

Core Strategy Review - Inspectors' Action Points

**Matter 7b – Sellindge Strategy - Policy CSD9:
Sellindge Strategy**

11 February 2021



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Matter 7b – Sellindge Strategy – Policy

CSD9: Sellindge Strategy

1. Introduction

1.1. During the hearing session for Matter 7b, Sellindge Strategy, the council undertook to:

- Give consideration to the Policies Map and the inclusion of Barrowhill in the new garden settlement site boundary;
- Produce a note setting out the basis for specific infrastructure requirements in phase two of Policy CSD9;
- Produce a note explaining the current and proposed approach to the Community Infrastructure Levy insofar as it relates to the sites allocated in Policy CSD9;
- Give consideration to the basic approach of Policy CSD9, insofar as it identifies a broad location yet also identifies specific sites with detailed policy requirements, and the implications for the Policies Map of having broad locations outside the settlement boundary; and
- Review the wording of Policy CSD9 and suggest modifications to:
 - Delete references and requirements related to phase one development and make consequential amendments to policy wording;
 - Amend reference to the requirement for water efficiency of 90 litres per person per day to 110 litres per person per day;
 - Amend reference to 1.5 forms of entry primary school;

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- Provide more flexibility as to how additional medical facilities could be provided;
- Provide more clarity on landscaping requirements and impact on the setting of the Kent Downs Area of Outstanding Natural Beauty (points 2 g. and 3 h. in particular); and
- Provide clear references to the nutrient enrichment issue and potential solutions and mitigation.

1.2. In response to these points:

- Information is provided in the sections 2 to 6 that follow;
- Proposed modifications to Policy CSD9: Sellindge Strategy are set out in Appendix 1, with additions and deletions highlighted; and
- Policy CSD9 is set out in Appendix 2 with deletions and additions not marked up, to show how it would read if the proposed main modifications are incorporated.

2. Consideration of the Policies Map and Inclusion of Barrowhill in the New Garden Settlement Site Boundary

Introduction

- 2.1 The council undertook to give consideration to the Policies Map and inclusion of Barrowhill in the new garden settlement site boundary.
- 2.2 Sellindge is dispersed in character, consisting of a series of neighbourhoods that have developed along, or just off, the A20. Barrowhill forms one of these neighbourhoods and is located just to the south east of the village.
- 2.3 From historic mapping¹, Barrowhill appears to have developed shortly after the introduction of the original railway line, but, as transport routes developed over time along this route, with the M20 and the High Speed 1, this has created a physical barrier between the two neighbourhoods.
- 2.4 Despite this barrier, Barrowhill is considered part of the wider village (it is within the parish). Representations received have emphasised this when the district council published the Regulation 18 draft of the Core Strategy Review. Comments received (see EB 01.60 relating to paragraph 5.149 and 1.150) indicated that local people considered that Barrowhill was very much part of Sellindge. (The district council amended supporting text and Figure 5.7 to reflect this for the Regulation 19 draft.)

Policies CSD9 and SS6-SS9

- 2.5 Policy CSD9 deals with the future development of Sellindge. The main focus of this policy is to provide new homes (together with the necessary infrastructure), focused around the new centre of the village. Whilst the policy seeks infrastructure provision, such as traffic calming, cycle ways and the

¹ <https://webapps.kent.gov.uk/KCC.KLIS.Web.Sites.Public/Default.aspx>

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school expansion (which would benefit the residents of Barrowhill) the policy primarily relates to the area north of the M20 and railway lines.

- 2.6 Policies SS6-SS9 deal with the many considerations relating to the new garden settlement. The boundary of Policy SS6 is set out in Figure 4.5 and this includes Barrowhill. This figure sets out where possible development would be located and this includes ‘mixed development’ and ‘neighbourhoods with landscape mitigation’ close to or adjacent to Barrowhill. Further work in the Joint Delivery Statement illustrates how Barrowhill has been considered in the overall scheme, including where open space should be provided to mitigate development.

Conclusion

- 2.7 In conclusion, the council considers that, whilst Barrowhill is considered to be historically part of Sellindge, which has not changed, for practical planning purposes it should be included within the scope of the new garden settlement where Policies SS6-SS9 apply. This is to ensure that any future development takes full consideration of the existing development and community at Barrowhill.

3. Evidence for Infrastructure Provision in Policy CSD9

Introduction

- 3.1 During the hearing session on Friday 8 January 2021 for Matter 7b, Sellindge Strategy, the Inspectors asked the council to produce a note setting out the evidence base for specific infrastructure requirements for phase two of Policy CSD9.
- 3.2 The commentary in this section is based on the policy set out in the Submission Draft (Regulation 19); Section 5 and Appendices 1 and 2 of this note consider and set out the proposed amendments to CSD9.
- 3.3 Policy CSD9 consists of three sections. The first two sections set out the first two phases of development. The first phase is essentially the adopted Core Strategy 2013 policy, which sets out a broad location, creating a centre to the village. Planning permission has been granted for this and development is proceeding with construction well underway. As discussed at the hearing session, this part of the policy is proposed to be deleted due to the advanced stage in development.
- 3.4 The second phase identifies two new areas of land for development, which extend the original broad location to the west (Area A) and east (Area B).
- 3.5 Policy CSD9 sets out criteria for Areas A and B which are sought to ensure the timely provision of facilities and infrastructure for the new development and local residents.
- 3.6 The third section of the policy sets out criteria with requirements for both phases.

Policy CSD9 part 2 criteria and relevant evidence base

- 3.7 There are six criteria set out in the second part of the policy.
- 3.8 The **first criterion** states:

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“The residential development should not commence until the school, doctors surgery and Parish Council administrative accommodation to be provided by phase 1 are under construction with a programmed completion date”.

3.9 This was intended to ensure that the infrastructure that was considered necessary for the first phase had been implemented or secured through legal agreement. Concerns were raised by the Parish Council and local residents regarding the risk that further new dwellings would be built before the provision of the improvements to the village’s infrastructure.

3.10 The **second criterion** relates to the amount of affordable homes that should be provided. This states:

“Total residential development within phase 2 of approximately 350 dwellings (Classes C2 and C3) with 22 per cent affordable housing subject to viability and a minimum of 10 per cent of dwellings designed to meet the needs of the ageing population;”

3.11 The requirement for approximately 350 dwellings takes account of the proposed figure from the approved planning application on Area B (land east of phase one) and approximate figure of 20 dwellings per hectare on Area A (land to the west of phase one), based on the work carried out in the Growth Options Study Phase 2 Report (EB 04.21). The affordable housing requirement reflects the requirement set out in Policy CSD1: Balanced Neighbourhoods, which was based on the evidence set out in the SHMA part 2 (EB 03.30). The 10 per cent requirement is also from this document. (See also the council’s response to Matter 9, Points 2 and 5, document EX066.)

3.12 **Criterion 2 c.** seeks the provision of self-build or custom-build dwellings as part of the development. To ensure that opportunities are provided for individuals and groups on the self-build register (currently 240 people) the council is seeking an element of self-build or custom-build on new developments to meet this demand. Following the discussion at the hearing it is proposed to delete this element of Policy CSD9 as the self-build and custom-

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build requirement is already set out in Places and Policies Local Plan (PPLP) Policy HB4 (suggested modifications are set out in Appendix 1 to this note).

3.13 **Criterion 2 d.** considers the water usage standard. This states:

“Development shall be designed to minimise water usage, as required by the Water Cycle Study. Total water use per dwelling shall not exceed 90 litres per person per day of potable water (including external water use);”

3.14 This criterion was added as the district has been identified as a water-stressed area and the 90 litres per person per day reflected the other broad location requirements in the plan.

3.15 There are particular issues in the Sellindge area relating to nitrogen and phosphorous discharge, and reducing the water usage would help reduce the severity of the problem, as Natural England suggests in its comments on this issue; Natural England proposes that the standard should be 100 litres per person per day². However, it is acknowledged that the standard of 110 litres should replace that of the 90 litres per person per day as this is the most stringent standard allowed for in government guidance (see also the council’s response to Matter 11, Policy CSD5, document EX075).

3.16 **Criterion 2 e.** sets out the requirement for energy efficiency standards to be agreed with the local planning authority that meet or exceed prevailing best practice. This requirement reflects PPLP Policy CC1: Reducing Carbon Emissions.

3.17 On reflection, following the hearing session, it is suggested that this criterion is not necessary, as Policy CC1 would ensure that energy matters are considered in any proposals that may come forward (suggested modifications are set out in Appendix 1 below).

