Introduction

Ashford Borough Council adopted the Urban Sites and Infrastructure Development Plan Document on the 18th October 2012.

This statement has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), which requires a statement to be produced on the adoption of a plan or programme, to detail:

1. How environmental considerations have been integrated into the plan or programme;
2. How the Environmental Report has been taken into account;
3. How opinions expressed through public consultation have been taken into account;
4. The reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with;
5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Sustainability Appraisals (SA) help local planning authorities fulfil their objective of contributing to the achievements of sustainable development in preparing plans through a structured assessment of objectives against key sustainability issues for an area.

This statement examines each of these points in turn.
1) How environmental considerations have been integrated into the plan or programme

1.1 Environmental, economic and social considerations work together in securing sustainable development for an area. These three dimensions are embedded in the Core Strategy (2008) through a vision and set of guiding principles to deliver growth in the Borough to 2021. The Core Strategy has been subject to its own sustainability appraisal and includes a broad vision for the urban area.

1.2 The vision for the Ashford urban area is broadly set out within Chapters 2 and 4 of the Core Strategy and is as follows:
   - retain the compact growth model based on the existing urban area;
   - focus development on brownfield sites before the release of peripheral greenfield sites;
   - to maximise the potential for improvement and regeneration within the urban area whilst ensuring that redevelopment is of an appropriate use, scale and density and provides a high quality living environment;
   - improve the quality of the existing urban area through a range of measures including raising design standards, increasing density and applying challenging sustainability standards to development;
   - create mixed use places where a range of activities can take place – including local jobs, services and facilities within high quality and attractive environments;
   - linking the parts of the urban area through a high quality public transport system so that people can easily access the town centre;
   - help to combat areas where there are existing social and environmental problems.
   - better access to a wider range of jobs and services by focusing development where it can enable key improvements to the quality of the urban area and its infrastructure;
   - improve connections between proposed and existing development areas;
   - provide a range of opportunities to enable the market to respond to the growth targets, by providing for different types of development in a variety of locations;
   - ensure that capacity to support further development within the urban area is improved.

1.3 The Urban Sites and Infrastructure DPD takes forward this strategic vision and applies it to the policy approach. The objectives set out below clearly
- retaining the compactness of the urban area;
- opportunities to improve the existing urban environment and deliver the key infrastructure necessary to serve a rapidly growing town;
- focusing on the potential to sustain local shops and services, the implementation of new facilities to improve the sustainability and meet the needs of the wider Growth Area and securing the regeneration and revitalization of parts of the urban environment;
- the vision for any release of sites on the urban periphery in this DPD is to generate a high quality new development whilst minimizing the impact on the character of the surrounding countryside;
- a range of growth opportunities establishing a balance between ‘within’ the existing urban area and ‘on the edge’ of it, providing for different types of development in a variety of locations;
- deliver the right quantity and mix of development in the Ashford urban area;
- new development to be of a quality that will improve the existing urban fabric;
- create new places that are sustainable and attractive places to live and work;
- ensuring that developments are designed to the highest possible standards;
- improving design quality, creating developments that have a real sense of place, ensuring appropriate residential densities and dwelling mixes are all crucial in the creation of better places to live and work;
- to achieve higher levels of sustainability in their designs and layouts, ensuring that sustainable design and construction is embedded into schemes;
- achieving a good design for every site.

2) How the Environmental Report has been taken into account;

2.1 The Sustainability Appraisal has contributed to the development of the Urban Sites and Infrastructure DPD by assessing the predicted effects of the DPD proposals against sustainability criteria in relation to sustainable development. The appraisals have been transparent and have enabled consultation with environmental bodies throughout the DPDs evolution.
2.2 The sustainability appraisal process for the Urban Sites and Infrastructure DPD incorporates the requirements of both the Planning and Compulsory Purchase Act (Section 19(5) and 62(6)) and the SEA Directive (EU Strategic Environmental Assessment Directive 2001/42/EC).

