SHEPWAY LOCAL DEVELOPMENT FRAMEWORK

EXAMINATION OF THE SHEPWAY CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT

Statement on behalf of the New Romney Area of Strategic Change Landowners (excluding Romney Marsh Potato Company)

Written Statement for Matter 5: Areas of Strategic Change- and Other Matters [Core Strategy policies: CSD8]

Are the Core Strategy’s proposals for other Areas of Strategic Change realistic, deliverable, adequately justified and consistent with national and regional policies?

Examination Questions: 5.1 and 5.2
1. Introduction

1.1. This Statement has been submitted jointly by the landowners comprising the New Romney Area of Strategic Change (excluding the Romney Marsh Potato Company (RMPC) landowner, who has prepared separate representations to the Core Strategy).

1.2. The New Romney Area of Strategic Change Landowners (excl RMPC) continue to work with the Council and key Stakeholders on emerging proposals for the identified New Romney Strategic Change Area and are committed to an iterative Masterplan process following adoption of the Core Strategy.

1.3 A revised Policy CSD8 is contained at Appendix 1 which was prepared by the Council following Regulation 25 consultation on the Submission Plan. This is supported as a preferred draft. The new draft addresses some of the issues raised in the Examination questions.

APPENDIX 1
2. Question 5.1

Is the level of detail presented in policies CSD6-CSD9 (and supporting text and diagrams) appropriate for inclusion within a Core Strategy? For example does the “broad locations” for development prejudice the consideration of detailed sites in future DPDs? Is it clear how these proposals will be taken forward in future DPD’s?

a) Summary of Position

2.1 This response relates to Policy CSD8 only. As far as the Broad Location is concerned, the level of detail in the policy is both appropriate and necessary for inclusion in the Core Strategy, as it guides the site’s deliverability in the following ways:

- By facilitating timely production of a suitable Masterplan following adoption of the Core Strategy. In this regard, the identification of the Area of Strategic Change provides the necessary strategic policy context for the Masterplan;

- By providing confidence to commit land owners to work/invest collaboratively;

- By giving confidence to the Romney Marsh communities that the development will meet identified community needs;

- By providing certainty to infrastructure providers to assist in their investment decisions and programming; and

- By ensuring that the Local Planning Authority has an appropriate policy vehicle upon which to secure community objectives.

2.2 The broad location does not prejudice the consideration of detailed sites in the Site Allocation DPD. The Area of Strategic Change has been identified based on an appropriate and credible evidence base. Other sites will still be identified through the Site Allocation DPD process as necessary. Public consultation and detailed background studies have been undertaken including a Strategic Housing Land Availability Assessment (SHLAA), a Strategic Flood Risk Assessment (SFRA) and a number of other important environmental and demographic studies to create a suite of documents. In addition, supporting environmental and masterplanning work was produced by the New Romney Area of Strategic Change Landowners. These reports are available through the following website address www.newromneyconsortium.wordpress.com and via the council’s evidence base. All of the
b) **Is the Level of Detail Suitable for Inclusion within a Core Strategy?**

2.3 Policy CSD8 is supported by explanatory text and a key diagram. The level of detail provided on the key diagram is necessary to guide a future Masterplan process and is entirely appropriate for an Area of Strategic Change in a Core Strategy.

2.4 The key diagram is important for a number of reasons:

- It provides a clear visual indication of the land that is required to deliver the New Romney Area of Strategic Change. The identification of the land is necessary to give land owners and infrastructure providers sufficient certainty to comprehensively plan the site through a Masterplan process;

- It provides context for the proposed development illustrating its role as part of a wider vision for New Romney and the Romney Marsh as a whole.

- It provides flexibility by identifying potential additional land that may or may not be needed to deliver the Area of Strategic Change.

2.5 The explanatory text is helpful. It explains why development has been channelled to New Romney and why the location is the most appropriate for the required scale of development.

