

URS



Land at New Romney
LDF Core Strategy Policy Advice

Report
August 2011

Revision Schedule

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1 Introduction

1.1 Introduction

1.1.1 URS Scott Wilson has been appointed by Shepway District Council (SDC) to assist with the preparation of Strategic Planning Advice associated with the proposed allocation at New Romney.

1.1.2 The proposed site is located to the south of Cockreed Land and is bounded by Rolfe Lane to the east (and south) and Ashford Road to the west. The built edge of New Romney forms the southern boundary to the site. A location plan is shown at **FIGURE 1.1**.

1.1.3 The development area was identified in the Shepway LDF Core Strategy Preferred Options document, published in June 2009. This was supported by the draft Policy RM2 (see **APPENDIX A**).

1.1.4 As part of the process of developing the Core Strategy, a masterplan was prepared for the site by the landowners and their representatives which was submitted to SDC during October 2010 (see **APPENDIX B**).

1.1.5 The landowner for a site located to the west of Ashford Road has previously indicated that a masterplan proposal for that site will also be put forward. This same land owner has also submitted an application for planning permission for residential development on the Potato Company site to the east.

1.2 Background

1.2.1 Under a separate commission in 2010, URS Scott Wilson prepared the Transport Strategy for SDC, which forms part of the evidence base of the authority's Core Strategy. Working with officers of SDC, Kent County Council (KCC) as the local highway authority and the Highways Agency, as well as a range of local and community stakeholders, the Transport Strategy was completed in January 2011.

1.2.2 The Transport Strategy considered the existing transport environment within the district of Shepway both for the 2010 baseline scenario as well as the forecast 2026 scenario, representing the term over which the Core Strategy will run, excluding development relating to the 'strategic sites' which are identified within the Core Strategy. A comparative assessment was then undertaken, allowing each of the 'strategic site' developments to be included.

1.2.3 Following the completion of the Transport Strategy, SDC have consulted with URS Scott Wilson concerning the New Romney 'strategic site' specifically, seeking assistance with the establishment of the associated policy for the site. In addition to providing transport advice in this case, planning, archaeological and flooding considerations have also been included. This report therefore summarises the work that has been undertaken and provides further information relating to the proposed New Romney 'strategic site' policy approach.

1.3 Purpose

1.3.1 SDC requested that URS Scott Wilson undertake an independent review of proposals for development of land to the north / west of New Romney, on behalf of the local authority. The

purpose of the assessment is to provide an integrated overview of the constraints and opportunities in the area for residential-led development, so as to provide guidance on the formation of a strategic policy within the Shepway LDF Core Strategy.

1.3.2 The resultant assessment has therefore been summarised within this document, which it is proposed should be referred to by the council in informing its decisions regarding the Core Strategy's provisions for New Romney. The report has been prepared utilising a combination of externally generated information and in drawing these various sources together, it is considered that this report is likely to constitute the main evidence base concerning this site, for the local authority.

1.3.3 This assessment has reviewed the existing background information which has been provided relating to the constituent sites. At an early stage, a workshop was held with officers of SDC and the respective technical specialists at URS Scott Wilson. A meeting has also been held between SDC, URS Scott Wilson and stakeholders representing some of the land parcels which comprise the potential 'core' development site.

1.4 Context

1.4.1 New Romney has a resident population of approximately 10,000 people within its urban area and is the largest town in the south of Shepway District. It has an attractive historic character, and although small, its retail offer includes some high quality independent retailers and limited vacancy. There is a range of community facilities such as a secondary school (subject to recent investment) and a library (identified by KCC as small and constrained).

1.4.2 The High Street is linear and whilst it hosts a predominance of local shops, it forms the main A259 coastal route, which serves the whole of the district, east-west. The public realm in the town is dated in appearance, with limited pedestrian and parking facilities. The stand alone central crossing facility on the High Street inhibits natural circulation around the central town area.

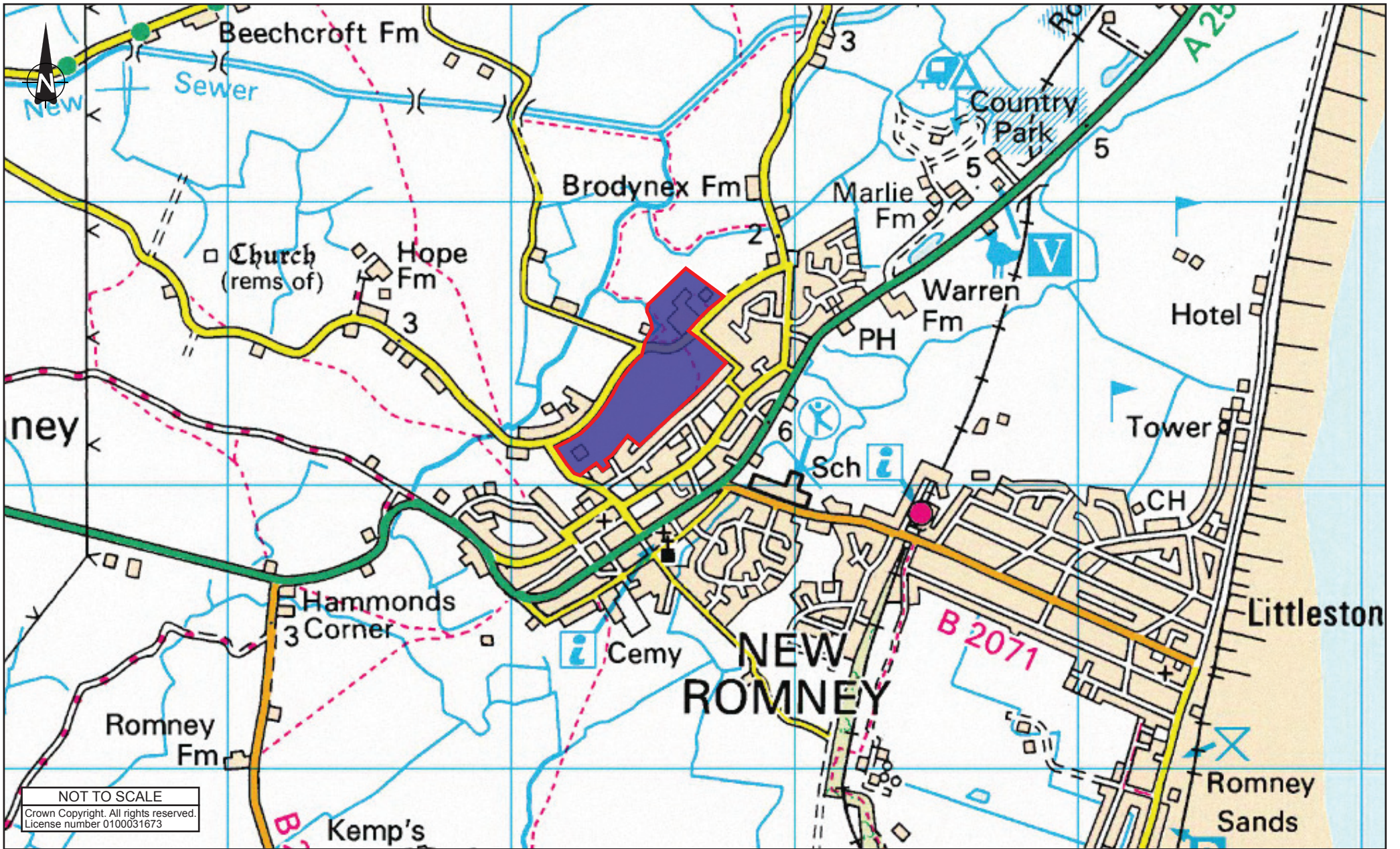
1.4.3 Given the relative status of the town within this area of the district, the broad locality has been identified as a potential area for new residential development in the emerging Core Strategy so as to:

- Ensure a geographical distribution of new housing development that responds to demographic changes in the district;
- Promote the long-term development of Romney Marsh, in the context of limited suitable and available sites for major residential development; and,
- Focus development on New Romney town, to support and in turn help expand its role as the primary retail, commercial and visitor service centre for south Shepway.

1.5 Scope

1.5.1 SDC has identified that the consideration of development options associated with this 'strategic site' should not necessarily be limited to the land which has previously been identified, but should give appropriate consideration to the possibility of incorporating or recommending that alternative additional sites may be able to be brought forward in combination with, or possibly in preference to, the previously identified land.

