

Appendix 1 – Scoping Report

Ashford Borough Council Local Plan 2030

**Sustainability Appraisal (SA) Scoping Report
for the Local Plan**

September 2014

Ashford Borough Council

Planning and Development Department

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1.0 Introduction

1.1 Purpose of this document

- 1.1.1 This Sustainability Appraisal (SA) Scoping Report is the first part (Stage A) of the SA process for Ashford Borough Council's Local Plan to 2030 (previously known as Core Strategy Review). The Local Plan, when adopted, will replace the Core Strategy and is expected to be adopted by the end of 2014.
- 1.1.2 The Local Plan will determine how the most sustainable and deliverable pattern of growth can be achieved within the borough. Key policies in the Local Plan will concern the quantum of new housing and jobs within the borough and the broad locations for housing and employment land. It will also include policies on transport, retail, tourism, open space, ecology/ biodiversity and water resources, community needs and infrastructure requirements.
- 1.1.3 SA is a statutory requirement for Local Plans. The SA process is designed to test a policy document for soundness through the use of social, economic and environmental criteria. To make meaningful progress towards a more sustainable way of living, it is essential that plans are developed in an integrated way where sustainability issues are considered from the outset. The Sustainability Appraisal process provides a mechanism through which these considerations can influence the development of plans, with the aim of reconciling and balancing their environmental, social and economic effects. It also suggests ways of avoiding or reducing any adverse impacts arising from the plan, as well as ways of maximising its positive impacts.
- 1.1.4 The Sustainability Appraisal process has been tailored to incorporate the requirements of the Strategic Environmental Assessment (SEA) process. The European Strategic Environmental Assessment Directive requires the use of the SEA process to ensure that plans and policies with land use implications take environmental issues into account. The process involves:
- the assessment of current state of the environment
 - the identification of likely significant effects on the environment
 - identification of possible measures to prevent or mitigate these effects.
- 1.1.5 Regulation 12(2) of the 2004 Regulations requires that the SA/ Environmental report 'shall **identify, describe and evaluate the likely significant effects on the environment of – (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme**'. Such an assessment should take account of any changes to alternatives presented during the Plan preparation process, including circumstances where previously separate alternatives had been combined.
- 1.1.6 The Sustainability Appraisal' should form an integrated part of the plan preparation process and inform the evaluation of alternatives. It should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.
- 1.1.7 Table 1 sets out the stages and tasks involved in Stage A of the SA process.

Table 1: Stage A: Stages and Tasks

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	
SEA Stages and Tasks	Purpose
Identifying other relevant plans, programmes and environmental protection objectives	<ul style="list-style-type: none"> To establish how the plan or programme is affected by outside factors, programmes and environmental to suggest ideas for how any constraints can be addressed To help identify SEA objectives.
Collecting baseline information	<ul style="list-style-type: none"> To provide an evidence base for environmental problems, prediction of effects, and monitoring To help in the development of SEA objectives.
Identifying environmental problems	<ul style="list-style-type: none"> To help focus the SEA and streamline the subsequent stages, including baseline information analysis, setting of the SEA objectives, prediction of effects and monitoring.
Developing SEA objectives	<ul style="list-style-type: none"> To provide a means by which the environmental performance of the plan or programme and alternatives can be assessed.
Consulting on the scope of SEA	<ul style="list-style-type: none"> To ensure that the SEA covers the likely significant environmental effects of the plan or programme.

1.1.8 The Regulations require that an SA Report is published for consultation alongside the draft Plan (which, in this case, will be the Local Plan to 2030). The SA Report should identify, describe and evaluate the likely significant effects of implementing the plan, and the reasonable alternatives. The Sustainability Appraisal report must then be taken into account, alongside consultation responses, when finalising the Plan.

1.1.9 The Regulations also prescribe the information that must be contained within the SA Report. **Essentially, there is a need for the final SA Report to answer the following four questions:**

- **What is the scope of the SA?**

i.e. What is the plan trying to achieve and what is the scope of the sustainability issues for which it is the role of SA to consider the likely significant effects?

- **What has the Plan-making and SA process involved up to this point?**

Prior to preparing the draft plan there must be (as a minimum) one plan-making / SA iteration at which point alternative approaches to addressing key plan issues are subjected to SA and findings taken on board by the plan-makers.

- **What are the appraisal findings at this current stage?**

i.e. what are the likely effects of the draft plan and what changes might be made to the plan in order to avoid or mitigate negative effects and enhance the positives?

- **How will the effects of the plan be monitored?**

There is a need to think about how the effects of the plan will be monitored once it is adopted and being implemented.

1.2 Structure of the Scoping Report

1.2.1 The Regulations require that, when considering the question – What is the scope of the SA? – a number of further sub-questions are answered, as set out in Table 2. These questions are used to structure the baseline information under a number of topic themes relevant to the Local Plan. Sustainability issues are identified under each theme and overall sustainability issues for the Local Plan are identified in section 3. A Sustainability Framework is also included.

Table 2: SA Scoping Questions

What's the Plan seeking to achieve?	An outline of the contents, main objectives of the plan'
What's the sustainability baseline context?	The relationship of the plan with other relevant plans and programmes The environmental protection objectives, established at international or national level, relevant to the plan
What's the sustainability 'baseline' at the current time?	The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
What's the baseline projection?	The likely evolution of the current state of the environment without implementation of the plan'
What are the key issues that should be a focus of SA?	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

Sustainability topics

1.2.2 In the Scoping Report and the SA Report, the appraisal questions will be answered in relation to a series of broad sustainability topics.

- Biodiversity
- Landscape, Cultural Heritage & Archaeology
- Climate Change Mitigation and Adaption
- Housing and Affordable Housing
- Access to Services and Social Inclusion
- Health and Wellbeing

- Design Quality
- Water Quality and Quantity
- Land Use, Geology and Soil
- Minerals and Waste
- Economic Growth, Employment and Skills
- Town and District Centre Vitality
- Sustainable Travel

1.2.3 These topics have been selected to reflect:

A broad understanding of the anticipated scope of plan effects;

- Topics suggested by the SEA Directive
- Topics that were used as the basis for structuring the 2005 Ashford Core Strategy SA Scoping Report.
- Key issues of relevance and importance to Ashford Borough

1.2.4 This version of the Scoping Report has been updated to include changes made following responses from the statutory consultees (Annex 4), and changes to the SA Framework and Objectives which were required to ensure it followed the most recent guidance and for maximum clarity and consistency.

2.0 BASELINE EVIDENCE

2.1 Overview

- 2.1.1 This section identifies baseline information on a wide range of topics, bringing together key issues from the evidence base, drawing out key trends and objectives for the borough.
- 2.1.2 For the purpose of clarity, the baseline evidence has been divided into five broad themes. Data within these themes is then subdivided into topic areas. The five SA themes are:
- Protection of the Environment and Adaption to Climate Change
 - Social Progress
 - Natural Resources and Material Assets
 - Economy and Employment
 - Sustainable Transport
- 2.1.3 From this data, SA objectives have been derived which are set out in the sustainability framework in section 3.

THEME: PROTECTION OF ENVIRONMENT AND ADAPTION TO CLIMATE CHANGE

2.2 BIODIVERSITY

What is the sustainability baseline context?

- 2.2.1 Biodiversity includes the plant and animal species that make up our wildlife, and the habitats in which they live. As well as being important in its own right, biodiversity is important because of the ecosystem and flood defence benefits it provides and its contribution to well-being and a sense of place.
- 2.2.2 The EU *Sustainable Development Strategy*, adopted in 2006 includes targets to halt the loss of biodiversity. The UK is also a Party to the Convention on Biological Diversity (CBD), a principal objective of which is the conservation of biodiversity. Commitment to the CBD led to the preparation of the 1994 UK Biodiversity Action Plan (UK BAP), the overall goal of which is to conserve and enhance biodiversity within the UK and to contribute to efforts to conserve global biodiversity. The UK BAP identifies the most threatened biodiversity assets and includes action plans for the recovery of priority species and habitats. More recently at the European level, a new EU Biodiversity Strategy was adopted in May 2011 in order to deliver on the established Europe-wide target to halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020.
- 2.2.3 Within the UK, the *Natural Environment and Rural Communities Act 2006* placed a Duty on public authorities to have regard to the conservation of biodiversity in exercising their functions. The Duty aims to raise the profile and visibility of biodiversity, clarify existing commitments with regard to biodiversity, and to make a natural and integral part of policy and decision-making.
- 2.2.4 *The Natural Choice*, the first Natural Environment White Paper for 20 years, was published in 2011. It outlines the Government's vision for the natural environment, shifting the emphasis from piecemeal conservation towards a more integrated landscape approach. It also sets out how to improve the assessment of the natural environment in decision-making

and unlock growth in the green economy. The White Paper also recognises that green infrastructure is one of the most effective tools to manage environmental risks such as flooding and heat waves. With respect to trees and woodlands, the White Paper includes ambitions to create more opportunities for planting woodlands; more trees in towns, cities and villages and a greater proportion of existing woodlands to be in active management in order to maximise the benefits that woodlands provide.

- 2.2.5 *Biodiversity 2020: A strategy for England's Wildlife and Ecosystem services* builds on the Natural Environment White Paper and provides a comprehensive picture of how the UK is implementing its international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade. The strategy aims to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks capable of responding to the challenges of climate change. Actions include increasing the proportion of Sites of Special Scientific Interest (SSSIs) in favourable condition, whilst retaining the protection and improvement of the natural environment as a core objective of the planning system. In relation to planning, it states that the objective should be to: *'guide development to the best locations, encourage greener design and enable development to enhance natural networks'*.
- 2.2.6 The Wildlife Trust's 'Living Landscape' initiative¹ focuses on the conservation of biodiversity over large areas of land where habitats are fragmented. A spatial approach to ecological restoration is applied with the aim of:
- Protecting and maximising the value of areas that are already rich in wildlife;
 - Expanding, buffering, and creating connections and stepping stones between these areas; and
 - Making the wider landscape more permeable to wildlife.
- 2.2.7 The TCPA suggest that the potential to develop new housing in-line with 'Garden City' principles should be considered in order to achieve the best of town and country living. The report *Creating Garden Cities and Suburbs Today*² highlights the provision of green infrastructure as a key area for action and calls for at least 40% of a new community's total area to be allocated to green space. This should consist of a network of multi-functional well-managed, high-quality green/open spaces linked to the wider countryside of a range of types (e.g. community forests, wetland areas and public parks).
- 2.2.8 Defra's report of the Independent Panel on Forestry³ calls for woodlands to be valued for the full range of ecosystem services which they can provide. It suggests that local authorities look at the cross boundary use of S106 agreements, biodiversity offsets and the community infrastructure levy as levers to produce green space schemes that make a significant difference to the landscape.
- 2.2.9 In terms of land use, the Defra report encourages local planning authorities to continue to make effective use of previously developed (brownfield) land, take into account the economic and other benefits of the best and most versatile agricultural land, and use areas of poorer quality land where large areas are needed for development. They are also encouraged to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.

¹ The Wildlife Trust (2010) A Living Landscape: play your part in nature's recovery [online] available at: <http://www.wildlifetrusts.org/alivinglandscape>

² TCPA (2012) Creating garden cities and suburbs today [online] available at: http://www.tcpa.org.uk/data/files/Creating_Garden_Cities_and_Suburbs_Today.pdf (accessed 16 Feb 2013)

³ Defra (2012) The Independent Panel on Forestry: Final report [online] available at: <http://www.defra.gov.uk/forestrypanel/reports>

2.2.10 The NPPF states that Local Plans should aim to minimise pollution and other adverse effects on the local and natural environment. Overall, the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils
- recognising the wider benefits of ecosystem services
- minimising impacts on biodiversity and providing net gains where possible
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability; remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate (paragraph 109).

2.2.11 The *South East Green Infrastructure Framework* (LUC, 2010) provides guidance to Local Authorities on how to provide the green infrastructure that was previously required by the South East Plan. According to the Framework, green infrastructure should be fully integrated into the plan-making process and considered at the earliest stages of that process. The guidance advocates setting local standards in development plans for quantitative elements (how much new provision may be needed); a qualitative component against which to measure the need for enhancement of existing facilities; and accessibility including distance thresholds.

2.2.12 In terms of greenspace, the NPPF stresses the need to ensure effective planning for high quality open spaces, sport and recreation facilities based on assessments of the existing and future needs of communities. Opportunities to improve the local open space network and create public open space as part of new developments should also be sought.

2.2.13 The Ashford Green and Blue Grid Strategy (2008) covers the green infrastructure (rivers and floodplains within the Ashford urban area) and the blue network of rivers, ditches, wetlands, ponds and lakes. It describes how this network provides valuable habitat and is essential to the hydrological function of Ashford and the Great Stour. The creation of strategic parks in Ashford is suggested at Chilmington Green and Conningbrook.

2.2.14 Local standards for green space are set out in ABC's *Green Spaces and Water Environment SPD* (2011). This sets out minimum standards for the provision of a variety of open space and seeks to secure an appropriate amount of open space and other facilities and services needed for all people; secure good quality of provision and on-going maintenance that is sustainable into the future.

What is the current baseline context?

2.2.15 In Ashford Borough there are a number of designated landscape and ecological areas (Table 3).

Table 3: Landscape Designations in Ashford Borough

Designations	Number	Name
Areas of Outstanding Natural Beauty	2	Kent Downs High Weald
National Nature Reserves	2	Hamstreet Woods Wye and Crundale Downs
Sites of Special Scientific Interest	57 SSI units	See Table 4
Local Wildlife Sites of County-wide importance	68	
Special Area of Conservation (SAC) -	1	Wye and Crundale Downs

2.2.16 Natural England have also proposed an extension to the existing Dungeness to Pett Level Special Protection Area and the designation of a new Ramsar site that will include part of the Borough at Appledore and Appledore Heath. This is referenced as Site Code UK11023, Dungeness to Pett Level. The proposed Ramsar site is a wetland that comprises a mosaic of habitats, including shingle beaches, artificial lakes, grazing marshes, intertidal sands and mudflats. It provides breeding and winter habitats for important wetland bird species, particularly wildfowl, waders and terns.

2.2.17 Natural England's condition assessment for all Sites of Special Scientific Interest (SSSI) units (April 2013) shows 57 SSSI units within Ashford Borough (Table 4). Several SSSI 'units' make up each SSSI. It can be seen that 47% of the Borough's SSSI units are classified as favourable and 44% as unfavourable.

Table 4: Condition of SSSIs units within the Ashford Borough (Source: Natural England).

Condition	Number of Sites	Location & No. of SSIO units
Favourable	27 (47%)	Wye & Crundale Downs: 13 Hatch Park: 3 Hotfield Common: 2 Park Wood, Chilham: 1 Orlestone Forest: 3 Hoads Wood: 1 Down Bank: 1 Ham Street Woods: 2 Hart Hill: 1
Unfavourable/declining	4 (7%)	Hoads Wood: 4
Unfavourable/no change	1 (2%)	Alex Farm Pastures: 1
Unfavourable/recovering	25 (44%)	Hotfield Common: 4 Hoads Wood: 1 Wye & Crundale Downs: 8 Hatch Park: 2 Park Wood, Chilham: 2 Orlestone Forest: 3 Dungeness, Romney Marsh and Rye Bay: 2 Charing Beech Hangers: 1 Ham Street Woods: 2

What is the baseline projection?

2.2.18 With appropriate management and protection, the trend for an increase in the condition of the boroughs SSSI sites could continue. However, care and action will need to be taken to ensure that the issues affecting the SSSIs which are unfavourable/ declining are identified and appropriate steps taken by the relevant bodies. The Local Plan will include overall principles for the establishment; delivery and phasing of new open space and how green spaces and areas of ecological biodiversity could be connected to green spaces and habitat in the wider area.

What are the key sustainability issues that the SA should address?

- Ensuring that development does not have a negative direct or indirect impact upon protected species and designated landscape and ecological areas. Action will need to be taken to ensure that the issues affecting the borough’s SSSIs which are in an unfavourable/ declining condition are identified.
- Providing a range of multi-functional open space (incorporating recreational, biodiversity, landscape and other functions) which meets the recreational and amenity needs of residents and is phased in line with development.

- Ensuring that new development brings forward open space and green linkages which maximise the potential to enhance Ashford's green and blue grid and connect to areas of existing habitat biodiversity and nature conservation.

2.3 LANDSCAPE, CULTURAL HERITAGE AND ARCHAEOLOGY

What is the sustainability context?

Landscape

- 2.3.1 The *European Landscape Convention*, ratified by the UK in 2006, aims to encourage public authorities to adopt policies and measures for protecting, managing and planning landscape throughout Europe.
- 2.3.2 The NPPF states that the planning system should protect and enhance valued landscapes. According to the NPPF, 'great weight' should be given to the conservation of the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONB) which have the 'highest level of protection', on a par with National Parks, in this regard. The conservation of cultural heritage and wildlife in these areas is also an 'important consideration' (paragraph 115).
- 2.3.3 In terms of achieving quality design in keeping with landscape character and the surrounding context, the Kent Design Guide (KCC, 05/06) provides criteria to achieve high standards of design. ABC use this Guide as a material consideration in planning decisions.
- 2.3.4 The northern part of Ashford Borough, including the villages of Wye, Crundale and Chilham, form part of the Kent Downs Area of Outstanding Natural Beauty. The Kent Downs AONB Management Plan 2009 – 2014 sets out the vision for the Kent Downs AONB and the key management actions. Ashford Borough contains three landscape character areas defined by the Management plan, these are: Hollingbourne Vale, Stour and East Kent Downs. Key themes of the Management Plan's vision are recognition and protection of the landscape character and quality and the role of agriculture in conserving the natural beauty.
- 2.3.5 Conservation and management of the AONB's natural resources (e.g. soil and river water) by farmers is also promoted, as well as the need for the areas' historic and cultural heritage to be protected.
- 2.3.6 The south west of the borough, including the villages of Wittersham and Rolvenden, lie within the High Weald Area of Outstanding Natural Beauty. The AONB Management Plan 2004, a 20 year strategy, sets out the objectives for the management of the AONB. These include the sustainable land management of natural resources, including geology, soil, landform and water systems, maintaining and protecting distinctive settlements and their hinterlands and managing key woodland areas.
- 2.3.6 KCC's Countryside Access Improvement Plan 2007-2017 (2007) sets out a 10 year strategy for the future management of public Rights of Way and access to public green space and focuses on ensuring that the public Rights of Way network is legible, accessible and well maintained.
- 2.3.7 Natural England's have identified National Character Areas, Ashford Borough sits in a number of these character areas, including the North Kent Plain, North Downs, Wealden Greensand, Low Weald, High Weald and Romney Marshes.

