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Background papers

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**ALLOCATIONS AND DEVELOPMENT MANAGEMENT PLAN**

**MAIN MODIFICATIONS  
DRAFT SUSTAINABILITY APPRAISAL UPDATE REPORT**

**JULY 2014**

ALLOCATIONS AND DEVELOPMENT MANAGEMENT PLAN

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## 1 Introduction

### Purpose of this Report

- 1.1 A Sustainability Appraisal (SA) was undertaken to support the emerging Sevenoaks District Allocations and Development Management Plan. The SA considers the impacts of the emerging plan in terms of the key sustainability issues.
- 1.2 A Sustainability Appraisal Report was published alongside the Allocations and Development Management Plan Draft for Submission (ADMP). This report included the appraisal of all the site allocations and development management policies within the Plan as well as the reasonable options
- 1.3 The Inspector examining the ADMP recommended a series of Main Modifications to the Plan. This update report sets out the sustainability appraisal of the Main Modifications and the implications for the ADMP as an update to the report at the time of submission.
- 1.4 The background to the ADMP and the previous Sustainability Appraisal Reports has been outlined in the ADMP Draft for Submission Sustainability Appraisal Report and this report should be read alongside it.
- 1.5 A Sustainability Statement will be published at the time of the adoption of the Allocations and Development Management Plan. This statement will outline how environmental, and in this case broader sustainability, considerations and consultation responses were reflected in the plan or programme and how its implementation will be monitored in the future.

Should you wish to comment on this SA Report, please do so in writing no later than xxx.

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## 2 Sustainability Appraisal/ SEA Directive

2.1 By law, DPDs are subject to Strategic Environmental Assessment (SEA) and SA. SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of plans and programmes including Local Plans.

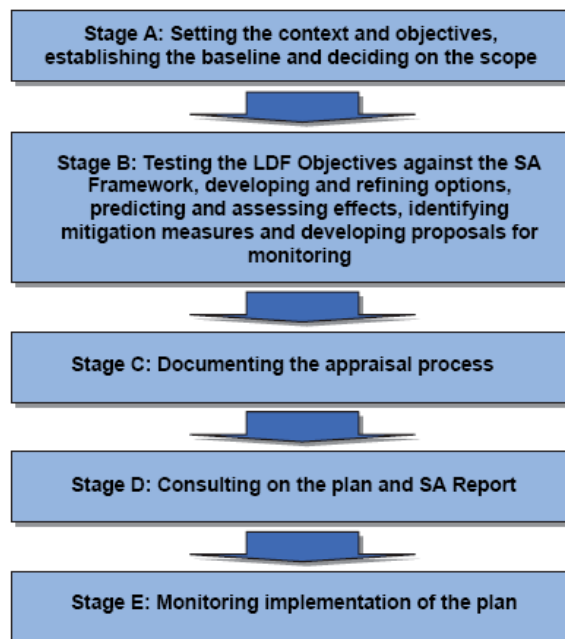
2.2 SA extends the concept of SEA fully to encompass economic and social concerns. Under the Planning and Compulsory Purchase Act 2004 (PCPA), SA should be undertaken for the constituent DPDs of the Local Plan. SA is therefore a statutory requirement for Local Plans along with SEA. The Government's approach is to incorporate the requirements of the SEA Directive into a wider SA process that considers economic and social as well as environmental effects. To this end, the Department for Communities and Local Government (CLG) Plan Making Manual provides detailed guidance as to the approach to be taken to SA and SEA. The combined SEA/SA process is referred to in this document as SA.

2.3 The Guidance advocates a five-stage approach to undertaking SA (see below).

Stage A involves establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which each DPD can be assessed – together with the evidence base that will help to inform the appraisal.

The subsequent stages of the SA process involve the main body of appraisal work including developing and refining options and assessing the effects.

Figure 1: The five stage approach to SA



**Sevenoaks Sustainability Objectives**

- 2.4 The Sustainability context is outlined in Section 2 of the January 2013 Sustainability Appraisal Report to accompany the submitted Allocations and Development Management Plan.
  
- 2.5 The purpose of the SA, according to the SEA Directive, is to undertake an appraisal of the ‘social, environmental and economic effects of plans, strategies and policies’ from the outset of the Local Plan process, so that decisions can be made which accord with the objectives of sustainable development. The Government’s objectives for sustainable development are set out in the revised strategy document entitled ‘Securing the Future – UK Government Sustainable Development Strategy’ (Defra, 2005).
  
- 2.6 The five guiding principles of the strategy are identified as:-
  - Living Within Environmental Limits;
  - Ensuring a Strong, Healthy and Just Society;
  - Achieving a Sustainable Economy;
  - Promoting Good Governance; and
  - Using Sound Science Responsibly.
  
- 2.7 In 2005 Consultants Scott Wilson carried out a SA Scoping Report on the Local Plan that covered the key DPDs proposed at the time, including the issues surrounding the Core Strategy. A set of 13 key sustainability objectives were derived as a result of this scoping exercise. Following production of the SA Scoping Report Update the Council considers them to remain relevant.

**Sustainability Objectives of the Local Plan derived from the Scoping Stage**

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1	To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
2	To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment
3	To improve the health and well-being of the population and reduce inequalities in health
4	To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest
5	To improve accessibility for everyone to all services, facilities, recreational opportunities and employment
6	To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve
7	To conserve and enhance biodiversity and geodiversity
8	To protect, enhance and make accessible for enjoyment, the countryside and the historic environment
9	To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure
10	To create a high quality built environment
11	To promote sustainable forms of development and sustainable use of natural resources
12	To encourage high and stable levels of employment and sustain economic competitiveness
13	To improve the development and retention of skills

2.8 This Main Modifications SA Update Report therefore follows the same approach to that which was adopted with the Core Strategy and Allocations and Development Management Plan and assesses the Main Modifications outlined by the Inspector to the ADMP.



### 3 Methodology

#### Traffic Light Assessment

- 3.1 The Main Modifications SA Update Report uses the process of appraising individual sites and policies against the Local Plan sustainability objectives and utilised a traffic light assessment method to measure the impacts of policy proposals. The purpose of the traffic light assessment was to establish the positive and negative aspects of sustainability against the objectives of the Local Plan.
- 3.2 The traffic light system was preferred for assessing sites rather than risk false precision by giving a numerical sustainability rating. For example if the sites were assessed on a numerical basis rather than the traffic light system, the comparison between a score of 10 and 5 would imply that the former is twice as good as the latter, which is unlikely to be the case.
- 3.3 A guide to the traffic light approach is included overleaf.

## Guide to Traffic Light Policy Assessment

++	<i>A very positive assessment is judged to be where the allocation of the site will have a very positive impact on the sustainability objective.</i>
+	<i>A positive assessment is where the site allocation will have a generally positive impact on that sustainability objective but is not the most sustainable option.</i>
0	<i>A neutral assessment is can be where the site allocation is irrelevant to the sustainability objective or where no material impact is likely to occur. A neutral assessment may also be given where the allocation can potentially have an equal positive and negative impact resulting in an overall neutral score.</i>
-	<i>A negative assessment is where the allocation of the site is likely to have a negative impact on that sustainability objective. This negative impact could potentially be offset through mitigation measures.</i>
--	<i>A very negative assessment applies where the site allocation conflicts with the sustainability objective and is unlikely to be totally offset by mitigation measures.</i>

### Assessment

- 3.4 Policies and Sites are considered against the sustainability objectives, which are supported through an extensive evidence base. A full list of the supporting evidence base is available on the Council’s website [www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk).
- 3.5 All policies and sites have been given an initial rating for each objective using the traffic light methodology as detailed above.

## 4 Assessment of the Main Modifications

4.1 Taking into consideration the methodology described, the main modifications have been assessed for their contribution and impact upon the key sustainability objectives of the Local Plan (as derived through the original scoping report of the SA).

A summary of the assessments can be found in the table below:

		<b>Modification</b>	<b>Soundness reason</b>	<b>Summary of the Sustainability Appraisal</b>
MM1	New policy	New policy EN5 - Landscape (see HDC49)	Consistent with national policy	An appraisal has been carried out for this policy. The policy is consistent with the policies within the Core Strategy and the other proposed ADMP policies and therefore does not have any significantly negative impacts.
MM2	Policy H1(c)	Change Gasholders Site boundary (para 4.2.4 of Council's Statement on Matter 4)	Justified	The appraisal for this allocation will be updated. No change is anticipated.
MM3	Policy H1(o)	Warren Court buffer and amended housing area/figures (see HDC58)	Justified	The appraisal for this allocation will be updated. No change is anticipated.
MM4	Policy H2(a)	Include Sevenoaks Delivery Office within boundary of H2(a) and up-date guidance (see para 4.27.1 of Council's Statement on Matter 4)	Justified	The appraisal for this allocation will be updated. No significant change is anticipated.
MM5	Policy H2(f)	Powder Mills - introduction of flexibility regarding the retention of Building 12 (see HDC62)	Justified and effective	The appraisal for this allocation will be updated. No change is anticipated.
MM6	See CS policy LO 6	Release of land at Edenbridge (see para 4.13.14 of Council's Statement on Matter 4 and HDC48)	Positively prepared, justified and effective	An appraisal will be carried out for this allocation taking into account the appraisal carried out for the Core Strategy Draft for Submission. The appraisal is not expected to identify any significantly negative impacts.
MM7	Paragraph 4.6	Clarification regarding the relationship between ADMP and CS policy SP8 (see HDC 52a)	Justified	No change to the SA is anticipated.
MM8	Policy EMP3	Clarify policy on Fort Halstead	Positively prepared, justified and effective	The appraisal for this allocation will be updated. Changes to the appraisal are anticipated to take account of additional housing.

MM9	Policy EMP4	Removal of open space designation at Broom Hill, Swanley (see HDC34)	Justified	The previous appraisal will be removed as it is no longer relevant.
MM10	Implementation and Monitoring	Performance indicators (see para 11.1.2 of Council's Statement on Matter 11)	Effective	No change to the SA is anticipated
MM11	Implementation and Monitoring	Proposed targets (see para 11.1.5 of Council's Statement on Matter 11)	Effective	No change to the SA is anticipated
MM12	Implementation and Monitoring	CS targets added (see para 11.2.3 of Council's Statement on Matter 11)	Effective	No change to the SA is anticipated

## MM1 – New Policy EN5 – Landscape

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 would conserve and enhance the character of the landscape and have regard to the relevant Management Plan and associated guidance.

Proposals that affect the landscape throughout the District will be permitted where they would

- a) conserve the character of the landscape, including areas of tranquillity, and
- b) where feasible help secure enhancements in accordance with landscape actions in accordance with the Sevenoaks Countryside Assessment SPD.

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SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	o	Policy EN5 does not contain any criteria that contributes or conflicts with this strategic sustainability objective.	No mitigation measures identified at this stage.
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	+	Policy EN5 seeks to conserve the natural features of the landscape including naturally occurring flood defences.	No mitigation measures identified at this stage.
3. To improve the health and well-being of the population and reduce inequalities in health	+	Policy EN5 seeks to conserve the landscape which plays an important role in maintaining health and well being.	No mitigation measures identified at this stage.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	Policy EN5 does not contain any criteria that contributes or conflicts with this strategic sustainability objective.	No mitigation measures identified at this stage.
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	Policy EN5 contains an approach that seeks to conserve the character of the landscape which includes important recreational opportunities	No mitigation measures identified at this stage.
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	o	Policy EN5 does not contain any criteria that contributes or conflicts with this strategic sustainability objective.	No mitigation measures identified at this stage.
7. To conserve and enhance biodiversity and geodiversity	+	Policy EN5 seeks to conserve and enhance the character of the landscape including the biodiversity and geodiversity of the landscape.	No mitigation measures identified at this stage.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	++	Policy EN5 seeks to conserve and enhance the character of the landscape including areas of outstanding natural beauty ensuring new development does not have a detrimental impact.	No mitigation measures identified at this stage.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	o	Policy EN5 does not contain any criteria that contributes or conflicts with this strategic sustainability objective.	No mitigation measures identified at this stage.
10. To create a high quality built environment	+	Policy EN5 seeks to conserve and enhance the character of the	No mitigation measures

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		landscape including areas of outstanding natural beauty ensuring new development does not have a detrimental impact.	identified at this stage.
11 To promote sustainable forms of development and sustainable use of natural resources	o	Policy EN5 does not contain any criteria that contributes or conflicts with this strategic sustainability objective.	No mitigation measures identified at this stage.
12. To encourage high and stable levels of employment and sustain economic competitiveness	o	Policy EN5 does not contain any criteria that contributes or conflicts with this strategic sustainability objective.	No mitigation measures identified at this stage.
13. To improve the development and retention of skills	o	Policy EN5 does not contain any criteria that contributes or conflicts with this strategic sustainability objective.	No mitigation measures identified at this stage.

Summary & Cumulative Impacts	Mitigation Measures
<p>Policy EN5 seeks to conserve and enhance the character of the landscape within Sevenoaks District and gives the highest level of protection for the AONB. This will have a number of positive impacts in relation to the objectives that seek to reduce flood risk, improve health and well being, improve access to the countryside, conserve biodiversity and to create a high quality built environment.</p> <p>The policy will therefore have significant positive impacts.</p>	<p>No mitigation measures identified at this stage.</p>

## MM2 – H1 (c) Sevenoaks Gasholder Station, Cramptons Road -39 Units

Change of the Gasholder Station boundary to increase site area from 0.88ha to 0.98ha and therefore the total number of units on site from 35 to 39 (para.4.2.4 of Council’s Statement on Matter 4)

Appraisal has been updated. No change in the scores and overall impact.

SA Objective	Score	Predicted effect	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainability constructed and affordable home	++	Development of housing at the site would have a very positive impact in relation to this objective and would result in the delivery of an element of onsite affordable housing or a financial contribution towards offsite provision.  Sites would be subject to Core Strategy Policy SP2 that required Code for Sustainable Homes Level 3 standard construction.	Requirement of suitable conditions and legal agreements to ensure delivery of affordable housing and to ensure Code for Sustainable Homes level 3 is met.  Any site remediation, if required, should be carried out by the site owner before disposal or will be required to be signed off by the site owner before the site transaction is completed. Site remediation should not preclude development opportunities on this site.
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	o	The site is currently a redundant gasholder station and as such is considered to be previously developed.  There would not be an adverse impact in relation to flooding through the development of this site.	Development should include mitigation measures such as SUDs, if appropriate and required at the detailed design stage.
3. To improve the health and well-being of the population and reduce inequalities in health	o	Whilst the development of housing would be a more desirable neighbour than a gas storage station the redevelopment would not have a demonstrable impact upon improving health and well being of the District’s population nor impact upon inequalities in health.	No mitigation measures identified at this stage.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	o	Development of housing at the site would not have a demonstrable impact upon improving issues of social exclusion or reducing the gap between the most deprived areas.	No mitigation measures identified at this stage.
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	The site is located in a sustainable location on the outskirts of Sevenoaks. There is easy access to shops and services approximately 500m south	An existing footpath bisects site. In order to maintain the existing level of accessibility pedestrian access should be retained.

		of the site on St Johns Hill. There are also good public transport links in the vicinity and employment opportunities at the nearby Vestry Estate.	Site should link in to proposed cycle route on Cramptons Road.
6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	o	The development of new housing would have a negative impact in respect to greenhouse gas emissions that result from the new units. However the promotion of new dwellings in a sustainable location is recognised as a being important in reducing the need to travel and reducing vehicle pollutants. Based on these two factors the negatives are considered to be balanced out by the positives resulting in a neutral assessment.	Core Strategy Policy SP2 requires Code for Sustainable Home construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission. Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.
7. To conserve and enhance biodiversity and geodiversity	o	The site is currently a gas holder station and as such is limited ecological potential at present. Whilst a redevelopment that includes Green Infrastructure requirements would be benefit it is not considered that this would be sufficient to warrant a very positive assessment.	Green Infrastructure requirements to be built into the site allocation and to be integral in the design process.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	o	The site is located on the edge of the existing main District settlement and as such there is no existing or future scope for increasing access to the countryside.  The historic element of Sevenoaks Town is sufficient distance away so as not to be impacted upon by this development.	No mitigation measures identified at this stage.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	The site is located close to the Bat and Ball Railway station and local bus stops. There are also good links to local employment opportunities, shops, services and community and recreational facilities in the Otford and St Johns Hill area.	Existing footpath bisects site – pedestrian access to be retained. Site should link in to proposed cycle route on Cramptons Road
10. To create a high quality built environment	++	The site is currently a gasholder station of reasonably poor environmental quality. Redevelopment would result in a significant improvement in quality of the built environment.	Ensure design is of a high quality and development is of a suitable nature for the location. Matter to be considered in detail through the Development Control process.
11 To promote sustainable forms of development and sustainable use of natural resources	++	The site is located in close proximity to the Bat and Ball Railway Station and local bus stops. There are also good links to local employment opportunities at the Vestry estate and shops,	No mitigation measures identified at this stage.



		services and community and recreational facilities all within walking distance, thereby reducing the need for vehicular travel.	
		The site is previously developed and would constitute a prudent use of a natural resource.	
12. To encourage high and stable levels of employment and sustain economic competitiveness	o	The gasholder station is currently redundant. The development would not result in any loss of employment and as such there is not considered to be a demonstrable impact in relation to this objective.	No mitigation measures identified at this stage.
13. To improve the development and retention of skills	o	The redevelopment would not impact upon the development or retention of skills in any way.	No mitigation measures identified at this stage.

Summary & Cumulative Impacts	Mitigation Measures
<p>The development of the site for residential would have very positive impacts in relation to sustainability objectives that seek to provide high quality and sustainable housing and that promote development in sustainable locations that reduces the need for vehicle use.</p> <p>The site is also previously developed and would increase the quality of the built environment.</p> <p>The cumulative impact of the proximity to the waterworks site (H1(b)) would not have a materially greater impact on the sustainability objectives.</p>	<p>Sustainable Home construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission.</p> <p>Development should include mitigation measures such as SUDs, if appropriate and required at the detailed design stage.</p> <p>Any site remediation, if required, should be carried out by the site owner before disposal or will be required to be signed off by the site owner before the site transaction is completed. Site remediation should not preclude development opportunities on this site.</p> <p>Green Infrastructure requirements to be built into the site allocation and to be integral in the design process.</p> <p>Existing footpath bisects site – pedestrian access to be retained. Site should link in to proposed cycle route on Cramptons Road.</p> <p>Design matters to be considered in detail through the Development Control process.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p>

## MM3 – Policy H1 (o) Warren Court Farm, Halstead

The hashed woodland buffer has been removed from the map and the Net area has been increased to 1ha and therefore the approximate net capacity for housing is increased to 25.

Appraisal has been updated. No change in the scores and overall impact.

SA Objective	Score	Predicted effect	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	++	Development of housing at the site would have a very positive impact in relation to this objective and would result in the delivery of an element of onsite affordable housing or a financial contribution towards offsite provision.  Sites would be subject to Core Strategy Policy SP2 that required Code for Sustainable Homes Level 3 standard construction.	Requirement of suitable conditions and legal agreements to ensure delivery of affordable housing and to ensure Code for Sustainable Homes level 3 is met.
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	o	The site is currently an under performing business site and as such is considered to be previously developed. There would not be an adverse impact in relation to flooding through the development of this site.	Development should include mitigation measures such as SUDs, if appropriate and required at the detailed design stage.
3. To improve the health and well-being of the population and reduce inequalities in health	o	Development of housing at the site would not have a demonstrable impact upon improving health and well being of the District's population nor impact upon inequalities in health.	No mitigation measures identified at this stage.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	o	Development of housing at the site would not have a demonstrable impact upon improving issues of social exclusion or reducing the gap between the most deprived areas.	No mitigation measures identified at this stage.
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	-	The site is located in a relatively unsustainable location within the village of Halstead. There are only basic facilities in the village centre.  Public transport links in the vicinity and also very basic resulting in a need for the use of private vehicles on a daily basis.	No mitigation measures identified at this stage.
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	-	The development of new housing would have a negative impact in respect to greenhouse gas emissions that result from the new units.	Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.

		<p>The promotion of new dwellings in an unsustainable location is recognised as having potential for an increase in vehicle pollutants.</p> <p>There are no specific concerns regarding Air Quality at the site.</p>	
7. To conserve and enhance biodiversity and geodiversity	o	<p>The site is currently a developed business site and as such is limited ecological potential at present. Whilst a redevelopment that includes Green Infrastructure requirements would be benefit it is not considered that this would be sufficient to warrant a very positive assessment.</p>	No mitigation measures identified at this stage.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	++	<p>The site is within a village adjacent to the settlement boundary and as such new occupiers will have good opportunities to access the open countryside.</p> <p>The historic element of Halstead village will not be adversely impacted upon by this development but are fully accessible for future residents.</p>	No mitigation measures identified at this stage.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	--	<p>Public transport is limited to a fairly infrequent bus service and there are very few local facilities, which reduce the need to travel. The development of the site will have occupants that are reliant on private vehicle.</p>	No mitigation measures identified at this stage.
10. To create a high quality built environment	+	<p>The site is currently a poor quality underutilised employment site.</p> <p>Redevelopment would result in a significant improvement in quality of the built environment.</p>	Ensure design is of a high quality and development is of a suitable nature for the location. Matter to be considered in detail through the Development Control process.
11 To promote sustainable forms of development and sustainable use of natural resources	-	<p>There is not a good range of local employment opportunities, shops or services in Leigh Village resulting in the need for people to travel.</p> <p>The site does constitute a prudent use of a natural resource as it is previously developed land.</p>	No mitigation measures identified at this stage.
12. To encourage high and stable levels of employment and sustain economic competitiveness	--	<p>The site is in current employment use and the development would result in the loss of employment land, albeit evidence has been presented that demonstrates the site is poor</p>	No mitigation measures identified at this stage.

13. To improve the development and retention of skills	- -	<p>quality employment land.</p> <p>The redevelopment would result in the loss of employment land and therefore could impact upon the development or retention of skills.</p> <p>No mitigation measures identified at this stage.</p>
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<b>Summary &amp; Cumulative Impacts</b>	<b>Mitigation Measures</b>
<p>The development of the site for residential would have very positive impacts in relation to sustainability objectives that seek to provide high quality and sustainable housing.</p> <p>Halstead is considered to be an unsustainably located and does not have a good range of shops, facilities or employment opportunities in close proximity, resulting in the need to travel to access these opportunities.</p> <p>The very negative impacts relate to the loss of employment land and the knock on impact for skills development.</p>	<p>Sustainable Home construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission.</p> <p>Development should include mitigation measures such as SUDs, if appropriate and required at the detailed design stage.</p> <p>Design matters to be considered in detail through the Development Control process.</p> <p>Green Infrastructure requirements to be built into the site allocation and to be integral in the design process.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p>

## MM4 – Policy H2(a) Delivery & Post Office/ BT Exchange, South Park, Sevenoaks (Retail and Residential) - 42 Units

Inclusion of the Delivery & Post Office. Increase in the Gross and Net Area from 0.36Ha to 0.6Ha. Increase in the approximate net housing capacity from 25 to 42.

Appraisal has been updated. No change in the scores and overall impact.

SA Objective	Score	Predicted effect	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	<p>Development of mixed use development, including some residential at the site would have a positive impact in relation to this objective and would result in the delivery of an element of onsite affordable housing or a financial contribution towards offsite provision.</p> <p>Sites would be subject to Core Strategy Policy SP2 that required Code for Sustainable Homes Level 3 standard construction.</p>	<p>Requirement of suitable conditions and legal agreements to ensure delivery of affordable housing and to ensure Code for Sustainable Homes level 3 is met.</p> <p>Any site remediation, if required, should be carried out by the site owner before disposal or will be required to be signed off by the site owner before the site transaction is completed. Site remediation should not preclude development opportunities on this site.</p>
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	o	<p>The site is currently a mixture of retail, post office sorting office and a telephone exchange and offices.</p> <p>Redevelopment would not have an adverse impact upon surface water run off or potential for increased flood risk.</p>	Development should include mitigation measures such as SUDs, if appropriate and required at the detailed design stage.
3. To improve the health and well-being of the population and reduce inequalities in health	o	Development of a mixed use development at the site would not have a demonstrable impact upon improving health and well being of the District's population nor impact upon inequalities in health.	No mitigation measures identified at this stage.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	o	Development of a mixed use scheme at the site would result in a town centre with better retail and commercial offer that would potentially attract more visitors. Whilst it is considered that the town centre would be improved it is not considered that the proposal would have a demonstrable impact upon improving issues of	No mitigation measures identified at this stage.

		social exclusion or reducing the gap between the most deprived areas.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	++	The site is exceptionally well located with excellent access to shops, services, employment, public transport and recreational opportunities. The redevelopment for mixed use purposes will improve the services within the town centre and provide new dwellings with excellent access to these services.	No mitigation measures identified at this stage.
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	o	<p>The development of retail and residential would have a negative impact in respect to greenhouse gas emissions that result from the new units.</p> <p>The promotion of new dwellings in highly sustainable location and providing a better retail offer is recognised as a being important in reducing the need to travel and reducing vehicle pollutants.</p> <p>Based on the combination of these two factors the negatives are considered to be balanced out by the positives resulting in a neutral assessment.</p>	<p>Core Strategy Policy SP2 requires Code for Sustainable Home construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission.</p> <p>Measures could be introduced with regard to the residential development restricted to minimum levels on no car parking for the site in order to promote the use of public transport and local services.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p>
7. To conserve and enhance biodiversity and geodiversity	o	The site is currently fully developed and as such there is no ecological or geodiversity potential at the site. The development for mixed use will not significantly increase future potential because of the urban characteristics of the site in the town centre.	No mitigation measures identified at this stage.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	o	<p>The site is located in the town centre of the main District settlement and as such there is no existing or future scope for increasing access to the countryside.</p> <p>The historic elements of Sevenoaks Town are in close proximity and will be made more accessible to increased visitors and residents as a result of this allocation.</p>	No mitigation measures identified at this stage.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	The site is within the existing town centre. New residents will have excellent access to shops, services, facilities and public transport. The new	No mitigation measures identified at this stage.

		<p>retail offer will provide greater choice and reduce the level of retail expenditure lost to competing centres.</p> <p>Both of these aspects will result in a lesser need to travel as a result of the development, however only a single positive is given as a result of the loss of the post office retail and sorting office facility from the town.</p>	
10. To create a high quality built environment	+	The site currently consists of low quality buildings, all of which are of little merit. The redevelopment would likely result in an improvement in quality of the built environment.	Ensure design is of a high quality and development is of a suitable nature for the location. Matter to be considered in detail through the Development Control process.
11 To promote sustainable forms of development and sustainable use of natural resources	++	<p>The site is within the existing town centre. New residents will have excellent access to shops, services, facilities and public transport. The new retail offer will provide greater choice and help reduce the level of retail expenditure lost to competing centres. Both of these aspects will result in a lesser need to travel as a result of the development.</p> <p>The site is previously developed and would constitute a prudent use of a natural resource.</p>	No mitigation measures identified at this stage.
12. To encourage high and stable levels of employment and sustain economic competitiveness	+	Redevelopment of the site would include replacement retail and retention of the post office counter facility within the Town Centre and as such there would not be a net reduction in overall jobs nor have an adverse impact that would make the area less attractive for employers in the town. The redevelopment is likely to result in a more desirable town centre to the benefit of local businesses.	No mitigation measures identified at this stage.
13. To improve the development and retention of skills	+	The redevelopment is likely to result in a more desirable town centre to the benefit of local businesses that will likely positively impact upon the development and retention of skills.	No mitigation measures identified at this stage.

