections of this report:

Section 2 – describes the site and surrounding area

Section 3 – reviews the site's relevant planning history

Section 4 – describes the proposals, in particular the relationship to the remainder of Fort Halstead

Section 5 – summarises the pre-application process

Section 6 – outlines the planning policy framework relevant to the proposals

Section 7 – assesses the proposals against policies in the development plan and national policy guidance

Section 8 – concludes that planning permission should be granted.

1.7 Overall, the applicant considers that the submitted documents present a compelling case for the proposed development which complies with the development plan and national policy guidance, and therefore planning permission should be granted.

1.8 The technical reports submitted in support of the application contain detailed information such that it is the applicant's contention that the grant of planning permission should not be subject to pre-commencement conditions requiring submission of further material that would delay the construction of the enclave.

2 SITE CONTEXT

- 2.1 The section of the Statement describes the site, its location and context within the wider Fort Halstead site and the surrounding area.

The Wider Fort Halstead Site

- 2.2 The QinetiQ enclave sits within the wider site known as Fort Halstead.
- 2.3 Fort Halstead is located on Crow Drive, approximately 8 km northeast of Sevenoaks on the edge of the North Downs and is approximately 1 km to the west of the M25 motorway. It is situated within the administrative area of Sevenoaks District Council. Fort Halstead is situated to the top of Star Hill, upon a steep escarpment.
- 2.4 The Fort Halstead site currently comprises a secured employment site, occupied by Defence Science and Technology Laboratory (DSTL) and QinetiQ (the applicant), which sits principally within a secure fence, with a canteen, visitor reception area and visitor car park outside of the fence. The function of the site is a Research and Development facility and includes the storing and use of high-grade explosive material amongst other military research activities. However large areas of the site are no longer in active use as they have been decommissioned by DSTL due to their impending move from the site.
- 2.5 Fort Halstead now consists primarily of office buildings, workshops and laboratories built throughout the twentieth century. There were previously around 350 buildings on site; however, in recent years this number has declined due to an ongoing process of demolitions by DSTL as they incrementally move their operations away from Fort Halstead. Currently, there is an estimated 276 buildings on site.
- 2.6 A Scheduled Ancient Monument, known as the Fort, sits to the east of the proposed QinetiQ secured enclave (the site). The Fort is polygonal in shape and is surrounded by an earth rampart and a deep external ditch which runs around almost all of the Fort, although it is infilled at the northeast edge. The Fort comprises a number of buildings and structures, three of which are statutorily listed (one is Grade II and two are Grade II*). A further Grade II listed building sits outside of the Fort to the north. These buildings and the Scheduled Ancient Monument are of national heritage significance because of their role in the defence of London in the nineteenth century and strategic armaments research during the twentieth century.
- 2.7 The entire Fort Halstead site is located within the Kent Downs Area of Outstanding Natural Beauty as well as the Metropolitan Green Belt. It also comprises large areas of woodland including approximately 45 ha of designated Ancient Woodland and open space. The site is not located within a Conservation Area.
- 2.8 A Tree Protection Order (TPO) encompasses the entirety of the site.
- 2.9 The site is located within Flood Zone 1.

The Site

- 2.10 The planning application site extends to 15.8 ha and sits within the wider Fort Halstead site. The site is known as the QinetiQ enclave and is located on the southernmost boundary of the wider Fort Halstead site. The application site is bound by Crow Drive to the north, a walkway which separates the Scheduled Ancient Monument from the proposed enclave to the east, ancient woodland to the west and the existing site perimeter fence to the south.
- 2.11 The enclave comprises approximately 78 existing buildings, the majority of which are situated to the north of the site; there is little built development to the south of the enclave. These buildings are a mix of B1, B2 and B8 uses. Much of the enclave comprises soft landscaping and tree cover, particularly to the south of the site.
- 2.12 In terms of access, there are two gated vehicular accesses to the secure part of the wider Fort Halstead site. This includes a main access from Crow Drive (off from the A224 at Polhill) to the east as well as a secondary access with limited opening times onto Star Hill to the west. Access is then gained to the enclave via Crow Drive which sits to the north of the site.
- 2.13 In terms of relevant designations, the site wide designations as discussed above all encompass the application site.

3 PLANNING HISTORY

- 3.1 The wider Fort Halstead site comprising 75ha of land has a long planning history.
- 3.2 In 2011, DSTL announced its intention to relocate all of its operations from Fort Halstead to Porton Down and Portsdown West. As a result of DSTL's announcement, Armstrong (Kent) LLP as the previous owners of the site, obtained outline planning permission (OPP) approval in December 2015 for the redevelopment of the site as follows (ref: SE/15/00628/OUT):

'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), 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).'

- 3.3 The OPP had all matters reserved, save for details of the means of access to the site Polhill and Star Hill Road. The OPP was brought forward in accordance with the site-specific policy included within the Council's Allocation and Development Management Policies (ADMP) Policy EMP3 for an employed-led scheme which included 450 dwellings.
- 3.4 Further to the 2015 planning permission, DSTL confirmed that they expected to fully vacate the site in 2023, and in February 2017, Merseyside Pension Fund (MPF) purchased the site from Armstrong (Kent) LLP. MPF undertook a review of the planning position with regards to the masterplanning of the site in parallel with the Council's emerging Local Plan process which identified the site for removal from the Green Belt and allocation for mixed-use development including employment land and up to 750 new homes.
- 3.5 In September 2019 a revised hybrid planning application was submitted by MPF (ref: 19/05000/HYB) for the following:

"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".

- 3.6 Following consultation on the above planning application, a number of amendments were made to the scheme to include a minor uplift of the outline employment floorspace and a decrease in the number of proposed residential units. The proposed description was amended in June 2020 to:

“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”.

- 3.7 The most recent 2019 hybrid planning application is expected to be determined at a Special Planning Committee in July 2021.
- 3.8 Both planning applications included illustrative and indicative proposals for the formation of the QinetiQ ‘X’ enclave that is the subject of this full planning application. Consistent with the OPP, the recently submitted hybrid planning application seeks to consolidate QinetiQ’s operations to the southernmost boundary of the site within a secure enclave. The hybrid application acknowledges that QinetiQ require a secure demise to continue their operations therefore details for a fence encompassing the full enclave have been provided as part of that application. The hybrid application includes illustrative proposals identifying QinetiQ’s enclave in outline but does not seek detailed planning permission for the specific proposals for the enclave.
- 3.9 The majority of existing buildings within the enclave are proposed for retention with any future demolitions shown on the submitted Demolition Parameter Plan. The hybrid application submission documents confirm that a total of 27,773 sqm (GEA) of employment floorspace across the Fort Halstead site will be delivered, including 6,016 sqm (GEA) of floorspace which will be retained as part of the proposed QinetiQ enclave. In March 2021, CBRE, on behalf of MPF submitted a proposed amendment to the hybrid planning application. This comprised an update in relation to the submitted Demolition Parameter Plan, specifically the buildings proposed for retention and demolition within the QinetiQ enclave. The proposed changes included the retention of an additional four buildings comprising 1,543.07 sqm of existing floorspace but the additional demolition of two existing buildings comprising 28.98 sqm of floorspace. Subsequently, the total of floorspace within the enclave, as proposed by the currently undetermined hybrid planning application, is 7,530.09 sqm.
- 3.10 All plans submitted in support of the proposals that are the subject of this full planning application are consistent with the proposals submitted as part of the 2019 wider hybrid application.
- 3.11 The approved OPP made provision within the enclave for the siting of a new three-storey headquarters office building in the western corner, close to the Star Hill Road entrance. This building is not proposed as part of this full planning application.

- 3.12 The retention of the applicant on site formed part of the Council's decision to grant planning permission for 450 homes in 2015, as specifically stated within the associated committee report. The consolidation and relocation of QinetiQ's functions within the enclave was accepted and welcomed by the Council.
- 3.13 Most recently, and in respect of the proposed QinetiQ enclave, planning permission was obtained by QinetiQ in October 2019 for the relocation and reinstallation of explosive magazine stores and construction of concrete pendine block walls within the proposed enclave (ref: 19/02447/FUL). This application was the first phase of proposals submitted in preparation of DSTL's departure from Fort Halstead.