3.18 **Criterion 2 f.** sets out the necessary local community facilities that would need to be provided. The council has worked closely with a wide range of

² Paragraph 5.10 of Natural England’s submission for Matter 7 (ID 1042876(6))

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infrastructure providers, held duty to-cooperate meetings with statutory consultees, and wider engagement with the Parish Council and local community to best understand the level of supporting infrastructure, services and facilities required alongside the new housing, to ensure the sustainability of the development. The Council has also commissioned supporting studies as part of the supporting evidence base to the Core Strategy Review. The sub-criteria are as follows :

- i. *Provision of land and funding to upgrade Sellindge Primary school to 2 forms of entry (2FE).* This was a requirement identified through discussions with Kent County Council’s Education Service. This was updated just before the examination hearings to 1.5 FE (KCC letter FHDC EX020).
- ii. *Provision of new or upgraded sports grounds, open and play space or upgraded facilities in the village.* The District Council commissioned Ploszajski Lynch Consulting Ltd. (PLC) to prepare a Playing Pitch Strategy (PPS) for the district (document EB 05.30). This is part of a wider assessment of sport and leisure provision in the district which also includes a Sports Facilities Strategy (document EB 05.40). The aim of the PPS is to undertake an assessment of playing pitches and the future need for provision, driven by increased population and to identify any gaps in the existing network of provision. Expanded analysis and commentary on the requirement for provision of new or upgraded sports grounds to serve Sellindge is set out in Appendix 4. The requirement for open space and play space provision is as set out in PPLP Policies C3 and C4 respectively. (It is suggested that it would be clearer if this sub-criteria was deleted as Policy C3 would be used to secure the contributions.) Given the size and scale of each of the two site areas it is expected that provision for open space and play space will be provided as an on-site requirement.
- iii. *Provision of new nursery facilities.* This was identified through discussions with the Parish Council. It was considered important for balanced and sustainable communities as there was no nursery provision in the village.

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(Changes are proposed to clarify as and when this should come forward; see Appendix 1 below.)

- iv. *Provision of a replacement village hall, to a specification to meet local need.* This requirement was again identified through discussions with the Parish Council. It is understood that the current hall is coming towards the end of its useful life and would need replacing. Supporting evidence for the need for a community facility is also provided in the Sports Facilities Strategy (document EB 05.40). The aim of the Sports Facilities Strategy is to undertake a needs and opportunities assessment for indoor and outdoor sports facilities and future need for provision, driven by increased population and to identify any gaps in the existing facility network. (Changes are proposed to clarify this criterion as to when this should come forward; see Appendix 1 below.) Expanded analysis and commentary on the requirement for provision of new or upgraded community facilities to serve Sellindge is set out in Appendix 5.
- v. *Provision of new allotment facilities.* This requirement was based on the discussions with Kent County Council for the Infrastructure Delivery Plan (EB 05.10) and the requirement set out in PPLP Policy C3: Open Space. The council also supports the provision of allotments through Policy HW3: Supporting Healthy Lifestyles. The Parish Council also supported allotments in the planning application Y16/1122/SH to the east of the village. (It is suggested that it would be clearer if this sub-criterion was deleted as PPLP Policy C3 would be used to secure the contributions.)
- vi. *Contributions to the upgrading of local medical facilities to meet the needs of the development.* This was based on the discussions with infrastructure providers for the Infrastructure Delivery Plan (EB 05.10, Section 4). Expanded analysis and commentary on the requirement for provision of new or upgraded healthcare facilities to serve Sellindge is set out in Appendix 6.

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- 3.19 **Criterion 2 g.** sets out the landscape requirements for Areas A and B, to help retain the rural character and mitigate any possible impact on the Kent Downs Area of Outstanding Natural Beauty (AONB). All landscaping shall be planted at an early stage of the development and provide new habitats for priority nature conservation species.
- 3.20 Although the Growth Options Study Phase 2 report indicates that Area A is well-concealed in views from the Kent Downs AONB³ a requirement for landscaping was included to ensure integration of the new development into the wider countryside, particularly along the western boundary of the new development. The Growth Options work recognises the importance of softening the urban edge. Area B had a slightly greater impact on the AONB and required further mitigation (this also reflected the planning application Y16/1122/SH). This was added to the policy after consultation with stakeholders including the Kent Downs AONB Unit. The matter of additional landscaping was also raised by the Kent Downs AONB Unit during the Regulation 18 consultation and in the Unit’s comments on the planning application.
- 3.21 **Criterion 2 h.** seeks an improved pedestrian and cycle access along the northern boundary of the development area to the east (Public Right of Way HE273). This route is just north of the landscape area identified on Figure 5.7. This requirement reflects the need for good design, which ensures connectivity and movement within the new development and beyond its boundaries to existing facilities. Whilst Kent County Council’s Public Rights of Way Unit supported improvements, it is considered that reference to specific rights of way is not appropriate in the context of an allocation for a ‘broad location’. Modifications are therefore suggested to this criterion in Appendix 1 below.
- 3.22 **Criterion 2 i.** seeks approximately 1,000sqm of business (B1 Class) floorspace to be provided, achieving BREEAM ‘outstanding’ rating. The amount of employment space reflects the proposal in the planning application

³ ‘By a combination of undulating surrounding landform, intervening development at Sellindge, and woodland or tree belts on its northern, eastern and southern edge’.

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(Y16/1122/SH). However, it is proposed to modify Policy CSD5 to indicate that new non-residential development should achieve BREEAM ‘excellent’ standard (see council’s response to Matter 11, Policy CSD5, document EX075); it is therefore proposed that Policy CSD9 should be modified to reflect the amended requirement in Policy CSD5.

- 3.23 **Criterion 2 j.** seeks a masterplanned approach to land within Area A land to the west of Sellindge in Phase 2 and the full area included in a single outline application. The masterplan must include consideration for the setting of non-designated built and natural heritage assets such as Grove House and Potten Farm. This was intended to ensure that the overall development takes into account the mitigation required for infrastructure and heritage in accordance with the National Planning Policy Framework and PPLP Policy HE2: Archaeology. The importance of the natural and built heritage assets within the area was highlighted in the Folkestone & Hythe Historic Environment Assessment (EB 02.30).
- 3.24 **Criterion 2 k.** states that any archaeological remains found should be evaluated and the potential impact of development mitigated in accordance with PPLP Policy HE2. The importance of the heritage assets was highlighted in the Folkestone & Hythe Historic Environment Assessment (EB 02.30) (this also included a potential aircraft crash site). Amendments are suggested to the policy and supporting text in Appendix 1 below.

Policy CSD9 part 3 criteria and relevant evidence base

- 3.25 The **third part** of the policy sets out the requirements for both phases of the development.
- 3.26 **Criterion 3 a.** seeks to provide, wherever possible, internal links within the areas themselves and external links to neighbouring sites to ensure there is ease of access by a range of transport modes to new and existing development and facilities within the village. This criterion was added to ensure that any developments were permeable and reduced the reliance on the car. The criterion was also added in response to comments during the Regulation 18

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consultation from Kent County Council and is supported by the National Design Guide, which can be used by all those involved in shaping places including in plan-making.

- 3.27 **Criterion 3 b.** requires the delivery of pedestrian and cycle enhancements to the A20 through (as a minimum) informal traffic-calming features at key locations, and perceived narrowing of the carriageway outside Sellindge primary school and associated highways improvement. Phase 2 is intended to extend the highways improvement area to be delivered by Phase 1. This was carried over from the original 2013 policy and so will need to be updated. The requirement to extend this in Phase 2 was added to reflect the issues raised by Kent County Council’s Highways Team (which the county council supported during the Regulation 18 consultation).
- 3.28 **Criterion 3 c.** seeks contributions towards the provision of a safe, lit, surfaced cycle and pedestrian access to Westenhanger Station from Sellindge through the upgrade of existing bridleways and public rights of way (HE271A and HE274). Following early discussions with the Parish Council, this was to ensure a safe route for local residents from Sellindge to the station and was supported by Kent County Council during the Regulation 18 consultation. However, as indicated above in relation to other Public Rights of Way, reference to specific routes is considered unsuitable for a policy for a broad location and it is suggested that this criterion is modified.
- 3.29 **Criterion 3 d.** seeks the provision of noise and air pollution mitigation measures such as distance buffers between the M20/High Speed 1 transport corridor and the development, as well as landscaping within the buffers designed to integrate with other planting and habitat creation delivered through the comprehensive masterplan. This was identified in the Sustainability Appraisal as an important requirement (EB 02.40). This also reflects the objectives of providing green infrastructure and improving habitats as set out in Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation and PPLP Policies NE1: Enhancing and Managing Access to the Natural Environment and NE2: Biodiversity.

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- 3.30 **Criteria 3 e., f. and g.** all relate to wastewater and sewerage.
- 3.31 **Criterion 3 e.** was carried over from the original policy whilst **3 f.** and **3 g.** were introduced following representations made by Southern Water at Regulation 18 consultation. Additional text is proposed to reference the revised Policy CSD5, drafted with Natural England, regarding the issue of nitrogen and phosphorous discharge.
- 3.32 **Criterion 3 h.** ensures a high standard of design, siting and layout of development to reflect the proximity of Areas A and B to the Kent Downs AONB. The inclusion of this criterion was to mitigate any detrimental impact on the setting of the AONB. As it is proposed to strengthen the criterion relating to landscaping and woodland planting (currently numbered 2 g.), it is suggested that criterion 3 h. could be deleted.

