

4.1 19/05000/HYB Date Expires: 30.09.2021

PROPOSAL: 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.

LOCATION: Fort Halstead, Crow Drive, Halstead Sevenoaks TN14 7BU

WARD(S): Halstead, Knockholt & Badgers Mount / Dunton Green and Riverhead / Brasted, Sundridge and Chevening.

ITEM FOR DECISION

This application has been referred to Development Control Committee at the discretion of the Chief Planning Officer, as the development is of a significant and sensitive nature.

RECOMMENDATION A: That planning permission be GRANTED subject to:

- a) The conditions set out below, subject to any minor changes to wording being agreed in writing by the Chief Officer for Planning and Regulatory Services, and
- b) A satisfactory legal agreement made under section 106 of the Town and Country Planning Act 1990 (as amended) being completed no later than 31 October 2021, unless in accordance with a new timescale otherwise agreed in writing by the Chief Officer for Planning and Regulatory Services.

Section 106 Agreement

The Section 106 Agreement shall include the following requirements:

- 20% affordable housing with a mix of 65% for Social Rent/ Affordable Rent and 35% for Intermediate housing, plus early and late review mechanisms;
 - Safeguarding of land for a school, to revert to employment use if not required;
 - Ecological mitigation works and management of habitats;

- Provision, protection and management of all open spaces and the green infrastructure
- Safeguards for heritage assets including provision of a Heritage Management Plan and delivery of a Historic Interpretation Centre and a Heritage Trail;
- Management and maintenance plans for the open spaces within the site;
- Highways and transport improvements including works under a Section 278 agreement as required, to include :
 - Access junction improvements including new roundabout to Polhill access to include pedestrian and cycling infrastructure and alterations to Star Hill Road and its access to include enlarged visibility splays, new warning signage, anti-skid surfacing, tapers on the junction corners; enlarged splinter island; safety enhancements to the bend of Star Hill Road to the south east of the site including white lining/ hatching; best endeavours to deliver a 40mph speed limit on Star Hill Road;
 - Improved cycling links to Knockholt Station including best endeavours to prevent parking in the cycle lane on Old London Road and creation of an advisory cycle lane in both directions on the A224 between the new roundabout at Otford Lane and land south of Polhil Garden Centre, commitment to a cycle hire scheme;
 - Upgrades to public rights of way and bridleways (including Polhill to Twitton bridleway and footpath to Knockholt Village);
 - Details and provision of a community bus service;
 - Compliance with Travel Plans and associated monitoring fees.

Planning Conditions

Definitions:

For the avoidance of doubt, these conditions rely on the following definitions:

“Detailed Permission”- relates to the area identified by plan 005561_S01 Rev.P3 as “Detailed Planning Application boundary”.

“X Enclave”- relates to the area outlined in red on plan 005561_S04 Rev.P2 and annotated as “QinetiQ’s red line boundary”.

1. The development to which this permission relates must be begun not later than whichever is later of the following dates: a) the expiration of 3 years from the date of this permission; or b) the expiration of two years from the approval of the final Reserved Matters permission.

Reason: In pursuance of section 92(2) of the Town and Country Planning Act 1990.

2. The first application for the approval of the Reserved Matters shall be made to the Local Planning Authority before the expiration of 5 years from the date of this permission.

Reason: In pursuance of section 92(2) of the Town and Country Planning Act 1990

3. No development shall take place until details of a Phasing Plan of the development has been submitted to and approved in writing by the Local Planning Authority.
Reason: In pursuance of section 92(2) of the Town and Country Planning Act 1990.
4. The final Reserved Matters application shall be made to the Local Planning Authority not later than 10 years following the approval of the first Reserved Matters application.
Reason: In pursuance of section 92(2) of the Town and Country Planning Act 1990 and to provide certainty over the delivery of the development.
5. For each Phase of Development identified by Condition 3, approval of details of the scale, layout, landscaping and appearance of the proposed development (hereinafter called the “Reserved Matters”) shall be obtained from the Local Planning Authority in writing before any development in that Phase is commenced.
Reason: In pursuance of section 92(2) of the Town and Country Planning Act 1990.
6. The plans and particulars of each relevant reserved matters application shall not exceed the maximum parameters of the development set out in the parameter plans: 00556I_: PP01 Rev.P3, PP02 Rev.P3, PP03 Rev.P3, PP04 Rev.P4, S02 Rev.P3.
Reason: To ensure the development is within the parameters assessed in the Environmental Statement accompanying the application.
7. For each phase of the submission of Reserved Matters applications pursuant to this permission, a “Compliance Report” shall be submitted that states how the Reserved Matters comply with the approved parameter plans and Mandatory Design Principals at Condition 11. If required an updated Phasing Plan shall also be submitted for approval in writing.
Reason: In pursuance of section 92(2) of the Town and Country Planning Act 1990.
8. Access to the site shall be carried out in full accordance with the details shown on drawings 41290/5501/044 Rev. A and 41290/5501/041 Rev.A in so far as they relate to the access to the site only.
Reason: To ensure safe access to the site and to comply with policy EN1 of the ADMP and the NPPF.
9. Before each phase of development identified pursuant to condition 3 is commenced the details submitted pursuant to reserved matters shall include, but not be limited to, the following details:
 - a) Any proposed access road(s) including details of horizontal and vertical alignment;
 - b) The layout, specification and construction programme for: any internal

- roads not covered by (a) above, footpaths, parking and turning areas (including visibility splays), cycle parking areas and cycle storage facilities;
- c) For the landscaping scheme: location of existing trees, hedges, shrubs and other vegetation to be retained and removed;
- d) Where applicable, retention of not less than a 15m buffer to the ancient woodland and trees labelled T136 and T137 within the report titled 'Arboricultural Impact Assessment Updated' ref RT-MME-152162 Rev.E (June 2020)
- e) The layout, character, structure and types of the proposed planting, together with an indicative schedule of planting species and tree retention.
- f) The layout and character of the proposed hard surfacing areas together with an indicative schedule of materials.
- g) Details of any earthworks proposed, contours to be formed and representative cross/long-sections.
- h) Location of lighting for roads, footpaths and other areas.
- i) Appropriate provision and distribution of play spaces.
- j) a strategy and design for street furniture which shall include, street lighting, waste bins, seating and any non-highway signage.
- k) Boundary treatments.

Reason: In pursuance of section 92(2) of the Town and Country Planning Act 1990.

10. The area of the Detailed Permission (defined by plan 00556I_S01 Rev.P3 as 'Detailed Planning Application boundary') shall be carried out in accordance with the following approved plans: 6699_101i, 00556J_Q14-13_: S06 Rev.P1, S07 Rev.P1, S08 Rev.P1, S09 Rev.P1, S10 Rev.P1, S11 Rev.P1, S12 Rev.P1, S13 Rev.P1, S19 Rev.P2, 00556J_MP_: S02 Rev.P1, S03 Rev.P1, S04 Rev.P1.

Reason: For the avoidance of doubt and in the interests of proper planning.

11. The development shall be carried out in accordance with the Mandatory Design Principals as detailed in the document titled "Fort Halstead: Design Principles Application Revision 1 May 2020" and which are indicated therein as mandatory.

Reason: To ensure that the details of the development are acceptable to the Local Planning Authority and to ensure the development conserves and enhances the special landscape character of the AONB and the setting of the designated heritage assets, to comply with policies EN1, EN4 and EN5 of the Sevenoaks ADMP.

12. Prior to commencement of works (including demolition and site clearance) on land comprising the Detailed Permission (being the area of the detailed planning application defined by plan 00556I_S01 Rev.P3 as 'Detailed Planning Application boundary'), a detailed ecological mitigation strategy for that part of the development shall be submitted to, and approved in writing by the Local Planning Authority. This will include the relevant proposals within the Framework Ecological Mitigation Strategy Rev A (by Middlemarch Environmental, May 2020).

Reason: To ensure appropriate mitigation for biodiversity, to comply with policy SP11 and the NPPF.

13. With the submission of the first reserved matters application (excluding reserved matters relating to the X Enclave), a site-wide Outline Mitigation Strategy shall be submitted to, and approved in writing by, the Local Planning Authority. The strategy will incorporate the measures within the Framework Ecological Mitigation Strategy Rev A (by Middlemarch Environmental, May 2020).

Reason: To ensure appropriate mitigation for biodiversity, to comply with policy SP11 and the NPPF.

14. With the submission of reserved matters for each phase identified pursuant to condition 3, an updated detailed mitigation strategy shall be submitted to and approved in writing by the Local Planning Authority. The strategy will accord with the details within the Outline Mitigation Strategy as agreed as Condition 12. The strategy will be adhered to thereafter.

Reason: To ensure appropriate mitigation for biodiversity, to comply with policy SP11 and the NPPF.

15. With the submission of a Reserved Matters application for each phase identified pursuant to condition 3, a detailed Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The document shall demonstrate compliance with the agreed Outline Landscape and Ecological Management Plan (by Middlemarch Environmental, June 2020) and shall include, where applicable, details for the management of the ancient woodland and management of public access within it. It shall also include details of how public footpaths within it will be maintained. The development shall be carried out in accordance with the approved details.

Reason: To ensure appropriate mitigation and management for biodiversity and the landscape, to comply with policy SP11 and the NPPF.

16. Before each phase of development identified pursuant to condition 3 is first occupied details of a scheme for external lighting and a programme of implementation shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure appropriate mitigation for biodiversity and to ensure the development conserves and enhances the special landscape character of the AONB, to comply with policies EN1 and EN5 of the ADMP, SP11 of the Core Strategy, and the NPPF.

17. Before each phase of development identified pursuant to condition 3 is commenced a detailed Construction Environmental Management Plan for Biodiversity (CEMP: Biodiversity) for that phase shall be submitted to, and approved in writing by, the Local Planning Authority. The content of the CEMP shall adhere to and support the principles of the approved overarching

Landscape and Ecological Management Plan for that phase. The development shall be carried out in accordance with the approved details.
Reason: To ensure adequate protection and mitigation for biodiversity during the construction process, to comply with policy SP11 of the Core Strategy and the NPPF.

18. Before each phase of development identified pursuant to condition 3 is commenced, details of all trees to be retained within (and immediately adjacent to) each phase, the 15m ancient woodland buffer and trees T136 and T137 (as identified in the report titled 'Arboricultural Impact Assessment Updated' ref RT-MME-152162 Rev.E June 2020) if they fall within or immediately adjacent to, that phase, shall be protected by a fence erected in accordance with the guidance contained in BS 5837:2012 and maintained during the course of development within that phase. Within the protection areas erected in accordance with the guidance contained in BS 5837:2012, the existing ground level shall neither be raised nor lowered and no materials, temporary buildings, plant, machinery or surplus soil shall be placed or stored within such areas without the prior written approval of the local planning authority. If any trenches for services are required in the fenced off areas they shall be excavated and backfilled by hand and any tree root encountered with a diameter of 25mm or more shall be left unsevered.

Reason: To ensure the protection of the retained, protected, ancient and veteran trees on the site during the construction process, to comply with policy EN1 of the ADMP and the NPPF.

19. No development shall commence (except for development within the X Enclave) until a site wide strategy to deal with potential risks associated with any contamination of the site has been submitted to, and approved in writing by the Local Planning Authority. This strategy will include the following: a preliminary risk assessment which has identified: all previous uses, potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors, and; potentially unacceptable risks arising from contamination of the site.

Reason: To ensure appropriate investigations are undertaken to inform a scheme of investigation and remediation as required, to ensure the development is safe for future users and to comply with the aims of the NPPF.

20. No development shall commence (except for development within the X Enclave) until a site investigation scheme, based on the findings of condition 19 and to provide information for a detailed assessment of the risk of all receptors that may be affected, including those off site, has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure appropriate investigations are undertaken to inform a scheme of investigation and remediation as required, to ensure the development is safe for future users and to comply with the aims of the NPPF.

21. No development on any phase identified pursuant to condition 3 (except for development within the X Enclave) shall be commenced until details of an options appraisal and remediation for that phase, based on the results of conditions 19 and 20, has been submitted to and approved in writing by the Local Planning Authority. Those details shall include: full details of the remediation measures required and how they are to be undertaken; details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete, and; details of any longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. The development shall be carried out in accordance with the approved details.

Reason: To ensure appropriate remediation is carried out as required, to ensure the development is safe for future users and to comply with the aims of the NPPF.

22. Prior to the occupation of any residential unit or the first commencement of any use within any phase (except for development within the X Enclave), a verification report, demonstrating the completion of works set out in the approved remediation strategy for that phase, and details of the effectiveness of the remediation shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To ensure appropriate remediation is carried out as required, to ensure the development is safe for future users and to comply with the aims of the NPPF.

23. If, during development on any part of the site (except for development within the X Enclave), contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out on that part of the site until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by the Local Planning Authority. The approved remediation strategy shall be implemented as approved.

Reason: To ensure appropriate remediation is carried out for any unexpected contamination, to ensure the development is safe for future users and to comply with the aims of the NPPF.

24. No development shall commence (except for development within the X Enclave) until a detailed sustainable surface water drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority. The detailed drainage scheme shall be based on the FRA and Drainage Strategy (Hydrock, September 2019) and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood

risk off site, and shall include details of measures relating to the drainage of highways and accesses.

The drainage scheme shall also demonstrate (with reference to published guidance):

- That silt pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters;
- Appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details. *Reason: To ensure the development does not increase the flood risk elsewhere, to comply with policy SP1 of the Core Strategy and the NPPF.*

25. No development on any phase identified pursuant to condition 3 shall be occupied until a Verification Report, pertaining to the surface water drainage system for that phase, and prepared by a suitably competent person, has been submitted to and approved in writing by the Local Planning Authority. The report shall demonstrate the suitable modelled operation of the drainage system where the system constructed is different to that approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason: To ensure the drainage systems are installed as approved to ensure the development does not increase the flood risk elsewhere, to comply with policy SP1 of the Core Strategy and the NPPF.

26. No infiltration of surface water drainage into the ground is permitted other than with the written approval of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure the development does not contribute to, or is not put at unacceptable risk from, water pollution caused by mobilised contaminants, to comply with the NPPF.

27. No development shall be commenced (except for development within the X Enclave) until a site wide foul drainage strategy, detailing how the developer intends to ensure that appropriate foul drainage is implemented with a connection to foul sewer, has been submitted to and approved in writing by the Local Planning Authority in consultation with the water undertaker and the Environment Agency. The development shall be constructed in accordance with the agreed detailed design and recommendations of the strategy.

Reason: To ensure the development does not contribute to, or is not put at unacceptable risk from, water pollution caused by mobilised contaminants, to comply with the NPPF.

28. Piling or other foundation designs using penetrative methods shall not be permitted other than in accordance with details first submitted to and approved in writing by the Local Planning Authority, where it has been demonstrated by a piling risk assessment that there is no resultant unacceptable risk to groundwater.

Reason: To ensure the development does not contribute to, or is not put at unacceptable risk from, water pollution caused by mobilised contaminants, to comply with the NPPF.

29. No construction traffic shall be permitted to use the Star Hill Road access at any time.

Reason: In the interests of highway safety, to comply with policy EN1 of the ADMP and the NPPF.

30. No development on any phase identified pursuant to condition 3 (including demolition and site clearance on any phase) shall be commenced until details of a construction traffic management plan for that phase have been submitted to and approved in writing by the Local Planning Authority. Those details shall include but not be limited to:

- Routing of vehicles;
- Employee parking;
- Delivery vehicle unloading and turning;
- Wheel washing facilities, and;
- Any requirements for traffic management.

The development on that phase shall be carried out only in accordance with the approved details.

31. Prior to the occupation or use of the first phase of the development identified pursuant to condition 3, full details of the Demand Responsive Transport service to serve the site shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that options for encouraging sustainable means of transport from the site are delivered, to comply with policies EN1 of the ADMP and SP1 of the Core Strategy, and the NPPF.

32. Prior to the occupation or use of each phase identified pursuant to condition 3, updated details of the Demand Responsive Transport service shall be submitted to and approved in writing by the Local Planning Authority. The service shall operate in accordance with the approved details.

Reason: To ensure that options for encouraging sustainable means of transport from the site are delivered, to comply with policies EN1 of the ADMP and SP1 of the Core Strategy, and the NPPF.

33. Prior to the occupation or first use of any part of the development (except for development within the X Enclave), details of a Bus Management Plan for the site shall be submitted to and approved in writing by the Local Planning Authority. The details shall outline the services that will serve the site and how demand will be monitored and how the bus service will respond to demand.

Reason: To ensure that options for encouraging sustainable means of transport from the site are delivered, to comply with policies EN1 of the ADMP and SP1 of the Core Strategy, and the NPPF.

34. Prior to commencement of any phase identified pursuant to condition 3, details of a scheme of electrical vehicle charging points within that phase shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out only in accordance with the approved details and those charging points shall be available for use prior to the occupation of the buildings they serve.

Reason: To ensure the delivery of electrical vehicle charging points, to comply with policy T3 of the ADMP.

35. Prior to commencement of development on any phase identified pursuant to condition 3, a building retention and demolition management plan for that phase shall be submitted to and approved in writing by the local planning authority. This shall include: a) details of the methods of protection of the buildings to be retained and b) the details of a demolition management strategy. Demolition shall occur only in accordance with the approved details and all buildings to be retained shall be protected in full accordance with the approved details for the duration of construction on that phase.

Reason: To preserve the historic site and its designated and non-designated heritage assets as supported by Policy EN4 of the ADMP and the NPPF.

36. No development on any phase identified pursuant to condition 3 shall take place until a method statement for the salvage, secure storage and re-use of items of historic interest including: original street lamps, other street furniture, building numbers, street name signs and, the red information board outside the M series/Bunkers, has been submitted to and approved in writing by the Local Planning Authority. No development shall be carried out other than in accordance with the approved method statement.

Reason: To preserve the heritage and historical importance of the site in accordance with policy EN4 and EMP3 of the Sevenoaks ADMP and the NPPF.

37. No development shall take place pursuant to any phase identified by condition 3 until methodology for recording the architecture and/or archaeology buildings prior to and during demolition on that phase has been submitted to and approved in writing by the Local Planning Authority. No demolition shall be carried out other than in accordance with the approved methodology and the records or reports shall be stored in accordance with the approved methodology.

Reason: To preserve the heritage and historical importance of the site in accordance with policy EN4 and EMP3 of the Sevenoaks ADMP and the NPPF.

38. Prior to commencement of development on any phase identified pursuant to condition 3, an archaeological impact assessment and archaeological landscape survey shall be submitted to and approved in writing by the Local Planning Authority, including a written specification and timetable. The

development shall be implemented in accordance with the approved archaeological impact assessment.

Reason: To preserve the heritage and historical importance of the site in accordance with policy EN4 and EMP3 of the Sevenoaks ADMP and the NPPF.

39. Prior to commencement of development on any phase identified pursuant to condition 3, details of archaeological field evaluation works, shall be submitted to and approved in writing by the Local Planning Authority. This shall include details of any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording if necessary. The development shall be carried out in accordance with the approved details.

Reason: To preserve the heritage and historical importance of the site in accordance with policy EN4 and EMP3 of the Sevenoaks ADMP and the NPPF.

40. Prior to the first occupation of any dwelling or use of any community or employment floorspace (except for development within the X Enclave), written confirmation shall be provided to the Local Planning Authority to demonstrate that either: a) all water network upgrades required to accommodate the additional flows to serve the development have been completed; or b) a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason - To ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development, to comply with policy EN2 and the aims of the NPPF.

41. No development (except for development within the X Enclave) other than the enabling works shall take place until an impact study of the existing water supply infrastructure has been submitted to and approved in writing by the Local Planning Authority. The study should determine the magnitude of any new additional capacity required in the system and a suitable connection point a programme of implementation for any works. No development shall be carried out otherwise than in accordance with the approved scheme.

Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand. This is supported by policy EN1 of the ADMP and the NPPF.

42. Prior to commencement of development on any phase identified pursuant to condition 3, a demolition and construction environmental management plan (CEMP), specific to amenity issues, for that phase shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

The CEMP shall include:

- a. Details of the proposed working hours;

- b. Details of the design and location of the construction access:
- c. A site waste management plan
- d. Details of temporary utilities
- e. How the construction will comply with the sustainable use of soils on construction sites
- f. Details of a communication strategy to include the provision of a dedicated phone line for residents to contact the site manager directly with complaints which should be manned whenever site works are in progress.
- g. Details of a routing agreement for the site construction traffic and HGV traffic associated with the movement of bulk material to and from the site
- h. Details of means of suppressing dust during the construction process to include the regime for dust deposition measurement at the site boundaries;
- i. Details of the measures to mitigate the noise and vibration from construction;
- j. Details of a surface water drainage scheme for the temporary drainage of the Site.

Reason: To preserve highway safety and to protect residential amenity, to comply with policies EN1, EN2 and EN7 of the ADMP.

43. Prior to the commencement of development on any phase identified by condition 3 and which includes residential development, details shall be submitted to and approved in writing by the Local Planning Authority to demonstrate the provision of outdoor play space, including details of a scheme for its implementation. The development shall be carried out in accordance with the approved details.

Reason: To ensure delivery of adequate play facilities across the site and to comply with policy EN2 of the ADMP.

44. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 as amended and the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, (or any order revoking, re-enacting or modifying that Order), all buildings and units occupied for commercial uses (all uses other than C3) within the development shall be used only for the purposes described in this application comprising uses falling within the use classes A1, A3, A4, A5, B1a, D1 and D2 of the Use Classes Order 1987 (as amended) prior to 1 September 2020. Those buildings shall only be used for those uses for which they are first occupied and will not benefit from use class permitted development subsequently.

Reason: To ensure delivery of a mixed use village centre and the delivery of appropriate employment uses on the site, and to protect highway safety, to comply with policies SP1 of the Core Strategy and EMP3 of the ADMP.

45. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any Order revoking or re-enacting or amending those Orders with or without modification), planning permission shall be required in respect of development falling within Schedule 2, Part 7, Classes A, F, H, J, M, N.

Reason: To ensure protection of the ancient woodland, protected trees and habitats on the site, to comply with policies SP1, SP11 of the Core Strategy, EN1 and EN5 of the ADMP.

46. Prior to commencement of any works to the Scheduled Ancient Monument details shall be submitted to, and be approved in writing by the Local Planning Authority of any proposed landscaping works, including the removal of trees within the curtilage of the Scheduled Ancient Monument. No development will be carried out otherwise than in accordance with the approved details.

Reason: To preserve the historic significance of the Scheduled Ancient Monument as supported by Policy EN4 of the Sevenoaks ADMP.

Conditions Relating to the X Enclave

(relating to the area outlined in red on plan 005561_S04 Rev.P2 and annotated as “QinetiQ’s red line boundary”)

47. With the submission of the first reserved matters application relating to the X Enclave, an Ecological Mitigation Strategy for that part of the site shall be submitted to, and approved in writing by, the Local Planning Authority. The strategy will incorporate the measures within the Framework Ecological Mitigation Strategy Rev A (by Middlemarch Environmental, May 2020).

Reason: To ensure appropriate mitigation for biodiversity, to comply with policy SP11 and the NPPF.

48. No development shall commence within the X Enclave until a strategy to deal with potential risks associated with any contamination on that part of the site has been submitted to, and approved in writing by the Local Planning Authority. This strategy will include the following: a preliminary risk assessment which has identified: all previous uses, potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors, and; potentially unacceptable risks arising from contamination of the site.

Reason: To ensure appropriate investigations are undertaken to inform a scheme of investigation and remediation as required, to ensure the development is safe for future users and to comply with the aims of the NPPF.

49. No development shall commence within the X Enclave until a site investigation scheme, based on the findings of condition 48 and to provide information for a detailed assessment of the risk of all receptors that may be affected, including those off site, has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure appropriate investigations are undertaken to inform a scheme of investigation and remediation as required, to ensure the development is safe for future users and to comply with the aims of the NPPF.

50. No development within the X Enclave shall be commenced until details of an options appraisal and remediation for that area, based on the results of

conditions 48 and 49, has been submitted to and approved in writing by the Local Planning Authority. Those details shall include: full details of the remediation measures required and how they are to be undertaken; details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete, and; details of any longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. The development shall be carried out in accordance with the approved details.

Reason: To ensure appropriate remediation is carried out as required, to ensure the development is safe for future users and to comply with the aims of the NPPF.

51. Prior to the occupation of any building within the X Enclave, a verification report, demonstrating the completion of works set out in the approved remediation strategy for that phase, and details of the effectiveness of the remediation shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To ensure appropriate remediation is carried out as required, to ensure the development is safe for future users and to comply with the aims of the NPPF.

52. If, during development within the X Enclave, contamination not previously identified is found to be present on that part of the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out on that part of the site until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by the Local Planning Authority. The approved remediation strategy shall be implemented as approved.

Reason: To ensure appropriate remediation is carried out for any unexpected contamination, to ensure the development is safe for future users and to comply with the aims of the NPPF.

53. No development shall commence within the X Enclave until a detailed sustainable surface water drainage scheme for that part of the site has been submitted to and approved in writing by the Local Planning Authority. The detailed drainage scheme shall be based on the FRA and Drainage Strategy (Hydrock, September 2019) and shall demonstrate that the surface water generated by this part of the development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk off site, and shall include details of measures relating to the drainage of highways and accesses.

The drainage scheme shall also demonstrate (with reference to published guidance):

- That silt pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters;

- Appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason: To ensure the development does not increase the flood risk elsewhere, to comply with policy SP1 of the Core Strategy and the NPPF.

54. No development shall be commenced within the X Enclave until its foul drainage strategy, detailing how the developer intends to ensure that appropriate foul drainage is implemented with a connection to foul sewer, has been submitted to and approved in writing by the Local Planning Authority in consultation with the water undertaker and the Environment Agency. The development shall be constructed in accordance with the agreed detailed design and recommendations of the strategy.

Reason: To ensure the development does not contribute to, or is not put at unacceptable risk from, water pollution caused by mobilised contaminants, to comply with the NPPF.

Informatives

1. Please be aware that this development is also the subject of a Legal Agreement under Section 106 of the Town and Country Planning Act 1990.
2. Part of the development subject to this notice falls within a highlighted proximity of a mains gas pipe which is considered a major hazard. The applicant/ agent/ developer is strongly advised to contact the pipeline operator PRIOR to ANY works being undertaken pursuant to the permission granted/ confirmed by this notice.
Address is: Southern Gas Networks Plc, SGN Plant Location Team, 95 Kilbirnie Street, Glasgow, G5 8JD. Tel: 01414 184093 OR 0845 0703497
Search online at: www.linesearchbeforeyoudig.co.uk . SGN personnel will contact you accordingly.

RECOMMENDATION B: If the S106 legal agreement is not completed in accordance with the above recommendation (A), that planning permission be REFUSED on the following grounds:

- 1 The proposal fails to make provision for affordable housing and is therefore contrary to the NPPF and the Sevenoaks Affordable Housing Supplementary Planning Document.
- 2 In the absence of an affordable housing contribution which would contribute to meeting an identified affordable housing need in the District, the proposals would be inappropriate development in the Green Belt by definition, contrary to the NPPF.
- 3 The proposal fails to provide appropriate safeguards to protect the ecology, biodiversity and protected habitats on the site, to provide and manage open spaces

and to conserve and enhance the Area of Outstanding Natural Beauty contrary to policies SP1, SP11 and L08 of the Core Strategy, policy EMP3 and EN5 of the ADMP and the NPPF.

- 4 The proposal fails to provide safeguards to protect the designated and non-designated heritage assets on the site, contrary to policy SP1 of the Core Strategy, policies EMP3 and EN4 of the ADMP and the NPPF.
- 5 The proposal fails to make provision for the appropriate and necessary highway and transport improvements required to mitigate the impacts arising from the development, contrary to policy SP9 of the Core Strategy, policies EMP3 and T1 of the ADMP and the NPPF.

Assessment Summary

1. To assist Members, a summary of the report for this proposal is set out below and paragraph 17 at the bottom of this section contains a list of the report's contents and the relevant paragraph numbers. Further details on all the issues are set out in full in the main body of the report.
2. The site is previously developed land by definition, and currently contains multiple built forms and structures associated with its use by DSTL. This includes perimeter fencing, substantial areas of hard surfacing and buildings of varying heights including several exceeding 12 metres and others with chimneys that are visible above the line of the surrounding woodland. The site benefits from an extant, and implemented, planning permission granted in 2015 for mixed use development for up to 450 homes, up to 27,000sqm of business floorspace, a hotel and village centre. A more detailed description of the development is set out below.
3. These current proposals would provide a mixed use development providing housing, employment opportunities, as well as community facilities around a central village centre. The proposals also include land for a primary school should it become necessary to support local population growth in the future. The suite of planning conditions and planning obligations that would be secured through a Section 106 agreement include appropriate measures to improve the sustainability of the site in terms of its accessibility and local connections. The S106 obligations would include improvements to the local highway network, details of the employment floorspace and community floorspace including marketing strategies and provisions for healthcare providers, on site affordable housing units, delivery of open space, ecology and landscape management, and heritage works.
4. Since planning permission for the earlier scheme was granted, in 2015, there have been significant changes to planning policy, that impact on how this current application is to be considered. A summary of the policy context and the weight to be given to national and local policies is set out at the beginning of the appraisal at paragraph 499 onwards and explained in more detail throughout the report.

5. In summary, the NPPF provides the potential for more development on the site, with an increase in the number of residential units, to make more effective use of land. The NPPF also provides the potential for the scheme to be appropriate in the Green Belt where it provides affordable housing, even though the quantum of development has increased compared to the previous permission, providing there is no substantial harm to openness, and other criteria are met.
6. When considering the policy context, para 2 of the NPPF states that, as set out in planning law, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. For those policies that are out of date, they should be given less weight, to the extent that they are out of date (in accordance with para 213 of the NPPF).
7. As the NPPF is more up to date, Policy EMP3, is now given less weight, to the extent that it is inconsistent with the NPPF. A proposal that maintained the proposed quantum of employment development, and also increased the number of residential units, as supported by the NPPF, would alter the balance between these uses so that a proposal may not be seen as 'employment led'. A proposal that complied with Policy EMP3 as a whole, would be inconsistent with the requirements of the NPPF.
8. In the absence of a five year supply of land for housing in Sevenoaks District, the 'tilted balance' required by the NPPF is engaged and we are required to give weight in favour of granting planning permission for this development. The proposals would make a significant contribution to the District's Housing Stock including a mix of housing types and tenures including on site affordable housing. While the previously emerging Local Plan has no weight, the site was one which the Council identified to help meet its housing need through increasing the site allocation to 750 homes.
9. The proposals have been amended during the course of the application in response to concerns raised through public consultation and the number of housing units has been reduced from 750 to 635. As a result densities have been reduced. These are considered appropriate to this context and has enabled improvements in respect of the highways and landscaping issues.
10. The proposals are found to be appropriate development in the Green Belt, as they meet the criteria for appropriate development given in the NPPF by providing a contribution to affordable housing and by causing less than substantial harm to the Green Belt. Paragraph 604 of this report onwards refer to the Green Belt issues in more detail.
11. The proposals provide the opportunity for the site to be opened up to the public through the removal of physical barriers and the reinstatement of routes including public footpaths through the site, giving the opportunity for the landscape character of the site and its unique heritage, ecology and woodland to be appreciated by the public. Through the use of conditions and a S106 legal agreement, the site's natural landscape, flora and fauna can be appropriately preserved and enhanced through securing long term management of the site's green infrastructure. The proposed building heights

have been lowered during the course of the application, serving to reduce the impact of the development on the wider landscape character and views across it and the application provides the opportunity to improve lighting emissions from development on the site.

12. Despite much of the application being only in outline form, details of the design of the development have been provided, which include mandatory design principals for the different character areas of the development. The detailed part of the application includes a village centre comprising mixed uses and public open space, focused around two historic buildings and the entrance to the Fort. This provides greater certainty of the likely appearance of the development and provides increased certainty that the development can be landscape-led, delivered to a high standard and deliver a strong sense of place.
13. The proposals rely on the use of two site accesses for safety purposes. These utilise the existing access points from Crow Drive and Star Hill Road. A suite of highways works are proposed which would facilitate safe access at these points, including a new roundabout at the junction of Polhill, Shoreham Lane and Crow Drive. The application is accompanied by a detailed Transport Assessment which is supported by the Highways Authority and it can be concluded that the impact of the development on the highway network would not be severe. Highways issues are discussed from paragraph 765.
14. The proposals would provide up to 27,773sqm of employment floorspace on the site, located primarily to the western side of the site to utilise the access to Polhill. This is a greater amount of employment floorspace than approved in 2015 and could provide for more job opportunities on the site than the site historically provided.
15. The site has a rich history and contains a number of both designated and non-designated heritage assets. The proposals would cause less than substantial harm to the heritage assets of the site, and provide notable heritage benefits through introducing a sustainable use to the site and providing opportunities for those assets to become accessible to the public and retained and managed appropriately in the future, which is welcome.
16. The ‘planning balance’ is considered at the end of this report and this weighs the positive and negative attributes of the development. Overall, subject to the conditions described and the provisions of the S106 legal agreement, the development is considered to be policy compliant and it is recommended that the application be approved. Paragraph 928 onwards describes how the planning balance has been applied in this case.
17. This report comprises the following sections:

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Description of Site

18. The application site, known as Fort Halstead, comprises approximately 75 hectares of land at the top of the North Downs Scarp approximately 8 kilometres to the north of Sevenoaks. The site lies to the east of the village of Knockholt and south-east of Halstead. Polhill runs to the east of the site with the M25 beyond and Star Hill to the west and south. It is located within the Kent Downs Area of Outstanding Natural Beauty and the Green Belt, and includes large areas of woodland (including c.45 ha of designated Ancient Woodland) and open space.
19. The site's principle access exists at the most southern end of Crow Drive and the site has additional vehicular access from Star Hill to the west. The site is located entirely within the administrative boundary of Sevenoaks District Council and falls within the following Parishes, being: Halstead, Dunton Green, Chevening and Badgers Mount.
20. The site is currently a secure employment site, occupied by DSTL and QinetiQ and is bound entirely by security fencing to its perimeter. The built forms currently existing on the site have developed over time and vary substantially in their nature and character. The site includes the Scheduled Ancient Monument of the Fort which includes three listed buildings (of which one is Grade II and two are Grade II*), located close to the south eastern boundary

of the site, and a separate Grade II listed building located more centrally within the site and referred to as building Q14 or “The Penney Building”. The other buildings across the site have been developed in phases, linked to the operational requirements of the site. The site previously comprised up to 350 buildings, but this has now been reduced due to demolitions carried out by DSTL in association with their relocation away from Fort Halstead.

21. The uses on the site are those associated with the occupation by DSTL and QinetiQ, including primarily offices, workshops and laboratories. In 2004 the Council issued a Certificate of Lawful Development which confirmed that for planning purposes the lawful use of the site was for “B1 purposes (research and development, offices, light industry) with ancillary uses including B8 (storage/distribution) canteen, energetic material testing and social club.”
22. The red line of the application site includes the entirety of Crow Drive and extends northwards up to include its junction with Polhill.

Description of Proposal

23. The application which has been submitted is a hybrid planning application. This means the application is a combination of an outline application and a detailed planning application for part of the same site.
24. An application for outline planning permission allows for a decision on the general principles of how a site can be developed. Outline planning permission can be granted subject to conditions requiring the subsequent approval of one or more ‘reserved matters’. Reserved matters are those aspects of a proposed development which an applicant can choose not to submit details of with an outline planning application but can submit for approval at a later date. Planning legislation defines Reserved Matters as being: access; appearance; landscaping; layout, and scale.
25. In this case the application form confirms that, insofar as the outline part of the application is concerned, the applicant seeks approval only of the access to the site. Other reserved matters, being appearance, landscaping, layout and scale, would be subject to subsequent applications in the future.
26. In this case the large majority of the proposals are proposed only in outline. The outline parts of the development include:
 - residential development for a mix of uses including 635 new dwellings;
 - up to 27,773 m² (GEA) of business floorspace across use classes B1 a, b and c (B1 now falls within use Class E(g)) ;
 - creation of a mixed use village centre, comprising use classes A1 (shops), A3 (cafes and restaurants), A4 (drinking establishments), A5 (hot food take aways) , B1a (offices), D1 (Non-residential institutions) and D2 (Assembly and leisure) (of which former use classes A1/2/3 have been replaced with use class E(a,b,c), D1 and D2 uses have become new use classes E(d-f) and F1 and F2(c-d) and A4 and A5 uses have become defined as Sui Generis);

- works to create an enclave for energetic testing operations with associated fencing, access and parking;
 - land safeguarded for a primary school;
 - change of use of Fort Area and bunkers to Historic Interpretation Centre (former use class D1, now F1) with workshop space and; associated landscaping, works and infrastructure.
27. The description of the application was drafted before the change in legislation affecting Use Classes. The implications of this for this proposal are set out in more detail in this report.
 28. Two accesses are proposed to the site, utilising the existing points of access to the site. These are from Crow Drive to the east of the site, and Star Hill to the west.
 29. The Council is being asked to consider parameter plans as part of this application and these demonstrate development principles for the outline part of this proposal, that any reserved matters application would have to comply with. The applicant has also provided a “Design Principals” document which provides guidance for the different character areas of the site and includes mandatory design principles, which the development forming the outline proposals would also need to adhere to. This is discussed further in turn below.
 30. The detailed part of the planning application relates to a smaller part of the wider site, around the listed Penney building and containing part of the proposed village centre. This is an area located centrally within the site, to the north of the Fort Area. The works proposed for full detailed planning permission include: works including extension and associated alterations to buildings Q13 and Q14 in connection with their change of use to B1 and D1 uses (now Class E(g) and F1), including a glazed atrium linking the two; associated landscaping and public realm works.
 31. In this case the development requires an Environmental Impact Assessment and the application has been accordingly been accompanied by an Environmental Statement in accordance with the Town and Country Planning (Environmental Impact Assessment) Order 2017 as amended.