Summary & Cumulative Impacts	Mitigation Measures
The allocation of the Delivery & Post Office/BT Exchange for residential led mixed	Any site remediation, if required, should be carried out by the site owner before

<p>use development would have a positive impact in relation to the creating of new sustainable homes and new employment and skill generating opportunities.</p> <p>The site is sustainably located so there would be positive impacts in relation to the reduced need to travel and providing access to the shops, services and facilities.</p> <p>There would also be a positive impact in relation to improving the quality of the built environment.</p>	<p>disposal or will be required to be signed off by the site owner before the site transaction is completed. Site remediation should not preclude development opportunities on this site.</p> <p>Development should include mitigation measures such as SUDs, if appropriate and required at the detailed design stage.</p> <p>Core Strategy Policy SP2 requires Code for Sustainable Home and BREEAM construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission.</p> <p>Measures could be introduced with regard to the residential development restricted to minimum levels on no car parking for the site in order to promote the use of public transport and local services.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p>
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## MM5 – Policy H2 (f) Powder Mills (Former GSK Site), Leigh (residential and small scale employment retention) – 60 units

Introduction of flexibility regarding the retention of building 12.

Appraisal has been updated. No change in the scores and overall impact.

SA Objective	Score	Predicted effect	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainability constructed and affordable home.	++	Development of housing at the site would have a very positive impact in relation to this objective and would result in the delivery of a large element of onsite affordable housing or a significant contribution towards offsite provision.  Sites would be subject to Core Strategy Policy SP2 that required Code for Sustainable Homes Level 3 standard construction.	Requirement of suitable conditions and legal agreements to ensure delivery of affordable housing and to ensure Code for Sustainable Homes level 3 is met.  Any site remediation, if required, should be carried out by the site owner before disposal or will be required to be signed off by the site owner before the site transaction is completed. Site remediation should not preclude development opportunities on this site.
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	--	The site is currently a vacant pharmaceutical site and as such is considered to be previously developed. Whilst there would not be an adverse impact in relation to flooding through the development of this site, the access routes both have areas of flood zone 3 that cross them, which would impact upon safe entry and exit of the site in times of flooding.	Development should include mitigation measures such as SUDs, if appropriate and required at the detailed design stage.  Flood mitigation measures required to ensure safe entry and exist of the site.
3. To improve the health and well-being of the population and reduce inequalities in health	o	Whilst the development of housing would be a more desirable neighbour than an employment site the redevelopment would not have a demonstrable impact upon improving health and well being of the District's population nor impact upon inequalities in health.	No mitigation measures identified at this stage.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	o	Development of housing would not have a demonstrable impact upon reducing poverty and social exclusion.	Requirement of suitable conditions and legal agreements to ensure delivery of affordable housing.
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	--	The site is located in a very unsustainable location within Leigh. There is no easy access	Due to the number of dwellings proposed and the poor links to services at the site, a travel

		to shops and services without the use of a private vehicle.  There are not good public transport links in the vicinity and employment opportunities require the need to travel.	plan should be prepared to mitigate some of the travel impacts of the new development.
6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	--	The development of new housing would have a negative impact in respect to greenhouse gas emissions that result from the new units. This is heightened by the fact that the promotion of new dwellings in an unsustainable location is recognised as increasing vehicle pollutants.	Core Strategy Policy SP2 requires Code for Sustainable Home construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission. Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.
7. To conserve and enhance biodiversity and geodiversity	+	The site is currently used for pharmaceutical use and as such has limited ecological potential at present.  A redevelopment that includes Green Infrastructure requirements would be of benefit and it is considered that redevelopment could provide good links with the surrounding open countryside areas and increase biodiversity potential.	Green Infrastructure requirements to be built into the site allocation and to be integral in the design process.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	+	The site is currently used for pharmaceutical use, which has historic origins at the site. Redevelopment of the site would allow for public access to the historic Powder Mill areas that surround the site.  The site is Green Belt and as such future occupants would have excellent access opportunities to open countryside.	No mitigation measures identified at this stage.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	--	The site is located in a very unsustainable location within Leigh. There is no easy access to shops and services without the use of a private vehicle	Due to the number of dwellings proposed and the poor links to services at the site, a travel plan should be prepared to mitigate some of the travel impacts of the new development.
10. To create a high quality built environment	+	The site is currently a vacant pharmaceutical	Ensure design is of a high quality and

		<p>site, which whilst very well maintained and attractive is not of any significant environmental quality.</p> <p>Redevelopment would result in an improvement in quality of the built environment.</p>	<p>development is of a suitable nature for the location. Matter to be considered in detail through the Development Control process.</p>
11 To promote sustainable forms of development and sustainable use of natural resources	-	<p>The site is wholly unsustainable in terms of location and access to services and facilities. However it is previously developed and would constitute a prudent use of a natural resource if redeveloped.</p>	<p>No mitigation measures identified at this stage.</p>
12. To encourage high and stable levels of employment and sustain economic competitiveness	-	<p>The site is in current employment use and the development would result in the loss of employment land albeit a small element of employment will be retained.</p>	<p>No mitigation measures identified at this stage.</p>
13. To improve the development and retention of skills	-	<p>The redevelopment would result in the loss of employment land which is within a highly skilled industry.</p> <p>There would be some opportunity for retaining skills through the employment that is to be retained however it would not significantly impact upon the development or retention of skills.</p>	<p>No mitigation measures identified at this stage.</p>

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Summary & Cumulative Impacts	Mitigation Measures
<p>The allocation of Powder Mills for residential led mixed use development would have a positive impact in relation to the creation of new sustainably constructed homes.</p> <p>The development would have positive impacts in relation to the improved accessibility to the historic and archaeologically important aspects of the surrounding area that have previously been inaccessible to the public. There would also be an improvement to the quality of the built environment.</p> <p>There would be very negative impacts in relation to the fact that the site is remotely located with poor access to local facilities and services that would result in the need</p>	<p>Any site remediation, if required, should be carried out by the site owner before disposal or will be required to be signed off by the site owner before the site transaction is completed. Site remediation should not preclude development opportunities on this site.</p> <p>Development should include mitigation measures such as SUDs, if appropriate and required at the detailed design stage.</p> <p>Core Strategy Policy SP2 requires Code for Sustainable Home and BREEAM construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission.</p>

Agenda Item

<p>to travel. This has a subsequent negative impact upon air quality.</p> <p>There would be further negative impacts in relation to the loss of employment floorspace and reduced opportunity for skills retention. Albeit an independent study has shown there is no realistic prospect of the re-use of the entire site in employment generating uses.</p>	<p>Measures could be introduced with regard to the residential development restricted to minimum levels on no car parking for the site in order to promote the use of public transport and local services.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p> <p>Due to the number of dwellings proposed and the poor links to services at the site, a travel plan should be prepared to mitigate some of the travel impacts of the new development.</p>
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## MM6 – H1 (p) Land West of Enterprise Way, Edenbridge

The appraisal below has been carried out taking into account the appraisal carried out for the Core Strategy Draft for Submission.

SA Objective	Score	Predicted effect	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	++	Development of housing at the site would have a very positive impact in relation to this objective and would result in the delivery of an element of onsite affordable housing or a financial contribution towards offsite provision.  Sites would be subject to Core Strategy Policy SP2	Requirement of suitable conditions and legal agreements to ensure delivery of affordable housing and to ensure the required code level is met.
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	-	The site is dissected by an area of flood zone 3a and 3b as shown on the accompanying map. No residential development should be located within this area and sustainable drainage systems (SUDS) will be required as part of any scheme, together with a flood risk assessment. Residential development should be located north and south of the constrained flood area.  The site is currently Greenfield. As there would be a loss of open permeable land in favour of built development there would be an adverse impact in relation to flooding through the development of this site.	Residential development should not be located in areas likely to flood and should include mitigation measures such as SUDS.
3. To improve the health and well-being of the population and reduce inequalities in health	+	Development of housing at the site would have a positive impact upon improving health and well being of the District's population as a result of the public open space element that is included within the proposal. The provision of public open space allows for outdoor recreational purposes to the benefit of health and well being.	No mitigation measures identified at this stage.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The size and context of the site make it suitable for a range of housing types, sizes and tenures, including affordable housing in accordance with Council policy. This site is also considered suitable for housing designed for older people (including those with special needs), as it is close to a range of services that would provide for the	No mitigation measures identified at this stage.

		needs of future occupants.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	++	<p>The site is located in a sustainable location within Edenbridge.</p> <p>Provision of public open space will be required to support the development. The type and layout of open space will be a matter for consultation with the local community, but could include amenity greenspace, children’s playspace and allotments, as outlined in the Council’s Open Space Study.</p>	<p>Due to the number of dwellings proposed at the site a travel plan should be prepared to mitigate some of the travel impacts of the new development.</p>
6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	-	<p>The development of new housing would have a negative impact in respect to greenhouse gas emissions that result from the new units on greenfield land</p>	<p>Core Strategy Policy SP2 requires Code for Sustainable Home construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p>
7. To conserve and enhance biodiversity and geodiversity	o	<p>The site does not lie within any national or local nature conservation designations.</p> <p>The scheme will retain the TPO trees and include landscaping which is appropriate to the local landscape character. Buffers between the development and the railway lines, industrial state and existing residential development will provide biodiversity corridors that will enhance the green infrastructure network and make connections beyond the site.</p> <p>The river corridor should also include biodiversity enhancements. Site biodiversity surveys will be required to ensure any biodiversity concerns are adequately mitigated.</p>	<p>Green Infrastructure requirements to be built into the site allocation and to be integral in the design process.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p>

8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	+	The site lies adjacent to the greenbelt and therefore will need to be designed to minimise its impact on the Green belt/open farmland to the west and scheme design, including building heights and density, should reflect the edge of settlement location of this site.	No mitigation measures identified at this stage.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	++	The site is located within Edenbridge close to the Railway station and local bus stops. There are also good links to local employment opportunities, shops, services and community and recreational facilities in the Town Centre.	Due to the number of dwellings proposed at the site a travel plan should be prepared to mitigate some of the travel impacts of the new development.
10. To create a high quality built environment	+	The site is currently overgrown and non accessible open space, which is of reasonably poor quality for surrounding residents. Redevelopment would result in a significant improvement in quality of the built environment with potential for improved access to open countryside and an element of new accessible recreation space. On balance it is considered that whilst open space is being lost the redevelopment would enhance the quality of the built environment.	Ensure design is of a high quality and development is of a suitable nature for the location. Open space to be incorporated into the detailed design.
11 To promote sustainable forms of development and sustainable use of natural resources	+	<p>The site is located in a sustainable location close of existing residential and employment areas.</p> <p>The site is not previously developed and therefore would constitute a prudent use of a natural resource. However the fact that the site does not lie within the Greenbelt and is within the confines of the third largest town within the district it is concluded that the redevelopment results in a positive assessment for this site.</p>	Incorporation of public open space into the wider scheme required through design stage.
12. To encourage high and stable levels of employment and sustain economic competitiveness	o	The development of the site would not result in any loss of employment and as such there is not considered to be a demonstrable impact in relation to this objective. Additionally, Proposals should not prejudice the operation of the existing industrial estate	No mitigation measures identified at this stage.
13. To improve the development and retention of skills	o	The redevelopment would not impact upon the development or retention of skills in any way.	No mitigation measures identified at this stage.

Summary & Cumulative Impacts	Mitigation Measures
<p>The development of the site for residential would have very positive impacts in relation to sustainability objectives that seek to provide high quality and sustainable housing and that promote development in sustainable locations that reduces the need for vehicle use.</p> <p>The development would provide housing with good links to shops, services and employment opportunities would increase the quality of the built environment.</p> <p>The negative impacts upon the Council's sustainability objectives relate to the loss of greenfield land and the knock on negative impact upon air quality through greenhouse gas emissions and an increased risk of flooding.</p> <p>The cumulative impact of the site along with other developments in Edenbridge would not have a materially greater impact on the sustainability objectives.</p>	<p>Sustainable Home construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission.</p> <p>Development should include mitigation measures such as SUDs and no residential development should be built in areas likely to flood.</p> <p>Design matters to be considered in detail through the Development Control process.</p> <p>Green Infrastructure requirements will be built into the site allocations including where possible links to existing GI features to encourage biodiversity potential with garden areas.</p> <p>Due to the number of dwellings proposed at the site a travel plan should be prepared to mitigate some of the travel impacts of the new development.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p>



## **MM7 – Paragraph 4.6 -0 clarification regarding the relationship between ADMP and CS policy SP8**

No appraisal required as no change is made to any policies.

## MM8 –EMP3 Fort Halstead

Two options were appraised by URS in June 2014 for development at Fort Halstead. The result of these appraisals can be found in the June 2014 report and the findings have been incorporated into the revised EMP3 policy. The revised policy has been appraised below. The underlined sections are additions to the original policy as a result of the main modifications.

### Policy EMP3 - Redevelopment of Fort Halstead

Fort Halstead, as defined in Appendix 6, is allocated as a Major Employment Site in the Green Belt.

Redevelopment proposals will be expected to achieve a range of employment uses such as research and development serviced offices and workshops or land based employment, and generate at least the number of jobs that the site accommodated immediately prior to the announced withdrawal of DSTL from the site. Redevelopment may also include a hotel. Land based employment, such as the management of the woodland and downland will also be supported, subject to the criteria below.

Residential development of up to 450 units may also be permitted provided it forms part of a mixed used scheme that delivers an employment-led development and complies with other aspects of the policy.

The inclusion of appropriate community facilities and infrastructure to support the sustainable development of the site consistent with the policy will be required.

Redevelopment of the site will maintain or reduce the amount of built development on the site and be fully contained within the Major Employment Site Boundary. It should have no greater impact on the openness of the Green Belt. The height of the buildings must take into account the need to conserve and enhance the natural beauty of the countryside in this location.

Redevelopment proposals, ~~including those to widen the mix of uses on site, such as including an element of residential development and a hotel,~~ would be expected to:

- Be sustainable in respect of the location, uses and quantum of development and be accompanied by a Travel Plan incorporating binding measures to reduce dependency of future occupants on car use;
- Provide accessibility to jobs, shops and services by public transport, cycling or walking, including proposals for onsite provision proportionate to the proposed development;
- Make a positive contribution to the achievement of aims and objectives of the Kent Downs AONB Management Plan and conserve and enhance the natural beauty and tranquillity of the Kent Downs Area of Outstanding Natural Beauty;
- Confirm, by way of a Transport Assessment, that the development would not have an unacceptable adverse impact on the local and strategic road 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.

SA Objective	Score	Predicted effect	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	++	Development of housing at the site would have a very positive impact in relation to this objective and would result in the delivery of an element of onsite affordable housing or a financial contribution towards offsite provision.  Sites would be subject to Core Strategy Policy SP2	Requirement of suitable conditions and legal agreements to ensure delivery of affordable housing and to ensure the required code level is met.
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	+	The site is already developed as does not have any identified flood related issues. A redevelopment of the site in line with the policy is unlikely to have a negative impact on flooding and the inclusion of sustainable drainage is likely to result in a positive impact.	Residential development should include mitigation measures such as SUDs.
3. To improve the health and well-being of the population and reduce inequalities in health	+	The impact of redevelopment as a result of Policy EMP3 is difficult to assess however, it is likely that the policy will have an overall positive effect due to the inclusion of community facilities and the improvement of recreational opportunities. The provision of public open space allows for outdoor recreational purposes to the benefit of health and well being.	Ensure any public open space includes opportunities for recreation.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The size and context of the site make it suitable for a range of housing types, sizes and tenures, including affordable housing in accordance with Council policy. Any redevelopment of this site will also require inclusion of community facilities.	No mitigation measures identified at this stage.
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	o	The site is located in a relatively remote location away from any major centres. Any new housing on the site will require the residents to travel	Due to the number of dwellings proposed at the site a travel plan should be prepared to mitigate some of the travel impacts of the new

		<p>offsite for the majority of services. However, the policy requires some community facilities to be included within the development as well as improvements to the green infrastructure network which will allow recreation opportunities. The redevelopment will also include employment floorspace.</p>	<p>development.</p>
6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	+	<p>The site is currently developed and has associated carbon emissions. The buildings are not carbon efficient</p> <p>Any redevelopment would include buildings which are built to high levels of sustainability in accordance with the Council's policies. There is also an opportunity for renewable and decentralised energy schemes.</p>	<p>Core Strategy Policy SP2 requires Code for Sustainable Home construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p> <p>Investigate the possibility of a renewable or decentralised energy scheme</p>
7. To conserve and enhance biodiversity and geodiversity	-	<p>Large scale development is likely to have a negative impact on the ecology of the site although the majority of the site is already developed. Any redevelopment will need careful mitigation measures and must be in accordance with the Council's policies.</p>	<p>Green Infrastructure requirements to be built into the site allocation and to be integral in the design process.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p>
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	o	<p>The site is prominent in the landscape and the AONB and is adjacent to a scheduled ancient monument. The current use requires the site to be secure and prevents the accessibility of the site and monument to the public for enjoyment. Any redevelopment of the site would improve access to and management of the site and improve recreational opportunities.</p>	<p>No mitigation measures identified at this stage.</p>
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	-	<p>The occupants of any redevelopment will rely of the private car as the site is in a fairly remote location. 450 homes is also not a large enough number to necessitate the inclusion of substantial services and facilities. However, the</p>	<p>Due to the number of dwellings proposed at the site a travel plan should be prepared to mitigate some of the travel impacts of the new development.</p>

		policy requires some community facilities to be included as well as retained employment floorspace.	
10. To create a high quality built environment	+	Redevelopment of the site in accordance with the Council's adopted and emerging policies would result in an overall improvement to the design of the built environment.	Ensure design is of a high quality and development is of a suitable nature for the location. Open space to be incorporated into the detailed design.
11 To promote sustainable forms of development and sustainable use of natural resources	+	The site is previously developed and the reuse of this land is a sustainable use of natural resources. However, the site is in a fairly remote location and will require private car use.	Improvements of accessibility of site by public transport
12. To encourage high and stable levels of employment and sustain economic competitiveness	+	The retention of the employment floorspace in this location will be a key feature of any redevelopment.	No mitigation measures identified at this stage.
13. To improve the development and retention of skills	+	The current employment use at the site is quite specific and retention of some of this type of employment ensures the retention of skills within the district.	No mitigation measures identified at this stage.

Summary & Cumulative Impacts	Mitigation Measures
<p>The development of the site for residential would have very positive impacts in relation to sustainability objectives that seek to provide high quality and sustainable housing.</p> <p>The development will retain employment opportunities and skills as well as have positive impacts in regard to sustainable use of resources and an increase in the quality of the built environment.</p> <p>The negative impacts upon the Council's sustainability objectives relate to the remote location of the site. Any redevelopment will increase the need to travel by car and has the potential to have a negative effect on the biodiversity and geodiversity of the natural environment. Careful mitigation will be required to offset this effect.</p> <p>The site lies within the countryside and has the potential to have a negative impact. However, redevelopment will have a positive effect on making the countryside available for public enjoyment.</p>	<p>Sustainable Home construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission. Investigate the possibility of a renewable or decentralised energy scheme</p> <p>Development should include mitigation measures such as SUDs.</p> <p>Design matters to be considered in detail through the Development Control process.</p> <p>Green Infrastructure requirements will be built into the site allocations including where possible links to existing GI features to encourage biodiversity potential with garden areas.</p> <p>Due to the number of dwellings proposed at the site a travel plan should be prepared to mitigate some of the travel impacts of the new development. Improvements of accessibility of site by public transport.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p>

## **MM9 – Policy EMP4 Broom Hill**

Removal of the open space designation see (HDC34). Previous appraisal no longer relevant and no appraisal is required.

## **MM10 – MM12 Implementation and Monitoring**

No appraisal required as there is no change to policy

## 5 Summary and Recommendations

- 5.1 There are no significant changes to sustainability impacts as a result of the main modifications to the Allocations and Development Management Plan.
- 5.2 The Council should take on board the recommendations set out to mitigate and monitor the effects identified by the main report as well as those in this addendum. In the case of monitoring recommendations it is important to note that these are initial and in some cases aspirational ideas. It will be up to the Council to consider the practicalities of monitoring and what might be achievable.

## 6 Next Steps

- 6.1 The Main Modifications will be subject to a 6 week public consultation and the Inspector will consider the responses before issuing his report.
- 6.2 A sustainability statement will be published at the time of adoption of the Allocations and Development Management Plan. This statement will outline how sustainability considerations and consultation responses were reflected in the plan and how its implementation will be monitored in the future.







# Sustainability Appraisal (SA) of the Sevenoaks Allocations and Development Management Plan



Interim SA Report  
(Draft version for Committee)  
June 2014

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	June 2014	Interim SA Report presented to the Council  (Draft version for consideration by Committee)	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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## 1 INTRODUCTION

### 1.1 Background

1.1.1 The Sevenoaks Allocations and Development Management Plan (ADMP) is at an advanced stage of preparation, having been submitted to Government for Examination in November 2013. The ADMP, once adopted, will establish policy for the development of key sites and also establish district wide development management policy.

1.1.2 Examination hearings were held in March 2014, overseen by a Government appointed Planning Inspector. Subsequent to the hearings, on 14<sup>th</sup> April, the Inspector issued a note<sup>1</sup> to the Council identifying the need for further work with regards to Policy EMP3 on Fort Halstead. The Inspector reached this conclusion in-light of *“consideration of the written submissions, the debate at the hearing session and the further written representations submitted post-hearing.”*

1.1.3 The Inspector’s note suggests that ‘further work’ should involve appraising the merits of alternative policy approaches for the site. The intention is that *“The Council, having drawn conclusions on these matters, should draft a ‘new’ policy to reflect in more detail its aspirations for the site. This would have to be published as a Main Modification [to the submitted plan].”*

### 1.2 This Interim SA Report

1.2.1 The ADMP is being developed alongside a process of **Sustainability Appraisal (SA)**, a legally required<sup>2</sup> process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.<sup>3</sup>

1.2.2 The aim of **this Interim SA Report** is essentially to present the appraisal of alternative policy approaches to Fort Halstead in a timely fashion, i.e. in time to inform development of a preferred approach for consultation (‘publication as a Main Modification’). An SA Report<sup>4</sup> will then be prepared and published alongside that presents: 1) the appraisal of alternatives; 2) the Council’s reasons for developing the preferred approach in-light of the assessment of alternatives; and 3) an appraisal of the preferred approach (i.e. the proposed Main Mods).

1.2.3 This Interim SA Report sets out to answer four questions:

1. What’s the scope of the SA?
  - i.e. what are the parameters of the appraisal. This question is answered in light of dedicated ‘scoping’ work that has been undertaken (and has included consultation).
2. What has Plan-making / SA involved up to this point?
  - i.e. what work fed into the identification of a ‘reasonable’ range of alternative policy approaches to Fort Halstead.
3. What are the SA findings at this stage?
  - i.e. in relation to the Fort Halstead alternatives.
4. What happens next?
  - i.e. explain that the Council will develop a preferred approach and then publish that as a proposed Main Modification etc.

<sup>1</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0005/136418/PA-020-Note-from-Inspector-re-Fort-Halstead-7-4-14.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0005/136418/PA-020-Note-from-Inspector-re-Fort-Halstead-7-4-14.pdf)

<sup>2</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

<sup>3</sup> Directive 2001/42/EC

<sup>4</sup> The document published alongside Main Modifications might best be labelled an SA Report ‘Addendum’ on the basis that it sets out to inform consultation on Modifications only (as opposed to ‘the ADMP as modified’).

**2 WHAT’S THE SCOPE OF THE SA?**

- 2.1.1 The scope of SA work, with respect to the ADMP, is introduced within the SA Report published (and then subsequently submitted) alongside the Draft ADPM.<sup>5</sup> Essentially, the scope is explained by presenting a list of sustainability issues and objectives that together can be drawn on as a methodological ‘framework’ for appraisal. The discussion within the SA Report explains that the scope was established following review of the sustainability ‘context’ and ‘baseline’, as well as consultation.
- 2.1.2 The issues and objectives presented within the 2013 SA Report remain appropriate, i.e. remain fit for purpose at the current time, given the need for appraisal work to focus on alternatives for Fort Halstead. They are listed below – see Tables 2.1 and 2.2.
- 2.1.3 The scope of SA work at the current time – i.e. that presented within Chapter 4 of this report – is also influenced by **evidence-gathering work that has been undertaken over recent years in relation to Fort Halstead**. The evidence-base relevant to an appraisal of alternative policy options for Fort Halstead is helpfully summarised within the representations submitted to the ADMP Examination under ‘Matter 6: Fort Halstead’.<sup>6</sup>

*Table 2.1: Key sustainability issues identified for the purposes of the ADMP SA process*

Issue	Discussion
<b>Economic</b>	
Pockets of deprivation in an otherwise affluent area	Swanley St Mary’s (24th most deprived of the 331 wards in Kent and in the top 10% nationally), Dunton Green (34th), Swanley White Oak (61st) and Leigh (74th) (Sevenoaks District Housing Strategy). An overall impression of affluence masks some pockets of urban and rural deprivation. Some wards in the District suffer from higher than average unemployment rates, higher levels of poverty, poor health, low educational and skill levels and higher than average rates of crime (Sustainable Community Action Plan).
Constraints on development - Green Belt, AONB etc	Much of West Kent including Sevenoaks is subject to longstanding restraint on development and settlement expansion as a result of Green Belt, AONB and other constraint policies (Kent and Medway Structure Plan, South East Plan). There is a tension between the need for affordable places for local people and key/essential workers to live and the high percentage of the District that is Green Belt land (Sustainable Community Action Plan).
High levels of out-commuting	There remains significant leakage of the skills base as a result of outward commuting, with up to two thirds of West Kent resident commuters working in high skilled occupations (Area Investment Framework for West Kent).
Traffic congestion	Increasing vehicle movements and traffic congestion on arterial routes and in town centres (Area Investment Framework for West Kent, Sevenoaks Transport Study). Congestion could increase in the North of the District due to Ebbsfleet International Station (Context Review, Integrated Kent Rail Franchise).
Poor public transport	Poor public transport in rural areas (Kent Local Transport Plan). There are major gaps in the current bus network to the north east of the District, as well as poor access to and from the villages between Sevenoaks Town and Chiddingstone (Sevenoaks Transport Study).
Lack of higher education provision and skills shortages.	The comparative lack of Higher Education provision in West Kent often results in young people leaving West Kent in order to pursue their higher education and subsequent careers (Area Investment Framework for West Kent).

<sup>5</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0005/109904/Sustainability-Appraisal-ADMP-Report-jan-2013-final-version.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0005/109904/Sustainability-Appraisal-ADMP-Report-jan-2013-final-version.pdf)

<sup>6</sup> See @ [/www.sevenoaks.gov.uk/services/housing/planning/planning-policy-and-the-local-development-framework/allocations-and-development-management-plan/admp-examination/examination-library-and-statements/statements](http://www.sevenoaks.gov.uk/services/housing/planning/planning-policy-and-the-local-development-framework/allocations-and-development-management-plan/admp-examination/examination-library-and-statements/statements)

Thames Gateway and Ashford Growth Areas	Threat of competition from Kent's Growth Areas (Kent Prospects). This could impact on retail, increase out commuting etc.
Employment land	<p>Constraints on greenfield development coupled with strong housing markets and land values have resulted in substantial reinvestment in the fabric of the principal urban areas to meet housing demands. In some instances this has meant the loss of existing employment land (Kent and Medway Structure Plan).</p> <p>Sites and premises aimed at meeting the needs of SMEs are required (Area Investment Framework for West Kent, Sevenoaks Employment Land Review).</p> <p>The number of employees in the District is expected to increase to 51,153, an increase of 19% between 2006 and 2026 (0.9% per annum). This is focussed on retailing, hotels and catering (total 12,528 – up 2%), financial and business services (total 16,485 – up 63%) and public services (total 12,486 – up 17%). By comparison, there are losses in manufacturing, agriculture, and forestry.</p> <p>Premises and land currently in B class uses should remain allocated or designated for business uses, except those proposed for re-designation. (Employment Land Review).</p>
Need for new hotels to support tourism	There is increasing demand for hotel development due to: Growth in corporate demand; Growth from the contractors market; Increased levels of business generated by Brands Hatch from events and track days; More business generated through proactive leisure break marketing by hotels via the internet; and Strengthening demand in the budget hotel sector (Sevenoaks Hotel Futures 2007 Update).
<b>Social</b>	
Housing Need/Demand and Constraints on Development	<p>Average house prices in the District are higher than in all surrounding authorities in Kent, Surrey and Sussex. The total annual level of outstanding affordable need is 790 units (Sevenoaks Market and Needs Assessment).</p> <p>Many lower paid workers cannot afford to live in the District, causing problems in recruitment and retention for employers and commuting (causing congestion on roads).</p> <p>There are limited housing development sites within the District and, under current policies, few opportunities for affordable housing development. The high cost of land in the District makes it difficult for Housing Associations to acquire sites to deliver affordable housing (Sevenoaks Housing Strategy).</p>
Crime and anti-social behaviour	Reducing crime is a subject that is always high on the agenda, despite the comparatively low level of crime. Swanley and Sevenoaks suffer from the highest levels of crime. However, there are rises in crime in relatively rural areas including Brasted, Westerham and Farningham (Community Safety Partnership Strategy and Action Plan).
Access to services	<p>The need for better public transport options is a significant priority, particularly given the rural nature of the District, where limited public transport makes it difficult for groups such as the young, disabled and elderly and people without cars to access services (Sevenoaks Sustainable Community Action Plan).</p> <p>Rural areas can be remote &amp; lack services/facilities (Kent and Medway Structure Plan).</p> <p>There is a lack of facilities for children and young people such as open space (Sevenoaks Play Strategy).</p>
Lack of appropriate size housing	There are a large proportion of detached and semi-detached houses/bungalows in Sevenoaks District (66.6% of the stock). Flats and maisonettes represent only 12.3% of the stock, the majority of which are in the social rented sector. Small units, flats and terraced houses are under represented in the housing stock (Housing Market and Needs Assessment).