4. Current and Proposed Approach to CIL and Policy CSD9

Introduction

- 4.1 The council undertook to produce a note explaining the current and proposed approach to the Community Infrastructure Levy (CIL) as it relates to Policy CSD9 sites.

Background

- 4.2 The council adopted a Community Infrastructure Levy (CIL) Charging Schedule on 20 July 2016, and CIL has been in operation from 1 August 2016. The different types of infrastructure to be funded from CIL and from site-specific planning obligations are set out in the council’s Regulation 123 List (June 2016).
- 4.3 The 2016 Charging Schedule was supported by an area-wide assessment, ‘Shepway District Council Proposed Community Infrastructure Levy Supplementary Report – Viability’, prepared by Dixon Searle, which tested the viability of a number of hypothetical sites from across the district on behalf of the council.
- 4.4 As detailed within the Charging Schedule (June 2016), the council concluded that the infrastructure requirements of a number of Strategic and Key Development Sites, including the Sellindge broad location, would be more appropriately addressed and delivered through the use of Section 106 legal agreements and not CIL, given their scale and stage in the planning process.
- 4.5 As drawn from the Inspector’s Report into the CIL Charging Schedule:
- “There are four ‘Strategic & Key Development Sites’ identified in CIL Table 3 and shown on the submitted CIL Schedule Appendix 4 Maps, which are all adopted local plan proposals.*

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...

- *Core Strategy Policy CSD9, for strategic redevelopment at Sellindge.*

All development within these sites is proposed to be charged with a rate of £0 / sq m and infrastructure funding is intended to be achieved through planning obligations under section 106 of the Town & Country Planning Act 1990 (as amended).”

- 4.6 The site allocation referred to as Phase 1 ‘Land adjacent to the surgery, Main Road’ Sellindge that formed a broad location for development in the adopted Core Strategy 2013 has therefore been subject to a CIL rate of £0 / sq m.

Site allocations at Sellindge in Policy CSD9 of the Core Strategy Review

- 4.7 As part of the Core Strategy Review, the further expansion of Sellindge has been proposed as a broad location across two sites (Areas A and B). Therefore the question of whether the new development could reasonably support the payment of CIL in light of the infrastructure demand and the associated capital cost of infrastructure provision has been investigated through the evidence set out in the CIL Charging Schedule Review Viability Report (BPS, June 2019) (document EB 03.71).
- 4.8 The findings of this report were that:

“With respect to the two Sellindge sites to be allocated as Phase 2 housing under Policy CSD9, our viability testing indicates that the two sites in question will not be in a position to make CIL contributions alongside the implementation of policy compliant schemes that will ensure delivery of the critical infrastructure specified within policy CSD9 through the S106 legal mechanism. Our assessment includes a bespoke estimate of infrastructure costs, based on the infrastructure requirements set out in the ‘Sellindge Strategy’ (policy CSD9).”

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Further viability work undertaken by Gerald Eve

- 4.9 The council instructed Gerald Eve (GE) to review the financial viability of development at various sites allocated within the emerging Core Strategy Review, in respect of the proposed the Community Infrastructure Levy (CIL) Charging Schedule Revision.
- 4.10 In October 2020, GE prepared a separate report which reviewed the financial viability of development at the Key Sites in response to various questions raised by the Inspectors with regards to the deliverability of specific sites. This report was published as Core Strategy Examination of Additional Sites (document EB 03.89).
- 4.11 As part of work reviewing the existing CIL Charging Schedule, GE have prepared and shared a draft report with the council titled ‘Folkestone & Hythe District Council CIL Charging Schedule Review in relation to Strategic and Key Development Sites’ dated November 2020. It is envisaged that draft final version of the report will be made available to the Inspectors by the end of February 2021. The content of this report has regard to both the 2016 CIL Charging Schedule and the viability update produced by BPS in June 2019. The new work focuses on the assessment of viability of the Key Sites and assesses whether any further work is required to support the Section 106 delivering infrastructure requirements in the absence of a CIL charge for the Key Sites. This report presents the financial appraisal results for the three Sellindge sites (an extract is provided in Table 1 below).

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Site	RLV	BLV	Surplus/Deficit			
			Base appraisal	-5% in value	+5% in build costs	Both
Land adjacent to the surgery	£10.1m	£2.60m	£7.50m	£6.60m	£7.20m	£4.90m
Sellindge Area A – Land to the West	£4.1m	£1.30m	£2.80m	£1.10m	£1.50m	-£200k
Sellindge Area B – Rhodes House	£5.0m	£4.50m	£500k	-£1.00m	-£0.70m	-£2.10m

Table 1: Extract from draft report ‘Folkestone & Hythe District Council CIL Charging Schedule Review in relation to Strategic and Key Development Sites’

- 4.12 The appraisal concludes that all three Sellindge sites are financially viable when tested against their respective Baseline Land Values. However, all three Sites are sensitive to changes in the inputs – for example, Sellindge Phase 2 Area A would not be viable when tested against a decrease in values by 5 per cent and an increase in construction costs by 5 per cent. Sellindge Phase 2 Area B also becomes unviable when tested at a 5 per cent decrease in private residential revenue or a 5 per cent increase in construction costs. Areas A and B in the above table include an allowance for CIL and Section 106 to establish if a CIL payment could be included.
- 4.13 Given the sensitivity for viability demonstrated in Table 1, the council concludes that CIL should not be levied on Areas A and B and that developer contributions should be sought through Section 106 agreement. This would continue the approach to developer contributions that was taken for the strategic sites and broad locations in the adopted 2013 Core Strategy which has seen the successful delivery of these developments.
- 4.14 The council is preparing work to update the CIL charging schedule alongside the Core Strategy Review and the intention is to consult on proposed changes later in 2021.

5. Consideration to the Basic Approach of Policy CSD9

Introduction

- 5.1 The council undertook to give consideration to the basic approach of Policy CSD9, insofar as it identifies a broad location yet refers to and identifies specific sites with detailed policy requirements. Also the council undertook to give consideration to the implications of not allocating specific sites on the Policies Map and having the broad location sites outside the settlement boundary.
- 5.2 Policy CSD9 was adopted as a broad location in the 2013 Core Strategy. This was one of two broad locations identified, the other being in New Romney (Policy CSD8).
- 5.3 These policies did not identify specific sites but areas where development should be focused, subject to various criteria to ensure development came forward with the necessary infrastructure or to highlight other considerations.
- 5.4 For the Sellindge Broad Location, policy criteria included:
- A requirement for a masterplan;
 - Delivery of a ‘core’ area;
 - Total number of dwellings (250);
 - Provision of a village green, indicating the size, facilities and landscaping, lighting and street furniture, and nature conservation requirements.
 - Highway improvements to the A20;
 - Community facilities including extension of the primary school, and potentially other facilities such as allotments and an administrative building for the parish council; and
 - Wastewater requirements.

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- 5.5 Policies were accompanied by key diagrams, which identified the broad locations within each settlement together with the constraints and opportunities. The broad locations were outside the settlement boundaries for New Romney and Sellindge as the precise boundaries were not known but as there was a positive clear policy direction, it was considered that this would not be a constraint to development, and the subsequent development of the New Romney broad location (see council’s response to Matter 6, document EX055) and Phase One of the Sellindge broad location supports this approach.

Policy CSD9 in the Core Strategy Review

- 5.6 At the early stage in the review of the Core Strategy, permission had been granted for the original broad location at Sellindge but, as this had only just begun, criteria from the original policy were retained in the new policy. Additional phases of the policy were then added, together with new criteria, for the new broad locations to the west and east. The new diagram, Figure 5.7, identified the original area with planning permission together with the new broad locations. It was intended that the policy would still apply to a broad location rather than a specific site allocation.
- 5.7 The criteria added for the new areas were considered similar in detail to those in the original Policy CSD9 and Policy CSD8 for New Romney. The new criteria sought to ensure the provision of new facilities for balanced neighbourhoods, new highway improvements or reflected other policies in the development plan.
- 5.8 As the Core Strategy Review and the policies were being developed, the outline planning application Y16/1122/SH was submitted and granted for the broad location to the east of Sellindge. This influenced certain criteria within the policy, such as the amount of business floorspace, but overall the criteria were considered to reflect that of a broad location.
- 5.9 The policy does not intend to identify specific sites but the updated diagram is more specific in relation to the first phase, which has planning permission and is now under construction.

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- 5.10 The new areas identified are broad locations and not specific sites. The debate at the hearings focussed on specific sites, in part due to the planning applications that have been submitted and debate about the intentions of the landowners within the broad locations. It should be noted that the area to the east in the broad location (Area B) is greater on the diagram than the land currently granted planning outline planning permission. Regarding the land to the west (Area B), the council received an update by email on 2 February 2021 from the landowners of part of the broad location which is included for information in Appendix 3 to this note.