4 THE PROPOSALS

- 4.1 This section of the Statement summarises the proposals and a detailed description is contained within the Design and Access Statement submitted in support of the application.
- 4.2 As explained in Section 3, in 2011 DSTL announced its intention to relocate all of its operations from Fort Halstead to Porton Down and Porton Down West by 2023. At present, QinetiQ's buildings are distributed across the wider Fort Halstead site and DSTL operate and manage security across the whole site. When DSTL leave at the start of 2023, the fencing and security gate will contract within the site to form the enclave within which all of QinetiQ's operations will take place. QinetiQ's requirement to remain on site following DSTL's departure forms one of the key drivers of the wider Fort Halstead application.
- 4.3 With the approval of the 2015 OPP, it was assumed that there would be enough time for submission and approval of the reserved matters for the formation of QinetiQ's secure enclave and for the works to be completed before DSTL's departure. Even with the submission of the revised application in 2019, it was hoped that the required timetable could be met.
- 4.4 However, although the 2019 application is nearing the point of determination, it is a hybrid application and it does not seek detailed approval of QinetiQ's enclave. Given the works have to be completed by the end of 2022 and will take in order of a year to complete, QinetiQ has worked up the detailed design of the works for the enclave, and the applicant is now in a position to submit proposals for a secure enclave in order to meet their operational requirements in preparation of DSTL's departure from the site.
- 4.5 The content of the planning application has been prepared in consultation with MPF and their planning advisors, CBRE, as well as members of the technical project team, to ensure compliance between this application and the 2019 hybrid application.
- 4.6 In summary, this application seeks permission for:

"Works to the proposed QinetiQ enclave comprising the erection of perimeter security fence, erection of a new reception building, creation of a new main site entrance along Crow Drive, refurbishment of existing buildings including plant installation, creation of a new surface level car park and access, installation of two new explosive magazine stores and surrounding pendine block walls, demolition of existing buildings, installation of 6no. storage containers, installation of new site utilities, landscaping and ecological works".

4.7 The application proposals are broken down in further detail below.

Perimeter Fence

- Due to the nature of QinetiQ's work, they require a new secure fence which sits around the perimeter of the proposed enclave.
- An existing perimeter fence sits along the southern boundary. This fencing is to remain.
- A 2.9m high weldmesh and barbed wire fence is proposed to be installed along the north, east and west perimeter of the enclave.
- The fence will be constructed of 2.44m high weldmesh panels which will be topped with 3 strands of barbed wire measuring 0.46m. All panels and posts will be coated dark green in colour.
- Approximately 100m of the perimeter fence proposed along the western edge of the application site will rise to sit 4m high, as opposed to 2.9m, as a result of the existing topography which steeply rises by 1m beyond the fence line in this location.
- All vehicle and pedestrian gates along the fence line will be of similar construction.

New Reception Building (X83)

- A new single storey reception building is proposed to the north of the site, set back against Crow Drive.
- The reception building will have a footprint of just 93.28sqm.
- The building will be of modular construction and will comprise brickwork cladding and aluminium panels.

Refurbishment and Extension of Existing Building X78

- Both external and internal refurbishments to the existing building known as X78, situated to the west of the proposed new reception building.
- External refurbishment works will comprise the removal of the existing chimney, replacement of all windows along the eastern building elevation, new CCTV installation, brick infill of 4no. windows along the western elevation and new lighting installation.
- The existing X78 building will be extended to the west to accommodate a single storey 28.07sqm internal plantroom at ground floor level.

Erection of External Plant

- X78- In addition to the proposed new internal plant room which will be accommodated within the building extension, a new external plantroom with screened enclosure is proposed to the south of the proposed extension.

- X48- The replacement of existing plant and the addition of new external plant and gantry is proposed to the southwest corner of building X48. The proposals will extend the existing chiller compound by 1.2m west as well as replace the existing supporting oil tanks located within a storage yard with two Air Source Heat Pumps (ASHPs). The maximum height of the gantry would be 4m and would be required to support the new ducts and cables from the ASHP to building X48. The new plant will be erected on existing hardstanding.
- X79- New external plant including air handling units and gantry is proposed to be installed to the east of the existing building. The new gantry will be required to support the new ducts and cables from the external plant room to building X79.
- X23- New external plant and gantry is proposed to the north of the existing building. The new gantry will be required to support the new ducts and cables from the external plant room to building X23.

Installation of Magazine Stores

- As part of a separate full minor application which has been submitted following this major planning application, two existing magazine stores are proposed to be removed from outside of the QinetiQ enclave. As part of the proposals that are the subject of this application, permission is sought for the installation of these magazine stores within the enclave and will be supported by new concrete bases.
- Planning permission was granted in October 2019 for the relocation of store X24.1 to sit outside of the enclave on an area of hardstanding next to building A26. X24.1 will now be relocated back within the enclave to the south of the existing store known as X24.
- As part of the October 2019 planning permission the store known as F02.1, located outside of the enclave within the Fort, was proposed to be relocated elsewhere within the Fort. This store is now known as X51.2 and will be relocated to the enclave to the south of the existing store known as X51 and following relocation will be known as X51.2.
- Both magazine stores are single storey steel containers, approximately 2.2m x 3.1m x 2.5m (height) in dimension. X24.1 has a flat roof and is dark blue and grey in colour. X51.2 is similar in dimension however has a sloped roof and is light grey and white in colour.
- New concrete pendine block walls are proposed to be constructed surrounding the magazine stores. These will be 2.4m in height and constructed of 610 x 610 x 1930 modular blocks in fair face finish.

Installation of Storage Containers

- Following the demolition of existing building X51, the floors slab will be retained and will become a base to support 6no. 20ft standard ISO storage containers.
- The containers will be matt green in colour to allow for any visual impact to be softened. They will be located to the southeast of the site, a considerable distance from the Crow Drive northern site boundary so will not be visible from outside the site boundary.

- Once installed, the containers are expected to be a permanent storage solution and it is not expected that the containers will be moved or relocated at regular intervals.

Car Parking and Access

- Access to the proposed enclave is via a roundabout off Crow Drive. The re-modelling of Crow Drive has been addressed separately under the 2019 wider Fort Halstead hybrid planning application.
- In total, 115no. standard parking spaces plus 8no. wheelchair parking spaces are proposed; this will utilise 29 existing parking spaces.
- Upon entry to the site visitors will be directed to a new visitor car parking area which comprises 9no. spaces (including 2no. wheelchair parking spaces). This will be located along Crow Drive to the northwest of existing building X48.
- A new staff carparking will provide 125no. car parking spaces.
- A new guard post and barriers will control pedestrian and vehicular entry into the site.

Installation of Site Utilities

- New site-wide utilities are proposed. Approximately 5no. substation buildings are proposed to be built to support the new site wide electrical network installation.
- The substations will be constructed from GRP enclosures with an external area surrounding by 2.4m high palisade fencing.

Demolition of Existing Buildings

- Approximately 2,332.24 sqm of existing floorspace will be demolished within the enclave as part of the proposals.

- 4.8 In summary, the proposals that are the subject of this planning application are consistent with the previous proposals for the QinetiQ enclave approved in the 2015 OPP and are contained within the 2019 hybrid planning application. One important change with the 2015 OPP is that QinetiQ is not proposing a three-storey office building in the north west corner of the enclave.
- 4.9 As a result of DSTL's departure from the site at the start of 2023, QinetiQ are required to submit a separate detailed application for the creation of the secure enclave to enable works to begin later in 2021 (following the grant of the hybrid permission) and be completed by the end of 2022.
- 4.10 The proposals will ensure the retention of QinetiQ at the site, a key employer within the district, providing a high-quality employment site that sits within the heart of Fort Halstead.