Ageing population	<p>A growing percentage of the population of the District is over 60 and increasingly reliant on the services of statutory and voluntary sector providers (Sustainable Community Action Plan).</p> <p>The significant growth in the number of people in the 65+ age group and in particular the 85+ age group may impact on demand for supported housing, support services and adaptations. There is a growing requirement for smaller accommodation for older person households (Housing Market and Needs Assessment).</p>
<b>Environmental</b>	
Climate Change and Resource Use	<p>Sevenoaks District is performing poorly in terms of total CO2 emissions per capita (10.4 tonnes in 2004 compared to 10.03 tonnes in Kent and 8.7 tonnes in the South East). Per capita consumption of water is also significantly above the national average (Baseline Review).</p> <p>On flood risk, the Environment Agency's efforts have led to more houses being protected to a better standard, though the Agency is still faced with a considerable number of planning applications every year in flood risk areas (Kent Environment Strategy Progress Report 2007). Flooding is a particular issue in Edenbridge and areas of Sevenoaks town.</p>
Poor air quality	<p>There are currently 10 AQMAs in Sevenoaks District, 3 of which were extended in December 2007. The next AQMA review is due in 2009.</p> <p>The principal cause of poor air quality in Sevenoaks District is the large volume of road traffic including a very high proportion of heavy goods vehicles passing through the area on the motorways to and from the Channel ports and tunnel. The Council has no control over the traffic on major trunk routes such as the M25 and relies on the Government and the Highways Agency to introduce National Strategies and local measures to reduce the air pollution affecting the area (Air Quality Action Plan).</p> <p>Access to a car/van in the household in Sevenoaks District is significantly above the average England levels and also higher than the South East on average. (Sevenoaks District Transport Study).</p>
Landscape deterioration	<p>In some areas of Sevenoaks the condition of the landscape has deteriorated or is considered to be at risk. Pressure for new development is the most obvious challenge to existing landscape character. Another problem is the growth of unremarkable development which has no local distinction or relevance to the local settlement pattern. Modern agricultural buildings can also detract from landscape since most are large scale and have no local distinction. Other potentially damaging activities include the growth in horsiculture, the supplementation / replacement of hedgerows with post and wire fencing and recreation (Sevenoaks DC Character Assessment).</p> <p>The AONB landscape is under intense commercial and development pressure (Kent Downs AONB Landscape Design Handbook).</p>
High rates of landfilling and low level of recycling	<p>For 06/07 the overall recycling/composting rate was 32.74%. 615Kg of waste was disposed of per household. This represented a 6% reduction on the previous year's figures. 261 Kg was disposed of per head of population. This also represented a 6% reduction on the previous year (2007 Annual Progress Report for the Community Plan).</p>
Decline in biodiversity and water quality	<p>Indicator on % of SSSIs in favourable condition is declining and classified as needing action (Baseline Review, Appendix 1).</p> <p>Population of wild birds in the South East is lower than 10 years ago and below the national average (Kent Environment Strategy Progress Report 2007).</p> <p>The Environment Agency say that almost a third of Kent's rivers fail to meet their non-statutory quality objectives (Kent Environment Strategy Progress Report 2007).</p>

Table 2.2: Sustainability objectives identified for the purposes of the ADMP SA process

The SA Framework	
1	Help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
2	Reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment
3	Improve the health and well-being of the population and reduce inequalities in health
4	Reduce poverty and social exclusion and close the gap between the most deprived areas and the rest
5	Improve accessibility for everyone to all services, facilities, recreational opportunities and employment
6	Reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve
7	Conserve and enhance biodiversity and geodiversity
8	Protect, enhance and make accessible for enjoyment, the countryside and the historic environment
9	Reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure
10	Create a high quality built environment
11	Promote sustainable forms of development and sustainable use of natural resources
12	Encourage high and stable levels of employment and sustain economic competitiveness
13	Improve the development and retention of skills



### 3 WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

#### 3.1 Introduction

3.1.1 The ADMP plan-making / SA process has been ongoing since 2010, as explained within Chapter 6 (*What has the Plan-Making Process Involved up to this Point?*) of the SA Report published / submitted alongside the draft ADMP. However, at the current time there is no need to recap that entire story, as the focus of plan-making is in fact a focus on 'modification-making' in relation to one specific policy issue - Fort Halstead.

3.1.2 The aim of this chapter is to explain the reasoning behind the selection of the alternative policy approaches ('alternatives') that are a focus of appraisal at the current time (i.e. those alternatives for which an appraisal is presented in Chapter 4 of this report). The SEA Regulations are clear that this information should be presented alongside alternatives appraisal findings.<sup>7</sup> There is essentially a need to explain the 'reasonableness' of the approach taken to alternatives appraisal.<sup>8</sup>

#### 3.2 Background to the consideration of alternatives for Fort Halstead

3.2.1 Fort Halstead is a developed site within the Green Belt and the Kent Downs AONB that was originally a Ministry of Defence research establishment and is still occupied by defence related industries. It remains a major employer in the District.

3.2.2 Proposals for a major residential-led mixed use redevelopment of the site were considered and rejected through the Core Strategy process. However the Core Strategy recognises that the current occupiers of Fort Halstead - QinetiQ and the Defence Science and Technology Laboratory (DSTL) - may vary during the Plan period, and that the implications of any decline in occupancy of the site should be considered (within the policy framework of the Core Strategy and relevant national planning policy) as and when this situation arises.

3.2.3 Subsequent to the adoption of the Core Strategy, DSTL, the largest employer, announced its intention to withdraw from the site by 2017/18. In light of this, the Council recognised the need to work with the owners and other interested parties to develop a policy for the future use and redevelopment of the site. The Green Belt status of the site constrains the scale of development that can acceptably be accommodated, while its AONB status provides a further constraint on future development. However, there is substantial development on the site at present which gives rise to the potential for sensitive redevelopment.

3.2.4 Policy EMP3 (Redevelopment of Fort Halstead) of the submitted ADMP is focused on ensuring provision of a range of employment uses at the site, with the supporting text referencing the aspiration to provide for approximately the 1200 jobs that are set to be lost due to withdrawal of DSTL. The policy also refers to "*widen[ing] the mix of uses on site, such as including an element of residential development and a hotel*".

3.2.5 However, there is no advice regarding what the Council would consider to be 'an element' in relation to residential development. This is a concern of the Inspector charged with Examining the ADMP (as explained within his note of April 2014). The Inspector's concerns reflect representations made by CBRE on behalf of the land owners - Armstrong (Kent) LLP - who suggest that the policy is re-written to provide detailed housing figures.<sup>9</sup>

<sup>7</sup> Schedule 2h establishes a requirement to present 'an outline of the reasons for selecting the alternatives dealt with'

<sup>8</sup> Article 5(1) states that 'reasonable alternatives' should be the focus of appraisal.

<sup>9</sup> CBREs submitted Examination Statement and appendices are available under 'Matter 6' at:

<http://www.sevenoaks.gov.uk/services/housing/planning/planning-policy-and-the-local-development-framework/allocations-and-development-management-plan/admp-examination/examination-library-and-statements/statements>

**3.3 Identifying reasonable alternatives**

3.3.1 At the current time the evidence-base points to there being two reasonable alternatives for Fort Halstead:

- **Option 1** – Submitted policy EMP3, but with the reference to ‘an element of residential’ replaced by a reference to **450 dwellings**.
  - For the purposes of appraisal, it is assumed that a scheme would be brought forward broadly in-line with that proposed at the current time by CBRE.<sup>10</sup> Many elements of the proposed scheme are demonstrably deliverable, although some are less so (and hence the appraisal must reflect a degree of uncertainty). For example, there is a degree of uncertainty around improved bus services to rail stations, improvements to transport infrastructure and ecological / landscape enhancement measures.
- **Option 2** – Submitted policy EMP3, but with the reference to ‘an element of residential’ replaced by a reference to **900 dwellings**.
  - For the purposes of appraisal, it is assumed that there would be higher density housing so that the housing ‘land-take’ is the same as under Option 1; and that other elements of the scheme would be *broadly* as per the current CBRE proposals, with some elements amplified (e.g. better funded community infrastructure) and others constrained (e.g. less space for gardens, car parking and green infrastructure).
  - N.B. The ‘900 dwellings’ figure reflects the fact that a previous proposed scheme (see discussion below) had envisaged delivery of 750 – 1000 homes at the site. 900 homes is assumed to be suitably indicative of a ‘higher housing growth’ approach.

3.3.2 The following discussion considers other options that have been given consideration, but need not be a focus of detailed appraisal at the current time (i.e. can be ‘screened-out’) on the basis that they fail the ‘reasonableness’ test.

What about other mixed-use schemes that have been promoted for the site over the years?

3.3.3 In 2010, at a time when the Core Strategy was being prepared, a scheme was proposed that would involve 700 - 1,000 dwellings, a large (60,000 m<sup>2</sup>) office development, leisure and community uses (e.g. a school), a residential institution (e.g. care home), a hotel, and a local centre (incorporating approximately 4,000m<sup>2</sup> retail and a health centre). This scheme is now understood to be non-deliverable, primarily on the basis that there is insufficient market demand to support a large office development.<sup>11</sup> The evidence-base in relation to employment opportunities on the site is summarised within the ‘Employment Land Summary’ report submitted to the ADMP Examination by CBRE, as an Appendix to their main statement.

What about ‘employment focused’ options (i.e. something akin to submitted Policy EMP3)?

3.3.4 Redevelopment with a view to maintaining or enhancing the employment role of Fort Halstead, without the delivery of a large quantum of housing, is an option that does have merit, not least in terms of AONB considerations. Whilst the Inspector charged with examining the ADMP is of the view that a mixed scheme would not lead to significant adverse effects to the integrity of the AONB<sup>12</sup>, there is nonetheless a degree of risk. This is reflected in the Kent Downs AONB Executive’s support for an ‘employment focused’ option. The AONB Executive state:<sup>13</sup>

<sup>10</sup> CBRE’s proposed scheme is outline within the submitted Examination Statement: [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0009/128619/HDR-Armstrong-Kent-LLP-CBRE-06-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0009/128619/HDR-Armstrong-Kent-LLP-CBRE-06-Matter-6.pdf). Further details of the proposed scheme are presented within the ‘Draft Development Framework’ document: [http://documents.sevenoaks.gov.uk/environment%20and%20planning/planning/planning%20policy/allocations%20and%20development/ADMP%20Examination%20Library/HDR%20Armstrong%20Kent%20LLP%20\(CBRE\)%2013%20%20Matter%206.pdf](http://documents.sevenoaks.gov.uk/environment%20and%20planning/planning/planning%20policy/allocations%20and%20development/ADMP%20Examination%20Library/HDR%20Armstrong%20Kent%20LLP%20(CBRE)%2013%20%20Matter%206.pdf)

<sup>11</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf)

<sup>12</sup> The Inspector’s note of 14th April states: “I consider that the Council’s objectives [for Fort Halstead] cannot be successfully achieved without some level of residential development.”

<sup>13</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0011/128738/HDR-Kent-Downs-AONB-05-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0011/128738/HDR-Kent-Downs-AONB-05-Matter-6.pdf)

*“The ‘mix of uses’ proposed in Policy EMP3 is not necessarily contrary to AONB policy. However, a major scheme with residential development – the landowner is currently proposing 450 houses – is extremely unlikely to be able to meet the tests of paragraphs 113, 115 and 116 of the NPPF [which deal with nationally important landscapes]...*

*... [W]e consider that the environmental effects on the AONB of housing development here would be unacceptable, and would be of a different order from the impacts of employment development... The following list illustrates additional impacts: [at this point there is a discussion of impacts under the headings of ‘Hours of use’, ‘Surroundings’, ‘Screening’, ‘Wildlife’, ‘Light pollution’, and ‘Traffic & noise’].”*

3.3.5 The Kent Downs AONB Executive would also support a hotel as part of an employment focused redevelopment on the basis that it could be “well landscaped in a woodland setting.”

3.3.6 However, the available evidence suggests that an employment focused scheme would not be deliverable. In particular, ‘viability’ is a concern given current market demand, with the ‘Fort Halstead Viability Review’ concluding that:<sup>14</sup>

*“We find that an employment only scheme on the site is unlikely to be viable. It is also our view that **only up to** [23,200m<sup>2</sup>] of [office or industrial] uses on the site is required to cater for demand in the foreseeable future. In our opinion, residential uses are required to deliver a competitive return to the landowner. [emphasis added]*

3.3.7 Essentially, the Viability Review suggests that a large housing development is necessary to enable redevelopment given (i) the exceptionally large costs attached to putting in place the requisite infrastructure for Fort Halstead to be redeveloped and (ii) the relatively modest financial return from non-residential uses.

3.3.8 Having said this, it is important to point out that non-viability of an ‘employment only’ redevelopment is not a conclusion that is supported unanimously. In particular, the Kent Downs AONB Executive has questioned this conclusion (as have CPRE Protect Kent).<sup>15</sup> It is certainly the case that a change in market demand in the future could potentially improve the viability of an employment only redevelopment scheme. As stated by the SDC, in their submitted Examination Statement:<sup>16</sup>

*“The current timetable for DSTL relocating from the site would not see the site being available for redevelopment until 2018, which represents a delay in the timetable... Even at the current timetable there is time for changes in the market for business floorspace, which may lead to greater demand (and viability) at Fort Halstead and require/allow a lower quantum of alternative forms of development... The Council understands that the relocation of DSTL is dependent on a planning permission at Porton Down... This raises the possibility that DSTL’s relocation could be further delayed and that there is less urgency to decide on the planning strategy for the site at this stage and more opportunity for circumstances to change.”*

3.3.9 On the other hand, the scheme promoters would point out that delay in agreeing a scheme for Fort Halstead could potentially risk the loss of QinetiQ:<sup>17</sup>

*“To plan for and invest further in this site, QinetiQ require planning certainty with regards the future of the whole site... In order to plan for Dstl’s departure in 2018, QinetiQ requires [a] new consolidated facility to be fully operational prior to the security fence being removed by Dstl. On that basis, the formal planning application process would need to commence [soon]. It is therefore critical that Policy EMP3 provides a clear, positive planning framework for the site, so that an EIA application can proceed without delay on that basis.”*

<sup>14</sup> In September 2013, the Council and Armstrong Kent (through CBRE) agreed that it would be appropriate for a viability assessment of the landowner’s emerging proposals and other potential development scenarios to be carried out by Knight Frank. The public version of the viability assessment was then submitted to the examination library in mid-February 2014. See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf)

<sup>15</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0009/129708/HDR-Kent-Downs-AONB-07-Fort-Halstead-Viability-Review-Comments-Matter-6.doc.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0009/129708/HDR-Kent-Downs-AONB-07-Fort-Halstead-Viability-Review-Comments-Matter-6.doc.pdf)

<sup>16</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0003/128568/HDC-40-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0003/128568/HDC-40-Matter-6.pdf)

<sup>17</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0009/128619/HDR-Armstrong-Kent-LLP-CBRE-06-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0009/128619/HDR-Armstrong-Kent-LLP-CBRE-06-Matter-6.pdf)

3.3.10 The Inspector is of a view that ‘providing certainty to QinetiQ’ is a priority issue<sup>18</sup>, and as such it is possible to conclude that it would be ‘unreasonable’ to pursue a policy approach, through the ADMP, that seeks to maintain the employment role of Fort Halstead without enabling housing development.

*What about options that would involve less intensive uses of the site?*

3.3.11 The Kent Downs AONB Executive’s submission<sup>13</sup> to the Examination states that:

*“There are other potential uses of the Fort Halstead site which the AONB Executive would welcome. Woodland management and low-key leisure uses are obvious ones, though we suggested others [during the consultation on the proposed submission ADMP], and keep an open mind about the opportunities which businesses and organisations may spot.”*

3.3.12 However, it is the case that non-intervention would lead to the loss of Fort Halstead as an employment location. The existing buildings and on-site infrastructure are largely out dated, inefficient and in some instances obsolete, and would not meet the needs of modern businesses. Considerable investment is required to upgrade buildings and site infrastructure.

3.3.13 The loss of Fort Halstead as a major employment location could lead to an unbalance of housing and employment locally (with implications for the achievement of a number of sustainability objectives, e.g. around commuting by car). This is reflected in Policy SP8 (Economic Development and Land for Business) of the adopted Core Strategy, which seeks to retain employment land and encourages intensification and regeneration of existing sites where necessary. The policy was prepared in-light of a ‘Long Term Employment Space Projections’ study (URS, 2011), which identified that employment land supply and demands are broadly in balance over the Core Strategy period (to 2026).<sup>19</sup>

3.3.14 Numerous studies<sup>11</sup> have been undertaken to explore options for employment at Fort Halstead, but no study has looked at the economic implications of the ‘no employment land’ option. It is fair to say, therefore, that the implications of loss of employment at Fort Halstead are at best highly uncertain, and a precautionary approach is warranted. The following quote by ‘Locate in Kent’<sup>20</sup> helps to illustrate this point:

*“Every site is unique, but Fort Halstead is particularly so in terms of the potential employment use of the site, not only because of its previous uses but because of its position right on the edge of Kent and adjacent to two London Boroughs with their main employment locations: Croydon, Bromley and Orpington. This makes it even harder to use available employment and property data to predict what demand might be for employment uses of different types. In addition of course, the recession makes it even harder to judge what may be possible over the medium term.”*

<sup>18</sup> The Inspector’s note of 14th April states: “I am aware that one of the current occupiers on the site who the Council is keen to retain in the District (QinetiQ), has indicated that it requires a greater level of certainty with regards to the future of the area and I consider that the approach that I am advocating would provide the necessary re-assurance.”

<sup>19</sup> See <http://www.sevenoaks.gov.uk/services/housing/planning/planning-policy-and-the-local-development-framework/evidence-base-and-topic-papers>

<sup>20</sup> Locate Kent is “Kent and Medway’s investment promotion agency. A private company set up in 1997, it has assisted 750 companies to relocate to, start up in or expand in Kent.” This quote is presented as part of the ‘Employment Land Summary’ report submitted to the ADMP Examination by CBRE, as an Appendix to their main statement. See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf)

**4 WHAT ARE THE SA FINDINGS AT THIS STAGE?**

**4.1 Introduction**

4.1.1 The aim of this Chapter is to present appraisal findings in relation to the alternative policy approaches (to Fort Halstead) introduced in Chapter 3.

**4.2 Methodology**

Overview

4.2.1 For each of the options, the assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability issues / objectives identified through scoping (see Chapter 2) as a methodological framework.

4.2.2 Shading is used to identify / evaluate effects as follows:

	'Significant' positive effect
	Positive effect
	No effect
	Uncertain effects
	Negative effect
	'Significant' negative effect

4.2.3 Effects are predicted taking into account the criteria presented within Regulations.<sup>21</sup> So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the assessment as appropriate. The potential for 'cumulative' effects (e.g. the effect of a particular approach to Fort Halstead being implemented alongside the rest of the ADMP) is also a consideration.

4.2.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the options. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no intervention' scenario). In light of this, there is a need to make considerable assumptions regarding how the options would be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

Ranking

4.2.5 In many instances, given reasonable assumptions, it is not possible differentiate between the options using the system presented above, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference.

Baseline

4.2.6 It is important to be clear about the 'baseline' against which the effects of the options are appraised. Whilst Fort Halsted currently functions as a major employment site, it is likely that its role and importance as an employment site would decline over time if it were the case that there is no intervention through the ADMP. Further discussion of the baseline situation is included within the appraisal table as necessary.

<sup>21</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

## Assumed adherence to EMP3 criteria

- 4.2.7 As discussed above, as part of the appraisal there is a need to make numerous assumptions in relation to how each option would be implemented. An overarching assumption is that development would be in-line with established policy, including the criteria listed within EMP3 as submitted. Whilst not adopted, the Inspector has indicated that these criteria are broadly sound. It can similarly be assumed that other policies within the submitted ADMP, and the Landscape policy<sup>22</sup> developed subsequent to agreement at the Examination hearings, are sound.


## 4.3 Appraisal findings

- 4.3.1 **Table 4.1** presents appraisal findings. The table ranks the options in terms of each of the sustainability objectives and uses **red** / **green** to indicate 'significant' effects where appropriate.

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<sup>22</sup> New Policy EN5: Landscape. 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 would conserve and enhance the character of the landscape and have regard to the relevant Management Plan and associated guidance. Proposals that affect the landscape throughout the District will be permitted where they would a) conserve the character of the landscape, including areas of tranquillity, and b) where feasible help secure enhancements in accordance with landscape actions in accordance with the Sevenoaks Countryside Assessment SPD.

Table 4.1: Appraisal of alternative approaches to Fort Halstead

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
1) To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	2	1 	<p>Either approach would involve increasing the supply of land allocated for housing in Sevenoaks over and above the baseline situation – i.e. a situation whereby land is allocated to meet the Core Strategy target of delivering 3,300 dwellings over the period 2006 – 2026 (165 dwellings per annum). Sevenoaks has over-delivered in recent years against the Core Strategy target – i.e. has delivered more than 165 dwellings per annum – but this trend is not set to continue in the long-term, according to analysis presented within the ‘Housing Benefits’ study submitted to the ADMP Examination by CBRE on behalf of the site owners.<sup>23</sup> Whilst Sevenoaks has sufficient housing supply to continue with its current rate of over-delivery in the next five years, the available supply is set to drop off from 2018 onwards. It may, therefore, be that the baseline situation in the future is one whereby there is undersupply of housing, relative to housing need. Understanding of housing need will be clarified in the near future, through a Strategic Housing Market Assessment (SHMA), which will consider how Sevenoaks should contribute to addressing housing need arising not just within its boundaries, but also within the wider housing market area. Housing need is understood to be high across much of the region, and not least the area in close proximity to London.</p> <p>In light of these considerations, it is possible to conclude that either option would lead to <b>significant positive effects</b> in the long-term, i.e. in the latter part of the plan period when the baseline scenario could well involve an undersupply of land for housing.</p> <p><b>Option 2</b> performs best on the basis that policy support would be given to a scheme that delivers <u>more housing</u> on the land (i.e. housing at a higher density). A greater quantum of housing will also also increase the likelihood of a high <u>affordable housing</u> target being agreed for the site. The Viability Review found that “... it is possible to move the 13% proportion for new build homes upwards towards the 20% mark or higher, especially where the viability can be improved with greater overall number of dwellings. The proportion of affordable homes could be established at outline application stage, and the Council should await further detailed proposals to test these levels, given the variables around CSH Levels, s.106/CIL payments and [other specific costs].” Policy SP3 of the adopted Core Strategy requires 40% of the total number of units to be affordable (i.e. available at below market rates) in residential developments of 15 dwellings or more; however, the Council has consistently failed to achieve this target. In part this is due to the difficulties of securing affordable housing on smaller scale residential sites due to viability issues. Smaller scale sites have historically been a key feature of the Sevenoaks housing land supply in recent years.</p> <p>Further considerations are as follows: Firstly, a larger scheme (<b>Option 2</b>) should enable delivery of a suitable <u>housing mix</u>, i.e. delivery of both a significant volume of smaller one and two bed units plus larger scale units designed to retain working families in the area. Secondly, a ‘specific cost’ that could potentially be accommodated as part of a larger scheme (<b>Option 2</b>) would be a <u>residential institution</u> (e.g. care home). A residential institution was proposed as part of the 2010 scheme that involved 750-1000 dwellings. Having said this, the higher density of housing necessitated under Option 2 could preclude land being made available for a residential institution.</p>

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<sup>23</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0011/128774/HDR-Armstrong-Kent-LLP-CBRE-08-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0011/128774/HDR-Armstrong-Kent-LLP-CBRE-08-Matter-6.pdf)

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
2) To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	2	★ 1	<p>The site is located within <u>flood zone 1</u>, and hence is a good location to build homes, from a flood risk perspective. Significant positive effects are, however, unlikely. Whilst it would be the case, to some extent, that housing growth at Fort Halsted reduces the pressure for housing developments in locations with a higher flood risk, in practice flood risk is not a major issue in Sevenoaks. If there is a need to develop urban extensions in the future, then it is likely to be possible to do so whilst avoiding flood risk areas. <b>Option 2</b> is predicted to perform best, in-light of the above discussion. However, it could be suggested that a lower density scheme (<b>Option 1</b>) would increase the potential to design-in effective <u>Sustainable Drainage Systems (SuDS)</u> – as well as as include more green space within the site footprint, which would also support sustainable drainage – and hence minimise any risk of surface water flooding or increased flood risk for areas downstream. Any such effects would be fairly negligible.</p>
3) To improve the health and well-being of the population and reduce inequalities in health	2	★ 1	<p>Either scheme would likely enable a situation whereby there is <i>sufficient</i> potential for residents to lead healthy lifestyles (e.g. through access to high quality countryside, accessible local green space and play facilities for children) and access community services and facilities (e.g. a health centre); however, the site is less than ideal, given its relative isolation / limited accessibility by public transport to higher order services and facilities (see further discussion under Objective 5, below). The baseline situation could involve a spatial approach to growth that is preferable in terms of this objective (e.g. it may transpire in the future that housing need must be addressed through development of a ‘sustainable urban extension’), albeit there could be less growth overall, which in turn would have negative implications (given that access to suitable housing has a bearing on health).</p> <p><b>Option 1</b> would enable delivery of <u>local facilities</u> including a community centre, and there is also a notable commitment to management of nearby woodland and downland. There is the potential for a higher housing growth approach (<b>Option 2</b>) to deliver more, although there is some uncertainty. A 750 – 1000 home scheme proposed in the past (in 2010) did involve “a local centre incorporating approximately 4,000m<sup>2</sup> retail and a health centre”.</p> <p>Lower density housing (<b>Option 1</b>) could be preferable if it is the case that homes are developed to higher <u>space standards</u> (whilst retaining sufficient publicly accessible green infrastructure, and a good housing mix).</p> <p>In conclusion, it is suggested that effects are uncertain, but Option 2 is preferable on balance. Significant effects are unlikely.</p>
4) To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	★ 1	★ 1	<p>The baseline situation would likely involve the decline of Fort Halstead as an <u>employment</u> location, given DSTL are set to relocate and QinetiQ’s future presence on the site is based on the assumption that there will be new neighbours secured for the site. Given the nature of the existing buildings on the site, there would be very little potential to attract new ‘high value’ businesses. It is likely that the site would increasingly be occupied by lower value / transient businesses.</p> <p>Either option would secure the site’s future as an employment location, leading to benefits in terms of this objective given that the site is accessible from <u>relatively deprived locations</u>, including Swanley to the north.</p> <p>Benefits would be indirect, and are unlikely to be significant. Even under a baseline situation, the site would continue to provide employment opportunities (including those accessible to lower skilled workers) for a number of years.</p>



Objective	Alternatives		Discussion
	Opt 1	Opt 2	
5) To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	2	1	<p>Either scheme would likely enable a situation whereby there is <i>sufficient</i> potential for residents to access community services and facilities; however, the site is less than ideal, given its relative isolation / limited accessibility by public transport. The nearest towns offering a comprehensive range of facilities and services are Sevenoaks (8km) and Orpington (9km). There are also a number of villages close to the site: Knockholt Pound (local shop, pub and garden centre); Halstead (local primary school and publ); Otford (local shops, primary school and medical facilities); and Dunton Green / Riverhead (Tesco superstore).</p> <p><b>Option 1</b> would enable delivery of <u>local facilities</u> including a community centre. The Viability Review submitted, by the Council, to the ADMP Examination finds that: <i>“The number of residential units at 450 new dwellings... is not high enough to justify the scheme incorporating a local convenience shop, as it will struggle to be viable with a catchment population of circa 1,250 residents”</i>.<sup>24</sup> However, the site promoters disagree, suggesting that a convenience shop may be viable once the custom of employees is taken into account. The promoters state that there is the potential to design a village centre with sufficient flexibility to enable retailers to respond to demand.<sup>25</sup> The current Development Framework also proposes a range of recreational facilities, including a cricket pitch with pavilion and a network of green spaces/links. There is also an evidence-based expectation that a ‘country-house’ style hotel will be delivered that provides public leisure and recreation facilities (e.g. coffee shop and gym).</p> <p><b>Option 2</b> would likely deliver more, although the margins may be slim. The Viability Review states that: <i>“Where the number of dwellings increases to 750 - 1,000, there may be an opportunity for a local shop to be commercially viable... Depending on the facilities provided by QinetiQ, there may be demand for a catering outlet... The market demand for larger format retail is not considered to be attractive, given the isolated nature of the site...”</i> A 750 – 1000 home scheme proposed in 2010 did include “a local centre incorporating approximately 4,000m<sup>2</sup> retail and a health centre”. Option 2 could potentially enable development of a centre that complements the existing centres at nearby Halstead and Knockholt Pound, both ‘Service Villages (Group B)’ with a population of under 1,500 residents. The Council, when considering the 1,000 home scheme in 2010 did come to the conclusion that the scale of shops, services and community facilities is likely to be appropriate for a service village, and not compete unduly with other centres nearby.<sup>26</sup> Option 2 would also likely deliver a <u>primary school</u>, which is an important consideration. The Council has previously submitted a view that a scheme of more than 750 homes would support delivery of a primary school.<sup>26</sup></p> <p>In conclusion, it is suggested that effects are uncertain. Significant negative effects are unlikely on the basis that it will be possible to develop a community where issues around poor accessibility and isolation can be avoided, even for those without a car. <b>Option 2</b> performs best, but it is not suggested that there will be significant benefits as this far from an ideal location (and never will be an ideal location, given nil potential for further expansion). The baseline situation could well be preferable, particularly as it could possibly involve a ‘sustainable urban extension’ (SUE). An SUE would enable good accessibility; and the reduced costs associated with developing a greenfield site would enable more funds to be made available for community infrastructure.</p>

<sup>24</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf)

<sup>25</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0009/131787/HDC-53-SDC-and-AKLLP-SOCG-Fort-Halstead-14-03-14-Final.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0009/131787/HDC-53-SDC-and-AKLLP-SOCG-Fort-Halstead-14-03-14-Final.pdf)

<sup>26</sup> Statement of Common Ground entered into between SDA and the promoters of a 1,000 home scheme at the time of the Core Strategy Examination.

