

Core Strategy Review - Inspectors' Action Points

**Matter 6 – Strategy for the Romney Marsh Area
- Policy SS1 and Policy CSD8**

20 January 2021



Core Strategy Review Examination – Inspectors’ Action Points

Contents

Matter 6 – Strategy for the Romney Marsh Area - Policy SS1: District Spatial Strategy and Policy CSD8: New Romney Strategy.....	2
1. Introduction.....	2
Appendix 1: Proposed Modifications to Policy SS1: District Spatial Strategy and supporting text	3
Appendix 2: Proposed Modifications to Policy CSD8: New Romney Strategy	7

Matter 6 – Strategy for the Romney Marsh Area - Policy SS1: District Spatial Strategy and Policy CSD8: New Romney Strategy

1. Introduction

- 1.1. During the hearing session for Matter 6, Strategy for the Romney Marsh Area, the council undertook to review Policies SS1: District Spatial Strategy and CSD8: New Romney Strategy.
- 1.2. Proposed modifications were identified to:
 - Amend references in the Statement of Common Ground with the Nuclear Decommissioning Agency / Magnox (EX 045) regarding the revocation of Class B1 as part of changes to the Use Classes Order 2020 as it relates to Policy SS1;
 - Amend Policy SS1 regarding the proposed Area Action Plan (AAP) for London Ashford Airport (LAA), as set out in the Statement of Common Ground with LAA (EB 13.96) in relation to the AAP having to satisfy a Habitats Regulations Assessment; and
 - Amend references to affordable housing provision in Policy CSD8.
- 1.3. Proposed modifications to Policies SS1 and CSD8 addressing these points are set out in Appendices 1 and 2 to this note. Changes to the supporting text relating to Dungeness are also shown, as set out in document EX 045.

Appendix 1: Proposed Modifications to Policy SS1: District Spatial Strategy and supporting text

4.28 The spatial strategy is informed by a range of studies and the understanding of places as portrayed in sections 1.2 and 3.2.

Policy SS1

District Spatial Strategy

Housing will be delivered through a new sustainable, landscape-led settlement, with supporting town centre and community uses, based on garden town principles in the North Downs Area, in accordance with policies SS6-SS9. The garden town will maximise opportunities arising from the location, access to London and continental Europe and strategic infrastructure. Housing and supporting community uses will also be delivered through growth in Sellindge (policy CSD9).

Elsewhere in the district, priority will continue to be given to previously developed land in the Urban Area in Folkestone, for main town centre uses and housing, to enhance the town's role as a sub-regional centre, with opportunity for increased densities within the town centre and maximisation of employment opportunities at key locations.

Development in the Urban Area will be led through strategically allocated developments at Folkestone Seafront (policy SS10) and Shorncliffe Garrison, Folkestone (policy SS11), and the delivery of strategic mixed-use development at Hythe (policy CSD7).

Remaining development needs should be focused on the most sustainable towns and villages as set out in policy SS3. Development outside the new settlement and identified centres in the open countryside and on the coast (defined as anywhere outside settlements within Table 4.3 Settlement Hierarchy) will only be allowed exceptionally, where a rural or coastal location is essential (policy CSD3).

This is supported by the following strategic priorities for the three character areas of the district:

- **Urban Area** - The future spatial priority for new development in the Urban Area (Folkestone and Hythe) is on promoting the development of vacant previously developed land, central Folkestone and the north of the town, and other locations within walking distance of Folkestone Central railway station; securing new accessible public green space, plus regenerating western Hythe.
- **Romney Marsh Area** - The future spatial priority for new development in the Romney Marsh Area is on accommodating development at the towns of New Romney and Lydd, and at sustainable villages; improving communications; protecting and enhancing the coast and the many special habitats and landscapes, especially at Dungeness; and avoiding further co-joining of settlements and localities at the most acute risk to life and property from tidal flooding.
- **North Downs Area** - The future spatial priority for new development in the North Downs area is on the creation of a landscape-led sustainable new settlement based

Core Strategy Review Examination – Inspectors’ Action Points

on garden town principles outside the Kent Downs Area of Outstanding Natural Beauty (AONB) boundary and without material impact on its setting, and the expansion of Sellindge. Within the Kent Downs AONB development will be limited to consolidating Hawkinge’s growth and sensitively meeting the needs of communities at better-served settlements. Major development will be refused within the AONB other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest, in accordance with the National Planning Policy Framework. All proposed development in the North Downs area will have to satisfy the requirements of policy CSD5 d. in order to avoid any significant impact on the water quality of the Stodmarsh European designated sites.

The strategic growth of New Romney is also supported through policy CSD8 to allow the market town to fulfill its potential to sustainably provide for the bulk of the housing, community infrastructure and commercial needs of the Romney Marsh Area. Development will also be planned at other identified settlements in line with the Settlement Hierarchy sufficient to ensure the achievement of growth requirements. In particular, development which helps to maintain and support the local role of the market town of Lydd can meet priority needs.

