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From: Chris Pendrey [redacted]
Sent: 14 October 2026 09:13
To: Planning
Subject: Planning application: 26/1476/FH

[redacted]

To: Planning Services
Folkestone & Hythe District Council

Planning application: 26/1476/FH
Site: Land North of Cockreed Lane, New Romney, TN28 8FH
Proposal: Outline planning application for up to 110 dwellings, including public open space, landscaping and associated works, with all matters reserved except access

Formal objection

Dear Sir/Madam,

I am writing to formally object to planning application **26/1476/FH** for the construction of up to 110 dwellings on land north of Cockreed Lane, New Romney.

I live [redacted] I recognise the need to provide additional housing, including affordable housing, but housing need should not override the requirement to select suitable and sustainable sites or to properly address flood risk, landscape harm, drainage, infrastructure and the long-term safety of future residents.

My objection is based on the following material planning considerations.

1. Development of an unallocated countryside site

The application site is currently approximately 4.71 hectares of agricultural land beyond the established built edge of New Romney. The proposal would introduce up to 110 homes, new roads, drainage infrastructure, a pumping station, play facilities and associated urban development across what is presently an open field.

The site is not currently allocated for housing development. Granting permission would therefore allow a substantial outward expansion of the settlement onto open agricultural land outside the plan-led allocation process.

The need for housing should not automatically justify development on any available field. The council should be satisfied that this location is both necessary and suitable when assessed against the development plan as a whole and when compared with less harmful and lower-risk alternatives.

2. Harm to landscape character and the rural setting of New Romney

The field makes an important contribution to the open and rural character of the area. It provides a clear transition between the existing settlement and the wider Romney Marsh landscape.

The proposed development would move the built edge of New Romney materially northwards. The introduction of housing, roads, street lighting, parked vehicles, drainage basins, a pumping station and associated infrastructure would permanently urbanise the site and alter the character of this part of Cockreed Lane.

Although the illustrative masterplan proposes landscaping and boundary planting, planting cannot fully replace the openness of an agricultural field or screen the development during its establishment period. Nor would landscaping remove the permanent urbanising effects of buildings, lighting, traffic and domestic activity.

My concern is therefore not simply the loss of a private view. It is the wider loss of openness, agricultural character and the rural setting of the settlement that can presently be experienced from surrounding homes, public routes and the wider landscape.

3. Predominant location within Flood Zone 3

The applicant's Flood Risk Assessment confirms that the site lies within Flood Zones 2 and 3 and that it is predominantly within Flood Zone 3 when assessed without the benefit of flood defences. Residential development is classified as a "more vulnerable" use for flood-risk purposes.

The assessment explains that the site falls within the undefended tidal flood extent for the 1-in-200-year event, including climate change. The applicant's case relies heavily on the presence and continued operation of coastal flood defences and on modelled defended and breach scenarios.

The fact that flood defences reduce the probability of flooding does not remove the underlying consequences of locating a substantial residential development in a mapped high-risk area. Flood defences may be maintained, improved, overtopped or affected by events beyond their design standard during the lifetime of the development.

The application should therefore be approached on the precautionary basis that this is more-vulnerable residential development proposed within an area of significant underlying flood risk.

4. Sequential Test has not been adequately demonstrated

The purpose of the Sequential Test is to direct development towards areas with the lowest probability of flooding. However, the applicant's Flood Risk Assessment expressly states:

> "A full analysis of the availability of alternative sites is beyond the scope of this assessment."

Despite this, the assessment proceeds on the basis that the Sequential and Exception Tests are satisfied.

This is a significant weakness. The question is not simply whether flood risk can be engineered or managed within the application boundary. The council must first be satisfied that there are no reasonably available and appropriate sites capable of accommodating the development, or contributing towards the identified housing requirement, in areas at lower risk of flooding.

The council should not accept an assessment that excludes a full evaluation of alternative sites while simultaneously concluding that development of predominantly Flood Zone 3 land is justified.

I therefore request that the council independently scrutinises:

- The geographical area used for the Sequential Test
- The identification and treatment of lower-risk alternatives
- Whether the housing requirement could be met through a combination of smaller sites
- Whether the rejection of alternative sites has been reasonable and consistent
- Whether the site should be treated as unallocated land requiring a full Sequential Test

Planning permission should not be granted unless the council is satisfied that the Sequential Test has been completed robustly and transparently.