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
6) To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	2	★ 1	<p><u>Air quality</u> is unlikely to be an issue associated with development of Fort Halstead. Whilst the District Council has declared 11 Air Quality Management Areas (AQMAs), including two associated with busy roads passing through the Sevenoaks urban area, it is assumed that neither option would have a notable bearing.</p> <p>With regards to <u>greenhouse gas emissions resulting from private car use</u>, this is an important consideration; however, this is an issue more appropriately considered below, under Objective 9.</p> <p>An important issue to give consideration to here is the potential to support high standards of sustainable design and construction, and design-in low carbon energy infrastructure; and hence minimise <u>greenhouse gas emissions associated with the built environment</u>. Either option would involve relatively 'large scale' growth, and hence there would be good potential to take an ambitious approach, i.e. an approach that would not be financially viable as part of small developments. It is fair to assume that the baseline situation would involve development locally of few, if any, developments on this scale in the short-term; however, in the longer term there could be a need to explore sustainable urban extension (SUE) options. A SUE would likely have greater potential to incorporate low carbon measures, given the lower costs associated with greenfield development.</p> <p>The Viability Review considered the potential for a 450 home scheme to deliver housing at 'Level 5' of the Code for Sustainable Homes (CfSH) as well as an 'energy centre', which would provide a low carbon source of heat and power (possibly, given the availability of storage space, fuelled by biomass). The conclusion is that the viability of a scheme involving both CfSH Level 5 and an energy centre is at best marginal. The potential to achieve these measures would increase significantly under Option 2.<sup>27</sup> On this basis, it is predicted that <b>Option 2</b> would lead to <b>significant positive effects</b> on the baseline in relation to per capita greenhouse gas emissions from the built environment.</p>

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<sup>27</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf)

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
7) To conserve and enhance biodiversity and geodiversity	★ 1	2	<p>The site is located within an area (the North Downs escarpment) that includes important woodland and chalk downland habitats. There are valued habitats on the Fort Halstead site that will contribute to some extent to the wider 'ecological network'. There are areas of ancient woodland and unimproved chalk grassland, and buildings are set within large grassed areas and punctuated by mature trees / small tree groups (possibly remnants of the woodland that largely covered the site prior to the latter part of the 20<sup>th</sup> Century<sup>28</sup>). These patches of habitat within the built-up part of the site have benefited from the lack of intensive use, but are not subject to any formal ecology-related planning designations.</p> <p>A considerable amount of work has been done in order to demonstrate that development of a 450 home scheme (<b>Option 1</b>) could accommodate existing areas and features of biodiversity importance. This includes development of an 'Ecological Management Plan', which has been reviewed by Natural England and been found to be broadly acceptable (albeit Natural England emphasise the limited nature of their review). There are clear commitments to retaining and enhancing (through the adoption of an appropriate management regime) the most important features within the site, i.e. woodland and areas of species grassland. Efforts will also be made to maintain 'second tier' features. The illustrative masterplan has been carefully designed to retain as many of the existing trees as possible, incorporating them into the green infrastructure network. However, some commitments are perhaps more questionable, including the commitment to ensure (through a Green Infrastructure Plan) "no additional access will be provided to areas of ancient woodland/chalk grassland." The suggestion that it will be possible to... "support local Biodiversity Action Plan (BAP) targets, including those objectives set within the AONB Management Plan" requires further explanation.</p> <p>Kent County Council has reviewed the Ecological Management Plan, and finds that, overall: "the reports demonstrate a reasonably good understanding of the ecological value of the site, and the potential ecological constraints to its development." KCC note that measures are set to be in place to ensure effective conservation of protected species, but that: "The Ecological Management Plan presents less certainty in relation to the sensitive habitats on the site; in particular the increased potential for direct and indirect impacts to the ancient woodland." The review notes the lack of details around the ancient woodland's condition and sensitivity and concludes by requesting a larger vegetated 'buffer' between the built up area and the ancient woodland.</p> <p>The issue of an appropriate buffer is currently the subject of ongoing debate between specialists. On the basis of the KCC findings, however, it is possible to predict that <b>Option 2</b> would likely lead to <b>significant negative effects</b>. A higher density development could hinder the potential to develop an appropriate (30m) buffer, and there would be significantly greater recreational uses (etc.) of the woodland, leading to disturbance and possibly other forms of damage. On the assumption that it will be possible to amend the Ecological Management Plan to reflect KCCs concerns, <b>Option 1</b> is not predicted to result in significant negative effects. Negative effects are predicted, but this conclusion is reached with some uncertainty. There could be the potential for targeted enhancements that support biodiversity locally.</p>

<sup>28</sup> The Heritage Study explains that throughout the 19<sup>th</sup> century the site, including the location of the Fort, was wooded. The 1939 map shows that the land between the earthworks and boundary was only sparsely wooded, but the change of use to research and development brought with it the need for increased secrecy and the maps during the second half of the 20<sup>th</sup> century show considerable tree encroachment. See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0009/128637/HDR-Armstrong-Kent-LLP-CBRE-19-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0009/128637/HDR-Armstrong-Kent-LLP-CBRE-19-Matter-6.pdf)

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
<p>8a) To protect, enhance and make accessible for enjoyment, <b>the countryside</b> and the historic environment</p> <p>[N.B. The discussion here relates to 'the countryside'. The historic environment is considered separately in the following row.]</p>	1	2	<p>Kent Downs AONB Executive does not support either option; however, the Inspector charged with examining the ADMP suggests (in his note of April 13<sup>th</sup>) that a mixed use scheme can be brought forward (sympathetically, in-line with policy) without significant impacts to the integrity of the AONB.<sup>29</sup> It is also the case that the Council has, in the past, tentatively come to the conclusion that there is no potential for significant visual impacts to the AONB to result from a redevelopment scheme.<sup>29</sup></p> <p>Through their representations to the Examination, the AONB Executive seeks to demonstrate that, whilst an employment focused redevelopment (including with a hotel) would be appropriate, allowing for a mixed use development would be contrary to the NPPF. They draw attention to the fact that <i>"Although this is a brownfield site the NPPF policies relating to the AONB for major development within the AONB still apply."</i> In other words, there is a need to give 'great weight' to conserving landscape and scenic beauty.<sup>30</sup> With regards to a 450 home scheme (<b>Option 1</b>) the AONB Executive predicts impacts to the AONB resulting from: hours of use, surroundings (on the basis that uses, e.g. bus stops, can 'spill-out' of the site), visual impact (e.g. given that residents can damage screening vegetation), wildlife, light pollution, and traffic (in particular, given use of the Star Hill site entrance). It is fair to assume that the AONB Executive would predict more severe impacts to result from <b>Option 2</b>.</p> <p>The AONB Executive's concerns had been raised previously (as part of the consultation on the Pre-submission Plan) and hence CBRE, on behalf of the site promoter, was able to respond to them at the time of the Examination through submission of an 'AONB Report'.<sup>31</sup> The AONB Report is supported by a Landscape and Visual Appraisal.<sup>32</sup> The purpose of the AONB Report is to <i>"demonstrate that [a 450 home scheme] will have no greater impact on the AONB than the existing use; that residential uses can be accommodated on the Site without causing adverse effects; and that a programme of landscape management and access improvements will bring about overall enhancements to the AONB."</i> The AONB Report considers the merits of a 450 home scheme (<b>Option 1</b>) under a 'framework' of headings developed to reflect national guidance. Under each heading, the report finds the likelihood of benefits for the AONB. The conclusion is reached that: <i>"The Proposed Redevelopment will enhance natural heritage features, ensuring the sensitive management of the woodland, mature trees and areas of chalk, semi-improved and neutral grassland... [and] benefit the understanding and enjoyment of the AONB, and the social and economic wellbeing of communities within the AONB."</i> The following are some more detailed findings in relation to a 450 home scheme (<b>Option 1</b>):</p> <ul style="list-style-type: none"> <li>• On tranquillity - The Report draws on a Transport Assessment<sup>33</sup> and Lighting Statement<sup>34</sup> to inform a conclusion that: <i>"There will be no noticeable increase in traffic movements and an overall reduction in lighting levels"</i>. This conclusion is dependent on the implementation of masterplanning, design and construction measures, principles for which have been established.</li> </ul>

<sup>29</sup> A 2010 statement of common ground prepared for the Core Strategy Examination stated that: *"The Council accepts that a development, broadly of the scale and form tested by AK and illustrated in these photo montages, would, from the viewpoints submitted and agreed with the Council and their consultants, have no significant adverse effects on views, either during the day or night."*

<sup>30</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0011/128738/HDR-Kent-Downs-AONB-05-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0011/128738/HDR-Kent-Downs-AONB-05-Matter-6.pdf)

<sup>31</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0007/128626/HDR-Armstrong-Kent-LLP-CBRE-10-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0007/128626/HDR-Armstrong-Kent-LLP-CBRE-10-Matter-6.pdf)

<sup>32</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0005/128633/HDR-Armstrong-Kent-LLP-CBRE-15-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0005/128633/HDR-Armstrong-Kent-LLP-CBRE-15-Matter-6.pdf)


<sup>33</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0004/128632/HDR-Armstrong-Kent-LLP-CBRE-14-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0004/128632/HDR-Armstrong-Kent-LLP-CBRE-14-Matter-6.pdf)

<sup>34</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0011/128639/HDR-Armstrong-Kent-LLP-CBRE-21-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0011/128639/HDR-Armstrong-Kent-LLP-CBRE-21-Matter-6.pdf)

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
			<ul style="list-style-type: none"> <li>The findings of the Transport Assessment are considered in more detail, below.</li> <li>With regards to lighting, it is the case that: <i>“A lighting strategy has been prepared, setting out the principles for the lighting design to be provided as a part of the Proposed Redevelopment. The replacement of existing lighting equipment will provide an opportunity to install new more efficient equipment with greater control of unwanted light, and therefore reduce upwards light... A number of lighting installations will be removed, particularly those at the West Gate / Star Hill Road...”</i></li> <li>On visual impact - <i>“The Proposed Redevelopment will generally consist of 1 – 2.5 storey buildings, and will be visually contained by the surrounding woodland... [T]here are currently a number of tall buildings within the site which are visible above the tree-line. These will be demolished... thereby improving views into the AONB.”</i> Elsewhere, it is stated that: <i>“[D]evelopment of the Site within the perimeter vegetation would not result in significant visual intrusion... Indeed... GIS analysis has shown the potential visibility of the proposed development [relative] to that of the existing to be considerably reduced.”</i> <ul style="list-style-type: none"> <li>On remoteness and isolation – <i>“The site is already heavily developed and due to its location on the periphery of the AONB boundary is heavily influenced by major transport routes including...”</i></li> </ul> </li> <li>On understanding and enjoyment of the AONB – <i>“The redevelopment of the site from a high security military/defence research facility to a mixed use area will allow members of the public to access an area of the AONB that was previously private.”</i></li> </ul> <p>It is worthwhile giving further consideration to the findings of the Transport Assessment. With regards to a 450 home scheme (<b>Option 1</b>) the assessment finds that:</p> <ul style="list-style-type: none"> <li>There should not be any requirement to make major improvements to the offsite highway network (e.g. road widening), although there may be a need for a capacity upgrade at the A21 / A224 / M25 Junction 4 link roundabout in the longer term.</li> <li>Overall there will be slight increase in traffic movements along roads within the AONB and changes to the number of vehicle movements on some key routes:             <ul style="list-style-type: none"> <li>The main impact of the proposed development will be on the section of Star Hill between the site access and the A224 which lies within the AONB and could potentially become a popular ‘rat run’ to Bromley. It has been concluded that there is a low risk of this occurring. This conclusion is based upon an assessment of likely journey times using the alternative routes (which suggests that the more attractive route will be via the main site access, and the A224 and Old London Road to the A21) and by reviewing past use of the secondary site access at times that it is available. Star Hill currently carries around 3,300 vehicles per day with a peak hour flow of about 400. It is estimated that the proposed development would increase peak flows by around 60 vehicles during the PM peak hour. The likely increase in traffic flow even at peak times is therefore about 1 vehicle per minute, which would not be a noticeable increase in traffic movements.</li> <li>Also, Sundridge Road (between Star Hill Roundabout and A25) is expected to have an additional 41 trips during the AM peak and 46 trips during the PM peak. Whilst this link does lie within the AONB the maximum level of increase is less than 1 vehicle per minute, which would not be a noticeable increase in traffic movements.</li> </ul> </li> <li>It is likely that an improvement will be required at the <u>main site access junction</u> between Crows Drive / Otford Lane and the</li> </ul>


Objective	Alternatives		Discussion
	Opt 1	Opt 2	
			<p>A224. This may take the form of a traffic light controlled junction (which will enable pedestrian crossing). A minor junction improvement may also be required at the Star Hill Lane site access junction in order to improved visibility splays.</p> <ul style="list-style-type: none"> <li>• There is the potential for demand for parking at the nearby stations, including Knockholt, where capacity is limited. However, effects can be mitigated (e.g. through bus routes).</li> <li>• The scheme may also include new bus stops for the 402 Bromley to Tunbridge Wells service.</li> </ul> <p>In conclusion, with regards to landscape, the AONB Report makes an argument in support of a 450 home scheme (<b>Option 1</b>), that is, on the face of it, highly convincing. This is also the conclusion reached by landscape specialists (Chris Blandford Associates) commissioned by SDC to review the AONB Report. CBA conclude that: <i>“The Fort Halstead redevelopment proposals as reviewed do not appear to impact on the AONB, nor does it on the openness of the Green Belt.”</i> Indeed, the CBA Report goes as far as to concur with the finding of the AONB Report that there will be wide-ranging benefits to the AONB.<sup>35</sup></p> <p>The CBA review highlights some methodological deficiencies and evidence gaps (e.g. around photo montages), but concludes that these do not have a bearing on overall conclusions. One point to note is that the CBA review of the AONB Report did not explore in detail the assumptions inherent in the Transport Assessment, which in turn feed into the AONB Report (e.g. the assumption that the masterplan will reduce the attractiveness of using Star Hill).</p> <p>The AONB Executive, and others, may disagree with CBA on specific points, and will have a chance to respond to the AONB Report during the consultation on Main Modifications. The AONB Executive, and others, may also want to raise more detailed issues around the masterplan that may or may not be potential of strategic importance. For example, there is an issue around the hotel, with the AONB Executive’s submission to the ADMP Examination stating that: <i>“The current Fort Halstead Draft Development Framework... shows the hotel on a confined plot in the centre of the site overlooking the cricket pitch: that is not how we expect a hotel to be developed in the Kent Downs AONB.”</i> Until such time as the AONB Executive has had the opportunity to respond to the AONB Report, it is appropriate to conclude ‘uncertain’ effects in relation to <b>Option 1</b>.</p> <p>The CBA review also asks the question: What level of development would be acceptable? The answer provided by CBA is that: <i>“There may be indirect landscape and visual effects that could result from changing... the amount, massing and location of development types within the site, but the current wording of Policy EMP3 would enable effective planning control to be exercised due to reference to the Green Belt and AONB policies. Visibility and character of development would therefore not be substantially different regardless of the EMP3 policy wording with respect to the development mix.”</i> On this basis, it might be possible to predict that <b>Option 2</b> (i.e. a 900 home scheme) would be ‘OK’ in landscape terms. However, this conclusion is not clear. For the purposes of this current appraisal, it is appropriate to take a precautionary approach, and predict that higher density development would lead to a ‘step change’ in the nature of effects, given the sensitivities around building heights and impacts to the local highways network. As such, Option 2 is predicted to result in negative effects in terms of landscape.</p>

<sup>35</sup> The CBA report is currently in draft form, and is not publically available.

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
<p>8b) To protect, enhance and make accessible for enjoyment, the countryside and <b>the historic environment</b></p> <p>[N.B. The discussion here relates to 'the historic environment'. The countryside is considered separately in the row above.]</p>		<p>2</p>	<p>The site has played a significant role in British military history, initially as a fort and then as a national centre for research and development. Fort Halstead itself, and the buildings within, represent the key heritage assets. The vast majority of buildings beyond the fort are of a generic and functional built form with little or no architectural interest and varied historic interest (those associated with the development of the atomic bomb being of associative interest). The most important is Building Q14, a Grade II listed building of key historic interest and moderate architectural interest. Whilst non-designated buildings and assets (structures, infrastructure and layout) may not be of particular heritage value in their own right, they do form the context within which the designated assets are experienced. In general, the setting that extant heritage assets enjoy is of a built-up environment with infrastructure, set amongst trees and surrounded for the most part by a wooded context.</p> <p>According to the 'Built Heritage Statement' prepared on behalf of the scheme promoters, the following can be expected of a 450 home scheme (<b>Option 1</b>):<sup>36</sup></p> <ul style="list-style-type: none"> <li>• All key assets within the site – notably Fort Halstead – will be conserved (including through sympathetic uses that maintain its setting) and enhanced (with a focus on educational uses). Furthermore the bunkers associated with the facility – although not designated for their heritage value – will be retained and incorporated within an area of open space, providing a link to the more recent history of the site.</li> <li>• Building Q14 will be retained and incorporated in the development, indeed it will be located alongside the proposed historic interpretation centre, which will aid the understanding of heritage significance of the Site.</li> <li>• There are no ancient field boundaries or routeways within the site, and the change of use will not require modifications to local road network (which is associated with ancient field boundaries, droveways and sunken lanes).</li> </ul> <p>It is also the case that the Heritage Statement puts forward a detailed, and ultimately convincing argument. Importantly, English Heritage has “welcomed positive engagement, and encourage that the site is planned for positively.”<sup>37</sup> Either option would represent a positive approach relative to the baseline situation, which would be one whereby the perimeter fence would eventually come down, and so access to Fort Halstead would increase, but there would be no formal right of access and no measures in place for managing access.</p> <p>On this basis, it is possible to conclude that <b>Option 1</b> will result in <b>significant positive effects</b>. <b>Option 2</b>, on the other hand, would lead to uncertain effects on the basis that there could be a necessity for less than sympathetic development in the vicinity of the key heritage assets, and there would be a more radical change in character of the site overall.</p>

<sup>36</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0009/128637/HDR-Armstrong-Kent-LLP-CBRE-19-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0009/128637/HDR-Armstrong-Kent-LLP-CBRE-19-Matter-6.pdf)

<sup>37</sup> According to the Built Heritage Statement

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
9) To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	2	1 	<p>Fort Halstead is clearly not an ideal location from a perspective of wishing to discourage per capita distance driven by private car / encourage a modal shift to walking, cycling and public transport:</p> <ul style="list-style-type: none"> <li>• The site is relatively isolated, with the nearest town being Sevenoaks, eight kilometres to the south.</li> <li>• The site is well connected by road, with easy access to the National Motorway Network via the M25, junction 4.</li> <li>• Existing access by public transport is relatively poor, and there are inherent challenges associated with providing traditional, commercially viable public transport solutions in a rural environment.               <ul style="list-style-type: none"> <li>• DSTL currently run a private peak period shuttle bus between the site and Knockholt and Orpington Stations. There are three buses during the morning peak and three during the evening peak. This runs every weekday with an average of 98 passengers a day.</li> </ul> </li> <li>• The existing network of rural lanes and unsurfaced/unlit footpaths in the vicinity of the site creates challenges for the development of a pedestrian and cycle network. The local topography also means that cycling from Sevenoaks to the site would be a challenge. However, the cycle route to Knockholt Station, approximately a 4.5 kilometre ride, is <i>relatively</i> flat (with a change in elevation of ~75m) and there are existing advisory cycle lanes on the Old London Road.</li> </ul> <p>A Transport Strategy has been prepared for a 450 home scheme (<b>Option 1</b>). In-light of discussions with the local bus service providers and KCC, the Strategy finds that the preferred option is to promote a community bus service to link the site with at least one commuter station and to provide links to the Riverhead Tesco store and to Sevenoaks at off peak times. It is anticipated that an attractive service can be provided for around £160,000 per annum. It is suggested that this cost could be funded through S106 in the short term with its long term viability guaranteed through other means (e.g. a residential service agreement). It is suggested that there may also be an opportunity to secure the diversion of the 402 bus service in the longer term.</p> <p>Another consideration is the potential to access a train station (ideally by non-car means). The Transport Assessment suggests that a 450 home scheme would generate a demand for around 60 commuter trips per day by train up to London. It is suggested that these trips will be split between a number of stations in the area and so the impact on any one station will be small.</p> <p>Despite the measures proposed through the transport strategy, it seems likely that <b>Option 1</b> would lead to <b>significant negative effects</b> on the baseline (i.e. a situation whereby levels of employment at Fort Halstead decline over time and housing is focused primarily on areas with better accessibility to higher order towns). This conclusion takes into account the fact that a proportion of people living at Fort Halstead (a figure of 10% has been suggested) will also work on site. With regards to <b>Option 2</b> it is difficult to draw a conclusion. On one hand, Option 2 would involve more housing in a location that is inherently constrained, but on the other hand there would certainly be the potential to fund a higher quality bus service (over the long term) and possibly also fund other transport infrastructure (but not major infrastructure, e.g. a train station upgrade). It is noted that, in 2010 at the time of the Core Strategy Examination, SDC did submit a view that “a mixed use development of ~1000 homes would likely enable a modal share close to that achieved by an urban extension, albeit with longer journey lengths”.<sup>38</sup> Uncertain effects are predicted..</p>

<sup>38</sup> Statement of Common Ground entered into between SDA and the promoters of a 1,000 home scheme at the time of the Core Strategy Examination.



Objective	Alternatives		Discussion
	Opt 1	Opt 2	
10) To create a high quality built environment	★ 1	2	The baseline situation is one whereby Fort Halsted will become blighted by underused buildings, which will stifle any attempts to deliver a long term solution (bar conversion of the site for less intensive uses, e.g. around nature conservation and recreation). There would be the likelihood of lower value uses/transitory businesses making use of the buildings on site. This could lead to management issues and an inability to meet wider environmental objectives. On this basis, either option is predicted to result in <b>significant positive effects</b> . Option 1 is predicted to perform better, on the basis that lower density development will offer most opportunity to ensure a high quality built environment (particularly given that AONB constraints prevent tall buildings).
11) To promote sustainable forms of development and sustainable use of natural resources	2	★ 1	Most of the issues that might be considered under this topic have already been addressed above. One issue relates to ‘the need to maintain the soil resource’ locally, i.e. through avoiding development of greenfield sites, and in particular ‘best and most versatile’ agricultural land. Either option would involve making good use of a previously developed site. This is compared to a baseline situation whereby a future Strategic Housing Market Assessment (SHMA) could well prompt a Green Belt Review, and in turn the designation of greenfield land for housing in Sevenoaks. Either option would lead to <b>significant positive effects</b> , and Option 2 performs best. Another consideration relates to the potential for good waste management. A larger scheme could possibly result in funds being made available for community waste management infrastructure; however, it’s not possible to assume that this would be the case.

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
12) To encourage high and stable levels of employment and sustain economic competitiveness	★ 1	★ 1	<p>As has been discussed above, the baseline scenario would involve withdrawal of the remaining high value user (QinetiQ) and the existing built accommodation being used for generally lower value/transitory businesses. This would be to the detriment of the local economy, and hence either option would lead to <b>significant positive effects</b> on the basis that higher value employment uses on the site would be secured for the long term.</p> <p>Work undertaken in support of the proposed 450 home scheme (<b>Option 1</b>) suggests that, in addition to securing QinetiQ as a major employer, there is the potential for redevelopment to result in creation of “a new business community, which could provide a high quality setting for up-to 150 high value, small businesses”. Analysis suggests that the number of new jobs provided will more than make up for the loss of jobs associated with the relocation of DSTL.”<sup>39</sup></p> <p>It is unlikely to be the case that more employment floor-space / jobs could be secured on the site under <b>Option 2</b>, although this is not something that has been tested. It is likely that a lack of market demand would present a barrier to the achievement of more jobs on-site. The two most recent SDC Annual Monitoring Reports (AMRs) – for 2012 and 2013 – describe a trend of very low take up of B1 employment accommodation in Sevenoaks; and further evidence is provided by the URS Business Survey (2013), which found that only 7% of small businesses wanting new accommodation would consider a move to Fort Halstead (albeit this may still represent a substantial number of businesses).</p> <p>The two options are predicted to perform equally well, although it is recognised that there could be some benefits associated with Option 2. For example, there might be greater potential to fund employment redevelopment in advance of housing.</p>
13) To improve the development/retention of skills	★ 1	★ 1	<p>QinetiQ has indicated that, once the long-term future of the company on-site is secured, the opportunity will be taken to expand (by around 50 employees) and consolidate activities in one building. With the company’s local presence strengthened there could be motivation to fund an apprenticeship programme, or even possibly a small college-type facility. The wide-ranging nature of the QinetiQs activities means that the company could prove well suited to a role supporting skills development locally</p>

<sup>39</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf)

4.4 Appraisal summary

Table 4.2: A summary of the alternatives appraisal

Objective	Alternatives	
	Opt 1	Opt 2
1) To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	2	★1
2) To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	2	★1
3) To improve the health and well-being of the population and reduce inequalities in health	2	★1
4) To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	★1	★1
5) To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	2	★1
6) To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	2	★1
7) To conserve and enhance biodiversity and geodiversity	★1	2
8a) To protect, enhance and make accessible for enjoyment, <b>the countryside</b> and the historic environment	★1	2
8b) To protect, enhance and make accessible for enjoyment, the countryside and <b>the historic environment</b>	★1	2
9) To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	2	★1
10) To create a high quality built environment	★1	2
11) To promote sustainable forms of development and sustainable use of natural resources	2	★1
12) To encourage high and stable levels of employment and sustain economic competitiveness	★1	★1
13) To improve the development and retention of skills	★1	★1

In conclusion, **Option 1** performs best in terms of two key environmental objectives – i.e. those relating to ‘biodiversity’ and ‘countryside / heritage’. It is certainly the case that Option 2 might test the in-principle support that is currently shown to redevelopment by Natural England and English Heritage, and would further entrench the Kent Downs AONB Executive’s opposition. Option 1 would, however, likely lead to significant negative effects in terms of the objective to minimise per capita CO<sub>2</sub> emissions from transport. Effects can be mitigated, including through policy, but the potential to support modal shift away from car travel is almost certainly less than would be the case at an alternative location for strategic housing growth locally.