Dungeness A should be retained for: offices (within class E), general industrial (within class B2) and storage or distribution (within class B8) and research and development employment uses; employment-related training and educational purposes; and operations and uses associated with the decommissioning of the nuclear power station. Should redevelopment plans come forward for alternative uses unrelated to the function of the nuclear power station (including other energy generation sector uses), the council will work with the Nuclear Decommissioning Authority, local community and other stakeholders to prepare and adopt an Area Action Plan for part or the whole of the site.

Should development proposals come forward for the further material expansion of **London Ashford Airport** at Lydd (beyond the existing permissions and permitted development rights), the council will work with the airport, local community and other stakeholders to prepare and adopt an Action Area Action Plan for the site. The Council will support small-scale operational development integral to, and required to maintain, the airport use, subject to being satisfied that there would be no significant adverse impacts on the integrity of nationally and internationally designated sites of biodiversity value.

The preparation of Area Action Plan(s) for the Dungeness A or London Ashford Airport sites will be accompanied by Habitats Regulation Assessment(s) (including Appropriate Assessment) to assess the potential effect of the Area Action Plan proposals on sites within the Natura 2000 network that are protected under the European Birds and Habitats Directives. The Habitats Regulation Assessment(s) must show that development would not result in significant adverse effects on these sites of biodiversity value, either alone or in combination with other projects and plans.

Within identified settlements, development as agreed by the local community in neighbourhood plans will be encouraged where well-related in scale and location to the Settlement Hierarchy, and in line with the strategic policies of the Core Strategy Review and Places and Policies Local Plan.

Core Strategy Review Examination – Inspectors’ Action Points

In all locations throughout the district, development should be designed to directly contribute to the sense of place and sustainable design as set out in policy SS3.

- 4.29 SS1 primarily addresses Core Strategy Review aims under the following Strategic Needs: A, B, C and D.

Urban Area

- 4.30 Currently the majority of the district's population, jobs, shops and higher-order public facilities are found in Folkestone and Hythe. Major transport connections - including High Speed 1 services, the Channel Tunnel terminus and the M20/A20 - open up central and northern Folkestone and north/west and central Hythe as accessible locations for investment, less than one hour from central London.
- 4.31 These connections, alongside the overall attractiveness and competitiveness of the district, have the potential for transforming its economic performance. This will be supported by a critical mass and choice of premises, markets, supporting facilities and working/living environments, all well-served by regional, national and international transport connections.
- 4.32 The development of homes, jobs, shops and services close to public transport facilities will help to minimise carbon emissions. Similarly, avoiding the main tidal flood risk zone will ensure risks from sea level rise are reduced.
- 4.33 In and around Folkestone and Hythe the character and quality of the natural environment also varies significantly, but includes part of the AONB and other valuable features. There are opportunities for a range of targeted improvements, not only housing and jobs, but also developing networks of green infrastructure close to the majority of the district's population. Former military training land at Seabrook Valley is well placed to both Folkestone and Hythe and the AONB, and can be a catalyst for improved management of the urban/rural fringe.
- 4.34 Maintaining the environmental quality and vitality of the district's rural area must be allied with the regeneration of its towns. The spatial strategy therefore prioritises opportunities in central Folkestone (including the Seafront and central sites near High Speed 1 railway stations) and at Shorncliffe Garrison. These opportunities provide the most feasible means to secure new community services in the Urban Area.
- 4.35 Hythe can play an appropriate complementary role, led by its attractive town centre and the implementation of remaining proposals for major housing-led mixed-use development at the former Nickolls Quarry (Martello Lakes) development.

Romney Marsh Area

- 4.36 The Romney Marsh Area has its own particular strategic development needs. These should be addressed in the context of potential flood risk and infrastructure constraints. Rural transport is a priority, especially along the coastal route, to benefit from services in and around Folkestone and Hythe (for example development at the former Nickolls Quarry). Its coast and distinctive environmental features need to be protected, most

Core Strategy Review Examination – Inspectors’ Action Points

notably at Dungeness. To this end, the spatial strategy focuses new development at New Romney to serve both the town and the wider area, complemented by actions to address regeneration needs at Lydd. At better-served Romney Marsh villages, there may be potential for some sensitive modest development to create more sustainable villages.