Relevant Planning History

32. A large number of planning applications have been submitted for this site but the most relevant to this application are the following:
33. 22nd March 2004: 03/02897/LDCEX- Certificate of Lawful Development granted under delegated powers for:

“Existing lawful use in respect of B1 purposes (research and development, offices, light industry) with ancillary uses including B8 (storage/distribution) canteen, energetic material testing and social club.”
34. 30th December 2015: 15/00628/OUT- Outline Planning Permission, granted by the Development Control Committee for:

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

35. This permission was subject to conditions and a Section 106 legal agreement. Details remain publically available using the reference number 15/00628/OUT.
36. The following conditions of that planning permission have been discharged:
 - Condition 13, relating to land contamination investigations and strategies insofar as building R29.1 was concerned, approved 13.03.2018 under reference 18/00190/DETAIL;
 - Condition 20, relating to submission of a Construction Environmental Management Plan (CEMP) relating to enabling works, approved 13.03.2018 under reference 18/00191/DETAIL;
37. A number of subsequent changes were made the conditions of the planning permission, in order to vary only the trigger of when the details were required to allow their submission after the demolition of building R29.1. These were as follows:
 - Amendment to condition 24, relating to a slope stability assessment, approved under reference 18/00188/NMA;
 - Amendment to condition 22, relating to a demolition management plan, approved under reference 18/00187/NMA;
 - Amendment to condition 21, relating to a landscape and ecological management plan, approved under reference 18/00185/NMA;
 - Amendment to conditions 16 and 17, relating to a historic interest method statement and archaeology of buildings, approved under reference 18/00184/NMA;
 - Amendment to condition 14, relating to highway safety, approved under reference 18/00155/NMA.
38. 13th December 2018: 18/02662/LDCEX- Lawful Development Certificate for existing development granted under delegated powers for the “Demolition of building R29.1 on site”. The certificate confirms that the removal of the building was lawful as it was one identified for demolition under the 2015 outline planning permission. The granting of the certificate therefore in effect confirmed that the 2015 outline permission had been lawful implemented.
39. 11th October 2019: Planning permission granted for the “relocation and re-installation of six explosive magazine stores (Use Class B8) and construction of four surrounding concrete pendine block wall”. This application was made by QinetiQ and related only to the southern part of the site.

Relevant Policies

40. National Planning Policy Framework (NPPF)
41. Sevenoaks Core Strategy (CS): LO1, L08, SP1, SP2, SP3, SP5, SP7, SP8, SP9, SP10, SP11
42. Allocations and Development Management Plan (ADMP): SC1, EMP2, EMP3, EN1, EN2, EN4, EN5, EN6, EN7, GI1, GB10, LT1, T1, T2, T3
43. Other:
 - National Planning Practice Guidance
 - National Design Guide
 - Sevenoaks Development In the Green Belt SPD
 - Sevenoaks Countryside Assessment SPD
 - Sevenoaks Affordable Housing SPD and 2020 Update
 - Kent Downs AONB Management Plan
 - Kent Design Guide SPD
 - The Kent Downs AONB Management Plan 2021-2026 (not yet adopted by SDC)

Constraints

44. Relevant planning constraints include:
 - Green Belt
 - Kent Downs Area of Outstanding Natural Beauty
 - Area of Special Control of Advertisements
 - Ancient Woodland
 - Scheduled Ancient Monument
 - 4 listed buildings
 - Public Rights of Way run around the site
 - Airfield Safeguarding Zone
 - Partly within an Air Quality Management Area
 - Area of Archaeological Potential - Fort and edges of site to south that are not proposed for development.
 - North eastern boundary lies very close to a Local Wildlife Site - Woods West of Shoreham (the boundary is on the opposite side of the A224).
 - Other side of Star Hill is a Local Wildlife Site - Chevening Estate
 - Outer safeguarding zone for gas pipe

Consultations

45. Four rounds of public consultation have been undertaken.
46. The **first consultation** was undertaken from October 2010 and was based on the following description of development and associated supporting documents:
47. “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.”

48. The consultation process comprised letters to adjoining properties, erection of three site notices around the site, and advertisement in a local publication.
49. The consultation responses to this initial consultation remain publically available at this time on the Council’s website and those most relevant are discussed within the body of the report below.
50. Revisions to the scheme were made in July 2020, including a reduction in the quantum of residential development proposed from 750 homes to 635.
51. The **second public consultation** commenced in July 2020 and was based the following description of development and associated revised documents:
52. “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.”
53. A **third round of consultation** was undertaken in March 2021 following changes made the application in relation to the buildings being removed and retained within the “X- enclave”. This entailed the retention of 4 buildings that were previously shown to be demolished, and the demolition of 2 additional smaller buildings.
54. A **fourth round of consultation** was undertaken in April 2021, following a minor change to the northern edge of the red line boundary. Detailed drawings of the site accesses were also included.
55. For clarity, the consultation responses below relate only to the second, third and fourth rounds of public consultation, which relate to the scheme for 635 dwellings.

Parish Council Consultations:

56. The site falls in four Parishes: Halstead, Dunton Green, Chevening and Badgers Mount. The site also adjoins the Parishes of Knockholt, Shoreham and Otford.

57. Knockholt Parish Council

58. July 2020 Consultation:

59. Objection. "We think it is unreasonable to expect comments on a project of this magnitude within three weeks but we strongly object to the amended proposal for the following reasons;

The housing density based upon dwellings per hectare is far too vague since actual dwelling size remains unspecified and hence the likely population density per hectare is unspecified.

Star Hill access is both dangerous and impractical. No traffic predictions included.

Covid lockdown has demonstrated viability of large scale homeworking hence planning targets now need major revision to incorporate the conversion of redundant commercial and office space to meet the domestic targets.

Infrastructure already in place for these easy conversions along with use of existing transport links.

With regard to the Local Plan hearings in autumn 2019, the Inspector raised the following points about the Fort Halstead site, and we quote:

Q340. Is the proposed housing allocation deliverable and/or developable in accordance with the housing trajectory? In particular, is it: (b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided? (c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

Q341. What are the exceptional circumstances for removing this proposed site from Green Belt? Q342. Has full consideration been given to the impact of this development on the Green Belt? Q343. Has full consideration been given to the impact of this development on the AONB?

Q344. Has full consideration been given to the impact of this development on local wildlife, biodiversity, ancient woodland and existing local infrastructure, services and facilities, including GP surgeries and schools?

She obviously had serious concerns regarding each of these points which still need to be addressed.

With particular respect to Q 340(b) and (c) and to Q 344 we would raise the following points:

In SDC's own Site Allocation tables handed out in Week 2 of the Hearing, the 'Combined Population, Services, Green Belt and Employment Scores' for the settlements of Knockholt, Halstead and Badgers Mount, were 20, 15 & 7, placing us in the 'Small Villages' and 'Hamlet' classifications respectively, the low scores relating to the already existing situation of population,

services, Green Belt and employment for the 3 settlements and clearly demonstrates inability to sustain the proposed massive increases.

The 'carrot' of improvements in infrastructure is a 'smoke and mirrors' concept as local transport links are severely limited by the inability to increase rail services in the foreseeable future (nothing before 2045?), as stated by Network Rail. Local bus services have been slashed, local major roads are already congested and village lanes, some little more than single track, just could not cope. The proposals, far from bringing benefits to the area, will destroy established rural communities and affect large areas of Green Belt and AONB with their ancient woodland and rich biodiversity.

It is clearly stated that larger development should be associated with higher tier settlements, also that new housing should correlate with 'local need' but it does not! The Allocations policy appears to fly in the face of these concepts by failing to share the load proportionately among the various ranks of settlements in the district.

Fort Halstead already has outline planning permission as an employment led development for 450 homes. If development is to comply with the stated intention to keep new housing densities in line with the existing settlements (ours are currently 18.8 dph) even the current proposal for a reduction in dwellings to 615 represents an uplift of a further 165 homes on top of an already inappropriate 450, a totally unacceptable prospect and further proof that this would be overdevelopment with an average housing density of 38.35dph.

In 2015 when permission was granted for the 450 homes a comprehensive report by Waterman revealed widespread contamination of the site, with at least 38 of the sampled areas being considered above acceptable levels for residential use. Their supplementary report on Remediation required extensive measures to protect construction workers and to ensure that levels would be such that the known routes of transfer of toxic substances (direct/indirect ingestion, dermal contact, inhalation) to future site occupants/visitors would be acceptable - even though they classified the risk as 'low'! If soil and/or made ground needs to be removed from the site, local residents have serious concerns about the environmental risk of spread of any toxic materials during disturbance and transport through the area.

It is of particular concern that during the past 30 years there have been at least 6 cases of Guillain Barre syndrome in this small area, a rare but severe neurological condition that is only expected to occur in 1.2-1.5 people in 100,000 - therefore six cases in a combined local village population of approximately 3,500 is way beyond the predicted normal incidence. It is known that this condition can result from exposure to certain viruses and some chemical agents, such as mustard gas. We leave the planning officer to make their own conclusions.

In the outline-approved 450 home scheme, the main access is at the North of the site, but there is only limited use (public transport, utility vehicles, cycles and pedestrians) of Star Hill Road to the South West. Locals are aware of the dangers of this steep hill with its sharp bends, having witnessed two

fatal accidents in recent memory, and it is frequently impassable in wintry conditions. It is essential that this access remains restricted, otherwise to avoid the inevitable and already existing congestion on the major roads, drivers will divert through the narrow roads and lanes of our villages, not only causing gridlock, but also contributing to climate change through increased air pollution.

It is common knowledge that people will use the hospitals nearest to them and at the Princess Royal, the nearest hospital to the site, facilities were already overstretched, particularly the A/E Department, due to lack of beds - even prior to the Covid 19 crisis, and some GP surgeries have closed their lists or even closed completely. The potential large numbers of new residents will certainly not travel long distances to hospitals to the South of the district when the PRUH is 10 to 15 minutes away, so will inevitably add to the pre-existing problems. The offer of on-site facilities does not guarantee a service if the NHS cannot staff them. The Rydale development at Dunton Green is a typical example, no medical facility, just more dwellings!

Another serious infrastructure concern is the totally unreliable water supply at the Fort and the pre-existing local housing. There have been multiple supply failures over the years, the more recent ones include lengthy losses of supply to residents, the latest last year for in excess of thirty weeks, with households having to rely on bottled water.

We fully endorse the comprehensive structured objection from the Knockholt Society and also the objection from Shoreham Parish Council, both of which present irrefutable points for consideration.

In summary, we request that this application be put on hold pending clarification of the above points especially a major revision of the SDC housing needs / availability as a result of the impact of Covid 19 on home working and the resultant large surplus of commercial space.”

60. March 2021 Consultation:

61. “We are unimpressed by the agent’s reference to the ‘London Borough of Sevenoaks’! If the quality of their research and insight into the area and situation is so totally inept, we have grave concerns about their proposals over other aspects of the scheme.

Yet again we are confronted by a proposed development that is over complicated, oversized and not wanted. We refer to the 2019 Hearing into the submitted Local Plan and the 7 specific questions from the Inspector regarding the Fort Halstead site (listed below) to which answers are still awaited and relevant: -

Q340 (b.) Is the proposed housing.....supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided? (c.)deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

Q341. What are the exceptional circumstances for removing this proposed site from the Green Belt? Q342. Has full consideration been given to the impact of this development on the Green Belt? Q343. Has full consideration

been given to the impact of this development on the AONB? Q344. Has full consideration been given to the impact of this development on local wildlife, biodiversity, ancient woodland, and existing local infrastructure, services and facilities, including GP surgeries and schools? Q345. Would the increase of (300) dwellings on this allocated site represent an overdevelopment? Q346. What evidence is there to support the anticipated completions on this site? 450 permitted units by 2031 (plus predicted completions for any additional numbers).

We feel that this is an ill-conceived, contrived development, offering yet more commercial form, and justifying the bulk form of this commercial build (of which there is already a large amount vacant in the nearby area, currently put forward for housing in the Local Plan) to obtain the increased housing figure, but once the bulk form is agreed as outline permission, there is no means of stopping allegedly 'non-viable commercial' being turned into yet more housing!

The infrastructure in the locality will be unable to cope with the increase in traffic, Polhill is already struggling, with the future threat of being reduced to one lane in either direction as the result of ongoing monitored subsidence. The railway station has insufficient parking, with both parts of the car park being sold off. Furthermore, Network South East Rail have already confirmed there can be no increase in service as trains cannot increase in size because platforms further up the line are not large enough, and there is no possibility of more trains before 2044. We ridicule the repetitive promotion of cycling as the solution to the inevitable gridlock that will be caused by circa 2000+ private cars and numerous vans using the commercial premises. The developers should be challenged to explain exactly how the residents are expected to travel and access shops, schools and healthcare. This application would rely on the use of cars, as Public Transport is nigh on non-existent and if people with older vehicles were to enter the London Borough of Bromley they would be entering the Low Emission Zone and subject to exorbitant fines, which puts the nearest hospitals, the Princess Royal Hospital, Farnborough and Orpington Hospital out of bounds, incurring lengthy journeys to hospitals in Kent.

We fully understand what 'outline' planning means, it is a blueprint for the developer to 'cherry pick' where they want to put the development and when, and as previously said, once granted in principle, the countryside would be irreparably blighted. The cumulative effect this proposal (plus others at Appeal or threatened) would create a housing surplus in this area, whereas it is stated that development should be appropriate to local need.

According to SDC's own Allocation Tables handed out at the Local Plan Hearing, the 'Combined Population, Services, Green Belt and Employment Scores' for our settlements were 20, 15, and 7, placing us in the 'small villages' and 'hamlet' categories - clearly demonstrating the inability to sustain the proposed massive increases.

The proposal does not comply with SDC's own ADMP, which states any major development should to be at the major sites of Sevenoaks, Westerham,

Edenbridge and Swanley.

We insist that a fully detailed Energy Requirement Study be undertaken for the site, which is currently heated by oil which will be neither adequate or environmentally desirable - will they all be electrically heated, and all have car charging points? We also question the adequacy of the water supply to the site as it has been widely reported that over the past two years the existing residents have had to survive for a total of 38 weeks on bottled water alone, how can this be justified in the 21st century? How will the proposed housing and commercial need be met?

All of these points are not just concerns of the local residents, but were raised by the Inspector at the Local Plan Hearing in 2019 as questions requiring detailed responses, as listed above. This development and totally inadequate infrastructure does not take into consideration the 200 HGV movements per day which would be generated from the Chevening bund construction and the Westerham quarry infill adding to the inevitable increase in traffic on the rural lanes. Finally, we find this application an ill-conceived over development which would be on highly contaminated land (as per the Waterman Report which showed significant multi-agent contamination in 38 of the test bore holes, which is stated would be hazardous to the health of construction workers, residents and visitors and would require remediation works) and also contrary to the core development areas, the ADMP and policies GB1, GB4, GB5 and EN1, as this neither preserves nor enhances the Green Belt.”

62. April 2021 Consultation: No further comments received.

63. Badgers Mount Parish Council:

64. July 2020 Consultation:

65. Objection: “Badgers Mount Parish Council welcomes the reduction of the number of dwellings from 750 to 635 but we wish to see a further reduction because we believe that the infrastructure still cannot handle so many dwellings without major improvements. We still believe that the density is much too high for what is essentially a rural village, and is far higher than any other villages in the area. We are disappointed that there is only a safeguarded area for a primary school rather than an actual school as most villages of a similar size have their own school and without one primary school age children will have to be transported out of their village.

The remainder of our objection dated 21st November 2019 still stands.”

66. March 2021 Consultation: No further comments received.

67. April 2021 Consultation: No further comments received.

68. Halstead Parish Council

69. July 2020 Consultation:

70. “Halstead Parish Council continues to have concerns about this application and our previous response of November 2019 still stands. In addition, we have a number of further comments to be added:

1. CoVid-19 impact on the application

“The Covid 19 -pandemic is a wake-up call - the way we live is neither sustainable nor fair” Sustrans “Now is the time for the Government to be bold and ambitious for the future”

This application was amended before lockdown and now there are several factors that should be taken into consideration that are being widely discussed across the UK and will influence the way we all live in years to come. Naturally, the pandemic will have a profound effect on the way we live and the way we work, plus a direct impact on the feasibility of such large-scale developments from a financial perspective.

2. This is an increase in houses, not a decrease. This amended proposal suggests the amendment is to reduce from 750 houses to 635. 750 houses have not been granted only 450 in the extant planning application of 2015. 635 new houses represent a 41% increase on the original approved application figure of 450 houses.

3. Proposed density is too high.

The density of the surrounding parish of Halstead in which Fort Halstead exists is 15-18DPH. Density suggestions of between 25-50DPH are too high and will have a significant impact on the surrounding areas, both on the infrastructure, the community and the landscape.

Fort Halstead is on Green Belt and AONB land and its special qualities must be respected. The council considers the increase in density to be inappropriate and is in total conflict with the NPPF which suggest that development within any AONB ‘should be limited in scale and extent’. This proposal continues to disregard that fact.

We also know we are a fast-moving environment after CoVid-19 and that a number of employers are rethinking their strategy on home-working. This would imply that houses will need more space to enable that homeworking. A reduced density will allow for an increase in size. We have seen previous developments in our village being restricted by covenants that say they cannot build sheds or offices within their back gardens - if similar covenants are imposed on Fort Halstead then there will be little option for new residents than to compromise their work/life balance.

4. Highlight and mitigate contamination concerns.

The residents of Halstead have strong links to this site as a place of employment and are well-aware of the activities that have taken place here across the past 350 years using dangerous materials. Residents of Halstead still recollect the perceived effects of work undertaken at the Fort including an increase in sudden childhood deaths and an increase in cancer diagnosis amongst residents. Whilst we understand that independent inspections of this site have taken place and plans are in place to mitigate any issues uncovered, we feel it is the responsibility of Sevenoaks District Council and the

developers to address the issues directly with language that is easily accessible to all. The technical documents provided make little sense to the majority and all parties must understand that this issue is of highest concern with the local community.

5. An Employment led application that promotes commuting?

The amended report indicates buses will be organised to take commuters to Knockholt Station. The increase in commercial space is not justified if the working population are to commute elsewhere. The original outline application was granted under the assumption it was employment led. Once again, we see a development being proposed that does not look to fulfil the housing requirements of Sevenoaks but for London and commuters to the city.

Current employers of the site - QinetiQ - plan to remain. It is stated in paragraph 2.15 of the Planning Statement Addendum that their plans for the future will include, “explosive testing/research, small scale, low volume explosives manufacture and storage of explosives, as happen at present. It seems unacceptable that a development of this magnitude should be allowed in the close vicinity of these practices. Previous residential areas have all been outside the perimeter and secured utilising Fort Police. Is there a plan moving forward which mitigates the risk of families, with their children and inquisitive young people, living near a company that carries out such practices?

6. Transport concerns

Cycle paths- SDC need to publicise their ambitions for more cycle ways throughout the Sevenoaks District given that there has been a call for more cycle ways for many years. This is now highlighted by the Covid-19 experience and the desire of both locals and visitors to use bikes. The planners have put quite an emphasis on the use of bikes and have suggested quite a few cycle tracks. Some of them are feasible; there are others that involve the use of local lanes that would need reviewing. SDC need an overall plan for much more cycling in response to the Covid-19 pandemic, climate change and other matters.

SDC cycleways should link with the cycleways proposed at Fort Halstead to enable the future employees to travel safely from Sevenoaks, London and all areas in between. This will need dramatic and expensive action to which CBRE must contribute if they are to live up to their claims of sustainable travel.

Buses- CBRE know the 402 has been withdrawn and replaced with route 3. (At present suspended and replaced with GO! Travel). At this early stage it is not clear of the exact intentions regarding services, frequency and destinations. If the developer wishes to keep people out of their cars, the level of service must increase. One bus every 2hrs is of no use. It puts people off using buses. CBRE talk of a bus turn round area off Star Hill where the children could be dropped off, do they know the buses are already full? Children getting off the bus will be picked up by car, particularly the younger ones, where will Parent/Carers park and turn round?

The updated transport assessment 8.3.7 indicates the school bus will not be required if ALL CHILDREN attend the new school. Parents have choice and they decide which school to send their children to for a variety of reasons, not necessarily the nearest. What about transport for the Secondary School children?

Traffic- It is impossible to accept that traffic will not increase given that the commercial area will employ over one thousand people and add into that 450 - 635 homes.

7. Ongoing concerns about water supply

The water quality within the site is so poor that residents are often without drinking water due to unknown sources of contamination. Residents spent 37 weeks without drinking water in 2018, more than 5 weeks in 2019 and 2 more periods already in 2020.

20 November 2019 from DSTL:

"We are pleased to confirm that all remedial work to the water distribution system has successfully been completed. We are now in a position to confirm that the water samples taken have passed. We appreciate that the residents have been significantly inconvenienced, therefore please thank them for their patience at this time."

There is still yet to be confirmation as to who will provided water for the new development and what impact a new development will bring to a current over complicated system; which requires residents to flush through their properties on a regular basis.

In the latest application, the developers are repeating what they said in the last application, which is that the demand for drinking water is not anticipated to be any higher than the current usage. The technical nature of the language used makes it unclear to the layman if there is sensible justification for this assessment, but it seems highly unlikely that the construction of 635 homes will result in anything but an increase in demand.

The Water Resources and Flood Risk document (018N - VOLUME 2) states that: Confirmation will also be sought from Thames Water to ascertain whether their existing infrastructure is sufficient to supply the proposed development, with any necessary off-site reinforcement works being undertaken as part of the construction phase.

The response from Thames water to the first submission of this application was that there is an inability of the existing water network infrastructure to accommodate the needs of this development.

8. Finance - As mentioned, we would like to be assured that the financial feasibility study will be re-evaluated post pandemic. It would be all too convenient for the impact of Covid-19 to many of the non-profitable aspects of the development get pushed to the wayside. We note that in the appraisal results within the executive summary are already edging towards removal of affordable housing.

9. Impact on the Green Belt- Halstead Parish Council believe that this proposal should be considered unacceptable development in the Green Belt. We understand that SDC consider this site a Major Development Site and as such afford it lesser protection than the surrounding Green Belt areas but the Green Belt SPD still is clear that the development should have no greater impact than the existing development on the openness of the Green Belt and not exceed the height of the existing buildings. We can see that the majority of existing buildings are up to 6m from the ridgeline, with some up to 9m and only single buildings go higher. We would argue that it is against the spirit of the SPD and indeed the NPPF to take the heights of those small amount of higher buildings and apply that height as the standard across the site. We see that the majority of the proposed site contains heights of up to and over 12.5m which we feel will have a significant impact on the openness of the Green Belt which can be seen for miles across the District.

10. What about current occupants of Fort Halstead? - Residents of the current residential area of Fort Halstead have been left wondering what happens to them once the proposed development is completed. There seems to be no specific mention of how they will be integrated into the new estate. If this is not to be by including the current roads in plans for infrastructure, then how does it affect the payments made by the current resident to upkeep the roads and the water supply specifically.

A specific plan showing the integration of the existing properties into the overall development is essential. Failure to provide this will frustrate the harmonious future for all residents.”

71. March 2021 Consultation:

72. “Halstead Parish Council object to this application. The amendments go no way to fix the issues raised in our previous application and therefore we continue to object to this application on the same grounds as our response from July 2020. The points below summarise our concerns.

Density- This application sees a 41% increase in dwellings from the extant planning permission with a density of 25-50DPH which is significantly higher than the surrounding area and village.

AONB and Green Belt- The NPPF asks for development within the AONB to be limited in scale and extent. This proposal disregards that fact.

Contamination concerns- This council would still like to see easily digestible and independent reports of concerns that our residents have in regard to contamination of the site.

An employment led site?- The extant planning permissions were granted on the idea that this is an employment led site. Yet we see a large proportion of that original employment has been removed.

Transport concerns- We find a lack of sensible proposals for cycle paths and public transport options. We still find it impossible to accept that the traffic will not increase given the commercial aspects and the number of homes.

Water supply- We still have concerns over water supply. We have heard anecdotally that this fears will be allayed but have yet to see evidence.

Financial feasibility - Affordable housing is not optional. We would like for SDC to ensure that development of affordable housing goes ahead. We are well too aware of how the financial feasibility of promises becomes disposable once building starts.

Impact on the Green Belt- Halstead Parish Council believe that this proposal should be considered unacceptable development in the Green Belt.

Current residents - We still wait to see what the impact on current residents will be once the proposed development is complete. They currently pay for road upkeep and have a shockingly bad water supply and it would be kind for the developers to show compassion and integrate these residents into the new development through open communication.”

73. April 2021 Consultation:

74. “We note the further amendments, but unfortunately, they fail to address any of the major concerns stated in our detailed response on 12th April 2021 so we therefore reiterate our strong objection to this application.”

75. Dunton Green Parish Council

76. July 2020 Consultation:

77. Objection: “Dunton Green Parish Council continues to have concerns about this application. The concerns that the Parish Council has regarding the November 2019 version of this application remain (and are listed below for reference).

The reduction in the proposed number of dwellings is largely welcomed but the revised number of 635 homes still represents a significant increase to the 450 homes that have been previously approved. There is a continuous thread of argument for the development in the revised documentation using the fact that the number of dwellings in the revised application is reduced and therefore represents an improvement.

Allegedly this addresses several the concerns raised in 2019, in so far as it reduces the impact of the development on the Green Belt and on the AONB. However, the reduction is only versus the 750 dwellings as proposed in the original guise of this application and it is not acknowledged that, overall, the revised application still represents an increase in residential development of 185 dwellings.

The application is also defensive about affordable housing: the inference being that with a reduced number of dwellings available, it might not be

economically viable to meet in full the 40% quota of social housing. In relation to the Local Plan, the total number of homes falls short of the Government's target figures. Even acknowledging that there can be debates about the credibility of the Government's figures ad infinitum, what is clear, and surely cannot be disputed, is that there is a definite need for affordable local housing. Social housing numbers should be non-negotiable.

The reduced density is welcomed although there is still plenty of room for further improvements in this area. Another central core of this proposal is that it is an employment led development and there has been a slight increase in the area set aside for commercial development.

However, the Covid-19 lockdown has forced many organisations to have their staff work from home and re-evaluate their ongoing needs for commercial premises. Arguably, the Sevenoaks District already has an over supply of commercial premises. From experience with the development of the West Kent Cold Storage site in Dunton Green, the need for commercial development (which was originally included within the application for Ryewood) was not proven and the space that had originally been earmarked for commercial use has subsequently been developed as additional residential units, over and above the number originally planned for the development.

What real evidence is there of demand for commercial development on the Fort Halstead site? And what guarantees would there be, should commercial development not be required, that this space would not then be turned over to the provision of more residential units?

It is stated in one of the documents that rather than the proposed 252 trees to be felled, the revisions will now only see the loss of 210 trees. Whilst this is a reduction it is still the loss of a significant number of trees and is not acceptable.

There is now a proposal for an area of land to be reserved for a school, but the developer is not able to realise the commissioning of a school. That is entirely at the behest of KCC who seem to have very little idea about what demand there is for schools, especially in light of the Local Plan being contested. The Section 106 Agreement for Dunton Green's Ryewood development promised many things that, ultimately, were not in the gift of the developer. A new medical centre was included in the DG proposal. The local Clinical Commissioning Group took the money having been unable to get a local surgery interested (and indicating that there was insufficient demand to make it viable). Money was set aside for education (and was given to KCC).

It can only be spent in a very limited geographical area and yet that money has not been spent as KCC says it is for expansion only and it is unprepared to commit until the Local Plan situation is resolved. This means that money that could have been used in Dunton Green is sitting in the coffers at KCC rather than providing any educational benefit to the local community. Surely it is better to refurbish and extend Dunton Green's existing school than leave it to languish in the hope that in a decade's time there will be a new school at Fort Halstead? Commercial space was also to be part of the Ryewood development. That area (and the proposed site for a medical centre) has

been used for additional residential dwellings instead. If the school site is not used for that purpose, will it become an area for more residential development?

Communal parking simply does NOT work. The lack of parking provision, from bitter experience on the Ryewood development in Dunton Green, creates serious ongoing issues. There are constant complaints about people parking in the wrong place, that there are insufficient parking spaces (indeed, many residents would have preferred the space that had been allocated for commercial development to be used for additional parking rather than more dwellings, such is the problem). And the issue has spilled out through the village, with Ryewood residents parking in other areas of the village and exacerbating pre-existing issues with lack of on road spaces. It is Dunton Green Parish Council's contention that whatever the recommended levels for parking, there should be dedicated parking spaces per bedroom per dwelling (so 2 beds, 2 spaces; 5 beds, 5 spaces), if parking is not to become an inherent unresolvable issue at Fort Halstead, should the development go ahead.

Bus routes: there is no evidence that provision of bus services is a solution to mitigate the number of vehicle journeys being undertaken from a development. And, realistically, they are difficult to sustain. Again, as the recent experience of Ryewood has given Dunton Green Parish Council, services are initially funded by the developer. The uptake is not what it needs to be to ensure that the new service is economically viable in the long run and the routes end up being unsustainable. Should the development go ahead, there must be an assurance that the construction traffic will not travel on the A224 through Dunton Green. The village already has to withstand diversions from the A21 and M25 and the impact of that traffic. There must be mitigation for Dunton Green in the future to deal with the additional journeys this will generate.”

78. March 2021 Consultation:
79. “Objections that DGPC has submitted to previous guises of this application remain valid and the Parish Council would like these to be considered. The Parish Council submitted objections on 24th July 2020 (and included within that response objections from 2019) - these are copied below: (above comments repeated)”
80. April 2021 Consultation: No further comments received.
81. Chevening Parish Council
82. July 2020 Consultation: No comments received.
83. March 2021 Consultation: No comments received.
84. April 2021 Consultation: No comments received.
85. Note: Objection raised in 2019 consultation on the basis of lack of supporting infrastructure for the number of homes.

86. Shoreham Parish Council

87. July 2020 Consultation:

88. "Shoreham Parish Council not feel adequate provision has been made in terms of objects to this development as it does infrastructure for a development of this size. Lack of infrastructure applied to the original application (SE/1500628/OUT) for 450 houses and is now even more applicable given the significant increase (from 450 - 635) in homes proposed for this hybrid development.

The previous application was employment lead, which this one does not appear to be, thus, apart from the people who will be living and working on the site, most people will inevitably be using a car to travel to and from work. This will lead to congestion on the surrounding roads, which are already at full capacity as well as an increase in the amount of air pollution in an area already very close to the M25.

The size of the proposed development dwarfs the surrounding villages of Shoreham, Knockholt and Halstead, Badgers Mount which are already inundated with weekend visitors, many of whom come by car. Shoreham Parish Council is constantly under pressure to solve these vehicular problems, which will surely become much worse if a development such as this is built on its doorstep.

The nearest station is Knockholt Station but this is not suitable as it has a limited timetable and can only be accessed from Fort Halstead by car. The Old London Road is already given over to parking for this station and this is now at full capacity. No changes are planned to be made to this station until 2045.

Additionally, we have concerns about the amount of water required to service this number of new homes. It is generally accepted that in the UK, each adult consumes an average of 146 litres of water a day. Thus a 'household' consisting of two adults and two children, can be estimated to consume 438 litres a day. The additional 635 homes proposed for Fort Halstead will require an additional 278,000 litres of water, every day which equates to almost 2 million litres a week.

Unless Thames Water can provide an alternative source for this supply, it will all come from the aquifer supplying our region with severe consequences.

Provision has been made for a new primary school but this does not consider the fact that residents from elsewhere may choose to send their children to this school, causing a further increase to the traffic problem. Furthermore, residents of the new development may elect to send their children to one of the undersubscribed schools in neighbouring villages, causing yet more daily car journeys.

A medical centre is planned for the new development and whilst this is welcomed it does by no means mean that there will be GPs who wish to run

the practice (as was the case at Dunton Green). This could lead to the new centre not being built which would cause even more pressure existing services.

The application does not look at the whole area for which several other large applications have been submitted (Conway site, Broke Hill, Mumbai Central). In isolation, one of these developments may be sustainable, but if they are all approved, there will be a huge impact on the Green Belt, AONB and immediate area. A holistic approach must be taken and other applications considered when looking at this proposal. Due to its position at the top of the North Downs, this development will be seen from far and wide making it a blot on the landscape and having a detrimental effect on the views from the adjacent AONB. A development of this size and this proximity to the outer edges of London is a threat to the Green Belt. This, and other proposed developments in its vicinity, will cause neighbouring villages to be swallowed up in the urban sprawl. They will lose their identity and merge into one another as happened years ago with places such as Chislehurst, Farnborough and Sidcup, which have now become London suburbs. Development on this scale must not be permitted if we are to safeguard our countryside from encroachment.

We understand that SDC has not supported the proposed development of 1000 homes at Broke Hill. The Planning Inspector did not consider it to be in a sustainable location and should not therefore be granted planning. The Fort Halstead development is even further away from facilities and therefore the same should apply. We do not believe there are any exceptional circumstances for the building of such a large scale development in the Green Belt and for all the reasons above would urge SDC to refuse planning permission.”

89. March 2021 Consultation: No further comments received.

90. April 2021 Consultation: No further comments received.

Other Consultee Responses

91. Highways England

92. July 2020 Consultation:

93. “Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

94. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road

Network (SRN), in this case M25 Junction 4, including the spur to the Hewitt's Roundabout with the A21.

95. We are aware that there is a previous permission relating to the site (SE/15/00628/OUT) that may have recently expired and a Certificate of Lawfulness of Existing Use or Development (CLEUD) dating from 2004, both of which have been used by the applicant to argue that the current application should be compared to these permissible circumstances for the site. We are therefore writing to you for confirmation of what development could legally be permitted on the site at the present time. Your response will allow us to establish whether the base situations (against which the applicant's transport assessment has been compared) are acceptable and we can provide a considered response.
96. We hope that you find these comments helpful. We would be happy to meet with the applicant with a view to resolving these outstanding issues. This email does not constitute a formal recommendation from Highways England. SRN, and this has been agreed with the developer, we will provide you with our final formal response.
97. If, in the meantime, your authority wishes to determine the application, please let us know and we will provide you with a formal response based on the information available at that time.”
98. Following correspondence with the Case Officer in response to the questions raised:
99. “Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.
100. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case M25 Junction 4. However your email of 13 August confirming the current position regarding the extant permission for the site (15/00628/OUT) and the status of the Certificate of Lawful Existing Use. Compared to the extant permission and legal use, we are content that the amended application would not have any additional severe impacts upon the M25 Strategic Road Network. Our formal HEPR 16-01 response to this planning application is attached. If you have any queries regarding this response, please do not hesitate to contact us.”
101. March 2021 Consultation:
102. “Having reviewed the additional information, we note there are proposed amendments to the demolition plan, indicating the applicant intends to retain buildings X23, X47, X76 and X77 which were previously proposed to be

demolished, and now proposes the demolition of buildings X43.1 and X43.2. The applicants submitted cover letter states that the description of the DSTL Fort Halstead development is unaffected and that there is no change to the proposed floorspace of the planning application.

103. Based on this, we believe the amendments to the planning application would be unlikely to materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT C2/13 para 10 and MHCLG NPPF para 109). Therefore, Highways England's formal response of no objection dated 3 September 2020 is unchanged."
104. April 2021 Consultation:
105. "... Having reviewed the documents, it is considered these are minor amendments to the DSTL Fort Halstead development and there is no changed to the proposed floorspace of the planning application or changes to the number of proposed dwellings. Based on this, we believe the amendments would be unlikely to materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT C2/13 para 10 and MHCLG NPPF para 109). Therefore, Highways England's formal response of no objection dated 3 September 2020 is unchanged."
106. KCC Highway Authority
107. July 2020 Consultation:
108. "Planning permission (15/00628/OUT) was granted in 2015 for 27,000 sqm B1/B2 employment floorspace, 450 dwellings and a hotel. The most recent amendments to planning permission 19/05000/HYB see a reduction in the overall number of dwellings from an additional 300 to 185 (above the permitted 450 dwellings).
109. Transport Assessment - Questions have previously been raised regarding the Certificate of Lawfulness of Existing Use or Development (CLEUD), where clarification was sought regarding its validity. It is understood that the permission runs with the land, and until the use subsequently changes lawfully. The intensity of the existing use can change, and can stop for a period of time and be restarted as long as the use has not been abandoned. While a Certificate is not a planning permission, and providing that the use is materially the same, the intensity and nature of the use can change during its lifetime. The principle of a valid CLEUD means that the site could lawfully generate additional traffic to that currently experienced.
110. The CLEUD is the fall back position for the site, and certifies that the existing use is lawful. In terms of the traffic movements, the CLEUD is considered to generate more vehicle trips than the approved and proposed developments. The CLEUD for the site is for 82,168 sqm of employment space (66, 150 sqm B1 Use Class and 8,650 sqm B8 Use Class and the remainder as ancillary).
111. Outside of the site boundary are 72 dwellings, which utilise Crow Drive. The traffic generated from those dwellings has been subtracted from the traffic

surveys to provide an assessment of the application site.