2.3 The SEA/SA process began with the preparation and consultation on the SA scoping report for the DPD. A combined Scoping Report was prepared for the Urban Sites and Infrastructure DPD, the Chilmington Green Area Action Plan and Tenterden and Rural Sites DPD. Consultation bodies were consulted on the scope and level of detail of the information to be included within the DPD over a five week period in February 2007. This included the three environmental bodies, the Environment Agency, English Heritage and Natural England; in addition views were sort from all neighbouring authorities, as well as key relevant social and economic agencies, such as Learning and Skills Council, Ashford Primary Care Trust, Southern Water, and the Housing Corporation etc.

2.4 In developing the Sustainability Appraisal Framework for the Urban Sites and Infrastructure DPD the starting point was to utilise the framework used for the Core Strategy SEA/SA, this ensured consistency across all local policy development plans. The Sustainability Appraisal Framework set out within the DPDs Scoping Report (February 2007) incorporated some minor tweaks to ensure the appraisal was directly relevant to the urban area. An additional ‘transport’ section was added as this was identified as a critical issue for the future development of Ashford.

2.5 A review of all new and relevant plans, programmes and strategies since the preparation of the Core Strategy Scoping Report took place at the start of the SA process. The initial baseline information and sustainability issues were set out within the Core Strategy Scoping Report and the ‘Handbook for Change’ study (2001, updated 2003) and the Greater Ashford Development Framework SA/SEA process (2004-2005). As part of the Urban Sites and Infrastructure Scoping Report this information was reviewed and new and relevant baseline information and environmental issues for the urban area added to the Scoping Report.

2.6 In order to facilitate legibility and ease of use, the Sustainability Appraisal Framework used sustainability objectives and criteria arranged according to themes set out in a matrix, as the basis for assessing the DPD. The draft objectives of the Urban Sites and Infrastructure DPD were tested against the LDF Sustainability Appraisal Objective to ensure compatibility. This task was consulted on with the environmental bodies as part of the Scoping Report.

2.7 The Sustainability Appraisal Framework including the Sustainability Appraisal Objectives were reviewed in October 2007 to take account of comments received during consultation on the Scoping Report (February
2007) and also to ensure that the SA themes and SEA topics used during the Core Strategy process were fully integrated into a manageable set of criteria. The amendments resulted in a new set of 20 SA Objectives, which were assessed against the SEA Directive to ensure both the requirements of the SEA Directive and SA were met.

2.8 The final Sustainability Appraisal Framework used to appraise options was updated following the adoption of the Core Strategy. It was found that a number of Sustainability Appraisal Objectives were already covered by Core Strategy polices and could be removed. Also, some of the criteria in the original SA framework could not easily be answered in the initial stages of the site assessments without predicting the use, site layout and design assumptions of development and so were removed. These amendments resulted in a final set of 13 SA Objectives, which again were assessed against the SEA Directive to ensure both the requirements of the SEA Directive and SA were met.

2.9 In 2008, the Council produced an 'Issues and Options Report' for the Urban Sites and Infrastructure DPD. This report presented a number of options and reasonable alternatives for the urban area to pursue, including options for site allocations, phasing, housing, employment, infrastructure provision, transport, recreation, sport and play, and community facilities.

2.10 The Issues and Options Report identified a number of potential development sites within the urban area to initially consult on. These sites were identified from a variety of sources including:

- the Core Strategy
- the Greater Ashford Development Framework
- the Urban Capacity Study (October 2006)
- Unimplemented or part implemented Local Plan (2000) sites
- Sites put forward by landowners/developers within the urban area during the initial stages in the preparation of the Core Strategy.
- Informal sites put forward by landowners/developers (last 3 years)

2.11 Consultation on the Issues and Options Report took place between December 2008 and February 2009. The Scoping Report was also made available for comment alongside the Issues and Options Report.

2.12 The Council undertook an initial appraisal of sites through a series of 'sieves' to determine those sites to take forward, a determining criteria was that the site needed to be in accordance with the Core Strategy, as well as national and regional policy. Appendix 1 of the Sustainability Appraisal - Regulation 27 Publication Version includes a table to show the sites identified within the Issues and Options Report, how they were
submitted, and whether they were appraised against SA Objectives, and if not, the reason why sites were not taken forward.

