SHEPWAY CORE STRATEGY PROPOSED SUBMISSION DOCUMENT, JULY 2011

Further Representations on Policy CSD9

On behalf of

THE BUCKNELL TRUST

CgMs Ref: KJ/13269

Date: 12 April 2012
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1.0 FURTHER COMMENTARY

1.1 I act on behalf of the Bucknell Trust (The Trust), owners of approximately 18.96 ha (49.32 acres) of freehold land at Sellindge.

1.2 I have already produced a comprehensive assessment of The Trust’s land (representations submitted on 21 September 2011 – Policy CSD9) and highlighted the fact that The Trust itself is a long-standing local family who have retained local connections in Sellindge. They understand the village, its needs and have a long-term commitment to producing a community legacy.

1.3 I rely on these representations in full and reiterate my conclusion that draft Core Policy CSD9 is not sound as it is not justified or consistent with national policy. The main factor in determining this position is that the evidence base for this Policy is so variable, and at times untrustworthy, that there can be no assurances that any land can be delivered for housing in Sellindge.

1.4 I reiterate on behalf of The Trust that they remain fully prepared to engage with St Katherine’s on the identified ‘core area’ in CSD9 to explore the feasibility for providing a village green / other facilities on their land in conjunction with development on theirs.

1.5 However, we continue to robustly contend that The Trust’s land is the only land that can be demonstrated to be deliverable and therefore, unless it is proven otherwise, the Core Strategy should identify the eastern zone as a preferred location.

1.6 I have noted the questions that the Inspector will be focusing his discussion on at the EIP in relation to ‘Areas of Strategic Change’ (including Policy CSD9), particularly in terms of the questions at 5.1 and 5.2 (from Inspector’s Matters, Issues and Questions).

1.7 These questions ask whether the identification of ‘broad locations’ for development prejudice the consideration of detailed sites in future DPDs and whether it is clear how these sites will be taken forward in forthcoming DPDs.
Further Representations to Shepway Core Strategy

The Buckn nell Trust

(5.1). It also asks whether the detail of the development’s proposed in the policies are adequately justified by the evidence base and why other sites being promoted have been discounted (5.2). I consider these questions to be highly relevant to the case that I put forward on behalf of The Trust in my earlier representations.

1.8 Whilst The Trust’s site (to the east of the village) could be broadly seen to have been ‘allocated’ within the draft Policy CSD9, its future role in promoting sustainable development in the settlement is severely fettered by the loose construction of the wording of the policy and the lack of consideration to the ability of the ‘core area’ to achieve delivery of housing and other development.

1.9 There are considerable concerns regarding the availability and deliverability of the core area, north and west locations. The fact that this uncertain position underpins a Core Strategy policy which protects development in a certain area (i.e the ‘core’ location) means that there is obvious prejudice caused to much needed development land coming forward in the future. Under the current wording of the policy The Trust’s land, which meets the recognised tests of being available, suitable and achievable, is likely to be considered unacceptable by the Council in isolation even if the core area land is not capable of being brought forward.

1.10 The Trust’s site can work well independently of the ‘core area’ and still fulfil the requirements of this policy in terms of land use. The Trust has continued to work alongside local architects Guy Holloway in constantly testing the feasibility of different options for its land.

1.11 I have attached an indicative proposed outline layout (dated 11.04.2012) to this statement (Appendix 1) produced by Guy Holloway Architects. This is a very illustrative masterplan and we fully appreciate the need for a proper and appropriate masterplan exercise to be carried out with the full engagement of the community and other stakeholders.

1.12 The masterplan exercise is purely to show an illustrated possible layout plan and a very rough idea of a site capacity in terms of residential homes. It demonstrates the suitability of the site in simple land use planning terms for the inclusion of a
new village green, in addition to other potential facilities (e.g. foodstore and commercial units).

1.13 In summary, I firmly recommend that Core Strategy Policy CSD9 should be amended to enable the Trust’s land to be identified as the ‘core location’ or at least an area on which a certain amount of land could be brought forward for much-needed development without the need for the delivery to be tied to other land that does not appear, through the evidence submitted, to be capable of delivery.

1.14 I look forward to expanding on these points in more detail at the Examination in Public.
Appendix 1 – Indicative Proposed Outline Layout
**Sellindge Masterplan: Proposed Outline Layout - 11.04.12**

- **INDICATIVE SITE LAYOUT (Not To Scale)**

- **Sellindge Strategy: Core Development Area**
  - Potential Employment
  - New Roundabout
  - Larger Convenience Store
  - Green Buffer Zone
  - Green Buffer Zone
  - Pedestrian Access Only
  - Pedestrian & Emergency Vehicle Access

- **Indicative Schedule Of Accommodation**
  - Phase 1: 50 Units
  - Phase 2: 25 Units
  - Phase 3: 25 Units
  - Phase 4: 25 Units
  - Phase 5: 25 Units
  - Total: 120 - 150 Units

- **New Village Green**
- **Informal Recreation Area**
- **B1 Parking**
- **P1**
- **P2**
- **P3**
- **P4**
- **P5**

- Larger Convenience Store
  - 6 - 8 No. B1 Commercial Units @ 600sqm each

- Communal Parking For Recreational Area