5 PRE-APPLICATION ENGAGEMENT

- 5.1 On 23rd February 2021, a pre-application meeting took place between the Council, the applicant and Carter Jonas to discuss the development proposals.
- 5.2 At the meeting, a summary of the design and development proposals were presented by the project team and a justification for the proposals was explained.
- 5.3 The applicant has considered the pre-application feedback received from the Council and the submission material responds to the guidance that was provided.
- 5.4 The Council issued their formal pre-application advice letter on 12th March 2021. Feedback from the pre-application meeting was supportive of the principle of the development with the formal advice noting the following key points:
- The principle of consolidation of the QinetiQ enclave is welcomed.
 - Although the site is proposed for removal from the Green Belt within the previously emerging Local Plan, the adoption of this has been delayed therefore the Council must still apply national and local Green Belt policies in its consideration of any planning application.
 - The proposed extension to X78 would constitute appropriate development in the Green Belt.
 - It is understood that the proposed fencing forms a fundamental element of QinetiQ's ability to remain on site.
 - The inclusion of a buffer on the outer side of the proposed fence for landscaping would be a welcome addition.
 - Whilst the planning application constitutes a major development for validation purposes as a result of the site area, what constitutes major development is at the decision maker's discretion and the Council may consider that paragraph 172 of the NPPF is not applicable in this instance.
 - It is considered that the proposals would have little impact on the setting of the nearby heritage assets including the Scheduled Ancient Monument.
 - The removal of a number of protected trees in order to facilitate the proposals is unlikely to pose any impact on the designated ancient woodland.
 - The highways implications of the proposals should be integrated into the transport assessment for the wider Fort Halstead development as well as demonstrating the transport implications of the application proposal independently.
 - It is recommended that the proposals be compliant and consistent with the assumptions that have informed the wider Fort Halstead application.

- 5.5 The application proposals and planning application submission have subsequently been prepared in light of the pre-application meeting and feedback received.
- 5.6 QinetiQ has not undertaken separate community engagement to the extensive engagement that MPF/CBRE have undertaken in respect of the 2019 hybrid planning application which includes details of the principle of the proposed QinetiQ enclave.

6 PLANNING POLICY CONTEXT

6.1 This section of the Statement provides an overview of the planning policy documents and guidance relevant to the Council's determination of the planning application.

The Development Plan

6.2 Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that the determination of planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise.

6.3 Sevenoaks District Council's Development Plan in this case is comprised of the following:

- The Core Strategy (2011); and
- Allocations and Development Management Plan (ADMP) (2015).

6.4 The Core Strategy sets out the vision, spatial strategy and Core Policies that are used to shape the future development in the district up to 2026. The ADMP contains the site allocations and day-to-day policies against which planning applications are assessed.

6.5 In respect of Fort Halstead, the key references and designations are:

- It is a Major Developed Site in the Green Belt extending to 41.0 ha (Core Strategy, para 4.5.16)
- It is a Major Developed Employment Site in the Green Belt (ADMP, para 4.10)
- It is a major employer in the District (ADMP, para 4.12)
- It is an important employment generating site (ADMP, Policy EMP2)
- Proposals for the site's redevelopment should be 1) employment led and provide for the retention of QinetiQ 2) deliverable 3) comprehensive and secure a viable future for QinetiQ on the site 4) comply with sustainable development principles, and 5) result in no greater increase in the impact of the openness of the Green Belt and AONB (ADMP, para 4.18)
- Policy EMP3 confirms that redevelopment proposals would be expected to:
 - Be sustainable in respect of the location, uses and quantum of development and be accompanied by a Travel Plan incorporating binding measures to reduce dependency of future occupants on car use;
 - Provide accessibility to jobs, shops and services by public transport, cycling or walking, including proposals for onsite provision proportionate to the proposed development;

- Make a positive contribution to the achievement of aims and objectives of the Kent Downs AONB Management Plan and conserve and enhance the natural beauty and tranquillity of the Kent Downs Area of Outstanding Natural Beauty;
- Confirm, by way of a Transport Assessment, that the development would not have an unacceptable adverse impact on the local and strategic road network;
- Protect and integrate the Scheduled Ancient Monument and listed buildings into the development with improved access and setting;
- Integrate existing dwellings located in close proximity to the boundary of the Major Employment Site into the new development;
- Incorporate principles of sustainable design and construction to minimise energy consumption in its construction and operation;
- Improve the provision and connectivity of green infrastructure, including the protection, enhancement and management of biodiversity and the provision of improvements to the Public Right of Way network; and
- Provide for a comprehensive development and include a phasing plan, including phasing of infrastructure provision, showing how each phase of the development will contribute to the implementation of the policy.

Material Considerations

- 6.6 There are a number of other relevant documents that will be considered material to the determination of this planning application and these include:

Previously Emerging Policy

- 6.7 The Sevenoaks Draft Local Plan was submitted to the Secretary of State for independent examination in April 2019.
- 6.8 In March 2020 the Planning Inspector concluded that the Local Plan was unsound as it failed in its statutory Duty to Cooperate. The High Court backed the Inspector's ruling in November 2020 and in December the Council asked for permission to challenge the Judicial Review that upheld the Planning Inspector's reasons for rejecting the draft Local Plan. The Council was informed in April 2021 that it has not succeeded with the challenge.
- 6.9 The wider Fort Halstead site, which includes the application site, benefited from an emerging allocation for a mixed-use development incorporating business uses and up to 750 residential units. The site was also proposed for removal from the Green Belt. Given the current position of the draft Local Plan, the proposals will be assessed predominately against the current Development Plan and the NPPF, but the previous emerging

policy support for the redevelopment of the site, including the removal of the site from the Green Belt is considered to be a material consideration.

The National Planning Policy Framework

6.10 The revised National Planning Policy Framework ('NPPF') was published in February 2019 and sets out the Government's planning policies for England and how these are expected to be applied.

6.11 Paragraph 7 states that the purpose of the planning system is to contribute to achieving sustainable development of which there are three dimensions – economic, social and environmental. Paragraph 8 sets out these roles, recognising that these roles are mutually independent and they should be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives. The planning system needs to contribute to a competitive economy by: ensuring that sufficient land of the right type is available in the right places at the right time; support communities by ensuring that a sufficient number and range of homes can be provided by fostering a well-designed built environment with accessible local services and open spaces; and protecting and enhancing the natural, built and historic environment including making effective use of land.

6.12 Paragraph 10 of the NPPF states that:

"So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development"

6.13 The document goes on to explain that, for decision-taking, development proposals that accord with an up-to-date plan should be approved without delay and that, where a development plan is absent or relevant policies are out-of-date, planning permission should be granted unless:

"i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed ; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

6.14 The NPPF also contains very clear advice on decision taking and states at Paragraph 38 that:

"Local planning authorities should approach decisions on proposed development in a positive and creative way... work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."

6.15 The purposes of the Green Belt are set out at paragraph 134:

- a) to check the unrestricted sprawl of large built-up areas
- b) to prevent neighbouring towns merging into one another
- c) to assist in safeguarding the countryside from encroachment
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.16 Paragraph 145 states that the construction of new buildings are inappropriate in the Green Belt unless the proposals comprise:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- 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

6.17 Paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. It goes on to state that major developments within these designated areas should be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

6.18 Footnote 55 states that for the purposes of paragraph 172, whether the proposal is a 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

6.19 Paragraph 175 confirms that where development results in the loss of ancient woodland and ancient or veteran trees, planning permission should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Other Material Considerations

6.20 The following documents are also material considerations in the determination of this planning application.

The Planning Practice Guidance

6.21 The Planning Practice Guidance ('PPG') website was launched on 6th March 2014 and then updated in October 2019. It replaces and consolidates 7,000 pages of planning guidance on topics including the Green Belt, flood risk and design, and it should be read in conjunction with the NPPF.

6.22 One particular element to highlight concerns the use of pre-commencement conditions. Paragraph: 007 Reference ID: 21a-007-20180615 states that "care should be taken when considering using pre-commencement conditions that prevent any development authorised by the planning permission from beginning until the condition has been complied with." It is demonstrated in the next section that full information is submitted with this planning application and that the imposition of pre-commencement conditions is unnecessary.