- 2.3.8 The Studio Engleback Landscape Character Study for Ashford (2005) used, as its starting point, the 14 Landscape Character types identified by the KCC/ Jacobs Babbie report on Landscape Character, and identified 58 District Landscape Types. These Landscape Types were ranked on a condition and sensitivity matrix, using categories ranging from 'conserve' to 'create'. This has created a valuable resource for managing the landscape character and drawing upon its best assets where development is proposed in order to help develop a sense of place.
- 2.3.9 In order to promote regard for the landscape and to ensure that new development makes a positive contribution, a Landscape Character Supplementary Planning Document (SPD) was adopted by Ashford Borough Council in April 2011. This sets out the landscape characterisation for the area, based on landscape character assessments undertaken by Jacobs (2009) and Studio Engleback (2005). The landscape character areas provide an assessment of sensitivity and current condition and allows development proposals to be assessed in relation to the key characteristics of that particular landscape character area.

Heritage and Archaeology

- 2.3.10 The Government's *Statement on the Historic Environment for England* (2010) sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and manage it in a way which recognises the contribution it can make to social, economic and cultural life.
- 2.3.11 Cultural and heritage assets help define and reinforce local distinctiveness and create an attractive environment which has tourism and recreational value. One of the NPPF's 12 core planning objectives is to 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations'.
- 2.3.12 The NPPF also states that local planning authorities' Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including those heritage assets that are most at risk. Heritage assets should be recognised as an irreplaceable resource that should be conserved in a manner appropriate to their significance. This should take account of the wider social, cultural, economic and environmental benefits that conservation can bring, whilst also recognising the positive contribution that new development can make to local character and distinctiveness (paragraph 126).

What is the current baseline context?

Landscape

- 2.3.13 Within Ashford Borough, there are two national 'Area of Outstanding Natural Beauty' landscape designations: High Weald and Kent Downs. There are also three Special Landscape Areas (SLA) of County importance which are important by virtue of their rarity, representativeness and variety. They have a high scenic quality and are generally unspoilt by intrusive development;
- The Greensand Ridge
 - Old Romney Shoreline
 - Eastern Low Weald
- 2.3.14 Ashford borough includes six historic parks and gardens, including Godington Park on the western boundary of Ashford town. Other parks, laid out prior to 1939 and which are

historically important, include Chilham castle, Godmersham Park, Great Maytham (Rolvenden), Hatch Park (Mersham) and Olantigh Park (Wye).

- 2.3.15 There are thirty Scheduled Ancient Monuments (SAMs) in Ashford borough, defined and protected by English Heritage as monuments of national importance. Several SAMs are medieval sites where moats form a significant aspect to the heritage interest.

Heritage & Archaeology

- 2.3.16 There are 43 conservation areas in the Borough which are designated to protect and enhance land or buildings of special conservation interest. The character of the smaller market towns and villages which surround Ashford are of particular note. The majority of Tenterden High Street and surrounding streets are within a conservation area. Biddenden is characterised by medieval and 17th century buildings which line the main street, whilst Smarden has over 100 listed buildings. Wye has several medieval buildings which were formerly used by Imperial College, and Chilham is a 15th century village with pub, church and castle set around a central village square.

- 2.3.17 There are over 3,000 listed buildings in the borough, noted for their special historical or architectural interest. Some country lanes in the borough date back to medieval, Saxon and Roman times. These are notable features within the countryside and are also important for wildlife and archaeology.

- 2.3.18 The English Heritage 'At Risk' report 2012 identifies that Ashford Borough has a total of six buildings/ structures at risk:

Buildings at risk,

- Remains of Archbishops Palace, Market Square, Charing
- Ruins of Church of St Mary, Pluckley Road, Little Chart, Ashford, Kent

Scheduled Ancient monument

- Castle Toll Saxon burgh and medieval fort, Newenden, Ashford, Kent (SAM)

Places of Worship at risk

- Church of St Mary, High Halden, Ashford, Kent
- Church of St Mary the Virgin, The Street, Great Chart, Ashford, Kent
- Church of St Mary, The Street, Westwell, Ashford, Kent.

What is the baseline projection?

- 2.3.19 The current Core Strategy includes measures to preserve and enhance local distinctiveness and heritage character as part of the approach to securing the vitality of Ashford's historic towns and villages. Without the Local Plan, development in the Borough would include the use of previously developed land where it is viable and deliverable.

- 2.3.20 However, there are now fewer remaining, viable brownfield sites within the urban area than there were ten years ago, hence without the Local Plan there would be less control over which development sites could come forward and hence the level of protection which could be afforded to areas of landscape and heritage sensitivity. The Local Plan process will include the assessment of greenfield sites, where an appropriate option for development. Impact on the landscape, existing landscape and ecological considerations, heritage and archaeology will be taken into account as part of this process. Measures towards the delivery of Ashford's green and blue grid will contribute to the quality of the landscape and improve the baseline situation.

What are the key sustainability issues which the SA should address?

- Ensuring that the most sensitive landscape areas, including the two AONBs, are protected from the impacts of development and that, in other areas, development has regard for the landscape and townscape and makes a positive contribution.
- The need to balance the necessity to conserve the historic environment with the need to change, adapt and reuse old buildings, particularly in respect of the NPPFs emphasis on enabling economic growth in rural areas.
- Protecting and conserving listed buildings on the English Heritage 'At Risk' register within the borough.

2.4 CLIMATE CHANGE MITIGATION AND ADAPTATION

What is the sustainability context?

2.4.1 The *Stern Review* (2006) suggested that, worldwide, climate change could reduce GDP by 20% unless it is actively tackled now. According to Defra's 2009 UK Climate Projections, a medium scenario of greenhouse gas emissions would mean that by 2050, for the South East, winters are likely to be warmer by around 2.2°C. In addition:

- Summers are likely to be hotter by around 2.8°C and 3.9°C by 2080
- The hottest summer days could increase by up to 3.7°C.
- Summer night time temperatures are likely to increase by 3°C.
- Winter rainfall is likely to increase by 16%.
- Summer rainfall is likely to decrease by 19% and by 22% by 2080

These findings indicate Kent's increasing vulnerability to extreme weather events, with

- More 'very hot' days (the 2003 heat wave will be considered an average temperature by the 2040s)
- More intense downpours of rain (flash flooding)
- Increased flood events (at least 8.5% of Kent's population are already at risk)
- Increased risk of coastal flooding
- Changes in storminess and high winds.

2.4.2 As a result, there is likely to be permanent changes in the natural environment which would present challenges to national prosperity and social cohesion at the local level. The Government's principal concern for sustainable development has now filtered down to local authorities and climate change mitigation is being encouraged through promoting measures to reduce greenhouse gas emissions.

2.4.3 The *Climate Change Act 2008* sets targets for greenhouse gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline. The *Code for Sustainable Homes* (CLG, 2008) sets out the national standard for sustainable design and construction of new homes. Achieving Code Level three is mandatory for all residential development.

2.4.4 The guidance document *How local authorities can reduce emissions and manage climate risk*⁴ describes planning functions as a key lever in reducing emissions and adapting

⁴ Committee on Climate Change (2012) *How local authorities can reduce emissions and manage climate risk* [online] available at:

localities to a changing climate. It states that local authorities should use these planning functions to:

- Enforce energy efficiency standards in new buildings and extensions;
- Reduce transport emissions by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport;
- Work with developers to make renewable energy projects acceptable to local communities;
- Avoid increasing the area's risk to climate change impacts by locating new development in areas of lowest flood risk;
- Plan for infrastructure, such as low-carbon district heating networks, green infrastructure and sustainable drainage systems.

2.4.5 With regard to low-carbon district heating networks, the DECC report *The Future of Heating*⁵ states that around half (46%) of the final energy consumed in the UK is used to provide heat, contributing roughly a third of the nation's greenhouse gas emissions. Renewable heat currently represents 1% of heat generation in the UK, although this is expected to grow significantly if decarbonisation targets are to be met.

2.4.6 The report *Climate Change, Justice and Vulnerability*⁶ calls for greater recognition of the social dimensions of vulnerability to climate change when considering climate adaptation policy. It notes that how significantly a person or group will be affected by an extreme weather event is determined by their exposure to the event and their vulnerability. This is described as 'Climate Disadvantage'. For instance, a variety of social factors can affect the capacity of households to prepare for, and respond to and recover from flooding. Low-income households are less able to take measures to make their property resilient to flooding and to respond to and recover from its impacts, whilst the ability to relocate is affected by wealth, as is the ability to take out insurance against flood damage.

2.4.8 The NPPF (paragraph 94 & 95) emphasises the role of planning in securing reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure. It states that Local planning authorities should:

- Plan for new development in locations and ways which reduce greenhouse gas emissions;
- Actively support energy efficiency improvements to existing buildings; and
- When setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards.
- Support community-led initiatives for renewable and low carbon energy, identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers

2.4.9 Ashford Borough Council's *Sustainable Design and Construction SPD* (April 2012) sets out the policy requirements for sustainable design and carbon reduction measures in all major developments.

http://hmccc.s3.amazonaws.com/Local%20Authorites/1584_CCC_LA%20Report_bookmarked_1b.pdf

⁵ DECC (2012) *The Future of Heating: A strategic framework for low carbon heat in the UK* [online] available at: <http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/heat/4805-future-heating-strategic-framework.pdf>

⁶ Joseph Rowntree Foundation (2011) *Climate change, justice and vulnerability* [online] available at: <http://www.jrf.org.uk/sites/files/jrf/climate-change-social-vulnerability-full.pdf>

Flood Risk

- 2.4.10 Government guidance on flood risk emphasises that although flooding cannot be wholly prevented, its impacts can be avoided and reduced through good planning and management. As a consequence of climate change, the Pitt Review into the 2007 floods emphasised that flood risk is here to stay. Flooding from all sources (fluvial, surface water, ground water, coastal and drainage sources) is expected to increase with climate change.
- 2.4.11 In *Making Space for Water* (July 2004), the Government set out a more holistic approach to managing flood and coastal erosion risks in England. The approach involves taking account of all sources of flooding, embedding flood and coastal risk management across a range of Government policies, and stresses Government's support for the concept of integrated management of urban drainage.
- 2.4.12 The *UK Climate Projections* (UKCP 2009) reaffirm that winters are likely to get wetter and more extreme weather conditions such as intense rainfall events, are likely. Existing surface water drainage systems are not designed to cope with these extreme conditions. Extensive flooding in the UK in the summer of 2007 was mostly due to surface water overwhelming traditional piped surface water drainage systems.
- 2.4.13 The *Flood and Water Management Act 2010* provides a legislative framework for a comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges and protects water supplies to the consumer. The Act requires developers to include sustainable drainage, where practicable, in new developments, built to standards which reduce flood damage and improve water quality. It also amends section 106 of the Water Industry Act 1991 to make the right to connect surface water run-off to public sewers conditional on meeting the new standards, and establishes a Sustainable Drainage Systems Approving Body in unitary or county councils. This body must approve drainage systems in new developments and re-developments before construction begins.
- 2.4.14 The *National Flood and Coastal Erosion Risk Management Strategy for England* (July 2011) provides a national framework for local communities to develop local partnerships and solutions to the flood and coastal erosion risks they face.
- 2.4.15 The NPPF (paragraphs 93 & 94) emphasises the key role of planning in meeting the challenge of climate change and flooding. It states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change over the longer term. Factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape should be taken into account. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
- 2.4.16 The NPPF is clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. It also states that Local Plans should be supported by a Strategic Flood Risk Assessment and include policies to manage flood risk. A sequential, risk-based approach to the location of development should be applied in order to steer new development to areas with the lowest probability of flooding.
- 2.4.17 The Ashford Integrated Water Management System 2006-2031 (AIWMS1) was undertaken in 2005 as part of the evidence base for the Ashford growth agenda. The study assessed what the constraints to growth could be in relation to meeting demand for potable water, the provision of wastewater infrastructure and the impact of treated effluent on receiving waters, as well as managing flood risk.

2.4.18 The study confirmed that a key constraint to planned growth is the issue of wastewater treatment and drainage and the ecological impact that any failings could have on water quality in the River Great Stour. The vision set out within the AIWMS1 was *'to ensure that the future development and expansion of Ashford leads to the protection and enhancement of the water environment both location and throughout the Stour catchment, for the benefit of people, wildlife, and our cultural heritage and landscape'*. The Strategy is implemented through a rolling programme of five-year 'Ashford Water Action Plans'. (2011-16) some of the actions include river enhancements as part of the Conningbrook Strategic Park, meeting Sustainable Drainage requirements as part of the Chilmington Green AAP and water quality improvements at a number of sewerage treatment works.

2.4.19 In terms of sustainable drainage, the Ashford Integrated Water Management Study (2005) identifies an approach for the use of sustainable drainage and sets out target run-off rates for developments in different parts of the growth area. The recommendations in the Study are included in ABC's SuDS SPD (October 2010). This states that SuDS should be used as an integrated approach to water management that contributes positively to the goals of sustainable development. Specifically, the objectives of SuDS design are to:

- Reduce downstream flooding by attenuating runoff; reducing peak run-off rate and run-off volume (if possible) preferably by replicating natural processes
- Minimise the impact of development on water quality by using drainage systems that provide treatment benefits; and in combined sewer areas, reduce the incidence of combined sewer outfall storm discharges.
- Maximising benefits by applying the SuDS "management train", comprising a series of SuDS from runoff source through to the point of discharge.
- Maximise integrated amenity, green space and biodiversity opportunities.
- Develop drainage designs that are sympathetic with the surrounding landscape character.
- Store water for potential use, for example irrigation of landscape features.
- Ensure appropriate long term ownership, management and maintenance arrangements are in place.

2.4.20 The Ashford Stage 1 Surface Water Management Plan currently in its draft form is being undertaken by KCC in consultation with a number of key partners to determine whether there are any significant local flood risks in the Borough. This forms part of KCC's new remit for strategic oversight of local flood risk conferred by the Flood and Water Management Act 2010. The SWMP identifies a range of recommended actions both generic and site specific for the reduction of flood risk. Generic actions include:

- Developing and implementing a targeted maintenance schedule
- Raising awareness of surface water management, specifically SuDs
- Improve the understanding of the natural and manmade drainage systems within the Borough.

2.4.21 The Kent Flood Management Strategy is a requirement of the Flood and Water Management Act (2010) and provides a framework for delivering local flood risk management in Kent in a coordinated way. The local strategy includes an action plan which contains a range of different actions including:

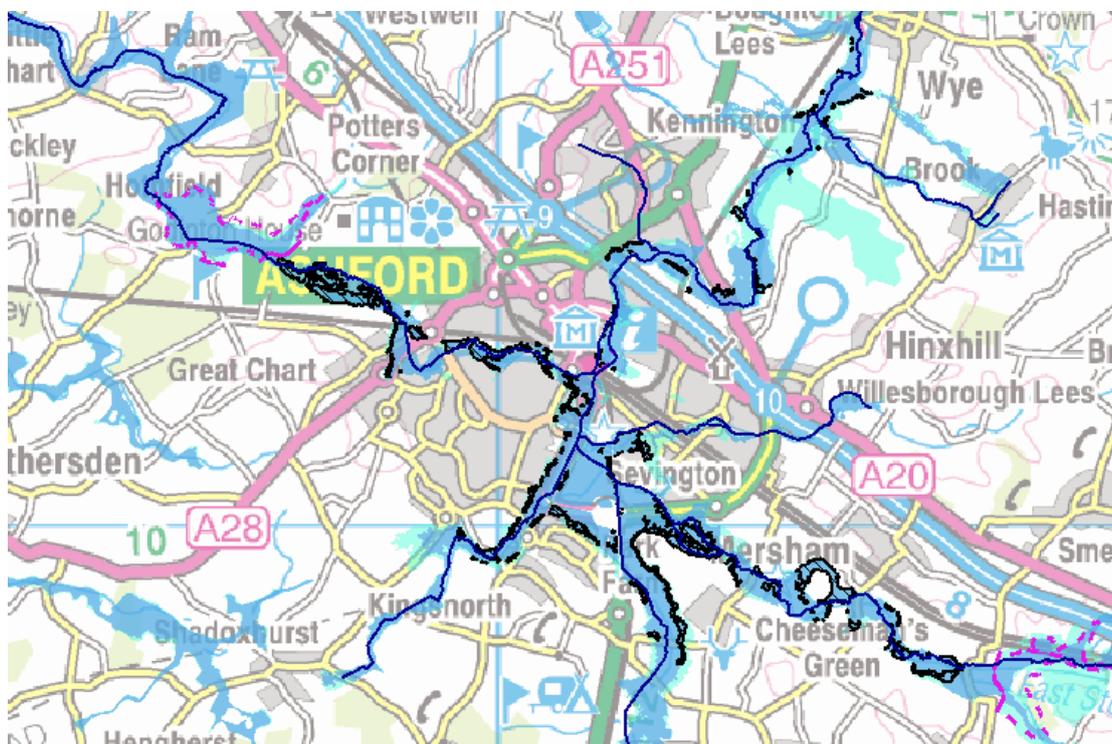
- Produce SuDs guidance to help integrate it within new developments
- Encourage the use of SuDs through policy and use in own projects
- Ensure Strategic Flood Risk Assessments consider the impact of new development on the finances of flood defences in light of the new way of allocating grant in aid for flood defences.
- Assist with flood investigation and surface water management plans where invited.