2.13 The Sustainability Appraisal – Regulation 27 Publication Version expands on and seeks to address the identified sustainability issues and problems identified within the Scoping Report. This together with the outcomes from the Issues and Options consultation and further analysis of existing issues and policies (derived through the adoption of the Core Strategy) lead to a number of conclusions that shaped the content of the Urban Sites and Infrastructure DPD Submission Version. The detailed analyses together with conclusions are set out within the Sustainability Appraisal – Regulation 27 Report.

2.14 SA guidance directs that the local planning authority should develop options for the DPD by working with the community and stakeholders and also improve the effects of any existing ‘saved plan’ policies.

2.15 A review of all 'saved' Local Plan policies was undertaken, for both topic and site policies. Some policies were geographically specific to the urban area and needed to be appraised to see whether they were still relevant, and if so, whether they should be reviewed / amended and taken forward into the Urban Sites and Infrastructure DPD. A number of ‘saved’ Local Plan site policies were either already developed, or under construction and therefore did not require assessment for inclusion within the Urban Sites and Infrastructure DPD. The remaining site policies were assess in detail against the SA Objectives to decide whether a new policy would be required within the DPD, or whether the Local Plan policy should be delete or saved.

2.16 The broad sustainability effects of the DPD were assessed and predictions made about the topic policy coverage of the DPD against the original 20 sustainability criteria identified within the Scoping Report. This highlighted areas that did not need further coverage within the DPD as they were covered in other LDF documents as well as topic policies that should be taken forward within the DPD.

2.17 The Sustainability Appraisal assessed the inclusion of particular topic policies against the Sustainability Appraisal Framework that has been highlighted as being suitable for taking forward within the DPD, these included Green spaces policy, retention of employment sites policy, strategic park – Conningbrook policy, recreation, sport and play facilities policy, landscape character policy, infrastructure provision policy. The assessment concluded that the inclusion of these policies would have a positive effect on the DPD.
2.18 The Sustainability Appraisal also tested a number of remaining options against the Sustainability Appraisal Framework before the final content of the Submission DPD could be formed, these included:

- whether to phase the residential site allocations and release brownfield land before Greenfield land?
- whether to allocate any further sites for housing development, other than Core Strategy and Local Plan (2000) allocations?
- whether to allocate employment sites that are not restrained by major infrastructure, or whether employment allocations should be restricted to the four major strategic locations (Eureka, Henwood, Orbital, Sevington).

2.19 The final Sustainability Appraisal for the Urban Sites and Infrastructure DPD was consulted on alongside the Regulation 27 Publication Version of the DPD, between December 2010 and February 2011. The Council also consulted with the statutory consultees, including the Environmental Bodies and gave interested parties an opportunity to comment on the Plan before formal submission was made. The SA provided detailed justification for the policy approach set out in the Urban Sites and Infrastructure DPD and demonstrated how this approach has evolved.

2.20 An Appropriate Assessment was undertaken on the DPD as a separate appraisal to the SA in order to meet the requirements of Regulation 48 of the ‘Habitat Directive’ (Regulation 1994) and concluded that the DPD was unlikely to have any adverse impacts on the integrity of any Natura 2000 sites.

2.21 During consultation on the Regulation 27 Publication Version nine additional housing and employment sites were promoted for development by landowners and/or developers. The Council informally consulted on these nine sites to enable everyone to comment on them between May and June 2011.

2.22 The Council issued a Sustainability Appraisal Update October 2011, which took account of comments received and the Council’s response to those comments during consultation at Regulation 27 Publication Version as well as informal consultation on nine additional submitted sites.

2.23 The amended SA was consulted alongside the publication of the Proposed changes to Regulation 27 Publication Version (October 2011 – December 2011) and included changes to align with the proposed changes, and additional appraisals of omission sites, where these had not already been appraised.