7 ASSESSMENT OF THE PROPOSALS

7.1 This section of the Statement assesses the proposals against relevant national, regional and local planning policies and guidance. It informs the decision on whether or not planning permission should be granted. Where the assessment refers to detailed technical issues, this section should be read in conjunction with the relevant specialist reports and plans (see planning drawings list) accompanying the application as listed in Section 1.

7.2 The planning considerations for the proposals are:

- Principle of Development:
 - Principle of Development (Employment)
 - Principle of Development in the Green Belt and impact on openness
 - Principle of Development in the AONB
- Transport and Highways
- Environmental Policies:
 - Trees and Biodiversity
 - Ground Conditions
 - Flood Risk and Drainage
- Heritage and the Historic Environment

Principle of Development (Employment)

Policy Context

7.3 The principle of redevelopment at Fort Halstead is well established in planning policy and through the grant of planning permission.

7.4 The 2011 adopted Core Strategy Policy SP8, 'Economic Development and Land for Business' seeks the retention, intensification of existing business areas, including Major Developed Sites in the rural areas, subject to Green Belt policy. The wider Fort Halstead site is identified within the Core Strategy as a Major Developed Site. Policy SP8 states that the sustainable development of the district's economy will be supported by the retention, intensification and regeneration of existing business areas primarily at Major Developed Sites in rural areas, subject to Green Belt policy. Sites used for business purposes will be retained in business use unless it can be demonstrated that there is no reasonable prospect of their take up or continued use for business purposes.

- 7.5 The ADMP was adopted in 2015. Subsequently Policy EMP2 (Major Developed Sites in the Green Belt) established the site as being an important employment generating site and Policy EMP3 (Redevelopment of Fort Halstead) allocated the Fort Halstead site for mixed-use redevelopment. In summary, policy identified the site as being a major developed site in the Green Belt (the ADMP did not review Green Belt boundaries) which could be redeveloped for a range of employment uses (including research and development, offices, workshops) to generate at least the number of jobs on site when DSTL announced it would be vacating (which was 1,200 jobs); and then up to 450 residential units as part of the mixed-use scheme, possibly also a hotel and other supporting community infrastructure. The 2015 OPP was approved against this policy context and this established the principle of the redevelopment of the site, including the consolidation of QinetiQ's functions and formation of the QinetiQ enclave. The retention of QinetiQ on the Fort Halstead site was accepted and welcomed by the Council. The current undetermined 2019 hybrid planning application includes proposals for the formation of QinetiQ's enclave and reflects the extant policy background and the 2015 OPP.
- 7.6 As set out in Section 6, the Council is in the process of preparing a new Local Plan. Policy ST2 of the Submission Version of the Local Plan continues to allocate Fort Halstead for mixed-use development including for 750 homes (450 of which were already granted planning permission as part of the 2015 outline application). Furthermore, the Plan proposed for the release of the Fort Halstead site from the Green Belt.
- 7.7 Chapter 6 of the NPPF sets out the Government's approach to build a strong, competitive economy and seeks to provide a planning framework to support businesses develop and adapt, with an emphasis on supporting innovation.

Assessment

- 7.8 The principle of employment use and retention of QinetiQ on site to be consolidated within a proposed enclave has clearly been established and is not in dispute.
- 7.9 The site is currently in use for employment purposes with a mix of Use Class E, B2 and B8 employment uses located across the site. It is important to emphasise that much of QinetiQ's activities are already taking place within the area of the enclave, although some parts of QinetiQ's operations will be relocating into the enclave from other parts of Fort Halstead.
- 7.10 As existing, there is approximately 9,904 sqm of employment space located within the new QinetiQ site boundary. As part of the proposals, only an additional 423.46 sqm of employment floorspace is proposed. A number of existing buildings on site are no longer required and approximately 2,332.24 sqm of floorspace is proposed to be demolished. Therefore, a total of 7,995.16 (GIA) of QinetiQ employment floorspace will remain on site. The 2019 outline application seeks approval for 27,773 sqm (GEA) of employment space across the wider Fort Halstead site. Approximately 6,016 sqm (GEA) of this was considered to comprise the retained QinetiQ buildings. Further to the March 2021 amendments submitted in relation to the wider application regarding the additional QinetiQ buildings to be retained and demolished, this figure increased slightly to 7,530.09sqm. The additional employment floorspace required by QinetiQ as set out within this planning

application will be included within the total 27,773sqm of employment space to be provided across the wider Fort Halstead site.

- 7.11 The proposed refurbishment of the existing buildings, erection of the new reception building, erection of the security perimeter fence are all considered essential to QinetiQ's ability to continue to operate on the site and be responsible for security of the enclave when DSTL vacate from the site.
- 7.12 The proposals do not include an increase in the number of QinetiQ employees, but it does allow for them to stay on site. The proposals will provide the same number of jobs as identified within the 2019 wider outline application which is circa. 200 employees across the QinetiQ site.
- 7.13 There is longstanding support for the employment led development of the site within Policy EMP3 of the adopted Local Plan and Policy ST2 of the previously Emerging Local Plan. Overall, the proposals seek to facilitate the retention of the existing employer, QinetiQ, on site and will help maintain up to 200 existing jobs. The creation of the QinetiQ enclave will assist in retaining a key employer within the Sevenoaks district and fulfilling the aspirations for the comprehensive redevelopment of the wider Fort Halstead site.

Principle of Development in the Green Belt and Impact on Openness

Policy Context

- 7.14 The key paragraphs of the NPPF relevant to the proposals are 134, 143, 144 and 145. Paragraph 145g notes exceptions to development in the Green Belt being considered 'inappropriate' including:
- 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.
- 7.15 Within the Submission Local Plan, Draft Policy ST1 (A Balanced Strategy for Growth in a Constrained District) sets out that the re-use of previously developed brownfield land, including land in the Green Belt will be encouraged. The site, and the wider Fort Halstead site was identified for removal from the Green Belt within the Submission Local Plan.

Assessment

- 7.16 Despite the site being identified for release from the Green Belt within the previously emerging Local Plan, as the adoption of the Plan has been delayed, the site continues to be located within the Green Belt.

- 7.17 As highlighted, development plan policies, the 2015 OPP and soon to be determined hybrid planning application have established the need for the creation of the QinetiQ enclave within the Fort Halstead site in the Green Belt.
- 7.18 It is necessary to re-apply development plan policies and national planning policy guidance in relation to Green Belt to assess whether or not the proposals are appropriate development. The following analysis demonstrates that they are.
- 7.19 Existing buildings within the area of the enclave extend to a total of 9,903.94 sqm of floorspace. In terms of new floorspace, approximately 423.46 sqm of floorspace is proposed to be provided as part of the proposals. The proposed new floorspace details are shown below:

Proposed new buildings	Area (m2) - GIA Floor Space
X78 Internal (wet) Plantroom	28.07
X83 Reception Building	93.29
X51.2 Magazine	6.48
X24.1 Magazine	5.1
X51 - 6 No. ISO Containers	82.06
Guard Kiosk	2.85
HV DNO GRP kiosk	12.96
HV Intake GRP building	64.04
Substation SS1 - LV switch room (GRP enclosure)	36.98
Substation SS2 - LV switch room (GRP enclosure)	24.94
Substation SS3 - LV switch room (GRP enclosure)	24.94
Substation SS4 - LV switch room (GRP enclosure)	24.94
LV Switchroom - SS3/LV2 (GRP enclosure)	16.81

- 7.20 Approximately 2,332.24 sqm of the existing floorspace will be demolished, resulting in the total floorspace of the enclave amounting to 7,995.16 sqm. This will result in an overall reduction of 1,908.78 sqm of floorspace across the proposed QinetiQ enclave. The extant OPP was considered to be appropriate development in the Green Belt.
- 7.21 The proposed development is considered to be appropriate development in the Green Belt because it relates to the development of previously developed land which would be in the same use and because the proposals would not having a greater impact on the openness of the Green Belt than the existing development, thus the requirements of para 145 g) of the NPPF are satisfied. The proposed development has no greater impact on than that granted by the 2015 OPP for the following reasons:
- The maximum three-storey or 16m QinetiQ headquarters building situated to the northwest of the site along Crow Drive has been removed. The OPP officer report recognises that this is perhaps the most significant sized building proposed as part of the OPP scheme at circa 3,000 sqm. The officer report

concludes that with good design and positioning, the overall impact on the Green Belt on that particular part of the development would be neutral.