- 1.5.2 Particular emphasis has been afforded by the authority of delivering a sustainable development, having regard to connectivity of the land with local shops, schools and other facilities. In addition, SDC have stated that any development at New Romney should provide finance to improve local community facilities, including the local play offer (on-site or off-site) and the upgrading of local community venue(s).
- 1.5.3 A number of key issues were identified by SDC which this assessment has sought to consider and furthermore, will need to be addressed by any future development. These include:
- **Planning** – giving consideration to the potential of new residential development to be provided on greenfield land located at the existing urban fringe of the town
 - **Archaeology** – consideration of the existing archaeological resource on the site
 - **Flood Risk** – in relation to flooding, drainage and runoff, taking account of the Shepway SFRA and draft Water Cycle Report
 - **Travel, Access and Connectivity** – including highway and public transport accessibility, pedestrian and cycle linkages to schools and the High Street
- 1.5.4 In preparing this assessment a range of third party information has been reviewed, which includes reports and appraisals which have been provided by the respective site land owner(s) and their representatives. Information provided by SDC from the following sources has also been reviewed:
- Environment Agency;
 - Southern Water;
 - Kent County Council:
 - Kent Highway Services
 - Education and Property Departments
 - Archaeology Team
- 1.5.5 The advice and recommendations presented within this report therefore build on the technical information referred to above. As such, the report is essentially divided into two halves, the first presenting a review of the technical information (**CHAPTERS 2 – 5**) and the second providing guidance on the emerging policy content (**CHAPTER 6**).



Site Location Plan - Core Development Area

2 Planning

2.1 The Proposed Site

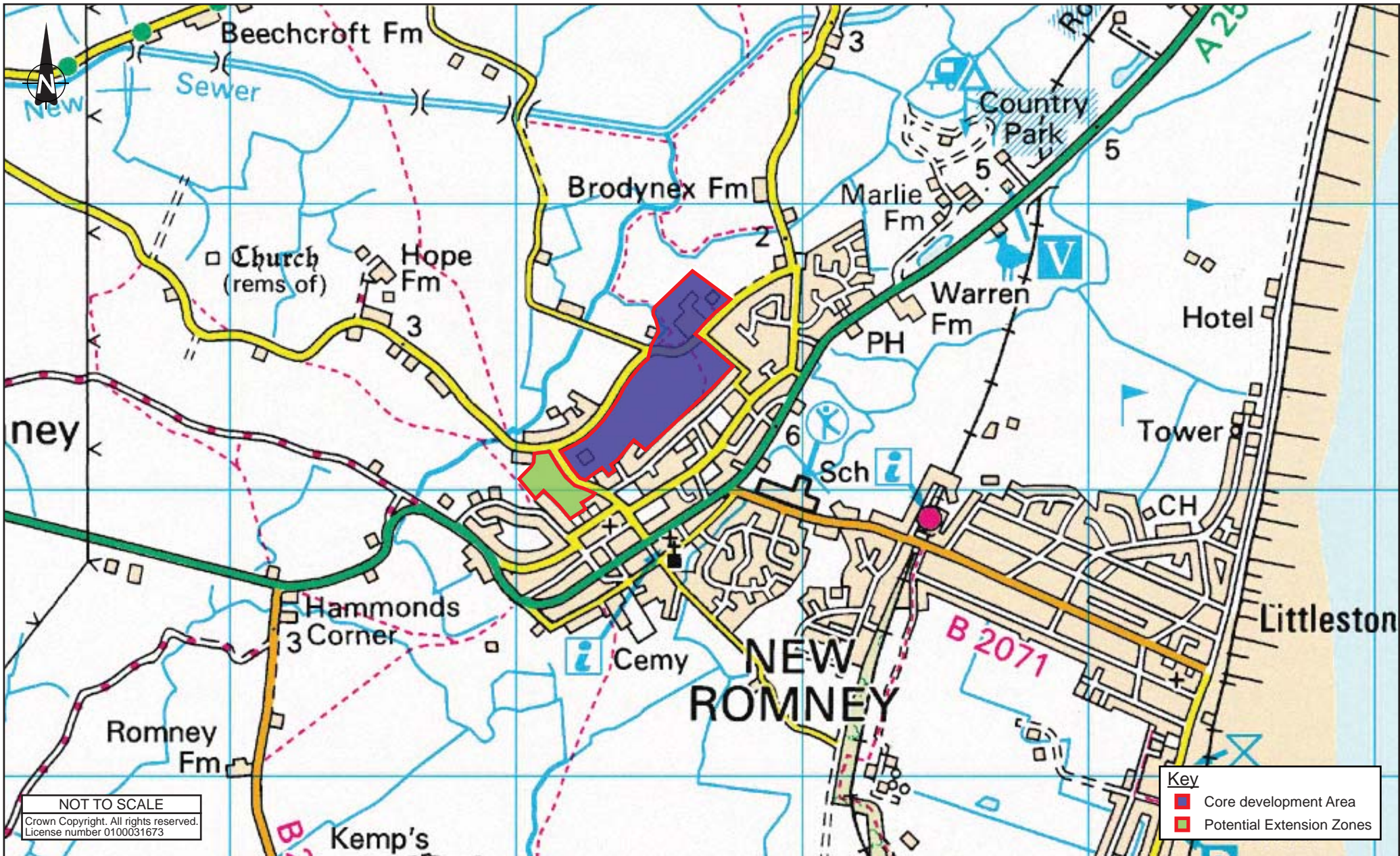
- 2.1.1 In developing our policy advice, our approach has fundamentally been planning-led. With this in mind, whilst it is noted that the site is divided between a number of land owners this is not at all uncommon for developments of this potential scale and this is not therefore considered to be an undue constraint on the overall delivery of the strategic allocation.
- 2.1.2 Notwithstanding this, it will be essential that the landowners and their representatives work together within a joined-up framework which will need to be guided by an overall vision for the development, set out within a comprehensive masterplan for the site.
- 2.1.3 The broad development proposals for c 300 residential dwellings are noted and it is considered that the site is suitable for this form and scale of development. It is also noted however that there are a number of constraints which may affect the overall deliverability of this development option on the site (discussed in more detail in **CHAPTERS 3-5**).
- 2.1.4 With this in mind, consideration has been given to the wording of the allocation which SDC propose through the Core Strategy. As such, the initial consideration was for the policy to take the site forward as a broad location or 'Area of Search' with the intention being that some level of flexibility would be included should alternative sites or parcels need to be incorporated in order to deliver a comprehensive development in line with SDC's aspirations.
- 2.1.5 An alternative approach which could be adopted would be to promote the site as a strategic allocation within the context of the policy wording set out within this report, in order to best inform the comprehensive masterplan which will be required. This approach would also allow further certainty to be afforded to the developers and through the preparation of the site masterplan, will potentially allow the development to come forward in a series of phases or within a single phase, providing that these approaches accord with the overall site development strategy.
- 2.1.6 Notwithstanding this, careful consideration has been given to the possible development options of the site within the context of site deliverability. As such, it has been proposed that a 'core' development area be promoted through the Core Strategy. A further parcel of land is located to the west of the 'site' referred to as 'Land to the West of Ashford Road'. A plan showing these parcels in relation to the 'core' development area is included at **FIGURE 2.1**.
- 2.1.7 The 'core' development area is therefore the site which was previously identified by SDC for future potential residential development, as shown at **FIGURE 1.1**. The site falls under the ownership of four different private landowners.
- 2.1.8 In addition, it should be noted that a central parcel of the 'core site' land is owned by Kent County Council and is currently used for playing fields, associated with St Nicholas School.
- 2.1.9 In light of the above, consideration has been given to the development options which exist for the 'core' development area in isolation to and in combination with the additional parcels of land, as well as that owned by KCC. Further comment is provided on this matter, later in this report.

2.2 KCC Land

- 2.2.1 It has been identified that any future masterplan for the site will need to include an allowance for the land currently located within the central portion of the 'core' development site, which is owned by KCC and currently used for school playing fields.
- 2.2.2 Consultations to date have confirmed that KCC will wish to retain school playing fields within the site and that the location of these should not compromise the journey of school children to and from them.
- 2.2.3 KCC have indicated however, that they will not require the full existing land parcel to be retained for these purposes, meaning that the surplus area can be included within the developable land allocation. Consultation between KCC and SDC to date has indicated that of the 1.86ha parcel of land which is currently owned by KCC, they would wish to retain 0.7ha for the school playing fields.
- 2.2.4 There is however, an existing tree belt on the KCC land parcel which will need to be sensitively reviewed and incorporated within any future masterplan. It is also recommended that through liaison with St Nicholas School and KCC, that consideration be given to the potential dual use of the school playing fields, as public open space within the development, through the masterplan process.

2.3 Public Open Space and Local Facilities

- 2.3.1 Discussions with SDC have previously indicated that a Public Open Space (POS) assessment has not been undertaken for New Romney but that in the absence of this, the improvement of existing facilities within the town would be likely to be more beneficial than the provision of new facilities on the site itself. Further discussions with SDC, KCC and Sport England will however, be necessary.
- 2.3.2 In terms of local facilities, New Romney comprises a relatively significant hub within the southern region of the Shepway District. As such, there are a number of local shops, schools, community facilities and doctor and dentist surgeries available. Discussions with SDC have therefore indicated that the development would be unlikely to be required to provide any such new facilities.
- 2.3.3 In order to adequately integrate the development with the existing fabric of New Romney town, it is recommended however that appropriate contributions are sought from the development through the relevant s106 process.
- 2.3.4 A proportional approach will need to be taken to any such contributions as the development could potentially come forward in phases. On site infrastructure as well as off site mitigation measures should therefore be funded equally by the developers and the appropriate funding levels should be calculated in advance of the first parcel of the development being granted planning permission. This will not only help to ensure equity between the developer partners but will also contribute towards the safeguarding of the delivery of the overall strategic development.