2.4.22 Catchment Flood Management Plans (CFMP) provide an overview of the flood risk across each river catchment, and recommend ways of managing that risk. Ashford Borough falls within three river catchments, and as such, flood risk management policies set out within the River Stour CFMP, Rother and Romney CFMP and the River Medway CFMP should be referred to.

What is the current baseline context?

2.4.23 Baseline information exists for assessing flood risk from fluvial and surface water sources and air quality within Ashford borough. Data also exists for sustainable energy indicators currently being monitored for the current Core Strategy. Figure 1 shows the extent of Flood Risk within Ashford town and the immediate area.

Figure 1: Flood Risk within the Ashford urban area



Dark blue: Flooding from rivers or sea without defences

Light blue: Extent of extreme flood

Pink line: Flood defences
(Not all may be shown*)

Hatched area: Areas benefiting from flood defences
(Not all may be shown*)

Blue line: Main rivers

Source: Environment Agency website, accessed 1 May 2013

2.4.24 The 2007 Environment Agency Strategic Review of Ashford identified two schemes which may be necessary as climate change progresses. These are on the East Stour at Torrington Road and on Aylesford stream in South Willesborough. A River Basin Management Plan will also be issued by the Environment Agency in June 2013. This will set out the challenges and choices available for the management of the River Stour.

What is the baseline projection?

2.4.25 Despite the emphasis on the use of renewable energy sources, housing and economic growth will lead to an increase in the consumption of energy from non-renewable sources and natural resources with their associated carbon footprints. The Local Plan will need to include policies to address the issue of climate change and mitigation, such as increasing levels of energy efficiency and the promotion of renewable energy production and consumption. As a result, improvements against the baseline may be seen.

2.4.26 Flood alleviation projects have already been identified through the Ashford Integrated Water Management Strategy and the Environment Agency’s 3D modelling for Ashford Borough and this will guide the location of new development sites within the Borough. The Local Plan will need to review development sites in accordance with the Environment Agency’s flood risk mapping, Kent County Council’s surface water flood risk mapping and the Sequential Approach set out in the NPPF. This will help ensure that new development does not increase the likelihood of flooding.

2.4.27 The amount of carbon dioxide emissions reduced from new development is currently being monitored for the Core Strategy. Table 5 shows the percentage improvement of dwelling emission rate (DER - estimated CO2 emissions as designed) over target emission rate (TER – the maximum allowable CO2 emissions) based on as built SAP/SBEM outputs (the Government approved methodology for assessing the energy performance).

Table 5: Percentage improvement of dwelling emission rate over target emission rate

	Town Centre & Brownfield Urban Sites	Urban Extensions & Greenfield Urban Sites	Tenterden and the Villages	Existing and Refurbishments
% Improvement over TER	25%	50.30%	25%	35%

What are the key sustainability issues which the SA should address?

- New development will need to be assessed appropriately in accordance with the available flood risk data in order to minimise surface water runoff and reduce the risk of flooding.
- Provision and delivery of strategic green space and open spaces as part of the strategy to minimise flood risk.
- The need to create walkable neighbourhoods and a critical mass which supports public transport and helps create modal shift.

- The delivery of sustainable buildings and the provision of on-site sustainable energy generation.
- The need to increase energy efficiency and the promotion of renewable energy production and consumption.

THEME: SOCIAL PROGRESS

2.5 HOUSING AND AFFORDABLE HOUSING

What is the sustainability context?

- 2.5.1 The Government's 2011 housing strategy 'Laying the Foundations'⁷ sets out the initiatives to be taken to boost the supply of housing. These include:
- Releasing public sector land with the capacity for up to 100,000 new homes
 - Supporting locally planned large scale development
 - Planning reforms, giving communities more control over new housing, including through the Community Right to Build
 - Financial incentives through the New Homes Bonus to allow communities to benefit from additional housing
- 2.5.2 These initiatives are within the context of the number of households in England projected to grow to 27.5 million in 2033, an increase of 5.8 million (27 per cent) over 2008, or 232,000 households per year, of which 60% is anticipated to be made up of households aged 65 years and older, and an average of only 162,000 net additions to the housing stock per year.
- 2.5.3 The 'Housing Report'⁸ collates the official figures available on housing. It states that a step change is needed to meet the nation's housing needs and aspirations, especially given that *'the external pressures on the housing market, ranging from a growing and ageing population to falling incomes, are likely to intensify over the coming years'*. The report records the following headline trends:
- A small increase in new build, but this is from a historically low base.
 - The number of completions in 2011 was 38% below the 2007 peak.
 - Overcrowding: This situation is worsening, and current measures to tackle under-occupation may not necessarily resolve the problem.
 - Homelessness: There has been a large increase in homeless acceptances and rough sleepers, with this problem potentially exacerbated by further cuts to Housing benefit during 2013.
 - Home Ownership: House prices are relatively steady, sales are up and affordability is increasing. However, homeownership rates are falling and there is a decline in low-cost ownership sales.
- 2.5.4 The NPPF is clear that local authorities should significantly boost the supply of housing. Planning authorities are required to:

⁷ CLG (2011) Laying the Foundations: A Housing Strategy for England available at: <http://www.communities.gov.uk/documents/housing/pdf/2033676.pdf>

⁸ The Chartered Institute of Housing, National Housing Federation & Shelter (2012) The Housing Report: Edition 2 available at: http://england.shelter.org.uk/_data/assets/pdf_file/0008/435653/Housing_Report_2_-_May_2012.pdf (accessed 11/2012)

- Ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, identify and update annually a supply of specific deliverable sites sufficient to provide five years of housing against their housing requirements, with an additional buffer of 5%
- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing.

2.5.6 The NPPF also states that Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. LPAs should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. It acknowledges that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities (paragraph 51)

2.5.7 Ashford Borough Council's Affordable Housing SPD (2009) states that, for affordable housing the Council will take a strategic borough-wide view of the provision of sizes and types of housing. The Council will negotiate the provision of units that correspond to the needs identified by the Housing Needs Survey, although survey figures are viewed as indicative of the affordable housing needs in any locality. In terms of integration and the creation of sustainable mixed tenure communities, the SPD states that affordable housing provision must not be visually distinguishable from the market housing on site in terms of build quality, materials, detail, levels of amenity space and privacy.

What is the current baseline context?

2.5.8 The net number of housing completions for 2011/12 was 633, of which 566 were in the Ashford urban area. Completions since 2007 have remained relatively stable, averaging at 558 per year. The total number of completions since 2001 is 6,192.

2.5.9 The Housing Needs Survey Update (2010) reports that;

- Average house prices during the third quarter of 2009 from Land Registry reveal that the average property price in Ashford was £224,225, lower than the County and Regional averages of £229,907 and £259,780 respectively.
- The average price of flat / maisonette properties according to the Land Registry data at Quarter 3 2009 was £130,051,
- Housing is technically at its most affordable than it has been for the last six years. Mortgage payments at 31% of earnings are now below the 25 year average of 37% and below the peak of 48% in July 2007.
- The house price to income ratio has declined from 5.84 in July 2007 to 4.34 in March 2009. The long term average ratio is projected at 4.0. The key problem of affordability now focuses on the availability of a large deposit rather than income levels and lending multipliers.
- Entry sales levels to the property market vary across the Borough and have risen in the majority of the sub areas when compared against the 2005 Housing Needs Survey.

- The lowest entry prices, starting at around £79,995 in the Stanhope sub area for a 1bed property, rising to £187,500 for a 2 bed flat / maisonette in the Parishes surrounding Charing. A number of the rural sub areas also had very low, if any flats for purchase.
- 2 bed terraced properties start at £119,950 in the Stanhope sub area rising to £194,950 in the Tenterden sub area.
- 3 bed terraced properties start at £115,000 in the Stanhope sub area rising to £205,000 in the Parishes surrounding the Wye sub area.
- Affordability in the private rented sector is also a particular issue in the rural areas. For example, rental costs in the private rented sector vary by location within the Borough. For a one bedroom flat in the private rented sector, cost varies from £395 per month in the Parishes surrounding Charing and Tenterden, rising to £550 in the Parishes surrounding Wye. Entry level rents for 2 bed flats range from £500 in the Parishes surrounding Charing, rising to £650 in the Tenterden and Parishes surrounding Wye.

2.5.10 The Housing Needs Survey Update (2010) included population modelling and projections. The headline data is as follows:

- The population is projected to increase by 39,700 people to 2031, across all age groups.
- There is predicted to be 21,000 (46.7%) more households in Ashford Borough in 2031 than in 2006, with the highest growth forecast in the next five year period to 2016.
- For the 0-19 age group, there will be an increase of 8,900 and a projected increase of 2,300 in the 30 - 44 age group, the main economically active and household forming and family moving group.
- The 45-64 age group shows an increase in numbers of 8,500 people, with the main increase occurring between 2006 and 2016 (+5,900). The most significant growth is in the older population group with an increase of 16,300 people (+91.6%) in the over 65 age over the forecast period. Numbers rise throughout the forecast period, with the largest rise of 4,300 occurring between 2026 and 2031.
- Numbers in the 80+ age group increase by 6,500 (127.5%) up to 2031. The greatest rise occurs after 2021 and 2026. Given the resource demands often associated with very elderly people, these are significant figures.

2.5.11 In terms of affordable housing, there will be a total annual affordable housing shortfall of 450 units on a 5 years basis and 369 units on a 10 year basis. The ratio of waiting list demand to supply is the number of years it would take for the waiting list for individual property sizes to be met through the turnover of the existing stock. Even if no future new housing need arose, it would take over:

- Six years to meet the requirements for 1 bed properties.
- Two and a half years to address the 2 bedroom requirement.
- Almost two years to address the 3 bedroom stock requirement.
- Over 8 years to meet the need for larger 4+ bedroom family units.

2.5.12 Council tax band classifications provide a good indication of the mix of housing stock by value (and therefore, generally, size) in a particular area. Ashford borough has a higher proportion of properties in Council tax band B dwelling stock within Council tax band B

(23.3%) compared to the South East (16.7%). The proportions for bands A and C are broadly similar for Ashford and the South East, although there are a lower proportion of properties in band D in Ashford (16.6%) compared to the South East (20.1%). This suggests that new development in Ashford could seek to diversify the housing mix to provide a range of property types and sizes which meet existing and future need (Source: ONS, 2011).

2.5.13 Ashford has a higher percentage of local authority owned housing stock (10.1%) compared with the South East (4.9%) in 2011, but a lower proportion of RSL dwelling stock than the South East (8.5%). Overall, there is a slightly higher percentage of LA and RSL stock in Ashford (14.2%) compared to the SE (13.4%). The proportion of owner occupied and private rented stock is also broadly similar, at 85.7% in Ashford and 86% in the SE.

What is the baseline projection?

2.5.14 Ashford's population will continue to increase due to migration and natural increase (rising birth rate and an increasing life expectancy), creating a consistent demand for a range of new housing. The Local Plan will need to take account of these demographic trends and their implications for housing numbers, mix and land allocations.

2.5.15 Given the current backlog in demand for affordable housing as well as the issue of the requirement for a large deposit for first time buyers, the need for affordable housing will continue. This is a particular issue in the borough's rural areas.

What are the key sustainability issues which the SA should address?

- The affordability of housing in Ashford remains an issue, despite the decrease in income multiples required to purchase a property. Affordability is also a particular issue in the villages and rural areas.
- Infrastructure will need to be planned and phased in accordance with new housing development. There will be a particular need for new primary and secondary schools and services for young people and older residents.
- There will be a need to provide flexibly-designed housing which is adaptable to people's changing needs and an ageing population. Policies which encourage adherence to Lifetime Homes Standards will be important.
- Affordable housing will need to meet the needs of local people, including the provision of family homes and larger units.

2.6 ACCESS TO SERVICES AND SOCIAL INCLUSION

What is the sustainability policy context?

2.6.1 Access to services and social inclusion are an important aspect of sustainable communities. Many interlinked factors can influence the extent to which individuals are able to fully participate in society. Low income, poverty and unemployment can be compounded by poor housing, crime, discrimination, bad health and family breakdown, creating a cycle which can lead to social exclusion. This section focuses on data setting out the baseline position on some of these issues, including access to services, deprivation, crime and health.

- 2.6.2 *Bold Steps for Kent* (2010) sets out how KCC will manage a significant reduction in public spending to 2014/15 whilst devolving public services to the local level. The Plan's high level aims are:
- to help the Kent economy grow by building strong relationships with key business sectors and delivering new housing and infrastructure whilst ensuring that the challenge of climate change is met;
 - to put the citizen in control so they are empowered to take responsibility for their own community and service needs
 - to tackle disadvantage by fostering aspiration rather than dependency.
- 2.6.3 Other strategies include KCC's Vision for Kent for 2011-2021, which identifies three county-wide ambitions for the next ten years which mirror the Bold Steps for Kent high level aims, and the Kent Cultural Strategy Action Plan (2012). This includes priorities to attract and retain creative businesses and protect Kent's existing strengths, including its built and natural environment.
- 2.6.4 The KCC Guide to Development Contributions and the Provision of Community Infrastructure (2009) states that the use of schools beyond their normal hours and for a wider range of services will become more common and could have an implication for landtake. The requirement for KCC services, such as youth services within Ashford will be met by a combination of facilities provided locally and from district hubs.
- 2.6.5 At the local level, the *Ashford Sustainable Community Strategy 2008 – 2018* sets out the key theme areas and clearly states what issues are important to the local community and what key objectives the Ashford Partnership intends to achieve over the next ten years. These themes are:
1. Learning for everyone
 2. Economic success - opportunities for all
 3. Improving health and well-being
 4. Promoting environmental excellence
 5. Stronger and safer communities
 6. Enjoying life
 7. Keeping Ashford moving
 8. Achieving high quality homes

What is the sustainability baseline context?

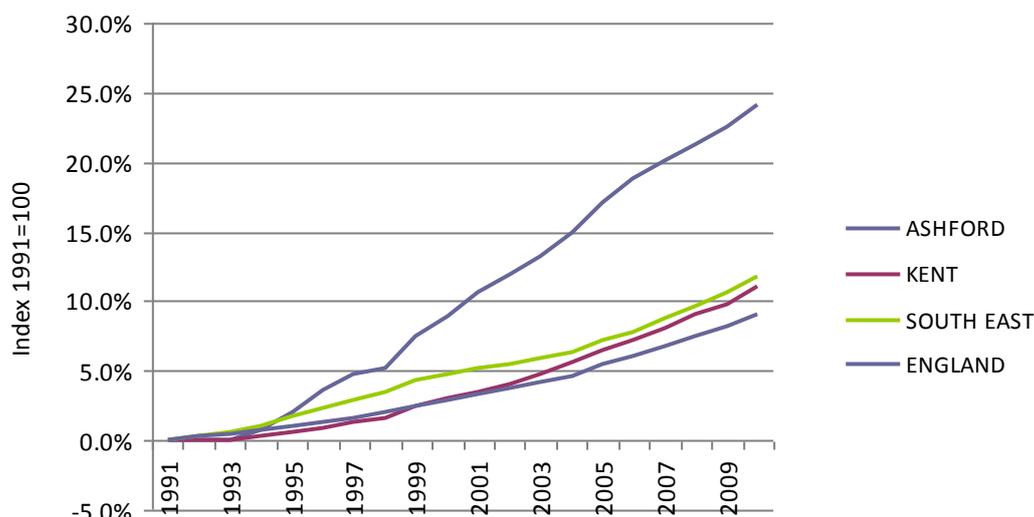
Access to Services

- 2.6.6 Services within the Ashford growth area will need to be planned and delivered in line with housing and population growth. The total population for Ashford borough is 117,939 (Census 2011). From 2007-2010, 45% of the population increase occurred through natural change, while 55% occurred through migration. This compares with 23% and 77% respectively over the previous 5 year period (2003-2007)⁹. Kent County Council also produce population forecasts that are based on housing strategy and differ to the population projections produced by ONS which are trend-based and take no account of changes in housing policy. The KCC data indicates that households in the Borough may increase by approximately

⁹ Research & Evaluation, Business Strategy & Support, Kent County Council, July 2011, available at www.kent.gov.uk/research

15,000, (13%) over the next 5 years to 2016; 40% (47,000) (165,000) by 2026, with a slight slowdown in the rate of growth by 2031 (43% - 170,100). This level of growth will make Ashford the third largest Kent district in 2026, compared with 7th in 2007. Figure 2 shows the growth in Ashford's population compared to Kent, the South East and England.

