

**Ashford Borough Council
Chilmington Green Area Action Plan
(July 2013)**

**Sustainability Appraisal / Strategic Environmental Assessment
Adoption Statement**

Introduction

Following Examination hearings in January 2013, the Chilmington Green Area Action Plan (AAP) (Local Plan) was found sound by an Independent Planning Inspector, subject to a number of modifications. Ashford Borough Council adopted the Chilmington Green AAP on the 18th July 2013. In parallel to preparing the AAP, the Council prepared a Sustainability Appraisal (SA) which incorporated the Strategic Environmental Assessment (SEA).

Sustainability Appraisal is required by the Planning and Compulsory Purchase Act (2004) in order to ensure sustainability requirements are integrated into the Plan making process. SA's 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.

SEA is required by European Directive EC/2001/42 and is focused on the environmental consequences of implementing plans and policies. Good practice guidance advises that the requirements of SA and SEA can be met through a single process. They have been incorporated and therefore this document will refer to both as the SA.

This adoption 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 sustainability appraisals have 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.

An Appropriate Assessment Screening Report was also undertaken on the AAP as a separate document to the SA in order to determine if the AAP would adversely affect the integrity of a European site (part 6 of the Conservation of

Habitats and Species Regulations 2010 refers). The report concluded that the AAP would not have such an effect.

Section 1 - Sustainability Considerations

How environmental considerations have been integrated into the Chilmington Green AAP:

An SA scoping report for Chilmington Green was carried out in 2007. This highlighted environmental considerations which then fed through into the Sustainability Appraisal Framework, which all policies within the AAP were assessed against. More detail of the Framework and the Sustainability process for Chilmington Green is covered in section 2.

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 the vision and a set of guiding principles to deliver growth in the borough to 2021 and have been followed through to the Chilmington Green AAP.

The Core Strategy, which has been subject to its own sustainability appraisal, includes a broad vision for the Chilmington Green Urban Extension in Chapters 2 and 5. Some of these aims/objectives are listed below:

- *To be of sufficient size to have good prospects of creating a sustainable balance of homes, jobs and local services, and the quality place and living environment that comes with that;*
- *Should consist of around 5,000 to 7,000 homes centred on a strong local high street, with the vast majority of residents within 800m walking distance to the main services and public transport connections;*
- *Should 'anchor' a high quality, high frequency, public transport system;*
- *Will include usable open space and a range of local commercial, retail and community facilities within the development area, creating job opportunities and reducing the need to travel;*
- *To be a flexibly designed, mixed-use place of real character with well-defined local centres;*
- *Must incorporate high quality and innovative building design, public spaces and landscaping to create a coherent sense of place;*
- *Must be well related to the rural landscape surroundings by the creation of a well-defined edge and sensitive transition to the countryside;*
- *Must include plans for long term management and maintenance of facilities, and for the landscape and heritage protection, nature conservation, ecology, flood mitigation and sustainable drainage, public access and agricultural uses.*

The Chilmington Green AAP takes forward this strategic vision and applies it to the policy approach. With reference to the Chilmington Green evidence base, a number of overarching principles and objectives are set out throughout the AAP and the suite of policies within it. Of particular note is the evidence base documentation which has informed the AAP's policies, for example the Ecological survey data, Landscape and Visual Impact assessment and Heritage Assessment. This information has been referred to when assessing the options within the SA reports. This clearly demonstrates that environmental considerations have been an integral part of the plan preparation process for Chilmington Green and is reflected in the principles and objectives in the AAP which include:

- *Creating a legible built form which is safe and accessible, includes walkable neighbourhoods and a viable public transport network to encourage walking;*
- *Each phase to be sustainable in its own right;*
- *A mix and range of house types and varying densities;*
- *Create coherent, distinctive and attractive series of places throughout the development that are linked by footpaths and cycleways;*
- *Non-residential land uses to support job creation;*
- *Integrated and connected multi-functional network of green spaces, including part of Discovery Park to create recreational and sporting facilities and encourage walking and cycling. These will also act as linkages for ecology and wildlife;*
- *To positively respond to distinctive landscape character and assets including historic buildings and landscape , views and vistas, woodland, ecological areas, hedgerows, bridleways, footpaths and archaeology;*
- *Create well designed edges to development and relate well to the countryside and existing surroundings including green connections to the surrounding woodlands;*
- *to achieve higher levels of sustainability in their designs and layouts, ensuring that sustainable design and construction is embedded into the scheme;*
- *Improve the existing transport network, provide an area for a Park & Ride and minimise impacts on the rural road network;*
- *Provide education, health and community facilities on-site;*
- *Incorporate SUDS features into streets and open spaces, re-use existing channels and design them to accommodate wildlife;*
- *Provide appropriate protection and mitigation for locally important ecological networks and semi-natural habitats;*
- *Produce a Quality Agreement, and follow site wide design codes and character area design codes to ensure high quality design is at the heart of all design, incorporating the Building for Life Process.*