- Applying this principle, it should be noted that the maximum existing building height is two storeys. The new floorspace proposed as part of the application will not exceed single storey in height. Overall a reduction in height is proposed in comparison to the OPP, thus the impact on the openness of the Green Belt will be further improved.
- As outlined above, the new floorspace proposed totals just 423.46 sqm, a significant reduction to the 3,000 sqm of new enclave floorspace proposed as part of the OPP. The largest building proposed as part of the consolidation of the enclave is the new reception building known as X83 which measures 93.29 sqm. The current reception building operated by DSTL is provided outside of the proposed enclave and QinetiQ require their own stand-alone reception.
- Proposals for a 2.4m high fence topped with strands of barbed wire (total of 3m) was previously approved as part of the OPP. The proposed fencing is broadly the same size as the approved OPP fencing, albeit slightly reduced to 2.9m, and for most parts, follows a similar alignment. Informal landscaping will be provided to the front of this to provide a stronger screen to Crow Drive. The proposed fence forms a fundamental element of QinetiQ's ability to remain on site in order to provide the necessary level of security.

7.22 It is clear the proposed development will not have a greater impact on the openness of the existing development and satisfied the requirements of paragraph 145 g) of the NPPF. Furthermore, it is a material consideration that there is a clear policy support for the redevelopment of the site including the retention of QinetiQ as an established employment use. The previously Emerging Local Plan sought to strengthen this support for the redevelopment of the site through the proposed release of the site from the Green Belt.

Principle of Development in the AONB

Policy Context

7.23 The key paragraph of the NPPF relevant to the proposals is paragraph 172.

7.24 Policy LO8 (The Countryside and Rural Economy) of the Core Strategy seeks to conserve and enhance the Kent Downs AONB and its setting.

7.25 Policy EN5 (Landscape) of the ADMP assigns the Kent Downs AONB and its setting the highest status of protection in relation to landscape and scenic beauty. The policy requires that development proposals are appropriate in design and scale and that the relevant AONB Management Plan is considered. The key objectives of the Management Plan are to support sustainable development, protect and enhance landscape character/biodiversity/woodland/heritage and support communities and access.

Assessment

- 7.26 The site falls within the Kent Downs AONB
- 7.27 The Kent Downs has a dramatic and diverse topography, creating a unique landscape pattern. These features comprise scarps of chalk and greensand; expansive open plateaux; hidden dry valleys; steep-sided river valleys; and dramatic white cliffs and foreshore. Woodland is a key feature of the Kent Downs and frames the upper slopes and plateaux tops. Over half of the woodland sites are ancient. Semi-natural chalk grassland is also a key feature of the AONB.
- 7.28 The site sits at the top of the scarp overlooking Sevenoaks. Special characteristics of the AONB which can be found at the site include the south facing scarp of chalk grassland (unimproved calcareous) as well as ancient semi-natural woodland.
- 7.29 It is unusual that there is already a developed employment site of this scale in the AONB. This site began with The Fort in the late 1890s and has expanded extensively since that time as part of defence plans before, during and after both World Wars. After World War II 59 buildings are associated with the role of the site for atomic research and this would have involved the erection of further buildings. Further building took place in the 1960s with major redevelopment taking place in the 1970s and early 1980s.
- 7.30 In contrast, the Kent Downs AONB was designated in July 1968 under the National Parks and Access to the Countryside Act 1949. It covers 339 square miles from Surrey / Greater London to the Strait of Dover, covering some 23% of the total area of Kent. At the time of this designation this site was already well established as a secure defence and research facility including a significant amount of development.
- 7.31 The AONB report prepared by LDA Design and submitted in support of the hybrid application sets out the contribution of Fort Halstead to the AONB. Fort Halstead, despite its location on the ridge of the Kent Downs escarpment, is not overly apparent within the landscape. The perimeter woodland and vegetation surrounding the Site forms an effective screen to many potential views. From the north and east, views are restricted by vegetation and flatter topography of the dip slope of the escarpment, limiting views to taller elements such as Building N2 and the boiler house chimneys (Building S2).
- 7.32 From the south, the scarp face of the escarpment is prominent, with views of the existing QinetiQ perimeter security fence and building X40 beyond the perimeter vegetation possible, although all other buildings and structures within the Site are screened from view. The new floorspace proposed as part of the application proposals is minimal and situated primarily to the north of the site close to Crow Drive. All proposed new buildings will be at single storey height; this is a reduction to the three-storey headquarters office building proposed in the western corner of the site which was approved as part of the OPP and is consistent with the existing building heights on site. The proposed development will be within the same developed area as the existing and will sit entirely within previously developed land. Along the southern site boundary, the existing fence will remain therefore there will be no discernible change to the character and views from the AONB

outside of the application site. Furthermore, there will be an overall net reduction in floorspace across the proposed enclave

- 7.33 Whilst it is inevitable that a number of trees will be lost as a result of the proposed development, it is proposed that this will be mitigated by a tree replanting scheme comprising three new trees to be planted for every one tree lost. The ancient woodland will be protected, and no trees will be lost from this area. The Arboricultural Method Statement sets out the mitigation measures to be taken to protect all retained trees including details of protective barriers which will remain in place until completion of the construction phase of the proposed development. The route of the proposed security fence which is located within the area of ancient woodland will utilise an existing footpath and arboricultural advice will be taken to ensure the most sensitive approach is utilised. Again, the woodland buffer in this area will screen the proposed fence and buildings on site from view.
- 7.34 For the purposes of the validation of the planning application, the site is considered to be a major development as the site area of the new enclave is 15.8ha in size. A proposed site area in excess of 1ha is considered major development. However, the proposals seek to provide less than 500 sqm of new floorspace which is concentrated primarily towards the north of the site and lead to an overall reduction in built development through the demolition of some 1,908.78sqm of floorspace. The largest new building proposed as part of the proposals is 93.29 sqm which is modest. Although it is questionable whether or not the proposals are in fact major development because these result in a reduction in built floorspace is questionable, nevertheless for the purposes of this submission, the relevant tests in paragraph 172 of the NPPF are applied below.
- 7.35 Nonetheless, the tests of paragraph 172 have been addressed:

- **The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy:** DSTL has confirmed its intention to vacate the site by 2023, and is well advanced in the process of moving its operations to Portsdown West and Porton Down. QinetiQ intends to consolidate and retain operations within the proposed enclave, post-DSTL's departure. The development is therefore necessary to allow QinetiQ to continue to maintain its existing operations on site. QinetiQ have a range of unique security requirements which are essential to enable their continued operation at Fort Halstead.

In support of this application, QinetiQ have submitted a formal letter clarifying their operational requirements. The new secure fence line is required by QinetiQ in order to demonstrate to the satisfaction of the Health and Safety Executive that appropriate security measures are in place to ensure the safety and security of the storage of ordnance, munitions, and explosives. Furthermore, to meet the mandatory physical security requirements of HMG Security Policy framework for the storage, management and protection of classified assets and information, an appropriate security rated fence must be in place as part of a layered protective approach to security.

New access roads, reception building and car parking are also essential to QinetiQ's continued operation at the site as these are all currently provided outside of the proposed enclave and need to be relocated. New power, water, IT and heating infrastructure is required to remove reliance on existing infrastructure

located outside of the enclave. New substations and external plant areas for mechanical and electrical equipment will enable the replacement of the heavy oil-filled district heating system which provides heating to buildings within the enclave from a boiler house outside of the enclave. This will include the adoption of localised Air Source Heat Pump (ASHP) heating systems which represent low and zero carbon heating technology.