**Option 2** performs best in terms of two important and related objectives – those relating ‘health’ and ‘access to services/facilities’ – on the basis that there should be the potential to fund additional services/facilities as part of the development; however, there is some uncertainty in this respect. Option 2 also performs best in terms of the climate change mitigation related objectives, including on the basis that there would be the potential to support a better bus service and hence modal shift away from the car. It is also obviously the case that Option 2 performs best in terms of objectives relating to ‘housing’ and efficient use of natural resources ‘i.e. soils’. However, Option 2 performs poorly in terms of biodiversity and countryside / heritage objective, with significant negative effects predicted for biodiversity on the basis that concerns around potential impacts to ancient woodland would be more difficult to address.

**5 WHAT ARE THE NEXT STEPS**

5.1.1 In-light of the appraisal findings presented in this Interim SA Report, the Council will consider options for Fort Halstead before drafting a new policy approach (see Box 5.1) and publishing that for consultation as a Main Modification (to the ADMP as previously submitted).

*Box 5.1: Developing a policy for Fort Halstead*

The aim of this Interim SA Report is primarily to inform the choice between the two alternative approaches – i.e. the choice of whether to promote a 450 home scheme or a 900 home scheme. It is difficult to suggest policy approaches that might be put in place to mitigate / enhance effects, without knowing what the preferred option will be; however, it is possible to make some broad recommendations at this stage.

The primary consideration perhaps relates to how the second bullet point within submitted Policy EMP3 – “Provide accessibility to jobs, shops and services by public transport, cycling or walking, including proposals for onsite provision proportionate to the proposed development” – might be strengthened. The might be the potential to refer to a level of accessibility (e.g. in terms of bus frequency) that would be required.

Also, the fifth bullet point – “Protect and integrate the Scheduled Ancient Monument and listed buildings into the development with improved access and setting” – could be strengthened by a reference to a more specific ‘access’ related objective.

5.1.2 An SA Report<sup>40</sup> will be published alongside. The SA Report will be structured in a similar fashion, although the content will vary in that:

- there will be a lengthier ‘story’ to tell when answering the question ‘What has plan-making / SA involved up to this point?’, i.e. it will be possible to also present alternatives appraisal findings and explain the reasoning behind the preferred approach;
- answering the question ‘What are SA findings at this current stage?’ will involve presenting an appraisal of the proposed Main Modifications; and
- answering the question ‘What happens next?’ will involve explaining that the plan will be finalised (possibly to include further Examination hearings) and then adopted.

<sup>40</sup> The document published alongside Main Modifications might best be labelled an SA Report ‘Addendum’ on the basis that it sets out to inform consultation on Modifications only (as opposed to ‘the ADMP as modified’). The ADMP ‘SA Report’ was published for consultation alongside the ADMP in 2013.



# Sustainability Appraisal (SA) of the Sevenoaks Allocations and Development Management Plan



Interim SA Report  
(Draft version for Committee)  
June 2014

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	June 2014	Interim SA Report presented to the Council  (Draft version for consideration by Committee)	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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## 1 INTRODUCTION

### 1.1 Background

1.1.1 The Sevenoaks Allocations and Development Management Plan (ADMP) is at an advanced stage of preparation, having been submitted to Government for Examination in November 2013. The ADMP, once adopted, will establish policy for the development of key sites and also establish district wide development management policy.

1.1.2 Examination hearings were held in March 2014, overseen by a Government appointed Planning Inspector. Subsequent to the hearings, on 14<sup>th</sup> April, the Inspector issued a note<sup>1</sup> to the Council identifying the need for further work with regards to Policy EMP3 on Fort Halstead. The Inspector reached this conclusion in-light of *“consideration of the written submissions, the debate at the hearing session and the further written representations submitted post-hearing.”*

1.1.3 The Inspector’s note suggests that ‘further work’ should involve appraising the merits of alternative policy approaches for the site. The intention is that *“The Council, having drawn conclusions on these matters, should draft a ‘new’ policy to reflect in more detail its aspirations for the site. This would have to be published as a Main Modification [to the submitted plan].”*

### 1.2 This Interim SA Report

1.2.1 The ADMP is being developed alongside a process of **Sustainability Appraisal (SA)**, a legally required<sup>2</sup> process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.<sup>3</sup>

1.2.2 The aim of **this Interim SA Report** is essentially to present the appraisal of alternative policy approaches to Fort Halstead in a timely fashion, i.e. in time to inform development of a preferred approach for consultation (‘publication as a Main Modification’). An SA Report<sup>4</sup> will then be prepared and published alongside that presents: 1) the appraisal of alternatives; 2) the Council’s reasons for developing the preferred approach in-light of the assessment of alternatives; and 3) an appraisal of the preferred approach (i.e. the proposed Main Mods).

1.2.3 This Interim SA Report sets out to answer four questions:

1. What’s the scope of the SA?
  - i.e. what are the parameters of the appraisal. This question is answered in light of dedicated ‘scoping’ work that has been undertaken (and has included consultation).
2. What has Plan-making / SA involved up to this point?
  - i.e. what work fed into the identification of a ‘reasonable’ range of alternative policy approaches to Fort Halstead.
3. What are the SA findings at this stage?
  - i.e. in relation to the Fort Halstead alternatives.
4. What happens next?
  - i.e. explain that the Council will develop a preferred approach and then publish that as a proposed Main Modification etc.

<sup>1</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0005/136418/PA-020-Note-from-Inspector-re-Fort-Halstead-7-4-14.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0005/136418/PA-020-Note-from-Inspector-re-Fort-Halstead-7-4-14.pdf)

<sup>2</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

<sup>3</sup> Directive 2001/42/EC

<sup>4</sup> The document published alongside Main Modifications might best be labelled an SA Report ‘Addendum’ on the basis that it sets out to inform consultation on Modifications only (as opposed to ‘the ADMP as modified’).



**2 WHAT’S THE SCOPE OF THE SA?**

- 2.1.1 The scope of SA work, with respect to the ADMP, is introduced within the SA Report published (and then subsequently submitted) alongside the Draft ADPM.<sup>5</sup> Essentially, the scope is explained by presenting a list of sustainability issues and objectives that together can be drawn on as a methodological ‘framework’ for appraisal. The discussion within the SA Report explains that the scope was established following review of the sustainability ‘context’ and ‘baseline’, as well as consultation.
- 2.1.2 The issues and objectives presented within the 2013 SA Report remain appropriate, i.e. remain fit for purpose at the current time, given the need for appraisal work to focus on alternatives for Fort Halstead. They are listed below – see Tables 2.1 and 2.2.
- 2.1.3 The scope of SA work at the current time – i.e. that presented within Chapter 4 of this report – is also influenced by **evidence-gathering work that has been undertaken over recent years in relation to Fort Halstead**. The evidence-base relevant to an appraisal of alternative policy options for Fort Halstead is helpfully summarised within the representations submitted to the ADMP Examination under ‘Matter 6: Fort Halstead’.<sup>6</sup>

*Table 2.1: Key sustainability issues identified for the purposes of the ADMP SA process*

Issue	Discussion
<b>Economic</b>	
Pockets of deprivation in an otherwise affluent area	Swanley St Mary’s (24th most deprived of the 331 wards in Kent and in the top 10% nationally), Dunton Green (34th), Swanley White Oak (61st) and Leigh (74th) (Sevenoaks District Housing Strategy). An overall impression of affluence masks some pockets of urban and rural deprivation. Some wards in the District suffer from higher than average unemployment rates, higher levels of poverty, poor health, low educational and skill levels and higher than average rates of crime (Sustainable Community Action Plan).
Constraints on development - Green Belt, AONB etc	Much of West Kent including Sevenoaks is subject to longstanding restraint on development and settlement expansion as a result of Green Belt, AONB and other constraint policies (Kent and Medway Structure Plan, South East Plan). There is a tension between the need for affordable places for local people and key/essential workers to live and the high percentage of the District that is Green Belt land (Sustainable Community Action Plan).
High levels of out-commuting	There remains significant leakage of the skills base as a result of outward commuting, with up to two thirds of West Kent resident commuters working in high skilled occupations (Area Investment Framework for West Kent).
Traffic congestion	Increasing vehicle movements and traffic congestion on arterial routes and in town centres (Area Investment Framework for West Kent, Sevenoaks Transport Study). Congestion could increase in the North of the District due to Ebbsfleet International Station (Context Review, Integrated Kent Rail Franchise).
Poor public transport	Poor public transport in rural areas (Kent Local Transport Plan). There are major gaps in the current bus network to the north east of the District, as well as poor access to and from the villages between Sevenoaks Town and Chiddingstone (Sevenoaks Transport Study).
Lack of higher education provision and skills shortages.	The comparative lack of Higher Education provision in West Kent often results in young people leaving West Kent in order to pursue their higher education and subsequent careers (Area Investment Framework for West Kent).

<sup>5</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0005/109904/Sustainability-Appraisal-ADMP-Report-jan-2013-final-version.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0005/109904/Sustainability-Appraisal-ADMP-Report-jan-2013-final-version.pdf)

<sup>6</sup> See @ [/www.sevenoaks.gov.uk/services/housing/planning/planning-policy-and-the-local-development-framework/allocations-and-development-management-plan/admp-examination/examination-library-and-statements/statements](http://www.sevenoaks.gov.uk/services/housing/planning/planning-policy-and-the-local-development-framework/allocations-and-development-management-plan/admp-examination/examination-library-and-statements/statements)

Thames Gateway and Ashford Growth Areas	Threat of competition from Kent's Growth Areas (Kent Prospects). This could impact on retail, increase out commuting etc.
Employment land	<p>Constraints on greenfield development coupled with strong housing markets and land values have resulted in substantial reinvestment in the fabric of the principal urban areas to meet housing demands. In some instances this has meant the loss of existing employment land (Kent and Medway Structure Plan).</p> <p>Sites and premises aimed at meeting the needs of SMEs are required (Area Investment Framework for West Kent, Sevenoaks Employment Land Review).</p> <p>The number of employees in the District is expected to increase to 51,153, an increase of 19% between 2006 and 2026 (0.9% per annum). This is focussed on retailing, hotels and catering (total 12,528 – up 2%), financial and business services (total 16,485 – up 63%) and public services (total 12,486 – up 17%). By comparison, there are losses in manufacturing, agriculture, and forestry.</p> <p>Premises and land currently in B class uses should remain allocated or designated for business uses, except those proposed for re-designation. (Employment Land Review).</p>
Need for new hotels to support tourism	There is increasing demand for hotel development due to: Growth in corporate demand; Growth from the contractors market; Increased levels of business generated by Brands Hatch from events and track days; More business generated through proactive leisure break marketing by hotels via the internet; and Strengthening demand in the budget hotel sector (Sevenoaks Hotel Futures 2007 Update).
<b>Social</b>	
Housing Need/Demand and Constraints on Development	<p>Average house prices in the District are higher than in all surrounding authorities in Kent, Surrey and Sussex. The total annual level of outstanding affordable need is 790 units (Sevenoaks Market and Needs Assessment).</p> <p>Many lower paid workers cannot afford to live in the District, causing problems in recruitment and retention for employers and commuting (causing congestion on roads).</p> <p>There are limited housing development sites within the District and, under current policies, few opportunities for affordable housing development. The high cost of land in the District makes it difficult for Housing Associations to acquire sites to deliver affordable housing (Sevenoaks Housing Strategy).</p>
Crime and anti-social behaviour	Reducing crime is a subject that is always high on the agenda, despite the comparatively low level of crime. Swanley and Sevenoaks suffer from the highest levels of crime. However, there are rises in crime in relatively rural areas including Brasted, Westerham and Farningham (Community Safety Partnership Strategy and Action Plan).
Access to services	<p>The need for better public transport options is a significant priority, particularly given the rural nature of the District, where limited public transport makes it difficult for groups such as the young, disabled and elderly and people without cars to access services (Sevenoaks Sustainable Community Action Plan).</p> <p>Rural areas can be remote &amp; lack services/facilities (Kent and Medway Structure Plan).</p> <p>There is a lack of facilities for children and young people such as open space (Sevenoaks Play Strategy).</p>
Lack of appropriate size housing	There are a large proportion of detached and semi-detached houses/bungalows in Sevenoaks District (66.6% of the stock). Flats and maisonettes represent only 12.3% of the stock, the majority of which are in the social rented sector. Small units, flats and terraced houses are under represented in the housing stock (Housing Market and Needs Assessment).

Ageing population	<p>A growing percentage of the population of the District is over 60 and increasingly reliant on the services of statutory and voluntary sector providers (Sustainable Community Action Plan).</p> <p>The significant growth in the number of people in the 65+ age group and in particular the 85+ age group may impact on demand for supported housing, support services and adaptations. There is a growing requirement for smaller accommodation for older person households (Housing Market and Needs Assessment).</p>
<b>Environmental</b>	
Climate Change and Resource Use	<p>Sevenoaks District is performing poorly in terms of total CO2 emissions per capita (10.4 tonnes in 2004 compared to 10.03 tonnes in Kent and 8.7 tonnes in the South East). Per capita consumption of water is also significantly above the national average (Baseline Review).</p> <p>On flood risk, the Environment Agency's efforts have led to more houses being protected to a better standard, though the Agency is still faced with a considerable number of planning applications every year in flood risk areas (Kent Environment Strategy Progress Report 2007). Flooding is a particular issue in Edenbridge and areas of Sevenoaks town.</p>
Poor air quality	<p>There are currently 10 AQMAs in Sevenoaks District, 3 of which were extended in December 2007. The next AQMA review is due in 2009.</p> <p>The principal cause of poor air quality in Sevenoaks District is the large volume of road traffic including a very high proportion of heavy goods vehicles passing through the area on the motorways to and from the Channel ports and tunnel. The Council has no control over the traffic on major trunk routes such as the M25 and relies on the Government and the Highways Agency to introduce National Strategies and local measures to reduce the air pollution affecting the area (Air Quality Action Plan).</p> <p>Access to a car/van in the household in Sevenoaks District is significantly above the average England levels and also higher than the South East on average. (Sevenoaks District Transport Study).</p>
Landscape deterioration	<p>In some areas of Sevenoaks the condition of the landscape has deteriorated or is considered to be at risk. Pressure for new development is the most obvious challenge to existing landscape character. Another problem is the growth of unremarkable development which has no local distinction or relevance to the local settlement pattern. Modern agricultural buildings can also detract from landscape since most are large scale and have no local distinction. Other potentially damaging activities include the growth in horsiculture, the supplementation / replacement of hedgerows with post and wire fencing and recreation (Sevenoaks DC Character Assessment).</p> <p>The AONB landscape is under intense commercial and development pressure (Kent Downs AONB Landscape Design Handbook).</p>
High rates of landfilling and low level of recycling	<p>For 06/07 the overall recycling/composting rate was 32.74%. 615Kg of waste was disposed of per household. This represented a 6% reduction on the previous year's figures. 261 Kg was disposed of per head of population. This also represented a 6% reduction on the previous year (2007 Annual Progress Report for the Community Plan).</p>
Decline in biodiversity and water quality	<p>Indicator on % of SSSIs in favourable condition is declining and classified as needing action (Baseline Review, Appendix 1).</p> <p>Population of wild birds in the South East is lower than 10 years ago and below the national average (Kent Environment Strategy Progress Report 2007).</p> <p>The Environment Agency say that almost a third of Kent's rivers fail to meet their non-statutory quality objectives (Kent Environment Strategy Progress Report 2007).</p>

Table 2.2: Sustainability objectives identified for the purposes of the ADMP SA process

The SA Framework	
1	Help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
2	Reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment
3	Improve the health and well-being of the population and reduce inequalities in health
4	Reduce poverty and social exclusion and close the gap between the most deprived areas and the rest
5	Improve accessibility for everyone to all services, facilities, recreational opportunities and employment
6	Reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve
7	Conserve and enhance biodiversity and geodiversity
8	Protect, enhance and make accessible for enjoyment, the countryside and the historic environment
9	Reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure
10	Create a high quality built environment
11	Promote sustainable forms of development and sustainable use of natural resources
12	Encourage high and stable levels of employment and sustain economic competitiveness
13	Improve the development and retention of skills

### 3 WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

#### 3.1 Introduction

3.1.1 The ADMP plan-making / SA process has been ongoing since 2010, as explained within Chapter 6 (*What has the Plan-Making Process Involved up to this Point?*) of the SA Report published / submitted alongside the draft ADMP. However, at the current time there is no need to recap that entire story, as the focus of plan-making is in fact a focus on 'modification-making' in relation to one specific policy issue - Fort Halstead.

3.1.2 The aim of this chapter is to explain the reasoning behind the selection of the alternative policy approaches ('alternatives') that are a focus of appraisal at the current time (i.e. those alternatives for which an appraisal is presented in Chapter 4 of this report). The SEA Regulations are clear that this information should be presented alongside alternatives appraisal findings.<sup>7</sup> There is essentially a need to explain the 'reasonableness' of the approach taken to alternatives appraisal.<sup>8</sup>

#### 3.2 Background to the consideration of alternatives for Fort Halstead

3.2.1 Fort Halstead is a developed site within the Green Belt and the Kent Downs AONB that was originally a Ministry of Defence research establishment and is still occupied by defence related industries. It remains a major employer in the District.

3.2.2 Proposals for a major residential-led mixed use redevelopment of the site were considered and rejected through the Core Strategy process. However the Core Strategy recognises that the current occupiers of Fort Halstead - QinetiQ and the Defence Science and Technology Laboratory (DSTL) - may vary during the Plan period, and that the implications of any decline in occupancy of the site should be considered (within the policy framework of the Core Strategy and relevant national planning policy) as and when this situation arises.

3.2.3 Subsequent to the adoption of the Core Strategy, DSTL, the largest employer, announced its intention to withdraw from the site by 2017/18. In light of this, the Council recognised the need to work with the owners and other interested parties to develop a policy for the future use and redevelopment of the site. The Green Belt status of the site constrains the scale of development that can acceptably be accommodated, while its AONB status provides a further constraint on future development. However, there is substantial development on the site at present which gives rise to the potential for sensitive redevelopment.

3.2.4 Policy EMP3 (Redevelopment of Fort Halstead) of the submitted ADMP is focused on ensuring provision of a range of employment uses at the site, with the supporting text referencing the aspiration to provide for approximately the 1200 jobs that are set to be lost due to withdrawal of DSTL. The policy also refers to "*widen[ing] the mix of uses on site, such as including an element of residential development and a hotel*".

3.2.5 However, there is no advice regarding what the Council would consider to be 'an element' in relation to residential development. This is a concern of the Inspector charged with Examining the ADMP (as explained within his note of April 2014). The Inspector's concerns reflect representations made by CBRE on behalf of the land owners - Armstrong (Kent) LLP - who suggest that the policy is re-written to provide detailed housing figures.<sup>9</sup>

<sup>7</sup> Schedule 2h establishes a requirement to present 'an outline of the reasons for selecting the alternatives dealt with'

<sup>8</sup> Article 5(1) states that 'reasonable alternatives' should be the focus of appraisal.

<sup>9</sup> CBREs submitted Examination Statement and appendices are available under 'Matter 6' at:

<http://www.sevenoaks.gov.uk/services/housing/planning/planning-policy-and-the-local-development-framework/allocations-and-development-management-plan/admp-examination/examination-library-and-statements/statements>

### 3.3 Identifying reasonable alternatives

3.3.1 At the current time the evidence-base points to there being two reasonable alternatives for Fort Halstead:

- **Option 1** – Submitted policy EMP3, but with the reference to ‘an element of residential’ replaced by a reference to **450 dwellings**.
  - For the purposes of appraisal, it is assumed that a scheme would be brought forward broadly in-line with that proposed at the current time by CBRE.<sup>10</sup> Many elements of the proposed scheme are demonstrably deliverable, although some are less so (and hence the appraisal must reflect a degree of uncertainty). For example, there is a degree of uncertainty around improved bus services to rail stations, improvements to transport infrastructure and ecological / landscape enhancement measures.
- **Option 2** – Submitted policy EMP3, but with the reference to ‘an element of residential’ replaced by a reference to **900 dwellings**.
  - For the purposes of appraisal, it is assumed that there would be higher density housing so that the housing ‘land-take’ is the same as under Option 1; and that other elements of the scheme would be *broadly* as per the current CBRE proposals, with some elements amplified (e.g. better funded community infrastructure) and others constrained (e.g. less space for gardens, car parking and green infrastructure).
  - N.B. The ‘900 dwellings’ figure reflects the fact that a previous proposed scheme (see discussion below) had envisaged delivery of 750 – 1000 homes at the site. 900 homes is assumed to be suitably indicative of a ‘higher housing growth’ approach.

3.3.2 The following discussion considers other options that have been given consideration, but need not be a focus of detailed appraisal at the current time (i.e. can be ‘screened-out’) on the basis that they fail the ‘reasonableness’ test.

#### What about other mixed-use schemes that have been promoted for the site over the years?

3.3.3 In 2010, at a time when the Core Strategy was being prepared, a scheme was proposed that would involve 700 - 1,000 dwellings, a large (60,000 m<sup>2</sup>) office development, leisure and community uses (e.g. a school), a residential institution (e.g. care home), a hotel, and a local centre (incorporating approximately 4,000m<sup>2</sup> retail and a health centre). This scheme is now understood to be non-deliverable, primarily on the basis that there is insufficient market demand to support a large office development.<sup>11</sup> The evidence-base in relation to employment opportunities on the site is summarised within the ‘Employment Land Summary’ report submitted to the ADMP Examination by CBRE, as an Appendix to their main statement.

#### What about ‘employment focused’ options (i.e. something akin to submitted Policy EMP3)?

3.3.4 Redevelopment with a view to maintaining or enhancing the employment role of Fort Halstead, without the delivery of a large quantum of housing, is an option that does have merit, not least in terms of AONB considerations. Whilst the Inspector charged with examining the ADMP is of the view that a mixed scheme would not lead to significant adverse effects to the integrity of the AONB<sup>12</sup>, there is nonetheless a degree of risk. This is reflected in the Kent Downs AONB Executive’s support for an ‘employment focused’ option. The AONB Executive state:<sup>13</sup>

<sup>10</sup> CBRE’s proposed scheme is outline within the submitted Examination Statement: [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0009/128619/HDR-Armstrong-Kent-LLP-CBRE-06-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0009/128619/HDR-Armstrong-Kent-LLP-CBRE-06-Matter-6.pdf). Further details of the proposed scheme are presented within the ‘Draft Development Framework’ document: [http://documents.sevenoaks.gov.uk/environment%20and%20planning/planning/planning%20policy/allocations%20and%20development/ADMP%20Examination%20Library/HDR%20Armstrong%20Kent%20LLP%20\(CBRE\)%2013%20%20Matter%206.pdf](http://documents.sevenoaks.gov.uk/environment%20and%20planning/planning/planning%20policy/allocations%20and%20development/ADMP%20Examination%20Library/HDR%20Armstrong%20Kent%20LLP%20(CBRE)%2013%20%20Matter%206.pdf)

<sup>11</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf)

<sup>12</sup> The Inspector’s note of 14th April states: “I consider that the Council’s objectives [for Fort Halstead] cannot be successfully achieved without some level of residential development.”

<sup>13</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0011/128738/HDR-Kent-Downs-AONB-05-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0011/128738/HDR-Kent-Downs-AONB-05-Matter-6.pdf)

*“The ‘mix of uses’ proposed in Policy EMP3 is not necessarily contrary to AONB policy. However, a major scheme with residential development – the landowner is currently proposing 450 houses – is extremely unlikely to be able to meet the tests of paragraphs 113, 115 and 116 of the NPPF [which deal with nationally important landscapes]...*

*... [W]e consider that the environmental effects on the AONB of housing development here would be unacceptable, and would be of a different order from the impacts of employment development... The following list illustrates additional impacts: [at this point there is a discussion of impacts under the headings of ‘Hours of use’, ‘Surroundings’, ‘Screening’, ‘Wildlife’, ‘Light pollution’, and ‘Traffic & noise’].”*

3.3.5 The Kent Downs AONB Executive would also support a hotel as part of an employment focused redevelopment on the basis that it could be “well landscaped in a woodland setting.”

3.3.6 However, the available evidence suggests that an employment focused scheme would not be deliverable. In particular, ‘viability’ is a concern given current market demand, with the ‘Fort Halstead Viability Review’ concluding that:<sup>14</sup>

*“We find that an employment only scheme on the site is unlikely to be viable. It is also our view that **only up to** [23,200m<sup>2</sup>] of [office or industrial] uses on the site is required to cater for demand in the foreseeable future. In our opinion, residential uses are required to deliver a competitive return to the landowner. [emphasis added]*

3.3.7 Essentially, the Viability Review suggests that a large housing development is necessary to enable redevelopment given (i) the exceptionally large costs attached to putting in place the requisite infrastructure for Fort Halstead to be redeveloped and (ii) the relatively modest financial return from non-residential uses.

3.3.8 Having said this, it is important to point out that non-viability of an ‘employment only’ redevelopment is not a conclusion that is supported unanimously. In particular, the Kent Downs AONB Executive has questioned this conclusion (as have CPRE Protect Kent).<sup>15</sup> It is certainly the case that a change in market demand in the future could potentially improve the viability of an employment only redevelopment scheme. As stated by the SDC, in their submitted Examination Statement:<sup>16</sup>

*“The current timetable for DSTL relocating from the site would not see the site being available for redevelopment until 2018, which represents a delay in the timetable... Even at the current timetable there is time for changes in the market for business floorspace, which may lead to greater demand (and viability) at Fort Halstead and require/allow a lower quantum of alternative forms of development... The Council understands that the relocation of DSTL is dependent on a planning permission at Porton Down... This raises the possibility that DSTL’s relocation could be further delayed and that there is less urgency to decide on the planning strategy for the site at this stage and more opportunity for circumstances to change.”*

3.3.9 On the other hand, the scheme promoters would point out that delay in agreeing a scheme for Fort Halstead could potentially risk the loss of QinetiQ:<sup>17</sup>

*“To plan for and invest further in this site, QinetiQ require planning certainty with regards the future of the whole site... In order to plan for Dstl’s departure in 2018, QinetiQ requires [a] new consolidated facility to be fully operational prior to the security fence being removed by Dstl. On that basis, the formal planning application process would need to commence [soon]. It is therefore critical that Policy EMP3 provides a clear, positive planning framework for the site, so that an EIA application can proceed without delay on that basis.”*

<sup>14</sup> In September 2013, the Council and Armstrong Kent (through CBRE) agreed that it would be appropriate for a viability assessment of the landowner’s emerging proposals and other potential development scenarios to be carried out by Knight Frank. The public version of the viability assessment was then submitted to the examination library in mid-February 2014. See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf)

<sup>15</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0009/129708/HDR-Kent-Downs-AONB-07-Fort-Halstead-Viability-Review-Comments-Matter-6.doc.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0009/129708/HDR-Kent-Downs-AONB-07-Fort-Halstead-Viability-Review-Comments-Matter-6.doc.pdf)

<sup>16</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0003/128568/HDC-40-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0003/128568/HDC-40-Matter-6.pdf)

<sup>17</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0009/128619/HDR-Armstrong-Kent-LLP-CBRE-06-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0009/128619/HDR-Armstrong-Kent-LLP-CBRE-06-Matter-6.pdf)

3.3.10 The Inspector is of a view that ‘providing certainty to QinetiQ’ is a priority issue<sup>18</sup>, and as such it is possible to conclude that it would be ‘unreasonable’ to pursue a policy approach, through the ADMP, that seeks to maintain the employment role of Fort Halstead without enabling housing development.