The Sustainability Appraisal has contributed to the development principles (Policy CG1) of the Chilmington Green AAP by assessing the predicted effects of the AAP proposals against sustainability criteria in relation to sustainable development. The appraisals have been transparent have referred to the available environmental data and have been prepared in consultation with environmental bodies throughout the AAP's evolution.

Section 2 - Sustainability Appraisals

How the Sustainability Appraisals have been taken into account in preparing the AAP:

The SA process began with the preparation and consultation on a Combined Scoping Report which was prepared for the Chilmington Green Area Action Plan, Urban Sites and Infrastructure DPD, 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 Chilmington AAP 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 sought from all neighbouring authorities, as well as key relevant social and economic agencies, such as the Learning and Skills Council, Ashford Primary Care Trust, Southern Water, and the Housing Corporation.

The Sustainability Appraisal Framework was set out within this 2007 Scoping Report. In order to facilitate legibility and ease of use, the Framework used sustainability objectives and criteria arranged according to themes set out in a matrix, as the basis for assessing the AAP. The draft objectives of Chilmington Green AAP were tested against the Sustainability Appraisal Objective to ensure compatibility. This task was consulted on with the environmental bodies as part of the Scoping Report.

An Addendum to the 2007 SA Combined Scoping Report was produced in July 2010 which better reflected the sustainability issues relevant to Chilmington Green and included updated baseline information and an updated SA framework. This ensured the AAP options were assessed in accordance with the relevant sustainability issues and most appropriate framework.

This report was updated again in November 2010 to incorporate comments from statutory consultees. In updating the SA Framework in the SA addendum report it was found that a number of Sustainability Appraisal Objectives were already covered by Core Strategy policies and could be removed. This resulted in a revised set of 16 SA Objectives set under 5 themes which were more specific to the Chilmington Green context and were assessed against the requirements of the SEA Directive and SA.

These five themes ensured a broad scope for sustainability considerations:

- Protection of the Environment and Adapting to Climate Change
- Social Progress

- Prudent use of Natural Resources
- Sustainable Economic Growth
- Sustainable Transport & Connectivity

The full table of 16 SA Framework Objectives can be found at Appendix 1.

A Stage 1 Report (Strategic Framework) (August 2010) was finalised by JTP (The planning consultants preparing the Chilmington Green Masterplan on behalf of the developers). Whilst not a formal part of the SA process this report summarised and updated the available baseline evidence for the AAP on the following topics:

- Transport and Movement
- Land Availability
- Landscape and Visual Impact Assessment
- Ecology
- Cultural Heritage and archaeology
- Utilities Drainage Study
- Renewable Energy Study

In September 2010 the Council produced a Sustainability Report on the Assessment of Reasonable Alternatives. This report demonstrated how the AAP options were developed and assessed from the outset and is the initial SA of the masterplan options. This report forms a section of PART B of the SA process and it summarised the emerging preferred options, highlighted where further work or evidence was required, and assessed the potential and temporal impacts of the options over the short, medium and longer term. This included temporary, cumulative and secondary or indirect effects. More information about this part of the SA can be found in section 4 of this statement.

In March 2012 the council produced the SA (Stage C) report that was published alongside the Publication Version of the Chilmington Green AAP for 6 weeks consultation. This report gives details of the previous stages of SA and includes the complete SA Framework Objectives and the questions used to assess them. The AAP does not contain any spatial objectives, so the SA was unable to assess these. However, each draft AAP policy was assessed using the framework and this report details the results of these assessments.

In summary, the Sustainability Appraisal, which formed the basis of the Environmental Report, has been fully integrated into the plan production stages and steered the objectives and policies of the final AAP. The SA has ensured that the AAP is aligned with the sustainability objectives and principles of the SA Framework and of the Core Strategy. At various stages the SA has highlighted key environmental concerns and considerations and then concluded with recommendations to enhance policies and set out where mitigation and monitoring was appropriate. Examples of this include the ecological mitigation areas identified, an ecology policy (Policy CG21) and the monitoring requirements for the ecological enhancement and mitigation strategy identified in the final AAP

Section 3 - Public Consultation

How opinions expressed through public consultation have been taken into account:

The Chilmington Green AAP has been the subject of a number of informal and formal stages of consultation throughout its evolution. The pre-submission consultation (Regulation 22) statement is a background document to the AAP that was produced in October 2012. The statement details all the public consultation stages and events, informal and formal, that took place throughout the Core Strategy stages and AAP preparation from 2004 to 2013. The consultations have enabled recommendations to be made as to how the sustainability of the plan might be improved prior to submission to the Secretary of State. The main stages of consultation are summarised in this section.