Site Location Plan - with Extension Zones

Folkestone
Hythe & Romney Marsh
Shepway District Council

www.shepway.gov.uk

Figure 2.1

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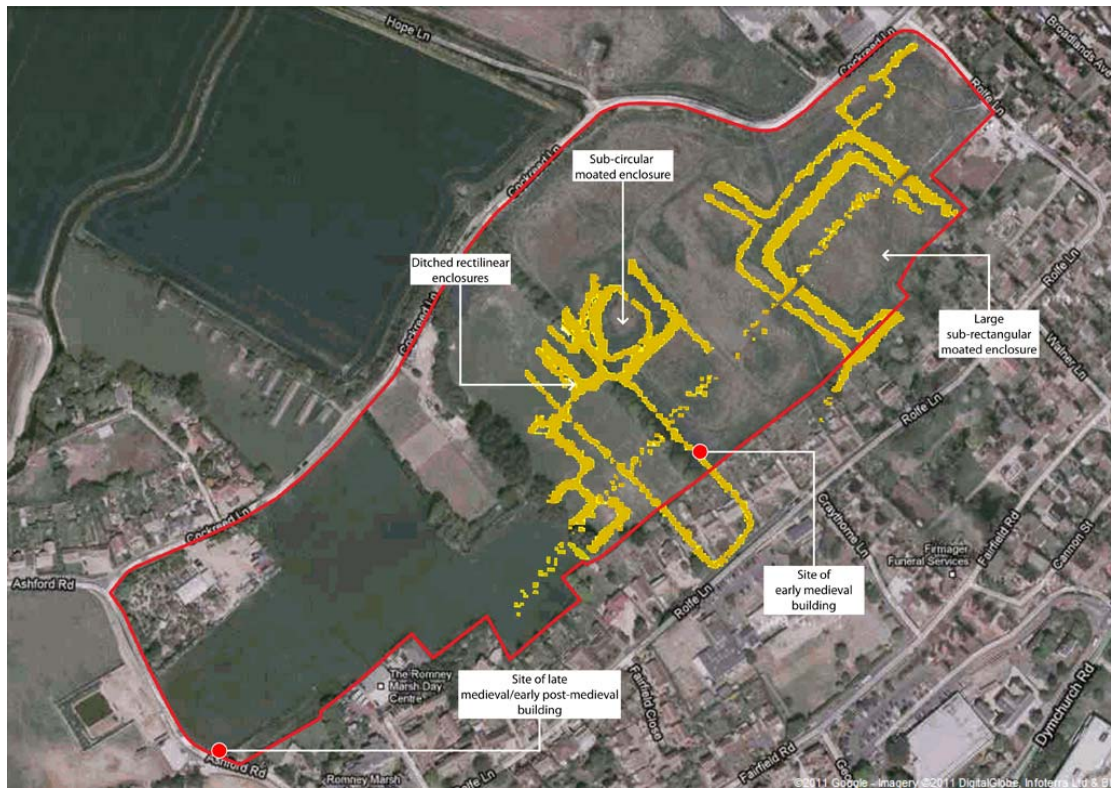
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3 Archaeology

3.1 Review of Background Information

- 3.1.1 The proposed allocation site is located on the northern fringe of the historic medieval Cinque Port and market town of New Romney. Archaeological investigation in the form of both desk-based research and field surveys have been undertaken and have identified an extensive and significant archaeological resource in the north-eastern half of the proposed allocation site and identified further archaeological potential in the south-western half of the proposed allocation site.
- 3.1.2 A number of documents and sources were reviewed in order to understand the known archaeological constraints and opportunities presented by the proposed allocation site. These included:
- an archaeological evaluation report presenting the results of an archaeological trial trench evaluation undertaken within the north-eastern half of the proposed allocation site (ASE 2010);
 - a desk-based archaeological assessment prepared in September 2010 by the Canterbury Archaeological Trust (CAT) for the south-western half of the proposed allocation site;
 - the Archaeological Assessment document for New Romney, prepared by KCC's Heritage Conservation Group as part of the Kent Historic Towns Survey (KCC, 2004);
 - records for heritage assets within and surrounding the proposed allocation site held by the online Kent Historic Environment Record (HER) (<http://www.kent.gov.uk/ExploringKentsPast/>);
 - a letter from Wendy Rogers, Senior Archaeologist for Kent County Council's (KCC) Heritage Conservation Group to Shepway District Council outlining key archaeological issues; and,
 - a letter from Paul Chadwick of CgMs Consulting (consultants to one of the landowners) summarising the results and implications of archaeological investigations undertaken on the north-eastern half of the proposed allocation site.
- 3.1.3 Telephone consultation was also undertaken with Wendy Rogers, Senior Archaeologist at KCC Heritage Conservation Group to ensure that the results of the previous archaeological investigations on the site and the significance of the archaeological resource were fully understood.
- 3.1.4 Examination of the available sources has identified the key archaeological constraints known within the proposed allocation site. These are illustrated at **FIGURE 3.1** below.
- 3.1.5 In the north-eastern half of the proposed allocation site the Kent HER records a series of prominent cropmarks representing a large sub-rectangular medieval moated site, a second smaller moated site and the remains of a field system (Kent HER number TR02 NE15). The earthworks which produce the crop marks are known to have been levelled sometime shortly after the publication of the 1948 Ordnance Survey map.

FIGURE 3.1 Known Archaeological Resource, within the 'Core' Development Area



- 3.1.6 A programme of archaeological investigation comprising geophysical survey and subsequent targeted trial trench evaluation were undertaken during 2010 to confirm the date, extent, depth, character, survival and significance of the medieval moated complex and associated cropmarks.
- 3.1.7 The earliest archaeological remains were identified in the south-west corner of the evaluated area comprising the remains of a timber built structure possibly dating to the 13th century or earlier. Evidence of late 13th to early 14th occupation was also recorded in this part of the site (ASE 2010).
- 3.1.8 The presence of the two moated enclosures was also confirmed. In the west of the evaluated area a sub-circular or 'D-shaped' moated enclosure was confirmed although no internal features were present. This smaller enclosure may form an early precursor to the larger sub-rectangular moated site immediately to the northeast, although its character and function was not determined by the trial trench evaluation.
- 3.1.9 The large sub-rectangular moated enclosure measures some 80m by 90m and was probably fed by a man-made feeder channel linked to a natural water course. Investigation of the internal area within the moat revealed limited evidence for occupation activity or structures in the form of two gullies or possible beam slot terminals and a pit (ASE 2010). No evidence for a principal dwelling or medieval manor house was recovered and significant evidence for modern ground disturbance having truncated or removed any shallow features was recorded.
- 3.1.10 Evidence recovered from the deposits filling the large ditches and moated enclosures indicated that there is good survival of palaeo-environmental remains that have the potential to provide a range of information relating to the environmental conditions and economy of the moated enclosures.

- 3.1.11 A system of linear ditches form a pattern of sub-rectangular enclosures in the area of the smaller enclosure. These may represent a pattern of medieval agricultural fields or occupation enclosures.
- 3.1.12 The large medieval moated enclosure located in the north-eastern half of the proposed allocation site is a substantial heritage asset, but lacks well preserved internal features and direct evidence for a primary dwelling or Manor House. When compared with similar moated sites in Kent that are afforded statutory protection as Scheduled Monuments, the medieval moated enclosures are not judged to be of National Importance (High Significance) but have been assessed as being of Low to Medium significance and will therefore not prohibit allocation of the proposed site for development.
- 3.1.13 The south-western half of the proposed allocation site does not appear to contain such visible archaeological remains in the form of cropmarks. A desk-based archaeological assessment undertaken in 2010 concluded that while the archaeological resource within the south-western half of the proposed allocation is largely unconfirmed, there is the potential for it to contain:
- archaeological remains that contribute to the identification of ancient coastal margins and activity areas “*pertaining to the earlier medieval period of New Romney and its estuary, and may produce evidence of later medieval and early post-medieval occupation*” (CAT 2010; p.11);
 - archaeological remains associated with or similar to the known moated site recorded in the north-western half of the proposed allocation site (*ibid.*)
- 3.1.14 A single archaeological investigation has been undertaken within the southwest corner of the proposed allocation site which recorded the remains of a late medieval or early post-medieval building comprising two walls aligned north-south, a robber trench and a layer of mortared flint and peg-tile demolition material. Further remains associated with the building may extend further into the south-western half of the proposed application site (CAT 2010).
- 3.1.15 The survival of medieval building remains and occupation evidence along the southern boundary of the proposed allocation site suggests that northern edge of the medieval market town may extend into the proposed allocation site. Such remains would be considered important to the understanding of the development and layout of the medieval town.