112. The modification of security arrangements, including the removal of the gate at Star Hill, are understood to take place in the next two years. It is understood that in theory all traffic can use the Star Hill access point in two years. If the development is permitted, traffic calming will be provided along Star Hill and measures provided to reduce the use of the access.
113. Location Amenities - Para 2.4.6 outlines that it is anticipated that a higher proportion of secondary school children will attend schools in Sevenoaks due to the recently established Trinity and Weald of Kent Grammar Schools, located at the site of the former Wilderness School in Sevenoaks. A planning application has been approved for a Grammar School annex at the site. The schools can be accessed via service S34 from Polhill, which terminates at Knole Academy. Service S12 also provides access to Trinity School / Weald of Kent. It is assumed that the majority of secondary educated children would travel to Sevenoaks via public transport. Service R5/R10 is a circular route providing access to Orpington, whereby the closest bus stop is Knockholt Pound. There are a number of School bus services (S12, S31, S32, S33, S34, T3 and TW6) that pass the Star Hill Road access. A bus turning facility (roundabout) and stop within the site off Star Hill Road is proposed to enable existing school services to drop off and pick up school children travelling to secondary schools. A S106 Contribution towards school transport provision is likely to be required to ensure sufficient capacity is available on buses as the site is phased to full capacity.
114. Impact on Otford- The impacts of the development have been considered based on the full 635 units. In the AM peak there are 68 two way trips, and 63 two way trips in the PM peak. The impact of the additional 185 units, compared to the permitted 450 units, sees 14 two way trips in the AM and 13 two way trips in the PM peak. This equates to approximately 1 vehicle every 4 minutes in both peak periods and therefore not considered as a significant increase.
115. Site Accesses- Currently it is evident that access to the A224 / Crow Drive and Star Hill Road is currently only used in AM and PM peaks only. The existing barriers at Star Hill Road are expected to be removed in 2022, whereby public access would be unrestricted through the site. The Star Hill Road access requires visibility improvements, possible street lighting, and localised safety improvements.
116. The following improvements are proposed:
 - Improved visibility splays of 2.4 x 90 metres in both directions, which is in line with the approved outline application;
 - New warning signs on the northern and southern approaches to the junction;
 - The addition of anti-skid surfacing on Star Hill Road to assist vehicle stopping performance;
 - Tapers on the junction corner radii to help large vehicles to turn without overrunning the centreline of the major carriageway;
 - An enlarged splitter island to separate inbound and outbound movements by large vehicles to remove the potential for conflicts;

and

- Trimming back of foliage and raising of tree crowns to improve visibility splays in each direction;
- Best endeavours to reduce the speed limit on Star Hill Road to 40mph through a Traffic Regulation Order;
- Safety enhancements on Star Hill Road on the bend to the south east of the site access; Direction signing of the development site to and from A224 / Crow Drive.

117. Additionally improvements are required to the roundabout junction at A224/Crow Drive which was included as part of the approved permission (LPA reference 15/00628/OUT). The works should be provided prior to occupation. All improvements will be subject to a Section 278 Agreement. All improvements are to be completed prior to first occupation.

118. Pedestrian & Cycle Network - Pedestrian and cycle routes to and from the site have previously been raised as a concern. Access to Knockholt Pound is via Star Hill Road, whereby there is no dedicated footway or lighting. I consider that this needs addressing to ensure a safe route. Access to Halstead is via Otford Lane, along an unlit country lane. A cycle link is proposed to link the two accesses (Polhill and Star Hill Road). A walking / cycle way is proposed to run alongside PRow SR172, linking with Birchwood Lane enabling access towards Knockholt Pound. This has been discussed with KCC Public Rights of Way Team.

119. The following improvements are proposed:

- Existing bridleway between Polehill & Twitton - Lighting improvements at this location are proposed through a S106 contributions.
- London Road linking Otford Lane - provides links to existing on street cycle route at Old London Road, providing access to Knockholt Station - A Technical Note has been submitted to understand the feasibility of providing a 3.5 metres wide (two way) cycle way along the western edge of the carriageway. Several constraints have deemed such a cycle way unsuitable. Alternative measures include 'Orca' lane separate devices, but guidance suggests that these are only suitable on low speed roads. The TN suggests that the majority of accidents involving cyclists took place off peak, suggests sports cyclists as opposed to commuters. To make this an attractive cycle route, alternative measures to improve safety need to be investigated.
- Provision of cycle hubs (including e-bikes) and car clubs.

120. Public Transport Network

The applicant acknowledges that the site is currently poorly connected to public transport services and facilities. As previously noted, new and enhanced facilities and services are required in order that the site can be accessed by all modes of transport. The majority of people commuting to central London are likely to drive to one of the local stations due to the lack of adequate public transport and long walking distances.

121. Knockholt station is within TfL fare zones, which means the costs of tickets are significantly cheaper. Parking at Knockholt station is £3.50 per day with

supplementary on street parking available. The 2015 parking has been updated in February 2020 to observe parking availability at Knockholt station, along London Road and Old London Road. The survey indicates that during peak hours, the majority of parking at the station and along London Road are occupied. This indicates that these cars are commuters, whereby sustainable options for services to the train station are required.

122. Additional cycle parking by way of a cycle hub has recently been provided at Knockholt railway station by South Eastern. The capacity of the hub will need to be checked to ensure that there is adequate capacity for the additional cycle parking. The existing DSTL bus provides a free of charge shuttle bus service that is utilised by 60 staff per day. The proposed site shuttle bus to Knockholt station is proposed to be priced at £4.00 per day. This exceeds the current parking at the station. Therefore, discussions are required with Sevenoaks District Council regarding parking charges and whether these may be increased to make the bus service a more attractive option.
123. Bus service 3 (formerly 431) runs between Orpington and Sevenoaks, via Star Hill Road and Knockholt station, providing 3-4 services during the day Monday - Friday. This is not sufficient a service for the proposed development. Therefore, a Demand Responsive Transport (DRT) is proposed with two minibuses running between the station, schools and local facilities. The service is expected to reach viability at the end of the 10 year build period. In order to achieve maximum viability, it accepted that all bus contributions should focus on the DRT service. Consideration should be given to the provision of a weekend service. The existing service number 3 will be able to marginally divert into the site at Star Hill Road, turning to exit at the proposed roundabout. Exact details will be required as to the funding and contributions required over the 10 year period.
124. Details of the drop off points at the station will be required. The infrastructure at the station will need to be considered as to the ability for services to turn / drop passengers off safely. It is proposed that the various school bus services will be able to pull into the site at the Star Hill Road access, where a stop and roundabout facility will enable buses to enter the site.
125. Confirmation that this is acceptable to the bus providers is required. Details of the bus services are to be submitted, timing (prior to occupation) and triggers will be outlined in the S106.
126. Local Highway Network- Baseline traffic flows have been utilised from 2018, which appears reasonable given that the original application was submitted in 2019. When older data has been utilised, this has been scaled up with growth traffic factors derived from TEMPRO.
127. Personal Injury Collisions
Star Hill Road / Morants Court Roundabout - the applicant deems that while accidents have involved cyclists, this is not to be a main cycle route for the proposal. As such no improvements are proposed.

128. Star Hill Road / Birchwood Road / Old London Road - two of the recorded accidents appear to be speed related. Safety improvements are proposed along Star Hill Road, which will be subject to a S278 Agreement.
129. Polhill Road / Otford Road - the applicant outlines that all accidents appear to be associated with loss of control or drivers not paying attention. If this has taken place on a number of occasions, measures may be required.
130. Main Road / Harrow Road / Chevening Lane - no accidents occurred at the junction within the record period.
131. Shacklands roundabout - The TA outlines that the local highway network in the vicinity of the site is used by amateur cycle groups, which appears as a factor in the high number of crashes. Despite the cyclists involved appearing not to be commuters, I maintain that additional measures should be considered following the development to ensure cyclist safety in the future.
132. This could be in the form of signage and consider this an important safety feature and should be subject to an appropriate Condition.
133. Development Proposals
The proposal seeks a development of up to 635 dwellings (an additional 185 to the permitted 450), 27,773 sqm of B1a/b/c floorspace, mixed use village centre, and change of use of the Fort to provide a Historic Interpretation Centre (Use Class D1). Land is safeguarded for the development of a one form entry primary school. The previously submitted application included a school, but now that the number of dwellings has been reduced this is below the threshold for a primary school. In terms of vehicle movements and trips, this is one of the key factors that needs to be considered whereby more trips will be made to take primary age children to school. Without a dedicated school bus, I am uncertain of the patronage of a community bus for school children.
134. The primary access is via Crow Drive and A224 Polhill to the north of the site, with a secondary access from Star Hill Road. As the main route is a bus route, the road is designed at 6.75 metres in width. This is acceptable and a point we have negotiated for some time.
135. For development of this scale, two access points are required. It is important to note that the highway authority would recommend refusal if only one access were proposed. Two points of access has safety implications and provides highway resilience if an incident were to take place at main access. A package of Section 278 improvements are proposed at Star Hill Road that were not included in the previous outline application.
136. In line with the above, to minimise the use of the Star Hill Road access, measures have been taken including:
 - Locating the commercial development orientated towards Polhill access;
 - The design of the route to Star Hill Road is more convoluted making it less desirable,
 - Part of Crow Drive is to be pedestrianised, removing a direct through route.

137. I also suggest that white lining /hatching improvements are provided at Morants Court cottages on Star Hill Road.
138. The internal highway network has been designed for a 20mph zone, which includes a number of traffic calming features. During extensive discussions, the concept of the features have been agreed in principle, with details to be agreed at the design stage. The 'square about' features have now been modified to a 'square' junction, where we have other successful examples of such a feature.
139. Parking Provision
Parking provision and layout is to be agreed at detailed design stage. Comments have been previously provided regarding indicative parking layouts, which can be discussed as the application progresses.
140. Highway Mitigation
141. Star Hill Road
Visibility splays are proposed 2.4 metres x 90 metres in both directions. Vegetation is to be cut back in both directions to improve visibility. If the Traffic Regulation Order (TRO) be sought to change the speed limit to 40mph. The would be subject to best endeavours, as a third party application is subject to a public consultation exercise.
Warning signs on the approach to the junction in both directions,
Antiskid surface to assist vehicle stopping,
Tapers on the junction radii will ensure larger vehicles do not overrun the centre of the major carriageway,
An enlarged splitter island is proposed to separate inbound and outbound movements by large vehicles.
I suggest white lining /hatching improvements are provided at Morants Court cottages on Star Hill Road.
142. Otford Lane / A224 Junction
A roundabout is proposed which is considered acceptable subject to detailed design.
143. Star Hill Road / Rushmore Hill
Periodic monitoring of traffic flows is proposed, which is accepted.
144. Old London Road / Knockholt Station
A TRO to prevent parking would be subject to best endeavours, as a third party application is subject to a public consultation exercise. This is to provide a safer cycle route to the station, as currently cars block the route by parking on the advisory cycle lane.
145. Trip Generation & Distribution
The worst case scenario 'without' school has been assessed, which is accepted as there is uncertainty about the deliverability of the primary school. The modal split has been applied, however only car / van mode of travel to work has been used to account for the impact on the highway network. According to census data, other modes of transport will have a

negligible impact on the number of trips. The exception is train travel for commuters, which would take place outside the morning and evening peak hours.

146. A 1.25 minutes time penalty has been added to the routing for the Star Hill Road access due to the proposed road alignment and traffic calming features. Para 5.6.8 outlines that the Polhill access would be utilised more due to the roundabout, as opposed to a propriety T junction at Star Hill. This is explained as more desirable as a roundabout is typically faster to join as all approaching traffic is travelling slowly. The time penalty sees a decrease from 269 to 135 two way trip in the AM peak and 257 to 126 two way trips in the PM peak.
147. Table 5-15 and 5-16 have been produced to illustrate the difference between CLEUD traffic and the proposed worst case development on key links and junctions. The general trend suggests that the AM peak sees a reduction in vehicle trips comparing the proposed development and the CLEUD. In the PM peak there is a small increase in trips. As the CLEUD is valid and current use, I acknowledge that the site has the potential to generate a comparable number of vehicle trips. The CLEUD would generate a greater number of trips at Star Hill Road, compared to the proposed development. This is bearing in mind that the security measures are to be removed by 2022, and the route being devoid of traffic calming features. Trip generation assessment outlines two way traffic flows at Star Hill forecast at 135 trips during the AM peak (decrease from 145) and 252 during the PM peak (increase from 175), as compared to the 2015 Outlines Planning Permission (OPP).
148. Below indicates the net difference in AM and PM peak trips between the CLEUD traffic and the proposed development at Star Hill Road Junction.

AM Peak			PM Peak		
CLEUD	Development	Net Difference	CLEUD	Development	Net Difference
306	135	171	236	252	-16

149. Highway Impact Assessment
Highway impact assessments have been undertaken for 2035 future forecast year, in line the Sevenoaks Local Plan period. West Kent Cold Store development and the consented OPP for 450 dwellings are included as net development flows.
150. Table 6-1 outlines the percentage impact during the AM and PM peaks at 2035 baseline and with the proposed development. Of note, Star Hill Road (south of access) sees an increase of 15.3% in the AM peak and 14.1% in the PM peak. It is evident that this is the greatest percentage increase. However, with a low baseline traffic flow, the increase sees an additional 2 / 3 vehicle movements per minute in the peak hours. As such this would not give rise to an adverse impact to capacity. Junctions expected to operate within capacity

in 2035 with development include: Shacklands Roundabout; A224 Polhill/Otford Lane; A224 Polhill/A224 Otford Lane/Crow Drive/A224 London road - agreed roundabout scheme; Morants Court Road Roundabout; Star Hill Road/site access; Hewitts roundabout - the junction is expected to operate over capacity however the 2035 with development scenario is no worse than the 2035 future base scenario.

151. A224 Polhill/Pilgrims Way west link road - The junction is expected to operate over capacity in the AM peak however the 2035 with development scenario is no worse than the 2035 future base scenario.
152. M25 Junction 4 - The results show that capacity queues and delays will be worse in the 2035 with development scenario when compared to the 2035 base scenario. As this is a motorway junction advice should be sought from Highways England.
153. M25/A25/A21 Junction - Para 6.4.42 is showing the following error at various points. Therefore, I am not able to clarify what is being represented in the text and clarification is required.
154. The Westerham Road arm of the junction is expected to be over capacity in the future year and the addition of the development traffic worsens the situation. Mitigation measures should be considered.
155. Construction Impacts
A Construction Management Plan should be secured by way of a Condition, which I accepted. As previously noted, this should encompass each phase of demolition and construction, and be submitted and approved prior to any works commencing. This should include details such as routing of vehicles, employee parking, delivery vehicle unloading and turning, wheel washing, and any requirements for traffic management. No construction traffic should be permitted to use the Star Hill Road access.
156. Sustainable Transport Strategy
Knockholt Pound linking the centre of the site to Birchwood Lane - a walk/cycleway that sits alongside PRow SR172.
157. Stopping cars parking across the cycle route on Old London Road - Double yellow lines may be implemented along sections of Old London Road to ensure the cycle route is kept clear from parked cars. This matter would be dealt with through a TRO process following grant of planning permission.
158. Off road cycle route between Polhill & Knockholt Station - A separate feasibility study has been undertaken outlining that the cycle way between the site and Knockholt station is constrained.
159. The applicant has agreed to provide an advisory cycle lane on the A224 to link Otford Lane and the existing advisory cycle lane. The route along Old London Road is via an advisory cycle lane. Additional signage is suggested to provide awareness of cyclists. An advisory cycle lane is by way of signage as opposed to a segregated cycle lane.

160. Cycle facilities - provision of cycle parking facilities on site and a cycle hire scheme in association with Enterprise, a sustainable transport initiatives provider. Increased cycle parking should also be provided at Knockholt station, subject to the requirements of Southeastern due to recent cycle hub upgrades.
161. Bus Services - diversion of Service 3 (formerly 431) into the site, and a Demand Responsive Transport (DRT) service. The DRT service is proposed to consist of two minibuses operating Monday to Friday, linking to local stations for commuters and providing a demand responsive flexible service during the off peak period. Further details will be provided at detailed design which should be outlined by way of a suitable Condition.
162. Para 8.3.6 outlines that the DRT service will provide links to local primary schools. While it may not be unreasonable for primary age children to take a bus to school, I fail to see how parents would allow young children to travel on a bus that is not dedicated to children alone. The paragraph further notes that the buses used for school children would only be available for passengers related to the school. This appears to warrant a need for a number of additional bus services aside from the stand alone DRT service which as I understand would operate during peak (school drop off) hours). I acknowledge that the station commuter service may be prior to the peak. Further details and clarification is required.
163. Unless the number of residential units is increased, KCC Education may not warrant a primary school necessary on the site. An overall Bus Management Plan should be considered as a Condition prior to the commencement of any service to outline how the demand will be monitored and any changes agreed. Funding of the bus service, and the appropriate level of occupation trigger requires agreement and securing by S106.
164. Travel Plan
A comprehensive Travel Plan is required to reduce dependency on the private car, and must include objectives and modal split targets, a programme of implementation and provision for monitoring, review and improvement. The primary school element needs to be removed from the Travel Plan as this is not secured.
165. Measures include: Realistic alternatives to the private car, including new DRT serviced, and diversion of service 3 into the site. Parking Management Strategy and cycle parking. Appointment of a Travel Plan Coordinator. Monitoring fees of £2,844 (£1,422 for 5,000sqm+ B1 b and c + £1,422 400 or more homes) Further consideration should be given to providing robust measures including car clubs, electric bike hire and cycle parking at Knockholt station.
166. In line with the above, subject to the inclusion of the issues raised relating to Conditions and the completion of a Section 106 Agreement, the Highway Authority raised no objection to this application on highway grounds.”
167. Additional comments, following the submission of material by the applicant in response to the above comments:

168. "Stantec have provided a technical note to address points raised in our consultation response. I have attached the note for ease of reference.
169. DRT and Bus Turning
It has been agreed that a Saturday bus service will be trialled, commencing at 50th occupation and reviewed two months after the 100th occupation.
170. The submitted Bus Report outlines that the DRT service will provide a service for commuters until 8am, where after it will provide a school service. Questions have previously been raised as to the feasibility of young primary age children utilising the service. The applicant outlines that they see it as feasible that primary age children over the age of 7 could utilise the service without parental supervision. The service would be dedicated to school children, not open to the general public at this time, to ensure children's safety. A form of walking bus to chaperone children may be appropriate.
171. The above matters will be subject to an appropriate condition of S106 provisions. The previously agreed condition will need amending to include Saturday operation for the trial period. The first DRT bus is proposed to be introduced at first occupation, with a second bus introduced in year 3.
172. The DRT operation would require funding support of £875k during the development build out and an ongoing £27k per year thereafter. It is considered that this may be able to be financed as part of residents' / business service charged. To be determined.
173. A bus turning loop is proposed within the Star Hill Road access. As such, no further financial contributions are proposed for secondary school services.
174. During DRT commuter services, it is anticipated that the service will stop at Knockholt train station only. In lieu of a dedicated turning area, the applicant has suggested a route utilising Wheatsheaf Hill and A21 in an anticlockwise direction. This would add approximately 2 minutes to any journey, and would enable use of the bus stop east of the station approach.
175. Go-Coach currently operate services S31, S33 and T3 along Star Hill Road. The operator has been consulted on the suitability of the proposed turning loop within the Star Hill Road access. Go-Coach are satisfied with the proposal.
176. The turning loop is to be provided prior to first occupation, on completion of the Crow Drive / Star Hill Road junction works.
177. Shacklands Roundabout- Additional road signage to be provided on the approach to Shacklands roundabout and London Road between the site and Knockholt Station. This will warn drivers of the presence of cyclists along the route, particularly at junctions. This should be secured by way of a suitable Condition.
178. Pedestrian Route to Knockholt Pound
A pedestrian / cycle route linking Knockholt Pound via Birchwood Lane is

confirmed, which will be alongside the existing alignment of PROW SR172. This should be secured by way of a suitable Condition.

179. Otford Highway Impacts

Anticipated trips through Otford from the 185 units would see 14 two way trips in the AM and 13 two way trips in the PM peaks. This equates to approximately 1 vehicle every 4 minutes during the peak hours. This has been previously outlined in the TA.

180. Travel Plan

It is confirmed that a full Travel Plan (secured by condition plus KCC agreed monitoring fee), will include details of car club provisions, cycle facilities and other measures to be implemented prior to first occupation.

181. Contributions & Obligations

The TRO for Star Hill Road should be a condition subject to ‘best endeavours’ as opposed to an informative. An informative does not provide an obligation for the TRO. Assuming that construction vehicles would be utilising the Star Hill Road access, I suggest that the TRO process should be commenced at least 3 months prior to the start of construction.”

182. March 2021 Consultation: No response received.

183. April 2021 Consultation:

184. “It would appear that there have been no changes to the highway details since my previous response dated 29th October 2020. My previous comments therefore stand.”

185. Following further consideration of the submitted detailed plans of the access, concerns were raised in respect of the details of the Star Hill Road junction and amendments requested in respect of: calculations for visibility splays; confirmation that the gradient had been taken into account; query regarding loss of trees and comment that the visibility splays are based on existing traffic speeds. This is addressed within the report.

186. KCC Public Right of Way Officer

187. July 2020 Consultation:

188. “Thank you for the opportunity to comment on the above mentioned application. Further to our previous response (Letter dated: 13 November 2019, Reference: 92553), the applicant has engaged with the Kent County Council (KCC) Public Rights of Way (PRoW) and Access Service. While this engagement was welcomed, the amended plans have not resolved the issues previously raised. With reference to the enclosed georeferenced map, we have outstanding concerns that need to be addressed. The existence of the PRoW is a material consideration.

189. Impact on Public Footpath SR172

With reference to paragraph 3.23 of the ‘Planning Statement Addendum’, the applicant has stated that a ‘new permissive cycle way adjacent to footpath

SR172' will be established, providing 'a shared route for both pedestrians and cyclists to Knockholt'. We have concerns with this proposal as it is not clear how cyclists would be segregated from the existing Public Footpath. It is likely that cyclists would ride along the Public Footpath and cause a nuisance for pedestrians. Further, the promotion of a permissive cycle route along the public right of way would create ambiguity with respect to the future maintenance of the route and potential liability issues.

190. While the creation of new off-road cycle access is strongly supported by the County Council, the approach to delivering cycle access along Public Footpath SR172 needs to be reconsidered. With reference to our previous response, the footpath could be converted to a cycle track, but we would request that the route is upgraded to a Public Bridleway, so that it can be used by cyclists and equestrians. This could be achieved through a Creation Order (Highways Act 1980 Section 25), whereby the applicant dedicates higher access rights along Public Footpath SR172.
191. Disappointingly, the applicant has not considered the onward connectivity of this cycle route beyond the site boundary. The plans show that cyclists would be forced to cycle along the Old London Road, sharing the carriageway with vehicles. It is requested that the applicant considers off site improvements that would improve accessibility for cyclists and encourage active travel towards Knockholt Pound.
192. Impact on Public Footpath SR97
This right of way could provide significant opportunities for outdoor leisure and recreation, but there are long-term issues preventing public use along this footpath, with fallen trees and overgrown vegetation obstructing the definitive alignment of the route. Considering this right of way passes along land within the ownership of the applicant, steps should be taken to address these obstruction issues and improve the character of the route, so that its access potential can be maximised. It is requested that the path is reinstated along its recorded alignment and the surface is improved to provide good accessibility for the public. Improvements to the off-site sections of the path could be delivered by the County Council using a S106 financial contribution.
193. Impact on Public Footpath SR722
It is requested that new rights of access are dedicated along this route by the applicant. Upgrading the status of the path to a Public Bridleway would enable equestrians and cyclists to use the route. This would improve outdoor recreation opportunities for residents and enhance wider connectivity for Non-Motorised Users.
194. Impact on Public Footpath SR11
The previous plans included a new cycle route along this right of way, connecting the development site with Otford Lane. While we did not object to this proposal, we did request clarification on the process for delivering this cycle access, as the route is currently recorded as a public footpath and has stiles that restrict access. Reading the latest plans, it is not clear if the applicant still intends to create this new cycle route. To address this matter, it is requested that the applicant clarifies their intentions for this right of

way. While the creation of new cycle access is generally supported, the legal status of the route will need to be upgraded to facilitate cycling.

195. Wider Impacts on the PRow network

It is understood that the proposed number of dwellings for this development has been reduced, but the provision of 635 residential dwellings will still have a significant impact on the PRow network surrounding the site. Public use of these paths is expected to increase following the development, so it is imperative that these PRow are improved to a degree that they have a suitable surface and are clearly signed.

196. Significant improvements should be made to the existing PRow network, as these paths will increasingly serve as sustainable transport links and provide opportunities for outdoor recreation. It should be expected that the PRow within the development site boundary will be surfaced by the developer to an agreed specification of KCC's PRow and Access Service. Further, a developer contribution should be provided for KCC to deliver off-site improvements to PRow, in preparation for their predicted increase in use. From a sustainable transport perspective, the site location is likely to result in an increase in vehicular traffic movement, as the poor walking and cycling connections to the local village facilities are very challenging. Before the planning authority determines to approve this site, an agreeable resolution to the encouragement of sustainable access to schools and facilities must be found. The recommendation for the purposes of PRow network is that no less than an amount of £150,000 is provided to improve walking and cycling routes between the site and Knockholt, Halstead and Otford. The PRow and Access Service requests further discussion with the applicant to identify clarify specific path improvements.

197. North Downs Way

Concerns remain with the potential impacts of the development on a section of the NDW that currently passes along the B2211. Levels of vehicular traffic are likely to increase along this road following the development, which could introduce safety concerns and deter public use of the trail.

198. It is requested that the applicant explores the potential for re-aligning the North Downs Way along an alternative off-road path in the area, as mitigation for this predicted impact. A Section 106 developer contribution could be provided for the County Council to delivery off-site works that address this issue, including the creation of a new path and the provision of new road crossing infrastructure. The KCC PRow and Access Service would welcome discussions with the applicant to consider this matter further.

199. Open Access Land

Disappointingly, the applicant still has not highlighted an area of Open Access Land on their plans, as prescribed by the Countryside Rights of Way act 2000. On a positive note, the Illustrative Masterplan suggest that a linear path link may be provided along the northern perimeter of this Chalk grassland area, connected footpath SR722 with SR97. It is requested that the applicant clarifies the status of this new path link. This new route should be secured with a long-term permissive agreement or ideally be dedicated as a Public

Footpath, as this would secure the long-term sustainability and protection of the route.

200. Village Green

The plans still refer to the creation of a village green at the centre of the site. The applicant should confirm if they intend to formally dedicate this area as a Village Green or if this terminology has simply been used to highlight an area of open space. If the area is not going to be dedicated as a village green, the wording should be revised to avoid confusion.

201. Summary

While I am confident that the issues raised in this letter can be resolved, until plans have been put forward to consider these matters, I have no option than to place a holding objection at this time. The KCC PRoW and Access Service would welcome further engagement with the applicant to consider the matters highlighted in this response.

202. Finally, I should be grateful if you could bring the following to the applicant's attention: No furniture, fence, barrier or other structure may be erected on or across Public Rights of Way without the express consent of the Highway Authority; there must be no disturbance of the surface of the Public Rights of Way, or obstruction of its use, either during or following any approved development without the express consent of the Highway Authority; no hedging or shrubs should be planted within 1 metre of the edge of the Public Rights of Way; please also make sure that the applicant is made aware that any planning consent given confers no consent or right to close or divert any Public Rights of Way at any time without the express permission of the Highway Authority; No Traffic Regulation Orders will be granted by KCC for works that will permanently obstruct the route unless a diversion order has been made and confirmed. If the applicant needs to apply for a temporary traffic regulation order whilst works are undertaken, I would need six weeks notice to process this."

203. March 2021 Consultation:

204. "Thank you for the opportunity to comment on this amended application. However, following our original letter on 13th November 2019 and a meeting with the applicants agents on 27th February 2020 and my colleague, Mr Thomas Kennedy's, letter of 23rd July 2020 we are no closer to resolving the issues raised previously with regard to the public rights of way network and therefore while I am confident that the issues raised in this letter can be resolved, until plans have been put forward to consider these matters, I have no option than to continue to place a holding objection at this time. The KCC PRoW and Access Service would welcome further engagement with the applicant to consider the matters highlighted in the previous responses."

205. April 2021 Consultation:

206. "I would refer you to my colleague, Thomas Kennedy's comments of 23rd July 2020 which are still relevant and not been addressed in this amended consultation, despite several meetings with the agents.

207. The applicant has still not made clear the status of the indicative strategic and secondary shared footway/ cycleway and the Access and Movement Plan appears to show these footways/cycleways joining onto public footpaths. I would request that the applicant considered upgrading the footpaths within the ownership to bridleways which will enable the public to legally use them on bicycles and access them from these other routes shown in orange and in green dashed lines. Along with the legal process to upgrade the footpaths to bridleways, practical works to improve the surface to ensure it is suitable for cycling and horse riding could help mitigate the impact of such a large increase in local population who may seek to use these routes. A condition should be given requiring the applicant to consult with the Public Right of Way and Access Service to establish a specification for the surfacing of these routes and for the applicant to pay for the required legal and physical works or provide a Section 106 contribution to enable us to do so.
208. I note the Proposed Highway Layout- Star Hill fails to acknowledge the presence of public footpath SR172 which crosses this access road. There is no indication how a safe crossing will be provided for pedestrians. This needs to be considered and the plans updated to show how this will be achieved.
209. I would object to the plans as shown due to the lack of a safe crossing for users of public footpath SR172 on Star Hill and the lack of any contribution to improve the existing public rights of way network, through upgrading and improving surfacing on existing routes in mitigation for the increased projected usage due to the increase in number of residents.”
210. Historic England
211. July 2020 Consultation:
212. “Summary- The development will cause some harm to heritage significance, but will also bring considerable heritage benefits by securing a sustainable use for Fort Halstead. We therefore have no objections to the development and consider that it meets the requirements of the NPPF.
213. If you are minded to grant planning permission for the proposal, we recommend that a condition for an s.106 Agreement and a revised CMP is attached to any permission granted.
214. Where harm to historic buildings will occur provision should be made for recording and analysis to an agreed specification, and the curation of documentary archives in an appropriate and approved archive.
215. You should also consult the Kent County Council Heritage Conservation Team and your own specialist conservation advisors with regard to the treatment of undesignated buildings, structures and archaeological remains.
216. Where work is proposed within the scheduled monument a prior application for scheduled monument consent will be needed. We will

be pleased to offer further guidance and to advise about scheduled monument consent applications in due course.

217. The previous application

A variation of this proposal was last applied for in 2019, under planning reference 19/05000/HYB. Our consultation response (on 20 November 2019) raised some concerns about the proposed design of the village centre next to the scheduled Fort Halstead.

218. We were supportive of the plans to repair and re-purpose the Fort, but states that further detail would be required in respect to this aspect of the development. We therefore recommended that conditions for a Conservation Management Plan and an S.106 Agreement were attached to any permission granted.

219. The Current Application

The current application is for a slightly revised scheme to that applied for in 2019. The revisions include a reduction in the total amount of housing provided (635 houses down from 750 houses), and the safeguarding of land within the master-plan for a school. A revised CMP for the fort has also been submitted. The design of the village centre remains the same.

220. We do not have any concerns or comments with regards to the reduction in housing or the safeguarding of land for a school. Although we previously had concerns with the design of the village centre, we have since had the opportunity to make a site visit and have detailed discussions with the applicant's heritage consultants (RPS Heritage) about this aspect of the proposal; the results of which are accurately described by RPS Heritage within their Heritage Note.

221. Although the proposed village centre design will cause some harm to heritage significance, we consider that RPS Heritage has now convincingly demonstrated to us that this design has been carefully crafted in such a way that balances the need to respect heritage significance with that to create a new strong, vibrant and healthy community. It therefore seeks to pursue environmental social and economic objectives simultaneously; in order to create a truly sustainable development in line with the requirements of the NPPF (para. 8).

222. Kent County Council and your own specialist conservation officer will be your main advisors with regard to undesignated archaeological remains and unlisted structures, respectively, and we do not anticipate commenting in detail on these aspects of the application.

223. The Conservation Management Plan

A revised Conservation Management Plan was submitted with the application which sets out the vision for the future of the scheduled fort and what provision will be made for this as part of the overall development. We are encouraged to see that this document provides more detail and consideration of relevant issues than previous iterations. The understanding of the fort's history and significance in particular is very well-researched and presented within this revised plan.

224. The broad proposals presented within the CMP for the use of particular buildings within the fort represent a plausible approach to their conservation and sustainable use. However, we continue to think that the CMP does not yet provide the level of detail that will be required to be confident of a successful and viable future for the fort.
225. It does not yet adequately address detailed conservation objectives, the financial feasibility of a heritage interpretation centre, or detailed management and conservation issues; such as condition surveys, maintenance, repairs, landscaping, security, provision of facilities and interpretation, and the curation of documentary archives, which might all have an impact on the heritage significance of the place.
226. We are nevertheless content that this additional level of detail could be achieved by conditioning a revised Conservation Management Plan as part of any planning permission granted.
227. Section 106 Agreement
As noted within previous advice, we think that an s.106 agreement will also be essential to ensure that adequate provision for the future management of the fort will be made at key stages of the development process. An s.106 agreement will ensure that the proposed objectives for the fort's future repair, use and maintenance are properly managed and achieved in line with agreed timescales. It is also necessary to avoid the potential neglect of heritage significance in favour of other duties and unintended consequences (such as a right for future owners to buy property that is intended to provide revenue for management).
228. We think that an s.106 Agreement should be conditioned as part of any planning permission granted. We would be pleased to advise the applicant and the council on what further steps will be required to revise the Conservation Management Plan, and provide a satisfactory s.106 Agreement. We would be pleased to discuss the CMP and s.106 Agreement in more detail with your authority and the applicant, and welcome further discussion with both parties. However we do also provide some initial comments and recommendations regarding the CMP and s.106 Agreement within the attached appendix.
229. Recommendation
We do not object to the application on heritage grounds and consider that it meets the requirements of the NPPF.
230. We are pleased to see that the application includes provision for the repair, conversion and use of the scheduled monument into the future; however we think further detail and reassurances are required to ensure that these aims and objectives are achieved, and in line with agreed timescales.
231. We therefore recommend that, if you are minded to grant planning permission, this is granted with conditions for a revised Conservation Management Plan and a s.106 Agreement. We would welcome further

discussion with yourselves and the applicant with regard to this aspect of the development.

232. Finally, you should also consult the Kent County Council Heritage Conservation Team and your own specialist conservation advisors with regard to the treatment of undesignated buildings, structures and archaeological remains.”
233. March 2021 Consultation:
234. “On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.”
235. April 2021 Consultation:
236. “On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.”
237. SDC Conservation Officer
238. July 2020 Consultation:
239. “I’ve had a look at the significance of the buildings in the previous 2015 report and there are some changes I’d suggest.
240. Para 458 - Building Q14 and it’s immediate setting will be altered. In an amendment to this application, two of the contemporaneous surrounding structures (Q1 and Q12) that are considered to form an important part of its setting will be demolished. Q13 will be retained as per the previous scheme. The substantial demolition of the entire site will have a negative impact on the significance of all the designated heritage assets on the site because of the functional relationship and context. They have historic significance based on their role in weapons research and this role is intrinsically linked to the wider site. Q14, located outside of the Fort is part of a group of contemporary buildings and the impact of the demolition of the wider site will also have a visual impact on its setting. The development of the wider site was low level, organic and sporadic and was developed as a need arose. The loss of Q1, identified as a non-designated heritage asset and Q12 are considered to impact on the setting of the designated heritage asset. However, the masterplan has been developed in order to retain the elements that make the greatest contribution to the setting and also to create a vibrant, new sustainable community and a long term sustainable use for Fort Halstead. The wider development will also retain a similar use of weapons research, light industrial and housing. In terms of the NPPF it is considered to be of less than substantial harm.
241. My comments: The current application has been the subject of extensive pre-application discussions and the scheme has evolved to address the issues raised regarding the setting of the designated heritage assets and the non-designated heritage assets.

242. The extant character of the site represents an evolving military site. The history is wide-ranging and its activity is represented in the utilitarian materials, plain and also 'house' military architectural styles and the functional grid layout.
243. The site is being decommissioned and the principle of creating a mixed use development estate was established in the 2015 permission. Creating a publically accessible non-military site changes the character of the area but also allows for public access to the historic buildings previously not accessible. The scheme retains many other buildings adjacent to and in the vicinity of the designated assets, from a variety of eras, which help to demonstrate the evolution of the site and provide context to the Fort and the Penney Building.
244. The applicant has proposed a revised location for the village centre, adjacent to the Fort and this is welcomed. Efforts have been made connect the entrance to the Fort with the core buildings in this area. The location of a landmark building in the village centre helps to establish a sense of place and is welcomed. The building is adjacent to the Penney Building (listed) and across the road from the Fort (scheduled). Whilst the setting and use of the assets is altered and the redevelopment of the site changes the character from military and functional to residential, the need to create a sustainable and vibrant new community which is a public and economic benefit has been designed in a way to mitigate the harm to the heritage significance and given meaningful heritage benefits.
245. Particularly vulnerable is the Fort and the associated listed structures within, that lends itself less easily to reuse. The principle of reuse has been established but more considered detail needs to be submitted as to how this will be carried out.
246. The proposals are considered to cause less than substantial harm to the heritage significance of the site. In order to meet the requirements of the NPPF in terms of justifying harm and demonstrating the public benefit, the applicant has submitted a Conservation Management Plan for the site. However, as Historic England have detailed in their response, more work needs to be done to ensure that this document is financially viable and achievable. The guidance provided by the HE should be followed in the production of the detailed Conservation Management Plan and be included within the Section 106 agreement and with safeguards and milestones in place as suggested by Historic England's submission."
247. March 2021 Consultation: No response received.
248. April 2021 Consultation: No response received.
249. SDC Urban Design Officer
250. July 2020 Consultation:

251. “Thank you for the opportunity to comment on the revised proposals. The following comments follow up from the previous ones submitted on 9th December 2019 and take into consideration the proposed amendments.
252. It is noted that one of the key amendments proposes to reduce the number of homes to 635, from the previous proposal of 750 homes. The reduction of 115 homes will have an impact on the future social vibrancy of this community including the viability of the social infrastructure (the bus route and potential school) and supporting the economic viability of the proposed village centre.
253. Notwithstanding this concern, the proposed reduction in housing will be achieved by removing the housing on the helipad site and a reduction in density in the village mews character area. There is some concern about reducing the density at this location. The higher density and low rise typology that was previously proposed in the village mews was developed in response to comments from the design review panel (in 2019). This character area abuts the village centre and therefore a higher density is appropriate here. Furthermore, the proposed layout in this character area (specifically on the western side) fails to achieve the vision as stated on p34 of the Design Principles document ‘Village Mews forms the heart of the residential neighbourhood, sitting immediately to the north of the Village Centre. A series of intimate shared-surface streets lined with link-detached homes form a number of attractive routes for pedestrians and cyclists, while discouraging vehicles, creating a family friendly neighbourhood with easy access to the Green Link and other amenities.’ The introduction of the on-plot car parking typology that sits beyond the building line creates a less sympathetic approach to character of this neighbourhood. As a result, the streetscape would be dominated by parked cars; entrance to houses are set further back from the street creating less of a relationship to the public realm and there is a reduction of landscaping. The previous version of the street plan and section showed cars that were set back behind the building line which were less dominant in the streetscape; the building line came up to the street creating a stronger sense of enclosure and interest and rhythm in the built form; and the streetscape had landscaping that ran parallel to the street creating a much more attractive route for pedestrians and cyclists which would create a more responsive environment in order to create family friendly neighbourhoods as well as a more legible north-south route connecting the Green Link to/from the Village Centre.”
254. March 2021 Consultation: No response.
255. April 2021 Consultation: No response.
256. KCC Archaeology Officer
257. July 2020 Consultation:
258. “Thank you for the further consultation on the hybrid application for redevelopment of Fort Halstead including demolition of buildings, development of mixed-use development comprising business area, and associated works. I am sorry for the delay in providing comments but I hope they can still be considered. These comments refer to the current

consultation but my comments made on 9 December 2019 are still relevant.

