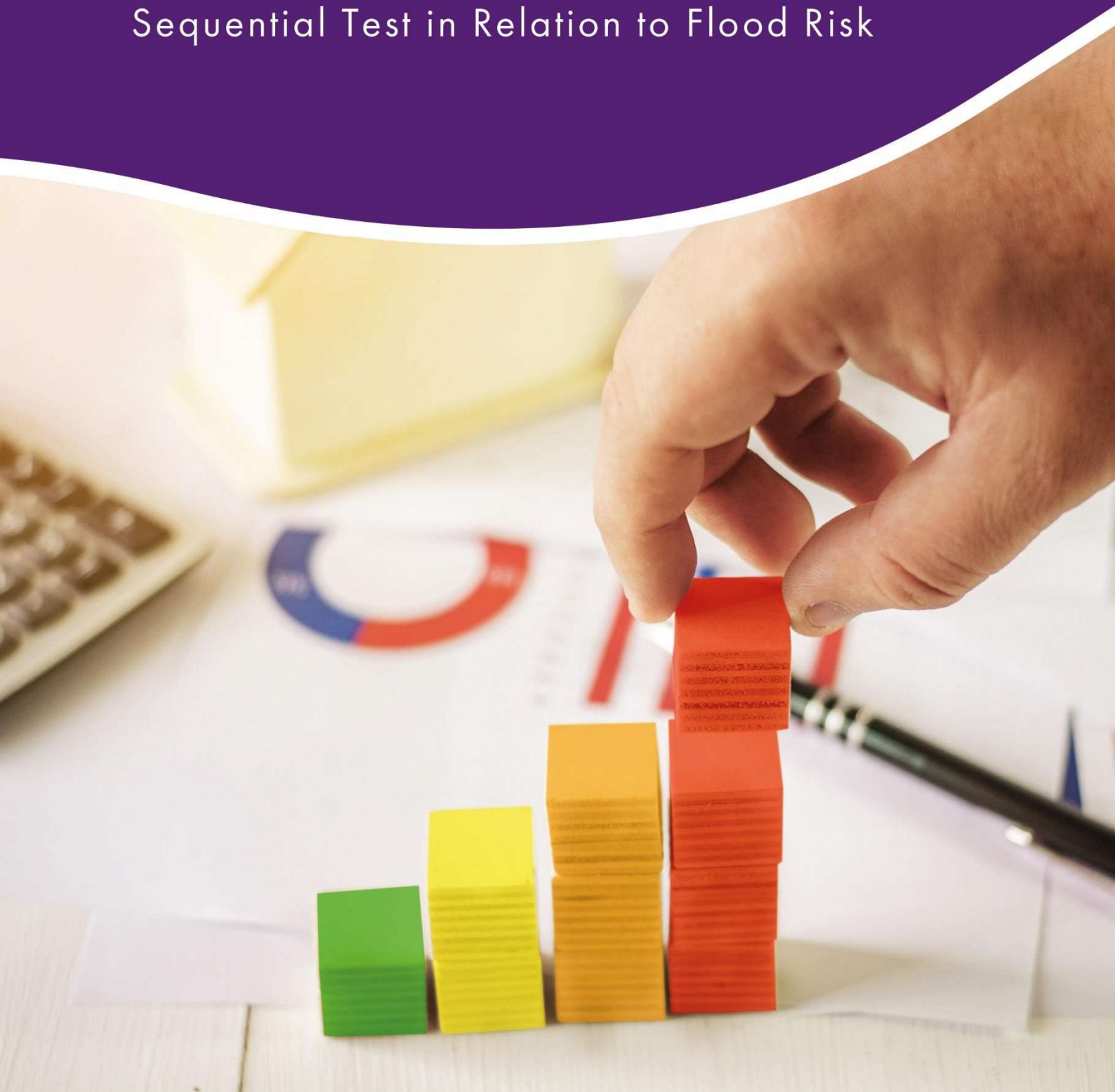


Places and Policies Local Plan - Submission Draft Sequential Test in Relation to Flood Risk



Sequential Test in Relation to Flood Risk (April 2018)

1. Introduction

- 1.1 The purpose of this paper is to set out the District Council's assessment of flood risk and housing allocations in the Submission Draft Places and Policies Local Plan.
- 1.2 This paper was updated in April 2018 following the publication of revised flood maps by the Environment Agency.

2. Policy Background

National

- 2.1 National Planning Policy Framework (NPPF) states that Local Plans should take into account climate change over the longer term and consider factors such as coastal change, water supply and flood risk (paragraph 99).
- 2.2 The NPPF states (paragraph 100) that inappropriate development in areas of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increased flood risk elsewhere.
- 2.3 The Framework continues to state that Local Plans should apply a sequential, risk-based approach to the location of development to avoid, where possible, flood risk to people and property and manage any residual risk, taking account of the impact of climate change by:
 - Applying the **Sequential Test**; and
 - If necessary applying the **Exceptions Test**.
- 2.4 The **Sequential Test** ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The aim is to steer new development in the first instance to the areas of least flood risk, Flood Zone 1. If there are no reasonable available sites in Flood Zone 1 then the local planning authority (LPA) should consider Flood Zone 2 (areas with a medium probability of river or sea flooding) applying the Exceptions Test where necessary. Only where there are no reasonable alternatives in Flood Zones 1 and 2 should Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.
- 2.5 The **Exceptions Test** is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. For the test to be passed:

1. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by the Strategic Flood Risk Assessment (SFRA) where one has been prepared; and
 2. A site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 2.6 According to the Planning Practice Guidance (PPG), “...essentially, the two parts to the Test require proposed development to show that it will provide ‘wider sustainability benefits to the community that outweigh flood risk’, and that it will be ‘safe for its lifetime’, without increasing flood risk elsewhere and where possible reduce flood risk overall”.¹ The PPG continues: “In considering an allocation in a Local Plan, a level 2 Strategic Flood Risk Assessment should inform consideration of the second part of the Exception Test”.²
- 2.7 The PPG also sets out **Flood Risk Vulnerability** and **Flood Risk Compatibility**. The guidance sets out the vulnerability of different uses as a guide. The categories are:
- Essential Infrastructure (including transport routes or power stations needed for operational reasons);
 - Highly Vulnerable (including Police stations, residential caravans);
 - More Vulnerable (Hospitals, dwellings, holiday lets);
 - Less Vulnerable (shops, offices, agricultural buildings); and
 - Water Compatible (Ministry of Defence uses, shipbuilding, water-based recreation).
- 2.8 The full list of uses within each of the categories is set out in the Planning Practice Guidance.³ The PPG sets out the vulnerability of uses against their compatibility with the flood zones as reproduced in the table below.

¹ Planning Practice Guidance, Paragraph: 023 Reference ID: 7-023-20140306

² Planning Practice Guidance, Paragraph: 025 Reference ID: 7-023-20140306

³ See: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Table-2-Flood-Risk-Vulnerability-Classification>

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	✗	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	✗	✗	✗	✓*

Key:

✓ Development is appropriate

✗ Development should not be permitted.

† In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.

* In Flood Zone 3b (functional floodplain) essential infrastructure that has to be there and has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere.

Shepway District Development Plan

2.9 The Shepway District Core Strategy Local Plan was adopted in 2013 and sets out the strategic policies for the district. Core Strategy Policy SS2: Housing and the Economy Growth Strategy sets a target of approximately 8,000 dwellings (*minimum* of 7,000) dwellings up until 2031, a requirement of approximately 20ha gross of industrial, warehousing and offices and 35,000sqm for goods retailing to meet needs of the future population.

2.10 To direct future sustainable development, protect the countryside and reflect the function of towns and villages, the Core Strategy sets out a Settlement Hierarchy in Table 4.3. The diagram below sets out the distribution of this hierarchy.

2.11 To reflect the different characteristics of the district and to ensure that all areas can grow sustainably, the Strategy divides the district into three character areas,

the Urban Area (Folkestone and Hythe), the North Downs and the Romney Marsh. The broad character areas are illustrated in the diagram below.



2.12 The Core Strategy seeks to allocate 75 per cent of the overall residential development in the Urban Character area, 15 per cent in the North Downs area and 10 per cent in the Romney Marsh area (these are to the nearest +/- 5%). The table below sets out the overall requirement (including +5 per cent), identified in the Core Strategy, for each of the three character areas and the residual amount (deducting the strategic allocations and sites with planning permissions) that would need to be allocated in the Places and Policies Local Plan.

2.13 The table below sets out the housing land supply position for the Submission Draft Places and Policies Local Plan, using information from the monitoring year 2016/17.

2.14 The table shows the Core Strategy housing requirement for the three character areas in the left hand column (column A). The table then totals the new housing development that has already taken place since the base date of the Core Strategy in 2006 through completed dwellings, as well as sites under

construction and unimplemented permissions at 2017 (columns B, C and D). To this total is added the allocations in this plan and an allowance for the Core Strategy strategic site at New Romney, excluding those sites that had planning permission in 2017 (column E). An allowance is made for 'windfall' delivery (small sites of 1 to 4 dwellings that are not allocated but continue to come forward for development) in accordance with the Core Strategy (column F). The right hand column (column G) gives the total projected supply over the Core Strategy plan period (2006-2031).

2.15 Regarding the figures it should be noted that:

- An allowance of 10 per cent has been made for non-delivery for permissions that have not started on site (column D) and for the Local Plan and Core Strategy allocations (column E). The allowance for non-delivery is a conservative estimate to take account of planning permissions that may lapse (where development does not start before the date specified in the permission) and allocated sites that may be developed for fewer homes than identified in the relevant policy or where delivery extends beyond the end of the plan period; and
- The windfall allowance is as set out in the Core Strategy and supporting evidence, where just under 1,000 dwellings is allowed for the final 13 years of the plan period (2018/19-2030/31). For the table, a windfall allowance of 11 years has been included, to avoid double-counting with small sites with planning permission (column D).

2.16 Comparison of columns A and G shows that the Core Strategy's *minimum* housing land requirements will be met for all three character areas, with sufficient flexibility to take account of unforeseen circumstances.