*What about options that would involve less intensive uses of the site?*

3.3.11 The Kent Downs AONB Executive’s submission<sup>13</sup> to the Examination states that:

*“There are other potential uses of the Fort Halstead site which the AONB Executive would welcome. Woodland management and low-key leisure uses are obvious ones, though we suggested others [during the consultation on the proposed submission ADMP], and keep an open mind about the opportunities which businesses and organisations may spot.”*

3.3.12 However, it is the case that non-intervention would lead to the loss of Fort Halstead as an employment location. The existing buildings and on-site infrastructure are largely out dated, inefficient and in some instances obsolete, and would not meet the needs of modern businesses. Considerable investment is required to upgrade buildings and site infrastructure.

3.3.13 The loss of Fort Halstead as a major employment location could lead to an unbalance of housing and employment locally (with implications for the achievement of a number of sustainability objectives, e.g. around commuting by car). This is reflected in Policy SP8 (Economic Development and Land for Business) of the adopted Core Strategy, which seeks to retain employment land and encourages intensification and regeneration of existing sites where necessary. The policy was prepared in-light of a ‘Long Term Employment Space Projections’ study (URS, 2011), which identified that employment land supply and demands are broadly in balance over the Core Strategy period (to 2026).<sup>19</sup>

3.3.14 Numerous studies<sup>11</sup> have been undertaken to explore options for employment at Fort Halstead, but no study has looked at the economic implications of the ‘no employment land’ option. It is fair to say, therefore, that the implications of loss of employment at Fort Halstead are at best highly uncertain, and a precautionary approach is warranted. The following quote by ‘Locate in Kent’<sup>20</sup> helps to illustrate this point:

*“Every site is unique, but Fort Halstead is particularly so in terms of the potential employment use of the site, not only because of its previous uses but because of its position right on the edge of Kent and adjacent to two London Boroughs with their main employment locations: Croydon, Bromley and Orpington. This makes it even harder to use available employment and property data to predict what demand might be for employment uses of different types. In addition of course, the recession makes it even harder to judge what may be possible over the medium term.”*

<sup>18</sup> The Inspector’s note of 14th April states: “I am aware that one of the current occupiers on the site who the Council is keen to retain in the District (QinetiQ), has indicated that it requires a greater level of certainty with regards to the future of the area and I consider that the approach that I am advocating would provide the necessary re-assurance.”

<sup>19</sup> See <http://www.sevenoaks.gov.uk/services/housing/planning/planning-policy-and-the-local-development-framework/evidence-base-and-topic-papers>

<sup>20</sup> Locate Kent is “Kent and Medway’s investment promotion agency. A private company set up in 1997, it has assisted 750 companies to relocate to, start up in or expand in Kent.” This quote is presented as part of the ‘Employment Land Summary’ report submitted to the ADMP Examination by CBRE, as an Appendix to their main statement. See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf)



**4 WHAT ARE THE SA FINDINGS AT THIS STAGE?**

**4.1 Introduction**

4.1.1 The aim of this Chapter is to present appraisal findings in relation to the alternative policy approaches (to Fort Halstead) introduced in Chapter 3.

**4.2 Methodology**

Overview

4.2.1 For each of the options, the assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability issues / objectives identified through scoping (see Chapter 2) as a methodological framework.

4.2.2 Shading is used to identify / evaluate effects as follows:

	'Significant' positive effect
	Positive effect
	No effect
	Uncertain effects
	Negative effect
	'Significant' negative effect

4.2.3 Effects are predicted taking into account the criteria presented within Regulations.<sup>21</sup> So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the assessment as appropriate. The potential for 'cumulative' effects (e.g. the effect of a particular approach to Fort Halstead being implemented alongside the rest of the ADMP) is also a consideration.

4.2.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the options. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no intervention' scenario). In light of this, there is a need to make considerable assumptions regarding how the options would be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

Ranking

4.2.5 In many instances, given reasonable assumptions, it is not possible differentiate between the options using the system presented above, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference.

Baseline

4.2.6 It is important to be clear about the 'baseline' against which the effects of the options are appraised. Whilst Fort Halsted currently functions as a major employment site, it is likely that its role and importance as an employment site would decline over time if it were the case that there is no intervention through the ADMP. Further discussion of the baseline situation is included within the appraisal table as necessary.

<sup>21</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

## Assumed adherence to EMP3 criteria

- 4.2.7 As discussed above, as part of the appraisal there is a need to make numerous assumptions in relation to how each option would be implemented. An overarching assumption is that development would be in-line with established policy, including the criteria listed within EMP3 as submitted. Whilst not adopted, the Inspector has indicated that these criteria are broadly sound. It can similarly be assumed that other policies within the submitted ADMP, and the Landscape policy<sup>22</sup> developed subsequent to agreement at the Examination hearings, are sound.


## 4.3 Appraisal findings

- 4.3.1 **Table 4.1** presents appraisal findings. The table ranks the options in terms of each of the sustainability objectives and uses **red** / **green** to indicate 'significant' effects where appropriate.

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<sup>22</sup> New Policy EN5: Landscape. 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 would conserve and enhance the character of the landscape and have regard to the relevant Management Plan and associated guidance. Proposals that affect the landscape throughout the District will be permitted where they would a) conserve the character of the landscape, including areas of tranquillity, and b) where feasible help secure enhancements in accordance with landscape actions in accordance with the Sevenoaks Countryside Assessment SPD.

Table 4.1: Appraisal of alternative approaches to Fort Halstead

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
1) To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	2	1 	<p>Either approach would involve increasing the supply of land allocated for housing in Sevenoaks over and above the baseline situation – i.e. a situation whereby land is allocated to meet the Core Strategy target of delivering 3,300 dwellings over the period 2006 – 2026 (165 dwellings per annum). Sevenoaks has over-delivered in recent years against the Core Strategy target – i.e. has delivered more than 165 dwellings per annum – but this trend is not set to continue in the long-term, according to analysis presented within the ‘Housing Benefits’ study submitted to the ADMP Examination by CBRE on behalf of the site owners.<sup>23</sup> Whilst Sevenoaks has sufficient housing supply to continue with its current rate of over-delivery in the next five years, the available supply is set to drop off from 2018 onwards. It may, therefore, be that the baseline situation in the future is one whereby there is undersupply of housing, relative to housing need. Understanding of housing need will be clarified in the near future, through a Strategic Housing Market Assessment (SHMA), which will consider how Sevenoaks should contribute to addressing housing need arising not just within its boundaries, but also within the wider housing market area. Housing need is understood to be high across much of the region, and not least the area in close proximity to London.</p> <p>In light of these considerations, it is possible to conclude that either option would lead to <b>significant positive effects</b> in the long-term, i.e. in the latter part of the plan period when the baseline scenario could well involve an undersupply of land for housing.</p> <p><b>Option 2</b> performs best on the basis that policy support would be given to a scheme that delivers <u>more housing</u> on the land (i.e. housing at a higher density). A greater quantum of housing will also also increase the likelihood of a high <u>affordable housing</u> target being agreed for the site. The Viability Review found that “... it is possible to move the 13% proportion for new build homes upwards towards the 20% mark or higher, especially where the viability can be improved with greater overall number of dwellings. The proportion of affordable homes could be established at outline application stage, and the Council should await further detailed proposals to test these levels, given the variables around CSH Levels, s.106/CIL payments and [other specific costs].” Policy SP3 of the adopted Core Strategy requires 40% of the total number of units to be affordable (i.e. available at below market rates) in residential developments of 15 dwellings or more; however, the Council has consistently failed to achieve this target. In part this is due to the difficulties of securing affordable housing on smaller scale residential sites due to viability issues. Smaller scale sites have historically been a key feature of the Sevenoaks housing land supply in recent years.</p> <p>Further considerations are as follows: Firstly, a larger scheme (<b>Option 2</b>) should enable delivery of a suitable <u>housing mix</u>, i.e. delivery of both a significant volume of smaller one and two bed units plus larger scale units designed to retain working families in the area. Secondly, a ‘specific cost’ that could potentially be accommodated as part of a larger scheme (<b>Option 2</b>) would be a <u>residential institution</u> (e.g. care home). A residential institution was proposed as part of the 2010 scheme that involved 750-1000 dwellings. Having said this, the higher density of housing necessitated under Option 2 could preclude land being made available for a residential institution.</p>

<sup>23</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0011/128774/HDR-Armstrong-Kent-LLP-CBRE-08-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0011/128774/HDR-Armstrong-Kent-LLP-CBRE-08-Matter-6.pdf)

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
2) To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	2	★ 1	<p>The site is located within <u>flood zone 1</u>, and hence is a good location to build homes, from a flood risk perspective. Significant positive effects are, however, unlikely. Whilst it would be the case, to some extent, that housing growth at Fort Halsted reduces the pressure for housing developments in locations with a higher flood risk, in practice flood risk is not a major issue in Sevenoaks. If there is a need to develop urban extensions in the future, then it is likely to be possible to do so whilst avoiding flood risk areas. <b>Option 2</b> is predicted to perform best, in-light of the above discussion. However, it could be suggested that a lower density scheme (<b>Option 1</b>) would increase the potential to design-in effective <u>Sustainable Drainage Systems (SuDS)</u> – as well as as include more green space within the site footprint, which would also support sustainable drainage – and hence minimise any risk of surface water flooding or increased flood risk for areas downstream. Any such effects would be fairly negligible.</p>
3) To improve the health and well-being of the population and reduce inequalities in health	2	★ 1	<p>Either scheme would likely enable a situation whereby there is <i>sufficient</i> potential for residents to lead healthy lifestyles (e.g. through access to high quality countryside, accessible local green space and play facilities for children) and access community services and facilities (e.g. a health centre); however, the site is less than ideal, given its relative isolation / limited accessibility by public transport to higher order services and facilities (see further discussion under Objective 5, below). The baseline situation could involve a spatial approach to growth that is preferable in terms of this objective (e.g. it may transpire in the future that housing need must be addressed through development of a ‘sustainable urban extension’), albeit there could be less growth overall, which in turn would have negative implications (given that access to suitable housing has a bearing on health).</p> <p><b>Option 1</b> would enable delivery of <u>local facilities</u> including a community centre, and there is also a notable commitment to management of nearby woodland and downland. There is the potential for a higher housing growth approach (<b>Option 2</b>) to deliver more, although there is some uncertainty. A 750 – 1000 home scheme proposed in the past (in 2010) did involve “a local centre incorporating approximately 4,000m<sup>2</sup> retail and a health centre”.</p> <p>Lower density housing (<b>Option 1</b>) could be preferable if it is the case that homes are developed to higher <u>space standards</u> (whilst retaining sufficient publicly accessible green infrastructure, and a good housing mix).</p> <p>In conclusion, it is suggested that effects are uncertain, but Option 2 is preferable on balance. Significant effects are unlikely.</p>
4) To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	★ 1	★ 1	<p>The baseline situation would likely involve the decline of Fort Halstead as an <u>employment</u> location, given DSTL are set to relocate and QinetiQ’s future presence on the site is based on the assumption that there will be new neighbours secured for the site. Given the nature of the existing buildings on the site, there would be very little potential to attract new ‘high value’ businesses. It is likely that the site would increasingly be occupied by lower value / transient businesses.</p> <p>Either option would secure the site’s future as an employment location, leading to benefits in terms of this objective given that the site is accessible from <u>relatively deprived locations</u>, including Swanley to the north.</p> <p>Benefits would be indirect, and are unlikely to be significant. Even under a baseline situation, the site would continue to provide employment opportunities (including those accessible to lower skilled workers) for a number of years.</p>

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
5) To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	2	1	<p>Either scheme would likely enable a situation whereby there is <i>sufficient</i> potential for residents to access community services and facilities; however, the site is less than ideal, given its relative isolation / limited accessibility by public transport. The nearest towns offering a comprehensive range of facilities and services are Sevenoaks (8km) and Orpington (9km). There are also a number of villages close to the site: Knockholt Pound (local shop, pub and garden centre); Halstead (local primary school and publ); Otford (local shops, primary school and medical facilities); and Dunton Green / Riverhead (Tesco superstore).</p> <p><b>Option 1</b> would enable delivery of <u>local facilities</u> including a community centre. The Viability Review submitted, by the Council, to the ADMP Examination finds that: <i>“The number of residential units at 450 new dwellings... is not high enough to justify the scheme incorporating a local convenience shop, as it will struggle to be viable with a catchment population of circa 1,250 residents”</i>.<sup>24</sup> However, the site promoters disagree, suggesting that a convenience shop may be viable once the custom of employees is taken into account. The promoters state that there is the potential to design a village centre with sufficient flexibility to enable retailers to respond to demand.<sup>25</sup> The current Development Framework also proposes a range of recreational facilities, including a cricket pitch with pavilion and a network of green spaces/links. There is also an evidence-based expectation that a ‘country-house’ style hotel will be delivered that provides public leisure and recreation facilities (e.g. coffee shop and gym).</p> <p><b>Option 2</b> would likely deliver more, although the margins may be slim. The Viability Review states that: <i>“Where the number of dwellings increases to 750 - 1,000, there may be an opportunity for a local shop to be commercially viable... Depending on the facilities provided by QinetiQ, there may be demand for a catering outlet... The market demand for larger format retail is not considered to be attractive, given the isolated nature of the site...”</i> A 750 – 1000 home scheme proposed in 2010 did include “a local centre incorporating approximately 4,000m<sup>2</sup> retail and a health centre”. Option 2 could potentially enable development of a centre that complements the existing centres at nearby Halstead and Knockholt Pound, both ‘Service Villages (Group B)’ with a population of under 1,500 residents. The Council, when considering the 1,000 home scheme in 2010 did come to the conclusion that the scale of shops, services and community facilities is likely to be appropriate for a service village, and not compete unduly with other centres nearby.<sup>26</sup> Option 2 would also likely deliver a <u>primary school</u>, which is an important consideration. The Council has previously submitted a view that a scheme of more than 750 homes would support delivery of a primary school.<sup>26</sup></p> <p>In conclusion, it is suggested that effects are uncertain. Significant negative effects are unlikely on the basis that it will be possible to develop a community where issues around poor accessibility and isolation can be avoided, even for those without a car. <b>Option 2</b> performs best, but it is not suggested that there will be significant benefits as this far from an ideal location (and never will be an ideal location, given nil potential for further expansion). The baseline situation could well be preferable, particularly as it could possibly involve a ‘sustainable urban extension’ (SUE). An SUE would enable good accessibility; and the reduced costs associated with developing a greenfield site would enable more funds to be made available for community infrastructure.</p>

<sup>24</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf)

<sup>25</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0009/131787/HDC-53-SDC-and-AKLLP-SOCG-Fort-Halstead-14-03-14-Final.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0009/131787/HDC-53-SDC-and-AKLLP-SOCG-Fort-Halstead-14-03-14-Final.pdf)

<sup>26</sup> Statement of Common Ground entered into between SDA and the promoters of a 1,000 home scheme at the time of the Core Strategy Examination.

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
6) To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	2	★ 1	<p><u>Air quality</u> is unlikely to be an issue associated with development of Fort Halstead. Whilst the District Council has declared 11 Air Quality Management Areas (AQMAs), including two associated with busy roads passing through the Sevenoaks urban area, it is assumed that neither option would have a notable bearing.</p> <p>With regards to <u>greenhouse gas emissions resulting from private car use</u>, this is an important consideration; however, this is an issue more appropriately considered below, under Objective 9.</p> <p>An important issue to give consideration to here is the potential to support high standards of sustainable design and construction, and design-in low carbon energy infrastructure; and hence minimise <u>greenhouse gas emissions associated with the built environment</u>. Either option would involve relatively 'large scale' growth, and hence there would be good potential to take an ambitious approach, i.e. an approach that would not be financially viable as part of small developments. It is fair to assume that the baseline situation would involve development locally of few, if any, developments on this scale in the short-term; however, in the longer term there could be a need to explore sustainable urban extension (SUE) options. A SUE would likely have greater potential to incorporate low carbon measures, given the lower costs associated with greenfield development.</p> <p>The Viability Review considered the potential for a 450 home scheme to deliver housing at 'Level 5' of the Code for Sustainable Homes (CfSH) as well as an 'energy centre', which would provide a low carbon source of heat and power (possibly, given the availability of storage space, fuelled by biomass). The conclusion is that the viability of a scheme involving both CfSH Level 5 and an energy centre is at best marginal. The potential to achieve these measures would increase significantly under Option 2.<sup>27</sup> On this basis, it is predicted that <b>Option 2</b> would lead to <b>significant positive effects</b> on the baseline in relation to per capita greenhouse gas emissions from the built environment.</p>

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<sup>27</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0010/127648/Fort-Halstead-Final-Viability-Report-Public.pdf)

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
7) To conserve and enhance biodiversity and geodiversity	★ 1	2	<p>The site is located within an area (the North Downs escarpment) that includes important woodland and chalk downland habitats. There are valued habitats on the Fort Halstead site that will contribute to some extent to the wider 'ecological network'. There are areas of ancient woodland and unimproved chalk grassland, and buildings are set within large grassed areas and punctuated by mature trees / small tree groups (possibly remnants of the woodland that largely covered the site prior to the latter part of the 20<sup>th</sup> Century<sup>28</sup>). These patches of habitat within the built-up part of the site have benefited from the lack of intensive use, but are not subject to any formal ecology-related planning designations.</p> <p>A considerable amount of work has been done in order to demonstrate that development of a 450 home scheme (<b>Option 1</b>) could accommodate existing areas and features of biodiversity importance. This includes development of an 'Ecological Management Plan', which has been reviewed by Natural England and been found to be broadly acceptable (albeit Natural England emphasise the limited nature of their review). There are clear commitments to retaining and enhancing (through the adoption of an appropriate management regime) the most important features within the site, i.e. woodland and areas of species grassland. Efforts will also be made to maintain 'second tier' features. The illustrative masterplan has been carefully designed to retain as many of the existing trees as possible, incorporating them into the green infrastructure network. However, some commitments are perhaps more questionable, including the commitment to ensure (through a Green Infrastructure Plan) "no additional access will be provided to areas of ancient woodland/chalk grassland." The suggestion that it will be possible to... "support local Biodiversity Action Plan (BAP) targets, including those objectives set within the AONB Management Plan" requires further explanation.</p> <p>Kent County Council has reviewed the Ecological Management Plan, and finds that, overall: "the reports demonstrate a reasonably good understanding of the ecological value of the site, and the potential ecological constraints to its development." KCC note that measures are set to be in place to ensure effective conservation of protected species, but that: "The Ecological Management Plan presents less certainty in relation to the sensitive habitats on the site; in particular the increased potential for direct and indirect impacts to the ancient woodland." The review notes the lack of details around the ancient woodland's condition and sensitivity and concludes by requesting a larger vegetated 'buffer' between the built up area and the ancient woodland.</p> <p>The issue of an appropriate buffer is currently the subject of ongoing debate between specialists. On the basis of the KCC findings, however, it is possible to predict that <b>Option 2</b> would likely lead to <b>significant negative effects</b>. A higher density development could hinder the potential to develop an appropriate (30m) buffer, and there would be significantly greater recreational uses (etc.) of the woodland, leading to disturbance and possibly other forms of damage. On the assumption that it will be possible to amend the Ecological Management Plan to reflect KCCs concerns, <b>Option 1</b> is not predicted to result in significant negative effects. Negative effects are predicted, but this conclusion is reached with some uncertainty. There could be the potential for targeted enhancements that support biodiversity locally.</p>

<sup>28</sup> The Heritage Study explains that throughout the 19<sup>th</sup> century the site, including the location of the Fort, was wooded. The 1939 map shows that the land between the earthworks and boundary was only sparsely wooded, but the change of use to research and development brought with it the need for increased secrecy and the maps during the second half of the 20<sup>th</sup> century show considerable tree encroachment. See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0009/128637/HDR-Armstrong-Kent-LLP-CBRE-19-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0009/128637/HDR-Armstrong-Kent-LLP-CBRE-19-Matter-6.pdf)

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
<p>8a) To protect, enhance and make accessible for enjoyment, <b>the countryside</b> and the historic environment</p> <p>[N.B. The discussion here relates to 'the countryside'. The historic environment is considered separately in the following row.]</p>	1	2	<p>Kent Downs AONB Executive does not support either option; however, the Inspector charged with examining the ADMP suggests (in his note of April 13<sup>th</sup>) that a mixed use scheme can be brought forward (sympathetically, in-line with policy) without significant impacts to the integrity of the AONB.<sup>29</sup> It is also the case that the Council has, in the past, tentatively come to the conclusion that there is no potential for significant visual impacts to the AONB to result from a redevelopment scheme.<sup>29</sup></p> <p>Through their representations to the Examination, the AONB Executive seeks to demonstrate that, whilst an employment focused redevelopment (including with a hotel) would be appropriate, allowing for a mixed use development would be contrary to the NPPF. They draw attention to the fact that <i>"Although this is a brownfield site the NPPF policies relating to the AONB for major development within the AONB still apply."</i> In other words, there is a need to give 'great weight' to conserving landscape and scenic beauty.<sup>30</sup> With regards to a 450 home scheme (<b>Option 1</b>) the AONB Executive predicts impacts to the AONB resulting from: hours of use, surroundings (on the basis that uses, e.g. bus stops, can 'spill-out' of the site), visual impact (e.g. given that residents can damage screening vegetation), wildlife, light pollution, and traffic (in particular, given use of the Star Hill site entrance). It is fair to assume that the AONB Executive would predict more severe impacts to result from <b>Option 2</b>.</p> <p>The AONB Executive's concerns had been raised previously (as part of the consultation on the Pre-submission Plan) and hence CBRE, on behalf of the site promoter, was able to respond to them at the time of the Examination through submission of an 'AONB Report'.<sup>31</sup> The AONB Report is supported by a Landscape and Visual Appraisal.<sup>32</sup> The purpose of the AONB Report is to <i>"demonstrate that [a 450 home scheme] will have no greater impact on the AONB than the existing use; that residential uses can be accommodated on the Site without causing adverse effects; and that a programme of landscape management and access improvements will bring about overall enhancements to the AONB."</i> The AONB Report considers the merits of a 450 home scheme (<b>Option 1</b>) under a 'framework' of headings developed to reflect national guidance. Under each heading, the report finds the likelihood of benefits for the AONB. The conclusion is reached that: <i>"The Proposed Redevelopment will enhance natural heritage features, ensuring the sensitive management of the woodland, mature trees and areas of chalk, semi-improved and neutral grassland... [and] benefit the understanding and enjoyment of the AONB, and the social and economic wellbeing of communities within the AONB."</i> The following are some more detailed findings in relation to a 450 home scheme (<b>Option 1</b>):</p> <ul style="list-style-type: none"> <li>• On tranquillity - The Report draws on a Transport Assessment<sup>33</sup> and Lighting Statement<sup>34</sup> to inform a conclusion that: <i>"There will be no noticeable increase in traffic movements and an overall reduction in lighting levels"</i>. This conclusion is dependent on the implementation of masterplanning, design and construction measures, principles for which have been established.</li> </ul>

<sup>29</sup> A 2010 statement of common ground prepared for the Core Strategy Examination stated that: *"The Council accepts that a development, broadly of the scale and form tested by AK and illustrated in these photo montages, would, from the viewpoints submitted and agreed with the Council and their consultants, have no significant adverse effects on views, either during the day or night."*

<sup>30</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0011/128738/HDR-Kent-Downs-AONB-05-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0011/128738/HDR-Kent-Downs-AONB-05-Matter-6.pdf)

<sup>31</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0007/128626/HDR-Armstrong-Kent-LLP-CBRE-10-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0007/128626/HDR-Armstrong-Kent-LLP-CBRE-10-Matter-6.pdf)

<sup>32</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0005/128633/HDR-Armstrong-Kent-LLP-CBRE-15-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0005/128633/HDR-Armstrong-Kent-LLP-CBRE-15-Matter-6.pdf)

<sup>33</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0004/128632/HDR-Armstrong-Kent-LLP-CBRE-14-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0004/128632/HDR-Armstrong-Kent-LLP-CBRE-14-Matter-6.pdf)


<sup>34</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0011/128639/HDR-Armstrong-Kent-LLP-CBRE-21-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0011/128639/HDR-Armstrong-Kent-LLP-CBRE-21-Matter-6.pdf)



Objective	Alternatives		Discussion
	Opt 1	Opt 2	
			<ul style="list-style-type: none"> <li>The findings of the Transport Assessment are considered in more detail, below.</li> <li>With regards to lighting, it is the case that: <i>“A lighting strategy has been prepared, setting out the principles for the lighting design to be provided as a part of the Proposed Redevelopment. The replacement of existing lighting equipment will provide an opportunity to install new more efficient equipment with greater control of unwanted light, and therefore reduce upwards light... A number of lighting installations will be removed, particularly those at the West Gate / Star Hill Road...”</i></li> <li>On visual impact - <i>“The Proposed Redevelopment will generally consist of 1 – 2.5 storey buildings, and will be visually contained by the surrounding woodland... [T]here are currently a number of tall buildings within the site which are visible above the tree-line. These will be demolished... thereby improving views into the AONB.”</i> Elsewhere, it is stated that: <i>“[D]evelopment of the Site within the perimeter vegetation would not result in significant visual intrusion... Indeed... GIS analysis has shown the potential visibility of the proposed development [relative] to that of the existing to be considerably reduced.”</i> <ul style="list-style-type: none"> <li>On remoteness and isolation – <i>“The site is already heavily developed and due to its location on the periphery of the AONB boundary is heavily influenced by major transport routes including...”</i></li> </ul> </li> <li>On understanding and enjoyment of the AONB – <i>“The redevelopment of the site from a high security military/defence research facility to a mixed use area will allow members of the public to access an area of the AONB that was previously private.”</i></li> </ul> <p>It is worthwhile giving further consideration to the findings of the Transport Assessment. With regards to a 450 home scheme (<b>Option 1</b>) the assessment finds that:</p> <ul style="list-style-type: none"> <li>There should not be any requirement to make major improvements to the offsite highway network (e.g. road widening), although there may be a need for a capacity upgrade at the A21 / A224 / M25 Junction 4 link roundabout in the longer term.</li> <li>Overall there will be slight increase in traffic movements along roads within the AONB and changes to the number of vehicle movements on some key routes:             <ul style="list-style-type: none"> <li>The main impact of the proposed development will be on the section of Star Hill between the site access and the A224 which lies within the AONB and could potentially become a popular ‘rat run’ to Bromley. It has been concluded that there is a low risk of this occurring. This conclusion is based upon an assessment of likely journey times using the alternative routes (which suggests that the more attractive route will be via the main site access, and the A224 and Old London Road to the A21) and by reviewing past use of the secondary site access at times that it is available. Star Hill currently carries around 3,300 vehicles per day with a peak hour flow of about 400. It is estimated that the proposed development would increase peak flows by around 60 vehicles during the PM peak hour. The likely increase in traffic flow even at peak times is therefore about 1 vehicle per minute, which would not be a noticeable increase in traffic movements.</li> <li>Also, Sundridge Road (between Star Hill Roundabout and A25) is expected to have an additional 41 trips during the AM peak and 46 trips during the PM peak. Whilst this link does lie within the AONB the maximum level of increase is less than 1 vehicle per minute, which would not be a noticeable increase in traffic movements.</li> </ul> </li> <li>It is likely that an improvement will be required at the <u>main site access junction</u> between Crows Drive / Otford Lane and the</li> </ul>


Objective	Alternatives		Discussion
	Opt 1	Opt 2	
			<p>A224. This may take the form of a traffic light controlled junction (which will enable pedestrian crossing). A minor junction improvement may also be required at the Star Hill Lane site access junction in order to improved visibility splays.</p> <ul style="list-style-type: none"> <li>• There is the potential for demand for parking at the nearby stations, including Knockholt, where capacity is limited. However, effects can be mitigated (e.g. through bus routes).</li> <li>• The scheme may also include new bus stops for the 402 Bromley to Tunbridge Wells service.</li> </ul> <p>In conclusion, with regards to landscape, the AONB Report makes an argument in support of a 450 home scheme (<b>Option 1</b>), that is, on the face of it, highly convincing. This is also the conclusion reached by landscape specialists (Chris Blandford Associates) commissioned by SDC to review the AONB Report. CBA conclude that: <i>“The Fort Halstead redevelopment proposals as reviewed do not appear to impact on the AONB, nor does it on the openness of the Green Belt.”</i> Indeed, the CBA Report goes as far as to concur with the finding of the AONB Report that there will be wide-ranging benefits to the AONB.<sup>35</sup></p> <p>The CBA review highlights some methodological deficiencies and evidence gaps (e.g. around photo montages), but concludes that these do not have a bearing on overall conclusions. One point to note is that the CBA review of the AONB Report did not explore in detail the assumptions inherent in the Transport Assessment, which in turn feed into the AONB Report (e.g. the assumption that the masterplan will reduce the attractiveness of using Star Hill).</p> <p>The AONB Executive, and others, may disagree with CBA on specific points, and will have a chance to respond to the AONB Report during the consultation on Main Modifications. The AONB Executive, and others, may also want to raise more detailed issues around the masterplan that may or may not be potential of strategic importance. For example, there is an issue around the hotel, with the AONB Executive’s submission to the ADMP Examination stating that: <i>“The current Fort Halstead Draft Development Framework... shows the hotel on a confined plot in the centre of the site overlooking the cricket pitch: that is not how we expect a hotel to be developed in the Kent Downs AONB.”</i> Until such time as the AONB Executive has had the opportunity to respond to the AONB Report, it is appropriate to conclude ‘uncertain’ effects in relation to <b>Option 1</b>.</p> <p>The CBA review also asks the question: What level of development would be acceptable? The answer provided by CBA is that: <i>“There may be indirect landscape and visual effects that could result from changing... the amount, massing and location of development types within the site, but the current wording of Policy EMP3 would enable effective planning control to be exercised due to reference to the Green Belt and AONB policies. Visibility and character of development would therefore not be substantially different regardless of the EMP3 policy wording with respect to the development mix.”</i> On this basis, it might be possible to predict that <b>Option 2</b> (i.e. a 900 home scheme) would be ‘OK’ in landscape terms. However, this conclusion is not clear. For the purposes of this current appraisal, it is appropriate to take a precautionary approach, and predict that higher density development would lead to a ‘step change’ in the nature of effects, given the sensitivities around building heights and impacts to the local highways network. As such, Option 2 is predicted to result in negative effects in terms of landscape.</p>

<sup>35</sup> The CBA report is currently in draft form, and is not publically available.