2.24 In February 2012, the Council issued an Addendum to the SA which reflected the updated evidence gaining through the production of the
Employment Development Background Document (revised October 2011). The SA originally concluded that there was some minor benefits in seeking additional employment sites for development beyond the 4 strategic core strategy locations (Eureka, Orbital Park, Henwood, Sevington), however the original figures used within the Employment Land Review (2008) were assessed against updated employment figures for Ashford and showed that the pro-rate jobs target for the DPD (2482 jobs) is likely to be comfortably exceeded and as such no additional employment allocations are required within the DPD than those already identified within the Core Strategy.

2.25 The Council submitted the ‘Submission Version’ of the Urban Sites and Infrastructure DPD to Government in February 2012 which triggered the formal Examination process. The content of the ‘Submission Version’ of the DPD was independently examined by a Planning Inspector, with the formal hearing sessions sitting between the 15\textsuperscript{th} and 17\textsuperscript{th} May 2012. The Sustainability Appraisal was submitted alongside the ‘Submission Version’ of the DPD and was a key part of the evidence base which supported the Plan’s policy approach.

2.26 Following the conclusion of the Public Examination hearing sessions into the soundness of the DPD, the Inspector concluded that some ‘main modifications’ would be necessary in order for the DPD to be found sound. The Council produced an Addendum to the SA to ensure the SA had covered the main modifications.

2.27 The Inspector then issued his report which recommended some minor amendments to the DPD to be found ‘sound’. None of the changes proposed by the Inspector required further appraisal through the Sustainability Appraisal process, given their minor nature.

2.28 The Council adopted the Urban Sites and infrastructure DPD on the 18\textsuperscript{th} October 2012. The final Sustainability Appraisal document and Addendums were published alongside the adopted DPD.

3) How opinions expressed through public consultation have been taken into account;

Key Environmental Bodies

3.1 The Urban Sites and Infrastructure Development Plan Document has been the subject of a number of informal and formal stages of consultation throughout its evolution. At each stage in the LDF preparation, the Council undertook a programme of public consultation on the DPD and recommendations made as to how the sustainability of the plan might be
improved prior to submission to the Secretary of State. In England the key environmental bodies are the Environmental Agency, English Heritage and Natural England who were consulted at every stage together with other key organisations, including:

- The Government Office for the South East
- Learning and Skills Council
- Ashfords Future
- Kent Chamber of Commerce
- English Heritage
- South East England Regional Assembly
- Housing Corporation
- Mid Kent Water
- Ashford Primary Care Trust
- Southern Water
- CABE
- Neighbouring Authorities (Shepway District Council, Swale Borough Council, East Sussex County Council, Dover District Council, Canterbury City Council, Tunbridge Wells Borough Council, Kent County Council, Maidstone Borough Council, Rother District Council).

3.2 Section 2 of this statement shows that a Scoping Report was prepared and consulted on with environmental bodies in February and October of 2007 to enable consultees to influence the shape of the plan. The next stages of consultation are set out below, in chronological order.

Consultation on Issues and Options under Regulation 25

3.3 The Issues and Options Report public consultation took place between 19th December 2008 and 13th February 2009. Inline with planning regulations, and the Council’s adopted Statement of Community Involvement, consultation was advertised in the local press, on the Council’s website and a letter was sent to all relevant stakeholders to notify them of the event. This included Parish Councils adjoining the urban area, all Councillors, libraries, and urban community forums as well as all relevant statutory bodies and individuals on our database that had requested to be kept informed. The Council received 670 representations from 60 consultees.

3.4 In January 2010 the Council held two exhibitions to show sites being proposed for allocation in the urban area. An exhibition on the 20th January at Julie Rose Stadium focused on sites in and around Willesborough and Kennington, and the other at Godinton Village Hall on the 27th January focused on sites in and around Godinton Park, the Warren and Singleton. Both exhibitions, however, contained information on all the sites being proposed. Participants had the opportunity to view
the proposed sites and speak to members of the planning policy team. Questionnaires and information packs were also available. Approximately 150 people attended these exhibitions.