The 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. 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
- 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.

Consultation on Issues and Options

The Issues and Options Report consultation took place between 28th September and 2nd November 2007. The report was not subject to a formal public consultation, but was sent to a number of key stakeholders already involved in the Chilmington consultation process, including 52 local residents, Natural England, Environment Agency, Southern Water, local councillors, the PCT and Kent Wildlife Trust¹. The council received 38 responses to this consultation.²

¹ A full list of the consultees can be found at Appendix 3.1 of the Pre- submission Consultation Statement (a background document to the AAP)

² A summary of the responses and the Council's views on them can be found at Appendix 3.2 of the above document.

Stakeholder Consultations

The SA: Consideration of Reasonable Alternatives (September 2010) helped define the options that were considered at a community planning weekend in September 2010. This included a school workshop, a bus tour, questionnaires and themed workshops.

In November 2011 a Stakeholder workshop was held by the Chilmington Green Developers Group and around 60 delegates attended to review the key issues identified in the emerging plans for the AAP. The following topics were presented and reviewed:

- Transport and Movement
- Placemaking
- Greenspace
- Community development
- Phasing and Timing

This workshop demonstrated a high degree of stakeholder support but also identified a number of topics and areas that needed to be addressed³.

Consultation on Publication version

The Regulation 19 'Publication' version of the Chilmington Green Area Action Plan went out for public consultation from 16th April and 11th June 2012. 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 Chilmington Green AAP was consulted on alongside the Publication Version.

The Council also held three public exhibitions to advertise the consultation throughout May 2012. These were held in three locations around the AAP boundary area at venues in Kingsnorth, Shadoxhurst and Singleton. These were advertised on the Councils website and in the local press.

The exhibitions were carried out in easily accessible places, which enabled people 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 in the evenings where it was felt that this would capture the largest audience.

To advertise the exhibitions and the public consultation, approximately 10,000 leaflets were delivered to local residents, Parish Councils and left in key

³ See Page 10 of the final SA (March 2012) and Sections 2 & 4 of the Pre-submission Consultation Statement for more information on the stakeholder consultations.

community areas (i.e GP surgeries). The documents were also left in the 6 deposit points across the borough in the Civic Centre, Ashford Gateway, Tenterden Gateway, Charing Library, Wye Library and Singleton Environment Centre.

The Council received a total of 541 representations to this consultation. Full details of this consultation including comments received and the council's response to them can be viewed in the Pre-submission consultation statement Appendices 4.1 and 4.2.

Consultation on Submission version

The Council formally submitted the 'Submission Version' of the Chilmington Green AAP on 26th October 2012, triggering the formal Examination process. At this time the AAP and all background documents, including the SA/SEA were available to view on the council's website. The formal hearing sessions took place between 22 January and 23 January 2013.

Post Examination Changes to the AAP

Following the conclusion of the Public Examination hearing sessions into the soundness of the AAP, the Inspector concluded that some 'main modifications' would be necessary in order for the AAP to be found 'sound' and proposed amendments to the AAP. The council also proposed a number of 'additional' (minor) amendments to the AAP. Both sets of modifications went out for public consultation in March 2013 for six weeks.

The 'main' and 'additional' modifications had no impact on the strategic development requirements or the key principles and objectives of the AAP. There were no spatial implications or changes to the built footprint, no changes to the housing or employment scales, and no impact on wider placemaking objectives such as education, recreation, community, health, greenspace, transport plans etc. Therefore no re-assessment of the plans objectives was needed and no addendum to the SA was required.

The Inspector and the council reviewed the responses received to the public consultation on the 'main modifications' and the council made some further changes which were sent to the Inspector. The Inspector then issued his report which recommended that the AAP is sound if the modifications were made. The full list of modifications to the AAP can be found at Appendix 2.

The Council adopted the Chilmington Green AAP on the 18th July 2013. The final Sustainability Appraisal documents were published alongside the adopted AAP.