2.6 Policy CSD8 fulfils an important function as it sets out the key requirements that must be met before a proposal will be considered acceptable to the Local Planning Authority. These are:

   a. The development should provide around 300 dwellings. The indication of the scale of the development is an important target to provide focus for both land owners/developers and assist them to create a comprehensive masterplan for the area. It also assists infrastructure providers understand what future demands will be so that they can help with the implementation of the development. Furthermore, it is important to provide clarification to the local community;

   b. The development will provide a range and mix of housing including 30% affordable homes. It is appropriate for the affordable homes target to be prescribed. It is founded against a Strategic Housing Market Assessment in accordance with the NPPF (para. 159);
c. The site is located within close proximity of New Romney Town Centre but it is recognized that the present pedestrian and cycle linkages require improvement to minimise car use. This helps to meet the aims of NPPF by giving people choice about how they travel;

d. Connectivity across the site is considered to be beneficial as it will assist community integration;

e. It is considered appropriate to ensure that the schools playing fields are protected to the extent that they meet the school’s ongoing needs in accordance with the NPFF (para.74);

f. Archaeological studies undertaken include desk based and intrusive surveys and indicated a need to proceed with caution to ensure that archaeological matters are properly respected as required by NPPF (para.134 and 135). Archaeological Evaluations have already been undertaken and made available to the Council (An Archaeological Evaluation of Land at Rolfe Lane, New Romney Archaeology South-East, 2010 and Ashford Road New Romney, Desk – based archaeological assessment, Canterbury Archaeological Trust, 2010);

g. Flood Risk has understandably been a central concern in the production of the Core Strategy and it is appropriate that the Core Strategy properly protects that position. However, it is noted that there is already a good understanding of the land within the Area of Strategic Change. The Strategic Flood Risk Assessment (SFRA) commissioned by the Council and the landowners’ Flood Risk Assessment (FRA for Proposed Development of the Land at Cockreed Lane, New Romney, Herrington Consulting, 2010) demonstrate the suitability of the identified land. The SFRA indicates why the site is the most sequentially preferable land in accordance with the NPFF (paras. 94 and 99 to 102). The FRA demonstrates that the site can be developed properly subject to meeting a number of mitigation requirements. The ecologists and flood risk engineers worked with the masterplanners to indicate how drainage solutions can be utilised to the mutual benefit of the local landscape and local biodiversity;
h. A Transport Assessment (Iceni Transport, 2010) has been undertaken and it has identified the need to address a number of offsite highway improvements, none of which are undeliverable (NPFF paras. 32 and 35).

c) **The Consideration of Detailed Sites in Future DPDs**

2.7 The broad location does not prejudice the consideration of detailed sites in the proposed Site Allocation DPD, as other sites are required to deliver the strategy for the Romney Marsh and will need to be identified in the Site Allocations DPD. Importantly, the Core Strategy differentiates between the level of housing to be delivered in the Area of Strategic Change and the level of housing for the Marsh as a whole.

2.8 The National Planning Policy Framework advocates that Local Plans should plan positively for the development and infrastructure required in the area and it should, "indicate **broad locations** for strategic development on a key diagram and land use designations on a proposals map" (para. 157, page 38). The approach taken in the Core Strategy is consistent with this advice with smaller scale allocations to be identified in the forthcoming Site Allocations DPD.

2.9 Romney Marsh is accurately described in the Shepway Core Strategy as a distinct “character area”. It comprises a flat marshland with a steep inland boundary formed from the old shoreline rising sharply to the north and west. Its geography has historically meant that it has developed its own socio-economic characteristics. Within South East Kent it is seen as a relatively remote area isolated from its nearest neighbours Ashford, Folkestone and Rye. Although the Marsh forms part of the Shepway District area there continue to be marked political tensions between Marsh communities and the communities to its North. In all these respects Romney Marsh is distinctly separate from the other parts of Shepway District.