Conclusion

- 5.11 The council’s intended approach to Policy CSD9 is for a broad location rather than a site allocation.
- 5.12 However, it is acknowledged that the inclusion of the original development area, which has planning permission and is under construction, has resulted in several different elements to the policy which add to its length and complexity. Whilst the policy is intended to build on the original broad location, the diagram is more specific (as it reflected the most up-to-date situation) and this has may have added to the uncertainty as to whether the policy is intended as a site allocation or a broad location.
- 5.13 The amendments discussed at the examination hearing will include the deletion of the first phase, and the diagram will be updated to reflect this, thus leaving only the less specific broad location requirements. In addition it is proposed to modify the policy to delete references to generic policy requirements, such as those already required by the PPLP, which will have the effect of reducing its length and complexity.
- 5.14 The council considers that, with these proposed modifications, the amended Policy CSD9 will be refocussed as a broad location policy, similar in style and specificity to Policy CSD8 for New Romney (the policy as it would appear in its final form is set out in Appendix 2 to this note).

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- 5.15 With regard to the settlement boundaries, it is intended that these will remain as existing until the sites are developed and the development plan updated. This approach has been successful for the broad location in New Romney, where the settlement boundary has now been updated through the Places and Policies Local Plan, reflecting the advanced state of development of the various parcels identified in Policy CSD8.

6. Review of Policy CSD9 and Proposed Modifications

Introduction

6.1 At the hearing for Matter 7b, Sellindge Strategy, on 8 January 2021 a number of proposed changes were discussed to Policy CSD9. The council undertook to review Policy CSD9 and propose modifications to:

- Delete references and requirements related to phase one and make consequential amendments to policy wording;
- Amend reference to 90 litres of water per person per day to 110 litres;
- Amend to refer to 1.5 forms of entry primary school;
- Provide more flexibility as to how additional medical facilities could be provided;
- Provide more clarity on landscaping requirements and the impact on setting of the AONB (2 g. and 3 h. in particular); and
- Provide clear references to the nutrient enrichment issue and potential solutions and mitigation.

6.2 The amendments proposed to Policy CSD9 are set out in Appendix 1 below. Modifications include:

- The deletion of the first part of the policy, the ‘first phase’ (as this is now under construction), together with amendments to the opening paragraph to reflect this;
- The reference in criterion 2 d. to the 90 litres of water per person per day has been amended to 110 litres of water per person per day;
- Criterion 2 f. i. for the requirement for 2 forms entry has been amended to refer to 1.5 forms of entry primary school following the update from Kent County Council Education;

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- Criterion 2 f. vi. has been amended to provide more flexibility as to how additional medical facilities could be provided;
- Criterion 2 g. has been updated to clarify the landscaping requirements and the impact on the setting of the AONB and criterion 3 h., formerly in the third section of the policy, has been incorporated into this; and
- The proposed amendments to the opening paragraph now include a reference to the requirements of Policy CSD5 d. to provide clear references to the nutrient enrichment issue and potential solutions and mitigation (see also the council’s response to Matter 11, Policy CSD5, document EX075).

6.3 In addition to the above, it is proposed to amalgamate criteria 2 h. and 3 c. regarding Public Rights of Way improvements.

6.4 The modifications seek to reduce the overall number of criteria in the policy by removing those that replicate other policies in the development plan (for example requirements for open space, allotments, self-build and custom-build and energy efficiency). Additional supporting text is proposed to be added after the policy to direct the reader to the relevant policies.

6.5 Supporting text has also been updated in relation to the archaeological remains to provide more information on the possible finds.

6.6 Proposed amendments to Figure 5.7 are also shown in Appendix 1 to remove the areas of phase one housing and to label Areas A and B within the phase two broad location.

6.7 A ‘clean’ version of the proposed new policy (with deletions and additions not marked up) has been included in Appendix 2 to aid comprehension.

Appendix 1: Proposed Modifications to Policy CSD9: Sellindge Strategy and supporting text

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- **Sellindge**

- 5.150 The village of Sellindge is a Rural Centre in the west of the district. It has a wide range of facilities and services, serving Sellindge and the wider rural area. These include a GP surgery, primary school, village shop with integrated Post Office, village hall, residents’ association, sports and social club, farm shop and a public house.
- 5.151 Sellindge is dispersed in character, consisting of a series of neighbourhoods located along, or just off, the busy Ashford road (A20). Historically there has been no central core or main cluster of facilities.
- 5.152 The lack of a central core was investigated by independent consultants, appointed under national Rural Masterplanning Funding, working in collaboration with the local community.
- 5.153 The results of this were reflected in the Sellindge Strategy in the 2013 Core Strategy. The strategy set out a policy to create a new village green with 250 additional homes. A planning application has since been granted.
- 5.154 For the Review of the Core Strategy, the Growth Options Study has shown that there are still opportunities in the settlement to meet the growth required in the district until 2037. The Phase 2 study, together with further work undertaken, has indicated that, due to landscape and heritage constraints, additional development should be located to the east and south west of the settlement⁴.
- 5.155 The study and further work have indicated that development of up to 600 dwellings in Sellindge (including the 250 previously identified) could be accommodated but this would need to be supported by expanded and new facilities and infrastructure.
- 5.156 As of early 2017, there is no spare capacity for further development at either the doctor’s surgery or school, and land with potential for the future expansion of the school is in separate ownership. The existing permission granted for 250 homes includes a requirement for land and funding to increase the primary school from 0.5 to 1 form of entry, however further capacity will be required to accommodate the additional growth proposed. Given this, any proposals will have to provide land and funding for the expansion of the primary school to **2 1.5** forms of entry (**2 1.5**FE). Additionally, new or expanded health care will be required; however it may be that this can be delivered as part of a new facility within the nearby garden town.
- 5.157 With regard to infrastructure, the Growth Options Study highlights that there will be impacts on the B2068 and A20 and these should be considered as part of development proposals and the policy formation process. Any further improvements to the A20 or other roads should consider the findings of the Sellindge Rural Masterplan and applicants are encouraged to discuss their proposals with the Parish Council and highways authority at an early stage. Furthermore, there are no cycleways in this area, especially to Westenhanger Station to the east of Sellindge, with opportunity for footpath upgrades to be delivered to allow safe access to rail services from the village. Improvements to the Public Rights of Way (PROW) network adjacent or crossing the broad locations will also be sought to improve connectivity. The key PROW are HE273, HE271A, HE274, HE310 and HE301.

⁴ Section 4.6: Strategic Allocations outlines the aim and methodology of the Growth Options Study

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- 5.158 Sellindge does not fall within the AONB, but it is within its setting. Any new development, particularly at the scale proposed in policy CSD9, may give rise to some adverse landscape and visual impacts for which mitigation will be required. Through the use of landscaping on the rural edge, and through the siting, type and design of new buildings, development should be able to be assimilated into the landscape and any detrimental effects on the setting of the AONB minimised. Proposals within the Kent Downs AONB should follow the guidance and principles set out in the Kent Downs AONB Management Plan and its associated Design Guidance.
- 5.159 There are a number of listed buildings within Sellindge such as Rhodes House and Little Rhodes and buildings of local interest such as Grove House and Potten Farm, the setting of which will need to be considered in any proposals. The retention of mature trees will also be sought where possible, to soften the built environment and to mitigate the impact on the wider views from the Kent Downs AONB. The broad location to the west may contain a protected crash site and an area of medieval archaeology and evaluation and mitigation of archaeological remains will need to be undertaken in accordance with a specification and programme of work submitted and approved by the council in advance of development commencing, as set out in Places and Policies Local Plan Policy HE2.
- 5.160 Landscaping will also be important to the east of Sellindge, due to the open character of the farm land. The boundary should be heavily landscaped in this location, with planting provided to avoid amenity impacts on new residents in this part of Sellindge and the coalescence of Sellindge and Stanford. Gibbins Brook forms another clear spatial boundary on the eastern edge of this land, but as a Site of Special Scientific Interest (SSSI), impacts on the brook should be minimised and funding provided for its enhancement and protection.
- 5.161 The Growth Options Study has indicated that small-scale employment uses could be provided, however, these should be located on the eastern side of Sellindge, given its proximity to junction 11 of the M20, Westenhanger railway station and Folkestone service station. Employment provision should contribute positively to the village’s character and could provide a variety of small-scale units, for support services and offices, that avoid the need for large delivery vehicles to access the development.
- 5.162 There is the potential for the allocation to embrace new technologies to achieve a low carbon, low waste and low water environment, with an aspiration for carbon, water and waste neutrality to be explored.