259. My comments do not relate in detail to the Scheduled Monument of Fort Halstead because comments by Historic England and the District Conservation Officer would take precedent. I note the comments by Historic England for this current consultation and I fully support their comments. I note they are not entirely happy with the CMP and are keen to see revisions to the CMP and be consulted on the S106 Agreement covering the interpretation centre. Again I fully agree with their concerns.
260. In my previous letter I did state: “Although there are some heritage concerns, it may be that further assessment can be undertaken prior to detailed consents being determined on the outline part of the application site.” This is essentially still the case but I would like to express concern over the limited development of the approach to the historic environment.
261. Submission of this new revised scheme does not seem to have included development and enhancement of the consideration and mitigation for non-designated heritage assets.
262. The Heritage Note by RPS provides up dated assessment of the significance of the fort as a SAM. There seems to be no updated consideration of non-designated heritage assets in the wider complex. The focus is just on the fort and there has been no additional consideration of buried archaeology and archaeological landscapes. There may be some elements of both buried archaeology and archaeological landscapes which could be considered to be significant and mitigation would need to have capacity to accommodate significant non designated archaeology. This may include key archaeological landscape features which are above ground and are especially associated with the 20th century research establishment.
263. These assets are particularly vulnerable to initial stages of development including clearance and demolition. As such early consideration is essential. I have raised the concern regarding lack of consideration of the archaeological landscape of this site; meaning the 20th century fixtures and fittings, buried structures, spaces, non designated buildings, pipework, rifle ranges, specimen tree planting, avenues, etc, several times. And it is still not being sufficiently considered. Fort Halstead was a highly significant 20th century military research complex. The SAM fort was part of this complex but its use for the 20th century activities was restricted. The rest of the site contains highly significant non designated features which may be of equivalent importance to the SAM. As such this needs to be addressed in a Heritage Note.
264. The Archaeological DBA has not been updated and does not sufficiently address the 20th century archaeological landscape issues. The Non-technical Summary mentions consideration of Historic Environment but the Archaeology section only considers “buried remains” and the Built Heritage only considers buildings, not structures. There is no consideration of archaeological landscapes. The features within this archaeological landscape are very vulnerable and sufficient consideration is essential prior to demolition and landscaping works. This consideration is needed because there will be some

elements which can be preserved and conserved and integrated into the proposed development. This would address sustainability of the historic environment and address NPPF section 16, paragraph 185, which does encourage regard to “conservation and enjoyment of the historic environment”. This proposed development does offer a fantastic opportunity to utilise remnants of a rare and robust heritage resource of the 20th century research activities.

265. For this current proposed scheme, I note that Historic England are supportive of the scheme with some requirements regarding a revised CMP and need for a S106 Agreement on the Fort itself. As such I consider none of the archaeological and archaeological landscape issues form a major constraint on the proposed broad re-development. However, I would welcome greater consideration of archaeological landscape issues. I have recommended a specific condition regarding mitigation for archaeological landscapes but greater consideration at an early stage to prevent loss of key features during the demolition stage is essential.
266. If it is considered necessary to determine this outline application at this stage I recommend the following conditions are placed on any forthcoming consent: (conditions relating to a programme of built environment recording, archaeological impact assessment, archaeological field evaluation and archaeological landscape survey, protective fencing and a heritage interpretation strategy.)
267. In addition to these conditions, I recommend the need for a Conservation Management Plan for archaeological landscapes which would be used to preserve in situ significant elements of the archaeological landscape and for interpretation across the entire site. A CMP for archaeological landscapes should be compatible with the CMP for the fort SAM.
268. Mitigation measures should be put forward as part of the application and these should include long term conservation measures and identification of visionary interpretation. It may be considered appropriate to cover heritage interpretation issues as part of a S106 Agreement and I would be happy to discuss this further. I note no “visionary interpretation” has been submitted with this revised scheme and I suggest this should be part of the drafting of CMPs for heritage.”
269. March 2021 Consultation: No response received.
270. April 2021 Consultation: No response received.
271. SDC Tree Officer
272. July 2020 Consultation:
273. “My main concern after reading some of the new stuff was as before with the affects on the Ancient Woodlands. The much increased pedestrian traffic post development has the potential to cause harm to the flora of the site. I would therefore expect to see a woodland management scheme which could be conditioned. Such a scheme would be required to manage the routes through

the woods. Footpaths lead people, and ideally they should lead people away from sensitive areas such as where indicator plants are. Trees should be managed in a way that encourages fauna. Pre managed parts of the woodlands would require continual management over time. Possibly coppicing or where Coniferous plantation exists it could be replanted with suitable native deciduous species and suitable management of dominant species such as bramble, Holly etc. If feasible I would expect to see a suitable management scheme in place in perpetuity.”

274. March 2021 Consultation: No comments received.

275. April 2021 Consultation: No comments received.

276. Forestry Commission

277. July 2020 Consultation:

278. “Thank you for seeking the Forestry Commission's advice about the impacts that this application may have on Ancient Woodland. As a non-statutory consultee, the Forestry Commission is pleased to provide you with the attached information that may be helpful when you consider the application: Details of Government Policy relating to ancient woodland; Information on the importance and designation of ancient woodland.

279. Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover. It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "there are wholly exceptional reasons" and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 175).

280. We also particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland - plus supporting Assessment Guide and Case Decisions.

281. As a Non Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather we are including information on the potential impact that the proposed development would have on the ancient woodland.

282. One of the most important features of Ancient woodlands is the quality and inherent biodiversity of the soil; they being relatively undisturbed physically or chemically. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Direct impacts of development that could result in the loss or deterioration of ancient woodland or ancient and veteran trees include

- damaging or destroying all or part of them (including their soils, ground flora or fungi)damaging roots and understory (all the vegetation under the taller trees)
- damaging or compacting soil around the tree roots

- polluting the ground around them
- changing the water table or drainage of woodland or individual trees
- damaging archaeological features or heritage assets

283. It is therefore essential that the ancient woodland identified is considered appropriately to avoid the above impacts.
284. Planning Practice Guidance emphasises: 'Their existing condition is not something that ought to affect the local planning authority's consideration of such proposals (and it should be borne in mind that woodland condition can usually be improved with good management)'.
285. If this application is on, adjacent to or impacting the Public Forest Estate (PFE):
286. Please note that the application has been made in relation to land on the Public Forest Estate and Forestry England, who manage the PFE, is a party to the application. They therefore should also be consulted separately to the Forestry Commission.
287. If the planning authority takes the decision to approve this application, we may be able to give further support in developing appropriate conditions and legal agreements in relation to woodland management mitigation or compensation measures. Please note however that the Standing Advice states that Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal.
288. We suggest that you take regard of any points provided by Natural England about the biodiversity of the woodland.
289. This response assumes that as part of the planning process, the local authority has given due regard as to whether or not an Environmental Impact Assessment is needed under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 or the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended. If there is any doubt regarding the need for an Environmental Impact assessment (Forestry).
290. We would also like to highlight the need to remind applicants that tree felling not determined by any planning permission may require a felling licence from the Forestry Commission.”
291. March 2021 Consultation: No comments received.
292. April 2021 Consultation: No comments received.
293. Kent Wildlife Trust
294. July 2020 Consultation:

295. “Kent Wildlife Trust supports the position of the Woodland Trust with regard to impacts to ancient woodland. It does not seem that concerns raised by the Woodland Trust on 18th November 2019 have been addressed and the proposed buffer continues to be inadequate. We also support concerns raised by KCC Ecology with regards to the impacts of humans, pets, invasive species and external lighting.
296. Kent Wildlife Trust object to this application unless the following is provided:
297. A suitable ancient woodland buffer zone in line with standing advice. The minimum buffer zone of 15m is not considered to be suitable.
298. Details of suitable mitigation measures to sufficiently reduce impacts of increased recreational pressure, the impact of pets and encroachment of invasive species on ancient woodland.
299. A detailed external lighting strategy which demonstrates how impacts to ancient woodland habitat, and other sensitive ecological receptors, will be avoided.
300. More detailed comments on the consultation documents are set out below.
301. Ancient Woodland- Direct and indirect impacts to ancient woodland should be taken into account when determining the suitability of this proposal. Paragraph 175(c) of the National Planning Policy Framework states that *“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”*. As a result of the proposed housing layout in what was previously referred to as block 5, lack of detail within the lighting strategy and proposed pedestrian access, we are not confident that the proposals effectively avoid impacts to ancient woodland.
302. The applicant has included a 15m buffer within their plans, representing the minimum buffer required in line with Natural England and the Forestry Commissions standing advice. The advice states that *“you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you’re likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.”* We would advise that dust, noise and lighting during the construction phase, and noise and lighting during the operational phase, are likely to negatively impact on the ancient woodland. We would also consider that external lighting and noise from residential gardens, which are unlikely to be under the control of the applicant, should be accounted for in the assessment of potential impacts to ancient woodland. On the basis of the above, we believe that a 15m buffer is unlikely to be sufficient to mitigate impacts. Please note that increases in the ancient woodland buffer should not include private gardens, for reasons stated above.
303. A functional ancient woodland buffer should be in place before the commencement of development and should remain in place, without

recreational use, throughout construction and beyond. Buffer zones should be planted with local and appropriate native species or managed through a scheme of natural regeneration. In addition, a suitable lighting strategy, which avoids light spill into ancient woodland should be secured via a suitable condition. Please see below for further comments relating to a lighting strategy. Another concern relating to ancient woodland arises from impacts of increased recreational pressure and pets.

304. Recreation should not be encouraged within ancient woodland or its buffer areas. Where this is unavoidable, due to pre-existing access points, the applicant should provide signage and paths which protect the most sensitive areas of habitat. The applicant should provide details on mitigation to reduce the impacts of pets on the ecology of the ancient woodland habitat.

305. Lighting strategy

At present, the Technical Lighting Report does not appear to take account of ecological receptors. A suitable lighting strategy, which avoids light spill into ancient woodland and other sensitive receptors should be secured via a suitable condition. The lighting scheme should avoid areas where biodiversity enhancements are to be implemented, e.g. locations of bat boxes erected within the site.

306. Local Wildlife Sites (LWS)

The application site is in close proximity to Chevening Estate LWS and Woodlands west of Shoreham LWS. These woodland sites are accessible via a number of public rights of way. We refer you to our advice on mitigating impacts from recreational pressure, pets and invasive species on ancient woodland as this advice also applies to these Local Wildlife Sites.

307. Biodiversity mitigation, enhancements

We recommend that details for the long-term management of green infrastructure and biodiversity enhancement are provided and be secured via a suitable condition. A management plan should include details of how this will be funded and monitored in perpetuity.

308. Biodiversity net gain calculation

There is not enough information to determine if the applicant has satisfied the requirements of the NPPF paragraph 170 by providing net gains for biodiversity. We would advise that, in line with the upcoming Environment Bill that Biodiversity Net Gain be assessed using a suitable metric. The upcoming Bill states that at least 10% BNG should be delivered. We hope to be able to encourage developments to seek ambitious BNG schemes in line with the "*Kent Biodiversity Net Gain Strategy - Statement of Principles*" being prepared by The Kent Nature Partnership. The document states that this strategy should deliver a statutory net gain of 20% as a minimum across Kent, and aim to achieve more wherever possible."

309. March 2021 Consultation:

310. "There are no substantial changes to our previous comments made on 9th July 2020 in light of the amendments. On this basis we maintain our objection for the following reasons:

311. A suitable ancient woodland buffer zone in line with standing advice. The minimum buffer zone of 15m is not considered to be suitable; Details of suitable mitigation measures to sufficiently reduce impacts of increased recreational pressure, the impact of pets and encroachment of invasive species on ancient woodland; A detailed external lighting strategy which demonstrates how impacts to ancient woodland habitat, and other sensitive ecological receptors, will be avoided.”
312. April 2021 Consultation: No comments received.
313. KCC Ecology
314. July 2020 Consultation:
315. “Our previous advice note (dated 28th November 2019) requested further information regarding the following: Badgers; Bats; Invasive Species; External Lighting; Ancient Woodland; Landscape and Ecological Management Plans (LEMP).
316. In response, an updated ‘Framework Ecological Mitigation Strategy’ (FEMS), along with a LEMP, have been provided which addresses our original concerns regarding ecology.
317. Detailed Phase and Outline Phase Mitigation Strategy
We are satisfied with the proposed mitigation measures (as discussed below), which have been proposed within the same document for both the detailed and outline application. However, for clarity and to allow appropriate conditions to be included with any decision notice, we advise that a separate detailed mitigation strategy is submitted for the full and outline planning application. We advise that the language within the detailed mitigation strategies must be absolute and commits to implementation of the mitigation measures, as well as being reflected within the site plans. We are satisfied these measures can be secured via attached conditions if planning permission is granted.
318. Full application suggested condition wording:
Prior to commencement of works (including site clearance), a detailed mitigation strategy for the detailed phase of development will be submitted to, and approved by, the local planning authority. This will include the relevant proposals within the Framework Ecological Mitigation Strategy Rev A (Middlemarch Environmental May 2020).
319. For the remaining phases, we advise that the reserve matters applications should demonstrate adherence to the Outline FEMS, as agreed. However, to achieve this, we advise that along with the first reserve matters application, the Outline FEMS should be revised and submitted as a *detailed site-wide* mitigation strategy (i.e. contain more details than currently is within the outline FEMS). This site-wide mitigation strategy can then be updated with each subsequent reserve matters application.

320. Outline application suggested condition wording:
With the submission of the first reserve matters application, a detailed site-wide mitigation strategy will be submitted to, and approved by, the local planning authority. The strategy will incorporate the measures within the Framework Ecological Mitigation Strategy Rev A (Middlemarch Environmental May 2020).
321. Suggested condition wording for ensure subsequent applications accord with the agreed sitewide mitigation strategy: *With the submission of each reserve matters application, an updated detailed mitigation strategy will be provided. The strategy will accord with the details within the outline mitigation strategy, as agreed as part of condition X. The strategy will be adhered to thereafter.*
322. Roosting Bats
As 13 buildings have been identified as having bat roosting potential, further surveys (and mitigation measures if necessary) must be undertaken prior to the commencement of any associated works. Any buildings which are being utilised by bats will need mitigation measures implemented under Natural England licence to facilitate development.
323. A European protected species mitigation (EPSM) licence will be required to carry out the proposed development due to the impacts upon roosting bats. The Conservation of Habitats and Species Regulations 2018 requires Sevenoaks District Council, the competent authority, to have regard to the requirements of the Habitats Directive in the exercise of their functions. As such, Sevenoaks District Council must consider whether it is likely that an EPSM Licence from Natural England will be granted, and in so doing must address the three tests when deciding whether to grant planning permission for the proposed development. The three tests can be found at the end of this advice note.
324. As tests 1 and 2 are planning considerations, we are only able to comment on test 3 (the favourable conservation status). As licences will not be issued prior to planning permission being granted, SDC must be satisfied that suitable mitigation can be achieved prior to determination.
325. Almost all bat species found in the previous surveys were ‘crevice’ dwelling species (Pipistrelles and Myotis sp.) and, therefore, providing replacement roost space is considered achievable at outline stage. We highlight that breeding Brown Long-eared bats (BLE) were found in building R64 during the 2018 survey and that a replacement roost would require a roof void of at least 2m in height by 5m in length.
326. Section 4.4.1 of the mitigation strategy states that:
For roosts identified during further surveys that will subsequently be required to be destroyed, there is scope within the development to provide suitable replacement features; A purpose-built bat house (which could meet the area specification for a BLE bat roost) may be provisioned, and; Specific mitigation measures will be needed based on the results of updated bat surveys, details of which will be submitted to Natural England when applying for the licences.

327. As such, we advise that if the proposals are strictly implemented as required (subject to variation from Natural England), the favourable conservation status of bats can be maintained.
328. As bats are a primary concern regarding the buildings associated with the detailed application, we advise proposed mitigation measures for bats within this phase are incorporated into the detailed phase mitigation strategy (as above). This should include the results of any updated surveys.
329. For the outline application, we advise that updated detailed mitigation strategies should be submitted with each reserve matters application (as above). Once operational, the impact of lighting on foraging and commuting bats must be considered. This is addressed in lighting section below.
330. Badgers- The survey work undertaken on site has identified one main sett (sett 1), one annex sett (sett 2), three subsidiary setts (setts 4, 5 and 6) and six outlier setts (setts 3, 7, 8, 9, 10 and 11), as labelled within the badger survey report. All setts are located within, or on, the main development site boundary, demonstrating the site's high value for badgers. Sett monitoring in 2018 indicated that three setts (setts 1, 5 and 6) were in current use and 2020 updated surveys found there had been no significant change in the status of badgers onsite. As Badgers are a protected species, mitigation must be implemented in the construction phase of the development and consideration given to their foraging and commuting once operational.
331. Boundary vegetation, including the ancient woodland 15m buffer, will provide badgers with continued habitat connectivity around the site and operational phase measures, such as covering of/providing escape from excavations, have been proposed. Appropriate sett-specific (confidential) details have been provided, such as provision of access tunnels.
332. As such, we advise the proposed mitigation measures for badgers are appropriate and should be secured within the recommended site-wide and detailed mitigation strategies, as above.
333. Invasive Species- Both Rhododendron and Cotoneaster were identified on-site. These Schedule 9 species have the potential to be spread around during construction works and, therefore, contribute to a lowering of biodiversity if allowed to colonise new areas. Our previous advice note requested further information regarding locations and implementation of control. The updated mitigation strategy has provided locations and confirmed that these measures will be implemented through the outline LEMP (and detailed LEMPs for subsequent phases of the development). As such, we advise no further information regarding invasive species is required. The measures to control and monitor invasive species should be secured via the LEMP (discussed further on).
334. Lighting- There is a need to ensure that a sensitive external lighting plan is implemented within the development site (if granted). Lighting can be detrimental to biodiversity including commuting and foraging bats and badgers. Therefore, we advise that there is a need for the external lighting of

the development to be designed in a way that negates a negative impact on biodiversity.

335. Our previous advice note advised that an outline lighting strategy is submitted prior to determination including outline principles and plan depicting the areas that are to be dark/have minimal lighting. Further information has been provided regarding the development's external lighting impact.
336. A map has been provided within the 'Summary Lighting Assessment', clearly showing expected positioning of external lighting, and associated light spill in lux levels. Efforts have been made to limit light spill and it is stated all lighting installation will comply with the respective Sevenoaks lighting policies. Additionally, as proposed within the bat mitigation details (and secured via Natural England licence), there will be no direct lighting on replacement bat roosts. We are satisfied that the outline strategy for lighting is appropriate and can be secured via an attached condition.
337. Dormice- A 2018 survey found one dormouse in boundary vegetation to the south of the site, indicating the presence of an extant population of this protected species on-site. The site supports suitable nesting, hibernation, sheltering and foraging opportunities for dormouse and it is stated that the vast majority of suitable dormouse habitat on site is to be retained and/or enhanced as part of the development proposals. Areas of vegetation will be subject to reduction/removal so there is the potential for dormouse to be negatively impacted in the absence of mitigation measures.
338. The proposed mitigation measures for dormouse (for both the construction and operational phase) includes:
- Production of method statement agreed with Natural England when applying for the licence;
 - Protective fencing around retained habitat (the majority of vegetation on-site);
 - The provision of dormouse nest boxes in periphery vegetation (determined by a suitably qualified ecologist);
 - A nest box monitoring scheme (monitored pre, during and post development);
 - Habitat replacement, enhancement and retained/created habitat connectivity.
 - Appropriate ongoing management of dormouse habitat (included with a Landscape and Ecological Management Plan (LEMP)).
339. A European protected species mitigation (EPSM) licence will be required to carry out the proposed development due to the impacts upon dormice. The Conservation of Habitats and Species Regulations 2018 requires Sevenoaks District Council, the competent authority, to have regard to the requirements of the Habitats Directive in the exercise of their functions. As such, Sevenoaks District Council must consider whether it is likely that an EPSM Licence from Natural England will be granted, and in so doing must address the three tests when deciding whether to grant planning permission for the

proposed development. The three tests can be found at the end of this advice note.

340. As tests 1 and 2 are planning considerations, we are only able to comment on test 3 (the favourable conservation status). We advise that the measures detailed in the mitigation strategy are appropriate to maintain the favourable conservation status of dormice on-site. Therefore, we advise that these measures are secured through the site-wide mitigation strategy condition (as above).
341. Habitats- Following the botanical surveys at Fort Halstead, the grassland and woodland on site appears in a similar condition as when previously surveyed by Waterman Group between 2006 and 2013. Deterioration in the condition of the habitats on-site was recorded during the previous surveys, and this trend has continued with further deterioration particularly noted within the unimproved calcareous grassland in the south of the site, through lack of suitable management. However, overall the site continues to support unimproved and semi-improved calcareous grassland, and ancient broad-leaved semi-natural woodland considered of district value. No protected plant species were observed during the suite of survey work but numerous indicator species for calcareous grassland and ancient woodland were observed, contributing to the overall diversity and value of the habitats on site. We highlight that, under the NERC Act 2006, the local planning authority has a duty to maintain and enhance biodiversity.
342. Some grassland will be lost/impacted from this development but the FEMS states that the unimproved calcareous grassland will not be impacted, as reflected in the submitted parameter plans. However, the FEMS states that other areas, such as the south-west of the development site, will become “...a species-rich wildflower grassland...” and existing calcareous grassland will be improved. The ongoing management of retained/created habitats will be implemented via a LEMP (discussed below).
343. As such, we are satisfied with these proposals and advise measures for grassland are secured through the LEMP (discussed below).
344. Invertebrates- A significant habitat for invertebrates is the short sward calcareous grassland (where several notable invertebrates were found). This habitat is being retained as part of the development and, as such, the most notable invertebrate species should not be displaced from the site as a result of development. Furthermore, as there are proposals to enhance habitats elsewhere onsite (grassland and woodland), it is considered that a separate invertebrate mitigation strategy is not required. We concur with this conclusion and advise the specific habitat enhancement proposals are stated within a LEMP (discussed below).
345. Amphibians- The nearest waterbodies are located c.470m away from the proposed works area and, therefore, it was considered unlikely that any amphibians will be encountered during the development works. As such, we are satisfied that specific mitigation measures for amphibians (most notably great crested newts) are not needed.

346. Management/Enhancements- The updated FEMS cites the use of the Defra Metric 2.0 to achieve biodiversity net-gain. Whilst we are supportive of the use of this metric, only a table of the results has been used within the strategy to demonstrate net-gain. The actual metric has not been included so we cannot confirm these calculations are correct.
347. The submitted information has detailed that the on-going management/enhancement of the retained/created habitats (and their associated monitoring) will be implemented via a Landscape Ecological Management Plan (LEMP). This includes control and monitoring of invasive species (as mentioned above) and management of the retained/created habitats.
348. We have reviewed the submitted outline LEMP which includes suitable enhancement proposals, management prescriptions and associated monitoring. We would add that, regarding tree safety work, all deadwood and reduced/felled trees should be retained on-site as deadwood habitat and control of ‘weeds’ should not be achieved via herbicide application. To secure these measures, as proposed within the outline LEMP, for each reserve matter application, we advise that a condition is attached requiring the submission of a detailed LEMP for each stage (as proposed within the submitted documents).
349. Suggested wording:
With the submission of each reserve matters application, a detailed Landscape and Ecological Management Plan will be provided to demonstrate accordance with the agreed Outline Landscape and Ecological Management Plan (Middlemarch Environmental June 2020)."
350. March 2021 Consultation:
351. "I've checked the previous survey data and can see that the two buildings now to be demolished in the revised proposals weren't identified as having bat roosting potential. Therefore, I advise that our previous comments remain valid."
352. April 2021 Consultation:
353. "The advice provided in our previous response applies equally to this amendment and, therefore, we have no further comments to make."
354. Natural England
355. July 2020 Consultation:
356. "Natural England objects to this proposal. As submitted we consider it will: have a significant impact on the purposes of designation of the Kent Downs Area of Outstanding Natural Beauty (AONB); fail to meet the requirements for redevelopment of this site as set out in the adopted local plan (Policy EMP3).

357. Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.
358. Natural England accepts the principle of development at this site in accordance with the adopted local plan, which includes this site as an allocation (Policy EMP3 - Redevelopment of Fort Halstead).
359. We note that the submission version of the new local plan (December 2018) includes an allocation at this site for a larger scale of development than the current (adopted) local plan allocation.
360. However, following advice from the Inspector to withdraw the currently proposed local plan, our advice is provided in relation to the requirements of the current (adopted) local plan. Considering the details of the current proposal and following a visit to the application site on 21 August 2020, we are objecting to the proposal for the following reasons:
361. This application represents an increased scale of development from that proposed in the adopted policy for this allocation site, and is therefore not in accordance with current local plan policy.
362. The proposed increase in the scale of development would likely result in an increased amount of built development at the site with an overall higher density development than existing. We do not consider that this level of development can be accommodated at this site without significant landscape impacts on the AONB.
363. Given the landscape impacts on the AONB which would occur as a result of this proposal, this proposal fails to conserve or enhance the natural beauty of the AONB as required by both national and local policy.
364. There may be scope for amendments to the proposal that could avoid or mitigate the environmental harm described above. This might include:
Information to demonstrate that the proposal will meet the requirements of Policy EMP3. This policy requires that redevelopment proposals will:
- a. maintain or reduce the current extent of built development on site
 - b. make a positive contribution to the achievement of the aims and objectives of the Kent Downs AONB Management Plan
 - c. conserve and enhance the natural beauty and tranquillity of the Kent Downs AONB
 - d. improve the provision and connectivity of green infrastructure
- Agreement of a planning brief to secure a set of design principles and/or outline parameters that can guide development to a sustainable solution which avoids or mitigates effects on the AONB. Such an approach is indicated as a delivery mechanism to secure the requirements of Policy EMP3. In particular, we advise that measures are secured which:
- e. demonstrate that the proposal will maintain or reduce the current extent of built development on the site. This may include a reduction in the scale of the current application.
 - f. inform the design and layout of the redevelopment that avoid or mitigate effects on the landscape. Such measures should recognise

and reflect the surrounding landscape and settlement character of the Kent Downs AONB, in accordance with the Kent Downs Management Plan and associated guidance.

365. Further detailed advice on the environmental issues informing our objection is provided in Annex A. Additional advice on other important environmental considerations is provided at Annex B.
366. Should the developer wish to explore options for avoiding or mitigating the effects described above with Natural England, we advise they seek advice through our Discretionary Advice Service. Should the proposal change, please consult us again.”
367. March 2021 Consultation: No response received.
368. April 2021 Consultation:
369. “Natural England has previously objected to this proposal and made comments to the authority in our letter dated 02 September 2020, which I have attached. The proposed amendments to the original application are minor and do not address the reasons for Natural England’s objection. Natural England therefore maintains our objection, and the comments provided in our previous response applies equally.”
370. AONB Unit
371. July 2020 Consultation:
372. “Thank you for consulting the AONB Unit on the amended plans in respect of the above application. The following comments are from the Kent Downs AONB Unit and as such are at an officer level and do not necessarily represent the comments of the whole AONB partnership. The legal context of our response and list of AONB guidance is set out as Appendix 1 below. While recognising that the revised proposals reduce the proposed number of dwellings and accordingly the overall density, the AONB Unit remains of the view that the amendments do not wholly address the AONB Unit’s concerns set out in our consultation response to the application dated 13 November 2019, attached as Appendix 2 to this letter.
373. In particular: The proposed uplift in employment space amounts to just 114 sqm. As such, and with a proposed inclusion of 635 residential units, the scheme remains primarily residential in nature, in direct conflict with the policy requirement set out in EMP3 for development to be employment-led.
374. While we note that the densities have been reduced from the originally submitted plans, they remain in excess of the previous approval as well as what is characteristic and appropriate for a new settlement in the Kent Downs, as result of the uplift in overall residential units proposed for the site. We do however welcome the revised variation in densities proposed for the Village Mews Character Area.

375. The proposed apartment buildings remain unchanged comprising large-scale blocks of a scale and mass. We remain of the view that these have no relation to village settlements in the Kent Downs AONB, adopting an urban scale and design more appropriate to a city location, and that the scale and design of these buildings is wholly inappropriate for this location.
376. The materials palette is also unchanged, and we remain of the view that widespread use of white and buff brick, and grey tiles as is promoted in the Design Principles would fail to achieve the local distinctiveness of the Kent Downs.
377. We are surprised to see the AONB Statement submitted with the application justify the acceptability of the materials by stating ‘At this stage, details of material are indicative only with the exception of Q13 and Q14 in the Village Centre. As with the original permitted planning application, reserved matters applications will be prepared to provide detail on the scale, layout and appearance of the development and the AONB Unit will be consulted on as part of this process.’ Such a statement brings into question the purpose and validity of the submitted Design Principles. Such a statement also reinforces our previously raised concerns regarding the fact the application is premature, being submitted ahead of a Development Brief as required under Local Plan policy EM3, as it intimates little reliance and certainty can be placed on the Design Principles and Character Area Guidance contained within this on future proposals coming forward.
378. Our concerns regarding the extent of tree removal and the impact of local character remains, as despite the reduction in unit numbers and density, the proposals still permit for the loss of up to 30 percent of the existing tree cover on the site, with 15 per cent confirmed to be removed and an uncertain future for the remaining 15 per cent.
379. Taking the above into account, we remain of the view that the proposal is not limited in scale or extent and fails to meet or assure the standards which should be expected within the Kent Downs AONB and fails to meet both local and national policy relating to nationally protected landscapes as well as failing to comply with all aspects of the Kent Downs AONB Management Plan, as set out in detail in our letter dated 13 November 2019. The Kent Downs AONB Unit therefore maintains its objection to the application”
380. March 2021 Consultation:
381. “Thank you for consulting the AONB Unit on the amended plans in respect of the above application. The following comments are from the Kent Downs AONB Unit and as such are at an officer level and do not necessarily represent the comments of the whole AONB Partnership. The legal context of our response and list of AONB Guidance is set out as Appendix 1 below.
382. The proposed revised proposals are minor in nature and do not address the AONB Unit’s concerns set out in our consultation response to the application dated 13 November 2019 and 22 July 2020. We therefore maintain our objection and comments made in these previous responses.”

383. April 2021 Consultation: No comments received.
384. Kent Fire and Rescue Service
385. July 2020 Consultation:
386. “I can confirm that on this occasion it is my opinion that the amendments are not detrimental to off-site access requirements of the Fire and Rescue Service.”
387. Under the 2019 consultation, Kent Fire and Rescue Service commented that the means of access is considered satisfactory.
388. March 2021 Consultation: No comments received.
389. April 2021 Consultation: No comments received.
390. Southern Water
391. July 2020 Consultation:
392. “The development site is not located within Southern Water’s statutory area for water supply and drainage services. Please contact the relevant statutory undertaker.”
393. March 2021 Consultation:
394. “The development site is not located within Southern Water’s statutory area for water supply and drainage services. Please contact the relevant statutory undertaker.”
395. April 2021 Consultation:
396. ““The development site is not located within Southern Water’s statutory area for water supply and drainage services. Please contact the relevant statutory undertaker.”
397. Thames Water
398. July 2020 Consultation:
399. “Waste Comments
Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
400. The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material

change to the proposal, which would require an amendment to the application at which point we would need to review our position.

401. Water Comments- Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.
402. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.
403. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes> .
The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-ordiverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk”
404. March 2021 Consultation: No comments received.

405. April 2021 Consultation: No comments received.
406. KCC Lead Local Flood Authority
407. July 2020 Consultation:
408. “We provided a consultation response on 11 November 2019 which recommended conditions for the outline and full applications. This response was based upon a Flood Risk Assessment and Drainage Strategy prepared by Hydrock (19 September 2019).
409. The updated masterplan is reflected in a revision of the proposed Surface Water Drainage Strategy (Drawing 1030-HYD-XX-XX-DR-C-2201 Rev P05), whereby an additional drainage basin is included and a second basin adjusted in size. We would note that the revisions to the Surface Water Drainage Strategy are not necessarily reflected in other documents for example the Illustrative Masterplan and Land Use and Green Infrastructure Plan which do not reflect the inclusion of the new attenuation basin N. This matter should be addressed to ensure the open space elements appropriately reflect surface water requirements.
410. We have reviewed the submitted information and we would refer you to our application response of 11 November 2019 and conditions previously recommended. We would also recommend the consideration of surface water drainage within the layout at reserved matters stage of the planning process if this application is recommended for approval as follows: (condition relating to surface water drainage provisions for all rainfall durations).”
411. March 2021 Consultation:
412. “We have no further comment to make on this proposal and would refer you to our previous response on 27 July 2021.”
413. April 2021 Consultation:
414. “We have no further comment to make on this proposal and would refer you to our previous response on 27 July 2021.”
415. Environment Agency
416. July 2020 Consultation:
417. “We have reviewed the Environment Statement Addendum submitted. No additional information with regards to ground conditions and contamination appears to have been submitted as part of this application. As such we have no additional comments, please refer to our previous response under KT/2019/126263/01.”
418. March 2021 Consultation:

419. "We have no further comments to add and refer back to our original response referenced KT/2019/126263/01-L01 and dated 7 November 2019."
420. April 2021 Consultation:
421. "We have no further comments to add and refer back to our original response referenced KT/2019/126263/01-L01 and dated 7 November 2019."
422. Kent Police- Crime Prevention Design Officer
423. July 2020 Consultation:
424. "As detailed in my previous letter dated 14th November 2019, if this application is to be approved, we strongly request a CPTED Condition be included to address the points below and show a clear audit trail for Design for Crime Prevention and Community Safety to meet our and Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998.
425. Having reviewed the application on-line, we were unable to find the Design and Access Statement Part 1. However, the previous application references Paragraph 127 of the NPPF. My previous comments remain valid and are repeated or amended in italics below. The applicant may wish to note that lighting should now conform to BS5489-1:2020, which supersedes BS5489-1:2019.
426. We appreciate the plans may be indicative at this time. We note the reference to Paragraph 127 of the NPPF within the Design and Access Statement (DAS) dated September 2019 (page 10), however section (f) has been omitted in regard to crime prevention. We also note section 9.7 Designing Out Crime on page 181 of the revised DAS (online date published 11/06/20).
427. The following issues need to be addressed including:
1. The use of the SBD Homes 2019; SBD Commercial 2015 and SBD New Schools 2014 initiatives are recommended for these proposals should the planning application be granted.
 2. Development layout and permeability. Design and creation of new and upgrading of existing and proposed foot and cycle paths.
 3. CPTED for the residential areas, school/educational, commercial and business campus elements.
 4. Design of the garden street, The Square and other communal areas.
 5. Perimeter, boundary and divisional treatments including gates. Front, side and rear boundary treatments should follow SBD Homes 2019.
 6. Corner Properties and defensible spaces.
 7. Recesses. We note the inclusion of recesses as part of the building design of the proposed Blocks (e.g. Block B). These recesses give us some cause for concern as they may provide hiding areas and opportunities to commit crime.
 8. Parking inc. visitor. Rear parking courts should be avoided. If there is to be any undercroft parking, it should be gated and access controlled to remove the opportunities for crime.
 9. CCTV.
 10. Access Control. Full audio visual door entry access control systems will be

- required for any block of flats of 4 residential units or more.
11. Doorsets and windows. We note Crittall style windows are referenced within the DAS for the Village Centre dated October 2019, along with the listed nature of some of the buildings. Doorsets and windows should be certified to PAS24:2016 as per SBD Homes 2019, particularly if an SBD accreditation or security points for BREEAM are required.
 12. Security Compartmentation will be required for all blocks of flats of 25 residential units or more.
 13. Alarms.
 14. Landscaping.
 15. Play areas. We note that LEAPs and LAPs will not be fenced. Whilst we appreciate the reasoning (page 102 of the DAS), we recommend low level fencing or hedging and gates with auto closers, to deter/prevent dogs from accessing any formal play areas.
 16. Youth shelters, MUGAs and skate parks etc. Location and design is very important to prevent/deter anti-social behaviour and crime.
 17. Lighting. Lighting should be specified to BS5489-1:2020 as per SBD Homes 2019. SBD state: "18.3 Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime. It should be avoided."
 18. Cycle and bin storage.
428. We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.
429. This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application."
430. March 2021 Consultation:
431. "As detailed in my previous letters dated 14th November 2019 and 27th July 2020, if this application is to be approved, we strongly request a CPTED Condition be included to address the pointed repeated and amended below and show a clear audit trail for Design for Crime Prevention and Community Safety to meet our and the Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998.
432. Having reviewed the application online, we were unable to find the Design and Access Statement Part 1. However, the previous application references Paragraph 127 of the NPPF.
433. My previous comments remain valid and are repeated or amended in italics below. The applicant may wish to note that lighting should now conform to BS5498-1:2020, which superseded BS5489-1:2019." (Other comments above repeated).
434. April 2021 Consultation: No comments received.
435. Ministry of Defence- Safeguarding

436. July 2020 Consultation:
437. “The application site occupies the statutory explosives safeguarding zone surrounding Fort Halstead. Buildings within this zone should be ‘non-vulnerable’ that is of robust construction and design so that should an explosion occur at the site, buildings nearby will not collapse or sustain damage that could cause critical injury to the occupants. After reviewing the application, I can confirm the MOD has no safeguarding objections to this proposal.”
438. March 2021 Consultation: No comments received.
439. April 2021 Consultation: No comments received.
440. London Borough of Bromley
441. July 2020 Consultation:
442. Objection: “Bromley Borough Council objects to the proposal based on the harmful impact on highway conditions within the London Borough of Bromley.”
443. March 2021 Consultation:
444. Objection: “Bromley Borough Council objects to the proposal based on the harmful impact on highway conditions within the London Borough of Bromley.”
445. April 2021 Consultation: No comments received.
446. SDC Housing Policy
447. July 2020 Consultation:
448. “It is noted the revision will reduce the number of homes to 635 (from 750). The applicants have submitted a viability assessment which claims to demonstrate that a Core Strategy Policy SP3 compliant level of affordable housing (40%) is not possible. The applicant is suggesting two options for affordable housing provision (Scenarios 1 and 2).
449. We understand the District Council will commission its own assessment to examine viability. Subject to the applicant's viability assessment being verified, Housing Policy would advocate affordable housing provision as per Scenario 1. This would provide 17% affordable housing (108 homes) providing a Core Strategy Policy SP3 compliant split of 65% of homes for Affordable Rent (70 homes) and 35% for Shared Ownership (38 homes).
450. This preference is advocated as Scenario 1 best meets the housing needs identified by the Sevenoaks District Housing Register and is Core Strategy compliant in terms of tenure split. As per previous comments, the affordable housing should be secured through the District Council's template S106

agreement (modified for this development, as appropriate) and delivered by a preferred Provider partner. Homes for Affordable Rent should attract rents of up to 80% of Open Market Value or the relevant Local Housing Allowance, whichever is the lower figure. This will ensure homes are affordable to those in receipt of housing benefit/universal credit.