2.10 The separation of the Marsh from the North Downs and Folkestone and Hythe to the North is central to the Core Strategy and has been generally supported through consultation during the plan preparation process. There appears to be generally acceptance that controlled growth is a good thing and necessary to meet future local needs.

2.11 The initial consultation is summarised in the Shepway LDF Core Strategy Preferred Options Report: 
"The general consensus from the consultation was that any new development should be concentrated on the larger towns/settlements to avoid sprawl into the countryside and that
natural assets such as environmental quality should be protected, enhanced and better promoted". Shepway LDF Core Strategy Preferred Options, 2009.

2.12 Within the Marsh, New Romney is the dominant town and functions as a service centre for the Marsh as a whole. It is the main population, employment and retailing centre, providing secondary education and most other community facilities serving the Romney Marsh.

2.13 Within New Romney the Broad Location is identified as the key strategic site for meeting future growth. This area of land has been consistently advanced as the most appropriate area principally because of its close proximity to the Town Centre, the sequential approach to flood risk leads to the same area.

2.14 It is notable that no alternative strategic sites are being pursued on Romney Marsh. It is also the case that New Romney Council do not object to the Broad Location nor are there substantial objections from local people.

d) How is the proposal to be taken forward?

2.15 The Broad Location area has been assessed to ensure that there are no constraints that would prevent its development. Five land owners controlling the major part of the site have collaborated on an initial Masterplan (Outline Feasibility Study- Guy Holloway Architects) supported by necessary studies referred to above to test the deliverability of the site. It is clear that the site is deliverable and developable and capable of providing the necessary infrastructure to deliver a high quality development.

2.16 When the Core Strategy is adopted, (provided it includes the Broad Location as presently intended), the land owners are committed to working with the Council and other stakeholders to prepare a comprehensive Masterplan for the area of Strategic Change. The Masterplan will set the context for future planning application/s.

e) Summary and Conclusions

2.17 In summary it is considered entirely appropriate to identify the land to the North of New Romney as a Broad Location to provide confidence for landowners/developers, infrastructure providers and clarity for local communities. This is a critical part of the Core Strategy and
essential to meeting the future needs of Romney Marsh inhabitants. It accords with the approach set out in the NPPF, particularly para. 157.

2.18 The New Romney Area of Strategic Change Landowners (excluding NRPC) are working collaboratively on an integrated development approach for the Area of Strategic Change. Initial Masterplanning work and environmental and technical studies have been undertaken to support an initial engagement process with local people and stakeholders. Subject to the Core Strategy being passed as sound, the landowners look forward to participating in an integrated, iterative Masterplan process for the area to optimise the development potential of the land and the contribution that the development can make to the wider vision for the Romney Marsh.
3. **Question 5.2**

*Notwithstanding the above, are the details of the developments proposed policies CSD8 (such as broad locations, scale of housing and likely infrastructure needs) adequately justified by the evidence base? Why have other sites (including sites that are now being promoted by representors) been discounted?*

3.1. The Area of Strategic Change at New Romney is justified by a credible evidence base including the Shepway SHLAA and the SFRA whilst the amount of development for Romney Marsh and New Romney is justified based on a number of cross cutting studies that form a key element of the evidence base upon which the Core Strategy has been produced.

3.2. The locational characteristics of the selected land and its comparative flood risk benefits compared to other land on the Marsh identified the landholding as the only realistic growth location for the Romney Marsh.

3.3. The approach taken to the New Romney Area of Strategic Change is predicated on a Masterplan process following adoption of the Core Strategy. Initial work has provided a good insight as to development constraints, infrastructure requirements and local peoples’ priorities and concerns and it is evident that the Masterplan will need to build on these themes. Whilst the level of detail will be added to through the Masterplan process, there is inherent flexibility in the Plan through the identification of reserve land in case there are deliverability issues. However, at this stage, there is no evidence to suggest that there is an inherent deliverability issue.

3.4. The Council will comment on how other sites have been discounted but it is a matter of fact that the Broad Location proposal at New Romney is not challenged by any other substantive alternative.