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
<p>8b) To protect, enhance and make accessible for enjoyment, the countryside and <b>the historic environment</b></p> <p>[N.B. The discussion here relates to 'the historic environment'. The countryside is considered separately in the row above.]</p>		<p>2</p>	<p>The site has played a significant role in British military history, initially as a fort and then as a national centre for research and development. Fort Halstead itself, and the buildings within, represent the key heritage assets. The vast majority of buildings beyond the fort are of a generic and functional built form with little or no architectural interest and varied historic interest (those associated with the development of the atomic bomb being of associative interest). The most important is Building Q14, a Grade II listed building of key historic interest and moderate architectural interest. Whilst non-designated buildings and assets (structures, infrastructure and layout) may not be of particular heritage value in their own right, they do form the context within which the designated assets are experienced. In general, the setting that extant heritage assets enjoy is of a built-up environment with infrastructure, set amongst trees and surrounded for the most part by a wooded context.</p> <p>According to the 'Built Heritage Statement' prepared on behalf of the scheme promoters, the following can be expected of a 450 home scheme (<b>Option 1</b>):<sup>36</sup></p> <ul style="list-style-type: none"> <li>• All key assets within the site – notably Fort Halstead – will be conserved (including through sympathetic uses that maintain its setting) and enhanced (with a focus on educational uses). Furthermore the bunkers associated with the facility – although not designated for their heritage value – will be retained and incorporated within an area of open space, providing a link to the more recent history of the site.</li> <li>• Building Q14 will be retained and incorporated in the development, indeed it will be located alongside the proposed historic interpretation centre, which will aid the understanding of heritage significance of the Site.</li> <li>• There are no ancient field boundaries or routeways within the site, and the change of use will not require modifications to local road network (which is associated with ancient field boundaries, droveways and sunken lanes).</li> </ul> <p>It is also the case that the Heritage Statement puts forward a detailed, and ultimately convincing argument. Importantly, English Heritage has “welcomed positive engagement, and encourage that the site is planned for positively.”<sup>37</sup> Either option would represent a positive approach relative to the baseline situation, which would be one whereby the perimeter fence would eventually come down, and so access to Fort Halstead would increase, but there would be no formal right of access and no measures in place for managing access.</p> <p>On this basis, it is possible to conclude that <b>Option 1</b> will result in <b>significant positive effects</b>. <b>Option 2</b>, on the other hand, would lead to uncertain effects on the basis that there could be a necessity for less than sympathetic development in the vicinity of the key heritage assets, and there would be a more radical change in character of the site overall.</p>

<sup>36</sup> See [http://www.sevenoaks.gov.uk/\\_data/assets/pdf\\_file/0009/128637/HDR-Armstrong-Kent-LLP-CBRE-19-Matter-6.pdf](http://www.sevenoaks.gov.uk/_data/assets/pdf_file/0009/128637/HDR-Armstrong-Kent-LLP-CBRE-19-Matter-6.pdf)

<sup>37</sup> According to the Built Heritage Statement

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
9) To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	2	1 	<p>Fort Halstead is clearly not an ideal location from a perspective of wishing to discourage per capita distance driven by private car / encourage a modal shift to walking, cycling and public transport:</p> <ul style="list-style-type: none"> <li>• The site is relatively isolated, with the nearest town being Sevenoaks, eight kilometres to the south.</li> <li>• The site is well connected by road, with easy access to the National Motorway Network via the M25, junction 4.</li> <li>• Existing access by public transport is relatively poor, and there are inherent challenges associated with providing traditional, commercially viable public transport solutions in a rural environment.               <ul style="list-style-type: none"> <li>• DSTL currently run a private peak period shuttle bus between the site and Knockholt and Orpington Stations. There are three buses during the morning peak and three during the evening peak. This runs every weekday with an average of 98 passengers a day.</li> </ul> </li> <li>• The existing network of rural lanes and unsurfaced/unlit footpaths in the vicinity of the site creates challenges for the development of a pedestrian and cycle network. The local topography also means that cycling from Sevenoaks to the site would be a challenge. However, the cycle route to Knockholt Station, approximately a 4.5 kilometre ride, is <i>relatively</i> flat (with a change in elevation of ~75m) and there are existing advisory cycle lanes on the Old London Road.</li> </ul> <p>A Transport Strategy has been prepared for a 450 home scheme (<b>Option 1</b>). In-light of discussions with the local bus service providers and KCC, the Strategy finds that the preferred option is to promote a community bus service to link the site with at least one commuter station and to provide links to the Riverhead Tesco store and to Sevenoaks at off peak times. It is anticipated that an attractive service can be provided for around £160,000 per annum. It is suggested that this cost could be funded through S106 in the short term with its long term viability guaranteed through other means (e.g. a residential service agreement). It is suggested that there may also be an opportunity to secure the diversion of the 402 bus service in the longer term.</p> <p>Another consideration is the potential to access a train station (ideally by non-car means). The Transport Assessment suggests that a 450 home scheme would generate a demand for around 60 commuter trips per day by train up to London. It is suggested that these trips will be split between a number of stations in the area and so the impact on any one station will be small.</p> <p>Despite the measures proposed through the transport strategy, it seems likely that <b>Option 1</b> would lead to <b>significant negative effects</b> on the baseline (i.e. a situation whereby levels of employment at Fort Halstead decline over time and housing is focused primarily on areas with better accessibility to higher order towns). This conclusion takes into account the fact that a proportion of people living at Fort Halstead (a figure of 10% has been suggested) will also work on site. With regards to <b>Option 2</b> it is difficult to draw a conclusion. On one hand, Option 2 would involve more housing in a location that is inherently constrained, but on the other hand there would certainly be the potential to fund a higher quality bus service (over the long term) and possibly also fund other transport infrastructure (but not major infrastructure, e.g. a train station upgrade). It is noted that, in 2010 at the time of the Core Strategy Examination, SDC did submit a view that “a mixed use development of ~1000 homes would likely enable a modal share close to that achieved by an urban extension, albeit with longer journey lengths”.<sup>38</sup> Uncertain effects are predicted..</p>

<sup>38</sup> Statement of Common Ground entered into between SDA and the promoters of a 1,000 home scheme at the time of the Core Strategy Examination.

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
10) To create a high quality built environment	★ 1	2	The baseline situation is one whereby Fort Halsted will become blighted by underused buildings, which will stifle any attempts to deliver a long term solution (bar conversion of the site for less intensive uses, e.g. around nature conservation and recreation). There would be the likelihood of lower value uses/transitory businesses making use of the buildings on site. This could lead to management issues and an inability to meet wider environmental objectives. On this basis, either option is predicted to result in <b>significant positive effects</b> . Option 1 is predicted to perform better, on the basis that lower density development will offer most opportunity to ensure a high quality built environment (particularly given that AONB constraints prevent tall buildings).
11) To promote sustainable forms of development and sustainable use of natural resources	2	★ 1	Most of the issues that might be considered under this topic have already been addressed above. One issue relates to ‘the need to maintain the soil resource’ locally, i.e. through avoiding development of greenfield sites, and in particular ‘best and most versatile’ agricultural land. Either option would involve making good use of a previously developed site. This is compared to a baseline situation whereby a future Strategic Housing Market Assessment (SHMA) could well prompt a Green Belt Review, and in turn the designation of greenfield land for housing in Sevenoaks. Either option would lead to <b>significant positive effects</b> , and Option 2 performs best. Another consideration relates to the potential for good waste management. A larger scheme could possibly result in funds being made available for community waste management infrastructure; however, it’s not possible to assume that this would be the case.

Objective	Alternatives		Discussion
	Opt 1	Opt 2	
12) To encourage high and stable levels of employment and sustain economic competitiveness	★ 1	★ 1	<p>As has been discussed above, the baseline scenario would involve withdrawal of the remaining high value user (QinetiQ) and the existing built accommodation being used for generally lower value/transitory businesses. This would be to the detriment of the local economy, and hence either option would lead to <b>significant positive effects</b> on the basis that higher value employment uses on the site would be secured for the long term.</p> <p>Work undertaken in support of the proposed 450 home scheme (<b>Option 1</b>) suggests that, in addition to securing QinetiQ as a major employer, there is the potential for redevelopment to result in creation of “a new business community, which could provide a high quality setting for up-to 150 high value, small businesses”. Analysis suggests that the number of new jobs provided will more than make up for the loss of jobs associated with the relocation of DSTL.”<sup>39</sup></p> <p>It is unlikely to be the case that more employment floor-space / jobs could be secured on the site under <b>Option 2</b>, although this is not something that has been tested. It is likely that a lack of market demand would present a barrier to the achievement of more jobs on-site. The two most recent SDC Annual Monitoring Reports (AMRs) – for 2012 and 2013 – describe a trend of very low take up of B1 employment accommodation in Sevenoaks; and further evidence is provided by the URS Business Survey (2013), which found that only 7% of small businesses wanting new accommodation would consider a move to Fort Halstead (albeit this may still represent a substantial number of businesses).</p> <p>The two options are predicted to perform equally well, although it is recognised that there could be some benefits associated with Option 2. For example, there might be greater potential to fund employment redevelopment in advance of housing.</p>
13) To improve the development/retention of skills	★ 1	★ 1	<p>QinetiQ has indicated that, once the long-term future of the company on-site is secured, the opportunity will be taken to expand (by around 50 employees) and consolidate activities in one building. With the company’s local presence strengthened there could be motivation to fund an apprenticeship programme, or even possibly a small college-type facility. The wide-ranging nature of the QinetiQs activities means that the company could prove well suited to a role supporting skills development locally</p>

<sup>39</sup> See [http://www.sevenoaks.gov.uk/data/assets/pdf\\_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf](http://www.sevenoaks.gov.uk/data/assets/pdf_file/0019/128620/HDR-Armstrong-Kent-LLP-CBRE-07-Matter-6.pdf)

4.4 Appraisal summary

Table 4.2: A summary of the alternatives appraisal

Objective	Alternatives	
	Opt 1	Opt 2
1) To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	2	★1
2) To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	2	★1
3) To improve the health and well-being of the population and reduce inequalities in health	2	★1
4) To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	★1	★1
5) To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	2	★1
6) To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	2	★1
7) To conserve and enhance biodiversity and geodiversity	★1	2
8a) To protect, enhance and make accessible for enjoyment, <b>the countryside</b> and the historic environment	★1	2
8b) To protect, enhance and make accessible for enjoyment, the countryside and <b>the historic environment</b>	★1	2
9) To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	2	★1
10) To create a high quality built environment	★1	2
11) To promote sustainable forms of development and sustainable use of natural resources	2	★1
12) To encourage high and stable levels of employment and sustain economic competitiveness	★1	★1
13) To improve the development and retention of skills	★1	★1

In conclusion, **Option 1** performs best in terms of two key environmental objectives – i.e. those relating to ‘biodiversity’ and ‘countryside / heritage’. It is certainly the case that Option 2 might test the in-principle support that is currently shown to redevelopment by Natural England and English Heritage, and would further entrench the Kent Downs AONB Executive’s opposition. Option 1 would, however, likely lead to significant negative effects in terms of the objective to minimise per capita CO<sub>2</sub> emissions from transport. Effects can be mitigated, including through policy, but the potential to support modal shift away from car travel is almost certainly less than would be the case at an alternative location for strategic housing growth locally.

**Option 2** performs best in terms of two important and related objectives – those relating ‘health’ and ‘access to services/facilities’ – on the basis that there should be the potential to fund additional services/facilities as part of the development; however, there is some uncertainty in this respect. Option 2 also performs best in terms of the climate change mitigation related objectives, including on the basis that there would be the potential to support a better bus service and hence modal shift away from the car. It is also obviously the case that Option 2 performs best in terms of objectives relating to ‘housing’ and efficient use of natural resources ‘i.e. soils’. However, Option 2 performs poorly in terms of biodiversity and countryside / heritage objective, with significant negative effects predicted for biodiversity on the basis that concerns around potential impacts to ancient woodland would be more difficult to address.

**5 WHAT ARE THE NEXT STEPS**

5.1.1 In-light of the appraisal findings presented in this Interim SA Report, the Council will consider options for Fort Halstead before drafting a new policy approach (see Box 5.1) and publishing that for consultation as a Main Modification (to the ADMP as previously submitted).

*Box 5.1: Developing a policy for Fort Halstead*

The aim of this Interim SA Report is primarily to inform the choice between the two alternative approaches – i.e. the choice of whether to promote a 450 home scheme or a 900 home scheme. It is difficult to suggest policy approaches that might be put in place to mitigate / enhance effects, without knowing what the preferred option will be; however, it is possible to make some broad recommendations at this stage.

The primary consideration perhaps relates to how the second bullet point within submitted Policy EMP3 – “Provide accessibility to jobs, shops and services by public transport, cycling or walking, including proposals for onsite provision proportionate to the proposed development” – might be strengthened. The might be the potential to refer to a level of accessibility (e.g. in terms of bus frequency) that would be required.

Also, the fifth bullet point – “Protect and integrate the Scheduled Ancient Monument and listed buildings into the development with improved access and setting” – could be strengthened by a reference to a more specific ‘access’ related objective.

5.1.2 An SA Report<sup>40</sup> will be published alongside. The SA Report will be structured in a similar fashion, although the content will vary in that:

- there will be a lengthier ‘story’ to tell when answering the question ‘What has plan-making / SA involved up to this point?’, i.e. it will be possible to also present alternatives appraisal findings and explain the reasoning behind the preferred approach;
- answering the question ‘What are SA findings at this current stage?’ will involve presenting an appraisal of the proposed Main Modifications; and
- answering the question ‘What happens next?’ will involve explaining that the plan will be finalised (possibly to include further Examination hearings) and then adopted.

<sup>40</sup> The document published alongside Main Modifications might best be labelled an SA Report ‘Addendum’ on the basis that it sets out to inform consultation on Modifications only (as opposed to ‘the ADMP as modified’). The ADMP ‘SA Report’ was published for consultation alongside the ADMP in 2013.



## Pest Control Service Quotation Evaluation - June 2014

<b>Quotations Score Summary</b>				
Price Evaluation Criteria	Score Weighting %	Maximum Score	Score Awarded	MEAT Ranking
<b>Sevenoaks Direct Services</b>				
Price - Schedule 2.1	60	60	35	1
Price - Schedule 2.2		33	22	
Price - Schedule 2.3		30	30	
Price - Schedule 2.4		30	20	
Price - Schedule 2.5		30	0	
Compliance	40	15	15	
Technical Merit & Quality Factors		60	59	
Information Supplied		20	20	
Acceptance of Contract Conditions		9	9	
Completeness of Response		18	18	
	<b>100</b>	<b>305</b>	<b>228</b>	75%
<b>MITIE Pest Control</b>				
Price - Schedule 2.1	60	60	38	2
Price - Schedule 2.2		33	33	
Price - Schedule 2.3		30	20	
Price - Schedule 2.4		30	30	
Price - Schedule 2.5		30	0	
Compliance	40	15	15	
Technical Merit & Quality Factors		60	47	
Information Supplied		20	16	
Acceptance of Contract Conditions		9	9	
Completeness of Response		18	18	
	<b>100</b>	<b>305</b>	<b>226</b>	74%
<b>Noah's Ark Environmental Services</b>				
Price - Schedule 2.1	60	60	53	3
Price - Schedule 2.2		33	11	
Price - Schedule 2.3		30	10	
Price - Schedule 2.4		30	10	
Price - Schedule 2.5		30	30	
Compliance	40	15	12	
Technical Merit & Quality Factors		60	38	
Information Supplied		20	18	
Acceptance of Contract Conditions		9	9	
Completeness of Response		18	12	
	<b>100</b>	<b>305</b>	<b>203</b>	67%

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Pest Control Service Quotation Evaluation - June 2014

Points Score - Sevenoaks Direct Services					
Evaluation Heading	Evaluation Criteria	Max. Points	Score Criteria	Points	
Price	Schedule 2.1 - Charge to Customers	60	Lowest rates = highest points	35	
	Schedule 2.2 - Charge/Payment to Council	33	Payment = highest points	22	
	Schedule 2.3 - Charge for SDC facilities	30	Lowest rates = highest points	30	
	Schedule 2.4 - Charge/Payment Total	30	Payment = highest points	20	
	Schedule 2.5 - Commercial Payment	30	Payment = highest points	0	
		Sub-total points =	183	Sub-total=	106.8
Compliance	Compliance with all aspects of specification	15	Compliant	15	
		Sub-total points =	15	Sub-total=	15
Technical Merit & Quality Factors	Company profile	6	In House service provision	6	
	Local area knowledge	6	Substantial local knowledge	6	
	Customer focus - Complaints Handling	6	High Compliments/low complaints	6	
	Financial Standing	6	Local Authority	6	
	Technical capacity and ability	6	In House service provision	6	
	Equalities	6	Policies in place	6	
	Health and Safety Record	6	No investigations, Notices or action	6	
	Sustainability - Environmental Policy ISO 14001?	6	No ISO 14001 accreditation	5	
	Training provision	6	IIP Gold - Good Training provision	6	
	Contract Support Costs	6	In House service provision	6	
		Sub-total points =	60	Sub-total=	59
Information Supplied	Accounts	4	Trading Accounts supplied	4	
	Insurance - Emp., Pub. Liability & Prof. Indemnity	4	All necessary insurance	4	
	Bankers reference authorised & letter supplied?	4	Not required	4	
	H & S Policy, Risk & COSHH Assessments	4	Documents submitted	4	
	H & S Advisor - C.V.	4	In House service provision	4	
		Sub-total points =	20	Sub-total=	20
Acceptance of Contract Conditions	Service delivery from 1st October?	3	Continuation of service	3	
	Acceptance of Formal contract agreement?	3	Not required	3	
	Acceptance of TUPE provisions?	3	Not required	3	
		Sub-total points =	9	Sub-total=	9
Completeness of Response	Assessed completeness of response				
	Form of Quotation signed by authorised party?	3	Yes	3	
	Bona Fide Certificate signed?	3	Yes	3	
	Quotation valid for 90 days?	3	Yes	3	
	Questionnaire information & signed undertaking?	3	Yes	3	
	Assessed capability to support contract elements				
	Guarantee by Parent Company offered?	3	Not required	3	
Claims under Firm's Professional Indemnity?	3	None	3		
	Sub-total points =	18	Sub-total=	18	
	Total Points =	305	Total Points =	227.8	

## Pest Control Service Quotation Evaluation - June 2014

## Points Score - MITIE Pest Control

Evaluation Heading	Evaluation Criteria	Max. Points	Score Criteria	Points	
Price	Schedule 2.1 - Charge to Customers	60	Lowest rates = highest points	38	
	Schedule 2.2 - Charge/Payment to Council	33	Payment = highest points	33	
	Schedule 2.3 - Charge for SDC facilities	30	Lowest rates = highest points	20	
	Schedule 2.4 - Charge/Payment Total	30	Payment = highest points	30	
	Schedule 2.5 - Commercial Payment	30	Payment = highest points	0	
		Sub-total points =	183	Sub-total=	121.1
Compliance	Compliance with all aspects of specification	15	Compliant	15	
		Sub-total points =	Sub-total=	15	
Technical Merit & Quality Factors	Company profile	6	Competitive national company	5	
	Local area knowledge	6	Dartford office	6	
	Customer focus - Complaints Handling	6	High Charges - Complaints guide	2	
	Financial Standing	6	National company large turnover	6	
	Technical capacity and ability	6	Multiple PCO's to cover	6	
	Equalities	6	Policies in place	6	
	Health and Safety Record	6	No investigations, Notices or action	6	
	Sustainability - Environmental Policy ISO 14001?	6	ISO 14001 accreditation	6	
	Training provision	6	Sufficient training provision	4	
	Contract Support Costs	6	Substantial Contract Support Costs	0	
		Sub-total points =	60	Sub-total=	47
	Information Supplied	Accounts	4	Accounts supplied	4
Insurance - Emp., Pub. Liability & Prof. Indemnity		4	All necessary insurance	4	
Bankers reference authorised & letter supplied?		4	No letter	0	
H & S Policy, Risk & COSHH Assessments		4	Documents submitted	4	
H & S Advisor - C.V.		4	Yes - parent company employee	4	
		Sub-total points =	20	Sub-total=	16
Acceptance of Contract Conditions	Service delivery from 1st October?	3	Yes	3	
	Acceptance of Formal contract agreement?	3	Yes	3	
	Acceptance of TUPE provisions?	3	Yes	3	
		Sub-total points =	9	Sub-total=	9
Completeness of Response	Assessed completeness of response				
	Form of Quotation signed by authorised party?	3	Yes	3	
	Bona Fide Certificate signed?	3	Yes	3	
	Quotation valid for 90 days?	3	Yes	3	
	Questionnaire information & signed undertaking?	3	Yes	3	
	Assessed capability to support contract elements				
	Guarantee by Parent Company offered?	3	Yes	3	
Claims under Firm's Professional Indemnity?	3	None	3		
	Sub-total points =	18	Sub-total=	18	
	Total Points =	305	Total Points =	226.1	

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Points Score - Noah's Ark Environmental Services					
Evaluation Heading	Evaluation Criteria	Max. Points	Score Criteria	Points	
Price	Schedule 2.1 - Charge to Customers	60	Lowest rates = highest points	53	
	Schedule 2.2 - Charge/Payment to Council	33	Payment = highest points	11	
	Schedule 2.3 - Charge for SDC facilities	30	Lowest rates = highest points	10	
	Schedule 2.4 - Charge/Payment Total	30	Payment = highest points	10	
	Schedule 2.5 - Commercial Payment	30	Payment = highest points	30	
	Sub-total points =		183	Sub-total=	114.2
Compliance	Compliance with all aspects of specification	15	No Operating base specified	12	
	Sub-total points =		15	Sub-total=	12
Technical Merit & Quality Factors	Company profile	6	Northampton based SME	3	
	Local area knowledge	6	No local knowledge apparent	0	
	Customer focus - Complaints Handling	6	CS excellence & complaints policy	6	
	Financial Standing	6	Small turnover - limited reserves	2	
	Technical capacity and ability	6	PCO cover - LB of Newham?	3	
	Equalities	6	Policies in place	6	
	Health and Safety Record	6	No investigations, Notices or action	6	
	Sustainability - Environmental Policy ISO 14001?	6	No ISO 14001 accreditation	5	
	Training provision	6	Sufficient training provision	4	
	Contract Support Costs	6	Some Contract Support costs	3	
	Sub-total points =		60	Sub-total=	38
Information Supplied	Accounts	4	Accounts supplied	4	
	Insurance - Emp., Pub. Liability & Prof. Indemnity	4	No Professional Indemnity	2	
	Bankers reference authorised & letter supplied?	4	Yes	4	
	H & S Policy, Risk & COSHH Assessments	4	Documents submitted	4	
	H & S Advisor - C.V.	4	H & S consultants - M.D. CV - Basic	4	
	Sub-total points =		20	Sub-total=	18
Acceptance of Contract Conditions	Service delivery from 1st October?	3	Yes	3	
	Acceptance of Formal contract agreement?	3	Yes	3	
	Acceptance of TUPE provisions?	3	Yes	3	
	Sub-total points =		9	Sub-total=	9
Completeness of Response	Assessed completeness of response				
	Form of Quotation signed by authorised party?	3	Yes	3	
	Bona Fide Certificate signed?	3	Yes	3	
	Quotation valid for 90 days?	3	Yes	3	
	Questionnaire information & signed undertaking?	3	Yes	3	
	Assessed capability to support contract elements				
	Guarantee by Parent Company offered?	3	No	0	
Claims under Firm's Professional Indemnity?	3	None as no insurance	0		
Sub-total points =		18	Sub-total=	12	
Total Points =		305	Total Points =	203.2	