451. As per the Local Plan Submission Version 2019, it is expected all homes, irrespective of tenure, will meet the Nationally Described Space Standards. We would look for all affordable housing to comply with Part M4 (2) of the Building Regulations. We would look for an agreed level of homes for Affordable Rent to comply with Part M4(3) of the Building Regulations.”
452. March 2021 Consultation: No comments received.
453. April 2021 Consultation:
454. It is noted that following viability testing, the development will provide 20% affordable housing (127 homes), comprising a Core Strategy SP3 policy compliant tenure split of 65% for Social Rent/Affordable Rent (83 homes) and 35% for Intermediate Housing (44 homes).
455. Owing to benefit restrictions and the overall household benefit cap, any 4 bedroom affordable homes would be supported for Social Rent only. The affordable housing should be clustered throughout the development and be indistinguishable from market housing.
456. The exact type, tenure, size and location of the affordable housing to be agreed by the Head of Housing at Reserved Matters.
457. We expect the affordable homes to be delivered by a partner housing Provider. See the District Council's website for details of contacts. We recommend early contact with the Provider so that their views can be incorporated in the Reserved Matters application. We expect the affordable housing to be secured through the District Council's template S106 agreement.
458. All other matters highlighted in the Housing Policy response dated 21 July 2020, remain relevant.”
459. SDC Planning Policy
460. July 2020 Consultation:
461. “There are no substantial changes to our previous comments in light of the amendments. However, it is noted that the application has been amended to reduce the number of dwellings to less than the proposed allocation in the Local Plan. The site currently lies within the Green Belt. The Local Plan seeks to make efficient use of available land and any allocations would be removed from the Green Belt.”
462. March 2021 Consultation: No comments received.

463. April 2021 Consultation:

464. “There are no substantial changes to our previous comments in light of the amendments.

465. However, there is an update with regards the status of the previously emerging Local Plan which may have an impact on how the application is considered. This is set out below.

466. The previously emerging Local Plan, which proposed to allocate this site for an additional 300 residential units over and above what was granted planning permission under 15/00628/OUT (ST2-57), is no longer at examination since the Inspector’s final report (2 March 2020) concluded that the Plan is not legally compliant in respect of the Duty to Co-operate and recommended that the Plan is not adopted. The District Council was granted permission to bring a judicial review against the Inspector’s decision, however this was unsuccessful (judgement published 13 November). The Council then lodged an application to appeal against the Judicial Review ruling which was also unsuccessful. Getting a Local Plan in place is a priority and discussions are currently being held with MHCLG to discuss the way forward.

467. Therefore, the previously emerging Local Plan and its policies (and specifically the proposed allocation at Fort Halstead ST2-57) do not carry any weight and cannot be relied upon. The adopted development plan remains the Core Strategy (2011) and Allocations and Development Management Plan (2015), however some of these policies may be considered either fully or partially out of date, where they are not in accordance with the NPPF.”

468. SDC Environmental Health

469. July 2020 Consultation:

470. Noise Officer:

471. “I have reviewed the acoustic assessment and given the information available appears a reasonable representation of the likely impact. I would have preferred more detail on the location and construction detail of the ranges and the firing chambers to better judge if the assumptions made in the report concur with the actual construction, locations etc.

472. As the events are likely to be as described, being irregular, or limited duration and during the day, the potential for intrusion is limited, I therefore accept the methodology and findings of the noise report.”

473. Contamination Officer:

474. “I am in general satisfied with the outline remediation method statement. The report states that further assessment is required following demolition before a detailed remediation method statement can be prepared.”

475. Air Quality Officer:

476. “I am satisfied with the submitted air quality assessment (Waterman September 2019 REF: WIE14806-100_R-1-1-3-AQA_AB) that report concludes:

7.4. As identified above, the Development is predicted to have a negligible impact on local air quality and therefore the effect of the Development would be not significant. Accordingly, mitigation measures would not be required in terms of air quality and therefore the likely residual effect of the Development on air quality would remain not significant. 7.5. It is considered that the effect of introducing sensitive uses (residential/school) to the Site is not significant and no further mitigation measures are required to make the Site suitable for the proposed uses.

477. Whilst I accept this conclusion I was wondering what scope there is for requiring some actions to seek to improve air quality in line with paragraph 181 of the NPPF.

478. Is local plan policy T1 which requires electric vehicle charging points to be installed currently being implemented?"

479. March 2021 Consultation:

480. "I have no new observations regarding this application."

481. April 2021 Consultation:

482. "Further to my previous comments stating I have no observations regarding this application, colleagues have raised concerns regarding the private water distribution network used on this site as it appears the system is old and contrasted using materials that are prone to failure. This may result in a matter of public health significance and therefore how is the applicant intending to address this problem."

483. SDC Direct Services

484. July 2020 Consultation: No response.

485. March 2021 Consultation: No response.

486. April 2021 Consultation: "The main areas of concern relate to access for HGV waste vehicles and bin storage and are outlined in Appendix 1. However we have concerns that the bin store quoted we believe is not fit for purpose for 635 properties and although the access roads look ok (Crow Drive) the roads around each "Hamlet" look too narrow for a 26ft waste vehicle to manoeuvre, which could mean that domestic waste cannot be collected."

Network Rail

487. July 2020 Consultation: No response

488. March 2021 Consultation: No response

489. April 2021 Consultation: (summary)

"As a public funded company, Network Rail has responsibilities to spend public funds efficiently which consequently means we do not have the funds

available to mitigate the impact of third-party development. Where a significant amount of rail trips are generated by a third-party development, Network Rail request that the development provides a contribution to mitigate the addition usage, ensuring that the station can continue to operate effectively and provide a good standard for rail passengers.

Consequently, Network Rail welcome the applicant's proposal to enhance and increase the secure cycle parking at Knockholt, however, Southeastern Railway have confirmed that this work has already been completed. As a result, we ask that this money is used for other enhancements to accommodate these additional users such as safe walking routes, safe cycle access to the station.

NR and Southeastern Railway welcome further discussions to identify suitable enhancements to Knockholt station to mitigate the impact of additional rail passengers and ensuring that the station can continue to operate efficiently.”

490. Other Consultees

491. No response was received to the July 2020, March 2021 or April 2021 consultations from the following: NHS Bromley CCG; South East Coast Ambulance Service; National Planning Casework Unit; Network Rail; Amenity Societies; Woodland Trust; National Grid Protection; Ministry of Defence. Some of these did however comment in 2019. Their comments are available in full online and can be summarised as follows:
492. The Ministry of Defence commented in November 2019. They confirmed no safeguarding objections were raised.
493. The Government's Planning Casework Unit, commented in October 2019 that they had no comments to make on the environmental statement.
494. The Woodland Trust commented in November 2019 and objected on the basis of damage to several areas of ancient woodland designated on the Ancient Woodland Inventory. They did not respond to subsequent consultations.
495. NHS Bromley CCG commented in October 2019. This states that measures should be put in place to support the health needs of the potential increased population of around 2000 patients. They have consulted with NHS West Kent CCG and were satisfied that they were aware of the development and that the potential growth has been recognised within their own boundaries and it had been linked to the Infrastructure Delivery Plan.
496. National Grid Protection commented in October 2019. This contains advice to the developer and details their obligations. It states that the information was referred to the Asset Protection team for further comment. No such comments were received.
497. South East Coast Ambulance Service commented in November 2019 stating they have no objections to the development.

498. The Victorian Society and The Council for British Archaeology commented jointly in November 2019 stating they have both decided not to comment.

Representations

499. Over the course of the four public consultations, the following public representations have been received:

247 objections;

3 comments in support;

5 comments neither supporting nor objecting.

500. The main issues raised can be categorised as follows:

Transport infrastructure- including impact on existing roads, public transport, public transport services, traffic generation and the lack of new services proposed;

Overdevelopment and too high densities;

Impact to existing local services including doctors and schools, and lack of services proposed;

Green Belt issues;

Highway safety, predominantly relating to Star Hill Road, and construction traffic;

Impact to the rural character, including the amenity of local villages;

AONB impacts;

Employment- that the development is no longer employment-led and lack of employment opportunities in the area;

Cumulative impacts with other developments in the area, including Broke Hill Golf Course;

Land contamination;

Biodiversity and wildlife impacts;

Sustainability;

Ancient woodland, tree and woodland impacts;

Air quality, pollution, noise and light pollution;

Services and water supply issues;

Lack of evidence of housing need, no need for the primary school and lack of benefits to the existing communities;

Lack of affordable housing;

Flooding issues

Impact on outlook and views;

Heritage Impacts and impacts on the listed buildings;

Lack of cross boundary co-operation on housing need;

Construction disturbance

Design and visual impacts of the development;

Lack of village green amenity space;

Creation of crime;

Inadequate public consultation;

Poor highway maintenance;

Legal issues (including Right to Roam Land) and private property rights;

Concerns that the developer will not build the school and employment spaces;

DDA facilities and equalities;

Lack of consultation from the developer;

Costs to residents of road upkeep;

Community cohesion and resident integration;
Allocation of CIL funds.

Planning Appraisal

501. This part of the report contains the Officer's assessment of the application. The main considerations, which are considered in turn below, relate to the following:

Policy context

Principle of the development including proposed land uses;

Housing mix, density and affordable housing;

Green Belt implications;

Heritage Assets: Scheduled Ancient Monument of The Fort; listed buildings on the site; area of archaeological potential and non-designated heritage assets, and their settings;

Visual, landscape and AONB impacts;

Transport and highways implications;

Public Right of Way Network;

Protected trees, woodland and landscaping;

Biodiversity;

Residential Amenity;

Air Quality;

Contamination;

Flooding and Drainage;

Infrastructure;

Overall findings of the Environmental Statement

Conclusions and Planning Balance.

Policy Context

502. This section sets out how local policies relate to the NPPF and how this has changed in relationship to those policies that relate specifically to the site at Fort Halstead. The changes have an impact on how key aspects of this current proposal are considered.

503. In the Core Strategy (paragraph 4.5.16), this site was named as a major developed site, based on PPG2 guidance in Planning Policy Guidance 2 (PPG2).

504. PPG2 was superseded by the NPPF in 2012 and the NPPF has itself been amended since that time, lastly in 2019.

505. The 2015 ADMP, which formed the starting point for the 2015 Fort Halstead application, built on the Major Developed Site proposal (EMP2) with a specific policy, EMP3.

506. The 2015 scheme that was granted planning permission was considered appropriate in the Green Belt and it was concluded there would be no greater harm.

507. ADMP policy EMP3 was used as a starting point for the 2015 planning permission.
508. Permission was granted for 450 residential units with up to 27 000sqm B1/B2 uses, hotel, village centre etc. and this has been implemented, which is a material consideration.
509. The NPPF is more up to date than many of our local policies. Where local policies are out of date, they will be given less weight to the extent that they are inconsistent with the NPPF.
510. The latest version of the NPPF puts a greater emphasis on making effective use of land to meet the need for homes, while safeguarding and improving the environment and re-using previously developed land (para 117).
511. Para 118 lists a number of requirements for planning policies and decisions, including:
Encouraging multiple benefits including mixed use schemes that take the opportunity to improve public access to the countryside; Support appropriate opportunities to remediate despoiled, degraded, contaminated or unstable land; Promote and support the development of under-utilised land and buildings, especially if this helps to meet identified needs for housing where land is constrained and available sites could be used more effectively.
512. Para 121 encourages a positive approach to applications for alternative uses of land which are currently developed, to help meet identified needs. It encourages particular support for retail and employment uses and for homes in areas of high housing demand, and to making more effective use of sites, subject to other policies and considerations.
513. Para 122 of the NPPF expects policies and decisions to support development that makes efficient use of land, taking into account a number of factors, including, amongst other matters:
- The identified need for housing;
 - The availability of infrastructure, the potential for further improvement and the scope to promote sustainable travel modes;
 - The desirability of maintaining an area's prevailing character and setting or of promoting regeneration and change.
514. Para 123 of the NPPF expects development to make optimal use of the potential of each site, particularly where there is a shortage of land to meet identified housing needs.
515. The current version of the NPPF includes some changes to the assessment of proposals in the Green Belt, compared to the 2012 version that was a consideration for the previous planning permission.
516. Para 145(g) of the NPPF sets out the circumstances in which the partial or complete redevelopment of previously developed land, may be appropriate development in the Green Belt.

517. The 2012 NPPF advised that the redevelopment of previously developed land can be appropriate development in the Green Belt if the proposal would have no greater impact on the openness of the Green Belt and the purpose of including land within it, than the existing development. This was a key consideration for the 2015 application.
518. The 2019 NPPF (para 145(g)) states that the redevelopment of previously developed land is appropriate if it 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.
519. This provides the potential for more development on the site, yet retaining the potential for it to be appropriate in the Green Belt, compared to the previous permission, providing there is no substantial harm to openness, and the other criteria are met. The current proposal has a lesser footprint than the existing, but a greater bulk and scale. As the NPPF is more up to date, it is given more weight than some of the local policies, particularly those referring specifically to the parameters for development on this site, which guided the quantum of development for the first application, as set out in policy EMP3 of the ADMP.
520. Policy EMP3 refers to up to 450 residential units as part of a mixed use scheme to deliver an employment-led development. Noting the magnitude of the overall housing need in the District, this policy should be given less weight to the extent that it is inconsistent with the NPPF, which places a stronger emphasis on making effective use of land to meet the need for homes. The NPPF also encourages development that would help build a strong, responsive and competitive economy (para 8).
521. As the NPPF is more up to date, Policy EMP3, is now given less weight, to the extent that it is inconsistent in part with the NPPF. A proposal that maintained or increased the quantum of employment development, and also increased the number of residential units, as supported by the NPPF, would alter the balance between these uses so that a proposal may not be seen as 'employment led'. A proposal that complied with Policy EMP3 as a whole, would be inconsistent with the requirements of the NPPF.
522. In relation to this current proposal, the site is previously developed land. Previously developed land includes land which is or was occupied by a permanent structure(s) including the whole of the curtilage of the structure(s). If it is demonstrated, that the development of the site would not cause substantial harm (my emphasis) to the openness of the Green Belt and would meet an identified affordable housing need in the District, then the proposal would be appropriate development in the Green Belt.
523. A key issue on which our local policies are out of date, relates to housing supply. Key points to consider in respect of housing supply are as follows:
- There is a need for 714 units per year in Sevenoaks District, calculated using the standard methodology (March 2021).

- Comparing this to delivery, the latest Housing Delivery Test results (2020) show that 70% of the overall housing need has been delivered over the previous 3 years, and therefore a 20% buffer applies to the 5 year supply calculation.
- We do not have a 5 year supply (we have 2.6 years as at August 2020).
- As our housing supply figure is untested, the ‘tilted balance’ can apply in some cases.
- Given the Housing Delivery Test result falls under 75%, and we cannot demonstrate a 5 year supply, both of these things independently mean that there is a presumption in favour of development subject to para 11(d) of the NPPF (the ‘tilted balance’).

524. The presumption in favour of development relates to para 11(d) of the NPPF. It advises that where there are relevant development plan policies, but the most important for determining the application are out of date, planning permission should be granted unless:

- Policies in the NPPF that protect areas or assets of particular importance that would be provide a clear reason for refusal, or
- If granting permission would lead to adverse impacts that would significantly and demonstrably outweigh the benefits, when assessed against the NPPF policies as a whole.

525. Item i) has a footnote in the NPPF, which links this test to land with specific designations, including Green Belt, Areas of Outstanding Natural Beauty and designated heritage assets, all of which apply to this site.

526. The previously emerging Local Plan, which proposed to allocate this site for an additional 300 residential units over and above what was granted planning permission under 15/00628/OUT, is no longer at examination since the Inspector’s final report (2 March 2020) concluded that the Plan is not legally compliant in respect of the Duty to Co-operate and recommended that the Plan is not adopted. The District Council was granted permission to bring a judicial review against the Inspector’s decision, however this was unsuccessful (judgement published 13 November). The Council then lodged an application to appeal against the Judicial Review ruling which was also unsuccessful.

527. Therefore, the previously emerging Local Plan and its policies do not carry any weight and cannot be relied upon. The adopted development plan remains the Core Strategy (2011) and Allocations and Development Management Plan (2015), however some of these policies may be considered out of date, where they are not in accordance with the NPPF.

528. Reviewing the local policies that are relevant to this application, the following key policies are considered out of date in whole or part:

Core Strategy

LO1 - Distribution of Development	Partially in date- generally in accordance with the NPPF as supports sustainable development, but does not fully meet need.
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LO8 - The Countryside and Rural Economy	Partially in date- generally in accordance with the NPPF as protects GB and conserves and enhances the natural environment. Will be reviewing extent of the Green Belt.
SP1 - Design of New Development and Conservation	In date.
SP2 - Sustainable Development	Partially in date- generally in accordance with the NPPF as supports climate change mitigation and adaptation, however national changes to the Code for Sustainable Homes and BREEAM post date the policy.
SP3 - Provision of Affordable Housing	Out of date- superseded by national policy updates.
SP5 - Housing Size and Type	In date.
SP7 - Density of Housing Development	Out of date - does not make efficient use of land (NPPF).
SP8 - Economic Development and Land for Business	Partially in date- generally in accordance with the NPPF as supports economic growth and provides flexibility, however MDS' no longer exist and note recent changes to PD rights / the new E use class.
SP9 - Infrastructure Provision	In date.
SP10 - Green Infrastructure, Open Space, Sport and Recreation Provision	In date.
SP11 - Biodiversity	Partially in date- generally in accordance with the NPPF as conserves and enhances the natural environment, but precedes national biodiversity net gain requirements.

ADMP

SC1 - Presumption in Favour of Sustainable Development	Partially in date- the thrust of the policy is in accordance with the NPPF however the specific wording is no longer consistent as we are now required to specifically consider and apply policies that protect areas or assets of particular importance.
EN1 - Design Principles	In date- linked to SP1 as contributes towards the government aim to provide healthy and safe communities.

EN2 - Amenity Protection	In date- linked to EN7 and T1.
EN4 - Heritage Assets	Partially in date- linked to LO8, but doesn't go as far as the NPPF, which requires us to consider the significance of the heritage asset and the impact of the proposed development on that significance.
EN5 - Landscape	In date- linked to LO8.
EN6 - Outdoor Lighting	In date- in accordance with the NPPF which seeks to limit the light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
EN7 - Noise Pollution	In date- in accordance with the NPPF which seeks to mitigate and reduce potential adverse effects of noise pollution from new development.
EMP2 - Major Developed Employment Sites in the Green Belt	Partially in date- must make efficient use of land (NPPF).
EMP3 - Redevelopment of Fort Halstead	Partially in date- must make efficient use of land (NPPF).
GI1 - Green Infrastructure and New Development	In date- in accordance with the NPPF as conserves and enhances the natural environment and seeks to protect and improve biodiversity.
LT1 - Tourist Accommodation and Visitor Attractions	In date- in accordance with the NPPF as supports the rural economy.
T1 - Mitigating Travel Impact	In date- in accordance with the NPPF as mitigates adverse impacts of development.
T2 - Vehicle Parking	In date, in accordance with the NPPF as promotes sustainable transport.
T3 - Provision of Electrical Vehicle Charging Points	In date- in accordance with the NPPF as supports climate change mitigation and adaptation.

529. Accordingly, as there are relevant development plan policies that are out of date, the criteria at para 11(d)(i) of the NPPF need to be considered.

530. This report will assess whether the impact on the Green Belt, Areas of Outstanding Natural Beauty and designated heritage assets, when assessed against local and national policy, would provide a clear reason(s) for refusal, amongst other matters that need to be taken into account.
531. If it is concluded that there is not a clear reason for refusal on these issues, then consideration will be given to para 11(d)(ii) of the NPPF, the ‘tilted balance’. Planning permission should be granted unless granting permission would lead to adverse impacts that would significantly and demonstrably outweigh the benefits, when assessed against the NPPF policies as a whole.

Principle of the development

532. As set out in Section 36(6) of the Planning and Compulsory Purchase Act 2004, applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. For Sevenoaks, the Development Plan is made up of the Core Strategy (CS) and Allocations and Development Management DPD (ADMP). The Sevenoaks ‘Development in the Green Belt’ Supplementary Planning Document is also relevant and includes a section on developing brownfield sites in the Green Belt. National Planning Policies, such as those contained in the National Planning Policy Framework (NPPF) are material considerations. In the case of this proposal at Fort Halstead, other legal tests also apply for example in respect of AONB impacts and impacts on Heritage Assets. These are discussed in turn below.
533. The consideration should be whether *overall* the proposal complies with these policies or not, noting that that some policies will pull in different directions and not all elements of all policies may be complied with.
534. Policy EMP3 is a key consideration as the ADMP policy relating to Fort Halstead. This policy formed the key consideration of the earlier 2015 planning permission. The site was identified as a “major developed site” within the Core Strategy. As discussed above, the Core Strategy at the time was based on national guidance contained in the “Planning Practice Guidance 2: Green Belt” (PPG2) and the site allocation for Fort Halstead in the ADMP built on the Core Strategy statement.
535. There have been material changes in planning policy and other matters since the earlier grant of planning permission which impact on the consideration of this application, as summarised above. These changes will be referred to throughout this report where relevant. The most notable of these changes include:
- The publishing of the NPPF and its updates, the current version being February 2019. This contains a presumption in favour of sustainable development, and is the most up to date policy applicable.
 - Absence of a 5 year housing supply in Sevenoaks District
 - The implementation of the 2015 planning permission.
536. The principle of development in this instance therefore falls to be considered not only under policy EMP3, but also the NPPF. The extant 2015 planning permission must also be borne in mind and is a material consideration.

537. Policy EMP3 of the ADMP accepts the principle of the re-development of the site subject to compliance with a number of specified criteria (addressed in sequence below). This policy states that up to 450 dwellings, a range of employment uses and a hotel may be permitted provided it is part of a mixed use scheme that delivers employment led development and that the other aspects of the policy are met. The quantum of development set out in this policy was set prior to current NPPF policy. The current NPPF promotes a higher quantum of development on sites where the policies in the Framework are met, to make effective use of land to meet the need for homes and other uses. The NPPF guidance in this respect, is to be given more weight than the limits in policy EMP3. Policy EMP3 is out of date to the extent it is inconsistent with the NPPF.

538. Nevertheless, the expectations of the policy for any redevelopment of the site, remain material considerations that can be given weight.

539. EMP3 details the priorities for the redevelopment of the site as follows:

- 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 networks;
- 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.
- 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.

540. These criteria are assessed and referenced throughout the report below.

541. The Green Belt implications in this case are similarly fundamental to the acceptability of the principle of the development on the site and there has been a notable change in policy in this regard, arising from the NPPF. This is

discussed in turn below, and in summary Officers are of the view that the proposed development is capable of being appropriate development in the Green Belt, and in line with the NPPF in this regard.

Proposed Land Uses

542. The site is allocated within the ADMP as a major employment site and policy EMP3 makes clear that the Council’s aspirations for the site entailed an employment-led development which would offer a range of employment uses such as research and development, serviced offices and workshops and that the site should generate at least the number of jobs that the site accommodated prior to announcement of DSTL withdrawing from the site. EMP3 supports the provision of up to 450 homes as part of the mixed use scheme alongside appropriate community facilities and infrastructure to support the sustainable development of the site. As explained above, the quantum of development set out in Policy EMP3 needs to be considered with caution as it is out of date to the extent to that it is inconsistent with the NPPF. The changes in policy set out in the NPPF, would expect a higher quantum of development on the site.

543. The proposals would incorporate a number of land uses across the site, as described within the description of development. The applicant has submitted the following indicative summary of the extent of land uses, both with and without the primary school scenario (discussed further below). If the land were not used for a primary school then it would revert to an employment use.

	Development Including primary school (m2 GEA)	Development excluding primary school (m2 GEA)
Business Floorspaces (former classes B1/ B2/ B8- now class E(g) and B2 and B8) 544. Including retained QinetiQ buildings, new employment buildings and village centre buildings of B1a/ B1b use	26,425	27,773
Community Uses within the Village Centre and Fort (classes D1/D2, A1, A3, now class E (a,b,c) and E(d-f) and F1 or F2)	4,951	3,606
Total	31,376	31,379

Table 1: Indicative Floorspace Schedules for Community and Business Uses

545. The table therefore shows that if there were not uptake for the school from KCC, then the employment floorspace from the site would be greater, and community floorspace would naturally be lower.

546. The breakdown of indicative proposed floorspaces can also be demonstrated as follows:

	Use Class (under previous use class order)	Development Including Primary School	Development Excluding Primary School
Residential (units)	C3	635	635
Residential floorspace (sqm)	C3	60,538	60,538
Mixed used in the village centre (sqm)	A/ B/ D	8,880	2,905
Of which is retail and community uses (sqm)	A/D	1,312	1,312
Of which is employment (sqm)	B	7,568	1,593
Total Other Employment Uses (sqm)	B	20,409	21,757
QinetiQ	B	6,016	6,016
Fort Area and Bunkers	D1	2,294	2,294

Table 2: Indicative quantum of land uses

547. The 2015 permission for the site entailed 450 homes, 27,000 sqm of B1/ B8 floorspace as well as village centre uses and a hotel.

548. While the adopted local policy relates to the redevelopment of the site for employment-led development, the previously emerging Local Plan sought instead to allocate the site for 'Housing and Mixed Use' development under emerging policy ST2. Policy ST2 and associated appendix 2 sought for the site to provide an uplift of 300 homes (above the 450 approved) alongside replacement employment provision of an equivalent scale to the level when the site was fully operational. This demonstrates the Council's aspirations, when preparing that plan, for the site to deliver increased housing alongside the employment uses.

Employment Uses

549. The scheme proposes up to 27,773sqm of business floorspace (GEA). This is an uplift from the 27,000sqm approved in 2015. The description of development now proposed describes the floorspace as being within the use classes B1a),b) and c) of the Use Classes Order. However, following revisions made to the Use

Classes Order from 1 September 2020, on implementation these uses would be treated as Class E (Commercial, Business and Service uses) and the uses would be flexible within that use class unless there were valid planning reasons why it would be appropriate to control the uses of some parts of the proposal in relation to the older use classes.

550. As above, policy EMP3 seeks to ensure the redevelopment of the site provides at least the number of jobs that the site accommodated immediately prior to the announced withdrawal of DSTL (one of the existing employers) from the site. Based on information provided by the applicant, the site previously accommodated 1,200 jobs.
551. The applicant's methodology for converting floorspace figures to jobs appears to be consistent with the Council's own Economic Needs Study 2016, which formed part of the evidence base for the previously emerging Local Plan. The Council's Economic Needs Study identifies that there is no exact science to convert floorspace to jobs forecast.
552. The impact on socio-economics including job creation is discussed within the submitted Environmental Statement, volume III part 6.1. The applicant considers the development would generate approximately 1,438 jobs directly, as well as additional multiplier jobs and those arising from household spending. These would arise from the development in its entirety, including the village centre uses and retained QinetiQ business on the site. This figure reflects the scenario if the school were delivered. The report shows a slight reduction in jobs if the school were not delivered, but still in excess of 1,200. The proposals would therefore achieve the aims of EMP3 in securing more jobs than previously existing on the site.
553. The Council's Economic Needs Study 2016 identifies Fort Halstead as a specific location for economic growth in the District, based on the 2015 permission. The report identifies at para 9.57 that B1 office and B2 space supply in the Sevenoaks area is limited and anticipates that there will be strong demand for space if it is developed. It anticipates that the demand for B1 space will come from local business and overall concludes that there would likely be high demand for the employment uses at Fort Halstead.
554. During the course of the application, Officers have been made aware of a potential future occupier of the employment land, which is a local business that has been in contact with the Council's Economic Development team. This suggests early interest in the employment land and confirms its attractiveness to potential occupiers.
555. On this basis the proposals would entail an uplift in jobs on the site, as required by policy EMP3. The jobs created by the development would be across a range of uses, including retail and education, and would serve the local economy positively.
556. As part of the employment benefits of the development, the development takes account of the existing employer on the site called QinetiQ who propose to consolidate their function to an area of land at the southern part of the site, referred to in the submitted documents as the "X enclave". The specific

nature of the works required to this area could be secured at Reserved Matters stage, or through the current application relating to this land, which is pending consideration.

557. In addition to the QinetiQ enclave, the parameter plans show that the new employment areas would be situated to the eastern side of the site, adjacent to Crow Drive. Positioning the employment uses on this side of the site would encourage future occupiers and users to access the site via Crow Drive, rather than Star Hill.
558. Alongside the improved connectivity of the site for pedestrians, cyclists and improved public transport connections discussed further below, it is considered that the site is capable of accommodating these new employment uses in a sustainable fashion and with better local connectivity than the existing uses on the site. The inclusion of village centre uses within the development, for example including retail and leisure facilities, would also support the employment uses.
559. The construction phases associated with the long build time of the development would also generate employment.
560. The details of phasing for the development have not yet been established. The conditions of the 2015 permission required details of the phasing to demonstrate that the development would be employment-led, thereby securing employment uses at an early stage. The applicant has submitted an indicative phasing plan for the development which suggests the early delivery of the village centre and employment uses to the east of the village centre. This is welcome. However, as EMP3 is of lesser weight than it was at that time, it is not considered necessary that such provisions are now secured.
561. From 1 September 2020 Class B1 of the use classes order was replaced with class E(g), and as such, unless restricted by a condition, could be moved into other uses within the E class without further planning permission. A condition is recommended to ensure that the B use classes shown are used for this purpose, to ensure that the Council's aspirations for employment uses on the site are met. It is relevant also that the application is informed and supported by an evidence base established on the earlier use class, and not the wider class E. Other uses may therefore have differing impacts.

Village Centre

562. The proposed village centre would be located centrally within the site, to the north of the Fort. This would incorporate a range of uses across the former A, B and D use classes which would serve to support the employment and residential uses on the site, and support the development as a sustainable community.
563. The central part of the village centre constitutes the "detailed" part of the application, where detailed drawings have been submitted for consideration. This shows the refurbishment and extension of buildings Q13 and Q14 (which is grade II listed) in connection with their change of use to offices, with a gym or community facility to the ground level of Q14. A contemporary atrium would

link the two buildings and a public open space would exist to the south of these buildings.

564. To the north east of Q13 and Q14 would be an area comprising retail and community facilities as a mixed use frontage neighbouring a village green. While this part of the development is proposed in outline only, the Design Principles document describes the environment which could exist here, and includes mandatory design principles for this area. Overall the mix of uses in the village centre, and their inclusion around areas of public open space, is welcome. This would provide a heart to the development to support the residential and employment uses. The creation of a village centre with potential to incorporate a variety of uses would help support and serve the local community and enhance the sustainability of the village centre and the community function, as supported by policy EMP3. The success of the village centre on this site is considered fundamental to the creation of 'place' in the development and will support and provide a catalyst for other employment uses. In order to ensure the mix of uses in the town centre, and to ensure these aims are achieved, conditions are recommended to bind those uses to the former use class. This is because other wider Class E uses could be harmful to the vitality of the centre and result in its purpose being diluted. It is therefore recommended that the uses of buildings Q13 and Q14, as well as other new blocks within the area defined as the 'Village Centre' within the Design Principals Document, are those referred to in the submitted documents, and that their permitted development rights for change of use to other classes are removed. This is also due to the EIA and evidence base supporting the application being based on these use classes, and not the wider Class E, which could result in different impacts for example on the highway.

School

565. The proposals include land that would be safeguarded for a 1 form entry primary school. This would be located to the east of Crow Drive on the eastern side of the site. The application proposes only the safeguarding of the land. It is intended that, if the school is required, it would be delivered by KCC.
566. The land for a school is included in response to KCC Education's response to the Sevenoaks Local Plan Regulation 19 consultation, where they initially raised the need for a 1 form entry primary school in the Halstead area, in connection with the residential site allocations in the previously emerging Local Plan. It is understood that KCC provided the applicant with potential design parameters for the school, which have informed the application. It is also understood that a Safety Review of the proposed drop off was undertaken to inform the proposals.
567. Despite the changes to the scheme made in July 2020 and the delays to the previously emerging Local Plan, the proposals continue to incorporate the land safeguarded for a 1FE Primary School. Should it transpire that the KCC Education do not require a Primary School then the land would become available for employment use. The mechanism to secure this would be included in the S106 agreement, which would be informed by discussions with KCC Education.

Healthcare Facilities

568. Under the previous application there was potential interest from Otford Medical Centre to provide a medical facility within the development. While the planning system cannot reasonably secure the occupation of a unit by Otford Medical Centre, or any other NHS facility, the Section 106 legal agreement can ensure that the relevant units in the village centre are offered to users such as healthcare services first, to enable these providers to consider their potential occupation first.
569. The inclusion of this requirement in the S106 is consistent with the earlier permission. The decision of whether or not those healthcare providers do occupy those units in the future is their own.
570. Infrastructure implications, and the relationship of the proposals with the Council's CIL are discussed further in the report below.

Housing

571. The application now proposes 635 houses, which is an increase of 185 from the extant 2015 permission. This has been reduced from 750 during the course of the application. The houses would make a valuable contribution to the District's Housing Stock.
572. The adopted Sevenoaks Core Strategy and ADMP planned for the delivery of 3,300 homes over the period 2006 to 2026 with the main site allocations being located around the urban areas of the District and on brownfield land (including Fort Halstead with 450 homes).
573. Paragraphs 73- 74 of the NPPF require the Council to identify a five-year supply of deliverable housing sites, including an appropriate buffer. As the result of the Housing Delivery Test for 2020 was 70%, the NPPF considers this as a significant under delivery of housing over the previous 3 years, and requires the application of a 20% buffer in line with para 73c). Furthermore, as the Core Strategy (2011) policies are more than five years old, the standard method figure for housing need must be used in place of adopting housing requirement for calculating the five-year housing supply. As a result of these factors the Council cannot currently demonstrate a five year housing land supply. As acknowledged in the Council's Housing Delivery Test Action Plan, the five year housing land supply calculation finds 2.6 years of supply of deliverable housing sites including a 20% buffer.
574. The NPPF puts an emphasis on the use of brownfield sites such as Fort Halstead to deliver housing. Para 117 states: *Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed need in a way that makes as much use as possible of previously-developed or brownfield land.*
575. NPPF para 118 goes on to state that planning policies and decisions should, amongst other things, *give substantial weight to the value of using suitable*

brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

576. As Fort Halstead is established brownfield and ‘previously developed land’, and has already been identified as suitable for housing by the extant permission and site allocation, and as the Council cannot demonstrate a five year housing land supply at this time, it is considered appropriate and welcome that the site accommodates a greater number of houses to meet the Council’s needs, subject to the other policy considerations discussed in turn below.
577. The implications of the ‘tilted balance’ described in paragraph 11 of the NPPF is discussed above and within the balance of considerations at the end of this report.

Play Space

578. The site is of an ample scale to provide adequate play spaces for use by future residents. This includes areas of open space that would be interspersed around the site as shown on the Green Infrastructure parameter plan. As with the previous permission, a condition is recommended to ensure that each phase which includes residential development includes provision for play facilities. The S106 would also include clauses relating to the future management of the open spaces and play spaces across the site, which could include field spaces or multi use games areas.