QinetiQ is identified in the ADMP as a major employer. Fort Halstead as a whole is a Major Developed Employment Site. It is clear that the development proposals would have a beneficial impact on the local economy because it would allow an important local employer to remain on site and for investment in buildings and support infrastructure to enable QinetiQ to remain on site. There is a clear need for the development and refusing permission would harm the local economy.

- **The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way:** Fort Halstead is already an existing major developed site within the AONB which is occupied by QinetiQ. Sevenoaks is predominantly rural in character, with 93% of the District designated as Green Belt. The quality of the landscape is a distinctive feature of the area. The national significance of the landscape is recognised by the inclusion of 60% of the District within either the Kent Downs (to the North) or High Weald (to the South) AONBs. The Site is allocated in the Core Strategy and ADMP for development for a mixed-use employment led scheme and the outline planning application already establishes the principle of the creation of the proposed QinetiQ enclave. There is no scope to invest outside of Fort Halstead because to do so would take QinetiQ away from its established base and harm the local economy.
- **Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated:** The overall effect on the environment will be positive with a reduction in built floorspace and additional landscaping will be planted along the frontage to Crow Drive in the form of a new low hedge row using native species. The fence would be coloured dark green with a matt finish to blend with the surrounding landscaping. Key landscape features within the site, such as ancient woodland and areas of chalk, semi-improved unimproved calcareous grassland and ancient woodland will be retained and managed through an appropriate management regime. New native trees will be planted to mitigate against those felled on a 3:1 ratio. A new heating system will be installed which will include the adoption of ASHPs which represent low and zero carbon technology. Furthermore, the removal of the tall chimney on building X78 will also provide enhancement to the landscape character and replace a feature on the landscape which is visible from Sevenoaks to the south.

7.36 It is necessary to redevelop the site to provide a secure enclave to ensure QinetiQ's continued use of the site following DSTL's departure from Fort Halstead. QinetiQ has confirmed it is only possible for them to remain on the site if it is positively planned for to enable the business to remain on the site.

7.37 The proposals would clearly be in the public interest and whilst changing the character of the existing site, the principle of development has previously been granted permission, and the proposals would seek to conserve and enhance the character and setting of the AONB through a reduction in floor area and an increase in

landscaping. The proposals are therefore in accordance with the policies LO8 and EN5 of the development plan and paragraph 172 of the NPPF.

Transport and Highways

Policy Context

- 7.38 Paragraph 111 of the NPPF requires that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Paragraph 109 considers that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 7.39 Policy T1 (Mitigating Travel Impact) of the ADMP states that new developments will be required to mitigate any adverse travel impacts, including their impact on congestion and safety, environmental impact, such as noise and tranquillity, pollution and impact on amenity and health. This may mean ensuring adequate provision is made for integrated and improved transport infrastructure or other appropriate mitigation measures, through direct improvements and/or developer contributions.
- 7.40 Policy T2 (Vehicle Parking) of the ADMP requires vehicle parking provision, including cycle parking, in non-residential development to be in accordance with advice by Kent County Council. However, the policy does contain a degree of flexibility and allows for departure from the maximum and minimum standards in order to take account of specific local circumstances.
- 7.41 Policy T3 (Provision of Electrical Vehicle Charging Points) of the ADMP states that for all major non-residential development proposals, the applicant should set out within their Transport Assessment a scheme for the inclusion of electric vehicle charging infrastructure. In non-residential developments where it is not appropriate to provide electric vehicle charging points, new development should be designed to include the electrical infrastructure in order to minimise the cost and disturbance of retrofitting at a later date.
- 7.42 Site Allocation Policy EMP3 (Redevelopment of Fort Halstead) states that the proposals must be accompanied by a Travel Plan and confirm by way of a Transport Assessment that the development would not have an unacceptable adverse impact on local and strategic road networks.

Assessment

- 7.43 A total of 152 car parking spaces are proposed within the enclave and 29 of the spaces already exist.
- 7.44 A new visitor parking area comprising 9no. parking spaces is proposed to the north of the site to the east of the access. Two of these parking spaces will be allocated as wheelchair parking. Approximately 6no. existing car parking spaces are located adjacent to X83. A further existing 6no. car parking bays are located adjacent to X60. 6no. new wheelchair parking spaces are proposed to the west of X78.

- 7.45 A new staff car park is proposed in the northwest of the site, close to the Crow Road boundary. Within the car park 125no. parking bays are proposed, with 17no. of these utilising existing parking areas. The level of parking proposed accords with the Kent SPG4 parking standards, as this is less than the maximum permissible parking standard for the entire enclave.
- 7.46 Approximately 3no. 22kw EV charging stands are also proposed, each with 2 outlet sockets providing 6no. EV charging spaces. These facilities would provide a typical EV with charge in 1 ½ to 2 hours which is twice the rate of a typical residential charger, hence fewer charge points should be necessary to provide the same level of service.
- 7.47 In line with the Kent cycle parking standards, there will be 48 cycle parking spaces proposed for staff and visitors. The visitor parking spaces are to be located by building X83 and staff parking to be located by building X78.
- 7.48 The Transport Assessment sets out the details of the site's proposed access arrangements. The access for the QinetiQ site will be via a small island/roundabout off Crow Drive, as originally suggested in the hybrid planning application. There will be a gate on the access which will only be in operation out of hours of the site, to ensure no unauthorised access. Once inside the site, there will be one lane in each direction, with a gate and reception on the site just west of the Crow Drive access. This gate will be in operation during working hours and will be manned.
- 7.49 There is the potential that the Crow Drive improvement works as part of the hybrid planning application would not be in place at the time the enclave redevelopment comes into full use, therefore a priority junction is proposed to provide satisfactory access in the interim period.
- 7.50 As the proposed development will not change the number of employees at the QinetiQ site, it is considered that the trip generation data provided within the previous Transport Assessment submitted as part of the 2019 hybrid planning application and which was agreed with Kent County Council should be applied to these proposals. As the total number of existing QinetiQ staff were included within the agreed Transport Assessment and there would be no increase in QinetiQ staff numbers from the proposed development, there is no difference in trip generation or traffic impacts. All of the journeys made by QinetiQ staff are existing trips that are already on the network.
- 7.51 A detailed Travel Plan, in accordance with the hybrid planning application, has been prepared in support of this planning application. This will aim to encourage sustainable forms of transport and minimise reliance on single occupancy car journeys and will work within the wider site Framework Travel Plan.
- 7.52 The proposed development complies with policies T1, T2, T3 and EMP3 of the development plan and the submitted material demonstrates that having regard to the guidance in paragraph 109 of the NPPF, planning permission should be granted.

Trees and Biodiversity

Policy Context

- 7.53 Chapter 15 of the NPPF sets out the Government's approach to conserving and enhancing the natural environment. Paragraph 170 sets out that planning decisions should contribute to and enhance the natural and local environment. Paragraph 175 requires that planning permission be refused if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for. Development resulting the loss of deterioration of irreplaceable habitats including ancient woodland should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- 7.54 Policy SP11 (Biodiversity) of the Core Strategy seeks to conserve and seek opportunities for enhancement to ensure no net loss of biodiversity.
- 7.55 Policy EN5 (Landscape) of the ADMP primarily concerns landscape within the Kent Down AONB. The policy awards the AONB the highest level of protection and requires that development proposals conserve and enhance the character of the landscape.
- 7.56 Site Allocation Policy EMP3 (Redevelopment of Fort Halstead) states that proposals should include the protection, enhancement and management of biodiversity.