Figure 2: Population change in Ashford compared to county, region and England



Source ONS

- 2.6.7 The population change in Ashford between 1991 and 2010 has been 24.1%, compared to 11% in Kent, 11.7 % in the South East and 9.1% in England. The reason for the population change between 2001 and 2010, in terms of average annual 'flow' has been mainly due to 'flow in' from other parts of England (41.5%). International migration has accounted for 3.7% of the change and births 9.7% (ONS, 2013).
- 2.6.8 In terms of demographics, young people (under 24) equated to around 31% of the population in 2011, this proportion is expected to stay fairly contestant through to 2026. The current proportion of residents over 65 accounts for around 17% of the population, this is anticipated to incrementally increase by a further percent over the next 5 years, with this age group representing around 20% of the population by 2026, and 22% by 2031.
- 2.6.9 Kent County Council's *Commissioning Plan for Education 2012-2017* highlights that in 2011 the primary school aged population stood at 10,700, with secondary school at 7500. In the next five years this is expected to increase by 18% (1,900) and 12% (1,200) respectively. By 2026, this is anticipated to have increased by 38% (4,100) and 36% (2,700) resulting in a total of 14,800 primary age population and 10,200 secondary. Equating this to mainstream school places, 9,522 primary school pupils were enrolled in 2011, this is anticipated to increase to 10,752 by 2016; resulting in a surplus capacity of less than 1%. There were 6,343 secondary school places (year 7-11) in 2011, which is expected to increase to 7,038 by 2021, equating to an anticipated deficit in capacity of just over 3%.
- 2.6.10 The impact of the growth will also heighten the demand for adult social services. For example, the total number of older persons in Ashford is predicted to increase by 50% between 2001 and 2016, and there are significant projected changes in the 65 to 69 (+65.7%) and 85+ (+77.8%) age groups. This will mean that cross-agency service planning

will need to take into account the need for new and adapted services. Similarly it is expected that numbers of people experiencing disabling physical problems will increase due to improvements in medical and therapeutic services.

Deprivation

2.6.11 The Indices of Deprivation (2010) are useful in demonstrating the level and extent of socio-economic deprivation within the Borough. The Indices consist of one composite score (the Index of Multiple Deprivation, or IMD) and seven individual indicators or 'domains', which are Income, Employment; Education; Skills and Training; Barriers to Housing and Services; Health; Crime; and Living Environment. For each indicator, a rank of all local authorities in England is derived, with a rank of 1 being the most deprived.

2.6.12 Ashford borough's IMD rank is 198 out of 326 local authority districts in England (and therefore within the 40% least deprived boroughs in the country). This suggests that the borough as a whole has relatively low levels of deprivation, but small pockets of high deprivation¹⁰ are evident at the 'Super Output Area' level (areas which are smaller than ward level and which have a minimum population of 1,000).

2.6.13 Analysis of the IMD reveals that:

- Four Super Output Areas are within the 20% most deprived in England, according to the IMD. These SOAs are in Aylesford Green, Stanhope and Victoria wards.
- Stanhope¹¹ experiences particularly acute deprivation, being in the 10% most deprived in England for income and 1% most deprived for Education and training.
- Five wards have SOAs within the 10% most deprived for Education and Training. These are Aylesford Green, Bybrook, Norman, Stanhope and Victoria. The latter is in the 3% most deprived for Education and Training
- For Crime, Norman ward has an SOA within the 10% most deprived in England. Stanhope, Bybrook and Victoria wards have SOAs within the 20% most deprived.
- The 'Barriers to Housing and Services' domain has the highest number of SOAs in Ashford borough within the 10% and 20% most deprived compared to the other deprivation domains. This domain measures the physical and financial accessibility of housing and key local services. The indicators fall into two sub-domains: 'geographical barriers', which relate to the physical proximity of local services, and 'wider barriers' which includes issues relating to access to housing, such as affordability¹². Seven indicators are combined to calculate this domain.

¹⁰ classified as SOAs within the 10% and 20% most deprived nationally

¹¹ SOA E01024020

¹² *Sub-domain: Wider barriers*

- Household overcrowding – the proportion of households within an SOA which are judged to have insufficient space to meet the household's needs
- Homelessness – the rate of acceptances for housing assistance under the homelessness provisions of the 1996 Housing Act (at local authority district level)
- Difficulty of access to owner-occupation (local authority district level) – proportion of households aged under 35 whose income means they are unable to afford to enter owner occupation.

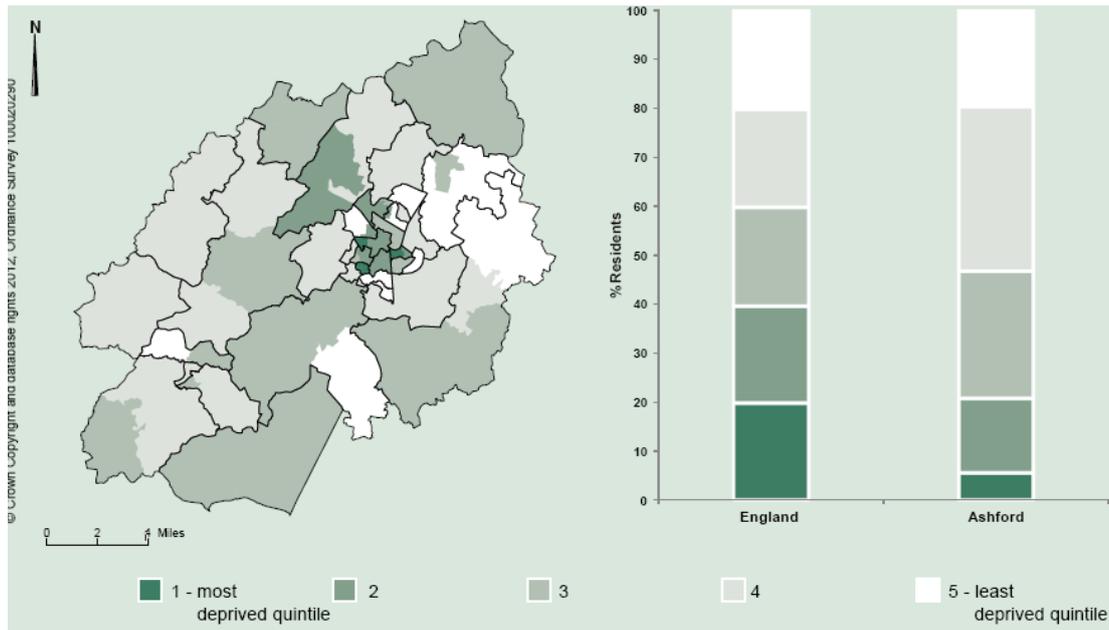
Sub-domain: Geographical barriers

Road distance to a GP surgery
Road distance to a supermarket or convenience store
Road distance to a primary school

- The 14 SOAs within the 10% most deprived areas in England against this domain are in the rural parts of the borough within the wards of Isle of Oxney, Biddenden, Bockhanger, Charing, Downs North, Downs West, North Willesbrough, Saxon Shore, Rolvenden, Weald Central and Weald North.

2.6.14 Figure 3 shows the Index of Multiple deprivation mapped for Ashford borough, based on national quintiles. The darkest coloured areas are some of the most deprived areas in England. The bar chart on the right shows the percentage of the population in England and in Ashford who live in each of these quintiles.

Figure 3: Index of Multiple deprivation: Ashford



Source: www.healthprofiles.info, Department of Health 2012

2.6.15 Table 6 summarises Ashford's performance against the IMD:

Table 6: Number of SOAs in Ashford in 10% and 20% most deprived in England

	10% most deprived	20% most deprived
IMD	0	4
Income	1	3
Employment	0	1
Health	0	1
Education and Training	9	2
Access to Housing and Services	14	11
Crime	1	4

Road distance to a Post Office.

Living Environment	0	1
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Homelessness

- 2.6.16 The Department of Health's Health Profile of Ashford (2012) identified Ashford as having a higher than average level of homelessness. 'Hidden' homelessness is a particular problem – individuals who move between temporary accommodation such as friends' houses and have no permanent home. The Census 2011 reveals that Ashford borough from April 2010 – March 2011 has a total of 194 homeless households, of which 105 are in temporary accommodation.

Crime

- 2.6.17 Table 7 shows that overall crime per 1,000 residents in Ashford for the year ending 30/9/2012 was 55.16 per 1,000, lower than the Kent Police Force average of 57.66. For the quarter ending 30/09/12, overall crime rates in Ashford were up, but down in the Kent Force area compared to the corresponding quarter in 2011. In addition, Ashford's rate for burglary was higher than the Kent average, and has increased for both Ashford and Kent. However, the rate for robbery has declined in Ashford, whilst the Kent rate has remained about the same.

Table 7: Crime Rates per 1,000 Residents (Police Recorded Crime)

	Crime Rates per 1,000 residents	
	Ashford	Kent Force Average
Overall crime	55.16	57.66
Burglary	8.03	7.39
Drug offences	1.72	2.16
Vehicle crime	5.61	5.47
Violent crime	10.41	11.56
Criminal damage and arson	8.61	10.59
Robbery	0.44	0.55

Source: ONS via www.police.uk, accessed 12/2/2013

Resident and Household Characteristics

- 2.6.18 The Census 2011 reveals that, for the 'Main Language Spoken' dataset, 95% of 'All Usual Residents Aged 3+' speak English. The next three main languages spoken are Nepalese (1.4%) and Polish (0.86%). This is indicative of the growing Nepali and Polish communities in Ashford, which may have implications for service delivery.

- 2.6.19 Ashford has a higher proportion of households who own their own home (68.4%) compared to the South East. The proportion of residents in private rented housing in Ashford (14.3%) is lower than that for the South East, where the figure is 16.3%. This may be indicative of the relatively lower house prices in Ashford compared to the remainder of the South East. However, the proportion of households in social rented housing is higher than that for the South East, at 14.5% and 13.7% respectively.
- 2.6.20 In terms of household size in Ashford, Ashford borough has a slightly higher proportion of 3, 4, 5 and 6 people households compared to the South East, but a smaller percentage of 1 person households (Table 8).

Table 8: Household Size in Ashford

Households	Percentage of Households	
	Ashford	South East
1 Person in Household	25.6	28.8
2 People in Household	36.1	35.1
3 People in Household	16.4	15.5
4 People in Household	14.6	13.9
5 People in Household	5.3	4.7
6 People in Household	1.6	1.5
7 People in Household	0.3	0.3
8 or More People in Household	0.2	0.2

What is the baseline projection?

- 2.6.21 The population of Ashford will continue to grow as a result of in migration and natural increase. In particular, there is a growing proportion of younger people. This will have an impact on the need for school places and other services, as well as an increase in older people.
- 2.6.22 Implications for service delivery in rural areas is less clear, given the current context of reducing the cost of public services. However, development in rural areas could be a way on helping to make some villages more sustainable and capable of supporting existing or new services. The roll out of broadband to rural areas could help overcome some of the issues of rural isolation, for example by facilitating the ability of residents to undertake online shopping and carry out financial transactions online.
- 2.6.23 The current trend, based on PCT data, appears to be an increase in adult obesity in Ashford. The Local Plan may be able to influence this trend through the provision of quality outdoor space and cycle and pedestrian routes.

What are the key social, economic and environmental issues?

- The ageing population and the expected increase in people with chronic and long term illnesses will have implications on the need for health services, care homes, accessible housing and other services
- Within the context of other local authorities, Ashford as a whole is not a deprived borough, but there are pockets of high deprivation particularly in the areas of Education and Training, Income, Crime and generalised deprivation (the Index of Multiple Deprivation).

- ‘Housing and Access to Services’ is an aspect where many of the rural parts of the borough score particularly low, within the 10% worst in England. Whilst a low score against this Index is not necessarily a sign of poverty, it is an indicator that the combination of high house prices and limited services could affect the sustainability of these areas, and the ability of younger people and families to remain in those areas. The combination of an ageing population and few services in rural areas may have implications for service planning in these communities to ensure that social exclusion is not exacerbated.
- Ashford has an above average level of obese adults. Planning can influence positive change in this area by ensuring that new development has as access to open space and play areas, and through the provision of safe cycle and pedestrian routes
- There is an increasing minority ethnic community, with Nepalese and Polish being the second and third most spoken languages in Ashford. This will have implications in terms of service planning and possibly for housing need if these communities have larger households.

2.7 THEME: HEALTH AND QUALITY OF LIFE

What is the sustainability policy context?

- 2.7.1 *Fair Society, Healthy Lives*¹³ (‘The Marmot Review’) investigated health inequalities in England and the actions needed to tackle them. A subsequent report provided additional evidence relating to spatial planning and health on the basis of ‘*overwhelming evidence that health and environmental inequalities are inexorably linked, and that poor environments contribute significantly to poor health and health inequalities*’. Three main policy actions are identified to ensure that the built environment promotes health and reduces inequalities, which are to:
- Integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality
 - Prioritise policies and interventions that reduce health inequalities and mitigate climate change by: improving active travel; improving good quality open and green spaces; improving the quality of food in local areas and improving the energy efficiency of housing’
 - Support locally developed and evidence-based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation.
- 2.7.2 The increasing role that local level authorities are expected to play in producing health outcomes is evident from recent Government legislation. The *Health and Social Care Act 2012* transfers responsibility for public health from the NHS to local government, giving them a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.
- 2.7.3 The Environmental Audit Committees report *Sustainable Food*¹⁴ highlights the lack of government guidance on providing communities with better access to local and sustainable

¹³ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf>

¹⁴ Environmental Audit Committee (2012) Sustainable Food [online] available at: <http://www.publications.parliament.uk/pa/cm201012/cmselect/cmenvaud/879/87902.htm>

food through Local Plans. It suggests that such guidance should encourage provisions within Local Plans that take account of such access and ensure that communities are provided with open spaces to grow their own produce’.

- 2.7.4 The *South East England Health Strategy (2008)* aims to ensure that South East England becomes the healthiest region to live in the UK by:
- improving the health and well-being of the whole population;
 - addressing the underlying causes of ill health in a sustainable way;
 - reducing the inequalities in health that exist between different geographical areas and population groups across the region.
- 2.7.5 The Strategy identifies that the South East has the third highest road transport per capita carbon dioxide emissions in England. People in the region make the lowest number of trips on foot and the second highest number of trips by car in the country; hence obesity and related issues are a significant issue, particularly in disadvantaged areas. One of the Strategy’s objectives is therefore to increase levels of physical activity both during working hours and on the journey to work.
- 2.7.6 *Living Later Life to the Full: a policy framework for later life (2009)* is KCC’s response to the challenges and opportunities posed by an ageing population. It aims to increase older people’s involvement in community life and encourage greater social interaction within and between the generations. It sets out seven key priorities for supporting older people, including those to:
- ensure communities are designed to be ‘age proof’, stronger, safer and sustainable;
 - improve transport and accessibility;
 - enable people to lead healthier lives and have better access to healthcare;
 - support people’s citizenship, learning and participation in community life.

What is the sustainability baseline context?

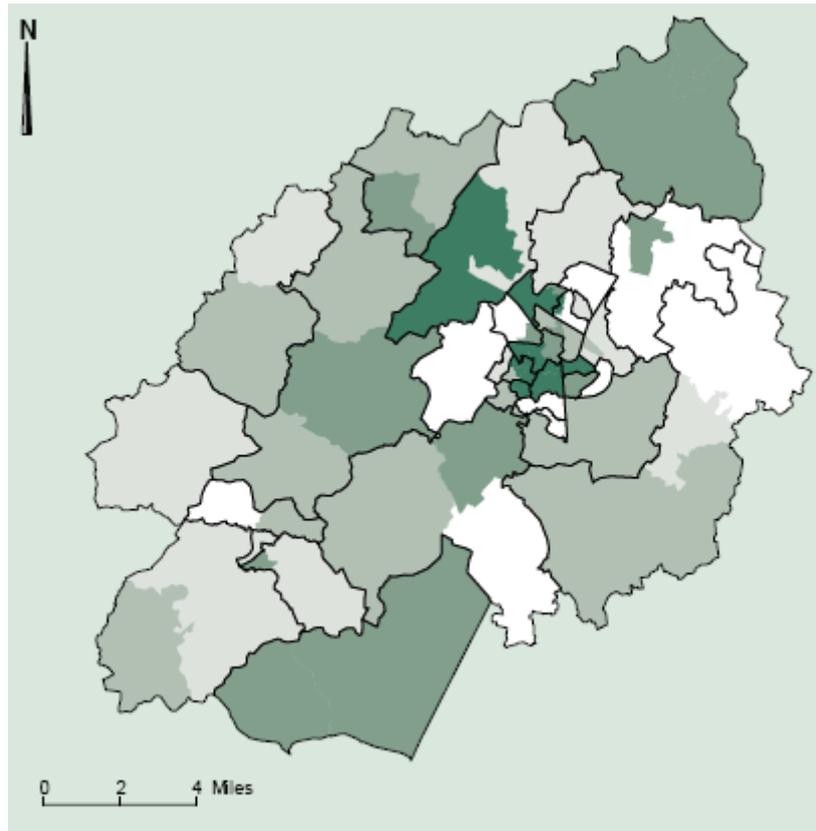
- 2.7.7 Ashford is covered by the East Kent and Coastal PCT, whose *Strategic Commissioning Plan 2010 to 2015* identifies the following trends:
- Ageing population - the over 65 population will significantly increase over the next few years with a predicted increase in the numbers of people with dementia and other long term conditions.
 - Mortality rates have been steadily declining in the last few years, but this masks underlying inequalities and variation in life expectancy with people in the most affluent areas expected to live five years longer than those in the most deprived areas.
 - The youth population is predicted to increase, with associated concerns regarding teenage pregnancy rates, drug and alcohol misuse and obesity.
 - Cardiovascular disease (CVD) is one of the main causes of death with a predicted increase in numbers of people with CVD in the next 10 years.
 - Patients want to access more local community services outside secondary care
 - Alcohol related admissions are increasing along with levels of adult obesity.

2.7.8 The 2012 Health Profile for Ashford ¹⁵ reveals that:

- The health of people in Ashford is mixed compared with the England average. Deprivation is lower than average, however about 4,100 children live in poverty.
- Life expectancy for both men (81.2) and women (83.7) in Ashford is higher than the England average (78.6 and 82.6). However, life expectancy is 5.3 years lower for men in Ashford's most deprived areas than in the least deprived areas, and 3.5 years for females.
- The estimated level of adult obesity, at 27% of the adult population, is worse than the England average of 24.2% and slightly less than England's worst obesity figure of 30.7%.
- Over the last 10 years, all-cause mortality rates have fallen. Early death rates from cancer, heart disease and stroke have fallen and are better than the England average.
- About 18.6% of Year 6 children are classified as obese. Levels of breast feeding initiation and smoking in pregnancy are worse than the England average.
- Rates of sexually transmitted infections, smoking related deaths and hospital stays for alcohol related harm are better than the England average.