Places and Policies Local Plan - Housing Land Supply Position 2006-31						
Minimum Targets	Supply and Total Projected Delivery					
A	B	C	D	E	F	G
Number of homes	Completions 06/07-16/17	Under construction at 2017	Permissions not started at 2017	Places & Policies Local Plan/Core Strategy	Windfall	Total projected delivery (B + C + D + E + F)
Urban Area - 75 per cent of total (+/- 5 per cent)						
6,563	2,159	464	3,094	859	539	7,115
Romney Marsh Area - 10 per cent of total (+/- 5 per cent)						
875	475	64	308	358	165	1,370
North Downs Area - 15 per cent of total (+/- 5 per cent)						
1,313	557	101	326	395	121	1,500
District Total						
8,750	3,191	629	3,728	1,612	825	9,985

2.13 With regard to flood risk in the district, the latest mapping on the Environment Agency's website indicates that the majority of the Romney Marsh is within Flood Zone 3. The only areas outside Flood Zones 2 and 3 in the Romney Marsh character area are small areas at Lydd, New Romney and Dungeness.

2.14 The Core Strategy (through Policy SS3: Place-Shaping and Sustainable Settlements Strategy), therefore, recognises that residential development in Flood Zones 2 and 3 will be necessary to support the sustainable growth of the district. It states that in the consideration of appropriate site options for the sequential test, proposals should identify locational alternatives with regard to addressing the need for sustainable growth applicable to the three character areas.

2.15 Paragraph 4.72 of the Core Strategy then states that within the three character areas, where there are locations that are in lesser risk and could provide a similar development to sites being proposed, then the presumption should be that the

proposed development should be refused. If no suitable sites outside Flood Zones 2 and 3 are available, then consideration should be given to minimising hazards to life and property utilising Shepway's SFRA.

2.16 Policy SS3: Place-Shaping and Sustainable Settlements Strategy states that all development must demonstrate how alternative options have been considered with a sequential approach taken for applicable uses (point (b) of the policy). In considering appropriate site options, proposals should identify locational alternatives applicable to the Romney Marsh Area, or Urban Area or North Downs Area.

2.17 Where there are no suitable alternatives within areas at lower risk of flooding, site-specific evidence will be required to demonstrate that the proposal is safe and meets the sequential approach within the applicable character area of Shepway of the three identified. If required, the proposal must also demonstrate that it meets the exception test set out in national policy (Policy SS3: Place-Shaping and Sustainable Settlements Strategy, point (c)). As noted in paragraph 2.5 above, the first part of the exception test requires the demonstration of wider sustainability benefits to the community that outweigh flood risk. The second part requires the developer to provide evidence that the proposed development would be safe and that people will not be exposed to hazardous flooding from any source. This should include consideration of:

- The design of any flood defence infrastructure;
- Access and egress;
- Operation and maintenance;
- Design of development to manage and reduce flood risk wherever possible;
- Resident awareness;
- Flood warning and evacuation procedures; and
- Any funding arrangements necessary for implementing these measures.⁴

Policy SS3 also states that all applications for replacement dwellings, should, via detailed design and the incorporation of flood resilient construction measures, reduce the risk of life of occupants and seek provisions to improve flood risk management.

⁴ Planning Practice Guidance, Paragraph: 038 Reference ID: 7-038-20140306

3. Evidence Base Documents

Shepway Strategic Flood Risk Assessment (SFRA) Phase II

3.1 The District Council commissioned an updated SFRA Phase II in 2015. This assessment has provided quantifiable flood hazard information for the district, taking into account changes in climate change predictions and any recent developments in the district. The key requirements were to:

- Collate all known sources of flooding (including river and surface water)
- Examine the impact of an extreme flooding event that exceeds the standard of protection provided by the existing coastal flood defences;
- Quantify the depth velocity and other key parameters of flood events that result from the overtopping or failure of the existing defences; and
- Map the outputs of the analysis.

3.2 The work resulted in flood mapping that identified four classifications from 'mild' to 'extreme' hazard.

3.3 The results have been used to identify appropriate sites with a lower risk of flooding following Government advice in the NPPF and PPG for each of the character areas set out in the Core Strategy.

South Foreland to Beachy Head Shoreline Management Plan

3.4 The South Foreland to Beachy Head Shoreline Management Plan (South East Coastal Group, April 2006) sets out management policies for the next 100 years. This document has been examined as part of the SFRA process. For most of the coastline the management policy is 'hold the line'. Only the Lydd and Hythe Ranges are identified as 'managed realignment' over the 100 year period.

Folkestone to Cliff End Flood Risk Management Strategy

3.5 The Folkestone to Cliff End Flood Risk Management Strategy (Environment Agency, February 2015)⁶ sits below the Shoreline Management Plan and identifies schemes for coastal erosion. Works have been undertaken in the district but those outstanding consist of Hythe Ranges, Lydd Ranges and a small stretch at Greatstone to Romney Sands. These are likely to start in 2018.

Strategic Housing Land Availability Assessment (SHLAA)

3.6 The SHLAA is an important evidence base source in the preparation of Local Plans and is a requirement of the NPPF. The purpose of the assessment is to:

- Identify sites and broad locations with potential for development;

⁶ Available to view at: <https://www.gov.uk/government/publications/folkestone-to-cliff-end-strategy>

- Assess their development potential; and
 - Assess their suitability for development and the likelihood of it coming forward.
- 3.7 The SHLAA assessment does not determine whether a site should be allocated for development because not all sites considered in the assessment will be suitable (for example because of policy constraints or if they are undeliverable). It is the role of the assessment to provide information on the range of sites that are available to meet the overall housing need (irrespective of whether it is market housing or affordable), but it is for the Places and Policies Local Plan to determine which of those sites are the most suitable to meet those needs.
- 3.8 The assessment process consisted of five stages. These were:
- **Stage 1 – Initial Assessment on Suitability** - This stage eliminated any sites there were not considered suitable in principle due to their location within sensitive areas (such as designated European nature conservation sites or within 'extreme' flood hazard);
 - **Stage 2 – Detailed Assessment on Suitability** - This stage assesses the remaining sites against further suitability criteria, such as if a site is contrary to adopted Core Strategy Local Plan policies (such as the settlement hierarchy). This stage also considered sites within Flood Zone 2 and 3 and the Hazard mapping in the SFRA;
 - **Stage 3 – Availability** - The third stage is to assess if there are any issues relating to a site, such as ownership problems or operational requirements that would stop the site being developed;
 - **Stage 4 – Achievability** - This is a judgement on the economic viability of the site and if there is a reasonable prospect that the site can be developed now or in the future; and
 - **Stage 5 – Conclusions** - The conclusion reflects stages 1 to 4 and raises any particularly important issues, such as if a site is considered necessary for the regeneration of the area. Comments were also sought from specific bodies including Kent County Council Highways, Natural England and the Environment Agency.
- 3.9 A 'traffic light' scoring methodology was used to grade the sites. Flood risk was considered at the first and second stages of the process. The Environment Agency provided comments or highlighted concerns relating to any sites in the final stage of the process.
- 3.10 The SHLAA has been used as the source for assessing alternative available sites in lower flood risk areas for the Sequential Test.

Sustainability Assessment (SA)

- 3.11 A Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable

development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

- 3.12 This process is an opportunity to consider ways by which the Local Plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the development of the Local Plan.
- 3.13 The preferred sites and any reasonable alternatives have been assessed against fourteen SA objectives (including flood risk). These results have been used to inform the Exceptions Test for any sites in Flood Zone 3.

4. Site Assessments

- 4.1 The sites identified and assessed in the SHLAA are set out in the tables in Appendix 1. As the Core Strategy seeks development in the three character areas, these have been split into the Urban, the North Downs and New Romney areas. The tables for the preferred sites in each character area have then been split to reflect the Flood Zones they are within (one table for Flood Zone 1 and then another for Flood Zones 2 and 3). The alternative sites considered are set out in the final table in each section.
- 4.2 Preferred sites that fell within Flood Zones 2 and 3, were then subject to the sequential and, where necessary, the exception tests.
- 4.3 With regard to the exceptions test (see paragraph 2.5 of this paper):
- The first question considers the SA assessment and any other benefits of the proposed allocation that would outweigh the flood risk;
 - The second question has been informed by the Shepway SFRA Phase II report (PPG paragraph 25).
- 4.4 These tests are set out in Sections 5 to 7 below, under each of the three character areas: the Urban Area, North Downs Area and Romney Marsh Area.

5 Urban Character Area

5.1 There are 20 sites proposed for residential allocation in the Urban Area in the Submission Draft Places and Policies Local Plan. Of these, only two fall within Flood Zones 2 and 3. These are:

- Smith's Medical Campus, Boundary Road, Hythe (Policy UA13); and
- Hythe Swimming Pool site, Hythe (Policy UA19).

In the initial assessment Princes Parade (Policy UA18) fell within Flood Zone 3 but the updated flood maps indicate that the site is no longer within it.