3.2 Issues for Inclusion in the Design Solution

- 3.2.1 Both the known archaeological remains identified in the north-eastern half and the potential archaeological resource identified in the south-western half of the proposed allocation site presents a number of issues that should be addressed by any masterplan design for future development of the site.
- 3.2.2 Key archaeological constraints in the north-eastern half of the proposed allocation site that will require inclusion within any design solution comprise:
- the large sub-rectangular moated enclosure of later medieval date with limited evidence for the survival of internal features and occupation activity;
 - a smaller (and possible earlier) sub-circular and ‘D-shaped’ enclosure with no identified evidence for internal features or occupation activity;
 - a field system of ditched enclosures adjacent to the smaller moated enclosure; and,

- early medieval building remains and later medieval occupation evidence on the south-eastern boundary of the area.
- 3.2.3 Although not of National Importance the archaeological remains identified in the north-eastern half of the proposed allocation site still represent a substantial constraint to the future development of the proposed allocation site.
- 3.2.4 The masterplan for the development should consider where possible, conserving the archaeological resource, particularly the two moated enclosures, through preservation of the remains *in situ*. This could be achieved within areas of green space, gardens and / or areas of soft landscaping.
- 3.2.5 It is understood that due to other constraints within the proposed allocation site (including the need to provide effective pedestrian and vehicular access), that it may not be possible to preserve the larger moated complex *in situ*. In that event, the design solution should seek to incorporate the distinct layout of the sub-rectangular moat within the pattern of housing, possibly retaining the alignment of the moat within the gardens of properties to reflect this historic feature within the new development.
- 3.2.6 Where it is not possible to conserve the archaeological resource, future development should include the provision for a programme of detailed archaeological mitigation. Mitigation measures may include further trial trench evaluation and detailed open area excavation in advance of construction or a programme of archaeological monitoring and recording as a watching brief during construction activities.
- 3.2.7 Provision of such a programme of archaeological investigation and mitigation would meet the requirements of local planning authorities set out in the policy and guidance of Planning Policy Statement 5 (PPS 5. Policy HE12) and would mitigate the loss of archaeological assets. As set out in PPS 5 the extent of the archaeological mitigation should be proportionate to the significance of the assets. The archaeological investigation and mitigation should also be designed in consultation with the KCC Heritage Conservation Group.
- 3.2.8 The archaeological resource in the south-western half of the proposed allocation site is less well understood and desk-based assessment (CAT 2010) has identified the potential for medieval remains associated with the earlier medieval development of New Romney and its estuary. There is also a clear potential for remains associated with the adjacent moated complex and enclosures to extend into the area and potentially significant evidence of medieval buildings and occupation associated with the medieval town has been identified extending into the southern edge of the proposed allocation site.
- 3.2.9 A desk-based archaeological assessment has been completed for the south-western half of the site but appears to have been unable to provide a sufficient understanding of the potential archaeological resource. The local planning authority in consultation with the KCC Heritage Conservation Group may consider it appropriate for the archaeological potential and the understanding of the significance of any archaeology to be confirmed by a programme of archaeological field evaluation as set out in Policy HE6 of PPS 5.
- 3.2.10 There remains the potential across the whole proposed allocation site for the survival of previously unknown archaeological remains. This risk of discovering unexpected remains is inherent with any development project.

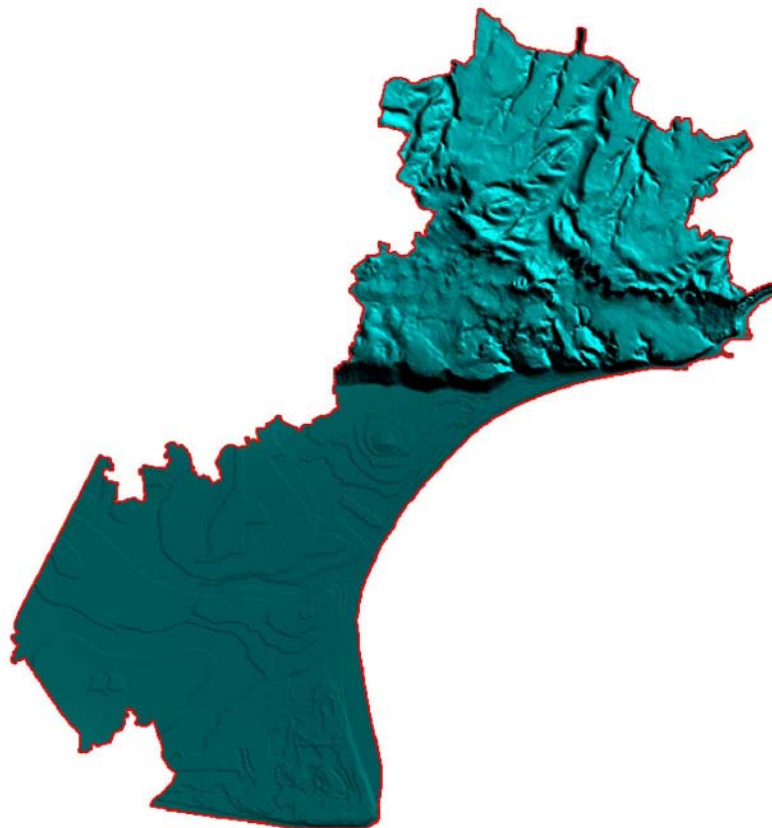
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- 3.2.11 The archaeological resource of the proposed allocation site also present a number of opportunities for integrating the heritage resource into future development beyond merely contributing to an academic understanding of the history and development of New Romney.
 - 3.2.12 The archaeological remains themselves provide an opportunity to provide a strong sense of place, establishing the new development within the historic context and layout of New Romney.
 - 3.2.13 By seeking to conserve the archaeological resource, the physical layout of any new development could be enhanced by incorporating where possible the historic pattern of former medieval settlement, adding a unique dimension to the masterplan design.
 - 3.2.14 The archaeological resource of the proposed allocation site is of significant interest within the local community. Future archaeological investigations provide an opportunity for wider community engagement and participation, not only in the investigations themselves but also through dissemination of the results, open days, displays and information boards.

4 Flooding

4.1 Review of Background Information

- 4.1.1 The topography of Shepway District is split into two distinct areas. Romney Marsh to the south is flat and low lying, bounded by the Royal Military Canal. Areas to the north of Hythe and Folkestone are more undulating and generally more elevated, at between 40m and 150m AOD. The topography of the district is illustrated at **FIGURE 4.1**.
- 4.1.2 Much of the low lying area lies below the mean high water tide level, making it vulnerable to flooding from the sea. Coastal defences of several different types are present along the coastal frontage to protect this area, including 'hard' engineered structures and natural shingle banks that are actively managed to reduce the risk of a breach.
- 4.1.3 A Strategic Flood Risk Assessment (SFRA) was published in June 2009 that examines and quantifies the risk of flooding to the district from all sources. This included modelling the breaching and overtopping of the existing flood defences in numerous locations under several scenarios.
- 4.1.4 A site specific Flood Risk Assessment (FRA) was also commissioned by The New Romney Consortium and published in September 2010. The assessment builds on the earlier SFRA and assesses flood risk specifically in relation to the proposed development site.

FIGURE 4.1 Topography of Shepway District



- 4.1.5 The SFRA and FRA conclude that the principle source of flooding affecting the potential development site is from the sea. The SFRA sets out predicted rises in sea level as a result of climate change, noting the current extreme water level to be 4.96m AOD rising to 6.10m AOD in 2115.
- 4.1.6 The existing ground levels within the site vary between approximately 2.3m and 3.6m AOD, so are significantly below the extreme high water levels for both the current day and for future predicted levels. The site is therefore reliant on existing sea defences to prevent flooding.
- 4.1.7 The study undertaken as part of the SFRA modelled these defences being breached and / or overtopped and mapped the resulting Hazard Ratings (HR). The level of hazard at a specific location is a function of the depth and velocity of water resulting from the breach. A summary of HR values is provided below at **TABLE 4.1**.

TABLE 4.1 Hazard Rating Summary Values

Hazard Rating (HR)	Degree of flood hazard	Description
< 0.75	Low	Caution – shallow flowing water or deep standing water
0.75 to 1.25	Moderate	Dangerous for some, i.e. children – deep or fast flowing water
1.25 to 2.5	Significant	Dangerous for most people – deep fast flowing water
> 2.5	Extreme	Dangerous for all – extreme danger with deep and fast flowing water

- 4.1.8 The study concluded that a large portion of the site would remain dry and the remainder would be subject to a generally low Hazard Rating when current day sea levels were considered, as shown in the mapping extract below, at **FIGURE 4.2**.
- 4.1.9 The area of the site remaining dry does not change significantly when Climate Change is applied to sea levels for the year 2115, but the remainder of the site changes from a generally low Hazard Rating to Significant. The Hazard Rating for 2115 is illustrated at **FIGURE 4.3**.