Dungeness Power Stations

- 4.37 For over 50 years, Dungeness Power Stations (A & B) have been a cornerstone of the Romney Marsh economy. Dungeness A ceased generation in 2006 and is currently undergoing decommissioning. Initially it was expected that from 2019 the site would enter a period of Care and Maintenance (C&M) lasting some 85 years pending final site clearance. The commencement of C&M would have had a serious impact on employment (in December 2019 approximately 220 people were employed on the site) as well as the local economy. It is now likely that the C&M phase will be replaced with decommissioning work continuing instead over the coming decades. This could mean that skilled staff are retained, employment is increased, and land is released for new economic uses, or for clearance, earlier than would happen through the C&M approach.
- 4.38 The Nuclear Decommissioning Authority is expected to announce its decision on whether this approach will be adopted for Dungeness A in the near-term. EDF’s Dungeness B station is expected to continue generating electricity until 2028, following which it will be decommissioned over a lengthy period. The EDF Director’s Report Dungeness B June 2017 reported that the station employs over 550 employees, which is supplemented by over 200 contract partners, so its closure would have major socio-economic impacts although, as with Dungeness A, these would be experienced gradually. It is important to recognise that there is likely to be a significant impact on jobs in the latter stages of the plan period. In the wider context of other current economic challenges and uncertainties, the decommissioning of the Dungeness Power Stations will create significant economic and social challenges for Romney Marsh. In addition to jobs being lost, businesses will find it increasingly difficult to operate successfully in an area which already has some pockets of significant deprivation and therefore the case for supporting local employment opportunities and the future of the Dungeness Power Stations site becomes an important consideration.
- 4.379 Opportunities also exist for employment development at London Ashford Airport at Lydd, through the implementation of the existing planning permission. The council acknowledges the positive impact that Lydd Airport could deliver in supporting the regeneration of Romney Marsh and surrounding areas, accordingly Sshould further material development proposals arise, beyond the existing permissions and permitted development rights, the council will seek to work with the airport, local community and other stakeholders to agree a framework by preparing an **Action** Area **Action** Plan for the site. The further development of the Mountfield Road Industrial Estate and investment within the nuclear and tourism industries also present opportunities for job creation.
- 4.3840 Change is also inevitable in places outside these towns and villages, but the spatial strategy seeks to manage the countryside for green infrastructure and sustainable agriculture, coastal protection and tourism, while restricting inappropriate development. Countryside protection will also allow a focus on local community, rural business, affordable housing and other development where a countryside location is essential. Specific criteria are set out in other Core Strategy Review policies including CSD3 and CSD4.

Appendix 2: Proposed Modifications to Policy CSD8: New Romney Strategy

Policy CSD8

New Romney Strategy

New Romney should develop as the residential, business, service, retail and tourist centre for the Romney Marsh in line with the vision in paragraph 3.20. New development should respect the historic character of the town and the established grain of the settlement in line with the place-shaping principles set out in policy SS3.

The future development of the town should support the retention of existing businesses and the attraction of new employment opportunities through the provision of an adequate supply of employment land to meet future need and through the provision of a sufficient level of new residential development to maintain an adequate labour supply.

The strategy for New Romney therefore supports the following:

- The enhancement of New Romney as a key market town and service centre for Romney Marsh, providing a range of services and attractions for local residents and tourists.
- The provision of further employment at an expanded Mountfield Road Industrial Estate, with better vehicular and pedestrian linkages to the town centre.
- A broad location for residential development to the north of the town centre.

Development of the broad location should meet the following criteria:

- a. The development as a whole should provide around 300 dwellings (Class C3) and a range and size of residential accommodation, including ~~22%~~ 30% affordable housing, subject to viability.
- b. Pedestrian/cyclist linkages southwards to the town centre should be improved and prioritised from the central area of the development, in preference to linkages around the periphery of the site.
- c. Land proposed for residential development must have a sufficient level of internal connection through providing a new movement link through the site, appropriately designed to 20mph, and/or through a cycleway/footpath to provide a secure and attractive green corridor.
- d. Proposals should incorporate as necessary a minimum of 0.7ha of land for the upgrade of St Nicholas’ Primary School playing facilities on a consolidated area.
- e. Archaeological constraints need to be examined and associated mitigation will be required to be provided at an early stage, in order to inform the masterplan, development strategy and quantum of development.
- f. Flooding and surface water attenuation for the overall site should be concentrated in the lowest areas of the site, recommendations of the Strategic Flood Risk

Core Strategy Review Examination – Inspectors’ Action Points

Assessment (SFRA) must be followed, and measures should also provide visual and nature conservation enhancement for the benefit of the site and local community.

- g. Appropriate off-site mitigation measures must be identified, including to ameliorate highway impacts and manage drainage demands.

The layout and design of any proposals for the remaining undeveloped two parcels of land under the broad location must take into account the potential development of the adjoining land parcel and the existing development. In particular the internal road layout of the two parcels allocated to the south-east of Cockreed Lane shall not prejudice the future delivery of a ‘link’ road (criterion c. above) to provide a vehicular connection between the two parcels and the developed part of the broad location to the north-east.

Development of the broad location must aim to integrate with the physical environment, including addressing the natural boundary which is currently defined by Cockreed Lane, as well as neighbouring previously developed land to the north east of Cockreed Lane. In addition, if the objectives of this policy cannot be met within the scope of this area, consideration may be given to land to the southwest of Ashford Road, subject to further discussions and any environmental or other constraints being addressed.

Development at the town should consolidate and improve the market town/service centre function of New Romney through contributing as relevant to the public realm and other priorities for investment in the High Street in line with SS5 including:

- Providing additional crossing points in the High Street to increase the ability of shoppers and visitors to circulate along the retail frontage.
- Improving the setting of historic buildings and minimising the environmental impact of through traffic within the High Street.
- Contributing towards community facilities required to serve the needs of the town.

Development will need where appropriate to detail the delivery of measures, or contribute to improvements, in skills/training in the Romney Marsh area.