5. Exception Test and claimed sustainability benefits

Because the proposal is for more-vulnerable development in Flood Zone 3, the applicant accepts that the Exception Test must be passed.

The principal wider benefits relied upon by the applicant appear to be the provision of housing and public open space. These benefits must be weighed properly against the site's flood risk and should not automatically be treated as outweighing that risk.

Public open space, landscaping and drainage infrastructure are expected components of a development of this scale. They should not, without further justification, be treated as exceptional community benefits sufficient to outweigh locating more-vulnerable development within Flood Zone 3.

The council should require a much clearer demonstration of the site-specific sustainability benefits and why these benefits cannot be delivered on land at lower flood risk.

6. Extensive mitigation demonstrates the site's inherent constraints

The proposal depends upon an extensive package of flood mitigation, including:

- Raising the development platform and finished floor levels by at least 600 mm
- Restricting sleeping accommodation to first-floor level and above
- Providing upper-floor refuge
- Installing attenuation basins, swales and controlled drainage
- Preparing a future Flood Management Plan
- Registering future residents with the Environment Agency flood-warning service
- Retaining safe access and egress
- Relying on the continuing performance of coastal flood defences

These are not minor design details. They are fundamental to whether the development would be safe.

The need to prevent sleeping accommodation at ground-floor level and provide upper-floor refuge is particularly significant. It demonstrates that the development is being adapted around an existing hazard rather than being directed to a location where that hazard is avoided.

The council should also consider the landscape and drainage consequences of raising a substantial development platform by 600 mm. Land raising could increase the visual prominence of the houses, alter relationships with neighbouring properties and affect surface-water movement.

7. Essential flood and drainage details are being deferred

The applicant proposes that a Flood Management Plan and a number of detailed drainage matters be secured later, either by condition or through reserved-matters applications.

This is an outline application, but the council is still being asked to approve the principle of up to 110 dwellings. Essential matters affecting whether that maximum development can be accommodated safely should not be deferred if they could influence the acceptable number, layout or location of dwellings.

Before granting outline permission, the council should have sufficient information to establish:

- The final levels across the entire development
- The effect of land raising on surrounding properties and land
- The capacity and long-term maintenance of the attenuation system
- The discharge arrangements to the northern watercourse
- The response to drainage exceedance or mechanical failure
- Safe access during extreme events
- The content and practical operation of the Flood Management Plan
- Responsibility for maintaining the SuDS and pumping infrastructure throughout the development's lifetime

8. Groundwater and absence of site-specific intrusive investigation

The Flood Risk Assessment refers to groundwater encountered in a nearby borehole. It also states that, at the time of writing, no site-specific intrusive ground investigation had been undertaken to confirm the geology, permeability or groundwater levels beneath the site.

This is important because the drainage strategy, construction of the raised development platform and resilience of underground infrastructure will all depend on actual ground and groundwater conditions.

The suitability of the drainage strategy should be supported by adequate site-specific investigation before permission is granted, rather than relying primarily on nearby information and assumptions that are to be confirmed later.

9. Conditional nature of the sewerage and pumping arrangements

Southern Water identifies a number of requirements and qualifications. These include:

- Flood-resilient and watertight foul-drainage infrastructure
- Prevention of flood-water ingress into the sewerage network
- Approval of foul and surface-water drainage arrangements
- A suitable non-habitable zone around the proposed pumping station
- No habitable rooms within 15 metres of the boundary of an adoptable pumping station
- Suitable access for the pumping station
- Protection of public sewerage apparatus
- Separate approval for connections to the public sewerage system

Southern Water also notes that the area appears prone to high groundwater, and that flood water entering the foul-drainage system could impede drainage from the development and potentially affect the downstream system.

Although Southern Water identifies current capacity for the stated foul flow, its response should not be treated as an unqualified endorsement of the scheme. Several important matters remain dependent on detailed design, consultation and approval.

The size and position of the pumping-station exclusion area could also affect the developable area and the ability of the site to accommodate 110 dwellings alongside drainage, landscaping, open space and appropriate separation from existing properties.

10. Pressure on healthcare and community services

The submitted Health Impact Assessment identifies the area as having:

- A rural and coastal population with an older age profile
- Longer distances to GP, dental, pharmacy and leisure services
- Existing geographical barriers to services
- A population with greater sensitivity to environmental and socioeconomic changes

The assessment explicitly acknowledges that the additional population would place demand on GP, dental and NHS services. Nevertheless, it classifies the effect as neutral and refers only to a possible financial contribution through a planning obligation or infrastructure mechanism “where justified”.