2.7.9 Figure 4 below shows the differences in health deprivation based on local quintiles of the index of Multiple Deprivation by Lower Super Output Area. The darkest coloured areas are the most deprived in this area.

Figure 4: Health Deprivation in Ashford



Source: Ashford Health Profile 2012, available at www.healthprofiles.info

2.7.10 Census 2011 data reveals that slightly fewer Ashford residents classified their health as ‘very good’ (47.6%) compared to the South East (49%). Furthermore, 7.1% of residents stated that their day-to-day activities were ‘limited a lot’ (7.1%) compared to 6.7% for the South East. See Annex 1.

What is the baseline projection?

- Overall, mortality rates have fallen, with early death rates from diseases including cancer, heart disease and stroke being better than the England average. However, obesity in Ashford is a problem, and is one of the highest rates in England for the adult population. This trend may take time to reverse. However, the provision of quality green spaces close to new housing, as well as cycle and pedestrian paths, may help encourage healthy lifestyle choices
- There remains a significant gap in life expectancy between the wealthiest and most deprived parts of the borough, which planning interventions can aim to address.

What are the key sustainability issues which the SA should address?

- Encouraging healthy lifestyle choices, which can help reduce adult obesity in Ashford borough, through the provision of quality recreational space and cycle and pedestrian links

- Addressing area-based deprivation, which can have a significant impact on health.

2.8 THEME: DESIGN QUALITY

2.8.1 It is recognised in planning policy and Best Practice design guides that good urban design of buildings and spaces produces economic, social and environmental value. Design is a cross-cutting issue that, done well, can have a positive impact on health, fear of crime and community safety and general well-being. It can also positively influence the overall appeal and desirability of an area.

2.8.2 Currently, the urban design guidance produced by Cabe is under review as part of the Government's initiative to streamline the planning system. Such documents include the Plan Making Manual (2009) and Preparing Design Codes: A Practice Manual (2006). However, the Cabe publication 'the Value of Good design' makes the benefits of good design clear by stating that it;

- Produces high returns on investments, placing developments above local competition at little cost
- helps to deliver more lettable area
- reduces management, maintenance, energy and security costs
- contributes to more contented and productive workforces
- supports the 'life giving' mixed-use elements in developments
- creates an urban regeneration and place marketing dividend
- differentiates places and raising their prestige
- raises confidence in development opportunities and attracting grant monies
- reduces the cost to the public purse of rectifying urban design mistakes.

And good design adds social and environmental value by;

- creating well connected, inclusive and accessible new places
- delivering mixed-use environments with a broad range of facilities and amenities available to all
- delivering development sensitive to its context
- enhancing the sense of safety and security within and beyond developments
- returning inaccessible or run down areas and amenities to beneficial public use
- boosting civic pride and enhancing civic image
- creating more energy efficient and less polluting development
- revitalising urban heritage.

2.8.3 The NPPF stresses that well-designed buildings and places can improve the lives of people and communities. A core planning principle is to always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

2.8.4 Building for Life 12 is based on the new National Planning Policy Framework and is considered the industry standard for well-designed homes and neighbourhoods. Local communities, local authorities and developers are encouraged to use it to stimulate conversations about creating good places to live. It has 12 questions which aim to reflect the vision of what new housing developments should be: attractive, functional and sustainable places. It is designed to help local planning authorities assess the quality of proposed and completed developments; and as a point of reference in the preparation of local design policies.

2.8.5 The TCPA's 2012 publication '*Re-imagining Garden Cities for the 21st Century*' states that new, comprehensively planned sustainable communities have a powerful contribution to make to Britain's future by delivering housing and creating jobs. New communities also offer

an opportunity to put in place new governance structures that put people at the heart of developing new communities. Crucially, a strong vision of high quality and sustainability is seen as essential in delivering places that stand the test of time. A holistic, comprehensive masterplan with the flexibility to adapt to change is a fundamental requirement for a successful new community.

- 2.8.6 Good design, in terms of residential space standards and the road and open space layout of new housing developments, is a priority for Ashford Borough Council, as reflected in the adopted Residential Space Standards SPD and Residential Parking SPD.

What is the baseline context?

- 2.8.7 The Authority's Annual Monitoring Report for 2012 records the number of new residential properties granted planning permission per year which do and do not comply with the standards set out in the Residential Space and Layout SPD. For 2011/12, from a total of 14 applications for new homes, 7 met both Essential and Advocated Minimum Standards, and 6 failed the standards. Monitoring against this indicator will continue.

What is the baseline projection?

- 2.8.8 Good design, and the expectation of it from the Council's planning staff and Elected Members, is well embedded in Ashford Borough Council's planning policies and in the skills of planning officers.. On this basis, the quality of design achieved in Ashford should continue to rise and be considered as an essential element of every scheme. The Planning Department's use of a Design Review Panel will also help ensure that masterplans for large development sites are scrutinised by an independent panel.

What are the key sustainability issues which the SA should address?

- Ensuring that the Local Plan includes policies aim to secure good design, particularly high quality design across large development sites which may be built over several phases by a number of different developers.
- Ensuring that the Local Plan contains policies which allow for the establishment of delivery vehicles, where appropriate, for the on-going management and maintenance of green/ open space.

THEME: NATURAL RESOURCES AND MATERIAL ASSETS

2.9 WATER QUALITY AND QUANTITY

What is the sustainability context?

- 2.9.1 The EU's *Blueprint to Safeguard Europe's Water Resources* (2012) highlights the need for Member States to reduce pressure on water resources, for instance by using green infrastructure such as wetlands, floodplains and buffer strips along water courses. This would also reduce the EU's vulnerability to floods and droughts. It also emphasises the role water efficiency can play in reducing scarcity and water stress.
- 2.9.2 Much of the policy context to the 'Water Quality' theme is the same as that set out for section 2.4 (Adapting to Climate Change and Flood Risk). Of particular note is the Water Framework

Directive (2010), which introduced a new requirement to assess the status of water underground and in rivers, lakes, estuaries and coastal areas.

- 2.9.3 The Water White Paper (2011) 16 sets out the Government's vision for a more resilient water sector. Commitments are made in the White Paper to encourage and incentivise water efficiency measures at the demand side, with an aspiration to reduce average demand to 130 litres per head, per day by 2030. The avoidance of pollution is also a consideration. The Government also consulted on a national strategy on urban diffuse pollution which focused on a number of key sources, including runoff from roads and industrial estates.
- 2.9.4 The Ashford Integrated Water Management Strategy (2005) highlighted that although local water supply resources currently meet Ashford's needs, these will need to be supplemented from new sources if the plans for Ashford's growth are to be achieved. Following on from this, the Ashford Water Cycle Strategy (2006 - 2031) aims to protect groundwater from over-abstraction and contamination through better land management and drainage, preventing high risk activities in vulnerable areas, and reduce harmful pumping from groundwater.
- 2.9.5 The Water companies (South East Water in Ashford) have a duty to plan and manage water supply for the next 25 years through their Water Management Plans. Southern Water's draft Water Resources Management Plan (dWRMP14) sets out how water supplies will be met from 2015 to 2040. It estimates the amount of water which will be required and the interventions required to meet those future needs, taking into account challenges such as the high reliance on groundwater resources, uncertainty regarding climate change impacts and operating in an area of water stress and high environmental sensitivity.
- 2.9.6 One of the plan's key objectives is to evaluate and improve ways of managing water demand. Customer metering and water efficiency education are expected to achieve lower customer demand and reduce household consumption by almost 10%. However, increases in population and non-household demands for water will still have an impact on the overall demand forecast, which shows insufficient water to meet that requirement. According to Southern Water's plan, the demand management and new water supply options within or closest to Ashford borough which could meet that need include:
- Development of a new groundwater source at Maytham Farm, near Rolvenden/Cranbrook
 - Developing two water re-use schemes at Aylesford in Kent, and Peacehaven, East Sussex between 2025 and 2030
 - Building a new reservoir at Broad Oak, Kent, by 2030 to 2035
- 2.9.7 Other initiatives include six water transfer schemes to share water with other companies, including Thames Water and Southern Water. Additional water transfers will also be developed within Southern Water's supply area.
- 2.9.8 In accordance with the NPPF, Ashford Borough Council has a duty to cooperate with neighbouring authorities on possible future water infrastructure projects such as Broad Oak reservoir (Canterbury City Council).

¹⁶ Defra (2011) Water for life (The Water White Paper) [online] available at <http://www.officialdocuments.gov.uk/document/cm82/8230/8230.pdf> (accessed 11/2012)

What is the baseline context?

2.9.9 Table 9 sets out the classifications of the water bodies in the Ashford area. The 'ecological drivers' are the elements which are leading to the current overall status. It also shows that many of Ashford's water bodies are classified as 'moderate' status¹⁷. The factors reducing their status are mostly phosphate, dissolved oxygen and ecological elements. They are predicted to remain as moderate status by 2015. The Upper Great Stour is currently at 'Bad' status with phytobenthos ecological element but with a prediction of improving to Moderate status by 2015. Where no improvement in the status is expected by 2015, ABC with our partners will work to achieve improvements in the state of waterbodies for future Water Framework Directive reporting cycles up to 2027.

Table 9: Classifications of the water bodies in the Ashford area

Water Body ID	Water Body Name	Overall Status				Ecological Driver(s)	Chemical Driver(s)
		2009	2010	2011	2012		
GB107040019660	Upper Great Stour	Bad	Poor	Poor	Poor	Phytobenthos	Lead & its compounds Nickel & its compounds
GB107040019741	Great Stour, Ashford to Wye	Moderate	Poor	Poor	Bad	Phosphate DO Fish Phytobenthos	
GB107040019642	East Stour	Moderate	Moderate	Moderate	Moderate	Phosphate Fish	
GB106040018270	Beult	Poor	Poor	Poor	Poor	Phytobenthos Phosphate (moderate) Fish (poor) Hydrology (not high) Dissolved Oxygen (moderate) Mitigation Measures Assessment (moderate)	Nickel & its compounds
GB107040019530	Cradlebridge Sewer	Moderate	Moderate	Moderate	Moderate	Dissolved Oxygen Phosphate	

¹⁷ Source: South East River Basin Management Plan published by the Environment Agency, December 2009

GB1060400 18300	Upper Beult 1	Moderate	Moderate	Poor	Poor	Phytobenthos Phosphate Mitigation Measures Assessment Hydrology (not high)	
GB1070400 13630	Newmill Channel downstream of A28	Moderate	Moderate	Poor	Poor	Ammonia (Annex 8) Phosphate Ammonia (PhysChem)	Nickel & its compounds
GB1070400 19690	Newmill Channel	Moderate	Moderate	Poor	Poor	Phosphate	
GB1060400 18280	Upper Beult 2	Moderate	Moderate	Moderate	Moderate	Phosphate Dissolved Oxygen, Mitigation Measures Hydrology (not high)	
GB1060400 18320	Sherway	Moderate	Moderate	Moderate	Moderate	Phosphate Mitigation Measures Hydrology (not high) Expert Judgement (moderate)	
GB1070400 13510	Reading Sewer between Reading Street & Cradlbridge Sewer	Moderate	Moderate	Moderate	Moderate	Dissolved Oxygen Phosphate	
GB1070400 13520	Reading Sewer between Small Hythe & Reading Street	Moderate	Moderate	Moderate	Moderate	Ammonia (Annex 8) Phosphate Ammonia (Phys-Chem)	
GB1070400 19540	Tenterden Sewer	Moderate	Moderate	Moderate	Good	Phosphate	
GB1070400 19650	Aylesford Stream	Good	Good	Good	Good	Phosphate Invertebrates	

Source: Environment Agency River Basin Management Plan, South East River Basin District December 2009; updated in May 2013 with annual monitoring data.

2.9.10 It should be noted that there is an emerging view from some bodies in the water industry that, where the cost of improving a water body is deemed to be too significant ('significant' is yet to be defined) to be economically viable, the water body should simply be monitored and financial resources spent on those water bodies where the level of improvement would have the greatest benefit.

Groundwater Quality

2.9.11 Groundwater is protected by law under the Environmental Permitting Regulations 2010. These Regulations give the Environment Agency powers to prohibit or control activities that could threaten groundwater quality; potential threats include 'development' and 'use of land' (Integrated Water Management Study, August 2005). The Environment Agency has defined Source Protection Zones for 2000 groundwater sources, such as wells, boreholes, springs used for drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity to the source, the

greater the risk. The Environment Agency has identified two 'Source Protection Zones' in the north of Ashford for which the Environment Agency will have specific comments on activities in these zones, based on their document *Groundwater Protection: Principles and Practice (GP3)*. The EA use Zones in conjunction with GP3 to set up pollution prevention measures in areas which are at higher risk, and to monitor the activities of potential polluters nearby.

2.9.12 Nearly all of Ashford's water supply is from the ground, and groundwater is also important for supplying baseflow to rivers and wetlands. Under the Water Framework Directive, groundwater is classified according to 4 quantitative and 5 chemical tests, the results of which provide the status of the various Groundwater Bodies (Water Framework Directive groundwater catchments) that fall within the Ashford area. Results issued for Ashford borough in 2009 showed an overall poor status, although it should be noted that Water Companies treat groundwater to ensure that it is fit for supply to the public. The major contributing factor is agricultural chemicals and urban run-off. The EA is working on a programme of measures to address these issues by 2027, as required by the Water Framework Directive. However, these measures cannot be delivered without working with farmers, developers and local authorities. All future development needs to consider how the potential impacts can be controlled.

2.9.13 The Code for Sustainable Homes' water theme requires that Code level 3 and 4 homes do not consume more than 105 l/p/day of water. According to the Authority Monitoring Report (2011 – 2012), the majority of new dwellings (71) meeting the Code for Sustainable Homes have reduced their household water consumption by 34% over existing levels, compared against a target of 30% by 2010.

2.9.14 In terms of current domestic water use, Ashford is above the national average of 150 litres per person per day (source – OFWAT), with 154.22 Measured Per Capita Consumption (PCC) (l/head/day). Table 10 shows South East Water's information on per capita water consumption from metered and non-metered households for zone SEW RZ8, the zone which Ashford is in (town specific information is not available).

Table 10: South East Water capita water consumption, zone RZ8

Weighted average Pcc (litres / head / day)	2009	2010	2011	2012
RZ8 (Ashford)	171.78	168.43	165.62	164.68

2.9.15 In terms of wastewater, the Ashford Integrated Water Management Study identified that the existing Bybrook Wastewater Treatment Works was the optimum location to treat wastewater for the short to medium term and, as a consequence, Southern Water Services (SWS) have invested in increased treatment capacity at this site, with a commitment for further works in the future.

What is the baseline projection?

2.9.16 Groundwater quality in Ashford is currently poor. With appropriate measures to reduce contamination from agricultural chemicals and urban run-off, ground water quality should improve. However, this issue will need to be considered for all future development, as well as how the potential impact of groundwater contamination can be controlled.

What are the sustainability issues which the SA should address?

The key issues which need to be considered are:

- Groundwater in Ashford is currently impacted by pollution in some areas. As the majority of Ashford's drinking water is sourced from the ground, improving and managing the quality of groundwater is important.
- Managing water quality is also important for supporting river and wetland ecosystems. There is a need to ensure 'no deterioration' of existing water bodies and ensure that the improvement targets to achieve 'Good' status are achieved under the Water Framework Directive. Currently, the Stour water system is at risk from water abstraction.
- The phasing and delivery of infrastructure will need to ensure that new development within the Borough has access to a reliable supply of high quality drinking water and that the required wastewater treatment and sewerage capacity infrastructure is in place to support new development.
- There is a need to minimise water use in order to preserve water supplies. Household metering is a method of achieving this.

2.10 THEME: LANDUSE AND SOIL

What is the sustainability context?

Soils and Previously Developed Land

- 2.10.1 In relation to conserving and enhancing the natural environment, the NPPF (paragraph 109) calls upon the planning system to protect and enhance soils. It should also prevent new or existing development from being adversely affected by the presence of unacceptable levels of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- 2.10.2 The NPPF calls for planning policies and decisions to encourage the effective use of land through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to define their own approach to housing density to reflect local circumstances.
- 2.10.3 *Safeguarding our Soils: A strategy for England*¹⁸ sets out a vision for the future of soils, including the condition of soils in urban areas, which are to be 'sufficiently valued for the ecosystem services they provide and given appropriate weight in the planning system'. Good quality soils in urban areas are recognised as being vital in supporting ecosystems, facilitating drainage and providing urban green spaces for communities. It also states that

¹⁸ Defra (2009) Safeguarding our Soils: A strategy for England [online] available at: <http://archive.defra.gov.uk/environment/quality/land/soil/documents/soil-strategy.pdf>

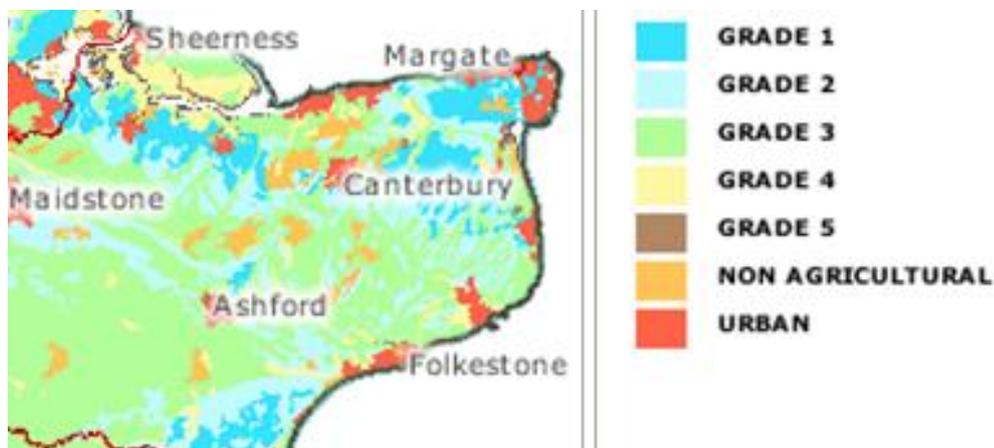
planning decisions should take sufficient account of soil quality, particularly where significant areas of the best and most versatile agricultural land are involved. Preventing the pollution of soils and addressing the historic legacy of contaminated land is another theme, noting that pressures on soils and competition for land is likely to increase in future as a result of population growth.