FIGURE 4.2 Hazard Rating Map Extract: Current Day

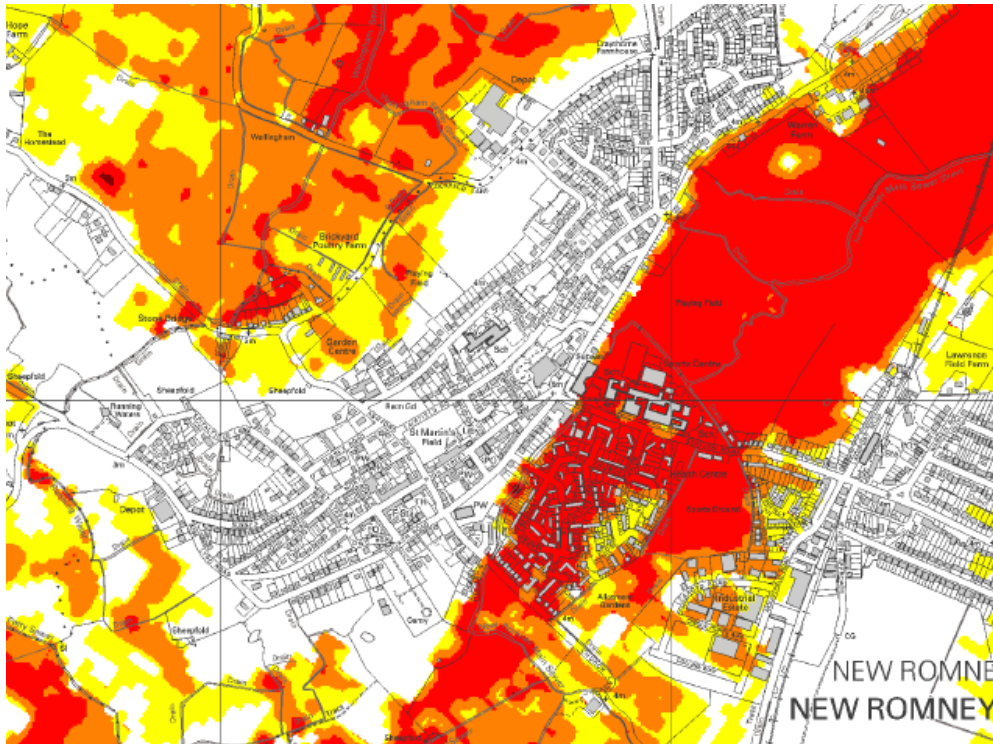
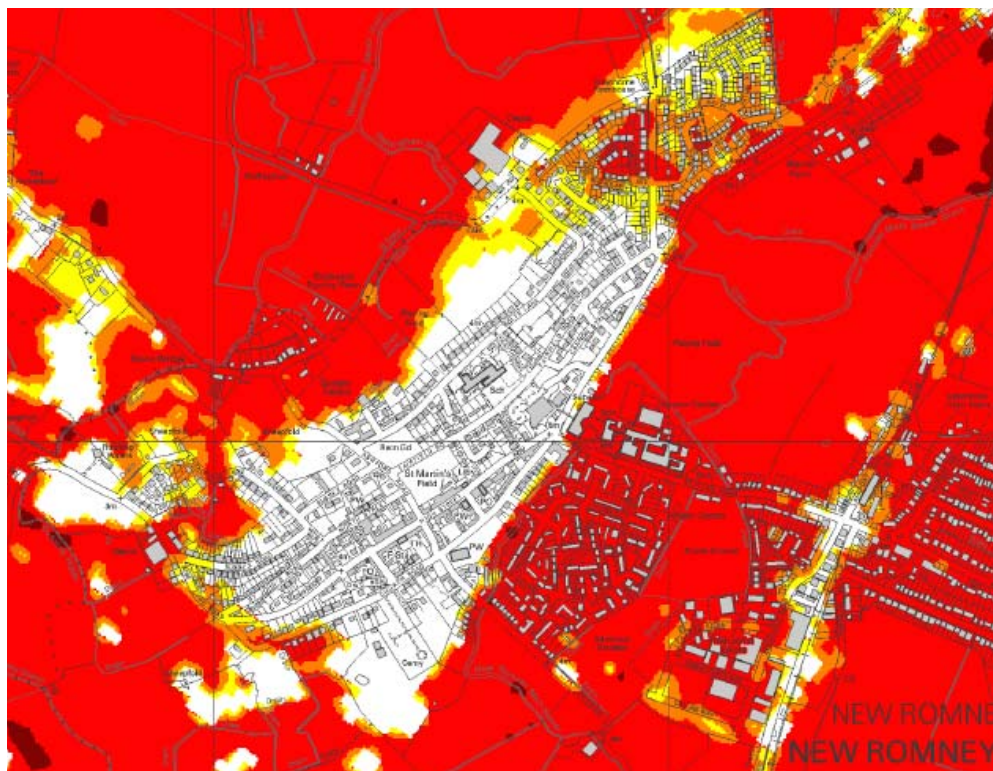


FIGURE 4.3 Hazard Rating Map Extract: With Climate Change (2115)



- 4.1.10 The FRA interrogates the breach analysis study further and establishes that the maximum water level on the site would be 2.93m AOD and maximum water velocities being 0.15m/sec. Water would take approximately 4 hours to reach the site from breaching the sea defences and reach its peak depth in approximately 7 hours after the breach.
- 4.1.11 Historical flooding instances from fluvial (rivers or streams) or pluvial (excessive rainfall) sources are noted in the locality of the site in the SFRA. The FRA has not considered these sources of flood risk in any greater detail.
- 4.1.12 The FRA considers mitigation measures that could be implemented at the site to reduce the risk of flooding and considers the raising of land and the floor levels of dwellings to be the most appropriate solution. The Environment Agency (EA) recommends that the floor level of buildings should be 300mm above flood levels, with this increased to 600mm for floors containing sleeping accommodation. Access routes to and from the development should be constructed at or above predicted flood levels to allow safe access and egress during times of flooding.
- 4.1.13 Raising ground levels to remove the risk of flooding can displace floodwater and increase flood risk elsewhere. The FRA has discussed the impacts of this and notes that, because the site is located in an unconfined floodplain, there will be no impact on flood levels elsewhere. Whilst this considered to be a logical conclusion, there does not appear to have been any consultation with the EA to agree this as a feasible solution.
- 4.1.14 The site is currently greenfield in nature. Development will inevitably involve the covering of existing permeable surfaces with impermeable pavements and roofs, resulting in an increase in surface water runoff to existing sewers and / or water courses. This can be mitigated by the provision of Sustainable Drainage System (SuDS) devices that attenuate water and / or allow water to naturally soak into the ground again.
- 4.1.15 The FRA has made an assessment of the runoff generated by the site both prior to and following development and presents a drainage strategy incorporating open ponds to mitigate this increase, thus seeking to manage an increase in flood risk occurring as a result of the development.
- 4.1.16 A further potential flooding issue has been identified outside of the SFRA (tidal flooding) and the core site FRA. This concerns fluvial flood risk within the western extension zone.
- 4.1.17 The Environment Agency, in a letter to Shepway District Council published in the Strategic Housing Land Availability Assessment, stated in 2010: "We are aware that surface water flooding has occurred on a significant part of this site in recent years. Surface drainage improvements at a number of locations on third party land would be required to reduce flood risk on this site to an acceptable level and owing to existing development, these improvements may not be achievable. We therefore consider these sites should not be considered favourably against the Sequential Test."
- 4.1.18 Although not necessarily concerning all of the land, this matter would warrant further investigation if this extension is required to be considered further.

4.2 Issues for Inclusion in the Design Solution

- 4.2.1 The EA should be consulted on the proposal to raise ground levels to reduce the risk of flooding to areas of the site to confirm it is a satisfactory and implementable solution.

4.2.2 The minimum floor levels that should be considered within the site are as noted below:

- Ground floors of houses (bedrooms upstairs) = 3.23m
- Ground floors or bungalows, apartments or other single story accommodation = 3.53m
- The minimum level of access roads and pavements should be 2.93m