Housing Density, Mix and Affordable Housing

Housing Density

579. The NPPF states at paragraph 122 that planning decisions should support decisions that make efficient use of the land, taking into account: a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; b) local market conditions and viability; c) the availability and capacity of infrastructure and services- both existing and proposed, as well as their potential for future improvement and the scope to promote sustainable travel modes that limit future car use; d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens) or of promoting regeneration and change, and; e) the importance of securing well-designed, attractive and healthy places.
580. Policy S7 of the Core Strategy refers to housing densities in the District, however this is of limited relevance as ADMP policy EMP3 also defines the extent of development on this site. SP7, in summary, seeks a density of 75 dwellings per hectare (“dph”) in Sevenoaks and Swanley town centres; 40 dph in urban areas of Sevenoaks, Swanley and Edenbridge, and 30 dph in other settlements in the District. SP7 also reiterates that developments should make efficient use of land for housing, having regard to the character and location of the area.

581. Para 123 of the NPPF states that where there is an existing shortage of land for meeting identified housing needs (as there is in this case) it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential for each site.
582. Density calculations then should not be viewed in isolation, but in light of other considerations including the impact on the character of the area.
583. The proposed indicative densities for the development were amended as part of the revisions to the scheme in July 2020 and the densities have reduced as a result of the reduction in houses proposed.
584. The indicative densities vary across the site with the highest densities being closest to the centre of the site and the proposed village centre. The highest density is 45-55 dwellings per hectare, and the lowest density (proposed on land to the western side of the site) is 20-30 dwellings per hectare.
585. Under the extant 2015 permission, the proposed densities ranged from 25 dwellings per hectare to 45 dwellings per hectare. Therefore the proposed residential densities are not substantially different to those previously approved.
586. While the proposed densities are those which SP7 expects for settlements in the District, it is relevant that the proposals seek to support their own village centre and its success is in part reliant on the housing. The proposed densities are considered acceptable in this instance where a new village centre is proposed. Higher densities would be likely to have more impact on the character of the AONB, the heritage assets and transport issues.
587. Subject to consideration of the implications of the density on issues such as character, AONB, transport, and the heritage assets, the proposed density is considered acceptable in this instance. As the site already has an extant planning permission for 450 homes, and is accepted as previously developed land, it is considered that the proposals would make efficient use of the land, compliant with the aims of the NPPF and SP7 of the Core Strategy.

Housing Mix

588. Policy SP5 of the Core Strategy requires that new development contributes a mix of housing types, taking into account evidence the existing pattern of housing in the area, evidence of local need and site specific factors. At this time the most up to date evidence of need for housing mix is described within the Strategic Housing Market Assessment (SHMA, 2015).
589. At this time the proposed housing lies within the outline part of the application, and therefore the exact mix of housing sizes has not been established. This would be dealt with through any subsequent Reserved Matters applications.

590. The applicant in their Planning Statement has acknowledged the District's housing needs and that the development has the ability to contribute a mix of dwellings to reflect the District's need.

Affordable Housing

591. The Core Strategy states that in the case of developments of more than 15 units, 40% of the total number of units should be affordable. It states that 65% of the affordable housing should be social rented.

592. The Council's Strategic Housing Market Assessment (SHMA) 2015 is the most recent study on housing demand in the District. This identifies a need for 24% of affordable homes to be intermediate and 76% to be social or affordable rent.

593. Policy SP3 of the Core Strategy has been found to be out of date due to more up to date national policy and there is no up to date site allocation here where the viability was tested. As such, National Planning Policy Guidance accepts that viability testing can take place and it acknowledges that planning obligations can provide flexibility in ensuring planning permission responds to site and scheme specific circumstances. Government guidance on viability was updated in September 2019.

594. Para 64 of the NPPF states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership (as part of the overall affordable housing contribution of the site).

595. Paras 65 and 66 of the NPPF refer to housing requirement figures and how this issue may be considered in areas where strategic policies for housing are out of date. In these circumstances, it states that considerations should take into account factors such as the latest evidence of local housing need, populations and the most recently available planning strategy for the area.

596. In this case the applicant has suggested that a 40% contribution to affordable housing is not viable. The applicant submitted a viability report to support this, and based on their viability assessment had put forward two options for the provision of affordable housing on site. These are as follows:

- A 17% affordable housing contribution, with a mix of 35% intermediate (shared ownership) and 65% affordable rent, or if the mix were inverted;
- A 21% affordable housing contribution with a mix of 65% intermediate (shared ownership) and 35% affordable rent.

597. For the reasons discussed below, a contribution of 20% with a policy compliant mix of 35% intermediate and 65% affordable rent has been agreed.

598. The applicant's viability report has been tested robustly by Dixon Searle Partnership on behalf the Council.

599. Given the unique nature of the site, in terms of its occupation by DSTL, long build period, and the planning constraints affecting the site, the development costs put forward by the applicant were also independently reviewed by a

Costs Consultant, EMRC, on behalf of the Council. The Costs Consultant identified a number of differences between the principles applied to pricing on both sides. As a result of discussion on these points, the development costs informing the viability report were reduced notably, revealing that there may be greater scope for affordable housing on the site. The applicant has accepted this and the viability assessment was amended on this basis.

600. Dixon Searle Partnership, acting on behalf of the Council, raised further queries regarding the timings and phasing of the development, which could have a notable impact on viability and the ability of the scheme to contribute to affordable housing. In particular, discussions were held around the long period of time between commencement of development and the first sales and timing of CIL payments. It was the recommendation of Dixon Searle Partnership that there remained some potential variations with the scheme, but this was not unexpected with a scheme of this nature. To reflect those existing potential variations which could improve the viability, they recommended that the applicant increase the affordable housing offer to a minimum of 20% provision with a policy compliant tenure mix and with a review mechanism to capture any potential uplift in viability in the future.
601. The applicant has agreed to this level of provision and this would be secured by the S106 legal agreement. Overall, it is considered that the scheme is policy compliant in this regard and the application sufficiently demonstrates that a contribution of 40% is not viable, but that the maximum reasonable amount is secured. This is compliant with the aims of policy SP3 and the NPPF.
602. As the affordable housing contribution in this case is based on future forecasting and as the sale of homes is not anticipated for a number of years following commencement of the development, it is reasonable that the viability is tested again to establish whether the affordable housing contribution could be changed. This review mechanism has been agreed in principle with the applicant and would form part of the S106 legal agreement. The applicant has agreed to both an early and a late review during the construction process.
603. The extant 2015 permission secured a 20% contribution to affordable housing with a mix of 65% affordable rent units, and 35% shared ownership units, with a mechanism in the S106 for the mix to be amended through further viability testing. The affordable housing now proposed is therefore less than that previously secured. This is understood to be primarily due to changes in economic forecasting at the time of the viability testing.
604. Under current circumstances, if the development were to be built out at the current time, no affordable housing contribution would be possible. This is primarily due to the unique build costs associated with the development. However the 17% or 21% contributions were put forward by the applicant as they foresee that the economy will grow and the agreed affordable housing contribution therefore relies on an uplift in the market. The applicant has agreed to review mechanisms (to be included in the S106) to capture any additional uplift if economics were improved which would result in the affordable housing contribution being increased.

605. It is relevant that the viability testing for Fort Halstead was carried out prior and during the Coronavirus pandemic and there remains uncertainty regarding its impact on financial markets.
606. As above, a review mechanism would be secured by the S106 agreement to ensure that viability is tested again during the development stages, to establish if there is a change in the amount of affordable housing that the scheme can afford.

Green Belt Implications

607. The NPPF identifies that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence.
608. Paragraph 143 of the NPPF tells us that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. In paragraph 145 of the NPPF, we are reminded that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt, but that there are exceptions to this. Most notably to this application this includes:

- g) limited infilling or the partial or complete redevelopment of previously developed land, which 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.

609. This clause goes further than the requirements of policy EMP3 and the requirements for Major Developed Sites to have no greater harm on the Green Belt than the existing development. However, as the NPPF is the most up to date part of the development plan, it is against this paragraph that the development under consideration must be assessed.

610. The site is accepted to fall within the definition of 'previously developed land' contained within the glossary to the NPPF. This defines it as:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built up areas such as residential gardens, parks, recreation grounds and allotments, and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape”.

611. The lawful development certificate of 2004, confirmed that the lawful use of the site is for B1 purposes (being research and development, offices and light industry) with ancillary uses including B8 (storage and distribution), canteen, energetic material testing and a social club. These uses fall within the definition of previously developed land and it has been accepted that this comprises all the land contained within the red line boundary of the 2004 lawful development certificate. This covered the majority of the current application site and all the existing built forms on the site. This position was similarly accepted at the time of the 2015 planning permission.
612. This report therefore considers whether the proposals would cause less than substantial harm to the openness of the Green Belt.
613. Openness is an essential characteristic of the Green Belt and is different from visual impact, although it can have a visual element. Openness is about freedom from built form, and can have visual as well as spatial components.
614. Case law has informed us that consideration of openness is not narrowly limited to a volumetric approach, but that it is “open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular factors of a specific case” (Turner v. SSCLG). Openness was also found to be capable of having a visual dimension.
615. In this case it is considered relevant to consider the visual as well as the spatial effects of the impact of the development on the Green Belt.
616. The site at present comprises a significant extent of development which is spread across much of the site. The open spaces which exist between the buildings are predominantly hard surfaces comprising access roads, parking and turning areas. The site was previously understood to accommodate around 350 buildings, although some of these have now been demolished.
617. Under the 2015 planning permission it was concluded that the proposals would not have a greater impact on the openness of the Green Belt than the existing development. That development comprised 450 homes and 27,000sqm of business floor space as well as other uses, and was an outline permission only.
618. In terms of comparison of floorspace, the existing building footprint confirmed by the 2004 lawful development certificate (but not accounting for more recent demolitions on the site) was 82,168sqm. The proposed development would comprise up to 27,773sqm GEA of business space, as well as 635 dwellings, mixed use village centre and potentially a new primary school, for which land is proposed to be safeguarded. Other than the business floorspace, the other uses have not been defined in terms of their floor area or footprint at this stage because they form part of the outline proposal. Therefore a direct comparison of existing and proposed floorspace is not available and we would only obtain the exact proposed floorspace at the ‘reserved matters’ stage.
619. As part of the amendments to the current planning application, the number of proposed houses has been reduced and development from the heli-pad area (to the east of Crow Drive) no longer contains proposed development. These

amendments have further reduced the extent and spread of built form proposed on the site.

620. The applicant states (within paragraph 4.1 of the Planning Statement Addendum) that the approximate building footprint for the proposed development is 43,796sqm including a potential primary school. The applicant has stated that this is an indicative figure based on an indicative range assuming standard house type and commercial floorspaces. This figure would represent a significant reduction in the footprint of built form on the site.
621. The parameter plans (to which the applicant would be bound if permission were granted) demonstrate that the footprint of development would be set away from the site boundaries, reinstating areas of open spaces around the development which also forms the buffer for the ancient woodland. The parameter plans and design principles show the inclusion of green spaces throughout the development which form an integral part of the site layout. Therefore the proposals would effectively break up the existing built forms which currently sprawl across much of the site, and create a more open feel to the site.
622. In terms of building heights, the proposed parameter plan for building heights now shows a maximum building height of up to three or four storeys, where four storeys are proposed to be used only for landmark buildings within the village centre in the centre of the site. Prevailing building heights across the rest of the site, outside the village centre, are those typical of a residential setting. By comparison the existing buildings on the site vary significantly in their bulk and height, and include large warehousing enclosures. One of the tallest buildings on the site is building N2 close to the northern site boundary and properties on Armstrong Close, which exceeds 16m in height. Other buildings of between 12 and 15m in height exist sporadically across the site.
623. With regard to its visual element, it is relevant that most of the application site is currently within the secure compound and is not accessible to members of the public. Public rights of way, for example, do not extend through the site, and the extensive woodland surrounding the site, limits the visual contribution that the site currently makes to the openness of the Green Belt. Cumulatively the changes to the built forms on the site, and the opening of the site for public access would provide improvements to the visual dimension of openness within the site. The proposed demolition of some of the substantial buildings close to the northern edge of the compound, in particular Building N2, and replacement with a lower scale of development would also improve the perception of openness on the site when viewed from Crow Drive and Armstrong Close.
624. The proposals retain those areas which make the most significant visual contribution to the openness of the site with these remaining undeveloped, including the sloped grassland to the southern edges of the site, and areas adjacent to Star Hill Road on the western and north western side of the site.
625. In addition to the specific circumstances of these current proposals, it is useful to note the findings of the Council's "Green Belt Assessment" of January 2017, which formed part of the evidence base for the previously

emerging local plan. While that Local Plan is not being afforded weight in decision making, the Green Belt Assessment is useful as an indicator of the performance of the site against the purposes of including land within it as defined by the NPPF in paragraph 134.

626. Within the Green Belt Assessment it states “...an identified sub-area in the south of the Parcel incorporating the Fort Halstead site may score weakly against the NPPF purposes if considered alone. It constitutes an extensive area of existing encroachment and possesses a semi-urban character (purpose 3). It is generally inward facing, separated from the wider countryside by extensive, dense planted buffers, thus limiting its role in preventing coalescence between settlements (purpose 2). Further its distance from the edge of Greater London and its status as a standalone built-up area means that it would not constitute ‘sprawl’ (purpose 1).”
627. Taking into account these various elements, being: the sprawl and extent of existing development and hard surfaces across the site; the development approved by the 2015 permission which was considered not to have a greater impact on openness than the existing, and; the low performance of the site against the purposes of including land within the Green Belt in the NPPF, it can be concluded that the proposed development would not cause substantial harm to the openness of the Green Belt.
628. The proposals include provision of affordable housing on the site, which meets an identified need in Sevenoaks District. This is discussed in more detail above.
629. Overall, it can be concluded that the development is appropriate development in the Green Belt by definition under NPPF paragraph 145(g) as it would not cause substantial harm to the openness of the Green Belt and would contribute to meeting an identified affordable housing need within the District.

Heritage Assets: Scheduled Ancient Monument of The Fort; listed buildings on the site; area of archaeological potential and non-designated heritage assets, and their settings

630. The Planning (Listed Buildings and Conservation Areas) Act 1990 requires consideration of whether the application would affect any listed building or its setting. In doing so decision makers must ‘*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*’. This statutory duty requires decision makers to give ‘*considerable importance and weight*’ to the desirability of preserving the buildings, settings and features of architectural or historic interest.
631. Section 16 of the NPPF relates to the conservation and enhancement of the historic environment and requires heritage assets to be conserved in a manner appropriate to their significance so they can be enjoyed for the contribution to the quality of life of existing and future generations.
632. NPPF para 192 states that in determining applications, local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent

with the conservation; the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic viability; the desirability of new development making a positive contribution to local character and distinctiveness.

633. At para 193 it advises that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Other paragraphs of the NPPF are also applicable.
634. At a local level, policy SP1 of the Core Strategy expects heritage assets and their settings to be protected and enhanced. Policy EN4 of the ADMP confirms that applications that affect a heritage asset will be permitted where the development conserves or enhances the character, appearance and setting of the asset.
635. In order to assess the proposal against the statutory test, policies and guidance, it is necessary to assess key features and significance of the heritage assets, identify what harm may be caused and appraise how the impacts of the proposal will affect the heritage assets and their settings and the features of historic or architectural interest. It can then be established whether those impacts neutral, positive or negative.
636. There are five designated heritage assets on the application site; Scheduled Ancient Monument - Fort Halstead; Listed Building - Experimental Filling Shed (Grade II); Listed Building - Bomb Chamber (Grade II*); Listed Building - Detonation Chamber (Grade II*); Listed Building - Q14 (Grade II)
637. With the exception of building Q14, the other designated heritage assets are located within the outline part of the application and this outline application does not physically affect the fabric of those listed buildings or the scheduled ancient monument. The detailed part of the application includes listed building Q14 and its immediate setting. This is discussed in turn below. A separate listed building application is also currently under consideration relating to this building.
638. Where some works around the Fort may require Scheduled Ancient Monument Consent, this is a separate process administered by Historic England. If the works to the other listed buildings require listed building consent this would also be subject to separate applications in due course.
639. The designated heritage assets are considered in turn below in terms of their significance, setting and the impact of the proposals on them.

Scheduled Ancient Monument - The Fort

640. Assessment of Significance

641. The Fort is a Scheduled Ancient Monument and this designation means it is of national importance. It was built as part of a scheme called London Defence

Positions in the 1890s. It was one of 13 mobilisation centres designed to defend London from invasion. It was the largest and most expensive to build. This scheme lasted approximately a decade and then during WW1 a laboratory was built outside the Fort. The Government owned the site until 1921 when sold off and became a Territorial Army, Girl Guide and Boy Scout camping ground and accommodation for destitute refugees.

642. The site went back into government hands in 1938 when Fort Halsted became the separate Projectile Development Establishment and construction began on the wider site outside of the Fort. This comprised of specialist explosives fillings stations, a large laboratory, workshops, administration buildings, welfare facilities as well as air raid shelters and a housing estate for the War Department police force.
643. The site has expanded in the twentieth century but the use has remained as explosive-based. The Fort was and still is accessed via a mass concrete causeway though the surrounding concrete lined ditch only partially remains. Within the Fort confines are three listed structures (see below).
644. The site was re-evaluated by Historic England (formerly English Heritage) in 2013 and in line with recent designation descriptions is clear about the nature, extent and importance of the significance of the site;
645. Rarity and form: one of 13 purpose-built mobilisation centres nationally erected in the late C19. Fort Halstead was the largest (and most expensive) built and is one of only four designed for artillery deployment. Also, a highly significant site in terms of mid-late C20 rocketry and atomic bomb research and development;
646. Survival and diversity: a mobilisation centre which survives in largely intact form. Although a section of late C19 ditch has been infilled, this survives intact as a buried feature. The fort also includes evidence for the site's later research and development role with limited alteration of some of the casements and magazines for this later use; this modification adds to the fort's interest;
647. Documentation: the site has the potential to significantly enhance our understanding of the development and operation of the late C19 mobilisation centres constructed to defend the capital, also to aid our understanding of the nationally significant atomic bomb research and development undertaken here;
648. Group value: with listed buildings within and immediately outside the Fort representative of the site's *later* role as a military research establishment.
649. This gives Fort Halstead evidential and historic value using the criteria set out in 'Conservation Principles' (English Heritage, 2008).
650. Setting
651. The established setting is loosely enclosed by other development that is associated with the historic evolution of the site. This is low level and

intermittent. The original setting has been eroded by sporadic development but the original cottages and store still remain. However, the later development of the Q buildings and the X buildings and the relationship between these buildings reflect the significance the Fort has in the twentieth century weapons research. There are long views towards the Fort from the Main Entrance but due to dense tree growth it is not visible from the south in surrounding long views. The Fort is covered in tree and shrub growth which it unlikely to have been deliberately planted.

652. Impact of the proposals on The Fort
653. The proposals are that part of the Fort is turned into a heritage attraction with the potential to be open for 30 days per year as a minimum. The listed buildings are proposed to be used to illustrate a particular part of the Fort's history with the Experimental Filling Shed being repaired and re-furbished and converted into a Heritage Interpretation Centre.
654. This proposal and its feasibility would be investigated further in a manner to be secured via the S106 agreement. The other buildings within the Fort are to be offered as workshop space. These proposals will have a neutral impact on the significance of the Fort and the listed building which are historically for weapons research and which will no longer fulfil that use.
655. The wider development that is proposed falls outside of the Fort and does not impact on the setting of the listed buildings. The works to the Fort and the listed buildings will have a positive impact on the character and special interest by allowing the public access and better revealing the significance.
656. The wider demolition schedule will see the loss of over 260 of the 300 buildings on the site. The Fort is protected by an almost complete buffer of existing buildings with which it has group value as identified in the Listing Description as are those QinetiQ buildings which are not proposed for demolition. The proposal for light industrial use in the near vicinity reflects the historic use of the area and sits comfortably with the established character of the site. A security fence is proposed around the QinetiQ enclave 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.
657. The wider scheme for housing development sees greater density housing located near the Fort and the remaining Q buildings. This reflects the traditional pattern of development on the site. Lower density housing radiates away from this core also in a manner similar to the historic pattern. There will also be increase soft landscaping to ensure there is a sympathetic context. These proposals are not harmful to the significance of the Fort and the re-development will have a neutral impact effect on the significance of the Fort.

Listed Building - Experimental Filling Shed Building F11 (Grade II)

658. Assessment of significance
659. This building is located within the Fort. It is Grade II listed, of national importance and this means it is considered to be of special interest warranting

every effort to preserve it (Principles of Selection for Listed Buildings, DCMS March 2010)

660. The Experimental Filling Shed was designed and built in 1938 and is probably the earliest surviving building in the new research establishment. This building is a two storey concrete-framed building with a fletton brick skin. It has an L-shaped plan form. There is a metal stair and covered first floor walk-way to the front elevation. It was designed to allow the filling of cordite rocket motors. It was later dubbed 'Poole's Folly' as there are questions as to whether or how much it was used for its intended function. This is considered to be the earliest surviving purpose-built rocket-related building in England.
661. The listing description describes its significance as such:
Rarity and early date: this is the earliest surviving purpose-designed building associated with rocketry research and development nationally. Most buildings associated with this area of research are of post-war date rather than pre-war as here; Design and form: the building's function is legible through its form, the internal vertical bays to accommodate the filling of 9 foot rocket casings survive particularly well; Historic interest: F11 is significant as part of the early research programmes at Fort Halstead under the Projectile Development Establishment and, given the specialist nature of this work, is of national interest.
662. This gives the Experimental Filling Shed evidential and historic value using the criteria set out in 'Conservation Principles' (English Heritage, 2008)

Listed Building - Building F16 (Bomb Chamber) and F17 (Detonation Chamber) (Grade II)*

663. Assessment of significance
664. These buildings are located within the Fort. Buildings F16 and F17 share a listing description and are Grade II* listed which means they are considered by the Secretary of State to be particularly important buildings of more than special interest. (Principles of Selection for Listed Buildings, DCMS March 2010)
665. The Bomb Chamber was designed in July 1947 and with buildings F17 and F18 forms the key group of structures within the fort relating to atomic bomb research and development. The speed with which it was designed - only two months after the High Explosives Research Establishment was set up at Fort Halstead - is a testament to the importance of and need for this structure in the context of that body's research and development. This is a bi-partite building of reinforced concrete and brick with an attached single storey structure in reinforced concrete for the armoured laboratory.
666. The Detonation Chamber is a bi-partite building of reinforced concrete and brick. To the south and west it is a single storey flat roofed structure housing the armoured laboratory (in reinforced concrete); to the south and east it is faced in red brick English bond, but the north elevation is in concrete (the west elevation was not inspected). The laboratory has a large and prominent T-shaped funnel to its flat roof. The main access is via folding wooden doors in the east elevation. A porch has been added to protect a south pedestrian

doorway. At its north-east corner the building rises to two storeys, again in red brick English bond. All windows are metal-framed casements with concrete heads.

667. The listing description describes the reasons for listing both these buildings thus;
Rarity: these are unique buildings, specifically designed for the development of Britain's first atomic bomb; Historic interest: both are vital buildings in our understanding of the nation's atomic bomb research and development, a top-secret programme under the aegis of the High Explosives Research Establishment which through its work at Fort Halstead, and sister sites, was to prove one of Britain's major scientific breakthroughs in the field of military armament; Design and form: the original function of both buildings is legible through their specialised form and both remain little altered from their original design.
668. This gives Fort Halstead evidential and historic value using the criteria set out in 'Conservation Principles' (English Heritage, 2008)
669. Setting (Experimental Filling Shed, Bomb Chamber and the Detonation Chamber)
670. These buildings are located within the Fort and sit enclosed in the central core. The site is grassed and there is a wooded perimeter on the scheduled ancient monument. There is limited visibility into and out of the site but also there are restricted views between the buildings because of the casement traverses. This is the character of the setting and positively contributes to the special interest because it reflects the unusual evolution of the site from a mobilisation centre to specialist weapons testing facility.
671. Impact of proposals (Experimental Filling Shed, Bomb Chamber and the Detonation Chamber)
672. The physical setting will remain largely unchanged, although heritage interpretation boards are proposed within the site. The listed buildings will be refurbished (under separate listed building consents) and the Experimental Filling Shed is proposed to become a display area for the Heritage Interpretation Centre. The Heritage Interpretation Centre would allow public access to the site and an opportunity to understand the history of these designated heritage assets and the wider site. The applicant has proposed a Heritage Trail around the site to better reveal the special interest of the site. This includes the retention of some of the M magazine stores to better reveal the history and evolution of the site to visitors. There is no harm to the significance of these buildings and the proposals will have a positive impact.

Listed Building - Building Q14 (Grade II)

673. Assessment of significance
674. This building sits a short distance outside of the Fort. It is Grade II listed and this means it is of national importance and considered to be of special interest

warranting every effort to preserve it (Principles of Selection for Listed Buildings, DCMS March 2010).

675. Q14 was a purpose-built structure designed for the assembly of the prototype warhead and its ballistic casing. It was the only place where all the component parts of the bomb were brought together and where a complete model was assembled, although inert model wooden replicas were used instead of the live explosive components. (The colloquial name for Q14 was the 'RAF Building', illustrating the close collaboration between Penney's team and the end user, the RAF.) It is not known where the electronic components of the trial devices, which were then taken to RAF Woodbridge (Suffolk), were assembled although Q14 is a possibility.
676. The listing description describes its significance thus;
Historic interest (personnel): of considerable significance nationally for its association with William Penney, Chief Superintendent of Armaments Research, who led Britain's atomic bomb development programme here and which association is celebrated by a memorial plaque; Historic interest (bomb development): the only building nationally where the prototype bomb was put together and thus instrumental in the detonation of Britain's first atomic bomb in 1952; Form and design: purpose-built for Britain's atomic bomb development programme. Although a functional building without architectural embellishment its form expresses the secrecy surrounding the programme, being blind on the public-facing side, and which retains its original workshop space and support accommodation for the assembly of the prototype warhead and ballistic casing; Group value: for its associations with Fort Halstead and the contemporary buildings within and outside of the mobilisation centre which were also part of the atomic bomb development work.
677. This building has evidential and historic value as defined by the criteria set out in 'Conservation Principles' (English Heritage, 2008)
678. Setting
679. Building Q14 sits outside the Fort but within close proximity. Aside from the immediate buildings the Fort and A10, A13 and A14 provide historical context. It is experienced as part of a group of buildings, some contemporary and some more recent. Adjacent buildings Q13, Q12 and Q1 are broadly contemporary and through their architecture and material composition provide an appropriate historic setting that contributes towards the significance. It is not clearly visible in long views.
680. Impact on Building Q14
681. Building Q14 and its immediate setting will be altered in a different way to the extant 2015 permission. In an amendment to this application, two of the contemporaneous surrounding structures (Q1 and Q12) that are considered to form an important part of its setting will be demolished. Q13 will be retained as per the previous scheme. The substantial demolition of the entire site will have a negative impact on the significance of all the designated heritage assets on the site because of the functional relationship and context. They have historic significance based on their role in weapons research and this role is

intrinsically linked to the wider site. Q14, located outside of the Fort is part of a group of contemporary buildings and the impact of the demolition of the wider site will also have a visual impact on its setting. The development of the wider site was low level, organic and sporadic and was developed as a need arose. The loss of Q1, identified as a non-designated heritage asset and Q12 are considered to impact on the setting of the designated heritage asset. However, the masterplan has been developed in order to retain the elements that make the greatest contribution to the setting and also to create a vibrant, new sustainable community and a long term sustainable use for Fort Halstead. The wider development will also retain a similar use of weapons research, light industrial and housing. In terms of the NPPF it is considered to be of less than substantial harm.

682. Building Q14 and the structures that form an important part of the setting (Q1, Q12 and Q13) are to be retained as part of the proposals but their setting altered. The substantial demolition of the entire site will have a harmful impact on the significance of all the designated heritage assets on the site because of the inter-relationship and context. They have historic significance based on their role in weapons research and this role is intrinsically linked to the wider site.
683. Q14, located outside of the Fort is part of a group of contemporary buildings and the impact of the demolition of the wider site will also has a visual impact. The development of the wider site was low level, organic and sporadic that was developed as a need arose. The proposals are considered to be of minimal harm because they still locate the building within a context of related buildings (Q1, Q12 and Q13) which are contemporary to Q14 and that also reflect the materials and design of the period and better reveal the significance of Q14. The wider development will also retain a similar use of weapons research, light industrial and housing. In terms of the NPPF it is considered to be of less than substantial harm.
684. The demolition of the immediate buildings of Q8, Q11 and Q3 which are not in themselves considered to be of special interest affects the immediate setting of Q14 and the Fort. It will change the relationship between the two areas by opening up the flank elevation of the Penney building (Q14). The proposals will see a new village hub created and a square formed along this elevation. This will help to better reveal the significance by the improvement of the relationship between the Fort and Q14. This is considered to be of less than substantial harm but the impact of the final proposals will have a positive impact.

Undesignated heritage assets

685. Heritage assets are defined by the NPPF as being: “A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest”
686. The following buildings are considered undesignated heritage assets on the site;

F14 & F18

687. These buildings are located on the Fort and are not listed or covered by the Scheduling of the Fort that specifically excluded buildings post 1900. Building F14 was built in 1915 and it is the only surviving representative of the period. It was also used as the residence of the private owner in the interwar period. It is part of the setting of the listed buildings and the scheduled ancient monument it has historical significance.
688. Building F18 was built to support the work of William Penney's atomic bomb research. It has served as a workshop and administration building. It is of historic significance and like Building F14 makes a positive contribution to the setting of the listed buildings and the Scheduled Fort. These buildings are to be retained as part of the proposals.

A10

689. This building is located near to the Fort and is a substantial three storey structure dating from 1936-1944. It is flanked by bays of single storey ranges. It was labelled the 'Tube Process' building in 1944 and thought to be involved in shell development. It is the principle building in Area A and derives historical interest from direct associations with the highly secretive and nationally important work of ARD and CSAR. It is a utilitarian building but there is some architectural detailing including recessed window bays and solid course lintels.
690. This building positively contributes towards the setting of the listed Q14 and the scheduled Fort as it represents a principle building in the work that was carried out by Penney. This building is to be retained as part of the proposals.

A11

691. This is a long rectangular building was built between 1936 and 1944 by German Prisoners of War. It was an office for CSAR so has a historic connect to the work of Penney. There is some significance from its historical connections with the Prisoners of War and it forms a neat group with A10, A13 and A14. It makes a positive impact on the setting of the scheduled Fort. This building is to be retained as part of the proposals.

A13 & A14

692. These building are contemporary to the Fort (late 1890s) and were built as caretaker's cottages and a tool store. These enhance the setting of the Fort as they demonstrate ancillary building outside of the dominant earthen works. They have historic significance and make a positive contribution to the setting of the scheduled ancient monument. They are to be retained as part of the proposals.

All other building in the Fort Area

693. These buildings are located in the Fort and are ancillary to the use. They represent a variety of uses and date from 1892 through to 1950s. They are

make a positive contribution to the setting of both the listed buildings and scheduled ancient monument. These buildings are proposed to be retained.

Q1, Q3, Q4, Q4.1, Q13

694. These buildings are part of the CEAD buildings used by Penney and have an obvious function. They date from 1936 - 1949. These are proposed to be removed except for Q13.

X3, X4, X6, X7, X8, X9, X11, X12, X13

695. These are structures relating directly to the weapons and firing. They are magazines and firing and testing chambers, they date from 1936 - 1944 and are proposed to be retained.

696. A condition is recommended to secure details of the protection measures for the retained buildings during the course of the development. This is consistent with a condition of the 2015 permission.

697. Overall assessment on the Scheduled Ancient Monument and listed buildings:

698. As under the 2015 permission, a Heritage Interpretation Centre is proposed as part of a heritage attraction for the site. This continues to be proposed as part of this scheme and is welcome in heritage terms. The details of this Centre and its management would again be secured by the legal agreement. The applicant no longer proposes to carry out restoration works to the moat around the Fort, while this was a heritage benefit it is not considered necessary to make the proposals acceptable.

699. The Council's Conservation Officer and Historic England have raised concern for the draft Management Plan submitted with the application. This would therefore need to be revisited in line with the recommendations of Historic England. As with the 2015 permission, the final Conservation Management Plan would be secured by the S106.

700. It is relevant that Historic England originally objected to the application when the proposal was for 750 homes. Their concerns related primarily to the village centre part of the development and design, proximity and relationship to the Fort. The amendments to the scheme in July 2020 entailed the amendment of building heights and additional justifications in heritage terms.

701. The comments from Historic England of August 2020 identify that the proposals would cause some harm to heritage significance, but that they would also bring considerable heritage benefits through securing a sustainable use for the site. On this basis they now raise no objections to the scheme.

702. This sentiment is shared by the Council's Conservation Officer who concludes that the proposals would cause less than substantial harm to the heritage significance of the site. In line with para 196 of the NPPF, where less than substantial harm occurs to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. This harm is weighed

against the public benefits in the planning balance section of the report below, however in summary it is considered that there are notable public benefits in this case including putting the heritage assets to a viable use after DSTL leave the site.

703. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on a local planning authority, in considering development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting, or any features of architectural or historic interest it possesses. It can be concluded that, on balance, the proposals would preserve the listed buildings and their settings, subject to conditions to safeguard these heritage assets and secure their ongoing appropriate management.
704. *Archaeology*
705. The Archaeology Officer at KCC considers that although there are some heritage concerns in terms of the level of information submitted in regard to archaeology on the wider site, the necessary further assessments can be undertaken prior to the works on the phases of the development. Conditions have been recommended to ensure appropriate consideration of the archaeological landscape and its protection during each phase of development.
706. Other measures and mitigations, including the Conservation Management Plan referred to by the Archaeology Officer would form part of the requirements of the S106. Subject to these provisions the development would conserve archaeological remains, compliant with the aims of EN4 and the NPPF.

Visual, Landscape and AONB impacts

707. The NPPF states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve (para 124) and provides criteria in para 127 that development should meet in order to achieve well-designed places.
708. The Countryside and Rights of Way Act 2000 (CROW Act) states that the Local Planning Authority should conserve and enhance Areas of Outstanding Natural Beauty. Designating an Area of Outstanding Natural Beauty protects its distinctive character and natural beauty and can include human settlement and development. The CROW Act makes clear that insofar as it refers to the conservation of the natural beauty of an area, this includes a reference to the conservation of its flora, fauna and geological and physiographical features.
709. Policy EN5 of the ADMP states that the Kent Downs and High Weald Areas of Outstanding Natural Beauty and their settings will be given the highest status of protection in relation to landscape and scenic beauty. Proposals within the AONB will be permitted where the form, scale, materials and design will conserve and enhance the character of the landscape and have regard to the relevant Management Plan and associated guidance. The NPPF also states that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs.

710. Para 172 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas. The scale and extent of development in these areas should be limited.
711. Para 172 of the NPPF also states that planning permission should be refused for major development in AONBs other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. It states that this should include 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.
712. The Kent Downs AONB Management Plan 2014-2019, that covers the area that includes this site, provides evidence of the value and special qualities of the areas. A Kent Downs AONB Management Plan for the period of 2021- 2026 has also been published. This has not yet been adopted by Sevenoaks District Council, but may be adopted following the Committee's resolution.
713. The special characteristics and qualities of the AONB identified in the 2014-2019 Management Plan that are relevant here are identified as:
- Dramatic landform and views. Eg South facing slopes of chalk and greensand; Long distance panoramas across open countryside; Natural and man-made features creating distinctiveness at a local level.
 - Biodiversity-rich habitats. Eg Rich mosaics of habitats, plant and animal communities of national and local importance; Habitats include semi-natural chalk grassland, ancient semi-natural woodland, acid grassland. Sensitive management of these habitats is essential to the survival of the important biodiversity heritage and landscape quality.
 - Farmed landscape.
 - Woodland and trees. Eg Broadleaf and mixed woodland framing upper slopes of the scarp and plateaux tops; Ancient woodland supporting nationally important plant and animal species; Large areas of sweet chestnut coppice.
 - A rich legacy of historic and cultural heritage. Eg Remains of millennia of human activity including Neolithic, Bronze Age, Iron Age and Roman remains; Impact on landscape includes wood banks, hedges, distinctive architecture and diverse local materials.
 - Geology and Natural resources. Eg Soils that are important to the farming sector; Water resources to support rivers and wildlife; Some countryside tranquil and remote offering dark skies and peace.

714. In addition the 2021- 2026 Management Plan also identifies that Heritage Coasts (not applicable here) and Tranquillity and Remoteness are also special components, characteristics and qualities of the Kent Downs AONB.
715. The AONB Management plan 2014-2019 also includes quality of life characteristics and qualities:
- Vibrant communities. Eg A living, working landscape shaped and managed by people.
 - Development pressures. Eg Severe development pressure, including from new infrastructure and recreational use.
 - Access, enjoyment and understanding. Eg High demand for access and recreation to be balanced with protecting special characteristics of AONB.
 - Dense network of Public Rights of Way.
 - Access benefits health and well-being of local community.
 - Improving understanding to protect value, conservation and enhancement of landscape.
716. The 2021- 2016 AONB Management Plan also identifies the following additional quality of life characteristics and qualities:
Public Perception of the Kent Downs- which rated the most important components of the Kent Downs AONB through public surveys, of which Chalk Downland and Woodland emerged as the most important components; scenery and views and wildlife to be the most valued features; prevention of illegal activities and conserving wildlife as the priorities for action, and environmentally friendly farming techniques and improvements to sustainable transport to be actions to improvement the enjoyment of the AONB.
717. The extent to which this proposal may comply with the special characteristics and qualities of the Kent Downs AONB is considered below, noting that other parts of the report refer to some of these factors in more detail. The requirements of para 172 of the NPPF are discussed later in the report as they are informed by other considerations which are discussed in turn once all key matters have been considered.
718. The majority of the proposals are in outline form only at this stage. In contrast to the 2015 planning permission, the current application is accompanied by a Design and Access Statement and Design Principles document, which provide extra detail and clarifications of the likely character and appearance of the development on the site. This is in response to the need for the development to achieve compliance with the statutory tests relating to the character of the AONB and the abundance of heritage assets on the site.
719. With regard to the statutory tests for such development in the AONB, it is relevant that the 2015 planning permission was subject to the same test of the NPPF and was concluded to both conserve and enhance the special landscape character. The AONB Unit similarly objected to the scheme in 2015, concluding, contrary to Officers recommendation that the development would not conserve and enhance. The presence of this extant permission remains a material consideration of significant weight.