Section 4 – Assessment of Reasonable Alternatives

The reasons for choosing the Chilmington Green AAP as adopted, in light of the other reasonable alternatives:

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.

Core Strategy SA

The principle of the Chilmington Green Urban Extension was established in the Core Strategy 2008, which was subject to its own SA. This SA, completed in 2006, details the process and any assessments undertaken on the option of the Chilmington Green Urban Extension, including the reasonable alternatives of other locations⁴.

During consultation on the Core Strategy Preferred Options, Over 1,500 responses were received. As a consequence of the high number of representations the Council reviewed these submissions and developed a number of further options to address the main issues raised. As a result of this further masterplanning work and the consultation, the Core Strategy Preferred Options were amended in preparation for the Core Strategy submission document. One of the significant changes was to the development proposals at Great Chart/Chilmington which removed land to the west of the A28 at GreatChart⁵.

Chilmington AAP SA

In September 2010, the council produced the Assessment of Reasonable Alternatives report that specifically covered the consideration of options and assessment of reasonable alternatives to proposed objectives and plans within the Chilmington AAP.

This report assessed the various options developed against the SA Framework themes and topics and indicated which options were the most sustainable so the emerging preferred options could be tested further, and to define the options that were to be considered at a community planning weekend in September 2010.

The following topics were covered:

1. Walkable Neighbourhoods (4 options)
2. AAP Footprint (4 options)
3. A28 Access Road (4 Options)
4. High street (4 options)
5. SMARTLINK (3 Options)

⁴ See Core Strategy Sustainability Appraisal 2006, See Chapter 4 - Appraisal of the Strategic Growth Model and Appendix C2: Options Appraisal

⁵ See Core Strategy Sustainability Appraisal 2006, Paragraph 9.4, for details of the changes to the Chilmington Green proposals.

6. Secondary School Location (3 options)
7. Park & Ride location (4 options)

This report also looked at possible positive, negative and cumulative effects of the proposals and drew on all the available evidence. The selected options were assessed as likely to have a positive effect on the SA objectives and therefore the SA findings contributed to the development of the final policies taken forward in the AAP, along with consultation responses and other evidence.

The adopted AAP delivers a sustainable approach to development in Chilmington Green and is supported by a comprehensive SA which has ensured that the policies and plans within the AAP represent the most sustainable options for development, and has influenced the final structure of the plan by appraising the AAP objectives and options resulting in a range of policies.

The adopted AAP is consistent with the overall development targets, planning objectives and broad planning policy guidance for the urban extensions as set out within the Core Strategy. The vision set out within the Chilmington Green AAP takes forward the principles established which were subject to their own SA at Core Strategy production stage.

The AAP objectives were tested against the Sustainability Appraisal Framework in the March 2012 SA to ensure that the predicted effects of implementing the policies would have a positive effect on the sustainability of the development and would be the most suitable in light of the reasonable alternatives considered.

Section 5 - Monitoring Sustainability Effects

The measures that are to be taken to monitor the significant environmental effects of the implementation of the Chilmington Green AAP:

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

The initial table of monitoring indicators shown in the SA (March 2012) has been slightly amended since the publication version to take into account comments received during the consultation period. These changes had no impact on the SA criteria or objectives of the AAP.

The period of review of the AAP was also amended from 7 years to between 5 and 7 years to enable any review to coincide with the end of a development phase, and therefore assess if the phase has been sustainable in its own right and met the plan objectives.

An ecological enhancement and mitigation strategy will also be agreed with the council prior to the approval of planning permission. This strategy will set out long-term ecological monitoring procedures for the site that will be undertaken by the developers in consultation with Kent Wildlife Trust.

The Inspectors Report endorsed these final indicators below to monitor the performance of policies within the AAP area. The results of these indicators will be included in future Authority Monitoring Reports, with findings being used to inform any review of the AAP or Borough Local Plan.

Indicator	Target
Number of net additional dwellings completed at Chilmington Green	5,750 dwellings
Number of additional jobs created at Chilmington Green	1,000 jobs
Total number of new affordable dwellings delivered at Chilmington Green	1,725 dwellings