What is the current sustainability baseline?

Soils and Previously Developed Land

2.10.4 Natural England's maps show the grade of agricultural land in SE England. Figure 5 shows the section for East Kent and Ashford. This reveals that the majority of the borough is classified as Grade 3, with some small areas of Grade 1 and Grade 2. The mapping does not distinguish between Grade 3a and 3b; it would be the role of landowners to undertake land classification assessments on a site by site basis.

Figure 5: Land Classification for East Kent (including Ashford)



Source: www.magic.defra.gov.uk, accessed 4/3/2013

2.10.5 Much of the previously developed land in Ashford town centre is already allocated. According to Ashford Borough Council's Authority Monitoring Report, for the year 2011/12, 427 dwellings were built on previously developed (brownfield) land which equates to 67% of the borough's completions. This is a significant increase on the 2010/11's figure of 52%.

What is the baseline projection?

2.10.6 Most previously developed land in Ashford town has already been allocated for development through the existing Core Strategy and the Town Centre Area Action Plan. As such, it is likely to be necessary to allocate some greenfield sites in order to meet the NPPF's requirement for a five year supply of land. The Local Plan presents an opportunity to properly assess the merits of any sites which come forward through the Strategic Housing Land Availability Assessment (SHLAA) and the distribution of new sites across the borough.

What are the key sustainability issues which the SA should address?

- The suitability of any Greenfield sites for development, based on location and the existence of designations (landscape, cultural, heritage, etc.), proximity to transport links and services and the agricultural quality of the land.
- Achieving good design and an appropriate density of development according to site context will help to ensure that land is used efficiently.

2.11 THEME: MINERALS AND WASTE

What is the sustainability policy context?

2.11.1 In terms of waste legislation, the EU Landfill Directive applies to all countries within the European Union. The Directive is transposed into law within England through the Landfill (England and Wales) Regulations 2002. This sets out demanding targets to reduce the amount of biodegradable municipal waste sent to landfill. In England, waste disposal authorities, such as Kent County Council, have been allocated annual permits for the disposal of biodegradable municipal waste to landfill that reduce year on year to 2020.

2.11.2 The NPPF (paragraph 156) states the strategic priorities set by Local Planning Authorities should include strategic priorities for waste management. Until the National Waste Management Plan is in place, PPS 10, *Planning for Sustainable Waste Management*, remains in place. This states that all planning authorities should, to the extent appropriate to their responsibilities, prepare and deliver planning strategies that:

- help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option
- enable sufficient and timely provision of waste management facilities to meet the needs of their communities
- help secure the recovery or disposal of waste without endangering human health or harming the environment.

2.11.3 The Government *Review of Waste Policy in England*¹⁹ recognises that environmental benefits and economic growth can result from a more sustainable approach to the use of materials and sets out a vision to move to a 'zero waste economy'. The report recognises the role of planning in delivering this ambition.

2.11.4 In terms of Waste disposal, Kent County Council is the waste planning authority covering Ashford and is responsible for preparing waste strategies. *The Kent Waste Local Plan* (1998) sets a countywide strategy for waste disposal, including the identification of specific

¹⁹ Defra (2011) Government Review of Waste Policy in England [online] available at: <http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>

site opportunities for waste management and disposal facilities. The plan's objectives include the development of cleaner technologies and moving towards landfill alternatives, including Integrated Waste Management Facilities which incorporate re-use and recycling, and / or waste to energy.

2.11.5 The Kent Waste Development Framework will replace the adopted Waste Plan. It has been developed by the Kent Waste Forum, which is made up of the County Council, District and Borough Councils, the Kent Association of Parish Councils and the Environment Agency. It sets the policy and overall targets for the collection and recycling of household waste in Kent and aims to achieve

- recycling rates going up to 40% across the whole of Kent
- reducing how much waste is produced per household and hence how much of Kent's waste is put into landfill

2.11.6 Ashford Borough Council is responsible for the collection of waste from all domestic properties in the Borough of Ashford. The objectives of the Kent Joint Municipal Waste Management Strategy, 2012/13 to 2020/21, are:

- Reduce household waste arisings by at least 5% (based on 2010/11 levels); recycle/compost at least 45%; and send no more than 10% to landfill by 2015/16
- By 2020/21, reduce household waste arisings by at least 10% (based on 2010/11 levels); recycle/compost at least 50%; and send no more than 5% to landfill.

2.11.7 The current Kent target for recycling, as set out in the revised Waste Framework Directive 2008, is 45% by 2015 and 50% by 2020. As the Government has legalised the passporting of such fines to local authorities as contained in the Localism Act 2011, failure to achieve the recycling targets, may lead to fines.

2.11.8 Since 2007, the KWP has achieved its targets of a 40% recycling and composting rate across Kent (as a whole) by 2012/13 and for Kent County Council's Household Waste Recycling Centres (HWRCs) to reach a 60% recycling and composting rate. The amount of waste sent to landfill has also reduced from around 72% in 2005/06 to 22% in 2011/12 due to effective use of the Allington Energy from Waste facility. Currently, Ashford achieves the lowest level of recycling in Kent, at 21.53% in 2008/9 compared to a mean average for all the Kent Districts of 32.9% in 2008/9 although this is likely to improve following the introduction of a new recycling scheme in the borough in 2013.

Minerals

2.11.9 Kent County Council's May 2012 consultation for the Kent Minerals and Waste Development Framework identifies a preferred option of Newlands Farm, Charing for bedrock sand and silica sand. Adoption of the Minerals and Waste Plan is expected later in 2013/early 2014.

What is the baseline projection?

2.11.10 Without mitigation measures, increasing waste arisings are likely to occur in the Borough as a result of a larger population and related housing and employment growth. With measures including waste minimisation, improvements in recycling rates and the promotion of good design and construction practices, an improvement against the baseline position is predicted. Significant development on high grade agricultural land is likely to be avoided where possible.

What are the sustainability issues which the SA should address?

- Given the scale of growth anticipated in the Borough over the Local Plan period, it will be important for developers to minimise the amount of waste from construction. Sustainable construction materials should be encouraged.
- Need for continued investment in recycling and composting capacity in order to manage the Borough's waste in future
- Need to minimise development on the borough's high grade agricultural land
- The overall need to deliver sustainable patterns of development, including employment and housing.

THEME: ECONOMY AND EMPLOYMENT

2.12 ECONOMIC GROWTH, EMPLOYMENT AND SKILLS

What is the sustainability context?

- 2.12.1 Economic growth, employment and skills are important in creating sustainable communities by creating employment opportunities, good environments to live and work and boosting town centre vibrancy. Local economies are also characterised by a range of interlinked factors, including housing, access to services and transport, all of which are covered as sustainability topics in this report.
- 2.12.2 In 2010, the European Union published its strategy for achieving growth up until 2020²⁰. This strategy focuses on growth through the development of knowledge and innovation; sustainable growth based on a greener, more resource efficient and competitive economy; and inclusive growth, aimed at strengthening employment and social cohesion.
- 2.12.3 The Department of Business, Innovation and Skills' policy paper on *Supporting Local Growth* sets out the Government's intended measures to achieve its priority of helping businesses to expand and grow, and promoting strong local economies. This builds on the *Local Growth: Realising Every Place's Potential White Paper (2011)*. Measures include;
- ongoing support for Local enterprise partnerships
 - financial support to local economies through the Regional Growth Fund, Growing Places Fund and the Get Britain Building Fund.
 - The New Homes Bonus, the Community Infrastructure Levy and business rate reform to ensure councils and communities benefit from development.
- 2.12.4 The *Local Growth White Paper (2010)*²¹ emphasises the need to remove barriers to growth (e.g. infrastructure constraints, transport congestion and poor connections), support areas facing long term growth challenges and strategic intervention where it can stimulate private sector investment in new green technology. The White Paper also identifies that economic policy should be judged on the degree to which it delivers strong, sustainable and balanced growth of income and employment over the long-term, with growth being broad-based industrially and geographically.

²⁰ European Commission (2010) Europe 2020: A strategy for smart, sustainable and inclusive growth [online] available at: <http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:2020:FIN:EN:PDF>

²¹

- 2.12.5 One of the NPPF's core planning principles (paragraph 17) is that planning should *'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.* NPPF (paragraphs 42 & 43) also stresses that advanced, high quality communications infrastructure is essential for sustainable economic growth and that high speed broadband technology and other communication networks play a vital role in enhancing the provision of local community facilities and services. Local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband.
- 2.12.6 The NPPF states that planning authorities should plan for the delivery of sustainable transport and other infrastructure needed to support their planned economic development and, where necessary, provide advice on the phasing and programming of development. Local planning authorities must also assess the existing and future supply of land available for economic development and ensure that land is available to meet the infrastructure needs arising from development.
- 2.12.7 The 'significant untapped potential' of rural areas to contribute to economic growth and employment is also recognised in the report Missing Links²². It considers distance to market to be a crucial concern and calls for the improvement of transport links and the provision of adequate digital infrastructure.
- 2.12.8 The South-East Local Economic Partnership (LEP)²³ sets out as its mission to create *'the most enterprising economy in England through steady, sustained economic growth'*. To achieve this aim, it sets out a number of objectives for the next twenty years. Two objectives of particular relevance to Ashford are:
- Strengthen our rural economy;
 - Strengthen the competitive advantage of strategic growth locations: Ashford is included as a location where significant economic growth is being encouraged.
- 2.12.9 Particular aspirations are that every community across the LEP is served by superfast (100 mbps or greater) broadband networks and that there will be a steady flow of public and private investment in strategic infrastructure, including better connections to key global markets.
- 2.12.10 *Unlocking Kent's Potential: Kent County Council's Framework for Regeneration (2009)* is KCC's 25 year masterplan for the regeneration of the County. The strategy emphasises the importance of education and skills and an efficient transport system and identifies the following priorities;
- building a new relationship with business;
 - unlocking talent to support the Kent economy;
 - embracing a growing and changing population;
 - building homes and communities, not estates;
 - delivering growth without transport gridlock.

²² Federation of Small Businesses (2012) The Missing Links - Revitalising our rural economy [online] available at: http://www.fsb.org.uk/policy/assets/rural_report_web_final_proof.pdf

²³ South East LEP (2012) Our Vision available at: <http://southeastlep.com/about/our-vision>

2.12.11 *21st Century Kent* (2010) is KCC's spatial vision for the County which sets out KCC's aspirations for the future within the context of the Framework for Regeneration. The strategy places an emphasis on realising the growth aspirations of Kent's Growth Areas and identifies Ashford as a 'powerhouse' which will drive sub-regional growth.

What is the current sustainability context?

Employment Land

2.12.12 The Ashford Employment Land Review (Nathaniel Lichfield & Partners, 2008) indicates that Ashford has a sizeable employment land supply compared to other local authorities in Kent, with the second highest combined number of industrial and office premises. It identifies Ashford's main current employment sites, the majority of which are located within Ashford town centre and the immediate surrounding area. These include 13 well established industrial estates, including Cobbs Wood, Henwood and Mace Road estates; Orbital Park containing newer industrial space, car related business and a hotel; Eureka Business and Science Park containing modern office space; and older office blocks in Ashford town centre, including International House, Kent House and Trafalgar House (1960s/70s).

2.12.13 Additional employment sites are located on the edge of the town centre at Sevington, Waterbrook, and Cheeseman's Green. The majority of Ashford's premises are factories, which also occupy the greatest amount of employment floorspace (51%) in Ashford. Combined with the percentage of warehouse floorspace (36%), industry is the predominant activity in Ashford Borough. The office sector (13%) is less developed compared to other parts of Kent (24% of employment floorspace comprising offices in Tunbridge Wells and 20% in Maidstone and Shepway).

2.12.14 The Ashford Employment Land Review (2008) identified that the majority of Ashford's premises are factories, which also occupy the greatest amount of employment floorspace (51%) in Ashford. Combined with the percentage of warehouse floorspace (36%), industry is the predominant activity in Ashford Borough. It also stated that the office sector (13%) is less developed compared to other parts of Kent (24% of employment floorspace comprising offices in Tunbridge Wells and 20% in Maidstone and Shepway).

Employment and Economic Activity

2.12.15 Business density in 2008 (the number of businesses per 10,000 working age population) in Ashford (544) is higher than the Kent (425), regional (476) and national average (409). This indicates a strong local economy as more businesses mean more opportunities for supply chain links and collaboration (Ashford Economic Profile, 2009).

2.12.16 In 2008 there were 4,835 VAT registered businesses in Ashford, representing growth of 1,370 (+40%) since 1994. This rate of growth was above the Kent average (+27%), the regional rate (+31%). Self-employment is often used as a proxy for the level of enterprise in a local economy. There are around 8,000 self-employed residents in Ashford, a rate of 12% of the working age population, above the regional (11%) and national averages (9%) and in line with KCC (Ashford Economic Profile, 2009).

2.12.17 In 2007, there were 3,865 VAT based businesses²⁴ in Ashford Borough of which 39% were in the rural area (Source: ONS, 2007). In terms of enterprises by broad industry group within

²⁴ Note that VAT-based enterprise totals will differ slightly from the number of VAT-registrations published by HM Revenue & Customs due to timing and differences in definitions – this explains the differences between the 2007 and 2008 data.

the rural area, Ashford has a higher proportion of agricultural businesses (14.9%) compared to the South East (9.6%). Wholesale, Construction and Transport enterprises were also slightly higher in Ashford's rural area compared to the South East (see Annex 3).

- 2.12.18 The percentage of economically active people in employment (October 2011 – September 2012) at 73.6%, is lower than the South East Figure of 74.6%, but higher than the GB figure of 70.5%. However, the proportion of resident population aged 16-64 claiming Job Seekers Allowance (JSA) in December 2012 stood at 2.6%, higher than the South East (2.4%). This figure is slightly higher than that for 2010 and 2011 (2.5% and 2.6% respectively), but lower than the peak of 2.7% in 2009. Proportionally, the figure for males seeking JSA is higher than that for women, at 3.5%, compared to 3.1% for the South East and 4.8% for GB. For females, the Ashford figure is 1.7% compared to 1.6% for the SE and 2.5% for Great Britain (Source: ONS claimant count).
- 2.12.19 In 2006 GVA per head stood at £17,370 below the South East average of £20,152. In addition, although growth in GVA per head since 1998 (+48%) has outpaced the regional average (+45%), it remains below that experienced in the neighbouring district of Maidstone (+53%).
- 2.12.20 The largest sectors in terms of employment in Ashford borough are: retail and distribution (20% of employees or 9,600 jobs); business services (15% of employees or 7,300 jobs) and the public services (24% of employees or 11,900 jobs). Compared to the region as a whole, employment in transport and communications (9%), manufacturing (11%) and retail and distribution (20%) are over-represented in the local economy (Ashford Economic Profile, 2009).
- 2.12.21 An efficient telecommunications network fit for the 21st century is an important factor in ensuring economic competitiveness. Ashford has been announced as one of five Kent towns to benefit from the rollout of 4G mobile broadband. This will have download speeds of at least five to seven times faster than existing 3G networks. The benefit for Ashford is that the 4G network will not only cover main towns, but the surrounding suburban and rural areas that surround them.
- 2.12.22 In terms of Labour Supply (October 2011 – September 2012), Ashford has a lower proportion of residents who are economically active (76.8%) compared to the South East (79.3%). Of the economically active, Ashford has a lower proportion of employees (61.9%) and a higher proportion of self-employed (11.3%) compared to the South East (63.4% and 10.8% respectively)²⁵
- 2.12.23 In terms of employment by occupation, Ashford has a lower proportion of people employed in professional and managerial occupations (42.4%) compared to the South East (48.2%) and Great Britain (43.7%) (ONS, October 2011 – September 2012). Similarly, Ashford has a higher proportion of residents employed in the skilled trades (15.3% compared to 10% for the SE) and a higher proportion of people employed in 'process plant and machine operatives' and 'elementary occupations' categories (19.3% compared to 13.8% for the SE – see Annex 3). The *Ashford Skills Strategy* suggests that part of the problem in attracting higher value added businesses to the area is that Ashford is seen as a low wage, high employment area where people can get by without high levels of skills (Ashford Economic Profile, 2009).

²⁵ Source: ONS annual population survey

2.12.24 Gross weekly pay earnings²⁶ by residence for 2012 was 10% lower in Ashford (£497.4) than the South East (£555.80). Hourly pay for full time workers is also lower at £12.48 compared to £14.24 for the SE. In terms of JSA claimants by age duration, the 18-24 age group have the higher percentage of claimants, at 5.4%. This compares to 4.3% in the South East and 6.7% for GB.

Education and Skills

2.12.25 A high proportion of residents in Ashford have low qualifications. At NVQ level 4 (degree level and above), 30.3%²⁷ of the resident population had gained a qualification in 2011, below the SE (36.2%) and the national average (32.9%). In addition, 69.2% of Ashford's resident population have qualifications of NVQ Level 2, which is a lower proportion than the SE percentage of 73.3% and Great Britain percentage of 69.7%. Increasingly, Level 2 is seen as the minimum platform of skills required for employment and business competitiveness. 53.9% of local residents were qualified at NVQ Level 3 compared to 56.7% in the SE. 10.4% of Ashford residents had no qualifications, which is slightly lower than the percentage for Great Britain (10.6%), but higher than the South East (7.9%).