That does not demonstrate that sufficient capacity exists or that the impact will be adequately mitigated. Before permission is granted, the council should obtain clear evidence from the relevant healthcare bodies regarding existing capacity, the additional demand expected from 110 homes and the specific mitigation or financial contribution required.

The cumulative effect of this proposal and other planned or permitted housing developments in the New Romney and Romney Marsh area should also be assessed.

11. Apparent incompleteness within the Health Impact Assessment

The submitted Health Impact Assessment contains unresolved placeholders, including references such as:

- “[Confirm % in DAS]”
- “[XX%] affordable housing”
- “[Confirm in Energy Statement]”

These appear within a document described as a final report and concern matters presented as benefits of the proposal.

Unconfirmed design standards, affordable-housing percentages or energy measures should not be given positive weight in the planning balance. The council should require a corrected and completed assessment that distinguishes between firm commitments and possible details to be determined later.

12. Highways, traffic and dependence on private vehicles

A development of up to 110 homes would generate additional vehicle movements on Cockreed Lane and the surrounding road network. The rural location and dispersed nature of services are also recognised within the submitted Health Impact Assessment as contributing to high car dependence.

The council and highway authority should carefully assess:

- The safety and capacity of the proposed access
- Pedestrian and cyclist safety on Cockreed Lane
- The cumulative effect of existing and committed development
- The accessibility and frequency of public transport
- Access to schools, healthcare, shops and employment
- The effect of construction vehicles and later residential traffic
- Whether the development would provide realistic alternatives to private-car use

The provision of internal footways and cycle routes does not itself demonstrate that residents would have safe and practical routes to the services they need outside the site.

13. Construction impacts on established residents

The Air Quality Assessment identifies medium pre-mitigation risks from earthworks, construction and the tracking of mud and dust onto surrounding roads. It recommends a Dust Management Plan, inspections, wheel washing, road sweeping, covered loads and other control measures.

The assessment also states that detailed construction traffic information was not available and instead assumes that heavy-vehicle movements would remain below the relevant screening criterion.

Given the proximity of existing homes, any permission would need a comprehensive and enforceable Construction Environmental Management Plan covering:

- Working hours
- Construction traffic routes
- HGV numbers and timing
- Dust and particulate monitoring
- Noise and vibration
- Mud and debris on public roads
- Wheel washing and road cleaning
- Lighting
- Community complaints and corrective action

These controls would not overcome the fundamental planning objections, but they would be essential if permission were granted.

14. Outline nature of the application and maximum development quantum

Only access is being determined at this stage. Layout, scale, appearance and landscaping are reserved. The submitted masterplan is therefore illustrative rather than a final, enforceable layout.

The council is nevertheless being asked to approve a maximum development of up to 110 dwellings. It must therefore be satisfied that this number can be accommodated while providing:

- Appropriate landscape buffers
- Acceptable separation from existing homes
- Effective flood and drainage infrastructure
- The pumping-station exclusion zone
- Safe access and internal movement

- Adequate open space
- Biodiversity measures
- Suitable housing design and amenity
- An appropriate transition to the open countryside

If these matters have not been demonstrated, the council should not approve the maximum figure and leave the resulting conflicts to be addressed at reserved-matters stage.

Conclusion

For the reasons outlined above, I respectfully request that Folkestone & Hythe District Council refuses planning application **26/1476/FH**.

The proposal would introduce a substantial housing development onto an unallocated agricultural field at the rural edge of New Romney. The site is predominantly within Flood Zone 3 and the applicant's approach depends upon significant land raising, continuing flood-defence performance, first-floor sleeping accommodation, upper-floor refuge, flood warnings and a future Flood Management Plan.

Most importantly, the submitted Flood Risk Assessment acknowledges that a full analysis of alternative sites falls outside its scope. The application therefore does not, in my view, provide a sufficiently robust basis for concluding that the Sequential Test has been satisfied or that this more-vulnerable development must be located on land at this level of flood risk.

There also remain material concerns concerning landscape harm, countryside encroachment, agricultural-land loss, groundwater, drainage, pumping-station requirements, healthcare capacity, transport sustainability and the deferral of essential matters to later conditions and reserved-matters applications.

Please record this representation as a formal objection and take it into account when determining the application.

Yours faithfully,

Chris Pendrey & Jessica Pendrey

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