Assessment

- 7.57 A suite of ecological and arboricultural reports have been submitted in support of the planning application.
- 7.58 Designated Ancient Woodland is located along the southwest border of the site. Natural England guidance states that a buffer of 15m between ancient woodland and development is advised. The proposals have been developed with this as a key consideration and seek to preserve all ancient woodland in accordance with the guidance in the NPPF.
- 7.59 The proposed perimeter fence line slightly abuts the 15m ancient woodland buffer zone in the southwest corner of the site. However, it should be noted that all other proposed works fall outside of this 15m buffer zone. Furthermore, the fence line which formed part of the approved 2015 outline planning application included an almost identical fence line in this location. Due to QinetiQ's security requirements the proposed fence line is considered essential to their continued operation at the site. Given there will no increase in employee numbers on site, no significant increases in recreational disturbance of the designated ancient woodland within and adjacent to the site are anticipated. However, the submitted Ecological Mitigation Strategy (EMS) and Landscape and Ecological Management Plan (LEMP) sets out the preventative measures that should be taken in order to minimise the potential impact of the construction phase of the development on the ancient woodland as well as opportunities for enhancement.

- 7.60 In addition to the designated ancient woodland, the site is subject to a sitewide Tree Protection Order (TPO). The proposed development will ensure the retention of the vast majority of existing trees across the site however unfortunately 33 trees and the partial removal of trees forming 2 groups will be required to be removed in order to accommodate the development proposals. Of these 33 trees, 4 are Category U trees and are considered unsuitable for retention and removal of these trees would be required irrespective of the proposed development due to their poor condition. Nine individual trees identified for removal were considered to be of high retention value in the arboricultural survey. Fourteen individual trees identified for removal and a group identified for partial removal are of moderate retention value. Although the loss of high and moderate quality trees should generally be avoided, the extensive tree cover across the site would limit the impact of these trees and as such, sufficient high-quality tree planting will provide partial mitigation alongside management of the existing trees.
- 7.61 The remaining trees to be removed are considered to be of low retention value and the proposed removal of these trees should not be a notable consideration as new tree planting of higher quality trees, more suited to the new development will make a last contribution to the visual amenity value and canopy coverage of the site. No ancient woodland trees will be lost as part of the proposals.
- 7.62 In order to mitigate this loss, trees will be replaced at a ratio of 3 trees planted per 1 tree lost to assist in the further enhancement of the biodiversity value of the site. The species planted will reflect those already present on site, with the following species proposed: English Oak, Sessile Oak, Beech, Wild Cherry, Yew, Hornbeam, Silver Birch, Crab Apple and Rowan. The majority of new tree planting would be located to the north of the site, close to the proposed reception building due to this being the predominate location of removed trees. In line with the recommendations on the LEMP and EMS, the newly planted trees will be native species appropriate to this part of Kent and the AONB. An Arboricultural Method Statement has been prepared which details the specific measures to be adopted to ensure the protection of the retained trees during the construction phase of the project. As previously discussed, the development and creation of the secured enclave is essential for QinetiQ to continue its operations on site. This is considered to be a national consideration and key to the local Sevenoaks economy. Therefore, whilst the loss of trees is unfortunate, it is considered that exceptional reasons support its loss and a suitable compensation strategy exists.
- 7.63 A Construction Environmental Management Plan (CEMP) has been prepared in support of the planning application. The document details practical measures that will be implemented to ensure that biodiversity features on site are protected at all times throughout the construction process. Measures are proposed to consider the protection of trees and their root protection areas during site preparation and construction of development in accordance with the relevant British Standards.
- 7.64 A range of ecological surveys have been completed across the entire Fort Halstead site between 2006-2013 and 2018 with further updated surveys in 2020. A Phase 1 Habitat Survey was completed in August 2020 as part of the Preliminary Ecological Appraisal (PEA) and noted the habitats and notable species present on site. A full suite of targeted surveys of the site was subsequently conducted. This included a Preliminary Bat Roost

Assessment (PBA), Badger Survey, Dusk Emergence and Dawn Re-Entry Bat Survey and Winter Hibernation Bat Survey.

- 7.65 The targeted Badger Survey identified five badger setts within the site boundary comprising one main sett, one annex sett, one subsidiary sett and two outlier setts. Of these setts, four showed signs of recent use. One additional subsidiary sett was identified outside of, but within 30m, of the site boundary. The Badger Survey prepared by Middlemarch Environmental concludes that the proposed fence lines will all be located in excess of 25m from the badger setts on site and as such, no sett disturbance or damage is anticipated. Setts 2,3,4,5 and 6 all lie within an area which is to be fenced off from the wider Fort Halstead site. Given that sett 3 is a main sett, suitable tunnels will be provided underneath the fencing to ensure the badgers can continue to move through the wider site. The increase in human activity during the construction phase and the implementation of features that will fragment the existing commuting and foraging habitat has the potential to impact badgers on site. Therefore, badger tunnels will be installed under main routes throughout the site, along with associated guide fencing.
- 7.66 The targeted PBA of the buildings within the site boundary was completed over two site visits in August 2020. A total of 36 buildings were classed as having high potential to support roosting bats and 26 buildings were classed as having low potential to support roosting bats. Building X78 was identified as having high potential to support roosting bats. The submitted Bat Protection Strategy sets out the mitigation measures required to prevent any disturbance to bats or bat roosts identified. Furthermore, building X9 was found to contain a bat roost. As bat roosts have been identified, prior to any works commencing, a Natural England Development License would be obtained. Bat boxes will be installed to provide roosting habitat and the lighting will be kept to a minimum.
- 7.67 The proposed development will result in a biodiversity net gain, delivering an uplift of 8.91 biodiversity units, a site increase in biodiversity value of 6.34% over the current habitat value. Management and monitoring of habitats will be completed in accordance with the LEMP to ensure this proposed net gain is achieved.
- 7.68 It is clear that the proposals satisfy the requirements of policies SP11, EN5 and EMP3 of the development plan and paragraphs 170 and 175 of the NPPF.

Ground Conditions

Policy Context

- 7.69 Chapter 15 of the NPPF sets out the Government's approach to conserving and enhancing the natural environment. Paragraph 178 states that planning decisions should ensure that: a site is suitable for its proposed use taking account of ground conditions and any risks arising from contamination; after remediation, as a minimum, land should not be capable of being determined as contamination land; and adequate site investigation information is available.

- 7.70 Paragraph 179 goes on to state that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

Assessment

- 7.71 A Geo-Environmental Assessment has been submitted in support of the planning application. The assessment details the ground conditions as proven by the investigation undertaken at the site.
- 7.72 In terms of contamination present on site, asbestos has been identified within the Made Ground and shallow natural soils at locations across the site. No significant contamination risks were identified in respects to plant growth, controlled waters, ground gases or vapours and the site is not in a Radon Affected Area. Following the ground investigation works undertaken to date, some further works will be required such as a pre-demolition asbestos survey and further site investigations to areas that have not yet been accessible.
- 7.73 The proposed remediation strategy will ensure that contamination issues are addressed and dealt with appropriately throughout the development.
- 7.74 The proposed development complies with the guidance in the NPPF at paragraph 178.

Flood Risk and Drainage

Policy Context

- 7.75 Chapter 14 of the NPPF sets out the Government's approach to meeting the challenge of climate change, flooding and coastal change. Paragraph 155 sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 7.76 Paragraph 165 states that major development should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

Assessment

- 7.77 The site is located within Flood Zone 1, meaning there is less than 0.1% annual risk of flooding.
- 7.78 A Drainage Strategy has been prepared by BakerHicks and is submitted in support of the planning application. The new surface water management system will be designed to drain the proposed new works effectively without putting pressure on existing surface water systems and allows for the interception of hydrocarbons from roads and parking areas.
- 7.79 The proposed surface water drainage strategy is to direct run off from the proposed new works to deep bore soakaways, these will be newly installed deep bore soakaways. For the main area of car parking, the infiltration basin located within the parking area will serve the new access road, the 108 standard parking spaces and the

six disabled parking spaces. For the access road to the north and the visitors car parking there will be a second location for the disposal of surface water.

- 7.80 Although alternatives to soakaways have been considered, these would result in extensive drainage systems to convey surface water away from the site or towards the southern part of the QinetiQ enclave. The provision of soakaways is similar to the existing surface water drainage design along the north side of the QinetiQ enclave which allows surface water to be disposed locally.
- 7.81 The proposed development complies with the guidance in the NPPF at paragraph 165.