720. In addition, the Inspector's Report at the time of the examination of the site allocation in EMP3 stated *““The presumption is in favour of sustainable development which includes the need to conserve and enhance the natural environment and in particular conserving the landscape and scenic beauty of the AONB and the openness of the Green Belt and I am satisfied that those objectives would be achieved.”. Also “This leads me to the consideration of the impact of the site's redevelopment on the Kent Downs AONB and the Green Belt. I attach great weight to conserving the landscape and scenic beauty of the AONB and retaining the openness of the Green Belt but CS policy SP8 (and implicitly paragraph 89 of the NPPF) supports the retention, intensification and regeneration of a Major Developed Site such as this, subject to the retention of visual quality. The issue therefore becomes one of ensuring that the impact of any redevelopment would not be greater than already exists. This objective is encapsulated within policy EMP3 and can be further achieved through the development management process and more specifically through the requirements that will be set out in the proposed Development Brief for the site.”* (Officer's emphasis).

721. This therefore establishes that the Inspector was content with the principle of the redevelopment of the site for the purposes described in EMP3, and considered that these matters could be addressed through the Development Management Process.

722. Since those statements, the policy context has changed, and the proposal also needs to be considered in light of the more up to date guidance in the NPPF, particularly where local policies are inconsistent with this national guidance, which require the more efficient use of land.

The extent to which this proposal may comply with the special characteristics and qualities of the Kent Downs AONB.

723. The application site is not a farmed landscape, so this characteristic of the AONB is of very limited relevance to these considerations.

Landform and views:

724. The Sevenoaks District Countryside Assessment defines and describes the different types and character areas of the landscape in the Sevenoaks District, and evaluates each area in terms of the condition of the landscape and its sensitivity. The Assessment identifies this site as lying within the Knockholt Scarp. This is an area where it is identified as important to conserve the wooded cover and the scale of the steep grassland and cultivated fields. While it considers the ridgeline and scarp are not appropriate for development, it is relevant that large scale development already exists on the site, which led to the previous allocation for redevelopment as a Major Developed Site. The area of the proposed development is set within the confines of the existing woodland at the top of the hill and within the parameters of the existing built forms. Additional development is not proposed to the slopes at the southern side of the site or within close proximity to the southern, visually prominent woodland that forms the ridgeline. The landscape characteristics identified by the Countryside Assessment would therefore be preserved.

725. The applicant has submitted a Landscape Visual Impact Assessment (LVIA) as part of the Environmental Statement. This considers the impacts of the development (at both construction and operational stages) on various views across the area. This includes consideration of the impact on 16 views including those close to the site and also longer views from Knole Park in Sevenoaks, Ide Hill, Otford Mount and Fackenden Lane north of Otford. The removal of many of the existing chimneys and taller buildings on the site (in particular building N2 and S2 chimneys) would result in what is described as a minor improvement to wider views compared to the existing development, reducing the amount of visible built form on the escarpment ridge. There are also improvement to landscape views close to the application site, particularly from public rights of way and points of access to the site where the utilitarian perimeter security fencing and structures associated with the security of the site would be removed and more open views into the application site and its landscape would be provided.
726. A number of wireframe overlays have also been included in the LVIA showing that the height of the development would sit comfortably below the level of the tree line around the site with the exception of some taller elements of the proposed development, but these would not be prominent in middle to long distance views. The document identifies that in short range views to the north, around Otford Lane, some parts of the employment area or village centre may just break above the tree line, but would not be prominent in these views but would be consistent with baseline views of the existing buildings. In summary the majority of the built form would be contained within the perimeter vegetation that forms an effective screen to wider views.

Biodiversity, habitats, woodland and trees:

727. The site has, both historically and currently, been used for a variety of uses that would already have had an impact on these issues. Whilst the different activity any redevelopment would bring would have further impact on these issues, there would also be opportunities to have mitigation and management schemes for the woodland, landscape and ecology, including the management of access in the most sensitive areas which would be secured by conditions and the S106 legal agreement.
728. The existing trees on the site are protected by a blanket TPO and the details of which trees would need to be removed would be clarified when building positioned are shown at the reserved matters stage. The Council's Tree Officer acknowledges that the interior of the site has experienced 'estate planting' which to a degree has been formally planted and matured over the previous decades.
729. The applicant's arboricultural report identifies two trees on the site which are recognised by the Woodland Trust to display characteristics of veteran trees. These are T136 and T137 which are in the woodland on the eastern boundary behind the Canteen building and which sit just forward of the ancient woodland. The proposals provide the opportunity, through conditions and obligations, to ensure protection and maintenance of appropriate breathing

space around the veteran trees and ancient woodland, where no such management is currently in place.

730. KCC Ecology and the Council's Tree Officer are satisfied with the proposals subject to appropriate conditions and clauses within the S106 Agreement for long term management and protection where required.
731. There is an existing Tree Preservation Order that relates to Fort Halstead. Any new grant of full planning permission or reserved matters would only impact on that Order to the extent that it would be necessary to implement a planning permission. An outline permission does not impact on the TPO.

Historic and cultural heritage:

732. As stated above, the proposal would cause some harm to heritage significance, but would also bring considerable benefits through securing a sustainable use for the site. There would be less than substantial harm to the heritage significance of the site. There would be public benefits from putting the heritage assets to a viable alternative use. Adequate safeguards via conditions and the S106 Agreement could be used to secure the benefits for access to and the alternative use of the Ancient Monument, where access is currently excluded, and to protect and record the archaeology. The proposal would therefore be able to both conserve and enhance this characteristic of the AONB.

Geology and natural resources:

733. The site is currently developed and historic and current uses include processes that are unique to this site and could themselves have an impact on natural resources. The relocation of DSTL and the redevelopment of the site provides an opportunity to remediate the site and upgrade existing infrastructure to protect natural resources for the longer term, to the benefit of the wider community and the landscape.

Tranquillity and Remoteness:

734. The Kent Downs AONB Management Plan 2014-2019 includes a tranquillity map of Kent. Reviewing the location of the application site on this map, the site is in an area of medium to low tranquillity. This is not surprising noting the use of the site and its location close to main transport routes, including the M25.
735. CPRE have a nightlight map available to view online, and this indicates that Sevenoaks town, through Dunton Green, Chevening, and up to Fort Halstead, have similar levels of radiance shining up into the night sky.
736. The application and environmental statement includes a lighting assessment which considers the light spill of the existing development and that which could be experienced by the proposed. The existing site is well illuminated by lighting columns, floodlights and street light luminaires and sky glow is clearly visible above the site, and particularly at the existing access point at Star Hill Road. The proposals provide the opportunity to introduce control over the

lighting on the site. While some lighting would be necessary and inevitable, this can be secured to be designed to reduce light spill and be less obtrusive, to provide an improvement on the existing levels of sky glow and minor beneficial impacts at most viewpoints identified by the LVIA.

737. The submitted outline strategy for lighting is supported by KCC Ecology subject to conditions. Lighting for the site could now be controlled to better suit its context and respect the landscape character and enhance biodiversity and to better respect the important attributes of the AONB which have been identified within the AONB Management Plans.

Vibrant communities:

738. The proposals split the outline parts of the development into a number of distinct character areas, and each area has been given its own guidance on key characteristics with illustrative plans and sections in the Design and Access Statement. Mandatory design principles are included in this document and compliance with these principles would be secured by condition to ensure that the subsequent Reserved Matters applications adhere to these principles.
739. This offers a more robust approach than the extant 2015 permission and more certainty to the Council of the quality and impact of the development that would be delivered. They also demonstrate how the proposed residential densities for the site can be achieved while respecting the green infrastructure that is also proposed. More detailed information is also provided in respect of the areas around the village centre and the key heritage and cultural assets, to demonstrate how a successful and vibrant centre could be produced.
740. The Council's Urban Designer has raised concerns for the reduction in residential units from 750 to 635 as this is likely to impact upon the future vibrancy of the community and its social infrastructure. Concern has been raised in urban design terms to the reduction in density in the 'village mews' part of the development as this density is adjacent to the village centre where a higher density would be expected. The amendments have entailed the ability for car parking to be more prominent, which is unwelcome and could compromise the character of this area. It remains the case that this part of the development is proposed in outline only, and appropriate wording of the condition relating to the Mandatory Design Principles can ensure that this issue is addressed within any subsequent reserved matters application.
741. At pre application stage in January 2019, earlier iterations of the scheme for 750 homes were presented to Kent Design. The comments raised some concern for the development's sustainability credentials particularly in terms of the site's connectivity to other nearby settlements and public transport. Since the time of the Kent Design meeting in January 2019, the number of homes proposed has now been reduced, and the applicant has further developed the Mandatory Design Principles to ensure their focus around respecting the unique site characteristics in response to the first round of consultation responses received.

742. This proposal seeks to balance the need for housing and employment uses, creating a vibrant community whilst conserving and enhancing the AONB. The reduction in development is likely to impact on the vibrancy of the community, but by contrast, a reduced scale of development would provide more opportunity to conserve and enhance the AONB whilst making effective use of previously developed land.

Development pressures:

743. In considering the impact of the proposed development compared to the existing development on site, there are a number of factors to be considered.

744. The general character of the site is not one that is representative of the wider landscape and general character of development outside the site. The site has been and still is of a unique character that does not have the characteristics of existing village settlements in the Kent Downs AONB. Redevelopment of the site has the potential to conserve and enhance the unique character of the site itself, noting that it has been used in this unique way since before the designation of the AONB and that its own unusual character which is itself part of the qualities of the AONB.

745. Due to the nature of security on the site and the unique activities that take place, there are no public vehicular or pedestrian links freely available through the site.

746. The site has been developed since before the designation of the site within an AONB, on an ad hoc basis with buildings put up as and when needed. The design of the buildings is functional and utilitarian and with little regard on the whole to their appearance.

747. The scale of buildings on the site varies significantly with tall buildings and chimneys occupying some parts of the site. The tallest being building N2 close to the north eastern boundary, which rises to a height exceeding 16 metres. Other tall buildings are interspersed throughout the site, rising to heights of between 12 and 15 metres in the case of buildings S4, S5 and A10.

748. In terms of open spaces and planting within the site this is also on a quite random basis - some trees for instance being almost entirely surrounded at very close proximity by a single building, rather than sitting within a larger planned landscaped area. Such landscaped areas as there are within the site do not necessarily link up with each other nor with the external woodland and grassed areas.

749. Much of the existing site is hard landscaped in association with parking and access arrangements on the site. Functional lighting including flood lighting exists across the site in association with its existing function. As a result of the current use the site can make no addition to the provision of natural open space for use by users and local residents. The existing planting and wildlife is not managed on or around the site.

750. By contrast the proposed development would entail a planned environment in terms of its layout and design and the opportunity for access to and management of the site in a more considered way.

Access, enjoyment and understanding:

751. Unlike the previous 2015 application, the applicant now proposes detailed design parameters as set out in the Design Principals document, discussed above, which would secure a high quality built environment which better respects the wider landscape character and provide a Kentish vernacular.

752. The proposals would see the removal of some of the tall structures on the site, in particular buildings N2, X40 and X54 which are currently visible from beyond the surrounding vegetation and their replacement with buildings of a scale which is characteristic of the wider landscape character including those existing properties on Crow Drive to the north east of the site.

753. The densities and building heights across the site have been reduced as part of the amendments to the scheme in connection with the reduction to 635 homes from 750. This allows for a greater proportion of green open spaces across the site of varying character, linking areas of green infrastructure across the site. The proposals provide the opportunity to secure those formal and informal open spaces alongside a regime for their ongoing management, maintenance and protection. Ecological management plans and biodiversity enhancements would also be secured through any grant of planning permission, adhering to the aims of the PROW Act.

754. In addition, those open spaces and areas of green infrastructure would become accessible and available to residents of the development and the local area, increasing the public accessibility and enjoyment of the site and its unique ecological and heritage attributes.

Public Perception:

755. With regard to the public priorities identified by the 2021- 2026 AONB Management Plan, the proposals would protect the important views across this part of the AONB, as discussed above, and would improve them in some cases. The proposals give the opportunity for ongoing protection and management of ecology on the site.

756. The 2021- 2026 Management Plan identifies that improved sustainable transport within the AONB was among the priorities of the public to improve the enjoyment of the AONB. As discussed further below in this report, the proposals would involve improvements to the nearby public footpaths and bridleways and introduce bus services and cycling infrastructure into the site. This would therefore assist in achieving this aim.

757. The AONB Unit and Natural England object to the proposal, on three main grounds which are summarised below.

- An increased scale of development that is not in accordance with current local plan policy.

- Increase in scale of the development at the site, with higher density, which cannot be accommodated without significant landscape impacts on the AONB.
- Given these impacts, the proposal fails to conserve or enhance the natural beauty of the AONB, as required.

758. These are commented on in turn below.

759. When considering the policy context, para 2 of the NPPF states that, as set out in planning law, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. For those policies that are out of date, they should be given less weight, to the extent that they are out of date (in accordance with para 213 of the NPPF).

760. In objecting to the proposal concerns are raised about the proposals exceeding the dwelling numbers referred to in Sevenoaks policy EMP3, and concern that the development is less 'employment led' than previously. As explained above in the sections of this report relating to the 'policy context' and 'principle of development', it is incorrect that policy EMP3 is the sole policy for establishing the acceptability of the development on this site. The policies of the NPPF, particularly insofar as they are more up to date than the ADMP, are also responsible for assessing the acceptability of the proposals. A conflict with EMP3 in this way does not automatically result in the failure of the scheme to comply with other AONB policies.

761. The proposal would involve a higher quantum of development than the existing permission as set out in Policy EMP3. The quantum of the development proposed is referred to elsewhere in this report, but particularly in relation to the requirements of the NPPF to make effective use of land and the extent to which Policy EMP3 is inconsistent with the NPPF. The requirements of the NPPF need to be considered as a whole, in conjunction with the tests at para 172 of the NPPF, for major development in an AONB. A proposal that complied with Policy EMP3 as a whole, would be inconsistent with the requirements of the NPPF.

762. Both the AONB Unit and Natural England consider the proposal fails to conserve and enhance the AONB and would have significant landscape impacts. They raise concerns about some of the design attributes of the development and the absence of a formal design brief for the site from Sevenoaks Council. While there is no formal design brief, the application has been subject to discussion with the Council's Conservation and Urban Design Officers, and developed following input from Kent Design, and other consultees and appropriate design parameters have been established which go beyond what would usually be secured for an outline application.

763. While the AONB Unit and Natural England perceive the application to be premature in this regard, it is not considered that this provides justification to reasonably delay or withhold planning permission. Para 49 of the NPPF states that arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances which do not apply in this case as they relate to emerging local plans. Further tools

exist to ensure that the development is high quality at the time of the Reserved Matters submissions. The submissions by the AONB Unit and Natural England fail to address the existing conditions and characteristics of the site and the benefits the proposals entail for the sustainable re-use of the site and its ability to contribute positively to the landscape character, cultural heritage, public access and woodland, ecology and biodiversity enhancements.

Initial AONB conclusion

764. Officers are satisfied that, for this outline stage, there is sufficient information and there would be appropriate safeguards, to deliver a development which is landscape led and respectful of its verdant backdrop, wildlife and biodiversity and unique heritage. This is reflected in both the submitted documents and the obligations which would be secured by a S106, including the effective long term management of woodland, ecology and open spaces and heritage assets across the site, in line with the recommendations of Kent Design.
765. Viewed as a comparison to the existing development, the existing permission which has been secured and implemented and taking into account the proposals to manage the landscape in the future, install appropriately scaled and designed built forms to the site, allow public access to the site, appropriately manage woodland and ecology and to protect the local economy the proposal would conserve and enhance the AONB and would thus be compliant with that aspect of policy EMP3, the requirements of Policies SP1 and L08 of the Core Strategy and Policies EN4 and EN5 of the ADMP. The positive attributes of the development also adhere to the aims of the Kent Downs AONB Management Plan 2014- 2019 and the 2021-2016 Plan and protect the special characteristics and qualities of the AONB.
766. The requirements of para 172 of the NPPF are discussed later in the report as they are informed by other considerations which are discussed in turn.
767. In light of the current character of the site, and its contribution to the AONB, and the considerations discussed above, it can be concluded that the proposals would both conserve and enhance the special landscape character of the AONB and its distinctive character and natural beauty while including development, compliant with the requirements of the CROW Act 2000.

Transport and Highways Implications

768. The NPPF states within paragraph 109 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.”
769. Para 108 sets out criteria for assessing sites, including specific allocations for development. Para 108(c) states that decisions should ensure that: “Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be effectively mitigated to an acceptable degree.”

770. Policy EMP3 (the ADMP site allocation for Fort Halstead), contains criteria relating to the sustainability of the redevelopment proposals and its highways implications. This includes, in summary:

- that the proposals be sustainable in respect of location, uses and quantum of development, and be accompanied by a Travel Plan incorporating measures to reduce dependency of future occupants on car use;
- that the proposals provide accessibility to jobs, shops and services by public transport, cycling or walking;
- that the development should confirm through a Transport Assessment that the development would not have an adverse impact on the local and strategic road networks.

771. These parts of EMP3 are considered to be compliant with the aims of the NPPF.

772. There are a number of issues relating to the highways implications of this development which are discussed in turn below and informed by comments from the Highways Authority at Kent County Council and Highways England.

Site Access

773. The 2015 outline permission included a condition which restricted the use of the Star Hill access to the development to be used only by buses, emergency vehicles, cyclists, pedestrians and horses. This condition was imposed at the request of the Development Control Committee following discussions concerning the impact of the development. The Transport Assessment for the application did not cover the use of the Star Hill access for this limited purpose.

774. The current application seeks to utilise the two main accesses to the site, being the access to the A224 via Crow Drive to the north eastern side of the site, and the access to Star Hill Road to the west.

775. These are both existing accesses to the site, although the main access utilised by the current occupiers is that onto Crow Drive, where the main reception areas and parking areas are located. It is evident that those existing accesses are currently primarily used in AM and PM peaks only. When DSTL vacate the site in 2022 the existing barriers to the site are expected to be removed and there is the potential for access to become unrestricted through the site, and this position is a material consideration. Outside of the 2015 permission, there are no existing planning restrictions that require the Star Hill access to be gated.

776. The proposals intend to utilise both accesses to the site, but with Crow Drive and the A224 serving as the primary access to the site, and Star Hill Road being a secondary access.

777. The Highways Authority have confirmed that for a development of this scale, two access points are required. The Highways Authority have stated that they would recommend refusal if only one access were proposed for the site as

this has safety implications and provides highway resilience if an incident were to take place on the main access.

778. The application addresses the previous concerns of Members through incorporating measures to promote Crow Drive/ the A224 as the main access to the site, and to promote Star Hill Road only as a secondary access to the site through deterring its use. These measures include the following:

- positioning of the commercial uses and potential school site to the eastern side of the development close to the A224 access;
- the design of the highway through the site has been specifically designed to be more convoluted than the A224 access, incorporating features such as a 20mph speed limit, raised table tops, mini roundabouts eyots (all included as mandatory design features) in order to slow traffic and make this a less convenient route for users;
- part of Crow Drive (the spine road through the site) would be pedestrianised, removing a direct through route to the Star Hill Road access;
- sign posting to the development to be only from the A224.

779. As a result of these measures, the Transport Assessment assumes, in agreement with the Highways Authority, that the greater use of the new roundabout at Polhill rather than the T-junction at Star Hill Road, as a roundabout is typically faster to join.

780. A suite of improvements are recommended to the Star Hill Road access, which were not previously included in the 2015 permission. These are supported by the Highways Authority and the applicant proposes the following:

- Provision of improved visibility splays of 2.4m set back by 103m to the north and 95m to the south (previously 90m in the 2015 permission)
- New warning signs on the northern and southern approaches to the junction;
- The addition of anti-skid surfacing on Star Hill Road to assist vehicle stopping performance;
- Tapers on the junction corner radii to help large vehicles to turn without overrunning the centre of the major carriageway;
- An enlarged splitter island to separate inbound and outbound movements by large vehicles to remove the potential for conflicts;
- Best endeavours to reduce the speed limit on Star Hill Road to 40mph ('Best Endeavours' is considered reasonable here as the 40mph speed limit could only be achieved through a Traffic Regulation Order "TRO" which is subject to independent consultation);
- Safety enhancements on Star Hill Road on the bend to the south east of the access.

781. The Highways Authority have also recommended that these works include white lining or hatching improvements at the cottages on Star Hill Road to the south of the access.

782. In terms of the detailed access plans which the applicant has submitted, the Highways Authority have confirmed the details of the Polhill Road roundabout are acceptable. The Highways Authority have raised queries regarding the visibility splays shown on the detailed drawing of the Star Hill Road access. The applicant has confirmed that the junction design has been subject to a Stage 1 Road Safety Audit. The visibility splays shown are improved beyond the 2015 planning permission (which were 2.4 x 90m) and are now proposed at 2.4 x 103m to the north and 2.4 x 96m to the south with no obstructions above 1.05m, improving visibility and safety at the junction. These have been accepted by the Highways Authority and take account of the protected trees surrounding the junction.
783. The above works, with the exception of the visibility splays, would be secured through a Section 278 Agreement, under the Highways Act 1980. This is an agreement with the Highways Authority to carry out the works on the public highway. The Section 106 agreement would require that the developer enter into such a S278 agreement.
784. Subject to the above measures and mitigations being secured by conditions and the Section 106 agreement, the proposed use of the Star Hill Road access in addition to the Crow Drive/ A224 access, is considered acceptable and would preserve highway safety, compliant with the aims of the NPPF and EMP3.

Trip Generation and Distribution

785. Detailed comments on the Transport Statement have been provided by the Highways Authority above.
786. The studies of highways conditions were undertaken prior to the Covid pandemic in 2018.
787. Most notably the applicant's Transport Statement uses the scenario that could arise from the lawful position demonstrated by the Certificate of Lawful Development of March 2004 (03/02897/LDCEX). Under this scenario the whole site could lawfully be used for B1 purposes with ancillary B8 uses, unrestricted by planning conditions and with unrestricted use of both existing accesses to the site. As the lawful use is a material consideration for the determination of the planning application, it is accepted methodology that this forms the basis of comparison for the current proposals in terms of their transport impacts. This assessment was undertaken prior to the changes to the Use Classes Order in September 2020 and B1 uses now fall within the new Class E, which includes a much wider variety of uses.
788. The applicant has provided information on the differences in traffic between the scenario of the Lawful Development Certificate and the current proposals, using a worst case scenario of there being no school, which has been accepted by the Highways Authority. Generally this data suggests that at key links and junction there would be a reduction in vehicle trips from the proposal at morning peaks and a small increase in trips in the afternoon peak.

789. The Lawful Development Certificate scenario would generate a greater number of trips at the Star Hill Road access, this is due to the removal of the secure gated access when DSTL vacate the site in 2022 and the current absence of traffic calming measures on this route.
790. The table below shows the net difference in peak trips between the scenario created by the lawful development certificate and the proposed development at Star Hill.

	Lawful Development Certificate Scenario	Proposed Development	Net Difference
AM Peak	306	135	-171
PM Peak	236	252	16

791. The proposed data for the impact of the proposed development on the Star Hill Road access takes into account the measures described above designed to deter the use of this access.
792. Arising from the above assessments, the applicant has prepared highway impacts assessments, which account for a period to 2035 in line with the previously emerging Sevenoaks Local Plan period. The West Kent Cold Store and the extant 2015 permission for Fort Halstead have been included in the net development flows. The potential cumulative impacts with the development at Broke Hill Golf Course, for example, have not been included at this stage as that development does not benefit from planning permission.
793. Most notably the Highways Authority have commented that the highway south of the access on Star Hill Road would see the greatest percentage increase in traffic as a result of the development, being a 15.3% in the morning peak and 14.1% in the afternoon peak. However the Highways Authority note that due to the low baseline traffic flow here, the increase of 2- 3 vehicle movements per minute would not cause an adverse impact to capacity. It can also be concluded that the impact, in terms of the NPPF test, is not therefore severe.

Public Transport

794. The proposals intend to divert Service 3 (formerly 431) into the site and provide a Demand Responsive Transport service. There is an on demand bus service currently operating locally with an existing company, which covers the wider area around the site, Sevenoaks and its environs.
795. The highway layout adjacent to the Star Hill Road access has been designed to accommodate a bus turning loop. Go-Coach currently operate services S31, S33 and T3 along Star Hill Road. The applicant has contacted the operator who has confirmed that they are satisfied with the specification of the turning loop, which would allow these services to stop here. The provision of the turning loop should occur prior to first occupation of the development, alongside the other works on Crow Drive and Star Hill Road.

796. The Demand Responsive Service is proposed to consist of two minibuses operating Monday to Friday linking the site to local stations for commuters and providing a demand responsive flexible service during off peak periods. Full details could be secured by condition for approval at a later stage.
797. The applicant describes that the Demand Responsive Transport service would also provide links to local primary school and the Highways Authority have expressed concern regarding the logistics and likely uptake of this part of the service and the ability of the bus service to turn around at Knockholt Station. Additional clarifications were provided by the applicant in response to those concerns. In summary the Demand Transport Unit would operate for commuters until 8am, and then provide a school service with provisions to make the service safe for children. A walking bus has also been discussed. The Highways Authority have raised no objections, requesting that the provisions are secured by the S106 with the first Demand Responsive Transport to be introduced at the first occupation of the development with a second bus introduced in year 3. The S106 would ensure this service is secured.
798. In response to concerns regarding delicate turning arrangements at Knockholt Station, the applicant has suggested utilising a route utilising Wheatsheaf Hill and the A21 in a clockwise direction to avoid the need for turning at the station. The Highways Authority accept that this would only add 2 minutes to the journey and would enable the use of the bus stop to the east of the station approach.
799. The likely level of use and specific requirements for this bespoke transport are likely to rely on the phasing of the development and rate of occupation.
800. The Highways Authority have recommend that a condition be imposed to secure details of the bus services for the development and how the demand will be monitored and responded to.
801. Overall the proposals make appropriate provisions to improve the sustainability of the site and its links to public transport. This is welcome and compliant with policy EMP3 and the NPPF insofar as it seeks to ensure improved public transport.

Pedestrian and Cycle Network

802. The earlier 2015 permission secured cycling infrastructure within the site, and improvements to nearby public footpaths to ensure they can be used by both pedestrians and cyclists. This included works to the bridleway between Polhill and Twitton including lighting in the underpass, and a new bridleway to Knockholt Village.
803. The proposed development would incorporate relevant cycling infrastructure within the site itself and the majority of this detailing would be secured through the reserved matters process at a later stage. The applicant has shown commitment to securing a cycle hire scheme for the site in association with a sustainable transport initiatives provider, and contributing towards increased cycle parking facilities at Knockholt Station. However, despite the

applicant proposing to assist in providing more cycle parking at Knockholt Station, Network Rail have confirmed with Southeastern Railways that improvements to cycle parking facilities have already been undertaken, and they have not asked for anymore. Network Rail have instead suggested that cycle routes to the station should be improved.

804. In order to provide a safer cycle route to Knockholt Station, improvements to the advisory cycle lane on Old London Road are proposed in the form of a Traffic Regulation Order to prevent cars parking and blocking the cycle lane. This is supported by the Highways Authority. This could be achieved by asking for ‘best endeavours’ as the creation of the Traffic Regulation Order relies on a third part application and a separate process of public consultation.
805. The applicant has undertaken a feasibility study regarding the possibility of providing a new off road cycle route between Polhill and Knockholt Station as the existing cycle way is constrained. The applicant has agreed to provide an advisory cycle lane on the A224 to link Otford Lane and the existing advisory cycle lane which exists closer to Knockholt Station. This entails additional signage to the carriageway, in particular to the approach to Shacklands roundabout and London Road between the site and Knockholt Station, rather than a segregated cycle lane. This approach is informed by cyclists accidents on this stretch of road.
806. In terms of pedestrian movements, public right of way SR172 exists across the northern boundary of the site and could be brought into the site to provide pedestrian connectivity to Knockholt Pound. An improved pedestrian and cycle route linking Knockholt Pound via Birchwood Lane has been agreed with the applicant alongside the alignment of SR172. This is welcome and provides enhancements to the connectivity of the site with Knockholt Pound and the surrounding area.
807. The improvements to the bridleway between Polhill and Twitton, and the upgrade of the path SR172 to Knockholt Pound also continue to be proposed, as per the earlier permission.

Travel Plan

808. A final travel plan for the site would be secured by the S106 for both the new houses and employment uses. This is required in line with the requirements of policy EMP3 and to reduce the dependency of future users of the site on the private car. The Highways Authority have commented that this must include objectives and modal split targets, a programme of implementation and provision for monitoring, review and improvement. It should include: realistic alternatives to the private car, including the demand responsive transport service and diversion of bus route 3 into the site; parking management strategy; cycle parking; appointment of a Travel Plan Coordinator and monitoring fees. Consideration of car clubs and electric bike hire should be included.

Impact on the Strategic Road Network

809. The applicant's Transport Assessment includes an assessment of the junction of the M25, A21 and A25 particularly during peak hours. The proposals have been subject to review by Highways England who act as strategic highway company and are the highway authority, traffic authority and street authority for the strategic road network. In this instance they are particularly concerned with the impact of the proposals on the efficient operation of junction 4 of the M25. Having regard for the extant 2015 permission and the Certificate of Lawful Development for the site, Highways England are content that the current proposals would not have any additional severe impacts on the M25 network. The proposals meet the requirements of EMP3 in this regard, which requires that the development does not have an unacceptable adverse impact on the strategic road network, and comply with the NPPF.

Wider Highways Impacts

810. In terms of impact on Otford, the Transport Assessment suggests that anticipated trips through Otford arising from the additional 185 units on the site would see the addition of 14 two way trips in the morning, and 13 two way trips in the afternoon peaks. This equates to approximately 1 vehicle every 4 minutes during peak hours. This is accepted by the Highways Authority and is not considered to represent a severe impact under the NPPF test. Neither is it considered necessary for mitigation measures be secured for this impact.

Construction Impacts

811. It is acknowledged that the construction process would impact on the local road network. At the request of the Highways Authority a Construction Management Plan is recommended to be secured by condition relating to each phase of demolition and construction. This should include details including routing of vehicles to the site, employee parking, delivery vehicle unloading and turning, wheel washing and any requirements for traffic management.

812. The Highways Authority have also requested that the Star Hill Road access should not be used in connection with the construction process. This can also be secured by condition.

Public Right of Way Network

813. Policy EMP3 requires that the development on the site makes provision for improvement of the Public Right of Way network. The site adjoins a number of Public Rights of Way, in particular numbers SR172, SR97, SR722 and SR11.

814. Under the S106 accompanying the earlier 2015 permission, improvements were secured to two of the adjoining public rights of way. These were: the links to SR172 and links to Knockholt Pound, and improvements to the bridleway to Twitton, including the provision of lighting to the underpass where the bridleway crosses beneath the M25. In addition, that permission, similarly to the current application, entailed the opening up of the site and improvement of pedestrian connections generally.

815. The Public Right of Way Officer at Kent County Council has raised concerns for the proposed improvements to footpath SR172, which is proposed to be amended to provide improved pedestrian and cycle route from the site towards Knockholt Pound to the west of the site. Concerns have been raised for clashes between cycles and pedestrians, and potential liability. They suggest that instead the path could be upgraded to a Public Bridleway to allow it to be used by cyclists and equestrians. The S106 for the earlier 2015 permission secured the improvements to that path so that it may be suitable for pedestrians, cyclists and horses, and the S106 required that those details were approved with KCC. It is therefore considered that this could also be achieved with the current permission through the S106, to ensure the route is designed to their satisfaction. Amendments and diversions to the Public Right of Way would also require separate consent from Kent County Council.
816. Overall the improvement of routes connecting the site to Knockholt Pound are considered to be a benefit to the development. Beyond this point cyclists would need to use Old London Road. While it would be preferable that cyclists would not have to share the carriageway with vehicles, this is considered acceptable overall.
817. Concerns have been raised by the Public Rights of Way team for obstructions on SR97, which runs around the eastern side of the site through the woodland. Issues relating to future management of the woodland would be secured through the relevant management plan, and this could reasonably include a commitment to ensure the footpath is maintained to a good standard. This would be of benefit to the public right of way.
818. It is understood that alterations to path SR11 are no longer proposed, but instead improvements to the cycling environment on the highway to Knockholt Station are proposed and would be secured.
819. The Public Right of Way Officer has commented that the proposals would increase pressure on the local network of paths as a result of increased footfall and the use of these paths are sustainable transport links. It is noted however that the extant 2015 permission did not secure any financial contributions for works to the paths outside the site boundaries. In light of the 2015 permission and the improvements that would be secured by this permission, it is not considered that the additional 185 homes proposed in this instance would sufficiently justify the contribution suggested by the Public Right of Way Officer or that the contribution would be compliant with Regulation 122 of the CIL regulations regarding planning obligations.
820. In their most recent consultation response the Public Right of Way Officer has raised concern for the layout of the Star Hill Road access, stating that it fails to include a safe crossing for the public footpath SR172. In response the applicant has stated that the public footpath is intended to cross Crow Drive away from the point of access so need not be included in the detailed access plan.
821. Overall, the opening up of the site and reinstatement of public movements across the site and wider area, is welcome and would constitute a benefit of the proposed scheme.

Waste Collection

822. Sevenoaks Council Direct Services team have raised concerns for the ability of the internal access roads to accommodate HGV waste vehicles. As these elements are only submitted in outline at this stage, this matter would be addressed at the reserved matters stage when the details of the site layout and appearance are submitted.

Conclusion on transport and highway implications.

823. The impact on highway safety would not be severe as a result of this proposal and any significant impacts could be mitigated to an acceptable degree. The proposal would therefore comply with local and national policy.

Protected Trees, Woodland and Landscaping

824. Paragraph 170 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment. This includes criteria by which this can be achieved, including protecting an enhancing valued landscapes, sites of biodiversity or geological value and soils, and recognising the intrinsic character and beauty of the countryside, among other points.
825. AONB impacts, and the NPPF tests at paragraph 172 are discussed above and concluded within the planning balance section of the report below.
826. Paragraphs 174 to 177 of the NPPF relate to habitats and biodiversity. Para 175c) relates to ancient trees and woodland and states that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensatory strategy exists.
827. The main part of the site is surrounded by woodland of which most are designated as Ancient and Semi-Natural. As such these areas of woodland are likely to have been in existence for at least 400 years. A gap in this ring of designated Ancient Woodland exists only to the southern side of the site, and around Crow Drive at the north eastern side of the site. In addition the site in its entirety is subject to a blanket Tree Preservation Order (Order 4 of 2016).
828. As part of the amendments to the application in July 2020, a new Arboricultural Impact Assessment was prepared, in response to concerns previously raised by the Council's Tree Officer and The Woodland Trust. As much of the wider scheme is submitted in outline form only, it is difficult to establish the exact trees which would need to be lost to facilitate the development, although the Council's Tree Officer considers it likely to be in the region of 154. The likely number of trees to be removed has been reduced substantially following the amendments to the densities, which would allow more trees to be retained. These individual losses would be clarified and assessed at the time of the reserved matters and conditions applications, and as protected trees the assessment of whether not they should be removed will be assessed by a Tree Officer at that time and

informed by a site inspection. It is relevant however that the Tree Officer acknowledges that the interior of the site has experienced 'estate planting' which to a degree has been formally planted and matured over the previous decades. The principle of reserving consideration of tree retention on the site has been established by the earlier permission.

829. The area of the detailed application, within the centre of the site, also contains six trees which would be affected by the development in this area. Of these, a high quality oak tree would be retained as part of the village centre landscaping, but the other five, of a lesser quality, are proposed to be removed. No objection is raised to this by the Tree Officer, and it is noted that the removals are required to facilitate the creation of a functioning village centre.
830. With regard to the designated Ancient Woodland which surrounds the site, the proposals include a buffer of 15 metres between the edge of the woodland and the new development, compliant with Natural England standing advice. This is demonstrated on the Land Use and Green Infrastructure parameter plan. Objection has been received from Kent Wildlife Trust that the 15m buffer is insufficient. However, Government guidance produced by the Forestry Commission and Natural England advises that a buffer of a minimum of 15m should be provided between development and ancient woodland. It states that a greater buffer may be necessary if the impacts would be likely to extend greater than this distance, for example in the case of air pollution from increased traffic. However in this case, given the locations of the buffer on the edges of the development, it is not considered that the greater buffer is necessary. A 15 metre buffer was secured as part of the 2015 permission.
831. The Council's Tree Officer had previously raised concerns for the future management of this land and the potential long terms impacts of the development arising from an increase in pedestrian footfall within the woodland, which could cause harm to the ground conditions and associated flora. A scheme for the future management of the woodland has therefore been requested, which would suggest designated routes through the woodland, away from sensitive areas. The management plan should also demonstrate how flora and fauna within the woodland would be managed.
832. The demolition and construction processes associated with the development could impact upon the protected trees and woodland. For this reason a condition is recommended to ensure adequate protection is place for both retained trees and the ancient woodland buffer.

Biodiversity

833. At a local level policy SP11 of the Core Strategy seeks to ensure that the biodiversity of the district will be conserved and opportunities sought for enhancement to ensure no net loss of biodiversity. The NPPF (para 170) also states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity value. Para 170d) states that decisions should minimise impacts on and provide net gains for biodiversity.