Smiths Medical Campus, Hythe (Policy UA13)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
<p>The Smith's Medical Campus, Hythe is currently 3.2 ha of commercial land (B1 and B2). The proposal allocation is for a mixed-use scheme including employment (B1) and residential (approximately 80 dwellings).</p> <p>The owners have relocated to more modern premises and are disposing of this land.</p>	<p>The sites below are larger but could be comparable if a smaller area was considered.</p>	<p>There are no directly comparable sites in an area with lower Flood Risk, of this size or that could provide 80 dwellings/ employment use.</p> <p>The larger sites considered are not suitable due to other constraints and these do not outweigh the flood risk of the Smith's Medical Site.</p> <p>The site should be considered under the Exceptions Test.</p>
	<p>Site 688: Upper Works Site, Castle Hill (Flood Zone 1): A much larger site at 5ha but its location is divorced from the town with possible detrimental impacts on the AONB, Ancient Monument, SSSI and SAC designations. The site is, therefore, not suitable for development.</p>	
	<p>Site 405: Land at Coolinge Lane, West Folkestone (Flood Zone 1): 4.54 ha site located in west Folkestone. The site was considered favourably at the Preferred Option stage but objections raised by Sport England resulted in this site being removed until relevant evidence for the loss of playing fields could be provided. The site is therefore, not suitable for development.</p>	
	<p>Site 158: Vale Farm, Horne Street, Folkestone (Flood Zone 1): 4.6 ha site in total but the SHLAA concluded that if this was to be developed only a smaller area (1.3 ha) should be considered. Overall, development of the site would have a detrimental impact on landscape designations and there are highway concerns in relation to traffic on Horne Street. The site is therefore not suitable for development.</p>	
	<p>Site 615: Land north west of Blackhouse Hill, Hythe (Flood Zone 1): Large site consisting of an open field. The site is within the AONB and any development here would be detrimental to its special character.</p>	

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared

- 5.2 The Smith's Medical Campus is a previously developed site, the redevelopment of which would provide new homes and business opportunities identified in the adopted Core Strategy to meet the future needs of the local community. The site is in a sustainable location close to local facilities and other residential development. The site has few other constraints.
- 5.3 The site has only scored negatively in the SA on flood risk, but this could be mitigated when Core Strategy Policy SS3: Place-Shaping and Sustainable Settlements Strategy is taken into consideration. The site scored positively or very positively on the following sustainability objectives:

SA Objectives
3. Promote community vibrancy
5. Improve the provision of homes, including affordable housing
6. Support the creation of high quality and diverse employment opportunities
8(c) Townscape: regeneration
10(a) Reduce the need to travel
10(b) Increase opportunities to choose sustainable transport modes
11(a) Efficient use of land
11(c) Land contamination

- 5.4 The site was neutral on the remaining objectives in the SA.
- 5.5 With regard to flood risk, the SFRA indicates that the site does not fall within the 'extreme' hazard in 2115. Half of the site falls outside of the flood hazard areas whilst the other half is within 'significant'.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

- 5.6 The SFRA Phase II indicates that the site should be safe for its lifetime until 2115. The flood defences in this area are also due to be improved in 2018 which would improve the flood hazard in this area. Any future development would also need to provide a site specific flood risk assessment.

Hythe Swimming Pool, Hythe (Policy UA19)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
The site is 0.5 ha and includes a public swimming pool, which is now coming to the end of its useful life. Development is connected to the Princes Parade development.	Site 444: Land North West of Rectory Road, 1 ha (Flood Zone 1): Although in Flood Zone 1, this site is divorced from Hythe and located in the countryside in the AONB. Not suitable for development.	There are only two sites that are comparable within the urban area and in lower Flood Risk areas. Neither of these are suitable due to their location within the AONB. The site should be considered under the Exceptions Test.
	Site 630 Land adjacent Spring Lane, Seabook, Hythe. 0.49 ha (Flood Zone 1): The site is located within an ancient woodland and a Local Wildlife Site. Not suitable for development.	

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared.

- 5.7 The site would enable a new public pool and centre for the local community to be built at Princes Parade. The existing facility is at the end of its useful life. The site is previously developed and would provide an opportunity for additional dwellings to meet the future requirements set out in the Core Strategy.
- 5.8 The site has only scored negatively in the SA on flood risk, which would be mitigated by requirements in Core Strategy Policy SS3: Place-Shaping and Sustainable Settlements. The site scored positively or very positively on the following objectives:

SA Objectives
3. Promote community vibrancy
5. Improve the provision of homes, including affordable housing
6. Support the creation of high quality and diverse employment opportunities
8(c) Townscape: regeneration
10(a) Reduce the need to travel
11(a) Efficient use of land
11(c) Land contamination
14. Protect and enhance open space and ensure that it meets local needs.

- 5.9 The site was neutral on the remaining objectives in the SA.

5.10 The site allocation has been informed by the SFRA Phase II. The site does not fall within any Flood Hazard areas as identified in the SFRA for the year 2115.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

5.11 The SFRA Phase II indicates that the site would be safe for its lifetime until 2115 as the site does not fall within any flood hazard areas. Any future development would need to provide a site specific flood risk assessment.

6 North Downs Character Area

- 6.1 All the sites allocated in the North Downs Character Area fall within Flood Zone 1 and so no alternatives are considered within this assessment.

7 Romney Marsh Character Area

7.1 The majority of the Romney Marsh Character Area is within Flood Zone 3 but the area benefits from flood defences. Of the fourteen sites allocated in this Character Area, five are within Flood Zone 3, four contain an element of Flood Zones 2 and 3, and two are within Flood Zone 2.

7.2 The sites within Flood Zone 3 are:

- Land west of Ashford Road, New Romney (Policy RM4);
- Former Sands Motel, St Mary's Bay (Policy RM9);
- Car Park, Coast Drive, Greatstone (Policy RM11);
- Land adjacent Moore Close, Brenzett (Policy RM14); and
- Land at Rhee Wall Road, Brenzett (Policy RM14).

7.3 Sites that are within Flood Zones 2 and 3 are:

- The Old Slaughterhouse, 'Rosemary Corner', Brookland (Policy RM12);
- Land north Pod Corner, Brookland (Policy RM13);
- Land adjacent either side of Framlea, Pod Corner, Brookland (Policy RM13);
- Land off Victoria Road West, Littlestone (Policy RM2);

7.4 The sites that fall within Flood Zone 2 are as follows:

- Land off Cherry Gardens, Littlestone (Policy RM1);
- Land adjoining The Marsh Academy, Station Road, New Romney (Policy RM5);

7.5 Land at Varne Boat Club (RM10) and at Rhee Wall Road, Brenzett (part of RM14) are now within Flood Zone 1. The Varne Boat Club has been removed from this assessment as it is in a sequentially preferable location. The Rhee Wall Road site is one of two sites identified in Policy RM14 and has been retained for the assessment as the other site is within Flood Zone 3.

7.6 There are eleven alternative sites put forward for consideration outside Flood Zone 3. These are:

- **Site 1020: Land to the South of New Romney** for 22ha for 400 dwellings, medical hub, open space and relief road to Mountfield Road Industrial Estate. Large site covering Flood Zones 1 and 2 (this site is no longer within Flood Zone 3);
- **PO25 Land adjacent Josephs Way, New Romney.** 0.69ha for 12 dwellings. The site now falls within Flood Zone 1;

- **PO26 Cemex, Station Approach.** 1.5ha or 30 dwellings now within Flood Zone 1;
- **602 Land adjacent to Church Lane, New Romney.** 2.82ha for 56 dwellings. Site is now within flood zone 2;
- **Site 390: Peak Welders, Station Road, Lydd;** 0.7 ha or 14 dwellings. Majority of the site is Flood Zone 1, with a small part of the site to the north within Flood Zones 2 and 3;
- **Site 451b: Land to the Rear of the Ambulance Station, Kitewell Lane, Lydd.** 0.17 ha for 15 dwellings. Site is within Flood Zone 2 and 3;
- **Site PO23: Land at Harden Road, Lydd.** 1.01 ha for 20 dwellings. Flood Zone 1;
- **Site 620 & PO24: Land at Harden Road, Lydd.** 1ha (20 dwellings) or 1.61 ha (36 dwellings). Flood Zones 1;
- **Site 335 Fisher Field, Dengeness Road, Lydd.** 0.45ha for 9 dwellings. Now within Flood Zone 1;
- **Site 1016/PO30 Land north of Boamans Lane, Brookland.** 0.51ha for 10 dwellings. Now within flood Zone 1; and
- **Site 329 Pepperland Nurseries, Boarmans Lane, Brookland.** 1.71ha for 34 dwellings. Within Flood Zones 1, 2 and 3.

7.3 As Romney Marsh is restricted, other sites within Flood Zone 3 have also been considered using the flood hazard areas identified in the Shepway SFRA (year 2115), where these are sequentially preferable.

Land off Cherry Gardens, Littlestone (Policy RM1)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
The site is 0.6ha in size and is located on the edge of existing residential development. It is estimated that the site could come forward for 10 dwellings. Site within Flood Zone 2.	Site 390: Peak Welders, Romney Marsh, Lydd. The majority of the 0.7 ha site is located in Flood Zone 1 with a very small area within Flood Zone 3. It is the view of KCC Highways that this site is unsuitable for residential development due to the vehicular and pedestrian access.	There are no other similar sites that are sequentially preferable within the Romney Marsh area.
	The majority of the 0.79 ha site falls within Flood Site 451b: Kitewell Lane, Rear of Ambulance Station, Lydd. Zone 2 with a small area within Flood Zone 3. The site was considered unsuitable for development as the whole site falls within a designated Local Wildlife Site.	The site should be considered under the Exceptions Test.
	Site 1016/PO30 Land north of Boamans Lane, Brookland. 0.51ha for 10 dwellings. Now within flood Zone 1; Falls outside of the flood hazard areas identified in the SFRA. The site lies to the south of the Brookland bypass which is more open and reflects the rural nature of the historic part of the settlement. Development here would have a detrimental impact on this character and	

	lead to the conjoining the two distinct parts of the settlement. The land is suitable for open space in relation to the other allocated sites.	
	PO25 Land adjacent Josephs Way, New Romney. 0.69ha for 12 dwellings. The site now falls within Flood Zone 1; The site does not fall within the flood hazard areas in the SFRA. A suitable vehicular access cannot be established onto the site as it would require third party land.	

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared.

- 7.4 The site would provide homes to help meet the residential requirements for the Core Strategy.
- 7.5 The site has only scored significant negative effects in the SA on flood risk but with mitigation, this was reduced. The site scored positively or very positively on the following objectives:

SA Objectives
5. Improve the provision of homes, including affordable housing
6. Support the creation of high quality and diverse employment opportunities.
8(a). Landscape
10(a) Reduce the need to travel
10(b) Increase opportunities to choose sustainable transport modes
11(a) Efficient Use of Land
12. Maintain and improve the quality of groundwater, surface waters and coastal waters

- 7.6 The site was neutral or had a slight negative impact on the remaining objectives in the SA.
- 7.7 The site allocation has been informed by the Shepway SFRA. The site falls outside of any flood hazard.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

- 7.8 The SFRA indicates that the site would be safe for the lifetime of the development (2115) as it falls outside of flood hazard areas identified in the SFRA. Any planning application would need to be accompanied by a site specific flood risk assessment.