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Policy CSD9

Sellindge Strategy

Land to the south and north east of Ashford Road in Sellindge forms a broad location for development to create an improved village centre with a mix of uses, a village green/common, pedestrian and cycle enhancements to Ashford Road and other community facilities together with new residential development of ~~up to~~ circa 600 dwellings. The first phase has planning permission for approximately 250 dwellings. The second phase for the remaining dwellings hereby allocated comprising Site A (land to the west of phase 1) and Site B (land to the east of phase 1) as identified on Figure 5.7 is the subject of this policy. Planning permission will not be granted for any development pursuant to this policy unless and until the Council is satisfied that the requirements of Policy CSD5 d. are met.

- ~~1. The first phase (land located in the centre of Sellindge) of any major residential led development in Sellindge parish should meet all the following criteria:~~
 - ~~a. Proposals must be properly masterplanned (following extensive community engagement) and the full area included in a single outline application;~~
 - ~~b. Development must ensure the delivery of a core area (bulk of identified land south of the A20) in parallel with/advance of any development to the west, north or east of it;~~
 - ~~c. Total residential development will not exceed approximately 250 dwellings (Class C3), with around 30% affordable housing subject to viability.~~
 - ~~d. Development should provide timely delivery of a village green/common south of the A20 that:~~
 - ~~i. Is of at least 1.5–2ha in size, or greater;~~
 - ~~ii. Provides a range of facilities (including allotments) and type of landscaping identified through consultation with local residents and complementing the existing facilities located at the sports club;~~
 - ~~iii. Is of the highest quality and incorporates robust and durable lighting and furniture; and~~
 - ~~iv. Provides new habitats for priority nature conservation species;~~
 - ~~e. Proposals must include satisfactory arrangements for the timely delivery of necessary local community facilities including:~~
 - ~~i. A primary school extension to 1 form of entry (1FE);~~
 - ~~ii. The expansion of the Doctor’s surgery; and~~
 - ~~iii. Administrative accommodation for the Parish Council.~~

Core Strategy Review Examination – Inspectors’ Action Points

~~2~~ Proposals for the second phase (Site A land to the west of phase 1 and Site B land east of phase 1) for any the residential-led development should be accompanied by a masterplan for Sites A and B which shows how the sites will be integrated with Phase 1 and the existing settlement. Development shall meet all the following criteria:

- a. The residential development element shall not commence until the primary school extension (to 1 FE), ~~doctors surgery~~ and the Parish Council administrative accommodation to be provided by in phase 1 are under construction with a programmed completion date;
- b. Total residential development within phase 2 of approximately circa 350 dwellings (including Classes C2 and C3) with 22 per cent affordable housing subject to viability and a minimum of 10 per cent of dwellings designed to meet the needs of the ageing population;
- ~~c. A minimum of 10 per cent of dwellings to be self build or custom build;~~
- ~~d.c.~~ Development shall be designed to minimise water usage, as required by the Water Cycle Study. Total water use per dwelling shall not exceed ~~90~~ 110 litres per person per day of potable water (including external water use);
- ~~e. Energy efficiency standards are agreed with the local planning authority that meet or exceed prevailing best practice;~~
- ~~f.d.~~ Proposals must include provide: ~~satisfactory arrangements for the timely delivery of necessary local community facilities including:~~
 - i. Prior to the commencement of development, land and an appropriate level of funding to upgrade enable the upgrading of Sellindge Primary school to 2 1.5 forms of entry (21.5 FE);
 - ii. Provision of new or upgraded sports grounds, open and play space or upgraded facilities in the village;
 - iii.ii. Provision of Prior to first occupation, new nursery facilities of sufficient size to meet the needs of residents;
 - iv.iii. Provision of Prior to the completion of the second phase, a replacement village hall to a specification that to meets the prospective local needs of future residents; and
 - v. Provision of new allotment facilities in accordance with; and
 - vi.iv. Prior to the commencement of development, a proportionate C contributions towards the upgrading and/or expansion of existing local medical facilities or otherwise towards a new healthcare facility to meet the needs of the residents development;
- ~~g.e.~~ The design and layout of the development shall be landscape-led and include within it structural Appropriate landscaping, including with woodland planting, shall to be provided on the rural edge of the development, particularly around the western boundary of Site A, to retain the rural character and on the eastern boundary of Site B, due to avoid or mitigate so far as the possible any visual impact on the setting of

Core Strategy Review Examination – Inspectors’ Action Points

the Kent Downs AONB and views into and out of the AONB. All landscaping shall be planted at an early stage of the development and provide new habitats for priority nature conservation species. Applications shall be accompanied by a landscape and visual impact assessment that should inform the landscaping scheme and address structural and local landscape matters;

~~h.~~ ~~The eastern development area will provide improved pedestrian and cycle access along the northern boundary (Public Right of Way HE273);~~

~~i.f.~~ Approximately 1,000sqm of business (B1 Class) floorspace shall be provided, achieving BREEAM ‘outstanding excellent’ rating;

~~j.g.~~ ~~Site A land to the west of Sellindge in Phase 2 must be masterplanned and the full area included in a single outline application. The masterplan must include Proposals should protect and conserve consideration for the setting of non-designated built and natural heritage assets such as Grove House and Potten Farm, protect and where possible enhance important historic natural heritage assets, such as hedgerows, in accordance with their particular significance; and~~

~~k.h.~~ Any archaeological remains should be evaluated and potential impact mitigated in accordance with Places and Policies Local Plan Policy HE2-;

~~3. Both phases of the development shall:~~

~~a.i.~~ Provide or contribute to convenient and safe wherever possible internal links within the sites itself and externally links to neighbouring sites to ensure there is ease of access by a range of transport modes to new and existing development and /facilities within the village and cycle and pedestrian access to Westenhanger Station;

~~b.j.~~ Deliver pedestrian and cycle enhancements to the A20 through (as a minimum) informal traffic-calming features at key locations, and perceived narrowing of the carriageway outside Sellindge primary school and associated highways improvement. Phase 2 shall extend the highways improvement area to be delivered by phase 1 extending the principles of the Rural Masterplan;

~~c.~~ ~~Contribute to the provision of a safe, lit, surfaced cycle and pedestrian access to Westenhanger Station from Sellindge through the upgrade of existing bridleways and public rights of way (HE271A and HE274);~~

~~d.k.~~ Provide noise and air pollution mitigation measures such as distance buffers between the M20/High Speed 1 transport corridor and the built development, as well as landscaping within the buffers designed to integrate with other structural planting and habitat creation delivered through the comprehensive masterplan; and

~~e.l.~~ Contribute to improvements in the local wastewater infrastructure and other utilities as required to meet the needs of the development including;

~~f.i.~~ ~~Ensure occupation of the development is phased to align with t~~The delivery of sewage infrastructure, in liaison with the service provider, aligned with occupation of the development; and

Core Strategy Review Examination – Inspectors’ Action Points

~~g.ii. Plan layout to ensure future access to existing sewage infrastructure for maintenance and upsizing purposes; and~~

~~h. Provide a high standard of design, siting and layout of development to reflect the sites’ proximity to the Kent Downs AONB.~~

5.163 Policy CSD9 should be read in conjunction with other policies in the development plan, in particular Places and Policies Local Plan Policy HB4: Self-build and Custom Housebuilding Development; Policy C3: Provision of Open Space, regarding allotments and sports facilities; Policy C4, regarding play space provision; and Policy CC1, regarding energy efficiency.

5.1634 An indicative strategy for Sellindge is set out below to show how residential development can meet needs for central facilities in a location near the junction with Swan Lane. Figure 5.7 is indicative only; proposals should be developed collectively by landowners with further community input to accord with the criteria of CSD9.