Consultation on Publication version under Regulation 27

3.5 The Regulation 27 ‘Publication’ version of the Urban Sites and Infrastructure DPD went out for public consultation from 16th December 2010 to 4th February 2011. The consultation was advertised in the local press and on the Council’s website. Letters were sent to all the specific consultation bodies, including the environmental consultation bodies and general consultation bodies in accordance with our Statement of Community Involvement – First Review 2009. A letter was also sent to Parish Councils and any individual that had registered an interest in the document on the Councils database. Copies of the documents and representation forms were placed in the local libraries. The final SA/SEA Report for the Urban Sites and Infrastructure DPD was consulted on alongside the Regulation 27 Publication Version.

3.6 The Council also held two public exhibitions to advertise the consultation on Friday 21st and Saturday 22nd January. These were held in the two main shopping centres in town, County Square and Ashford Gateway, Park Mall. These were advertised on the Councils website and in the local press.

3.7 The exhibitions were carried out in easily accessible public places, which enabled people to have the ability to speak to members of the Policy Team and to view the Plan. Information leaflets which included details of how to make formal representations were also made available for people to take away. The exhibitions were held on days where it was felt it would capture the largest audience and generate interest from people who may not necessarily get involved in planning. Officers of the planning policy team also attended community forums and a public meeting at Willesborough Lees. We received a total of 831 representations on the Regulation 27 ‘Publication’ version of the DPD.

Submitted sites consultation – Informal

3.8 During consultation on the Regulation 27 Publication Version nine additional housing and employment sites were promoted for development by landowners and/or developers. The Council consulted on these nine sites to enable everyone to comment on them between 24th May and 20th June 2011, and a leaflet and comments form was produced and advertised on the Council’s website. A small number of consultees were also invited to comment by letter or email, these were mainly affected
residents/community groups and ward councillors. 89 comments were received during this informal consultation.

3.9 The Council issued a Sustainability Appraisal Update October 2011, which took account of comments received and the Council’s response to comments received during consultation at Regulation 27 Publication Version as well as informal consultation on nine additional submitted sites.

Consultation on Proposed changes to Publication version consultation

3.10 Following consultation on the Publication version of the DPD and Submitted sites, the Council considered the representations received and then proposed a number of changes. These changes were subject to 6 weeks period of public consultation from 21st October to 2nd December 2011. This additional consultation stage gave the public and other stakeholder the opportunity to make formal comments on the Council’s proposed changes only and the consequences of including them in the DPD, before the Council decided whether to submit the DPD to the Secretary of State for public examination. A total of 215 representations were received throughout this consultation period.

3.11 The amended SA was consulted alongside the publication of the Proposed changes to Regulation 27 Publication Version (October 2011 – December 2011) and included changes to align with the proposed changes, and additional appraisals of omission sites, where these had not already been appraised through the SA.

Consultation on Submission version under Regulation 30

3.12 The Council formally submitted the ‘Submission Version’ of the Urban Sites and Infrastructure DPD in February 2012 triggering the formal Examination process. The formal hearing sessions took place from 15th to 17th May 2012.

3.13 Following the conclusion of the Public Examination hearing sessions into the soundness of the DPD, the Inspector concluded that some ‘main modifications’ would be necessary in order for the DPD to be found sound. These included changes to the introduction section to include an NPPF update and two proposed new policies, as suggested by the Inspector, to include Policy U6B K College, Jemmett Road and Policy U0 Presumption in Favour of Sustainable Development. Policy U6B was appraised through US50 and US154 as part of the Sustainability Appraisal process, the Council produced an Addendum to the SA for the proposed Presumption in Favour of Sustainable Development.

3.14 Following consultation on the ‘Main Modifications’ the Inspector concluded through his report that subject to some minor amendment the DPD was
'sound' and should be adopted by the Council. None of the changes proposed by the Inspector required further appraisal through the Sustainability Appraisal process, given their minor nature.

3.15 The Council adopted the Urban Sites and infrastructure DPD on the 18th October 2012. The final Sustainability Appraisal document and Addendums were published alongside the adopted DPD.