834. Policy EMP3 (the site allocation for Fort Halstead) also requires that the development includes the protection, enhancement and management of biodiversity, compliant with the aims of the NPPF.
835. As part of the revisions to the scheme made in July 2020 the applicant submitted additional information in response to concerns raised by the KCC Ecology Team. The applicant has included proposed mitigation measures within an updated “Framework Ecological Mitigation Strategy” (FEMS) and “Landscape and Ecological Management Plan” (LEMP).
836. KCC Ecology have advised that each reserved matters application and also the detailed part of the application should demonstrate compliance with the Outline Framework Ecological Mitigation Strategy. They advise that the first reserved matters application should include a revised Outline FEMS and that this should be submitted as a detailed site-wide mitigation strategy in order to include more detail than is currently within the Outline FEMS. It has been suggested that this site-wide mitigation strategy can then be updated with each subsequent Reserved Matters application. These would address the matters discussed in turn below.

Roosting Bats

837. Thirteen buildings have been identified as having bat roosting potential and the Ecology Team advise that further surveys will need to be undertaken prior to the commencement of any associated works to those buildings in order to understand the impact on bats at that time. Buildings found to be utilised by bats at that time will also require mitigation measures implemented under a Natural England license. This is particularly relevant for the buildings associated with the detailed parts of the application, and mitigation measures for bats should be incorporated into the mitigation measures for that phase, as discussed below.
838. A European protected species mitigation (EPSM) Licence will be required to carry out the development. The Conservation of Habitats and Species Regulations 2018 requires Sevenoaks District Council to have regard to the requirements of the Habitats Directive in the exercise of their functions and we must therefore consider whether it is likely that an EPSM Licence would be granted by considering the three tests when deciding whether to grant planning permission. These tests are considered as follows:
839. Test 1: Regulation 53(2)(e) states: a licence can be granted for the purposes of “preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment”.

Response: The planning application as a whole entails notable public benefits as described in this report and summarised at the end of this report, including those to the natural environment.

Test 2: Regulation 53(9)(a) states: the appropriate authority shall not grant a licence unless they are satisfied “that there is no satisfactory alternative”.

Response: The alternative to the proposed development, being no development, is not a satisfactory alternative. The extant planning permission is also a material consideration.

Test 3: Regulation 53(9)(b) states: the appropriate authority shall not grant a licence unless they are satisfied “that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.”

Response: The Ecology Team at KCC have assisted in the assessment of this test and have stated in their comments that, subject to the proposals being strictly implemented as required, the favourable conservation status of bats can be maintained.

840. In summary it is therefore likely that the license would be granted.

Badgers

841. The surveys undertaken by the applicant have identified one main sett, one annex set, three subsidiary setts and six outlier setts on the site, demonstrating the site’s high value for badgers. The submitted information also includes sett monitoring which was updated in 2020. As a protected species, mitigation for them must also be included in the development, and consideration be given to their foraging and commuting once operational. These details should be included within the final mitigation strategies which would be secured by condition. It is noted by the Ecology Team that the vegetation around the boundary of the site, and the 15m woodland buffer, will assist in providing continued habitat connectivity around the site.

Dormice

842. The vast majority of suitable dormouse habitat on the site would be retained and enhanced as part of the proposals as it is primarily within the wooded areas. Some areas of vegetation will be subject to reduction/ removal so mitigation measures should be secured through the mitigation conditions. The applicant has already specified what these measures may include.

843. Similarly a European Protected Species Mitigation (EPSM) Licence will be required for the development due to the impact on dormice. The three tests detailed above would therefore again be relevant to the assessment of the planning application.

844. The responses in respect of tests 1 and 2 above are the same. With regard to test 3, the KCC Ecology Team are satisfied that the measures currently detailed in the mitigation strategy are appropriate to maintain the favourable conservation status of the dormice on-site and can be secured by condition. This part of the test is therefore met and it is considered likely that the license would be granted.

Invasive Species

845. Rhododendron and Cotoneaster have been identified on the site and these have the potential to be spread during construction works and could contribute to a lowering of biodiversity if they colonise new areas. The applicant has submitted details of measures that would be implemented through the outline LEMP and detailed LEMPs for subsequent phases and this should be secured through the relevant condition.

Invertebrates

846. The site contains significant habitat for invertebrates which is proposed to be retained as part of the development and further opportunities exist to enhance these habitats elsewhere on the site. Further mitigation is not required, but specific habitat enhancement proposals can be included in the LEMP.

Amphibians

847. It has been identified as unlikely that amphibians would be encountered during the development due to the distance to the nearest notable waterbodies. Mitigation measures are therefore not required for amphibians.

Habitats

848. Botanical surveys have been undertaken and reviewed by the KCC Ecology Team. In summary, since the surveys of the last application, overall the site continues to support unimproved and semi-improved calcareous grassland, and ancient broad-leaved semi-natural woodland considered of district value. No protected plant species were observed.
849. Under the NERC Act 2006 the Local Planning Authority has a duty to maintain and enhance biodiversity. While some grassland would be lost by the proposals, the FEMS states that the unimproved calcareous grassland would not be impacted, as shown in the parameter plans. In other parts of the site the grassland would be enhanced with ongoing maintenance of retained and created habitats. This would be secured through an LEMP.

Management and Enhancements

850. The applicant has submitted information to show that ongoing management and enhancement of both retained and created habitats would be implemented through an LEMP. The submitted outline LEMP includes suitable enhancement proposals, management prescriptions and associated monitoring. KCC Ecology have added that the LEMP should also include that all deadwood or reduced or felled trees should also be retained on the site as deadwood habitat and control of weeds should not be via herbicide application.
851. Conditions are therefore recommended to ensure that with each Reserved Matters application, a detailed Landscape and Ecology Management Plan (LEMP) should be provided, which in turn should be in accordance with the one now provided.

Lighting

852. Sensitive external lighting would be required on the site to ensure that it does not cause detriment to diversity including commuting and foraging bats and badgers. Indicative details of a lighting strategy have been submitted showing potential positions of lights and light spill in lux levels. KCC Ecology are satisfied with the outline plan and external lighting details should be secured by condition.

Residential Amenity

853. It is relevant that the lawful use of the site is for predominantly B1 and B8 purposes which are unrestricted by planning conditions, for example relating to hours of operation or noise levels. The change of use of the site under this application has the ability to improve the amenity of those properties close to the application site through reducing unrestricted B1 and B8 use class uses close to those existing properties.
854. The impact on individual neighbouring properties, in terms of privacy, natural light and visual intrusion, would be assessed in full at the time of the reserved matters applications when the exact locations of the new built forms would be presented. The detailed part of the current application, for which we know the locations and sizes of the built forms, is located centrally on the site and would have a minimal impact on any existing dwellings neighbouring the site.
855. The proposals entail the retention of QinetiQ on the site who intend to continue to operate some explosive operations. These would be contained to the southern part of the site within the X-enclave and behind security fencing. The needs of QinetiQ, and their ability to operate safely from the site have informed the development proposals. Concerns have been raised through public consultation for the relationship of QinetiQ activities with the new village centre and residential properties. Environmental Health have reviewed the submitted documentation including acoustic assessment which describes the operations to be irregular, of limited duration and during the day. On this basis the Environmental Health Officer has accepted the methodology and findings of the noise assessment. No objection has been raised nor conditions recommended to ensure a satisfactory relationship. It is relevant that separate legislation exists, for example, under Environmental Health regulations, that would allow separate investigation and enforcement if significant noise or disturbance were to occur.
856. Issues relating to the quality of the proposed accommodation and the amenities of future residents would also be considered further at Reserved Matters stage. The site is considered capable of delivering a good standard of accommodation for its future residents.
857. Disturbance may occur to a degree during the construction process, however this would be for a limited period. A condition is recommended to secure a Construction Environmental Management Plan for each phase which would include measures to preserve both highway safety and residential amenity, in order to comply with policies EN2 and EN7 of the ADMP.

Air Quality

858. It is accepted that the development would have a negligible impact on local air quality and that the effect of the development would not be significant and that no further mitigation measures are required in order to make the site suitable for the proposed uses. As Environmental Health agree with these conclusions in the application documents, it is not considered reasonable that further mitigation be secured in this instance. The Environmental Health Officer has questioned whether the development would include electrical vehicle charging points, these would be secured by condition and details submitted at a later stage.

Contamination

859. The NPPF at paragraph 178 requires that planning decisions ensure that a site is suitable for its proposed use taking into account ground conditions and any risks arising from land instability and contamination, this includes risks from former activities. The requirements of the NPPF include that after remediation, as a minimum, land should not be capable of being determined as contaminated under Part IIA of the Environmental Protection Act 1990.

860. Given the previous uses of this site, there is a risk of land contamination. It is understood that remediation works are being carried out by the current occupiers in connection with their transfer of the land, as described in the earlier 2015 application. Recommendations for further site investigations and remediation are described within Volume III 13.1 and 13.2 of the Environmental Statement submitted by the applicant. The application has been subject to review by the Council's Environmental Health team and the Environment Agency in respect of land contamination.

861. The Environment Agency have recommended a suite of conditions to be imposed to secure further site investigations and remediation strategies as appropriate for the development as it comes forward, in order to ensure that the site is safe for future occupiers. In line with the recommendations of the Environment Agency, it is considered entirely reasonable that this further information be secured by condition.

862. It is acknowledged that the previous use of the site presents a medium to high risk of residual contamination that could be mobilised during the construction works to pollute controlled waters. The Environment Agency have commented that controlled waters are sensitive in this location as the site is located upon a principal aquifer.

863. The Environment Agency are satisfied that the application documents satisfactorily demonstrate it would be possible to suitably manage the risk posed to controlled waters however further information will be required prior to the development being undertaken.

864. Subject to the imposition of conditions, as recommended by the Environment Agency, the proposals would be compliant with paragraphs 178 and 179 of the NPPF.

Flooding and Drainage

865. Environment Agency maps show that the entire site is at very low risk of flooding from the sea or rivers, or from reservoirs.
866. Environment Agency maps show that the site has various small pockets of land which are subject to low, medium and high risk of surface water flooding. The A224 to the north of the site, however, does have a history of flooding which is understood to be a result of blocked drainage ditches.
867. The applicant has submitted a Flood Risk Assessment and Drainage Strategy, which is consistent with that approved under the 2015 permission.
868. Kent County Council, as the Lead Local Flood Authority (“the LLFA”) and the Environment Agency have both been consulted on the proposals. The LLFA raise no objections to the proposed deep-bore soakaways as the infiltration testing previously undertaken shows that it is feasible. Further testing is required at a later stage in the location of the deep bore soakaways. The comments from the LLFA make recommendations as to how this should be done.
869. In light of the intended phasing and timescales for the development, the LLFA has requested that a drainage strategy be submitted for each phase, to be compliant with the site wide strategic drainage strategy, so that it can be confirmed that each catchment operated appropriately.
870. The Environment Agency have also requested conditions regarding infiltration drainage methods in order to ensure that the development would not be at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Sustainability

871. A Sustainability and Energy Strategy have been submitted with the application, this includes an initial appraisal to establish the potential for low or zero carbon technologies for the development, and this is intended to inform the future development of the scheme. A decentralised energy network is not proposed for the development. The Strategy shows that air source heat pump systems and solar PVs will be considered, and details would form part of any reserved matters application. However the developer will need to be mindful of the landscape and heritage constraints affecting the site in designing these elements.

Infrastructure

872. As discussed above, the proposals include land for provision of a 1FE primary school. The applicant does not propose to build the school, but to safeguard the land in case it should be required by KCC in response to the uplift in the population. The S106 agreement would ensure that if the land were not used by KCC by a specified period of time then the land would revert for employment use. KCC have not specifically commented on this application, but

their involvement would be required into the wording of the legal agreement to ensure it is fit for this purpose.

873. The proposals also include potential for occupation by a doctors surgery, as described above the S106, similarly to the 2015 permission, would ensure that first refusal for this floorspace be given to the CCG or health care providers under reasonable terms. Provisions would also be put in place through the agreement to secure the community floorspace and ensure it is completed to a required specification to make it fit for purpose. This was the case under the 2015 agreement.
874. The provision of these facilities on site would help to mitigate the impact of the development, and in the case of the school the cumulative impacts with other potential development plan allocations, on the local area.

Water

875. Concern has been raised for water infrastructure on the site, which is understood to be shared by the site with existing properties in Fort Road, Armstrong Close, Beckman Close and parts of Crow Drive.
876. Thames Water have acknowledged in their consultation response that the existing water network infrastructure would be unable to accommodate the development and have suggested a condition be imposed to ensure that details are submitted to ensure that an adequate water supply is given to the site.
877. Based on information provided by the applicant, it is understood that, at present DSTL have the status of a private water company and once they vacate the site the land reverts to Merseyside Pension Fund as the site owners, and it is understood that they will need to take over the supply to the local residents. Investigations are underway to explore a supply of public water to the site at the expense of the development and this is incorporated within the viability assessment discussed above in the context of affordable housing. The applicant wishes to retain QinetiQ on the site, as well as provide a water supply to the local residents, for the duration of the works and the provision of a public water supply from Thames Water would be the preferred option. If a public supply is provided on the site and to the other property boundaries this would give the opportunities for connections to those local properties, subject to agreements with all landowners, including the management companies involved. It is recommended that the condition recommended by Thames Water be imposed, as well as a repeated condition from the 2015 permission requiring an impact study of the existing water supply infrastructure.

CIL

878. The proposed uses within the detailed part of this application are not uses which are CIL liable under the Sevenoaks CIL Charging Schedule.
879. The residential development would be liable for CIL and the extent of CIL liability would be determined at the reserved matters stage, once the liable floorspace were established. This is as required by the CIL regulations. CIL contributions are intended to fund infrastructure to help support development.

Infrastructure providers would be able to bid for funds in line with the Council's existing CIL spending procedures. As Sevenoaks District Council is a CIL charging authority, it would not be reasonable to secure other financial contributions for infrastructure.

Findings of the Environmental Statement

880. The application is accompanied by an Environmental Impact Assessment (ES) in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. An update to the ES was provided with the amendments to the scheme in September 2020 which re-assessed some areas.

881. The main body of the report above addresses much of the implications identified by the Environmental Statement. However in summary, the following conclusions were found by the Environmental Statement.

Socio-economics

882. The socio-economic effects centre on the impacts of the proposed development arising from the additional resident population and workforce it generates, the temporary and permanent employment arising from construction and the development of business premises, its contribution to the local housing supply and the demand for and supply of a range of social and community infrastructure including education and health facilities, sport, leisure facilities and green infrastructure.

883. In terms of construction, the major investment sustained over the period to 2030 could create demand for an average of 313 workers a year to deliver the proposed development.

884. Population estimates at 232-242 in Year 1 and 1,521-1,815 for the completed development.

885. The proposed development could support 1,366 to 1,438 jobs in employment premises on the application site, a further 410-431 jobs linked to how businesses on site buy materials, goods and services, and how people who work in those businesses spend their income. Households in the completed proposed development would spend their income, and it is estimated that this could support a further 90-103 jobs elsewhere in the economy. This will increase the opportunities to live and work in the area.

886. In terms of labour force, on completion, the proposed development could have up to 1,071 economically active and 998 employed residents.

887. The delivery of up to 635 new dwellings will add to and diversify the area's housing stock, and will deliver new affordable homes.

888. Residents of the proposed development will generate demand for and support local services and facilities. These are significant socio-economic effects which need to be managed through the design of the proposed development and the financial resources that will be raised from it through the application of the

Community Infrastructure Levy. This includes demand for school spaces, health services, and sports and leisure facilities.

Landscape and visual amenity

889. In terms of the construction phases, there would be changes to the character and visual resource of the site itself and these would be adverse, however given the screening from perimeter vegetation, impacts would be localised and not intrusive in the surrounding landscape. Removal of buildings currently visible above and beyond the perimeter vegetation and removing of the surrounding fencing is considered beneficial. Overall no significant impacts to the landscape and visual resource are concluded during the construction phase.
890. In terms of the operational development, the development is considered to improve the visual amenity and character of the application site and the visual amenity of the adjacent Public Right of Way would be substantially improved by the removal of the perimeter fencing.
891. Beyond the application site based on the maximum spatial and height parameters, the proposed development would be generally contained by the perimeter vegetation. In short range views to the north, around Otford Lane, certain parts of the employment area / village centre may just break above the tree line, although would not be a prominent feature in view and would be consistent with the baseline views of existing buildings and structures protruding above the perimeter woodland.
892. Along Pole Hill and Star Hill respectively, the proposed development is generally screened by the perimeter woodland, with the exception of minor changes to the existing access points into the site. From the south, at the base of the scarp slope and around the M25 / A224, the proposed development will not be visible, set back from the scarp slope and sitting below the tree line.
893. In middle to longer distance views to the east and south, from areas of higher ground around Otford and Sevenoaks, the proposed development would be generally screened by the perimeter woodland. Any visible structures that just break above the tree line would be indiscernible at this distance and there would be no perceptible change to baseline views.
894. Beneficial changes to the night time environment are likely, for example through the use of modern lighting to reduce lightspill and glare.
895. Overall the ES concluded that the proposed development will not result in any significant adverse landscape and visual effects.

Historic Environment

896. The ES concludes a moderate adverse significance of effect due to the removal of some non-designated heritage assets. This will be mitigated by building recording to provide additional information regarding their historic development, architectural interest and the development of the wider Fort Halstead site. This will not only assist in off-setting the harm caused by the

loss of these buildings, but it will also potentially enhance our understanding of the extant designated and non-designated heritage assets within the site.

897. The loss of historic context and functional relationships would result in a major adverse significance of effect to the scheduled monument. This is due to a loss of historic context. There would also be moderate adverse or minor adverse significance of effect to those listed buildings within the site for the same reason.
898. Overall the nature of the impacts and the significance of effect is not predicted to change for the current scheme when compared with the extant permission.
899. The impacts would be partly offset by the provision of new viable uses for the retained buildings and appreciation through public access and creation of new views and a heritage trail. Building recording would also be undertaken.
900. The scope and programme of the appropriate archaeological phasing of works would need to be confirmed with KCC and other mitigation and protection measures secured. There may be unknown archaeological remains on the site which could be subject to impacts from the construction phase. Following all mitigation all archaeological receptors are anticipated to result in negligible effects.
901. The change in historic landscape character is concluded by the ES to be moderate adverse in significance.

Ground conditions

902. The ground conditions have been assessed through the production of Phase 1 desk-based research and Phase 2 ground investigation surveys. These were undertaken in June and July 2016 and November 2018.
903. The works undertaken has identified the following key risks; made ground within the existing waste compound was confirmed to be a source of lead, PAH and petroleum hydrocarbons (proposed for residential end use); made ground around the location of BH556 was confirmed to be a source of PAH when assessed against the Public Open space (Residential) end use proposed; previous site investigations have indicated that Made Ground was a source of Nickel, PAH and petroleum hydrocarbons at and within the vicinity of the Scheduled Monument; asbestos was encountered in made ground at a number of locations across the site.
904. Mitigation measures have been concluded as necessary to address the risks. This includes removal, treatment and replacement of contamination hotspots; installation of capping layer within landscaped areas and gardens; use of barrier pipe and clean service corridors for utilities; production of a CEMP, production of a foundation works risk assessment; further ground investigation post demolition.

Water resources and flood risk

905. The impacts of the demolition, construction and operation of the proposed development on the receptors assessed have been identified as generally having negligible effect prior to the implementation of mitigation measures.
906. The impacts of the demolition, construction and operation of the proposed development on the receptors assessed have been identified as generally having negligible effect prior to the implementation of mitigation measures. However, with the implementation of the proposed surface and foul water drainage system 'design interventions', moderate beneficial effects have been anticipated with respect surface water drainage (during the construction and operation phases) and foul water drainage (during the operation phase). Such beneficial effects are identified based on the proposed 'design interventions' which will: reduce the risk of surface water flood risk within the application site and downstream catchments; and, ensure the capacity of the receiving foul water sewer network and STW is not exceeded, demand on the foul water network is reduced compared to the baseline condition, and, human health, including that of future application site occupants, and the general population within the study area, is not adversely impacted.
907. Following implementation of the proposed mitigation measures, all potential residual effects are anticipated to remain as per that assessed premitigation, i.e. generally negligible effects, with the exception of moderate beneficial effects anticipated with respect surface water drainage (during the construction and operation phases) and foul water drainage (during the operation phase). In summary, the ES finds no adverse significant effects are anticipated as a result of the proposed development on water resources and flood risk, with moderate beneficial effects anticipated with respect surface and foul water drainage.

Biodiversity

908. The baseline ecological conditions at the site were identified during a suite of baseline ecological survey work completed by Middlemarch Environmental Ltd the period over 2018-2020. In the absence of mitigation, the main predicted construction phase effects are associated with direct habitat loss and potential displacement or disturbance of existing species on site. A Framework Ecological Mitigation Strategy (FEMS) has been produced, outlining appropriate avoidance, mitigation, compensation and enhancement measures which would ensure that the favourable conservation status of ecological features is maintained throughout the construction and operational phases of the development. The construction phase of the development will be controlled by a Construction Ecological Management Plan (CEMP) which will be informed by the FEMS and will include best practice methods to avoid any significant ecological impacts. Natural England Development Licences will need to be obtained as required, to prevent breaches of legislation with respect to bats, badgers and dormice.
909. Predicted operational phase effects include degradation of nature conservation sites and habitats due to recreational disturbance, loss of habitat value due to inappropriate management and disturbance to species from lighting and traffic movement. Proposed mitigation to address these predicted effects includes the implementation of the LEMP, appropriate post-development monitoring of

habitats and species, sensitively designed lighting proposals and implementation of a speed limit to reduce the risk of road mortality to species such as badgers. Subject to all mitigation measures being provided most predicted ecological effects can either be avoided entirely or reduced to negligible significance. The exception during the operational phase of the proposed development is the increased predation of reptiles, dormice and nesting birds by domestic pets which is anticipated to result in an adverse residual effect on populations of these species groups at the local (Site) level.

Transportation

910. This assessment considers the impact of traffic in terms of severance, fear and intimidation, pedestrian amenity, pedestrian delay, accidents and safety and driver delay as outlined within the Institute of Environmental Management and Assessment (IEMA) guidelines. These have been assessed in the construction (2023) and during the future operation (2035) scenarios. An alternative baseline scenario has also been added to assess the impact of the development against the Certificate of Lawfulness of Existing Use or Development (CLEUD).
911. The assessment of all the IEMA criteria found that during the construction period, the construction vehicles anticipated for the development are to have a negligible effect on the local network links assessed. A Construction Traffic Management Plan would be required.
912. The assessment found that for the alternative baseline scenario the links experience a reduction in the traffic in comparison to the CLEUD and that the criteria set out within the IEMA guidance show that the development would have a negligible effect in comparison to the CLEUD. On the basis of the assessments in the ES Addendum, it was concluded that the proposed development would have a negligible effect on all links considered.

Air quality

913. The air quality assessment was undertaken using a variety of information and procedures. To determine the baseline air quality conditions, NO₂ diffusion tubes were placed at eight locations at on and around the Site.
914. The main likely effects on local air quality during construction relate to dust. However, nuisance caused from dust is only likely to be experienced by those living within approximately 350m of the Site boundary. A range of measures to minimise or prevent dust would be implemented and it is considered that following mitigation measures the effects from nuisance dust emissions would be negligible.
915. Any emissions from equipment and machinery operating on site during the construction works associated with the development would be small in comparison to the emissions from the volume of vehicles travelling on roads surrounding the site. Such emissions would not significantly affect air quality

916. Computer modelling has been carried out to predict the effect of future traffic-related exhaust emissions on local air quality following the completion of the Development.
917. Following completion of the Development, and considering uncertainty in future emissions reductions, the Development is predicted to have a negligible effect on nitrogen dioxide and particulate matter concentrations. Therefore, the overall effect of the Development on air quality is concluded to be negligible.

Noise and Vibration

918. Baseline noise survey data has been used to model the site using acoustic software CadnaA and noise levels predictions at receptor locations have been derived from the models. The spatial extent of the assessment area covers the site and also the surrounding regions where existing noise sensitive receptors have been identified for assessment. The ES Addendum includes a detailed assessment of noise from Trace Mineral Explosives at QinetiQ.
919. Construction and demolition effects have been assessed in accordance with current guidance. Noise levels associated with demolition and construction activity (the construction phase) at the proposed development are predicted to be of moderate adverse significance in the short term at the closest noise sensitive receptors, when activity takes place at the closest site boundary.
920. The appointed demolition and construction contractors shall undertake works in accordance with an approved CEMP and noise from construction works will be regulated by standard methods of best practice and mitigation measures where appropriate.
921. Road traffic noise has been assessed using CadnaA acoustic modelling software in conjunction with predicted traffic flows for the development. Noise impacts associated with development generated road traffic are predicted to be negligible. Road traffic noise associated with construction and demolition is predicted to have a negligible impact at noise sensitive receptors. Subject to mitigation, policy requirements can be met.

Environmental Statement Summaries

922. In summary, the conclusions of the applicant's Environmental Statement find that the construction phase would result in beneficial impacts on employment.
923. It concludes the construction phase would have an adverse impact in terms of: landscape impacts on Crow Drive, Armstrong Close, Fort Road; the schedule Fort, some buildings on the site; currently unknown archaeological remains; historic landscape; noise and vibration;
924. The ES concludes that the operational stage of the development (once complete), would result in beneficial impacts on: population; employment; labour force; housing supply; landscape impacts of Darent Valley, Knockholt, Halstead Wooded Downs, public footpaths, the scheduled Fort and retained

buildings; nature conservation; foul water drainage; and, surface water drainage.

Other Matters

925. Other matters which have been raised through public consultation and not discussed above, include the following:

926. Covid implications-

It is the case that there is uncertainty surrounding the future implications of the Covid pandemic on the economy, and on movement of people and their trends. However this does not provide sufficient reason to delay the determination of the application. The Transport Assessment baseline studies were undertaken in 2018, prior to the pandemic and viability testing also occurred prior to the pandemic.

927. Cumulative developments in the area

The previously emerging Local Plan proposed site allocations of which some were close to this application site. However as these allocations were not tested through the Local Plan examination process, they cannot be afforded any significant weight. It is the case that the proposals take account of other current approvals for major development sites in the area, however there is no policy requirement and it would not be considered reasonable for the application to take into account other sites which may possibly come forward or which may obtain planning permission in the future. We cannot make assumptions about their future. It would instead be the case that any major applications nearby would be required to take into account the cumulative impacts with any approval at Fort Halstead. The development includes the land for a school in response to the request of KCC through the Local Plan process to accommodate the local population increase arising from the potential site allocations. Despite the Local Plan falling away, this still forms part of the development proposals.

928. Stability of the highway at Polhill

This matter has been raised with the Highways Authority who are aware of the concerns regarding Polhill and the need for works to be undertaken. However they have not concluded that the impacts of this development give need for any mitigation measures or financial contributions for this work. Nor have they suggested that the impact on the stability of Polhill as a result of this development would be unacceptable.

929. Questions of the Local Plan Inspector remain unanswered

During the previously emerging Local Plan hearings the Inspector raised a number of questions regarding the proposed site allocation. However this is now of limited weight primarily as the questions related to the allocation of the site for a greater quantum of development and would have entailed the removal of the site from the Green Belt. It is considered that we have sufficient information to determine this current application.

930. Rights to Roam Access (Easting 548125 - Northing 159375)

It is our understanding that this relates to an area of land in Knockholt, outside the area of this application. Any grant of planning permission would

not override the need for the development to adhere to separate areas of legislation such as this.

Planning Balance and Conclusions

931. Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:

- Approving development proposals that accord with an up-to-date development plan without delay, or
- Where there is no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (including where the Local Authority cannot demonstrate a five year supply of deliverable housing sites or where the Housing Delivery Test indicated that the delivery of housing was substantially below (less than 75%) the housing requirement over the last three years- as is the case here), granting planning permission unless:
 - a. The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (including habitat sites and irreplaceable habitat sites; Green Belt; AONBs; designated heritage assets), or
 - b. 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.

932. The application of paragraph 11 is commonly called the ‘tilted balance’.

933. The above report has discussed that Sevenoaks District Council do not have a 5 year supply of housing sites and that the latest Housing Delivery Test results show that 70% of the overall housing need has been delivered over the previous three years. Under paragraph 11 the delivery can therefore be defined as ‘substantially below’ the housing requirement over the last three years. As such the tilted balance of paragraph 11 applies.

934. The report has found that the application of the NPPF policies that protect areas or assets of particular importance do not, in this case, provide a clear reason for refusing the development proposed. The impact of the development on these protected areas including Green Belt habitats sites and irreplaceable habitats has been found to be acceptable and the policies in the NPPF surrounding this issues do not provide a clear reason for refusing the development. The NPPF policy considerations of the impact on the heritage assets and the AONB, however, require further assessment against the public benefits of the proposals. These are discussed further below.

935. In respect of Green Belt policies, the development is appropriate development in the Green Belt, through delivering an affordable housing contribution to meet an identified need in the District and causing less than substantial harm to the openness of the Green Belt.

936. In respect of habitats, the development protects and provides opportunities for the enhancement and future management of the existing habitat sites and

protected trees and woodland which are proposed to form an integral part of the landscape character of the site and its sense of place. The development would not result in the loss or deterioration of irreplaceable habitats such as ancient woodland and ancient or veteran trees, as assessed under paragraph 175.

937. The proposals provide a new sustainable use to the designated heritage assets on the site and provide the opportunity for the opening up of the site to the public, increasing the appreciation of the sites unique heritage. The report concludes there is some harm to the designated heritage assets through the change of use and the alterations to the setting of those assets, and this harm is less than substantial.

938. Paragraph 196 of the NPPF requires that where a development proposal would lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

939. There are considered to be a number of notable public benefits arising from this proposal, these can be summarised as including:

- A significant contribution of 635 homes to the District's Housing Stock;
- An affordable housing contribution on site which contributes to an identified need in the District;
- Delivery of employment floorspace including a village centre with opportunities for community facilities including health care services;
- Safeguarding of land for a 1FE primary school;
- Increased connectivity of the site to the surrounding area including by public transport, cycle infrastructure, an improvements to local public footpaths and bridleways;
- Introducing public access to the site and to some of the heritage assets, improving the appreciation of the historical significance of those assets;
- Management of those heritage assets, both designated and none designated, to secure their long term future;
- Comprehensive management and maintenance of open spaces, woodlands and protected landscape within the site, including the opportunity for these to be appreciated publically;
- Landscape benefits including improvements to the light spill of the site and visual improvements including the removal of tall buildings and chimneys on the site which currently breach the height of the surrounding vegetation;

940. In terms of establishing whether the policies in the NPPF regarding the AONB give a clear reason for refusing the development, assessment is necessary under paragraph 172 of the NPPF. Among other things, this paragraph states: "Planning permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest." It adds "Consideration of such applications should include an assessment of:

The need for the development, including in terms of any national considerations, and the impact of permitted it, or refusing it, upon the local

economy; The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

941. It has been demonstrated that the proposals would have a positive impact upon the economy, both during construction and operational phases, for example through the provision of new homes and the increase in proposed employment floorspace beyond the 2015 permission, as well as proposed school and village centre uses. The proposals should be seen in the context of its site specific circumstances, that it is a large site soon to be vacated by DSTL which is a substantial employer in the District. The proposals provide the opportunity to maintain and increase jobs on the site and to keep an existing developed site within the AONB to a new use.
942. Alternatives have not been considered due to the status of this site and its existing allocations in the Development Plan. The site has previously been identified as a Major Development Site under the Core Strategy and was identified as one for additional growth in the previously emerging Local Plan.
943. The conclusions of this report find the proposals would overall conserve and enhance the AONB landscape and would not have a detrimental effect on the environment. The report above contains consideration of how the proposals comply with the aims of the AONB Management Plans (both existing and emerging), including how additional supporting information relating to the design of the development, has been provided in this instance in order to demonstrate that a truly landscape-led high quality development can be achieved. In light of the current character of the site, and its contribution to the AONB, it can be concluded that the proposals both conserve and enhance the special landscape character of the AONB and its distinctive character and natural beauty while including development.
944. There would be some adverse harm that is insignificant or of minor significance in the short term to biodiversity arising from the period of demolition and construction only. Future management and mitigation would improve the habitats on the site.
945. It is relevant that the site was already well established as a secure defence and research facility including a significant amount of development when the Kent Downs AONB was designated in 1968. The fall back position of the extant 2015 planning permission is also a material consideration of significant weight. It is considered that in terms of impact on the landscape character, the current application goes further to demonstrate that the development would be landscape-led and delivers a high quality sense of place to its future occupiers.
946. In conclusion in assessing the proposals against paragraph 172 in relation to the AONB, it is considered that the development is in the public interest through delivering public benefits and that the circumstances in this case are exceptional by reason of the site specific circumstances of this site. In terms of paragraph 11 then, the NPPF’s policies in relation to the AONB do not provide a clear reason for refusing the development proposed.

947. In conclusion of assessment under NPPF paragraph 11d)i) the application of policies in the NPPF that protect areas or assets of particular importance do not provide a clear reason for refusing the development.
948. For the assessment of the second part of Para 11d), it is considered that there would not be adverse impacts that would significantly and demonstrably outweigh the benefits of granting planning permission when assessed against the policies of the NPPF as a whole.
949. The report above identifies the many benefits that the proposals would bring to the site and to the landscape. While local concerns exist in particularly in terms of highways impacts of the development, it has been found that these impacts can be appropriately mitigated by conditions and planning obligations, which would result in highway and pedestrian safety being preserved, and the development would amount to a less than 'severe' impact on the highway in terms of its assessment under NPPF paragraph 107.
950. The proposals provide an opportunity to make efficient use of this historically previously developed land while celebrating its unique flora and fauna and heritage attributes, and making value contributions to the District's housing and employment offer, in line with the aspirations of the NPPF.
951. It is recommended that the application be approved and planning permission be granted subject to the conditions and legal agreement detailed above.

Background Papers

Site and Block Plan, Perimeter Plans and detailed site access plans.

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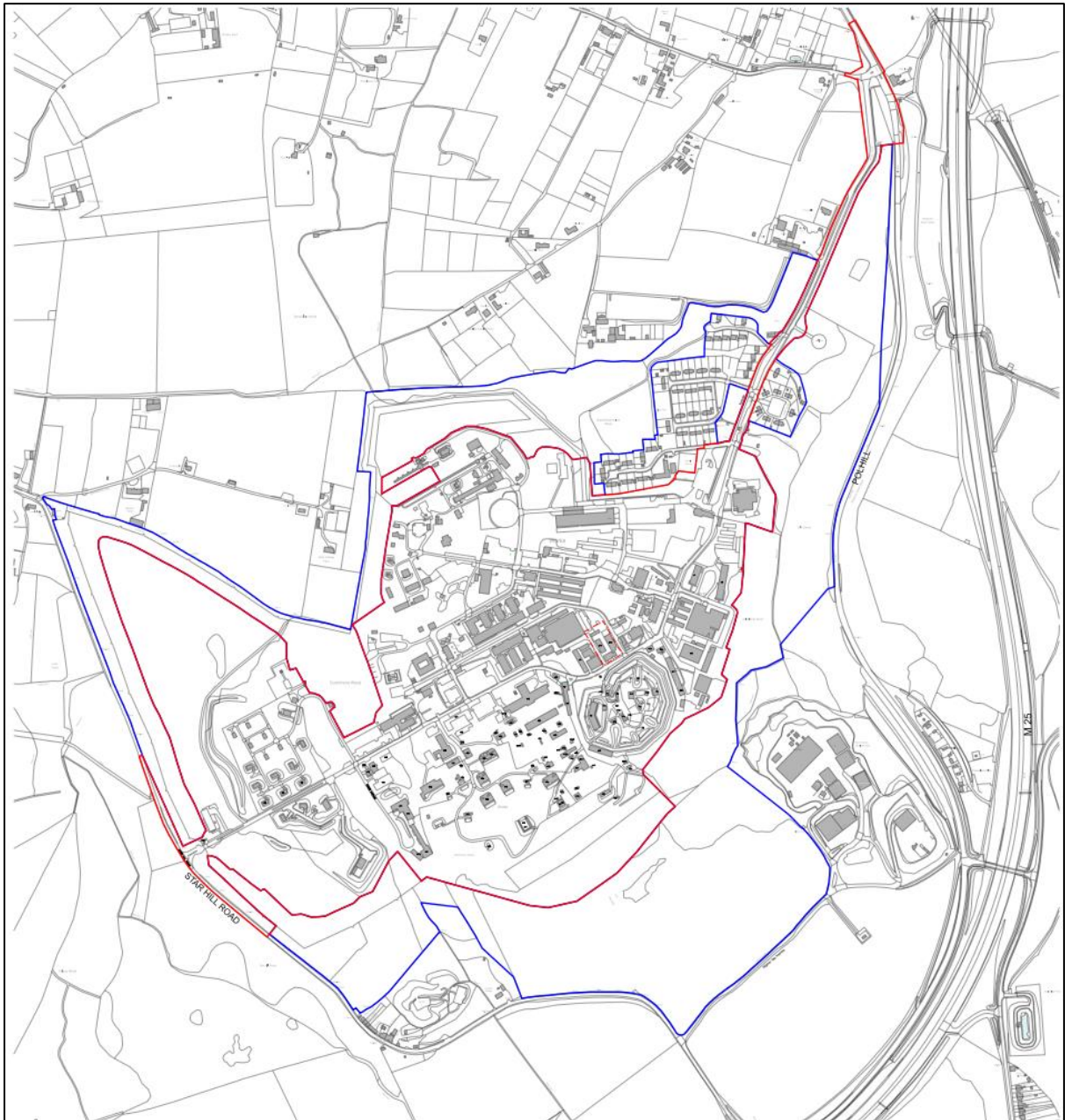
Deputy Chief Executive

Chief Officer - Planning & Regulatory Services

[Link to application details](#)

[Link to associated documents](#)

Site Location Plan



Indicative Site Layout