Land off Victoria Road West, Littlestone (RM2)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
<p>The site is 2.9ha in size and is located on the edge of existing residential development. It is estimated that the site could come forward for 70 dwellings. The site is mainly Flood Zone 2 with a small element of 3.</p>	<p>Site 607: Land adjacent to Church Lane New Romney. The 2.82ha site falls within Flood Zone 2 but does not fall within any flood hazard areas in the SFRA. Development here would result in the built form encroaching into the countryside.</p>	There are no other similar sites that are sequentially preferable within the Romney Marsh area.
	<p>Site 1021: Land to the North East of New Romney. The 6.82ha site is much larger than the land proposed at Victoria Road but a smaller area (of similar size) could be considered. The site falls within Flood Zone 3 but falls outside of the flood hazard areas in the SFRA.</p> <p>Development in this location would result in the built form encroaching into the countryside. If development was to the east of New Romney, there would be also be detrimental impact on the adjacent Local Nature Reserve and SSSI.</p>	The site should be considered under the Exceptions Test.
	<p>Site 373: Land west of Cockreed Lane, New Romney. 4.7ha site within Flood Zone 3 but within 'low' and 'moderate' flood hazard. This site lies north of land already allocated for development in the Core Strategy but which has not yet started. Development of this site would result in the built form encroaching into the countryside, which would also be divorced from the town if the Core Strategy sites had not been developed.</p>	
	<p>PO27: Dymchurch Recreational Ground, St Mary's Road, Dymchurch. The 4.5ha site is within Flood Zone 3 but falls within the 'moderate' flood hazard area in the SFRA. Development here was not considered suitable due to the loss of sports grounds.</p>	

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared.

- 7.9 The site would provide homes to help meet the residential requirements for the Core Strategy.
- 7.10 The site has only scored significant negative effects in the SA on flood risk but with mitigation, this was reduced. The site scored positively or very positively on the following objectives:

SA Objectives
3. Promote community vibrancy
5. Improve the provision of homes, including affordable housing
6. Support the creation of high quality and diverse employment opportunities.
8(a). Landscape
8(c). Townscape Regeneration
9. Conserve and Enhance biodiversity
10(a) Reduce the need to travel
10(b) Increase opportunities to choose sustainable transport modes
12. Maintain and improve the quality of groundwater, surface waters and coastal waters
14. Protect and enhance open space and ensure that it meets local needs

7.11 The site was neutral or had a slight negative impact on the remaining objectives in the SA.

7.12 The site allocation has been informed by the Shepway SFRA, as it falls within a range of flood hazard areas but approximately half falls within 'low' and 'moderate'. The northern part of the site falls outside of any flood hazard.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.13 The SFRA indicates that the site would be safe for the lifetime of the development (2115). The site has been subject to a site specific flood risk assessment which suggests that development would meet the second part of the Exceptions Test.

Land west of Ashford Road, New Romney (Policy RM4)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
The site is 3.22ha and is considered suitable for up to 60 dwellings. .	There are no sites of a similar size within Flood Zones 1 and 2.	There are no other similar sites that are sequentially preferable within the Romney Marsh area. The site should be considered under the Exceptions Test.

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared.

7.14 The site is adjacent to land that has been allocated in the Core Strategy for 200 dwellings, which has a recent planning permission. Development of this site would provide homes in Romney Marsh to meet the requirements in the Core Strategy.

7.15 The site has only scored significant negative effects in the SA on flood risk. The site scored positively or very positively on the following objectives:

SA Objectives
3. Promote community vibrancy
5. Improve the provision of homes, including affordable housing
6. Support the creation of high quality and diverse employment opportunities.
8(a). Landscape
9. Conserve and enhance biodiversity
10(a) Reduce the need to travel
10(b) Increase opportunities to choose sustainable transport modes
12. Maintain and improve the quality of groundwater, surface waters and coastal waters
14. Protect and enhance open space and ensure that it meets local needs.

7.16 The site was neutral or had a slight negative impact on the remaining objectives in the SA.

7.17 The site allocation has been informed by the Shepway SFRA as it falls outside of any flood hazard areas.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.18 The SFRA indicates that the site would be safe for the lifetime of the development (2115) as it falls outside any flood hazard areas.

7.19 Any planning application would be accompanied by a site specific flood risk assessment.

Marsh Academy, Station Road, New Romney (Policy RM5)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
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<p>The site is 0.98ha and considered suitable for safeguarding for a new medical hub and some residential development to support this scheme. Site is within Flood Zone 2.</p>	<p>Site 620: Land at Harden Road Lydd (Smaller area than PO24). The 1ha site falls within Flood Zones 1 and 2. The majority of the site also falls outside of the Flood Hazard areas in the SFRA. Only a small area is within the 'low' or 'moderate' flood hazard. The site is not considered suitable because third party land would be required to create a suitable vehicular access to the site.</p>	<p>There are no other similar sites that are sequentially preferable within the Romney Marsh area.</p> <p>The site should be considered under the Exceptions Test.</p>
	<p>PO23: Land at Harden Road, Lydd. The 1.01ha site is now located within Flood Zone 1. The majority of the site falls within the 'moderate' flood hazard area in the SFRA. The site currently consists of a grassed area and an industrial unit. The site is adjacent to other business and is considered unsuitable for residential development due to these neighbouring uses and loss of employment land.</p>	
	<p>Site 1017: Land south of Boarmans Lane, Brookland. Site is in Flood Zone 3 but is not within any flood hazard areas. The 9.2 ha site is not considered suitable as development would result in the urban form encroaching into the open countryside and it would have a detrimental impact on the setting of the conservation area and listed buildings.</p>	

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared.

7.20 Safeguarding of the site for a medical hub would bring much needed services to the Romney Marsh area. The location is also adjacent to other public facilities (local school and sports centre), which would could benefit each of the facilities. Residential development would only be permitted to support the delivery of these facilities.

7.21 The site has only scored significant negative effects in the SA on flood risk but with mitigation, this was reduced. The site scored positively or very positively on the following objectives:

SA Objectives
3. Promote community vibrancy
5. Improve the provision of homes, including affordable housing
6. Support the creation of high quality and diverse employment opportunities.
8(a). Landscape
8(c). Townscape Regeneration
10(a) Reduce the need to travel

10(b) Increase opportunities to choose sustainable transport modes
11(a) Efficient Use of Land
12. Maintain and improve the quality of groundwater, surface waters and coastal waters

7.22 The site was neutral or had a slight negative impact on the remaining objectives in the SA.

7.23 The safeguarding allocation has been informed by the SFRA; the site falls outside flood hazard areas.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.24 The SFRA indicates that the site would be safe for the lifetime of the development (2115) as it falls outside the flood hazard area. Any planning application would need to be accompanied by a site specific flood risk assessment.

Former Sands Motel, St Mary's Bay (Policy RM9)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
The site is 1.6ha in size and is allocated for 85 dwellings. The 2006 Local Plan allocation was granted planning permission in June 2016 for 85 dwelling, which have now started.	PO24: Land at Harden Road, Lydd. 1.61ha (36 dwellings) Flood Zone 2. The site would need third party land to ensure a suitable vehicle access. Therefore this site is not deliverable.	There are no other suitable alternative sites of similar size in lower flood risk areas.
	Site 607: Land adjacent to Church Lane, New Romney. 2.82ha. Larger site which falls within Flood Zone 3 but outside the Flood Hazard Maps. The site was considered unsuitable due to its location on the edge of New Romney, with any development encroaching into the countryside.	The site should be considered under the Exceptions Test.
	PO26 Cemex, Station Approach New Romney. 1.5ha & Flood Zone 1. The site falls outside of the flood hazard areas identified in the SFRA. Unsuitable site in terms of built form as it would create a separate 'island' of residential development adjacent to industrial uses or open countryside.	
	Site 329 Pepperland Nurseries, Boarmans Lane, Brookland. Within Flood Zones 1, 2 & 3. 1.72ha. Not within the SFRA Flood Hazard areas. The site is, however, remote in terms of access to local services; development of the site could have a detrimental impact on the	

	conservation area; and KCC Highways has raised concerns as there is no footway along Straight Lane.	
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Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared.

7.25 The site was a former motel and is therefore considered to be a previously developed site. Redevelopment of the site would make use of this as well as providing homes in the St Mary's Bay area.

7.26 The site has only scored negatively in the SA on flood risk and biodiversity but with mitigation in the policy the negative impacts were reduced. The site scored positively or very positively on the following objectives:

SA Objectives
3. Promote community vibrancy
5. Improve the provision of homes, including affordable housing
8(c) Townscape: regeneration
10(b) Increase opportunities to choose sustainable transport modes
11(a) Efficient use of land
14. Protect and enhance open space and ensure that it meets local needs.

7.27 The site was neutral on the remaining objectives in the SA.

7.28 The site allocation has been informed by the Shepway SFRA and a site specific flood risk assessment.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.29 A site specific flood risk assessment has been undertaken to accompany the planning application, which demonstrates that development would be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall, despite falling within a range of flood hazard areas in the SFRA.

Car Park, Coast Drive, Greatstone (Policy RM11)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
The site is 0.47ha and considered suitable for up to 16 dwellings. A planning application is currently being considered for residential development.	Site 390: Peak Welders, Romney Marsh, Lydd. The majority of the 0.7 ha site is located in Flood Zone 1 with a very small area within Flood Zone 3. It is the view of KCC Highways that this site is unsuitable for residential development due to the vehicular and pedestrian access.	There are no other similar sites that are sequentially preferable within the Romney Marsh area. The site should be considered under the Exceptions Test.
	Site 451b: Kitewell Lane, Rear of Ambulance Station, Lydd. The majority of the 0.79 ha site falls within Flood Zone 2 with a small area within Flood Zone 3. The site was considered unsuitable for development as the whole site falls within a designated Local Wildlife Site.	
	Site 435: Land north of Avonlea, Dymchurch Road, New Romney. 0.51 ha site within Flood Zone 3 but falls outside of the flood hazard areas. Not considered suitable due to its location in the open countryside.	
	Site 378: Land at Mulberry Cottage, Lydd. The 0.5ha site falls within Flood Zones 2 and 3 but the majority of the site falls outside the flood hazard areas (the rest is within 'low' or 'moderate'). The site does not, however, have or have the option for, a suitable highway access.	
	Site 335 Fisher Field, Dungeness Road Lydd. Flood Zone 1. 0.51ha. Within 'Significant', 'moderate' and 'low' Flood Hazard in the SFRA. It is also within a BOA	
	Site 1016/PO30 Land north of Boarmans Lane, Brookland. 0.5ha Flood Zone 1. Falls outside of the flood hazard areas identified in the SFRA. The site lies to the south of the Brookland bypass which is more open and reflects the rural nature of the historic part of the settlement. Development here would have a detrimental impact on this character and lead to the conjoining the two distinct parts of the settlement. The land is suitable for open space in relation to the other allocated sites.	