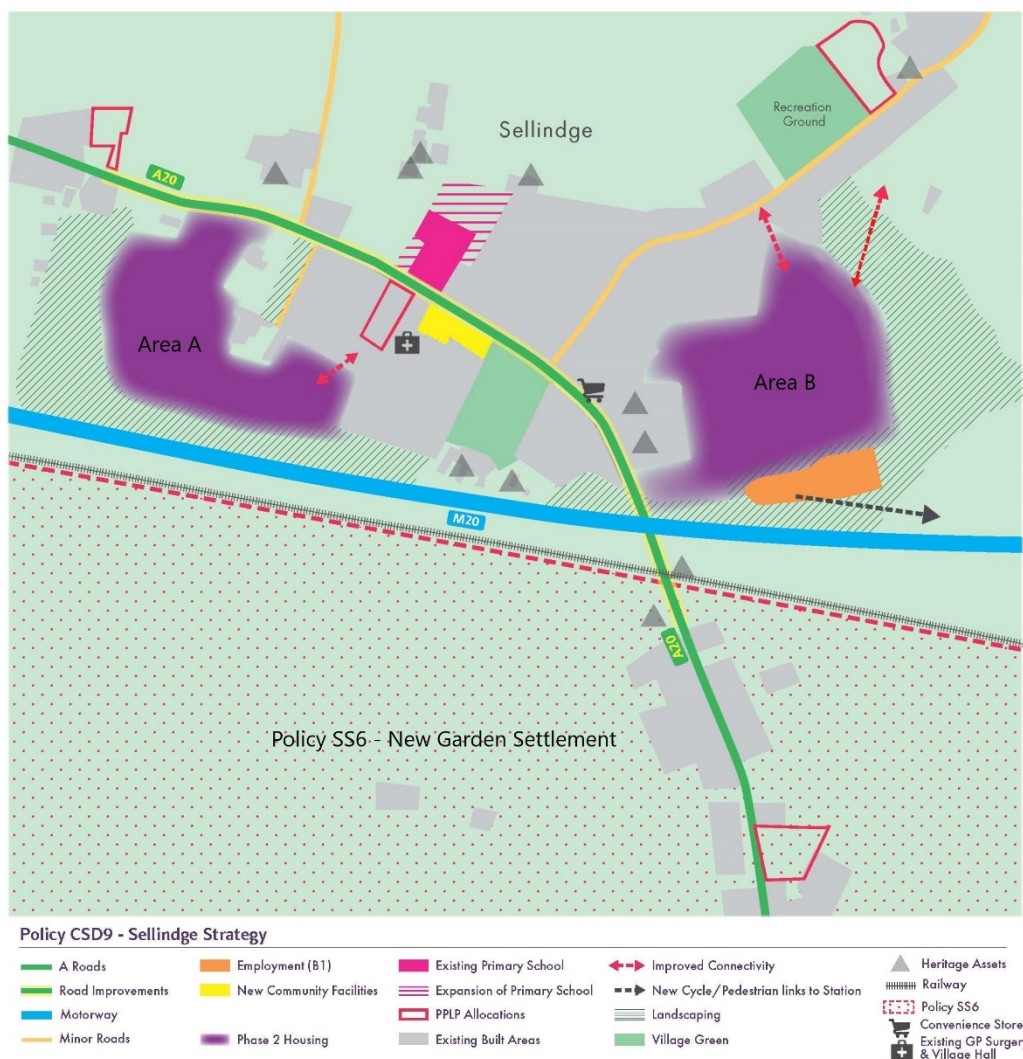


Figure 5.7: Sellindge Strategy

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- 5.16~~4~~5 In the context of strong development pressures, the identification of a broad location with two phases will allow the objectives of the Rural Masterplanning⁵ project (and also specific Aim C7 and others of this plan) to be met and infrastructure upgrades delivered. A comprehensive and deliverable proposal is needed that fully satisfies the key outcomes of the Rural Masterplanning Fund project, providing:
- A sense of place through the village green/common south of the Ashford Road (A20);
 - A suitable residential mix including affordable housing; and
 - Significant improvements to the A20 so that pedestrian/cycle movements are encouraged and vehicular drivers discern they are travelling through the heart of Sellindge.
- 5.16~~5~~6 Should these objectives not be met, development will not be supported, as this opportunity is centred on addressing local community needs (speculative proposals in other locations associated with a piecemeal pattern of development can be resisted under policy SS1).
- 5.16~~6~~7 This positive policy, along with the policies of countryside protection, will co-ordinate change in central Sellindge and ensure that inappropriate proposals that harm the village, or fail to deliver community infrastructure, can be resisted.

⁵ Urban Initiatives (2011) Sellindge Rural Masterplan Final Report

Appendix 2: Policy CSD9: Sellindge Strategy (with main modifications incorporated)

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Policy CSD9

Sellindge Strategy

Land to the south and north east of Ashford Road in Sellindge forms a broad location for development to create an improved village centre with a mix of uses, a village green/common, pedestrian and cycle enhancements to Ashford Road and other community facilities together with new residential development of circa 600 dwellings. The first phase has planning permission for approximately 250 dwellings. The second phase for the remaining dwellings hereby allocated comprising Site A (land to the west of phase 1) and Site B (land to the east of phase 1) as identified on Figure 5.7 is the subject of this policy. Planning permission will not be granted for any development pursuant to this policy unless and until the Council is satisfied that the requirements of Policy CSD5 d. are met.

Proposals for the **second phase** for the residential-led development should be accompanied by a masterplan for Sites A and B which shows how the sites will be integrated with Phase 1 and the existing settlement. Development shall meet all the following criteria:

- a. The residential development element shall not commence until the primary school extension (to 1 FE) and the Parish Council administrative accommodation to be provided in phase 1 are under construction with a programmed completion date;
- b. Total residential development within phase 2 of circa 350 dwellings (including Classes C2 and C3) with 22 per cent affordable housing subject to viability and a minimum of 10 per cent of dwellings designed to meet the needs of the ageing population;
- c. Development shall be designed to minimise water usage, as required by the Water Cycle Study. Total water use per dwelling shall not exceed 110 litres per person per day of potable water (including external water use);
- d. Proposals must provide:
 - i. Prior to commencement of development, land and an appropriate level of funding to enable the upgrading of Sellindge Primary school to 1.5 forms of entry (1.5 FE);
 - ii. Prior to first occupation, new nursery facilities of sufficient size to meet the needs of residents;
 - iii. Prior to the completion of the second phase, a replacement village hall to a specification that meets the prospective needs of future residents; and
 - iv. Prior to the commencement of development, a proportionate contribution towards the upgrading and/or expansion of existing local medical facilities or otherwise towards a new healthcare facility to meet the needs of the residents;
- e. The design and layout of the development shall be landscape-led and include within it structural landscaping with woodland planting to be provided on the rural edge of the development, particularly around the western boundary of Site A, to retain the rural character and on the eastern boundary of Site B to avoid or mitigate so far as possible any visual impact on the setting of the Kent Downs AONB and views into and

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out of the AONB. All landscaping shall be planted at an early stage of the development and provide new habitats for priority nature conservation species. Applications shall be accompanied by a landscape and visual impact assessment that should inform the landscaping scheme and address structural and local landscape matters;

- f. Approximately 1,000sqm of business (B1 Class) floorspace shall be provided, achieving BREEAM ‘excellent’ rating;
- g. Proposals should protect and conserve the setting of non-designated built heritage assets such as Grove House and Potten Farm, protect and where possible enhance important historic natural heritage assets, such as hedgerows, in accordance with their particular significance;
- h. Any archaeological remains should be evaluated and potential impact mitigated in accordance with Places and Policies Local Plan Policy HE2;
- i. Provide or contribute to convenient and safe links within the sites and externally to ensure there is ease of access by a range of transport modes to new and existing development and facilities within the village and cycle and pedestrian access to Westenhanger Station;
- j. Deliver pedestrian and cycle enhancements to the A20 through informal traffic-calming features and associated highways improvement extending the principles of the Rural Masterplan;
- k. Provide noise and air pollution mitigation measures between the M20/High Speed 1 transport corridor and the built development, to integrate with structural planting and habitat creation; and
- l. Contribute to improvements in the local wastewater infrastructure and other utilities as required to meet the needs of the development including:
 - i. The delivery of sewage infrastructure, in liaison with the service provider, aligned with occupation of the development; and
 - ii. Future access to existing sewage infrastructure for maintenance and upsizing purposes.

Appendix 3: Correspondence Regarding Land Within Area A (2 February 2021)

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From: [REDACTED]

Sent: 02 February 2021 10:11

To: [REDACTED]@folkestone-hythe.gov.uk>

Cc: [REDACTED]@folkestone-hythe.gov.uk>

Subject: RE: Availability of Potten Farm Land for FHDC Emerging Core Strategy Review Policy CSD9

[REDACTED],
[REDACTED],
[REDACTED]
[REDACTED]

2nd February 2020

SENT BY EMAIL ONLY TO:

[REDACTED]@folkestone-hythe.gov.uk and cc. [REDACTED]@folkestone-hythe.gov.uk

RE: Availability of Potten Farm Land for FHDC Emerging Core Strategy Review Policy CSD9

Dear [REDACTED],

As the owners of land in Sellindge, currently proposed to be allocated for housing led development as part of Phase 2 Site A in draft policy CSD9 of the Draft Folkestone and Hythe Core Strategy Review, we wish to express our support for the proposed allocation of our land (as identified on the appended plan).

We can confirm, for the avoidance of any doubt, that the release of the land as proposed will not undermine the operation of the current business at Potten Farm.

We understand that during the Core Strategy Review Examination Hearing Session held on 9th January 2021 covering Matter 7 - Strategy for the North Downs Area Sellindge Strategy, some participants raised concerns over the availability of the proposed allocation land. In response to those concerns, we take this opportunity to confirm that our land is available for development, in line with the proposed allocation. In addition, we can confirm that we have recently agreed Heads of Terms with a strategic land promoter who is instructed to actively promote the land on our behalf.

We trust that this letter has provided helpful reassurance that our land is genuinely available for development as part of the proposed CDS9 allocation and that we are supportive of the Councils proposed Sellindge Strategy, while also confirming that the current business at Potten Farm shall not be undermined.