Heritage and the Historic Environment

Policy Context

- 7.82 Chapter 16 of the NPPF sets out the Government's approach to conserving and enhancing the historic environment.
- 7.83 For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 190, which requires Councils to take this assessment into account when considering applications.
- 7.84 In determining planning applications which impact heritage assets and their setting, under paragraph 192 of the NPPF, planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them into viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make, including their economic vitality and the desirability of new development making a positive contribution to local character and distinctiveness. When considering the impact of the development on designated assets, weight should be given to the asset's conservation.
- 7.85 Under 'Considering potential impacts' the NPPF emphasises that 'great weight' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets. Where less than substantial harm is identified, paragraph 196 requires this harm to be weighed against the public benefits of the proposed development.
- 7.86 Policy SP1 (Design of New Development and Conservation) of the Core Strategy sets out that the District's heritage assets and their settings, including listed buildings, conservation areas, archaeological remains, ancient monuments, historic parks and gardens, historic buildings, landscapes and outstanding views will be protected and enhanced.
- 7.87 Policy EN4 (Heritage Assets) of the ADMP sets out that proposals that affect a heritage asset, or its setting, will be permitted where the development conserves or enhances the character, appearance and setting of the

asset. Applications will be assessed with reference to the historic and/or architectural significance of the asset, the prominence of its location and setting and the historic/architectural significance of any elements to be lost or replaced. Where the application is located within, or would affect, an area or suspected area of archaeological importance an archaeological assessment must be provided to ensure that provision is made for the preservation of important archaeological remains/findings.

- 7.88 Site Allocation Policy ENP3 (Redevelopment of Fort Halstead) states that proposals should integrate the Scheduled Ancient Monument and listed buildings into the development with improved access and setting.

Assessment

- 7.89 The site is situated to the west of a Scheduled Ancient Monument (known as The Fort), separated by an area of hardstanding.
- 7.90 The site does not comprise any listed buildings. There are three listed buildings located within the Fort. This includes buildings F16 and F17 (Grade II* listed) and building F11 (Grade II listed). Building Q14 (Grade II listed) is located outside of the Fort to the northeast of the site.
- 7.91 The proposed perimeter fence will pass close to the western edge of the Fort. The new fence will be visible from the Fort and is expected to be visible in filtered views from the ramparts, beyond the tree cover. Although the proposed fence will provide a less permeable barrier than the existing chain link fence, it will have a limited impact on the visual relationship between the Fort and the site with the existing buildings and planting already obscuring the majority of views from the Fort into the site. It is considered that the fence will therefore reinforce the enclosed setting of the Scheduled Monument in this location.
- 7.92 The officer report for the approved 2015 outline application makes specific reference to the fencing at paragraph 441 stating: *"A high security fence is proposed which will also reflect the historic and evidential values of the site and have a neutral impact on the Scheduled Ancient Monument and its setting."* A Built Heritage Statement has been prepared and submitted in support of this planning application. As set out above, the conclusions of the 2015 officer report are endorsed within the Statement as it is considered that the fence will reinforce the enclosed setting of the Fort.
- 7.93 The submitted Built Heritage Statement confirms that whilst the proposals will represent some minor change to the setting of the Scheduled Ancient Monument and the four listed buildings situated in close proximity to the site boundary, the nature of the proposed works mean that these changes will have no impact on the significance on the heritage assets. The proposals will also have no impact on the non-designated heritage assets identified within the site.
- 7.94 Overall, the proposed development will conserve the significance and preserve the special architectural and historic interest of the heritage assets. The proposals therefore accord with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national and local planning policy (SP1 and EN4) relating to heritage assets.

7.95 The Archaeological Assessment concludes that the site has low potential for archaeological remains however given the slight overlap with the boundary of the Scheduled Ancient Monument, the proposed works may require Scheduled Monument Consent. However, this would need to be agreed in consultations with Heritage Conservation and Historic England.

8 SUMMARY AND CONCLUSIONS

- 8.1 This planning statement has been prepared to support a full planning application for the creation of a new QinetiQ enclave, delivering a secure, consolidated employment site to allow for the continuation of QinetiQ's operations at Fort Halstead.
- 8.2 The site is a Major Developed Site in the Green Belt, it is a major employer in the district and it is an important employment generating site. It is allocated for employment-led development (Policy EMP3).
- 8.3 The development that is included within this application is entirely consistent with the development proposed for this area in the approved 2015 OPP and the undetermined 2019 hybrid planning application. Although the 2019 application is nearing the point of determination, it is a hybrid application and it does not seek detailed approval of QinetiQ's enclave. Given the works to form QinetiQ's secure enclave have to be completed by the end of 2022 and will take in order of a year to complete, QinetiQ has worked up the detailed design of the works for the enclave, thereby enabling the enclave and its security to be operational before DSTL's departure at the start of 2023.
- 8.4 The application proposals comply with the guidance in paragraph 4.18 as the proposals are employment led and provide for the retention of QinetiQ, are deliverable and works would start in 2021 and be completed in 2022, are comprehensive and complement the wider proposals for Fort Halstead, comply with sustainable development principles and result in no increase in the impact on the openness of the Green Belt.
- 8.5 The proposals are compliant with relevant policies of the development plan, in particular EMP3, GB8, LO8, EN5, T1-3 and SP11.
- 8.6 In respect of the Green Belt and AONB, the proposals comply with the guidance in paragraphs 143-145 and 172 of the NPPF.
- 8.7 It is clear that planning permission should be granted for the proposals.
- 8.8 The technical reports submitted in support of the application contain detailed information such that it is the applicant's contention that the grant of planning permission should not be subject to pre-commencement conditions requiring submission of further material that would delay the construction of the enclave.

Appendix 1: QinetiQ Letter

QinetiQ,
Fort Halstead,
Sevenoaks,
Kent
TN14 7BP

12/05/2021

To whom it may concern,

QinetiQ intends to remain at the Fort Halstead site for the long term and this is entirely consistent with the wider economic policy objectives of Sevenoaks District Council.

QinetiQ undertakes activities at the Fort Halstead site to provide expert advice on the assurance of the safety and suitability of ordnance, munitions and explosives for service to UK MOD and original equipment manufacturers – these activities are important for national defence and security.

QinetiQ employs in the order of 150 members of staff at the Fort Halstead site, with over 70% of these in highly skilled science and engineering roles, and is forecasting modest growth in employment numbers (c. 10% - 15%) over the next five to ten years.

QinetiQ has been working closely with CBRE, planning consultants for Merseyside Pension Fund, over many months to ensure that the requirements for QinetiQ to consolidate its operations into the area known as the X enclave are appropriately reflected in the outline application for the redevelopment of the Fort Halstead site (ref: 19/05000/HYB).

QinetiQ is now bringing forward a planning application reflecting the detail of these requirements such as:

- New security fence line, required for two key reasons. Firstly, in order for QinetiQ to maintain the extant licence from the Health & Safety Executive, appropriate physical security measures need to be in place to ensure the safety and security of the storage of ordnance, munitions and explosives. Secondly, to meet the mandatory physical security requirements of HMG Security Policy Framework for the storage, management and protection of classified assets and information, an appropriate security rated fence needs to be in place as part of a layered protective security posture. The proposed fence line takes account of the local topography and environmental factors for the area, whilst ensuring public safety and security, which is of paramount importance and includes a 1 metre buffer zone to ensure the integrity of the fence can be easily checked, any potential assailants are not offered cover from view and to ensure no vegetation/planting can be used to scale the fence.
- New roadways, security reception building and car parking at the site frontage – to re-provide access and car parking which is currently provided outside the X enclave as part of the wider site provisions.
- New power, water, IT and heating infrastructure – to remove reliance on existing infrastructure outside the X enclave, including new plant areas for mechanical and electrical equipment to enable the replacement of the heavy oil-fired district heating system which provides heating to buildings within the X enclave from a boiler house outside the X enclave – this includes the adoption of localised air source heat pump (ASHP) heating systems which represent LZC heating technology.

Yours sincerely,



Graham Foster,
QinetiQ Head of Site, Fort Halstead