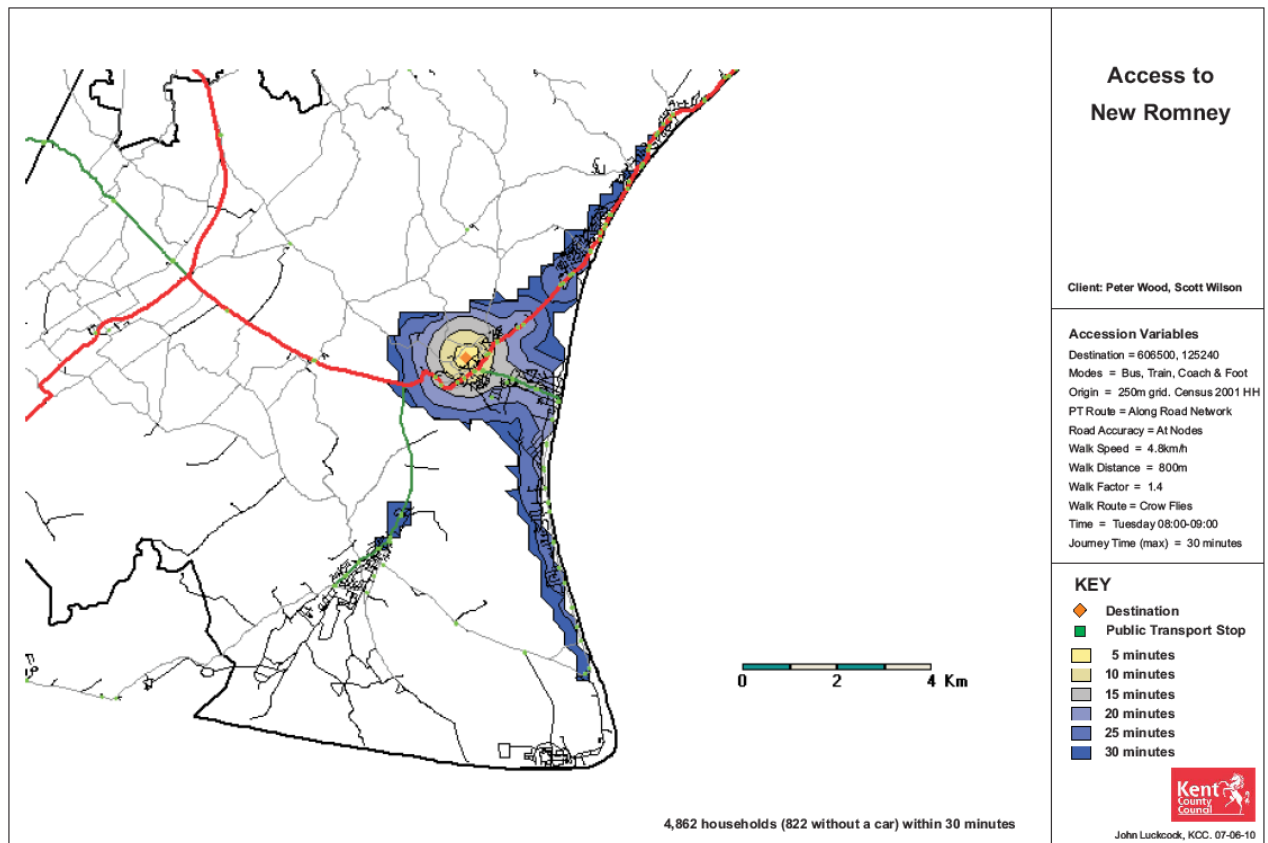
4.2.3 SuDS features containing a total minimum attenuation volume of approximately 1,900m³ will be required to prevent development on the site increasing the rate of surface water runoff entering sewers and / or watercourses.

5 Travel, Access and Connectivity

5.1 Review of Background Information

- 5.1.1 As discussed previously, URS Scott Wilson prepared the Transport Strategy for SDC, forming a key component of the authority’s evidence base for their Core Strategy. As such, reference to the associated Transport Strategy documents has been made in reviewing the potential strategic land allocation at New Romney.
- 5.1.2 The proposed ‘core’ development site is located on the north western border of the town, between Cockreed Lane to north / west and Rolfe Lane to the east and south.
- 5.1.3 Liaison with KCC as part of the development of the Transport Strategy led to a series of accessibility plots being prepared, with the relevant plot for New Romney shown at **FIGURE 5.1**.

FIGURE 5.1 Accessibility Plot – New Romney



- 5.1.4 The plot confirms that the site should be accessible by a range of transport modes including walking and bus. It is anticipated that the town centre facilities will be a 5 – 10 minute walk from the proposed site, with access to Lydd and Dymchurch to the west and Hythe and Folkestone to the east being possible by bus.

Walking and Cycling

- 5.1.5 As discussed, the proposed site is located within walking and cycling distance of the High Street within New Romney, which therefore provides access to local shops, facilities, school, community facilities and bus stops.
- 5.1.6 Whilst the location of the site is considered to be relatively good in this context however, a key constraint exists in that the connections which are available between the site for travel on foot or by bicycle are unattractive and do not conform with relevant minimum guidelines.
- 5.1.7 It was been widely acknowledged throughout the preparation of this document that it will be undesirable for the development to utilise connections along Ashford Road to the west and / or Rolfe Lane to the east as primary walking and cycling links between the site and the town as this will remove focus from the centre of the development. It is therefore considered to be essential that an attractive walking connection, which also makes provision for cyclists, can be made between the central area of the 'core' development area to / from the town centre.
- 5.1.8 There are currently two connections provided between the site and Rolfe Lane to the south, from which onward connections can be made to the town centre. The first of these provides an existing link between St Nicholas School and KCC's playing fields and it is understood that this link is not currently available to the public.
- 5.1.9 The second of the two connections is located further to the east, in the vicinity of the junction between Rolfe Land and Craythorne Lane. This connection is likely to form a key desire line between the future development and the town centre. However, it is noted that the existing link is provided between two residential properties, is close boarded, and is not lit or metalled. Furthermore, the width of the link reduces to approximately 1m in places. The existing link is illustrated below at **FIGURE 5.2**.

FIGURE 5.2 Existing Pedestrian Route between the site and Rolfe Lane



- 5.1.10 In light of the above, careful consideration needs to be given to the possible improvement of the link connection or the use and improvement of the school link, further to the west. Equally, if an alternative link can be provided between the site and Rolfe Lane, then this should also be presented. Any such link should be lit and metalled and be at least 2m wide for its duration, preferably 2.5 for a combined foot / cycle way or 3m for a segregated foot / cycle way.
- 5.1.11 Crossing facilities by way of dropped kerbs and tactile paving would need to be provided where the path meets the public highway on both sides of the carriageway. There is an existing footway on Craythorne Lane both to and beyond the existing school entrance which concludes the connection through to the High Street.
- 5.1.12 It is considered essential that a non-vehicular link of this nature is provided between the central area of the 'core' development site and Rolfe Lane to the south, thereby facilitating high quality links between the development site and the town centre.
- 5.1.13 Finally, it should be noted that there is an existing Public Right of Way (PRoW) which crosses the 'core' development area between Cockreed Lane to the north and the existing pedestrian link onto Rolfe Lane. This PRoW would need to be retained or diverted within the site, in accordance with the Town and Country Planning Act.

Bus

- 5.1.14 Analysis of trip generation forecasting data indicated that based on a development of approximately 300 dwellings, the site would lead to around 200 daily bus trips being generated and as such, it is essential that the bus network serving New Romney is capable of meeting this predicted demand.
- 5.1.15 New Romney is currently served by bus services 101, 102 and 11. The 101 and 102 provide bus travel between the destinations of Lydd and Dover, whilst also calling at Dymchurch, Hythe and Folkestone as well as other smaller destinations within Shepway.
- 5.1.16 The majority of the bus trips are predicted to be to / from Folkestone and this will be achievable in terms of this site, through use of the bus routes 101 and 102. Once at this location, it will then be possible for passengers to travel to other destinations such as Canterbury which are otherwise not accessible by bus from this site.
- 5.1.17 New Romney is relatively well catered for in terms of bus services, with access to residential and commercial areas within the immediate vicinity being available at a frequency of approximately every 30 minutes. However, it is currently not possible to travel to / from Hythe and Folkestone, the major centres within Shepway, within this time period.
- 5.1.18 In addition to this constraint, Stagecoach in East Kent (SEK) who is the bus operator have highlighted the need for a dedicated turning facility or small bus station to be provided within New Romney which will enable buses to turn around and improve bus presence and interchange facilities within the town.

Highway

- 5.1.19 In absolute capacity terms, the role of the Transport Strategy which was prepared in consultation with SDC, KCC and the Highways Agency, was to provide a strategic assessment of the highway within Shepway District, which should be used as a basis for future, more detailed assessments as the strategic developments move forward and planning applications are prepared.

5.1.20 In light of this, the Transport Strategy identified the important role which New Romney plays within the south western region of the Shepway District, both for local communities, as well as for visitors and tourists. As such, congestion within the town and specifically along the High Street is a key concern given the function of the town and set within the context of its attractive environment.

5.1.21 The through movement of traffic, and circulation of residents and tourists which is currently limited by a single pedestrian crossing, therefore need to be carefully considered in relation to any future development proposals that come forward in the area.

5.2 Issues for Inclusion in the Design Solution

5.2.1 Transport and highway analysis of the potential strategic allocation at New Romney has identified that the site is well located in transport terms, in the vicinity of the town centre, to benefit from a range of existing shops, community facilities and bus services.

5.2.2 Notwithstanding this, it has been identified that the development should create a sense of place at the centre of the associated masterplanning ethos, thereby providing a key focus to the development. This should make allowance for vibrancy and activity within the central area of the site which should incorporate a non-vehicular link between the central area of the site and Rolfe Lane to the south, thereby facilitating connections to the town centre. This link should be of high quality and should be attractive to all users.

5.2.3 With the above in mind, consideration has been given to the overall layout and design of the site within the context of relevant best practice, including that set out by the Department for Transport in their 'Manual for Streets' as well as KCC's own Design Guide. As such, it is considered that the site possess significant potential to re-align Cockreed Lane most likely through the down-grading of the existing link and the re-provision of a sensitive local road which can pass through and serve the development site.