Indicator	Target
Percentage of new homes to meet relevant Code for Sustainable Homes standards as established through Policy CS10 (Core Strategy) and supported through the Sustainable Design and Construction SPD	100%
Percentage of new buildings to meet relevant BREEAM standards as established through Policy CS10 (Core Strategy) and supported through the Sustainable Design and Construction SPD	100%
Percentage of Carbon Dioxide Emissions (regulated) reduced from: 1) residential development 2) non-residential development	At least 15% At least 10%
Percentage of new development to meet the relevant maximum run off rates as established through Policy CS20 (Core Strategy) and the Sustainable Drainage SPD	100%
Additional amount of public open space delivered at Chilmington Green: Informal / Natural Green Space Equipped play space Outdoor sports space Allotment provision Strategic Parks	Ongoing provision leading to: At least 27.6 ha At least 6.9 ha At least 22.08 ha At least 2.76 ha At least 4.41 ha
Amount of indoor sports / community provision delivered at Chilmington Green: Com/Leisure building at District Centre Community space at cricket pitch Community space at Local Centres Indoor sports building at Discovery Park	2 badminton courts (or equivalent) 250 (GIA) sqm 500 (GIA) sqm at each Local Centre 4 badminton courts (or equivalent), 500 GIA sqm of community space & associated uses

Indicator	Target
<p>Amount of retail/ employment space provided at the District Centre:</p> <p>Supermarket General A1 – A5 B1 uses</p>	<p>3,100 sqm (Gross) 4,595 sqm (Gross) 6,910 sqm (GIA)</p>
<p>Amount of retail/ employment space provided at Local Centres (combined totals):</p> <p>General A1 – A5 B1 uses</p>	<p>850 sqm (Gross) 1,700 sqm (GIA)</p>
<p>Education provision at Chilmington Green:</p> <p>Primary school 1 Primary school 2 Primary school 3 Primary school 4 Secondary school</p>	<p>Sites transferred:</p> <p>On commencement of development By completion of 1,050th unit By completion of 2,800th unit By completion of 4,550th unit Within phase 2</p>
<p>Public transport</p>	<p>20% of modal share to be monitored every 3rd year</p>
<p>Percent of development to meet the council's adopted minimum Residential Space & Layout standards, including 'Building for Life'</p>	<p>100%</p>

Appendix 1 – Sustainability Appraisal Framework

SUSTAINABILITY APPRAISAL THEME
THEME: PROTECTION OF THE ENVIRONMENT & ADAPTING TO CLIMATE CHANGE
<p>1. Biodiversity, Geology and Green infrastructure</p> <p>SA Objective: <i>To protect and enhance the existing biodiversity and geology whilst also developing new green infrastructure to benefit the local community.</i></p>
<p>2. Landscape</p> <p>SA Objective: <i>To ensure that development responds appropriately to landscape character, quality and topography.</i></p>
<p>3. Cultural Heritage & Archaeology</p> <p>SA Objective: <i>Conserve and enhance cultural heritage and archaeological importance and listed buildings.</i></p>
<p>4. Air quality and the causes of climate change</p> <p>SA Objective: <i>To help improve air quality and help reduce the impact of climate change through reduced emissions and sustainable forms of development.</i></p>
<p>5. Flood risk</p> <p>SA Objective: <i>To reduce the risk and vulnerability of flooding and protect the capacity and integrity of flood storage areas.</i></p>
THEME: SOCIAL PROGRESS
<p>6. Housing and affordable housing</p> <p>SA Objective: <i>To ensure the delivery of good quality, sustainably constructed home that meet the needs and requirements of a variety of people.</i></p>
<p>7. Quality of Life, Access to Services and Social inclusion</p>

SA Objective: *To ensure that all groups of the population have access to the education, health, leisure and recreational services required in terms of provision standards, to help increase social inclusion and encourage healthy lifestyles.*

8. Distinctive Places:

SA Objective: *To promote thriving mixed-use development of a high design quality, with a 'sense of place'.*

THEME: PRUDENT USE OF NATURAL RESOURCES

9. Water

SA Objective: *To protect and enhance the quality of ground and surface water.*

10. Land use

SA Objective: *To make the most efficient and appropriate use of land, and previously developed buildings*

11. Renewable Resources

SA Objective: *To encourage the use of local renewable resources and the provision of sustainable energy.*

12. Waste

SA Objective: *To reduce waste generation and disposal, and achieve the sustainable management of waste.*

THEME: SUSTAINABLE ECONOMIC GROWTH

13. Balanced Growth & Diversity

SA Objective: *To achieve a balance between employment and housing growth and promote economic diversity and sustainable growth.*

14. Employment

SA Objective: *To generate a range of new jobs in accessible locations.*

THEME: SUSTAINABLE TRANSPORT & CONNECTIVITY

15. Sustainable Travel

SA Objective: *To facilitate modal shift to more sustainable transport and improve access to employment, services and green space*

16. Connectivity

SA Objective: *to enhance connectivity between surrounding communities and Ashford town centre*