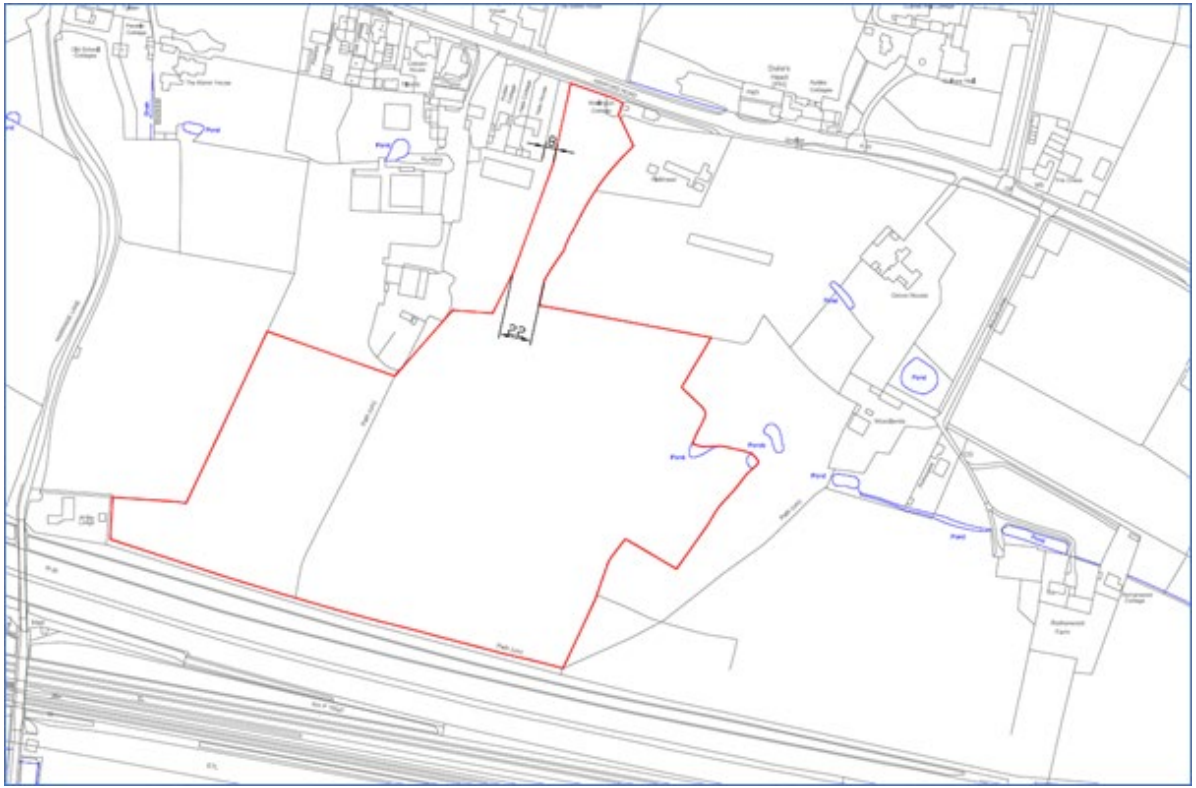
We have copied this letter to the Core Strategy Review Examination Programme Officer. In doing so, we would be obliged if a copy of this letter could be sent to the Examination Inspector.

We would be most grateful if you could confirm safe receipt of this email.

Kind Regards,



Potten Farm Land Availability Location Plan



Appendix 4: Evidence to justify the provision of upgraded or new sports and playing pitch facilities to serve Sellindge

1. Sports and leisure facilities

- 1.1 The provision of sports and leisure facilities serving the village are principally located at the Sellindge Sports and Social Club, Swan Lane at the northern-eastern extent of the village. The site is served by a footway connection, and is considered to be walkable to the existing residents. There is a small car park serving the site.
- 1.2 Sellindge Sports and Social Club was established in 1967 responding to the growth in population during this period. The site comprises an area of approximately 2.3 hectares and was leased from the village trust to provide public facilities for recreation and other leisure activities, and the playing fields were officially opened in 1972.
- 1.3 Existing facilities provided at the Sellindge Sports and Social Club include:
- Two football pitches (one full size);
 - One cricket pitch;
 - Two floodlit tennis courts;
 - Bowls club;
 - Children’s play area;
 - Social Club;
 - Changing rooms; and
 - Fully licensed bar.

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- 1.4 The facility underwent a refurbishment and extension to provide improved youth facilities in 2011.
- 1.5 There are a number of clubs that utilise these facilities including:
- Smeeth and Braybourne Football Club;
 - Sellindge Tennis Club; and
 - Sellindge and District Bowls Club.

The findings of the Playing Pitch Strategy and Sports Facilities Strategy

- 1.6 The council commissioned Ploszajski Lynch Consulting Ltd. (PLC) to produce a Playing Pitch Strategy (PPS) for the district (document EB 05.30). This is part of a wider assessment of sport and leisure provision in the district which also includes a Sports Facilities Strategy (SFS) (document EB 05.40).
- 1.7 The aim of the PPS is to undertake an assessment of playing pitches and the future need for provision, driven by increased population and to identify any gaps in the existing network of provision.

Grass football pitches: an overview

- 1.8 Key information drawn from the PPS in reference to sports pitch provision and pitch quality insofar as this relates specifically to Sellindge is summarised below:
- Two adult football teams use the single football pitch at Sellindge Sports and Social Club as a match venue.
 - The pitch is also used by a total of five youth teams affiliated with Smeeth and Braybourne Football Club.
 - One adult pitch is available for community use at Sellindge Sports and Social Club and is the subject of regular use.

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- Although two youth pitches are available for community use at Sellindge Sports and Social Club they are not subject to regular use.
- The adult football pitch at the Sellindge Sports and Social Club is of a poor standard, and thus will require investment in the pitch condition to bring it up to a more appropriate standard.
- Representatives of the Kent FA undertook a tour of pitches with the FA’s Regional Grounds Maintenance Advisor, to moderate the quality assessments undertaken by the consultants and reported that the pitch at Sellindge was “in a poor condition with mole hills evident”.

Site specific actions for grass pitches (football)

- 1.9 The site specific actions as set out in the PPS identifies that the Sellindge Sports and Social Club is of poor pitch quality and there is no current use of youth/mini pitches. The associated actions are to review the grounds maintenance with the Grounds & Natural Turf Improvement Programme (GANTIP). The appointed lead is the Sellindge Sports and Social Club, and the action has been assigned high priority.

<i>Site</i>	<i>Issues</i>	<i>Action</i>	<i>Lead</i>	<i>Partners</i>	<i>Resources</i>	<i>Priority</i>
Sellindge Sports and Social Club	<ul style="list-style-type: none"> • Poor quality pitch • No current use of youth/mini pitches 	<ul style="list-style-type: none"> • Review grounds maintenance with GANTIP • Encourage use of youth/mini pitches 	Sellindge SSC	GANTIP	-	High

Calculating developer contributions for improved pitch facilities

- 1.10 Concerning the capital costs of upgrading the playing pitch facilities at Sellindge Sports and Social Club, the council asked the consultants that undertook the PPS to calculate the associated cost of improving the pitch. The consultants used the Playing Pitch Calculator, which assists local authorities in estimating the demand that may be generated for the use of playing pitches

Core Strategy Review Examination – Inspectors’ Action Points

by a new population. The calculator returned capital costs of £34,536 and £5,175 annual lifecycle costs for Sellindge. The consultants confirmed the associated use of the contribution to advise the council:

“Given that the pitches at Sellindge Sports and Social Club are rated as ‘poor’ quality and with no current spare capacity to accommodate additional demand, the obvious way to invest the money would be on pitch quality improvements at the current site”.

- 1.11 The Calculator figure of £34,536 capital costs and £5,175 annual lifecycle costs is appropriate for drainage and levelling improvements and subsequent maintenance. It is noteworthy that a Section 106 contribution that applies the output from the Playing Pitch Calculator was secured in accordance with the permission granted under reference Y16/1122/SH on ‘land rear of Rhodes House, Main Road, Sellindge’ that was granted outline planning consent on 7 January 2019. The extract from the Section 106 is presented below.

Sports Pitch	£34,536	Prior to occupation of 75% of dwellings	
	£5,175pa for 10 years	First anniversary of sports pitch contribution & yearly thereafter	

Tennis court provision (outdoor)

- 1.12 The Sellindge Sports and Social Club also benefits from the provision of two tarmac tennis courts, as presented in the SFS. Current expressed demand for the tennis club amounts to 41 members. The club has a capacity of 120 members, and so the utilisation rate is 34 per cent.
- 1.14 Concerning future accessibility, the SFS asserts that providing locally accessible outdoor tennis courts as part of the Otterpool Park and Sellindge expansion would be consistent with meeting health and well-being objectives in the new developments.