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared.

7.35 The site is currently used as a car park and is therefore considered to be a previously developed site. Redevelopment of the site would make use of this as well as providing homes in the Greatstone Area. Development would still retain public car parking.

7.36 The site has only scored negatively in the SA on flood risk and biodiversity but with mitigation in the policy the negative impacts were reduced. The site scored positively or very positively on the following objectives:

SA Objectives
5. Improve the provision of homes, including affordable housing
8(c) Townscape: regeneration
10(b) Increase opportunities to choose sustainable transport modes
11(a) Efficient use of land

7.37 The site was neutral on the remaining objectives in the SA.

7.38 The site allocation has been informed by the Shepway SFRA as it falls within the 'low' flood hazard area.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.39 The SFRA Phase II indicates that the site will be safe in 2115 as it falls within the 'low' hazard area. A site specific flood risk assessment has been undertaken to accompany the planning application.

The Old Slaughterhouse, 'Rosemary Corner', Brookland (RM12)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
The site is 0.27ha in size and is located on the edge of existing residential development. It is estimated that the site could come forward for 5 dwellings.	Site 390: Peak Welders, Romney Marsh, Lydd. The majority of the 0.7 ha site is located in Flood Zone 1 with a very small area within Flood Zone 3. It is the view of KCC Highways that this site is unsuitable for residential development due to the vehicular and pedestrian access.	There are no other similar sites that are sequentially preferable within the Romney Marsh area.
	Site 451b: Kitewell Lane, Rear of Ambulance Station, Lydd. The majority of the 0.79 ha site falls within Flood Zone 2 with a small area within Flood Zone 3. The site was considered unsuitable for development as the whole site falls within a designated Local Wildlife Site.	The site should be considered under the Exceptions Test.
	Site 435: Land north of Avonlea, Dymchurch Road, New Romney. 0.51 ha site within Flood Zone 3 but falls outside of the flood hazard areas. Not considered suitable due to its location and resulting encroachment into the open countryside.	

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared?

7.40 The site would provide homes to help meet the residential requirements for the Core Strategy in the central part of the Romney Marsh.

7.41 The site has only scored significant negative effects in the SA on flood risk, conserve and enhance heritage assets and soil quality. With mitigation, the impact on the heritage asset was reduced. The site scored positively or very positively on the following objectives:

SA Objectives
5. Improve the provision of homes, including affordable housing
8(c). Townscape Regeneration
9. Conserve and enhance biodiversity
10(b) Increase opportunities to choose sustainable transport modes
11(a) Efficient Use of Land

7.42 The site was neutral on the remaining objectives in the SA.

7.43 The site allocation has been informed by the Shepway SFRA. The site does not fall within any flood hazard areas.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.44 The SFRA Phase II indicated that the site would be safe for residential development for its lifetime (2115) as it falls outside any flood hazard areas. Any planning application would also need to be accompanied by a site specific flood risk assessment.

Land north Pod Corner, Brookland (RM13)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
The site is 0.72ha and considered suitable for up to 15 dwellings.	Site 390: Peak Welders, Romney Marsh, Lydd. The majority of the 0.7ha site is located in Flood Zone 1 with a very small area within Flood Zone 3. It is the view of KCC Highways that this site is unsuitable for residential development due to the vehicular and pedestrian access.	There are no other similar sites that are sequentially preferable within the Romney Marsh area.

	Site 451b: Kitewell Lane, Rear of Ambulance Station, Lydd. The majority of the 0.79ha site falls within Flood Zone 2 with a small area within Flood Zone 3. The site was considered unsuitable for development as the whole site falls within a designated Local Wildlife Site.	The site should be considered under the Exceptions Test.
	PO25 Land adjacent Josephs Way, New Romney. 0.69ha for 12 dwellings. The site now falls within Flood Zone 1; The site does not fall within the flood hazard areas in the SFRA. A suitable vehicular access cannot be established onto the site as it would require third party land.	

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared.

7.45 The site would provide homes to help meet the residential requirements for the Core Strategy in the central part of the Romney Marsh.

7.46 The site has only scored significant negative effects in the SA on flood risk and soil quality. The policy requirements, however, will help to reduce the flood risk problem. The site scored positively or very positively on the following objectives:

SA Objectives
3. Promote community vibrancy
5. Improve the provision of homes, including affordable housing
8(a). Landscape
9. Conserve and enhance biodiversity
10(b) Increase opportunities to choose sustainable transport modes
11(a) Efficient Use of Land
12. Maintain and improve the quality of groundwater, surface waters and coastal waters
14. Protect and enhance open space and ensure that it meets local needs

7.47 The site was neutral or had a slight negative impact on the remaining objectives in the SA.

7.48 The site allocation has been informed by the SFRA; the site falls outside flood hazard areas.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.49 The SFRA Phase II indicated that the site would be safe for residential development for its lifetime (2115) as it falls outside any flood hazard areas for 2115. Any planning application would also need to be accompanied by a site specific flood risk assessment.

Land adjacent either side of Framlea, Pod Corner, Brookland (Policy RM13)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
Two sites either side of the property Framlea, the larger site being 0.63ha, the smaller being 0.15ha. The site in total is considered suitable for approximately 14 dwellings. Flood Zones 2 and 3	Site 390: Peak Welders, Romney Marsh, Lydd. The majority of the 0.7ha site is located in Flood Zone 1 with a very small area within Flood Zone 3. It is the view of KCC Highways that this site is unsuitable for residential development due to the vehicular and pedestrian access.	There are no other similar sites that are sequentially preferable within the Romney Marsh area. The site should be considered under the Exceptions Test.
	Site 451b: Kitewell Lane, Rear of Ambulance Station, Lydd. The majority of the 0.79ha site falls within Flood Zone 2 with a small area within Flood Zone 3. The site was considered unsuitable for development as the whole site falls within a designated Local Wildlife Site.	
	PO25 Land adjacent Josephs Way, New Romney. 0.69ha for 12 dwellings. The site now falls within Flood Zone 1; The site does not fall within the flood hazard areas in the SFRA. A suitable vehicular access cannot be established onto the site as it would require third party land.	

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared?

7.50 The site would provide homes to help meet the residential requirements for the Core Strategy in the central part of the Romney Marsh.

7.51 The site has only scored significant negative effects in the SA on flood risk and soil quality. The policy, however, will help to reduce the flood risk problem. The site scored positively or very positively on the following objectives:

SA Objectives
3. Promote community vibrancy
5. Improve the provision of homes, including affordable housing
8(a). Landscape
9. Conserve and enhance biodiversity
10(b) Increase opportunities to choose sustainable transport modes

11(a) Efficient Use of Land
12. Maintain and improve the quality of groundwater, surface waters and coastal waters
14. Protect and enhance open space and ensure that it meets local needs

7.52 The site was neutral or had a slight negative impact on the remaining objectives in the SA.

7.53 The site allocation has been informed by the SFRA; the site falls outside flood hazard areas.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.54 The SFRA Phase II indicated that the site would be safe for residential development for its lifetime, as it falls outside any flood hazard areas for 2115. Any planning application would also need to be accompanied by a site specific flood risk assessment.

Land adjacent Moore Close, Brenzett and Land at Rhee Wall Road, Brenzett (Policy RM14)

Sequential Test

Site Description	Comparable Alternative Sites Considered	Conclusion
The sites are 2.36ha in size and are located on the edge of existing residential development. It is estimated that the site could come forward for 26 dwellings if developed separately or 40 together.	Site 607: Land adjacent to Church Lane New Romney. The 2.82ha site falls within Flood Zone 2 but does not fall within any flood hazard areas in the SFRA. Development here would result in the built form encroaching into the countryside.	There are no other similar sites that are sequentially preferable within the Romney Marsh area. The site should be considered under the Exceptions Test.

Exceptions Test

1. Development provides wider sustainability benefits to the community that outweigh flood risk, informed by the SFRA where one has been prepared.

7.55 The site would provide homes to help meet the residential requirements for the Core Strategy in the central part of the Romney Marsh.

7.56 The site has only scored significant negative effects in the SA on flood risk and soil quality. The policy requirements, however, will help to reduce the flood risk issue. The site scored positively or very positively on the following objectives:

SA Objectives
3. Promote community vibrancy
5. Improve the provision of homes, including affordable housing
9. Conserve and enhance biodiversity
10(b) Increase opportunities to choose sustainable transport modes
12. Maintain and improve the quality of groundwater, surface waters and coastal waters

7.57 The site was neutral or had a slight negative impact on the remaining objectives in the SA.

7.58 The site allocation has been informed by the SFRA; the site falls outside of flood hazard areas.

2. Development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

7.59 The SFRA Phase II indicated that the site would be safe for residential development for its lifetime, as it falls outside any flood hazard areas for 2115. Any planning application would need to be accompanied by a site specific flood risk assessment.