5.2.4 It is thus considered that the provision of a highway link of this nature through the development site can contribute towards the establishment of a central area within the site, adding to the developments sense of place through the creation of interaction and activity within the site. This will also facilitate natural surveillance within the development and should incorporate development facing onto the highway.

5.2.5 In terms of off-site transport implications, a full Transport Assessment and Travel Plan should be prepared for the development which will need to identify the expected level of transport impacts which will arise on the local highway network as a result of the development and present appropriate mitigation measures, to the satisfaction of KCC as the local highway authority.

5.2.6 In this context, proportional transport contributions are expected to be sought to mitigate the impact of the development on New Romney whilst promoting local benefits, as appropriate. A balance will therefore need to be found between on site and off site integration measures for the development. It is recommended however, that in addition to the creation of a high quality pedestrian link between the site and the town centre that consideration should be given to the provision of an additional crossing point on New Romney High Street and the improvement of existing bus facilities within the town.

6 Draft Policy

6.1 Approach

6.1.1 The approach that has been adopted in providing SDC with advice regarding the formulation of their strategy concerning potential development at a strategic site at New Romney has been to undertake a comprehensive and objective review of the existing information which has been compiled, by a range of stakeholders.

6.1.2 This review, presented herein, has identified that there are a number of constraints facing potential development on the land which has previously been identified by SDC as part of their Preferred Options report, Policy RM2. These include:

- Archaeological remains on the site;
- Flooding risk, from the sea;
- The need to attenuate increased water runoff rates on the site;
- The need to provide sustainable transport connections in the form of walking and cycling routes both within the site and between the site and the High Street;
- Off site highway mitigation;

6.1.3 In preparing this policy advice note, URS Scott Wilson has consulted closely with SDC, as well as a range of other stakeholders including some of the landowners and their representatives, and officers of Kent County Council as referred to herein.

6.1.4 From the outset, consideration was given to the detailed wording of the allocation which SDC propose through the Core Strategy. Taking into account discussions which have taken place with a wide range of stakeholders, two policy approaches have been considered, either through adopting a broad location or a Strategic Allocation. Through the careful preparation of the masterplan with key stakeholders, it is considered that either option has the potential to facilitate comprehensive development at the site.

6.1.5 It is important that the preferred approach allows certainty to be afforded to both SDC, as well as the developers and through the preparation of a masterplan a framework for a co-ordinated, strategic development to be delivered. Flexibility to allow the development to come forward in phases, if appropriate, should also be considered subject to the establishment of a proportional contribution methodology which will facilitate the timely delivery of the appropriate infrastructure.

6.2 Draft Policy

6.2.1 Discussions with SDC have indicated that New Romney should develop as the residential, business, service, retail and tourist centre for the Romney Marsh. New development should respect the historic character of the town and the established grain of the settlement.

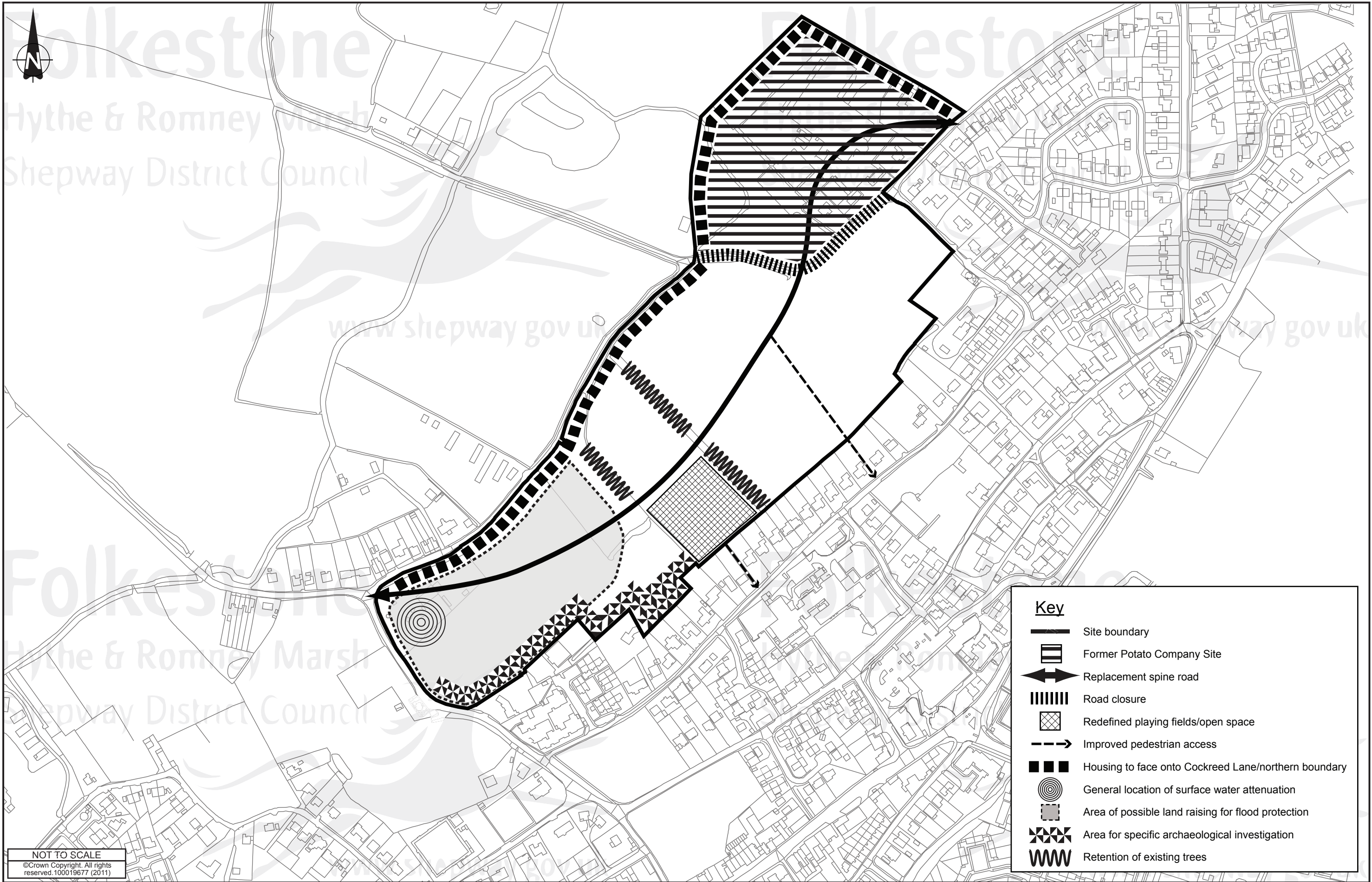
6.2.2 The wider framework for the town therefore includes consideration of the existing high street services, the resident population, opportunities for employment and catering for increased tourist demand. The purpose of this document specifically however, has been to focus on the development opportunities for the town in relation to providing additional residential capacity, to

- cater for future growth. It is therefore noted that the proposed policy presented herein can be incorporated into the wider strategy which is being prepared for New Romney, by SDC.
- 6.2.3 The core area for future planned development has been identified to the north of the town, within the natural urban boundary which is currently created by Cockreed Lane/Potato Company buildings. This land should be brought forward in a comprehensive manner, directed by a single masterplan.
- 6.2.4 To facilitate the delivery of the required amount of housing, two additional parcels of land were identified to the west and east of the 'core' development area. In giving consideration to the development objectives for New Romney it has subsequently been considered that the Potato Company site, located to the east of the previously identified site should be integrated into the 'core development area'.
- 6.2.5 It is noted that this site is already subject to a planning application and that through the considered design of the site, and through incorporation into the wider site masterplan, that a comprehensive development can subsequently be delivered.
- 6.2.6 Should the comprehensive development of the core area be unable to be fulfilled as set out according to the policy objectives summarised below, it is proposed that the extension zone to the west of Ashford Road could be brought forward and appropriately integrated with the 'core development area'.
- 6.2.7 The masterplan for the site 'core' area should therefore confirm how the 'reserve' area can be accommodated without detriment to the overall development objectives.
- 6.2.8 Development of the core area (and extension zone, if appropriate) should meet the following criteria:
- The development as a whole should provide around 300 dwellings and provide a range and size of residential accommodation;
 - Incorporate KCC land for the re-provision of St Nicholas School playing facilities to be provided within a consolidated area, adjacent to the southern site boundary;
 - Ensure that pedestrian linkages southwards to the town centre are improved and prioritised from the central area of the development, in preference to linkages around the periphery of the site irrespective of how the delivery of the development is phased;
 - Prioritise linkages for cyclists, particularly towards the town centre;
 - Incorporate the realignment of Cockreed Lane through the centre of the core development area (east-west) which will be appropriately designed to 20mph providing local frontage access to new housing and consider frontage to the retained school playing fields. Should the Potato Company site come forward, then the realigned Cockreed Lane should also be incorporated within that parcel of the 'core area';
 - Correspondingly, the existing Cockreed Lane connection should be downgraded to facilitate local access only. Closure of part of the lane to avoid through access should also be examined;
 - Provide new housing which overlooks the retained playing fields, thereby creating natural surveillance, and surrounding countryside;

- 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;
- Flooding and surface water attenuation for the overall site should be concentrated in the lowest areas of the site. Associated measures should be sensitive and seek to provide visual and nature conservation enhancement for the benefit of the site and local community;
- Identify appropriate off-site mitigation measures to ameliorate highway impacts and manage drainage demands.