Core Strategy Review Examination – Inspectors' Action Points

- 1.15 Representatives of the Tennis Club and the Sellindge Sports and Social Club facility have recently contacted the Council to advise that the club requires more members, and that low membership levels have been driven in part, by the deteriorating quality of the court surfaces.
- 1.16 The estimated cost of resurfacing the two courts with macadam and Pladdek is in the order of £35,000, and the associated costs have been clarified by representatives of the tennis club as being in the correct order of magnitude.
- 1.17 The council will seek a Section 106 contribution to upgrade the existing tennis courts at the Sellindge Sports and Social Club in accordance with policy CSD9 criterion 2f.i.

Appendix 5: Evidence to justify the provision of upgraded or new community facilities to serve Sellindge

1. Community use - village halls

- 1.1 Sellindge Village Hall is centred at the heart of the village adjacent to the GP surgery and has been in existence since 1922 when residents purchased a YMCA hut from Dymchurch and erected the building on the present site, south of Ashford Road. The hall has been renovated and extended several times over the years. The most comprehensive took place in 1975 with an extension which included a new small hall (Durling Hall), kitchen, cloakrooms and store.
- 1.2 The village hall is booked daily and widely used by many clubs and organisations including:
- The Women’s Institute;
 - Sellindge Gardeners’ Association;
 - Guides;
 - Brownies; and
 - Sellindge Baby and toddler group.
- 1.3 There is also a village hall at the Sellindge Sports and Social Club.
- 1.3 Section 13.2 of the Sports Facilities Strategy (SFS), document EB 05.40, provides details of the local of village and community halls with community use in the district. Sellindge benefits from two village halls, located at the Sellindge Sports and Social Club and Sellindge Village Hall. Details of the corresponding dimensions are presented below.

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Site	Address	Dimensions
Sellindge Sports and Social Club	Swan Lane, Sellindge TN25 6HB	12m x 10m x 3m
Sellindge Village Hall	Main Road, Sellindge TN25 6JY	18m x 10m x 3m

1.4 The SFS (section 13.3) provides analysis of the relative quality of the village hall provision across the district through a non-technical visual inspection. Facilities were assessed on the basis of their suitability to accommodate sport and physical activity.

- *Provision for formal sport:* Including dedicated sports facilities and markings and changing rooms. These are given a rating of 4
- *Available for a range informal physical activity:* The provision of a space which can be used for several recreational sports. These are given a rating of 3
- *Limited availability for physical activity:* The provision of a space which can be used for exercise classes such as yoga or aerobics. These are given a rating of 2
- *Not available for physical activity:* These are given a rating of 1

1.5 Both village halls were applied a rating score of 3, meaning that they are available for a range of informal physical activity.

1.6 In terms of availability and use of the village halls, section 13.5 of the SFS sets out the appropriate information. The table below identifies the sport and physical activity currently accommodated at village and community halls in the district. The information was supplied by the facility operators:

Sellindge Sports and Social Club	Table tennis, short mat bowls
Sellindge Village Hall	Pilates, keep fit

1.7 The action plan set out in section 13.18 of the SFS sets out a requirement for a community hall to be provided as part of the further expansion of Sellindge.

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13.18 Action Plan

<i>Issues</i>	<i>Action</i>	<i>Lead</i>	<i>Partners</i>	<i>Resources</i>	<i>Priority</i>
Protection of existing village and community halls.	Include a policy in the Local Plan to protect all existing water sports facilities	SDC	-	-	High
Funding for future village and community hall needs.	Include athletics village and community halls as ‘relevant infrastructure’ under CIL regulation 123.	SDC	-	-	High
Need for two additional village and community halls by 2037.	<ul style="list-style-type: none"> • Include a requirement for a community hall in Otterpool Park Garden Town. • Include a requirement for a community hall in the Sellindge expansion. 	SDC	Developers	£640,000 for each community hall	Medium

Appendix 6: Evidence to justify the provision of upgraded or new healthcare facilities to serve Sellindge

1. Healthcare

1.1 As drawn from Sellindge Surgery Quality Report⁶, Sellindge Surgery is in the heart of the village, and is a practice with five doctors serving a wide rural area, accepting patients from Sellindge, Smeeth, Aldington, Mersham, Stowting, Stanford North, Hinxhill and Newingreen.

1.2 The Estates Strategy and Implementation Plan dated 2018 for the Ashford CCG area (document EB 05.70) provides useful clarification regarding the potential expansion of existing GP surgeries. Key information pertaining to Sellindge surgery is bulleted below:

- The building is a purpose built facility constructed in 1988.
- The building is leased.
- The existing Sellindge surgery is of 413 sq m (Net Internal Area) and had a patient list size of 4,883 as of 1st July 2017.
- The surgery was assigned a RAG rating ‘green’, meaning it meets statutory compliance.
- The demographics of the patient population is similar to local and national averages. However, the practice has slightly higher proportion of older patients.
- Sellindge Surgery is able to provide dispensary services to those patients on the practice list who live more than one mile (1.6km) from their nearest

⁶ <https://www.cqc.org.uk/location/1-554106450>

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pharmacy premises. There are currently approximately 4,600 patients registered to use this service.

- The population increase assigned to this practice is 204 which would require one additional clinical room, although it should be able to be absorbed as is. However the development of the new garden settlement may drive a new approach.

1.3 The Kent & Medway Sustainability Transformation Plan describes practices working closer together in alliances along with social care, community NHS and acute NHS clinical staff and services. To this end practices have grouped themselves into three connected hubs for shared working arrangements – Ashford North, Ashford Urban and Ashford Rural.

1.4 Ashford North includes: Hollington Surgery, New Hayesbank Surgery, Sellindge Surgery and Wye Surgery.

1.5 Paragraph 3.7.3. of the Estates Strategy and Implementation Plan dated 2018 identifies that the following premises have development potential in terms of land available for development:

North Cluster









- Wye Surgery.
- Sellindge Surgery.

1.6 The commentary adds that further potential for increased clinical activity include:

- Ensuring extended opening hours;
- Productivity review of rooms and how they are used; and
- Movement of administrative staff to leased office space and conversion of free to clinical space.

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- 1.7 As identified in section 3.7.3 of the Estates Strategy and Implementation Plan 2018, the Hamstreet surgery has an NIA of 491 and a patient list of 7,186.

North	Sellindge Surgery	Leased			413	4883	Post 1998 purpose built surgery premises. New generation primary healthcare centre. Modern facilities throughout. DDA compliant. Public transport links are a short walk.
North	Wye Surgery	Owned			576	8692	Pre 1998 purpose built surgery premises. Two storey building not fully DDA compliant. Well maintained surgery with evidence of a planned maintenance programme. However, the older design and specification is of its time and some areas of the surgery require an upgrade to the layout, fixtures and fittings to meet current standards. No lift. Car parking for staff visitors and patients.
Rural	Charing Surgery	Owned			613	9812	Pre 1998 purpose built surgery premises. Clinical rooms on ground floor; administration first floor. One and one half storey accommodation. Largely DDA compliant. Modern surgery premises with integral pharmacy. Busy practice with growing list. Large car park.
Rural	Hamstreet Surgery	Owned			491	7186	Pre 1998 purpose built surgery premises. Extended 1994 and 2011. Modern two storey extension with clinical rooms and meeting room. Older part is principally used for administration, dispensary and staff facilities. Further proposals to extend and alter the accommodation to facilitate training places. The surgery car park is shared with the village hall. Additional staff car park located close by.

- 1.8 As a proxy, this suggests that if the Sellindge surgery were extended by 78 sq m NIA (which equates to a footprint of 39 sq m), which is entirely plausible given the availability of land to extend, then the surgery could be the subject of an uplift in patient numbers of 2,303 to bring it on par with the Hamstreet Surgery whilst still maintaining a green RAG rating. Given the CCG’s ambition is to move to list sizes of 8,000 plus per practice, it is entirely plausible that the future expansion of the Sellindge Surgery would provide sufficient accommodation capacity to meet this objective. Indeed, based on the Hamstreet example, it is estimated that a surgery of 546 sq m would be required to accommodate a patient list of 8,000. This would require a 133 sq m extension of the Sellindge Surgery which, given it is a two-storey building, would equate to a footprint of 66.5 sq m.

The case for a new healthcare facility to serve Sellindge

- 1.9 Although the Estates Strategy and Implementation Plan dated 2018 is a recently published document, representatives of the CGG have very recently informed the district council that the existing healthcare provider does not intend to renew the lease when it expires in 2021 as it is felt the building is no longer fit for purpose. The CCG has advised that it has recently had internal discussions regarding future healthcare provision and from this has concluded that the current site is not suited to extension or expansion, and over time will need relocating. With this in mind the CCG are pushing for financial contributions from all new residential development to offset the cost of a new build.

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1.10 Modifications to criteria d iv) of Policy CSD9 (see Appendix 1 to this note) are proposed to allow sufficient flexibility to enable the CCG to seek contributions towards new or expanded healthcare facilities:

“iv. Prior to the commencement of development, a proportionate contribution towards the upgrading and/or expansion of existing local medical facilities or otherwise towards a new healthcare facility to meet the needs of the residents; ...”