Site Analysis for Sequential Test

Urban Character Area

Allocated Sites in the Urban Character Area in Flood Zone 1

Ward	SHLAA Ref	Policy Number	Address	Flood Zone	Comments	Area (Estimated No. of dwellings).
Broadmead	656	RL11	Silver Spring, Park Farm	Flood Zone 1	Employment site	(0)
East Folkestone	27B	UA6	Shepway Close, Folkestone	Flood Zone 1		0.79ha (35)
	346	UA7	Former Gas Works, Ship Street, Folkestone	Flood Zone 1	Small part of the site is within Flood Zone 2	1.5ha (100)
Folkestone Central	46	UA5	Ingles Manor, Castle Hill Avenue, Folkestone	Flood Zone 1	Mixed use development consisting of residential and employment	1.9ha (46)
	625	UA4	3-5 Shorncliffe Road, Folkestone	Flood Zone 1		0.15ha (20)
Folkestone Cheriton	637	UA9	Brockman Family Centre	Flood Zone 1		0.87ha (26)
	687	UA10	The Cherry Pickers, Cheriton	Flood Zone 1		0.23ha (10)
	425C	UA11	Affinity Water, Land at Cherry Garden Avenue, Folkestone	Flood Zone 1	Very small part of site (along the boundary) is in Flood Zone 3 due to stream running along southern boundary. Mixed-use residential, employment and open space.	2.87ha (70)
Folkestone Harbour	45	UA2	Marine Parade Car Park, Folkestone	Flood Zone 1		0.7ha (65)
	342	UA2	Rotunda Car Park, Lower Sandgate Road, Folkestone	Flood Zone 1		0.5ha (50)

Ward	SHLAA Ref	Policy Number	Address	Flood Zone	Comments	Area (Estimated No. of dwellings).
	382	UA1	East Station Goods Yard, Southern Way, Folkestone	Flood Zone 1		1.25ha (40)
Folkestone Park	458	UA8	Highview School, Moat Farm Road, Folkestone	Flood Zone 1		0.9ha (27)
Broadmead	103	UA3	The Royal Victoria Hospital, Radnor Park Avenue	Flood Zone 1	Northern boundary runs along stream with a small element of Flood Zone 3.	1ha (42)
Sandgate and West Folkestone	113	UA12	Former Encombe House, Sandgate	Flood Zone 1		1.65ha (36)
Hythe	621	UA14	Land opposite 24 Station Road, Hythe	Flood Zone 1	Small part of the site (along part of the western boundary) is within Flood Zone 3)	1.25ha (30)
	153	UA18	Princes Parade, Hythe	Flood Zone 1	Former refuse tip is outside of Flood Hazard areas in the SFRA. Mixed-use development including new public pool and open spaces, residential, retail, and hotel.	7.2ha (150)
	313	UA17	Foxwood School, Seabrook Road, Hythe	Flood Zone 1		6.3ha (150)
	1018	UA16	St Saviour's Hospital, Seabrook Road, Hythe	Flood Zone 1		1.14ha (50)
	622	UA15	Saltwood Care Centre, Tanners Hill, Hythe	Flood Zone 1	For C2 or C3 Extra Care units. Small part of the site (along eastern boundary) is within Flood Zone 3.	2.1ha (84)

Allocated Sites in the Urban Area Character Area within Flood Zone 2 and 3

Ward	SHLAA Ref	Policy Number	Address	Flood Zone	Comments	Area (Estimated No. of Dwellings)
Hythe	137	UA13	Smiths Medical Campus, Boundary Road, Hythe	Flood Zone 1, 2 and 3.	Previously developed site falling within all Flood Zones. Northern half of the site is within significant flood hazard in the SFRA. Southern half not within flood hazard. Mixed use of residential and employment.	3.2ha (80)
	142	UA19	Hythe Swimming Pool	Flood Zone 3	Outside of Flood Hazard Mapping	0.5ha (50)

Alternative Sites Considered in the Urban Area

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of Dwellings)
East Folkestone	688	Upper Works Site, Castle Hill	Flood Zone 1	Divorced from Folkestone in an unsustainable location for residential development. The site is also within the AONB; there is an Ancient Monument within the site and adjacent to the site; there are	5ha (50)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of Dwellings)
				SSSI and SAC designations; and it is also a Latchgate area.	
Folkestone Park	338	Black Bull Road Allotments, Dolphins Road, Folkestone	Flood Zone 1	Not allocated because of the loss of allotment gardens	1.6ha (65)
Folkestone Cheriton	602	Land between Valebrook Close and Valestone Close, Folkestone	Flood Zone 1	Not allocated.	
Sandgate and West Folkestone	405	Coolinge Lane Land, Sandgate	Flood Zone 1	Not taken forward at this stage due to loss of sports ground and objections from Sport England.	2.7ha (54)
	674	Digby Road, Folkestone	Flood Zone 1	Not allocated due to loss of local parking and townscape issues.	0.17ha (9)
	608	West Grove, Wellington Place, Sandgate	Flood Zone 1	Site too small to allocate (less than five dwellings).	-
Hythe	158	Vale Farm (The Piggeries) Horn Street, Folkestone	Flood Zone 1	Not taken forward due to highways and detrimental impact on local landscape designation. Very small area within Flood Zone 2.	4.6ha or 1.3ha (26)
	155	Rectory Field, Eversley Way, Seabrook, Hythe	Flood Zone 1	Not taken forward due to loss of playing pitch and objections from Sport England.	1.75ha (50)
	615	Land north west of Blackhouse Hill, Hythe	Flood Zone 1	Not allocated due to unsustainable location within the AONB.	17.6ha (352)
	640	Adjacent 43 Horn Street, Folkestone	Flood Zone 1	Not allocated due to detrimental impact on local landscape designation and highway concerns.	1.2ha (24)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of Dwellings)
	603	Land off Spanton Crescent, Hythe	Flood Zone 1	Site is too small to allocate (less than five dwellings).	-
	444	Land north west of Rectory Lane, Saltwood	Flood Zone 1	The site is considered unsuitable as it is divorced from the main settlement in the open countryside in the AONB. In addition the site has poor road access.	1ha (20)
	630	Land adjacent 10 Spring Lane, Seabrook, Hythe	Flood Zone 1	The site falls within an Ancient Woodland and a Local Wildlife Site.	0.49ha (10)
	463	Hotel Imperial Golf Course land, Hythe	Flood Zone 3	The majority of the site falls outside of the flood Hazard in the SFRA. There is 'significant' flood hazard along the southern boundary (frontage along Princes Parade). Within this area there is a small area of 'extreme' hazard flooding. The land is considered to be important for the setting of the scheduled monument and for accessible open space with its unique open space features (location, setting and scale).	16.8ha (336)
Hythe Rural	632	Elms Farm, Ashford Road, Newingreen	Flood Zone 1	Not allocated in the PPLP due to intensification of development and urbanisation of the countryside. Newingreen is not a recognised settlement in the Core Strategy Settlement Hierarchy, and offers no services.	1.19ha (23)
	326	Land Adjacent The Willows, Ashford Road, Newingreen	Flood Zone 1	Not allocated in the PPLP due to intensification of development and urbanisation of the countryside. Newingreen is not a recognised settlement in the Core	3ha (60)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of Dwellings)
				Strategy Settlement Hierarchy, and offers no services.	
	690	Red House Farm, Newingreen	Flood Zone 1	Not allocated in the PPLP due to intensification of development and urbanisation of the countryside. Newingreen is not a recognised settlement in the Core Strategy Settlement Hierarchy, and offers no services.	2ha (40)
	457	Land opposite Rock Cottage, Botolphs Bridge Road	Flood Zone 3	The majority of the site is not within the flood hazard area identified in the SFRA. Only the eastern and north western parts of the site fall within 'significant' and the eastern boundary is in the 'extreme'. The site is, however, surrounded by 'extreme' and 'significant' flood hazard areas. The site is isolated and is not in a sustainable location.	0.63ha (12)
	624	Bluewater Caravan Site, Dymchurch Road, Hythe	Flood Zone 3	Within 'extreme' flood hazard in the SFRA.	1.3ha (26)
	626C	Land at Lyell Close (s), Hythe	Flood Zone 3	Within 'significant' flood hazard. Site is also too small to allocate (less than five dwellings).	-
	601	Land to the west 'Sunnyside' Burmarsh Road, Hythe West	Flood Zone 3	Within 'extreme' flood hazard in the SFRA	11.7ha (234)
	175	Land south west of Nickolls Quarry, Hythe	Flood Zone 3	Within 'extreme' and 'significant' flood hazard in the SFRA.	14.66ha (293)

North Downs Character Area

Allocated Sites in the North Downs Character Area Outside Flood Zones 2 and 3

Ward	SHLAA Ref	Policy number	Address	Flood Zone	Comments	Area (Estimated No. of Dwellings)
North Downs East	635	ND7	Camping and Caravan Site, Minnis Lane, Stelling Minnis	Flood Zone 1		0.47ha (11)
	1003	ND8	Land adjoining 385 Canterbury Road, Densole	Flood Zone 1	Residential (1.5ha) and allotments.	1.5ha (25)
	244	ND1	Former Officers' Mess, Aerodrome Road, Hawkinge	Flood Zone 1		3.75ha (70)
	334	ND2	Mill Lane rear of Mill Farm, Hawkinge	Flood Zone 1		1.1ha (14)
	404	ND3	Land adjacent Kent Battle of Britain Museum, Aerodrome Road, Hawkinge	Flood Zone 1		5.5ha (100)
Hythe Rural	209	ND6	Former Lympne Airfield, Lympne	Flood Zone 1		7ha (125)
North Downs West	605	ND4	Land east of Broad Street, Lyminge	Flood Zone 1		2.1ha (30)
	618	ND5	Land west of Jubilee Cottage, Swan Lane, Sellindge	Flood Zone 1		1.9ha (15)
	402	ND5	The Piggeries, Main Road, Sellindge	Flood Zone 1		0.3ha (5)
	1005	ND5	Land at Barrow Hill, Sellindge	Flood Zone 1		0.69ha (15)

Ward	SHLAA Ref	Policy number	Address	Flood Zone	Comments	Area (Estimated No. of Dwellings)
	1007	ND5	Silver Spray, Sellindge	Flood Zone 1		0.45ha (5)
	418	ND9	Etchinghill Nursery, Etchinghill	Flood Zone 1		1.6ha (30)
	419	ND10	Land adjacent to the Golf Course, Etchinghill	Flood Zone 1		0.74ha (11)

No sites within Flood Zones 2 and 3 are allocated in the North Downs Character Area