6.3 Accompanying Text

- 6.3.1 Any planning application for the core area either in isolation or incorporating the extension zone to the west should be preceded by, and consistent with, a single masterplan, addressing these objectives and produced in consultation with the local community, the District Council and key stakeholders.
- 6.3.2 Taking this into account, two policy diagrams have been prepared to illustrate the key opportunities and constraints which have been identified in relation to the strategic land allocation at New Romney. The first of these diagrams (**FIGURE 6.1**) considers the 'core' development in isolation, whilst the second diagram (**FIGURE 6.2**) retains the 'core' development area but also includes the potential extension zone located to the west of the site.
- 6.3.3 A comprehensive masterplan can deliver new and attractive housing; the new spine road; consistent frontage to Cockreed Lane and a mix of housing character areas. Family housing is required in the main but the masterplan needs to deliver tenure and market choice through a range of detached; semi-detached and terraced housing. These would predominantly involve a mix of two and three storey dwellings.
- 6.3.4 The development can support new and / or improved facilities both on site and in New Romney. However, the priority is that the development is comprehensive and delivers high quality design for local residents.
- 6.3.5 The approach to development will ensure that the site and its housing can engage positively with both the existing urban area and the rural scene beyond. Associated with the opportunities offered by the new spine road; redefined open space; enhanced pedestrian links, and the need for drainage, landscape and archaeological solutions, different design solutions can be accommodated, creating for the site its own distinct character.



Key	
	Site boundary
	Former Potato Company Site
	Replacement spine road
	Road closure
	Redefined playing fields/open space
	Improved pedestrian access
	Housing to face onto Cockreed Lane/northern boundary
	General location of surface water attenuation
	Area of possible land raising for flood protection
	Area for specific archaeological investigation
	Retention of existing trees

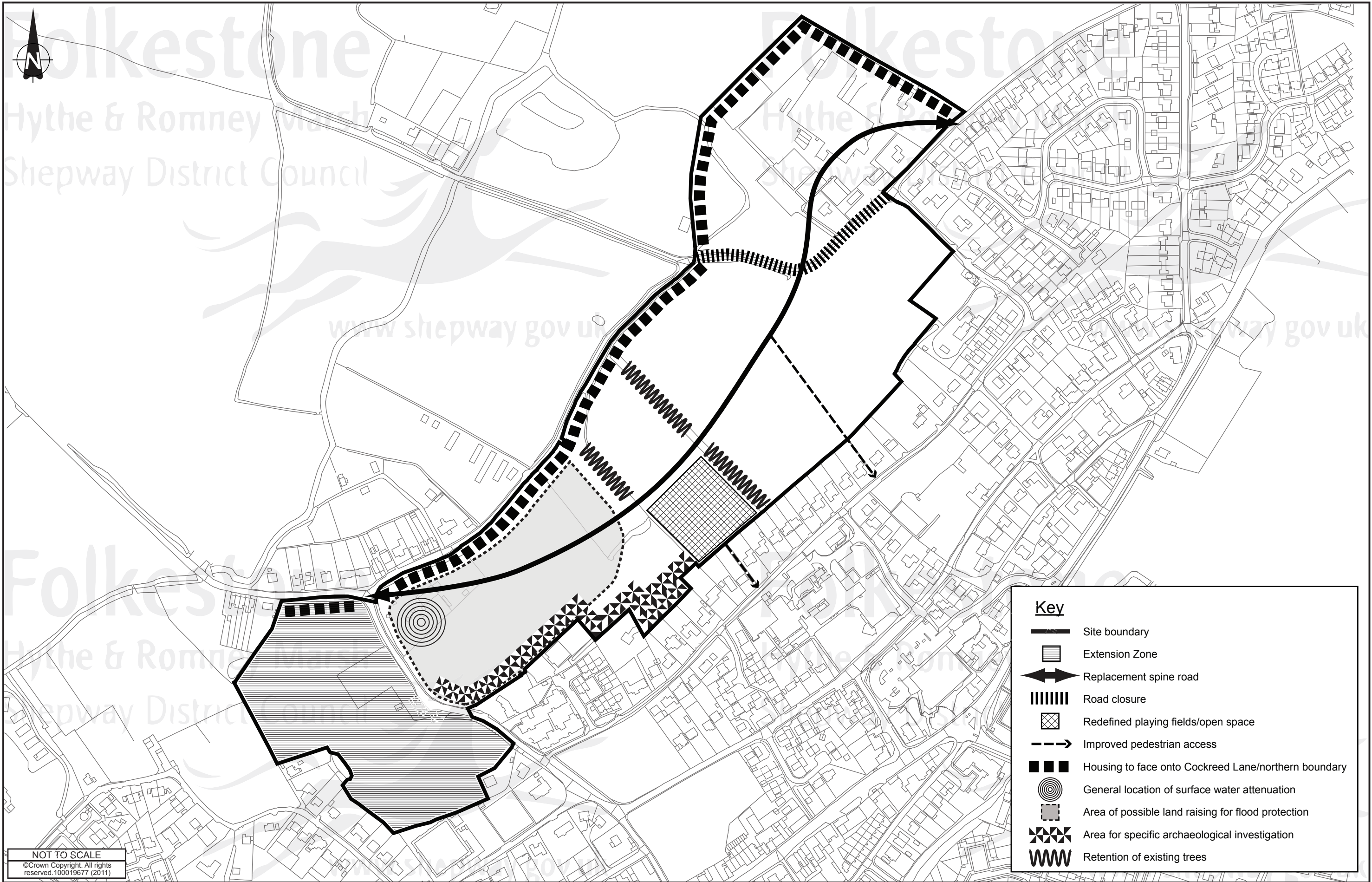
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Key Diagram - 'Core Development Area'



Figure 6.1





Key	
	Site boundary
	Extension Zone
	Replacement spine road
	Road closure
	Redefined playing fields/open space
	Improved pedestrian access
	Housing to face onto Cockreed Lane/northern boundary
	General location of surface water attenuation
	Area of possible land raising for flood protection
	Area for specific archaeological investigation
	Retention of existing trees

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Key Diagram - with Extension Zone



Figure 6.2



Appendix A

RM2 - New Romney Area

Objectives

To ensure the holistic delivery of a high quality housing-led development in order to:

- Increase local housing choice and affordability on sites that are sequentially preferable following the completion of the SFRA and have high sustainability benefits and are located at a strategic position in the Romney Marsh area, adjacent to New Romney Town Centre.
- Ensure provision of housing in the area is sufficient to support local workforce requirements of opportunities such as Dungeness C.
- Provide sufficient housing to support existing local services and infrastructure in the context of identified demographic pressures.
- Aid the functional vitality and viability of New Romney Town Centre.
- Contribute to other key infrastructure requirements within the locality.
- Meets a minimum of level 4 of the Code for Sustainable Homes and provides a significant proportion of its energy requirements through the use of decentralised and renewable or low carbon sources, contributing to reducing the impacts of climate change.

Preferred Option:

The Core Strategy will feature a strategic allocation to deliver a housing-led site to the west of New Romney Town, including the following features:

Development is preceded by, and is consistent with a comprehensive masterplan for all the component sites (inclusive of phasing and management to ensure full delivery) which has been agreed by the council, takes into account landscape impacts, flood risk and integrates with the existing pattern and grain of development within New Romney, meeting with the design and infrastructure policies of the Core Strategy and provides -

- Around 400 new homes including 35% affordable housing and a substantial element of family size houses (in line with the Strategic Housing Market Assessment) including 20% market lifetime homes in accordance with policies LS2 and LS4.
- An assessment of the most suitable specific development locations within the area of the sites in accordance with the land requirements of a landscaping and green infrastructure strategy, any playing field relocation needs, and the findings of the SFRA, PPS25 and policy GS2.
- Specific preparatory studies examining biodiversity, highways/transport, flooding and archaeology.
- Contributes to reducing the impacts of climate change by meeting with the requirements of policy GS3 of the Core Strategy.
- An access strategy that maximises the potential for walking, cycling and the use of public transport whilst ensuring that vehicular access is fully developed based upon the findings of a detailed transport study.
- High quality open space which meets identified needs as informed by the masterplan.
- A high quality design, sensitive to existing residents and the local landscape, not extending to the north of Cockreed Lane.
- Appropriate contributions towards existing and new infrastructure based upon a detailed development appraisal and in accordance with policy CC1.

Appendix B

Current Indicative Site Layout

The final indicative layout addresses the key issues, giving emphasis to transport and flooding raised most frequently by local residents. The issue of on site archeology can be addressed through further studies, however initial studies indicate that the developable area is unlikely to be constrained by onsite archeology.