4) The reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with

The Environmental Assessment of Plans and Programmes Regulations 2004 (12) (2) requires environmental reports to examine reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

The adopted Urban Sites and Infrastructure DPD, delivers a sustainable approach to development in the urban areas and is supported by a comprehensive Sustainability Appraisal. The SA has ensured that those sites allocated within the DPD represent the most sustainable options for development, and has influenced the final structure of the plan by appraising the DPD objectives and options resulting in a range of topic policies applicable within the urban environment.

The adopted DPD is consistent with the overall development targets, planning objectives and broad planning policy guidance for the urban area as set out within the Core Strategy. This has led to a plan that will improve the existing urban environment, contribute to the creation of high quality places, and help to bring forward key infrastructure needed for the towns growth as well as supporting the towns employment role by making employment allocations. The DPD fulfils the objectives of the Plan, identified at scoping stage of the process.

The Vision set out within the Urban Sites and Infrastructure DPD takes forward the principles established for the urban area in the Core Strategy which were subject to their own SA. The DPD objectives were tested against the Sustainability Appraisal Framework to ensure compatibility within an urban context.

All the residential site allocations within the DPD have been through a rigorous selection process against sustainability criteria to ensure the most suitable sites have been allocated against reasonable alternatives.
The SA has demonstrated that the predicted effects of implementing the topic policies and site allocations will have a positive effect on the sustainability of the urban environment.

5) The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Annex 1(i) of the SEA Directive requires that significant environmental effects of implementing the plan are monitored. The SEA/SA for the DPD proposed a number of additional indicators to those listed in the Core Strategy to ensure any sustainability / environmental impacts arising from the implementation of the plan can be identified early and mitigated against if necessary.

The Inspectors Report endorsed the indicators below to monitor the performance of policies within the urban area. These indicators will be included in future Annual Monitoring Report, with findings being used to inform the review of the Core Strategy.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Type of Indicator</th>
<th>Target</th>
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<tbody>
<tr>
<td>Number of net and annual affordable housing dwellings completed on new major developments (15 or more) in the Urban Area up to 2017</td>
<td>Local – Core Strategy</td>
<td>Not less than 30% of all dwellings as subsidised affordable housing, split between social rented (60%) and other provision (40%)</td>
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<tr>
<td>Number of net and annual additional jobs created within the Ashford Urban Area up to 2017</td>
<td>Local – Core Strategy</td>
<td>2,482 jobs to 2017</td>
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<td>Percentage of new homes in the urban area meeting the relevant Code for Sustainable Homes standard as set out in Policy CS10</td>
<td>Local – Core Strategy</td>
<td>All (on major sites)</td>
</tr>
<tr>
<td>Amount of new non-residential buildings meeting the appropriate BREEAM standard and credits set out in Policy CS10 in the urban area</td>
<td>Local – Core Strategy</td>
<td>All (on major sites)</td>
</tr>
<tr>
<td>Amount of Carbon Dioxide Emissions reduced from new major developments for: CS4 Urban Area</td>
<td>Local – Core Strategy</td>
<td>Target for 2007 - 2014 is 20%+</td>
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<tr>
<td>Amount of existing public recreation, sports, children’s play, leisure, cultural, school and adult education, youth, health, public service and community facilities lost (unless satisfactory replacement facilities are provided) and gained as a result of new development in the urban area.</td>
<td>Local – Core Strategy</td>
<td>No Net Loss</td>
</tr>
<tr>
<td>Amount of employment floorspace (B-class uses) lost in the urban area (net) (unless one of the criteria in Policy U20 applies).</td>
<td>Local – Urban Sites DPD</td>
<td>No Net Loss</td>
</tr>
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| Progress towards the following Infrastructure improvements within the Urban Area:  
  • New link road to William Harvey Hospital  
  • Warren Park and Ride  
  • A28 Chart Road Improvements  
  • SMARTLINK / Bus services  
  • A2070 Orbital Park Junction  
  • M20 Junction 10a (or alternative)  
  • Strategic Park at Conningbrook | Local – Urban Sites DPD | To be commenced in the DPD timeframe |