Alternative Sites Considered in the North Downs Character Area

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
North Downs East	1004	Land at Duck Street, Elham	Flood Zone 1	Not proceeded with due to Kent Highway objections and townscape issues	0.3ha (5)
	388	Land west of Canterbury Road, Hawkinge	Flood Zone 1	Not allocated as a suitable vehicle access could not be established.	1ha (20)
	303A	Land south of Little Densole Farm, Densole	Flood Zone 1	Not allocated due to highway concerns and detrimental impact on the AONB	2.2ha (50)
	617	Black Horse Caravan Site, Canterbury Road, Densole	Flood Zone 1	Not allocated due detrimental impact on the AONB.	3.66ha (70)
	1001	Land at Canterbury Road, Hawkinge	Flood Zone 1	Not allocated as it would be in the open countryside (AONB).	4.5ha (90)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
	261	Limuru, Cowgate Lane	Flood Zone 1	Located on the edge of Hawkinge some way from local services, with poor access. Site is also in the AONB.	0.9ha (18)
	316	East Hawkinge Lands, Hawkinge	Flood Zone 1	Development at this location would result in the built form encroaching into the countryside and have a detrimental impact on the AONB.	11.1ha (222)
	PO3	East Hawkinge Lands (revised area)	Flood Zone 1	Although reduced in size, development would still encroach into the countryside, which is AONB. There are far more suitable sites within the existing settlement boundary.	2.5 (50)
	616	Land north east of Hawkinge Cemetery, Hawkinge	Flood Zone 1	Not allocated as the site is divorced from Hawkinge and development would have a detrimental impact on the AONB.	5.1ha (102)
	399	Adjacent to 252 Canterbury Road, Hawkinge	Flood Zone 1	Not allocated as the site is divorced from Hawkinge and development would have a detrimental impact on the AONB.	1.83ha (36)
	634	Mill House, Oak Hill, Swingfield, Swingfield	Flood Zone 1	Not allocated as the site is in a remote location with no local services. The site is not in a sustainable location and any development here would be contrary Core Strategy Policies and the NPPF.	1ha (20)
North Downs West	204A/B	Folkestone Racecourse (parts), Westenhanger	Flood Zone 1	The site was originally allocated but the site was withdrawn to be considered as part of the Core Strategy Review.	0.75ha (10)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
	328	Sellindge East, Sellindge	Flood Zone 1	Not allocated due to existing proposed development at Sellindge in Core Strategy.	19ha (380)
	610	Grove House land, Main Road, Sellindge	Flood Zone 1	Not allocated due to existing proposed development at Sellindge in Core Strategy.	2.4ha (48)
	627	Land rear of Brook Lane Cottages, Brook Lane, Sellindge	Flood Zone 1	Not allocated due to highway concerns.	0.45ha (10)
	PO1a	Land to the west of Sellindge, Ashford Road	Flood Zone 1	Site would result in infilling of open land leading to further ribbon development in the open countryside. Core Strategy policy focuses on creating a new centre and this would not assist in that objective as it is on the opposite side of the village.	0.52ha (10)
	PO1b	Land to the west of Sellindge, Ashford Road	Flood Zone 1	Larger area including PO1a, the site is in open countryside and some distance from the main built form of the village. Contrary to Core Strategy policy for Sellindge.	3.16 (60)
	613	Land rear Barnstormers, Stone Street, Stanford	Flood Zone 1	Not allocated due to no access and detrimental impact on the setting of a Listed Building.	0.5ha (5)
	PO8	Land rear of Torchwood, Stanford	Flood Zone 1	Development of the site would result in 'backland' development that would be against the grain of the current built form and would encroach into the countryside.	0.96ha (18)
	423B	Land east of former railway, Teddars Leas Road, Etchinghill	Flood Zone 1	Was not allocated due to setting of the settlement within AONB. Development encroachment on the eastern side and would be against the grain of the village.	2ha (40)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
	428A	Land at Somerfield Court Farm, Barrowhill (Northern), Sellindge	Majority of the site is Flood Zone 1	A small part of the site is crossed by a stream which has resulted in a small area Flood Zone 3. The site was not allocated in the PPLP as it was backland development and encroachment into the countryside. More appropriate land has been allocated in the Core Strategy for residential development.	1.86ha (50)
	428B	Land at Somerfield Court Farm, Barrowhill (Southern), Sellindge	Flood Zone 1	The site was not allocated in the PPLP as it was backland development and encroachment into the countryside. More appropriate land has been allocated in the Core Strategy for residential development.	2ha (40)
	606	The Mount, Barrow Hill, Sellindge	Flood Zone 1	There is an upstanding Bronze Age burial mound recorded on site and development would not be appropriate.	2.3ha (50)
	628	Rhodes House, Main Road, Sellindge	Flood Zone 1	Any development would have a detrimental impact on the setting of a Grade II listed building.	1.1ha (22)
	619	Land west of Trust Cottages, Moorstock Lane, Sellindge	Flood Zone 1	The site is located some distance away from the main settlement and is, therefore, considered to be an unsustainable location.	0.7ha (14)
	1006	Otterpool Quarry, Sellindge	Flood Zone 1	The site is in an unsustainable location as it is not near any local facilities. It is also adjacent to a SSSI.	3.5ha (70)
	633	Hilltop Farm, Woodland Road, Lyminge	Flood Zone 1	The site is located some distance away from Lyminge in the open countryside in the	0.67ha (13)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
				AONB. The site is not in a sustainable location.	
	PO4	Land south west of Canterbury Road, Lyminge	Flood Zone 1	Development of this site would result urban form that would not be a natural extension of the village and would result in encroachment into the countryside (AONB). The site would not provide any additional benefit to residents.	(50)
	691	Land adjoining Lyndon Hall, Lyminge	Flood Zone 1	Not allocated due to the detrimental impact on a Grade II listed building, the site is covered by TPOs and is on the edge of the village in the AONB.	2ha (40)
	PO5	Site at Red House Lane, Lyminge	Flood zone 1	Development would result in the urban form encroaching into the countryside, which is AONB.	0.63ha (8-10)
	327	Land off Teddars Leas Road, Etchinghill	Flood Zone 1	The site was not allocated as development here would be an inappropriate extension and encroach into the countryside, which is AONB. Highways would also need to be improved.	1.13ha (22)
	423A	Land east of former railway, Teddars Leas Road, Etchinghill	Flood Zone 1	The site was not allocated as development here would be an inappropriate extension and encroach into the countryside, which is AONB. Highway would also need to be improved.	2ha (40)
	614	Land at Newingreen Estate, Stone Street, Stanford	Flood Zone 1	The site was not allocated as it is located some distance away from the main	4.4ha (88)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
				settlement and is, therefore, considered to be an unsustainable location.	
	1008	Land at Great Priory Woods	Flood Zone 1	The site is divorced from the main settlement, half the site is an ancient woodland and would encroach into the countryside. Residential development has also already been identified in the Core Strategy for Sellindge.	1.9ha (38)

Romney Marsh

Allocated Sites in the Romney Marsh Character Area in Flood Zone 1

Ward	SHLAA Ref	Policy Number	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
Walland & Dengemarsh	195	RM8	Station Yard, Station Road, Lydd	Flood Zone 1		0.85ha (30)
	306A	RM7	Land South of Kitewell Lane, Lydd	Flood Zone 1		0.51ha (9)
	306B	RM6	Kitewell Lane, rear of Ambulance Station, Lydd	Flood Zone 1		0.39ha (8)
Romney Marsh	230/436	RM3	Land rear of Romney	Flood Zone 1		0.4ha (10)
	462	RM10	Land rear Varne Boat Club, Coast Drive, Greatstone	Flood Zone 1	SFRA not within Flood Hazard. Site now has planning permission for residential development.	0.23ha (5)
	PO18	RM14	Land at Rhee Wall Raod, Brenzett	Flood Zone 1	Not within any Flood Hazard areas in the SFRA and the site could assist with additional access to site ref 612 or as smaller development site.	0.29 (5)

Allocated Sites in the Romney Marsh Character Area within Flood Zones 2 and 3

Ward	SHLAA Ref	Policy Number	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
Dymchurch	004	RM9	Former Sands Motel, St Mary's Bay	Flood Zone 3	Former 2006 allocation now with planning permission.	1.6ha (85)
	1013	RM11	Car Park, Coast Drive, Greatstone	Flood Zone 3	SFRA within 'low' Flood Hazard	0.47ha (16)
	403	RM4	Land west of Ashford Road, New Romney	Flood Zone 3	Small area to the south in Flood zone 1, Not within Flood Hazard in SFRA	3.22ha (60)
	638	RM5	Marsh Academy, Station Road, New Romney	Flood Zone 2	For medical hub and some residential. Not within Flood Hazard in the SFRA.	Mixed use
	379	RM2	Land off Victoria Road West, Littlestone	Flood Zone 2	Only a small area within Flood Zone 3. Site is on the edge of the flood mapping with parts within 'low', 'moderate' or no Flood Hazard areas in the SFRA. Additional site specific FRA has been carried out.	2.9ha (70)
	PO20	RM1	Land off Cherry Gardens, Littlestone	Flood Zone 2	The site is outside of the Flood Hazard areas in the SFRA. The site would be well integrated into the existing built form.	0.6ha (10)
Walland & Dengemarsh	431	RM12	The Old Slaughterhouse 'Rosemary Corner', Brookland	Flood Zone 3	The site is not within the SFRA Flood Hazard	0.27ha (5)
	407A	RM13	Land at Pod Corner, Brookland	Flood Zone 2 & 3	Not within the SFRA Flood Hazard areas. The site is located adjacent to existing residential development and is located closer to the local facilities.	0.72ha (15)
	609	RM13	Land adjacent Framlea, Rye Road, Pod Corner, Brookland	Flood Zone 2 & 3	Falls outside of the Flood Hazard areas identified in the SFRA. Site has few other	0.63ha (10)

Ward	SHLAA Ref	Policy Number	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
					constraints as it is well related to the existing modern built form on the north side of the Brookland Bypass	
	PO19	RM13	Land adjacent to Framlea, Brookland	Flood Zone 3	Falls outside of Flood Hazard areas in the SFRA. Although site is smaller than the threshold, it could be incorporated into neighbouring allocations.	0.15ha (5)
	612	RM14	Land adjacent Moore Close, Brenzett	Flood Zone 3	Not within the SFRA Flood Hazard areas. The site is located adjacent to existing residential development and is located close to the local facilities.	2.07ha (20)