2.12.26 Table 10 shows that GCSE attainment for the percentage of pupils gaining 5+ A*-C grades, including English and mathematics in Ashford is below both the Kent and the England percentage.

Table 11: GCSE Results – Ashford and England

2010/11	Ashford % of pupils	Kent % of pupils	England % of pupils
5+ A*-C grades	75.0%	-	79.5%
5+ A*-C grades inc. English and mathematics GCSEs	51.9%	59.4%	58.9

Source: Kent County Council

2.12.27 As set out in Section 2.6, nine Super Output Areas located in the wards of Stanhope, Aylesford Green, Bybrook and Beaver are within the 10% most deprived in England for Education and Training (Indices of Deprivation 2010). In particular, one SOA in Stanhope (E01024020) is within the 1% most deprived in England for Education and Training.

What is the baseline projection?

2.12.28 Without the Local Plan, there would be less certainty about the availability and deliverability of employment land for business uses. This would have a negative impact on the availability of employment locally, which would otherwise help increase the skills base in the borough. The Local Plan will also facilitate the delivery of new educational facilities due to the growing population base, and attract people to live in the borough who have a higher skills base.

What are the sustainability issues which the SA should address?

²⁶ Source: ONS annual survey of hours and earnings - resident analysis

²⁷ Source: ONS annual population survey – Qualifications (Jan 2011 – Dec 2011)

- A higher percentage of the working population have a low level of skills, categorised as NVQ level 2 or above, compared to the national average.
- The low level of highly skilled jobs and value-added businesses in Ashford, compared to the South East, and the specific pockets of skills-related deprivation at Stanhope. This creates issues of low gross weekly earnings and barriers to employment which affect the spending power and quality of life of some Ashford's residents.
- Delivery of broadband across the borough, particularly in rural areas, to facilitate home working and rural businesses.

2.13 TOWN AND DISTRICT CENTRE VITALITY

What is the policy context?

2.13.1 Town centre vitality and regeneration is a policy priority for Ashford Borough Council. The NPPF (paragraph 23) states that planning policies should promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In particular, LPA's should:

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- define a network and hierarchy of centres that is resilient to future economic changes;
- define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted;
- promote competitive town centres that provide customer choice and a diverse retail offer which reflects the individuality of town centres;
- retain and enhance existing markets and, where appropriate, reintroduce or create new ones
- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres and undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available.
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres

What is the current baseline context?

Ashford Town Centre

2.13.2 The current Core Strategy reinforces the importance of Ashford town centre as the most efficient and sustainable location for major shopping activity. As such, it occupies the top of the borough's retail hierarchy and site allocations are made in the Town Centre Area Action Plan.

2.13.3 Several town centre allocations will help contribute towards the regeneration of Ashford town centre. The status of these sites is as follows:

- K College: Plans for the 100,000sq ft of new college campus (K College) in Ashford Town Centre are currently on hold due to the financial position of K College
- Elwick Place: a 6.65 acre retail/leisure led development with the potential for up to 500,000 sq ft of new floorspace. Opposite the major extension to County Square shopping centre, it provides opportunities for retail, leisure, office and residential uses. The Homes and Communities Agency are continuing to work with their Joint Venture Partner, Stanhope Plc who is looking for occupiers before progressing a detailed planning application.
- Commercial Quarter: has the potential to create up to 4,000 jobs in this 6 hectare town centre location. The masterplan sets out an overall development of circa 80,000 m² of mixed use development comprising:
 - 56,000 m² of Class B1 Business.
 - 13,000 m² of Class C3 Residential (150 units).
 - 3,000 m² of Class A1/A2/A3/A4/A5 Retail.
 - 4,000 m² of Sui Generis and Class D1 Assembly and Leisure.
 - 4,000 m² of Class C1 Hotel.

Town Centre Performance

- 2.13.4 High Street footfall is undertaken by a volunteer on behalf of the Town Centre Partnership and provides an indicator of trends. Two points are measured on the High Street outside Boots and Halifax. Figures can be influenced by the weather, school holidays, national events and local events, but provide indicative figures.
- 2.13.5 In 2012, the overall footfall figures show a drop of approximately -3.9% on 2011 figures and a -4.7% drop on figures for 2009. This reflects national and regional trends in the last few years across town centres in the UK. County Square footfall figures which are calculated from door entry counters also show a -3.8% drop between 2011 and 2012. Table 12 shows the total vacancy rates for units within the town centre.

Table 12: Ashford Town Centre: Total Vacancy Rate – October / November 2012

	Vacancy Rates	Source
Ashford	14.2%	Ashford Borough Council
National	14.3%	Local Data Company (independent survey).

- 2.13.6 Ashford Borough Council has been surveying vacancy rates in Ashford Town Centre since September 2008. Figures for 2012 show that vacancy rates have stabilised at around 14%, with churn taking place through shops closing and other shops opening. The latest National Figures show that Vacancy rates in Ashford are in line with the National Average for the Local Data Company.
- 2.13.7 Initiatives such as Ashford town centre's 'Portas Pilot' status, an initiative to help revitalise Ashford's market and make it a destination point for shoppers and boost linkages to the Ashford Designer Outlet, will be beneficial in helping increase growth and footfall.
- 2.13.8 Currently, the Town Centre Area Action Plan is adopted and remains a material consideration. This sets out the overarching, site specific policies for the Town Centre.

However, the Local Plan review will be an opportunity to reinforce and, where relevant, update key policy issues which relate to the Town Centre. This will ensure that an up to date framework is in place once the Town Centre AAP is reviewed in due course.

Tenterden

- 2.13.9 Tenterden is a traditional rural market town in the south-west of the Borough. It is the main rural service centre and secondary retail centre in the borough and the second largest settlement after Ashford. It offers a significantly different scale and level of service provision compared to the Borough's other rural settlements.
- 2.13.10 Tenterden is a highly important focal point in the rural area and serves a wide hinterland within and beyond the Borough's boundary by offering a range of jobs, cultural, shopping, tourist and leisure opportunities within and beyond its town centre. The town's character is of exceptional conservation and historical importance, derived from its well defined pattern of development around the historic core area and many listed buildings. The Council's priority is to retain the qualities that make Tenterden special whilst enabling a planned expansion of development commensurate with the Core Strategy.
- 2.13.11 Tenterden is relatively well served with convenience floorspace having two main foodstores and provides a different shopping experience commensurate with its attraction as a tourist centre and the historic character of the town. Several well-known national High Street retailers are present in Tenterden. The Core Strategy encourages new retail uses that help to broaden the scope of comparison goods shopping available in the town, whilst being of an appropriate scale and nature to reflect its environmental constraints and historic character.

What is the baseline projection?

- 2.13.12 Current uncertainties surrounding the economy mean that, in the short term, footfall in Ashford town centre may not improve, but in the medium to longer term, there should be an upturn in the economic fortunes of the town centre. The Local Plan presents an opportunity to address the issues of town centre vitality through a policy based approach. The focus for Ashford town centre will be to increase vitality and regeneration, whilst for Tenterden, the approach is to retain and protect Tenterden's character and appeal as a thriving market town.

What are the key sustainability issues which the SA should address?

- Continued initiatives will be required to help address the increase in vacancy rates within Ashford town centre and decrease in footfall.
- Some job loss is likely to be associated with the closure of shops and businesses in Ashford town centre due to current economic conditions; initiatives to encourage new businesses to locate within empty units should be encouraged.
- In Ashford town centre, there is a need to ensure that sites of an adequate size are available to meet the needs of businesses wishing to locate or grow within the town centre.

- In Tenterden, there will be a need to ensure that any new development does not detrimentally affect the character of the town or its conservation areas.

THEME: SUSTAINABLE TRANSPORT

2.14 SUSTAINABLE TRAVEL

What is the sustainability policy context?

- 2.14.1 Transport plays a vital role in supporting sustainable development. In economic terms, an efficient and well managed transport network connects localities and regions to national and international markets, secures the localised benefits of agglomeration economies and underpins private sector productivity gains. Good connectivity can also stimulate labour market flexibility through improvements in accessibility, allowing a wider range of the population to access employment opportunities. Environmental impacts, such as poor air quality, can be reduced by sustainable transport schemes which may include fast, efficient and affordable public transport as well as the provision of walking and cycling infrastructure.
- 2.14.2 The NPPF²⁸ states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities. Larger scale residential developments should promote a mix of uses in order to provide opportunities to undertake day-to-day activities, including work on site. Large-scale developments should aim to include facilities such as primary schools and local shops, located within walking distance of most properties (paragraphs 37 and 38).
- 2.14.3 At the European level, the Air Quality Framework directive (96/62/EC) sets a strategic framework for tackling air quality consistently through setting European-wide limit values for twelve air pollutants. The Government's *Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2011)*, required under the Environment Act (1995), sets out plans to improve and protect air quality in the UK and places a statutory duty on local authorities for local air quality management (LAQM) through regular reviews and assessment against national objectives. Where it is found that objectives are unlikely to be met, Local Authorities must designate air quality management areas (AQMAs) to tackle the problem.
- 2.14.4 KCC's Regeneration Framework, *Unlocking Kent's Potential*, is a 25 year masterplan which identifies the opportunities and challenges facing the County over the coming decades. This document is supported by a Transport Delivery Plan for Kent, *Growth without Gridlock*, which highlights the key transport solutions needed over the next 20 years. Key elements of this plan include delivering a long-term solution to Operation Stack; improving rail journey times to East Kent; creating an integrated bus network; and linking new infrastructure more closely to the local planning process.
- 2.14.5 The Kent Local Transport Plan 2011 - 16 (KCC, 2011), called LTP3, has been to develop five Themes relevant to Kent:
- Growth Without Gridlock
 - A Safer and Healthier County
 - Supporting Independence
 - Tackling a Changing Climate

²⁸ Paragraphs 37-38

- Enjoying Life in Kent

2.14.6 LTP3 contains eight Implementation Plans which correspond to the five LTP3 Themes for the Plan period. The Transport Programme prioritises schemes which help to unlock the major development sites identified in Ashford's current development plans and those which improve the operation of the highway network and promote sustainable transport, including bus priority measures in the town centre. Major transport proposals for Ashford within LTP3 include M20 Junction 10A, which would provide the highway capacity to serve the new development sites to the south and east of Ashford. This is also considered in the National Roads programme and is deferred until at least post 2015, and the dualling of the A28 Chart Road Phases 1-3.

2.14.7 *Growth without Gridlock: a Transport Delivery Plan for Kent* (2010) responds to the economic and regeneration pressures outlined in the County Council's Framework for Regeneration and specifies how transport interventions can contribute to the alleviation of these pressures. The policies and objectives set out in *Growth without Gridlock* underpin the LTP3 Strategy.

2.14.8 Kent County Council's *Kent Environment Strategy* (2010) has three key themes: Living well within environmental limits; Meeting the Climate Change Challenge and Value from our natural and living environment. The Strategy recognises the contribution of transport to reducing emissions through the promotion of home working, electric and hydrogen car infrastructure and the promotion of walking, cycling and public transport. The strategy seeks to reduce carbon emissions from local transport year on year by 2.6%, leading to a 20% reduction by 2020, a 40% reduction by 2030 and an 80% reduction by 2050.

2.14.9 The *Ashford Transport Strategy* (2006) notes that travel within Ashford is dominated by the private car, the daily car/public transport modal split is 95.5% by car and only 4.5% by bus and rail. Almost 85% of the population live within 400m of a bus route which provides at least an hourly service. Thus there is already the potential for many more people to use the bus services.

2.14.10 The *Ashford Cycling Strategy 2011 – 2016* focuses on the need to encourage people to cycle to work instead of using cars, and thus help to reduce congestion and pollution in the area and promote regular exercise. The strategy states that there has been a year on year increase in average cycling figures. For 2006-07, there was a 13.3% increase in cycling. Strategy targets include:

- Increase the amount of people cycling to work to 5% by 2015
- Plan and construct a comprehensive cycle network in Ashford
- Integrate the Cycling Strategy with Ashford's Public Transport Services
- Help local schools increase the numbers of pupils, staff and parents switch to cycling to travel to and from school
- Ensure all future cycling/shared routes also serve local schools where possible
- Promote the health benefits of cycling (such as active commuting) via projects with local businesses and schools
- Promote an annual cycling event for all abilities and ages

What is the current baseline position?

2.14.11 Ashford benefits from good transport links both locally and internationally, by rail and road, including the M20 and A28. The opening of the High Speed 1 (HS1) domestic rail service in December 2009 has connected Ashford to London in 37 minutes. An assessment of the

economic impact of HS1₂₁ assumes a significant increase in commuting demand will occur due to this high speed connection.

2.14.12 Figure 6 shows the main road and rail routes within Ashford Borough.

Figure 6: Road and Rail routes within Ashford Borough



2.14.13 According to the 2011 Census work flows data (data due for release in November 2013), there were a total of X people working in Ashford borough. Of this total, X% live and work in the district, and X% commuted into work in Ashford from elsewhere. Out-commuting flows from Ashford were larger: of the residents in work in the district in 2011, X% lived and worked in Ashford and X% commuted out of the area to work elsewhere.

2.14.14 Table 13 shows the method of travel to work for 'All Usual Residents aged 16-74 in employment'. The data shows that a slightly higher proportion of people work at home compared to the SE (6.9% compared to 6.6%) and a higher proportion drive a car or van (64% compared to 60.8%), perhaps indicative of the rural nature of much of the borough. A lower proportion take the train (5.6% compared to 4.5% for the SE), but more take a bus, minibus or coach (5.6% compared to 4.5%).

Table 13: Method of Travel to Work for All Usual Residents aged 16-74 in Employment

Method of Travel	Ashford	South East
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Work Mainly at or From Home	6.9	6.6
Underground, Metro, Light Rail, Tram	0.4	0.8
Train	6.5	7.3
Bus, Minibus or Coach	5.6	4.5
Taxi	0.3	0.8
Motorcycle, Scooter or Moped	0.7	0.9
Driving a Car or Van	64.0	60.8
Passenger in a Car or Van	5.4	4.7
Bicycle	0.3	3.0
On Foot	10.3	10.9
Other Method of Travel to Work	0.1	0.7

2.14.15 The 2011 data for the sale of bus tickets was taken from 14th to 18th November 2011. The figures have shown an increase of 5.30% from 22,790 in 2010 to 23,997 in 2011 (Kent Travel Report 2011).

2.14.16 Ashford has an extensive network of cycle routes. National Cycle Route 18 runs through the town linking Ashford to Canterbury in the north and to Tenterden and Tunbridge Wells to the South West. Funding has been secured to deliver a new route called the Willesborough Greenway Cyclepath which will run from Kimberley Way, across the Willesborough Dykes to Sheepfold Lane at Park Farm. Completion is expected by mid 2013.

Air Quality

2.14.17 Air Quality is measured against standards set by the UK government. Not all pollutants are measured in all areas across the UK. DEFRA use computer models to predict air quality conditions across the country and to forecast upcoming local air quality. The latest annual report for the borough, submitted to Defra, was the Updating and Screening Assessment 2012 and is available at; <http://www.ashford.gov.uk/air-quality>

2.14.18 All targets set by the Government are based on a 12 month annual average for each of the pollutants measured. There are also short term averages for most pollutants which reflect current knowledge about exposure levels to certain pollutants. Any measured annual averages exceeding the limits set requires further action by the local authority. As of December 2011, the Air Quality Objectives for Nitrogen Dioxide are being achieved. There are no formally declared Air Quality Management Areas in the Ashford Borough.

2.14.19 The ABC Local Air Quality Management Updating and Screening Assessment (USA) 2012 provides an update with respect to air quality issues within the Borough. The main source of air pollution in the borough is road traffic emissions from major roads, notably the M20, A20, A28 and A292. Other pollution sources, including commercial, industrial and domestic sources, also make a contribution to background pollution concentrations. The USA concluded that all air quality objectives had been met and there was no requirement to undertake a detailed assessment for these pollutants.

2.14.20 In 2007, Ashford's Future, ABC, WWF-UK and English Partnerships commissioned SEI to quantify the environmental consequences of Ashford's growth using Footprint Analysis. The key findings was that Ashford's carbon footprint is 13.15 tonnes per capita, it needs to have decreased by 54% in 2031 to be in line with an 80% reduction in carbon dioxide emissions by 2050. Ashford's baseline ecological footprint today is 5.99gha per capita, it needs to have decreased by 47% by 2031 to meet 'One Planet' targets by 2050. In a best case scenario Ashford may decrease its footprint by 17% to 4.96gha per capita. In a best case scenario

Ashford may decrease its footprint by 26% to 9.78 tonnes per capita (Ashford's Footprint - Now and in the Future, 2008).

What is the baseline projection?

2.14.22 Despite mitigation measures, traffic on the roads within the borough is likely to increase as a result of housing and employment growth. Strategic infrastructure such as junction 10a will be important in enabling housing and employment land to come forward. However, the increase in commuter traffic will be partially offset by the increasing number of people who work from home, a trend which is likely to increase with the rollout of superfast broadband across the borough.

2.14.23 The trend for an increased number of residents to cycle to work is likely to increase with the provision of new cycle links, particularly to destinations such as Ashford International station. Without the Local Plan, there is a risk that key transport initiatives are not prioritised sufficiently in line with housing development. Such initiatives include the provision of bus services and an integrated cycle network.

2.14.24 Air quality in Ashford currently meets government targets. With appropriate management and mitigation, the air quality in Ashford should continue to meet these targets despite the impacts of additional growth.

What are the key sustainability issues which the SA should address?