# Pest Control Service Quotation Evaluation - June 2014

Weighted Price Scores									
Price Evaluation Criteria	Score Weighting %	Maximum Weighted Score	Sevenoaks Direct Services						
			Treatment Charge (£) Standard	Max. Sub-score	Sub-score	Treatment Charge (£) Concession	Max. Sub-score	Sub-score	Total Score
<b>Schedule 2.1</b>	50%	60		83%			17%		
Price per visit - no access	2%	4	£29.17	3.32	1.11	£29.17	0.68	0.23	1.33
Advice given but no treatment undertaken	3%	4	£29.17	3.32	2.21	£29.17	0.68	0.23	2.44
Treat Wasps	10%	7	£46.67	5.81	3.87	£29.17	1.19	1.19	5.06
Same time 2nd & subsequent Wasp nests	2%	4	£15.00	3.32	2.21	£10.83	0.68	0.23	2.44
Undertake site survey for Rats or Mice	3%	4	£29.17	3.32	2.21	£29.17	0.68	0.23	2.44
Treat for Rats	10%	7	£91.67	5.81	3.87	£80.00	1.19	0.79	4.67
Treat for Mice	5%	5	£91.67	4.15	2.77	£80.00	0.85	0.57	3.33
Treat for Rats & Mice at the same time	5%	5	£125.00	4.15	2.77	£108.33	0.85	0.28	3.05
Treat Bed-bugs	3%	4	£150.00	3.32	2.21	£150.00	0.68	0.23	2.44
Treat Fleas	2%	4	£95.83	3.32	2.21	£70.83	0.68	0.23	2.44
Treat Cockroaches	2%	4	£166.67	3.32	1.11	£166.67	0.68	0.23	1.33
Treat Squirrels	2%	4	£137.50	3.32	2.21	£137.50	0.68	0.23	2.44
Treat Ants or Cluster Flies	1%	4	£95.83	3.32	1.11	£95.83	0.68	0.23	1.33
									<b>35</b>
<b>Schedule 2.2</b>	10%	33	£7,000.00	27.39	18.26	£0.00	5.61	3.74	<b>22</b>
Price per visit - no access	0%								
Advice given but no treatment undertaken	1%								
Treat Wasps	3%								
Same time 2nd & subsequent Wasp nests	1%								
Undertake site survey for Rats or Mice	0%								
Treat for Rats	2%								
Treat for Mice	2%								
Treat for Rats & Mice at the same time	1%								
Treat Bed-bugs	0%								
Treat Fleas	0%								
Treat Cockroaches	0%								
Treat Squirrels	0%								
Treat Ants or Cluster Flies	0%								

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# Pest Control Service Quotation Evaluation - June 2014

Weighted Price Scores									
Price Evaluation Criteria	Score Weighting %	Maximum Weighted Score	MITIE Pest Control						
			Treatment Charge (£) Standard	Max. Sub-score	Sub-score	Treatment Charge (£) Concession	Max. Sub-score	Sub-score	Total Score
<b>Schedule 2.1</b>	50%	60		83%			17%		
Price per visit - no access	2%	4	£25.00	3.32	2.21	£15.00	0.68	0.45	2.67
Advice given but no treatment undertaken	3%	4	£30.00	3.32	1.11	£20.00	0.68	0.45	1.56
Treat Wasps	10%	7	£45.00	5.81	5.81	£30.00	1.19	0.79	6.60
Same time 2nd & subsequent Wasp nests	2%	4	£10.00	3.32	3.32	£0.00	0.68	0.68	4.00
Undertake site survey for Rats or Mice	3%	4	£30.00	3.32	1.11	£20.00	0.68	0.45	1.56
Treat for Rats	10%	7	£120.00	5.81	1.94	£80.00	1.19	0.79	2.73
Treat for Mice	5%	5	£120.00	4.15	1.38	£80.00	0.85	0.57	1.95
Treat for Rats & Mice at the same time	5%	5	£160.00	4.15	1.38	£100.00	0.85	0.57	1.95
Treat Bed-bugs	3%	4	£180.00	3.32	1.11	£140.00	0.68	0.45	1.56
Treat Fleas	2%	4	£55.00	3.32	3.32	£45.00	0.68	0.68	4.00
Treat Cockroaches	2%	4	£120.00	3.32	3.32	£80.00	0.68	0.68	4.00
Treat Squirrels	2%	4	£160.00	3.32	1.11	£120.00	0.68	0.45	1.56
Treat Ants or Cluster Flies	1%	4	£35.00	3.32	3.32	£30.00	0.68	0.68	4.00
									<b>38</b>
<b>Schedule 2.2</b>	10%	33							<b>33</b>
Price per visit - no access	0%	2	-£5.00	2	2				2
Advice given but no treatment undertaken	1%	3	-£6.00	3	3				3
Treat Wasps	3%	4	-£9.00	4	4				4
Same time 2nd & subsequent Wasp nests	1%	3	-£2.00	3	3				3
Undertake site survey for Rats or Mice	0%	2	-£6.00	2	2				2
Treat for Rats	2%	3	-£24.00	3	3				3
Treat for Mice	2%	3	-£24.00	3	3				3
Treat for Rats & Mice at the same time	1%	3	-£32.00	3	3				3
Treat Bed-bugs	0%	2	-£36.00	2	2				2
Treat Fleas	0%	2	-£11.00	2	2				2
Treat Cockroaches	0%	2	-£24.00	2	2				2
Treat Squirrels	0%	2	-£32.00	2	2				2
Treat Ants or Cluster Flies	0%	2	-£7.00	2	2				2

Agenda Item

## Pest Control Service Quotation Evaluation - June 2014

Weighted Price Scores									
Price Evaluation Criteria	Score Weighting %	Maximum Weighted Score	Noah's Ark Environmental Services						
			Treatment Charge (£) Standard	Max. Sub-score	Sub-score	Treatment Charge (£) Concession	Max. Sub-score	Sub-score	Total Score
<b>Schedule 2.1</b>	50%	60		83%			17%		
Price per visit - no access	2%	4	£10.00	3.32	3.32	£5.00	0.68	0.68	4.00
Advice given but no treatment undertaken	3%	4	£20.00	3.32	3.32	£5.00	0.68	0.68	4.00
Treat Wasps	10%	7	£45.00	5.81	5.81	£30.00	1.19	0.79	6.60
Same time 2nd & subsequent Wasp nests	2%	4	£15.00	3.32	2.21	£10.00	0.68	0.45	2.67
Undertake site survey for Rats or Mice	3%	4	£20.00	3.32	3.32	£5.00	0.68	0.68	4.00
Treat for Rats	10%	7	£90.00	5.81	5.81	£65.00	1.19	1.19	7.00
Treat for Mice	5%	5	£90.00	4.15	4.15	£65.00	0.85	0.85	5.00
Treat for Rats & Mice at the same time	5%	5	£115.00	4.15	4.15	£95.00	0.85	0.85	5.00
Treat Bed-bugs	3%	4	£145.00	3.32	3.32	£100.00	0.68	0.68	4.00
Treat Fleas	2%	4	£100.00	3.32	1.11	£70.00	0.68	0.45	1.56
Treat Cockroaches	2%	4	£165.00	3.32	2.21	£130.00	0.68	0.45	2.67
Treat Squirrels	2%	4	£130.00	3.32	3.32	£98.00	0.68	0.68	4.00
Treat Ants or Cluster Flies	1%	4	£90.00	3.32	2.21	£80.00	0.68	0.45	2.67
									<b>53</b>
<b>Schedule 2.2</b>	10%	<b>33</b>	£10,800.00	27.39	9.13	£3,400.00	5.61	1.87	<b>11</b>
Price per visit - no access	0%								
Advice given but no treatment undertaken	1%								
Treat Wasps	3%								
Same time 2nd & subsequent Wasp nests	1%								
Undertake site survey for Rats or Mice	0%								
Treat for Rats	2%								
Treat for Mice	2%								
Treat for Rats & Mice at the same time	1%								
Treat Bed-bugs	0%								
Treat Fleas	0%								
Treat Cockroaches	0%								
Treat Squirrels	0%								
Treat Ants or Cluster Flies	0%								

Agenda Item

# Pest Control Services Quotation Evaluation - June 2014

## Agenda Item

Suppliers Name:	Sevenoaks Direct Services
	Dunbrik Depot 2 Main Road, Sundridge, Sevenoaks, Kent, TN14 6EP Submitted by Angela Dodge
<b>Tender Requirements</b>	
<b>Price - Schedule 2.1 - Note all prices exclude VAT</b>	
Standard Charges to Customers - 1st year	No Access £29.17, Advice £29.17, Wasps £46.67, Add wasps £15, Survey £29.17, Rats £91.67, Mice £91.67, R & M £125, Bed-bugs £150, Fleas £95.83, C/roaches £166.67, Squirrels £137.50, Ants or flies £95.83
Concessionary Charges to Customers - 1st year	No Access £29.17, Advice £29.17, Wasps £29.17, Add wasps £10.83, Survey £29.17, Rats £80, Mice £80, R & M £108.33, Bed-bugs £150, Fleas £70.83, C/roaches £166.67, Squirrels £137.50, Ants or flies £95.83
Projected primary pest treatment costs, excluding VAT, at standard charge to customers in first year assuming 10 year average treatment numbers.	Rats £91.67 x 100, Mice £91.67 x 92, Wasps £46.67 x 597 £45,462.63
Projected primary pest treatment costs, excluding VAT, at concessionary charge to customers in first year assuming 10 year average treatment numbers.	Rats £80 x 41, Mice £80 x 35, Wasps £29.17 x 89 £8,676.13
<b>Schedule 2.2</b>	
Annual Standard Charge to Council - 1st year	£7,000.00
Annual Concessionary Charge to Council - 1st year	£0.00
Annual Standard Payment to Council - 1st year	£0.00
Individual supplementary charge/treatment to Council	Not scheduled
Individual supplementary payment/treatment to Council	Not scheduled
Projected primary pest treatment income at standard payment to Council in first year assuming 10 year average treatment numbers.	Not scheduled £0.00
Individual supplementary charge/concessionary treatment	Not scheduled
<b>Schedule 2.3</b>	
Charges for Pest Control services at SDC facilities	Rodents Dunbrik £44.34, Hollybush £39.26, Bradbourne £52.30, Wasps £46.67, Advice to SDC EP £54.16/hour
Projected overall annual cost to Council in first year assuming scheduled treatment frequencies.	Rodents Dunbrik £44.34 x 8, Hollybush £39.26 x 8, Bradbourne £52.30 x 7, Wasps £46.67 x 6, Advice to SDC EP £54.16/hour x 6 hours (estimated) £1,639.88
<b>Schedule 2.4</b>	
Charge to Council - 2nd year	£7,210.00
Payment to Council - 2nd year	£0.00
Charge to Council - 3rd year	£7,426.30
Payment to Council - 3rd year	£0.00
Total projected charge to the Council inclusive of charges for services at SDC facilities over contract period	£26,705.01
Total projected payment to the Council inclusive of charges for services at SDC facilities over contract period	N/A
<b>Schedule 2.5</b>	
Sum payable to Council on transfer of commercial details	N/A = £0.00
<b>Compliance</b>	
Method statement	Confirmed compliance with all requirements of specification
Service Hours	Yes
Houly appointment slots and first & last appointments	Yes
Visit return interval 7-12 days	Yes
Extent of Service incl. statement of customer concessions	Yes
Service Centre provision	Yes
Provider complaints handling & resoluion	Yes
Price schedules	Yes
Free telephone advice - 1 to 2 calls each day	Yes
Free pest identification - one insect per week	Yes



**Pest Control Services Quotation Evaluation - June 2014**

Agenda Item

<b>Suppliers Name:</b>	<b>MITIE Pest Control</b>
	5 Limeharbour Court, Limeharbour, London, E14 9RH Submitted by Daniel Ashton
<b>Tender Requirements</b>	
<b>Price - Schedule 2.1 - Note all prices exclude VAT</b>	
Standard Charges to Customers - 1st year	No Access £25, Advice £30, Wasps £45, Add wasps £10, Survey £30, Rats £120, Mice £120, R & M £160, Bed-bugs £180, Fleas £55, C/roaches £120, Squirrels £160, Ants or flies £35
Concessionary Charges to Customers - 1st year	No Access £15, Advice £20, Wasps £30, Add wasps £0, Survey £20, Rats £80, Mice £80, R & M £100, Bed-bugs £140, Fleas £45, C/roaches £80, Squirrels £120, Ants or flies £30
Projected primary pest treatment costs, excluding VAT, at standard charge to customers in first year assuming 10 year average treatment numbers.	Rats £120 x 100, Mice £120 x 92, Wasps £45 x 597 £49,905.00
Projected primary pest treatment costs, excluding VAT, at concessionary charge to customers in first year assuming 10 year average treatment numbers.	Rats £80 x 41, Mice £80 x 35, Wasps £30 x 89 £8,750.00
<b>Schedule 2.2</b>	
Annual Standard Charge to Council - 1st year	Not scheduled
Annual Concessionary Charge to Council - 1st year	Not scheduled
Annual Standard Payment to Council - 1st year	Not scheduled but see projected income payment based on individual primary pest treatment payments to the Council below. <b>Client audit role will be necessary to ensure recovery of all income from treatments.</b>
Individual supplementary charge/treatment to Council	£0.00
Individual supplementary payment/treatment to Council	No Access -£5.00, Advice -£6, Wasps -£9, Add wasps -£2, Survey -£6, Rats -£24, Mice -£24, R & M -£32, Bed-bugs -£36, Fleas -£11, C/roaches -£24, Squirrels -£32, Ants or flies -£7. <b>Query - confirm payments not charges</b>
Projected primary pest treatment income at standard payment to Council in first year assuming 10 year average treatment numbers.	Rats -£24 x 100, Mice -£24 x 92, Wasps -£9 x 597 -£9,981.00
Individual supplementary charge/concessionary treatment	£0.00
<b>Schedule 2.3</b>	
Charges for Pest Control services at SDC facilities	Rodents Dunbrik £90, Hollybush £75, Bradbourne £90, Wasps £45, Advice to SDC EP £47/hour
Projected overall annual cost to Council in first year assuming scheduled treatment frequencies.	Rodents Dunbrik £90 x 8, Hollybush £75 x 8, Bradbourne £90 x 7, Wasps £45 x 6, Advice to SDC EP £47/hour x 6 hours (estimated) £2,502.00
<b>Schedule 2.4</b>	
Charge to Council - 2nd year	£0.00
Payment to Council - 2nd year	-£9,981.00
Charge to Council - 3rd year	£0.00
Payment to Council - 3rd year	-£9,981.00
Total projected charge to the Council inclusive of charges for services at SDC facilities over contract period	N/A
Total projected payment to the Council inclusive of charges for services at SDC facilities over contract period	-£22,437.00
<b>Schedule 2.5</b>	
Sum payable to Council on transfer of commercial details	£0.00
<b>Compliance</b>	
Method statement	Confirmed compliance with all requirements of specification
Service Hours	Yes
Houly appointment slots and first & last appointments	Yes
Visit return interval 7-12 days	Yes
Extent of Service incl. statement of customer concessions	Yes
Service Centre provision	Yes
Provider complaints handling & resoluion	Yes
Price schedules	Yes
Free telephone advice - 1 to 2 calls each day	Yes
Free pest identification - one insect per week	Yes

# Pest Control Services Quotation Evaluation - June 2014

## Agenda Item

<b>Suppliers Name:</b>	<b>Noah's Ark Environmental Services Ltd.</b>
	67 Berry Lane, Wootton, Northampton, NN4 6JU Submitted by Catherine and Jonathon Cook
<b>Tender Requirements</b>	
<b>Price - Schedule 2.1 - Note all prices exclude VAT</b>	
Standard Charges to Customers - 1st year	No Access £10, Advice £20, Wasps £45, Add wasps £15, Survey £20, Rats £90, Mice £90, R & M £115, Bed-bugs £145, Fleas £100, C/roaches £165, Squirrels £130, Ants or flies £90
Concessionary Charges to Customers - 1st year	No Access £5, Advice £5, Wasps £30, Add wasps £10, Survey £5, Rats £65, Mice £65, R & M £95, Bed-bugs £100, Fleas £70, C/roaches £130, Squirrels £98, Ants or flies £80
Projected primary pest treatment costs, excluding VAT, at standard charge to customers in first year assuming 10 year average treatment numbers.	Rats £90 x 100, Mice £90 x 92, Wasps £45 x 597 £44,145.00
Projected primary pest treatment costs, excluding VAT, at concessionary charge to customers in first year assuming 10 year average treatment numbers.	Rats £65 x 41, Mice £65 x 35, Wasps £30 x 89 £7,610.00
<b>Schedule 2.2</b>	
Annual Standard Charge to Council - 1st year	£10,800.00
Annual Concessionary Charge to Council - 1st year	£3,400.00
Annual Standard Payment to Council - 1st year	£0.00
Individual supplementary charge/treatment to Council	Not scheduled
Individual supplementary payment/treatment to Council	Not scheduled
Projected primary pest treatment income at standard payment to Council in first year assuming 10 year average treatment numbers.	Not scheduled £0.00
Individual supplementary charge/concessionary treatment	Not scheduled
<b>Schedule 2.3</b>	
Charges for Pest Control services at SDC facilities	Rodents Dunbrik £110, Hollybush £110, Bradbourne £100, Wasps £35, Advice to SDC EP £20/hour
Projected overall annual cost to Council in first year assuming scheduled treatment frequencies.	Rodents Dunbrik £110 x 8, Hollybush £110 x 8, Bradbourne £100 x 7, Wasps £35 x 6, Advice to SDC EP £20/hour x 6 hours (estimated) £2,790.00
<b>Schedule 2.4</b>	
Charge to Council - 2nd year	£14,342.00
Payment to Council - 2nd year	£0.00
Charge to Council - 3rd year	£14,628.84
Payment to Council - 3rd year	£0.00
Total projected charge to the Council inclusive of charges for services at SDC facilities over contract period	£48,253.00
Total projected payment to the Council inclusive of charges for services at SDC facilities over contract period	N/A
<b>Schedule 2.5</b>	
Sum payable to Council on transfer of commercial details	£1,500.00
<b>Compliance</b>	
Method statement	Confirmed compliance with all requirements of specification
Service Hours	Yes
Houly appointment slots and first & last appointments	Yes
Visit return interval 7-12 days	Yes
Extent of Service incl. statement of customer concessions	Yes
Service Centre provision	Yes
Provider complaints handling & resoluion	Yes
Price schedules	Yes
Free telephone advice - 1 to 2 calls each day	Yes
Free pest identification - one insect per week	Yes

**Pest Control Services Quotation Evaluation - June 2014**

Agenda Item

<i>Suppliers Name:</i>	<b>Sevenoaks Direct Services</b>
Provision of accommodation & facilities	Yes
Baits & Poisons - Up to date Register & safe storage	Yes
Provision of equipment	Yes
Communication - provision of contract details	Yes
Transport provision	Yes
Protective clothing	Yes
Business continuity	Yes
Record keeping & Treatment sheets	Yes
Service standards & Monitoring	Yes
Payment arrangements	Yes
<b>Technical Merit &amp; Quality Factors</b>	
Company details	Local Authority and in-house service provider
Local area knowledge	Excellent first hand knowledge of Sevenoaks District area
Evidence of Customer focus - Complaints Handling	Compliant with all SDC requirements
Financial Standing	Local Authority funded
Technical capacity and ability - references	24 hour contact either through day time contact centre or out of hours control room call handling. PCO's have 50 years combined experienced. PCO's contact customers, assess requirements and site conditions and arrange appointments directly ensuring expectations are met. Data records for performance monitoring maintained - High quality in-house service well regarded by Council Members and senior managers, with very high customer satisfaction and complimentary feedback
Equalities	Equality, diversity and inclusion policies in place.
Health and Safety Record	No investigations, improvements or prohibitions relevant to Pest Control
Sustainability - Environmental Policy ISO 14001?	Yes but not ISO 14001 accredited
Training provision	IIP Choices Gold - PCO's have BPCA Levels 1 & 2, ATB foundation module & CPC's in wildlife management, safe handling of pesticides and Pest control management. Training plan and PDP for refresher training
Contract Support Costs	None - In house service provision
Additional services offered	N/A
<b>Information Supplied</b>	
Accounts	Local Authority - Relevant trading accounts information provided
Insurance - Employers, Public Liability & Prof. Indemnity	Insurance levels recorded and current certificates provided
Health & Safety Policy, Risk & COSHH Assessments	Provided Policy, Risk Assessment includes ref. to COSHH
Bankers reference authorised and letter supplied?	N/A - Local Authority in-house provider
Confirmation of no bankruptcy?	Local Authority - No Bankruptcy allowed
H & S Advisor - C.V.	Not provided - Council employees of known competency
Other information	-
<b>Acceptance of Contract Conditions</b>	
Service delivery from 1st October?	Yes
Acceptance of Formal contract agreement?	N/A in-house service provider
Acceptance of TUPE provisions?	N/A in-house service provider
<b>Completeness of Response</b>	
<b>Assessed completeness of response</b>	
Form of Quotation signed by authorised party?	Yes
Bona Fide Certificate signed?	Yes
Quotation valid for 90 days?	Yes
Questionnaire information and signed undertaking?	Yes
<b>Assessed capability to support all contract elements</b>	
Guarantee by Parent Company offered?	N/A - Local Authority in-house provider
Claims under Firm's Professional Indemnity?	No

# Pest Control Services Quotation Evaluation - June 2014

## Agenda Item

<i>Suppliers Name:</i>	<b>MITIE Pest Control</b>
Provision of accommodation & facilities	Yes
Baits & Poisons - Up to date Register & safe storage	Yes
Provision of equipment	Yes
Communication - provision of contract details	Yes
Transport provision	Yes
Protective clothing	Yes
Business continuity	Yes
Record keeping & Treatment sheets	Yes
Service standards & Monitoring	Yes
Payment arrangements	Yes
<b>Technical Merit &amp; Quality Factors</b>	
Company details	Part of MITIE Group PLC since 2003 - rapid growth over last 7 years. Target to double turnover in next 5 years. Plan to aggressively compete to increase Local Authority clients
Local area knowledge	Dartford office and contracts with Maidstone and Swale Borough Councils
Evidence of Customer focus - Complaints Handling	24 hr helpdesk, PDA equipped operatives, Complaints guidelines,
Financial Standing	Accounts provided - from £10 to £15 million in last 4 years
Technical capacity and ability - references	National 24 hour '0844' helpdesk number. Pest Control turnover in the region of £15 million. One of the largest UK operations with 258 employees split over 3 regions and spread over 14 geographic areas. Service manager and six technicians currently working in Kent. Will train TUPE staff on PDA use and central database will allow call-outs and job completions in 'real time'. Innovation includes thermal imaging and a sniffer dog to locate mouse infestation. Client access to e-pest data via secure website using unique username and password.
Equalities	Equality, diversity and inclusion policy in place.
Health and Safety Record	No investigations, improvements or prohibitions relevant to Pest Control
Sustainability - Environmental Policy ISO 14001?	Yes ISO 14001 accredited
Training provision	Operational staff qualified to BPCA standard (Query Level 1 or 2?). Induction, probation and refresher training provided across a range of general health and safety topics.
Contract Support Costs	Yes - significant costs - see separate sheet
Additional services offered	Proofing works undertaken by technicians and materials carried on vans
<b>Information Supplied</b>	
Accounts	3 years accounts for company, parent and sister companys provided.
Insurance - Employers, Public Liability & Prof. Indemnity	Insurance levels recorded and current certificates provided
Health & Safety Policy, Risk & COSHH Assessments	ISO 18001 H&S standard, Policy, Risk Assessment includes ref. to COSHH
Bankers reference authorised and letter supplied?	No
Confirmation of no bankruptcy?	Yes
H & S Advisor - C.V.	Yes
Other information	Ethical business policy, Procurement code of conduct and policy
<b>Acceptance of Contract Conditions</b>	
Service delivery from 1st October?	Yes
Acceptance of Formal contract agreement?	Yes
Acceptance of TUPE provisions?	Yes
<b>Completeness of Response</b>	
<b>Assessed completeness of response</b>	
Form of Quotation signed by authorised party?	Yes
Bona Fide Certificate signed?	Yes
Quotation valid for 90 days?	Yes
Questionnaire information and signed undertaking?	Yes
<b>Assessed capability to support all contract elements</b>	
Guarantee by Parent Company offered?	Yes
Claims under Firm's Professional Indemnity?	No

**Pest Control Services Quotation Evaluation - June 2014**

Agenda Item

<i>Suppliers Name:</i>	<b>Noah's Ark Environmental Services Ltd.</b>
Provision of accommodation & facilities	No operating base specified
Baits & Poisons - Up to date Register & safe storage	Yes
Provision of equipment	Yes
Communication - provision of contract details	Yes
Transport provision	Yes
Protective clothing	Yes
Business continuity	Yes - limited provision evident
Record keeping & Treatment sheets	Yes
Service standards & Monitoring	Yes
Payment arrangements	Yes
<b>Technical Merit &amp; Quality Factors</b>	
Company details	Northampton based company providing principal activity of stray dog collection and kennelling along with pest control services (started in 2008) to Council and private sector clients.
Local area knowledge	Work for London Borough of Newham - no local knowledge apparent
Evidence of Customer focus - Complaints Handling	Customer service excellence certificate & complaints policy/procedure
Financial Standing	Company turnover from £298k to 418k over 3 years with limited reserves
Technical capacity and ability - references	24 hour contact either directly to office in work hours or to sub-contracted out of hours call centre. Also fast response 15 minute call back request via company website. PCO's contact customers to assess requirements and site conditions and arrange appointments directly. Data records for performance monitoring maintained. Customer surveys for quarterly feedback.
Equalities	Equality, diversity and inclusion policy in place.
Health and Safety Record	No investigations, improvements or prohibitions relevant to Pest Control
Sustainability - Environmental Policy ISO 14001?	Yes but not ISO 14001 accredited
Training provision	Operational staff qualified to BPCA standard Level 2. Induction and probation training provided across a range of service specific and health and safety topics.
Contract Support Costs	Yes - some costs - see separate sheet
Additional services offered	Company undertakes stray dog collection and kenelling for other clients
<b>Information Supplied</b>	
Accounts	3 years accounts for company provided.
Insurance - Employers, Public Liability & Prof. Indemnity	Insurance levels and certificates provided - <b>No Professional Indemnity</b>
Health & Safety Policy, Risk & COSHH Assessments	Provided Policy, Risk Assessment includes ref. to COSHH
Bankers reference authorised and letter supplied?	Yes
Confirmation of no bankruptcy?	Yes
H & S Advisor - C.V.	M. D. supported by outside H & S specialist consultants - M.D. CV - Basic
Other information	
<b>Acceptance of Contract Conditions</b>	
Service delivery from 1st October?	Yes
Acceptance of Formal contract agreement?	Yes
Acceptance of TUPE provisions?	Yes
<b>Completeness of Response</b>	
<b>Assessed completeness of response</b>	
Form of Quotation signed by authorised party?	Yes
Bona Fide Certificate signed?	Yes
Quotation valid for 90 days?	Yes
Questionnaire information and signed undertaking?	Yes
<b>Assessed capability to support all contract elements</b>	
Guarantee by Parent Company offered?	None
Claims under Firm's Professional Indemnity?	<b>None - No Professional Indemnity insurance cover</b>

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## Pest Control Service Quotation Evaluation - June 2014

<b>Quotations Score Summary</b>				
Price Evaluation Criteria	Score Weighting %	Maximum Score	Score Awarded	MEAT Ranking
<b>Sevenoaks Direct Services</b>				
Price - Schedule 2.1	60	60	35	1
Price - Schedule 2.2		33	22	
Price - Schedule 2.3		30	30	
Price - Schedule 2.4		30	20	
Price - Schedule 2.5		30	0	
Compliance	40	15	15	
Technical Merit & Quality Factors		60	59	
Information Supplied		20	20	
Acceptance of Contract Conditions		9	9	
Completeness of Response		18	18	
	100	305	228	75%
<b>MITIE Pest Control</b>				
Price - Schedule 2.1	60	60	38	2
Price - Schedule 2.2		33	33	
Price - Schedule 2.3		30	20	
Price - Schedule 2.4		30	30	
Price - Schedule 2.5		30	0	
Compliance	40	15	15	
Technical Merit & Quality Factors		60	47	
Information Supplied		20	16	
Acceptance of Contract Conditions		9	9	
Completeness of Response		18	18	
	100	305	226	74%
<b>Noah's Ark Environmental Services</b>				
Price - Schedule 2.1	60	60	53	3
Price - Schedule 2.2		33	11	
Price - Schedule 2.3		30	10	
Price - Schedule 2.4		30	10	
Price - Schedule 2.5		30	30	
Compliance	40	15	12	
Technical Merit & Quality Factors		60	38	
Information Supplied		20	18	
Acceptance of Contract Conditions		9	9	
Completeness of Response		18	12	
	100	305	203	67%

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