Alternative Sites Considered in the Romney Marsh Character Area

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
Romney Marsh	1020	New Romney Southern Extension	Flood . Zones 1 (small area Flood Zone 2)	SFRA indicates that there are areas within 'Low' and 'Moderate' Flood Hazard. Site not proceeded with due to land ownership issues.	22ha (400 + mixed use)
	373	Land west of Cockreed Lane, New Romney	Flood Zone 3	The majority of the site falls within 'low' and 'moderate' flood hazard in the SFRA. A small area also falls within 'significant'. The site is located beyond the Core Strategy broad locations for residential development. These should be developed in the first instance. Development in this location would also result in the built form encroaching significantly into the countryside.	4.7ha (100)
	1014	Craythorne Farm	Flood Zone 2 & 3	Was also not allocated due to the size (small), inappropriate development (allocated sites should be developed first) and encroaching into the countryside	-
	1015	Brickyard Poultry Farm, New Romney	Flood Zone 3	The site falls within 'moderate' flood hazard. The site is located beyond the Core Strategy broad locations for residential development. These should be developed in the first instance. Development in this location would also result in the built form encroaching significantly into the countryside.	1.4ha (28)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
	PO25	Land adjacent to Joseph's Way, New Romney.	Flood Zone 1	The site does not fall within the flood hazard areas in the SFRA. A suitable vehicular access cannot be established onto the site as it would require third party land.	0.69ha (12)
	347	Land west of High Knocke, Dymchurch	Flood Zone 3	The SFRA includes the site in the 'moderate' and 'significant' flood hazard. The site provides a distinct open gap between two settlements.	8.75ha (175)
	349	Land rear of Crimond Avenue 'Redoubt and Fleet Hythe', Dymchurch North	Flood Zone 3	The SFRA includes the site in the 'extreme' and 'significant' flood hazard. Development of the site would also result in encroachment of the built form into the countryside.	11.11ha (222)
	350A	Pear Tree lane Land, Dymchurch	Flood Zone 3	The site falls within the 'significant' flood hazard in the SFRA and development would have a detrimental impact on the adjacent Grade II listed building.	1ha (20)
	350B	Pear Tree lane Land, Dymchurch	Flood Zone 3	The site falls within the 'significant' and 'extreme' flood hazard in the SFRA.	3.98ha (79)
	351A	Land at Hythe Road, Dymchurch	Flood Zone 3	The site falls within the 'significant' and 'extreme' flood hazard in the SFRA. The site has poor vehicular access and is designated as a local wildlife site.	2.48 (49)
	351B	Land at Hythe Road, Dymchurch	Flood Zone 3	The site falls within the 'significant' and 'extreme' flood hazard in the SFRA. The site has poor vehicular access and is designated as a local wildlife site.	3.40 (67)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
	PO21	Land behind village hall car park	Flood Zone 3	The site falls within the 'significant' flood hazard in the SFRA.	0.44 (8)
	PO27	Dymchurch Recreational Ground, St Mary's Road, Dymchurch	Flood Zone 3	Site falls mainly within the 'moderate' flood hazard area in the SFRA. Small area within 'low'. Loss of sports pitch would be contrary to NPPF paragraph 74.	4.5 (13)
	352	Land north east of Nesbit Road 'Jesson Farmland', St Mary's Bay	Flood Zone 3	Falls within the 'significant', 'moderate' and 'low'. No suitable vehicle access can be created to the site.	0.9ha (18)
	380	Land off Jenners way, St Mary's Bay	Flood Zone 3	Falls within the 'moderate' and 'significant' flood hazard in the SFRA. Development of the whole site would result in development encroaching into the countryside.	1.3ha (26)
	604	Land east of Eastbridge Road, Dymchurch	Flood Zone 3	The site falls within 'significant' flood hazard in the SFRA. Development of the site would result in the built form encroaching into the countryside and the wider road network is not suitable for the amount of development.	4.36ha (87)
	391	The Old Rectory, Burmarsh	Flood Zone 3	The site falls within 'significant' flood hazard in the SFRA. Site is limited by TPOs and access and is therefore unsuitable for allocation.	1ha (20)
	611	Former piggery, Brooker Farm, Newchurch	Flood Zone 3	The site falls within the 'moderate' and 'low' flood hazard in the SFRA. Site is not in a sustainable location as it is in the countryside away from any local services.	1ha (20)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
	600	Land West of Burmarsh, Burmarsh	Flood Zone 3	The site falls within 'significant' flood hazard in the SFRA. Site is considered unsuitable given that development would notably extend the built area of the village into open countryside and would necessitate the upgrading of the main road through the village.	1.01ha (20)
	1009	Land North of Littlestone Golf Course (Site 1), Littlestone	Flood Zone 3	Falls outside of the flood hazard areas identified in the SFRA. The whole site falls within a SSSI.	2ha (40)
	1010	Land at Coast Road (Site 2), Littlestone	Flood Zone 3	Small area along western boundary outside Flood Zone 3. Falls within 'moderate' flood hazard area identified in the SFRA. The site is too small to be allocated and it falls within a SSSI.	-
	1011	Land at Coast Road (Site 3), Littlestone	Flood Zone 3	Small area along western boundary outside Flood Zone 3. Falls within 'moderate' flood hazard area identified in the SFRA. The site falls within a SSSI.	0.33ha
	1012	Land at St Andrews Road (Site 4), Littlestone	Flood Zone 3	Falls outside of the flood hazard areas identified in the SFRA. The site did not meet size threshold for allocation.	-
	PO28	Land at St Andrew's Road, Littlestone	Flood Zone 3	Falls outside flood hazard areas identified in the SFRA. The site is not in a sustainable location and is directly adjacent to a SSSI and Ramsar site. Loss of sports land also counts against the allocation of this site.	3.4ha (21)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
	PO26	Cemex, Station Approach	Flood Zone 1	The site falls outside of the flood hazard areas identified in the SFRA. Unsuitable site in terms of built form as it would create a separate 'island' of residential development adjacent to industrial uses or open countryside.	1.5ha (30)
	435	Land north of Avonlea, Dymchurch Road, New Romney	Flood Zone 3	Small area (along western boundary) within Flood Zone 1. Falls outside of the flood hazard areas identified in the SFRA. The site is set within open countryside on three sides and lead to further development beyond the boundary provided by Dymchurch Road.	0.51ha (10)
	607	Land adjacent to Church Lane, New Romney	Flood Zone 2	Small area within Flood Zone 3. Falls outside of the flood hazard areas identified in the SFRA. Development here would result in the built form encroaching into the countryside.	2.82ha (56)
	1021	Land North East of New Romney	Flood Zone 3	<p>The majority of the site falls outside of the flood hazard areas identified in the SFRA. Only the northern point falls within the 'low' flood hazard area.</p> <p>Large site that, if developed, would have detrimental impacts on the countryside, townscape character and on the adjacent SSSI and local nature reserve.</p>	6.82ha (136)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
Walland & Dengemarsh	390	Peak Welders, Romney Marsh, Lydd	Flood Zone 1 with western tip within Flood Zone 3.	Not allocated due to Kent Highway objection & safety issues	0.7ha (14)
	620	Land at Harden Road, Lydd	Flood Zone 1	Within some 'Low' to 'Moderate' Flood Hazard in the SFRA. Third party land would, however, be needed to create a suitable vehicular access.	1ha (20)
	335	Fisher Field, Dengeness Road, Lydd	Flood Zone 1	Within 'Significant', 'moderate' and 'low' Flood Hazard in the SFRA. It is also within a BOA	0.45ha (9)
	378	Land at Mulberry Cottage, Lydd	The majority of the site is within Flood Zone 3.	The majority of the site is outside of the flood hazard as identified in the SFRA, with only part of the site in 'low' or 'moderate' risk. The site, however, does not have a suitable vehicle access. It is also adjacent to a listed building and SSSI.	0.5ha (10)
	451b	Kitewell Lane, RO Ambulance Station, Lydd	Flood Zone 2 and 3	The majority of the site falls outside of the flood hazard in the SFRA, with only a small area within 'low' or 'moderate' risk. The whole site is, however, designated as a Local Wildlife site.	0.79ha (15)
	662	Land north of Sycamore Close, Lydd	Flood Zone 3	Falls within 'significant' flood hazard in the SFRA. The site is also SSSI and a local wildlife site.	2.15ha (43)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
	PO23	Land at Harden Road, Lydd	Flood Zone 1	The site falls within the 'moderate' flood hazard area. This is protected employment land and is adjacent to further employment land. Redevelopment of this site to residential could have compatibility and amenity issues with the existing employment in the area.	1.01ha (20)
	PO24	Land at Harden Road, Lydd	Flood Zone 1 and 2	The majority of the site falls outside of the flood hazard area in the SFRA, with only a small area in 'low' or 'moderate'. A suitable vehicle access would need third party land so it is unlikely that this site could come forward.	1.61ha (360)
	1016/PO 30	Land North Off Boarmans Lane, Brookland	Flood Zone 1	Falls outside of the flood hazard areas identified in the SFRA. The site lies to the south of the Brookland bypass which is more open and reflects the rural nature of the historic part of the settlement. Development here would have a detrimental impact on this character and lead to the conjoining the two distinct parts of the settlement. The land is suitable for open space in relation to the other allocated sites.	0.51ha (10)
	1017	Land South of Boarmans Lane, Brookland	Flood Zone 3	Falls outside of the flood hazard areas identified in the SFRA. Large site located to the south of the historic part of the village, which has a number of constraints including setting of the Conservation Area and Listed Buildings and on site watercourses.	9.2ha (184)

Ward	SHLAA Ref	Address	Flood Zone	Comments	Area (Estimated No. of dwellings)
				Development would result in encroachment into the countryside. Site has been identified for open space.	
	329	Pepperland Nurseries, Boarmans Lane, Brookland	Flood Zone 1, 2 & 3	Not within the SFRA Flood Hazard areas. The site is, however, remote in terms of access to local services; development of the site could have a detrimental impact on the conservation area; and KCC Highways has raised concerns as there is no footway along Straight Lane.	1.72ha (34)