- Within Ashford, there is a high dependency on private car use; managing the increase in vehicle traffic and air pollution as a result of housing and employment growth will be important.
- Generating significant modal shift by phasing high quality public transport and necessary improvements to the A28 in line with the phased delivery of housing.
- Ensure that there is no significant deterioration in air quality, and that Ashford continues to meet its targets for air pollution. Air quality targets are currently being achieved, but need to be managed within Ashford as growth progresses. Infrastructure, such as cycle paths and dedicated bus routes, to help bring about modal shift will need to be phased in line with housing growth.
- Provision of new safe, high quality routes and networks for cyclists and pedestrians which link with the existing pedestrian and cycle network.
- Ensuring that the transport and movement framework delivers good access to open space, cultural opportunities and the surrounding borough.

3.0 SUSTAINABILITY ISSUES

3.1 SA Themes & Data Gaps

- 3.1.1 The SA themes have considered the economic, social and environmental issues apparent evident from the baseline data review. The SA Guidance (2005) states that specific sustainability issues should be identified which form the basis of key issues which the Local Plan should address. These issues should then form the basis of the sustainability objectives and the DPD options subsequently developed.
- 3.1.2 This baseline review is intended to provide insight into the sustainability topics based on available, published data and other information sources. However, data gaps exist in relation to transport, specifically freight movement data and travel to work patterns. The latter is available through the Census, but as such is only updated every ten years. The Census 2011 data release for travel to work statistics is expected in November 2013.
- 3.1.3 Sustainability issues can be any problems or uncertainties which need to be understood and addressed before the plan can be confidently considered sustainable. Thus, following from the review of relevant plans, policies, programmes, and baseline data in section 2, the following sustainability issues are set out in Table 15.

Table 15: KEY SUSTAINABILITY ISSUES FOR THE LOCAL PLAN

ISSUE	SOURCE	LINK TO SA OBJECTIVE/S
1. Meeting the boroughs need for new housing development and affordable housing, particularly in rural areas	NPPF, ABC housing needs survey (section 2.5).	5
2. Responding to the demographic changes in the borough's population e.g. the ageing population (by planning for care homes, accessible homes and healthcare), the growing proportion of young people (education and skills training) and the increasing Nepalese population.	ABC & KCC data (sections 2.6 & 2.7)	6, 7
3. Provision of infrastructure and services which are phased in line with housing and employment growth and are accessible to the communities they serve.	NPPF, ABC & KCC data (sections 2.6 & 2.7)	6
4. Facilitating the delivery of new, higher skilled jobs within the borough and improving the overall skills base of Ashford's residents.	Data, ABC corporate priority (section 2.11)	12
5. Encouraging modal shift and more sustainable	Section 2.14	8

methods of travel.		
6. Utilising land efficiently and effectively and in a manner which respects the borough's historic, cultural heritage and landscape assets and high grade agricultural land.	Data and GIS (section 2.3)	10, 11, 2, 3, 4
7. Limiting the impact on protected species and enhancing biodiversity through the protection, provision and enhancement of key habitats and linkages to sustain the local habitat network, including through provision of open space, sustainable drainage and green corridors.	Data (section 2.2)	1, 2
8. Provision of strategic open space which meets a range of recreation, public health, ecological, flood risk mitigation and nature conservation objectives.	Environmental and public health data – see sections	4, 1, 7
9. Encouraging the integration of sustainable energy technologies and solutions as part of the design and delivery of new housing	NPPF policy, Council priority, section 2.4	5
10. Ensuring that flood risk is managed appropriately and that new development sites are sequentially tested so that they are allocated to land at least risk of flooding.	Flood risk mapping, EA data (section 2.4)	4
11. Ensuring that the quality of water bodies and groundwater in Ashford does not deteriorate, but improves.	EA data – section 2.9	4
12. Provision of a broadband network across the borough which boosts economic viability and increases the flexibility of homes and business premises.	NPPF policy priority, policy objective for ABC	12, 6
13. Supporting the economic growth and vitality of Ashford and Tenterden town centres.	NPPF, ABC priority	13
14. Helping to reduce deprivation by increasing access to services and employment opportunities.	Data (section 2.6, 2.12), ABC priority	6, 12
15. Encouraging healthier lifestyles through access to green open space, play and recreational opportunities, as well as through the provision of safe pedestrian and cycle routes.	Data (section 2.7)	7, 8
16. Encouraging and securing high quality design in new developments which is appropriate to its	NPPF, ABC policy (section	2, 10, 5

context.	2.8)	
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3.2 Sustainability Appraisal Framework

- 3.2.1 The SA Framework is set out in Annex 1. This has captured the SA objectives based on the findings of the baseline study and sets out the SA prompt questions and monitoring criteria which will be used when undertaking the SA.
- 3.2.2 The Sustainability Appraisal Framework has been used as a basis for developing a site assessment pro forma which will be used to assess sites which come forward through the Strategic Housing Land Availability Assessment (SHLAA), undertaken as part of the Local Plan Review. The site sieving process will, for example, exclude those sites which breach higher level plan policies and European/ national constraints. The site assessment matrix is included in Annex 2.

3.3 Defining 'Significant Effects'

- 3.3.1 The Sustainability Appraisal process will entail a combination of assessment written up as narrative, and matrices of anticipated effects ranging from significant positive to significant negative. The definition of 'significant effects' is set out in Table 15.

Table 15: Definition of Significant Effects

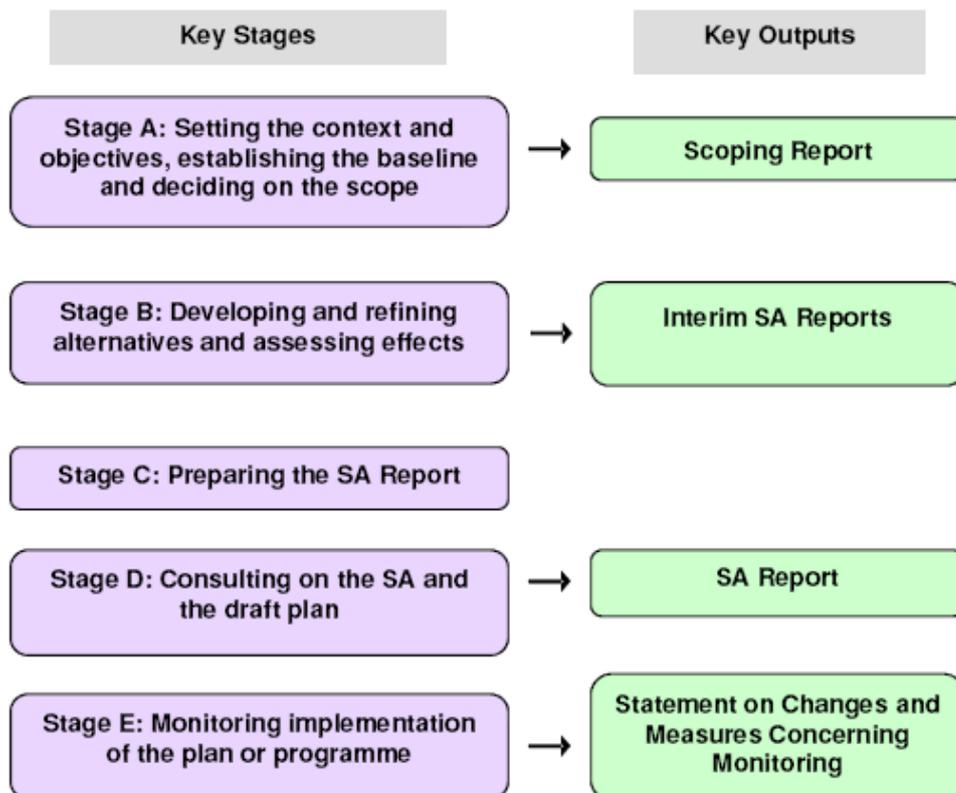
Effect	Description	Illustrative Guidance for Biodiversity
++	Significant positive	Alternative would have a significant and sustained positive impact For example, on European or national designated sites and/or protected species it fully supports all conservation objectives on site or leads to a long term increase in population of designated species.
+	Positive	Alternative would have a minor positive impact For example, on European or national designated sites and/or protected species it supports one of the conservation objectives on site or leads to a short term increase in population of designated species.
0	None - Neutral Effect	Alternative would not have any known effects.
-	Negative	Alternative would have a minor short term (direct or indirect) negative effects. For example, on non-designated conservation sites and species through a minor increase in disturbance/ pollutant emissions or some loss of habitat.
--	Significant Negative	Alternative would have a strong negative and sustained effect. For example, on European or national designated sites and/or protected species, it prevents reaching all conservation objectives

		on site, long term decrease in populations of designated species.
/	No Relationship	There is no clear relationship between the proposed policy and the achievement of the objective or the relationship is negligible.
?	Uncertain	From the level of information available, the impact that the alternative would have on this objective is uncertain.

3.4 What happens next in the SA Process?

3.4.1 Stage B of the Sustainability Appraisal will occur in line with the development of the Local Plan options and alternatives. Interim SA reports will assess the options developed using the SA Framework. A specific pro forma, developed using SA Framework objectives and criteria, will be used screen and assess sites submitted by landowners and developers as part of the Council's Strategic Housing Land Availability Assessment (SHLAA). This provides a transparent method of assessment which will help identify whether the site is potentially suitable for development. See Annex 2 for the SHLAA proforma.

Figure 5: SA Stages



3.4.2 The following Quality Assurance checklist (Table 16) helps ensure that the requirements of the SEA Directive in relation to the SA Scoping Stage are met.

Table 16: Quality Assurance Checklist

Quality Assurance Checklist	
Objectives and Context	
<ul style="list-style-type: none"> The plan's purpose and objectives are made clear. 	The Local Plan is at an early stage of preparation and housing and jobs numbers have not been defined. As such, it is not possible at this stage to specify specific objectives, but the overall purpose of the Local Plan is identified in section 1.
<ul style="list-style-type: none"> Sustainability issues, including international and EC objectives, are considered in developing objectives and targets. 	International and EU objectives are identified in section 2 as part of the thematic baseline review. The commentary outlines where these are taken on board by the SA objectives and framework. Possible indicators (and their sources) are set out in the SA Framework included in section 3.
<ul style="list-style-type: none"> SA objectives are clearly set out and linked to indicators and targets where appropriate. 	Section 3 contains the SA objectives and detailed criteria. Proposals for monitoring have not been identified at this stage and this will be undertaken during the remaining stages of SA.
<ul style="list-style-type: none"> Links with other related plans, programmes and policies are identified and explained. 	Section 2 identifies and reviews these documents.
Scoping	
<ul style="list-style-type: none"> The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the SA Report. 	This Scoping Report will be sent to the three statutory consultees (Natural England, English Heritage and the Environment Agency) and amended/ updated in response to their comments.
<ul style="list-style-type: none"> The appraisal focuses on significant issues. 	Potentially significant sustainability issues have been identified in this report which should assist in focussing on the significant issues in the appraisal.
<ul style="list-style-type: none"> Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit. 	These will be made clear throughout the report where appropriate.
<ul style="list-style-type: none"> Reasons are given for eliminating issues from further consideration. 	These are made clear throughout the report where appropriate.
Baseline Information	
<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and their likely evolution without the plan are described. 	See Section 2. Trends are incorporated at the end of each thematic issue throughout the description of issue.
<ul style="list-style-type: none"> Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable. 	See Section 2.
<ul style="list-style-type: none"> Difficulties such as deficiencies in information or methods are explained. 	These are made clear in section 3.

APPENDICES

Annex 1: SA Framework

SA Objectives for Local Plan SA Scoping Report

SA Objective	Theme: Protection of the Environment and Climate Change
1	Biodiversity
2	Landscape
3	Cultural Heritage and Archaeology
4	Water
Theme: Social Progress	
5	Housing and Affordable Housing
6	Access to Services and Social Inclusion
7	Health and Wellbeing
8	Sustainable Travel
9	Infrastructure Delivery and Availability
Theme: Natural Resources and Material Assets	
10	Land Use, Geology
11	Minerals and Waste and Soil
Theme: Economy and Employment	
12	Economic Growth, Employment and Skills
13	Town and District Centre Vitality

Theme and Topic	Topic prompts – issues to consider where relevant	Current/ Suggested indicator	Link to Ashford 2030 Framework
<p>1. Biodiversity</p> <p>SA Objective: <i>To protect and enhance the Borough's areas of biodiversity importance.</i></p>	<ul style="list-style-type: none"> • <i>Will it avoid adverse impacts on protected International, National and Local sites and Kent or UK BAP habitats and species?</i> • <i>Will it create new habitats and improve the incidence and diversity of species?</i> • <i>Will it enable managed access to natural areas?</i> • <i>Will it improve the green & blue linkages between existing and/or proposed areas of semi natural habitat and species-rich areas?</i> • <i>Is appropriate provision made for replacement habitat of at least equivalent size and value where impacts cannot be avoided?</i> 	<p>Change in areas of biodiversity importance, including loss of habitats, corridors and stepping stones (Areas designated for their intrinsic environmental value, including sites of international, national, regional, sub-regional or local significance).</p> <p>Condition of SSSIs</p> <p><i>The following would be provided by developers as part of their site-specific monitoring:</i></p> <ul style="list-style-type: none"> • Area of habitat created to support BAP priority species • Amount of open space delivered which meets the standards set out in the Green Space and Water Environment SPD. 	<p>8 – Promote wellbeing</p>

<p>2. Landscape</p> <p>SA Objective: To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography.</p>	<ul style="list-style-type: none"> • Will it respect the existing character and quality of the landscape/ townscape? • Does it respond to and reinforce the topography of the area, view corridors and existing landscape features? • Will it avoid adverse impacts on, and enhance, designated and non-designated landscape features? • Will it enhance landscape/townscape character? <p>Will it avoid adverse impacts on visual amenity?</p>	<p>Amount of new development in the AONBs.</p>	<p>2 – Actively support the rural economy</p> <p>8 – Promote wellbeing</p>
<p>3. Cultural Heritage and Archaeology</p> <p>SA Objective: To conserve and enhance sites of cultural heritage and archaeological importance.</p>	<ul style="list-style-type: none"> • Does it respect, and where possible enhance, the character and setting of historic and archaeological assets including listed buildings, registered parks and gardens and scheduled monuments? • Does it respect and enhance the character of conservation areas? • Will it help improve access to, and understanding of, historical and cultural assets? 	<p>Number of heritage assets on the English Heritage ‘At Risk’ register²⁹ (new indicator)</p> <p>Number of Conservation Areas³⁰ (new indicator).</p>	<p>8 – Promote wellbeing</p>
<p>4. Water</p>	<ul style="list-style-type: none"> • Does it promote reduced water demand? 	<p>.</p>	

²⁹ See <http://risk.english-heritage.org.uk/register.aspx>

³⁰ Ashford borough currently has 43 Conservation Areas

<p>SA Objective: To help mitigate, and reduce the impact of, climate change and flooding.</p>	<ul style="list-style-type: none"> • Will it promote onsite energy measures which will help deliver a sustainable water supply? • Will it help to minimise the risk of flooding to existing and new developments/infrastructure and /or promote enhanced flood storage capacity/measures? • Will it maintain and improve ground and/or surface water quality? • Will it help reduce water consumption? 	<p>Percentage of new homes on major sites with a SUDS feature in accordance with the SUDS strategy.</p> <p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.</p> <p>Reduction in average per capita water consumption (over existing consumption levels) in new developments.</p> <p>Number of water bodies classified as 'Bad' or 'Poor' by the Environment Agency (2012 - 6)³¹ (new indicator).</p> <p>Estimated household water consumption (South Eastern Water website/ Environment Agency).</p>	<p>6 – Contribute to the delivery of quality homes</p> <p>7 – Help to develop and sustain successful communities</p> <p>8 – Promote well being</p>
<p>5. Housing and Affordable Housing</p> <p>SA Objective: To ensure the</p>	<ul style="list-style-type: none"> • Does it provide a range of housing types and tenures, including affordable, key worker and special care housing? • Does it include/promote flexible and adaptable housing types, such as live-work units? 	<p>Net additional dwellings for the reporting year.</p> <p>Net additional dwellings over the previous 5 year period or since the start of the relevant development plan period,</p>	<p>6 - Contribute to the delivery of quality homes</p>

³¹ Annual data available from the Environment Agency.

<p><i>delivery of a mix of good quality, sustainably constructed homes to meet identified needs.</i></p>	<ul style="list-style-type: none"> • <i>Does it include provision for gypsy and traveller sites?</i> • <i>Does it promote good quality, sustainably constructed housing?</i> • <i>Will it reduce the number of unfit and empty homes?</i> 	<p>whichever is longer.</p> <p>Number of net additional dwellings completed per annum within the Ashford urban area (excluding town centre).</p> <p>Number of new and converted dwellings on PDL.</p> <p>Affordable housing completions.</p> <p>Number and location of planning permissions granted for dwelling sizes: 1 bed, 2 bed, 3 bed, 4 bed, > 4 bed</p> <p>Percentage of planning permissions granted on all qualifying sites providing 30% of affordable housing in the Ashford growth area and 35% in the rest of the Borough.</p> <p>Net additional Gypsy and Traveller pitches delivered: Transit and Permanent.</p> <p>Number of key worker and special care housing (<i>new indicator – ABC Housing</i>)</p> <p>Number of live-work units (<i>new indicator – ABC Housing</i>).</p> <p>Number of unfit and empty homes (<i>new indicator – ABC Housing</i>).</p> <p>RURAL</p> <p>Number of net additional dwellings completed per annum within rural sites and rural windfall sites.</p>	<p>7 – Help to develop and sustain successful communities</p>
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<p>6. Access to Services and Social Inclusion</p> <p>SA Objective: <i>To ensure that all groups of the Borough's population have access to services and facilities so that opportunities for social inclusion are maximised.</i></p>	<ul style="list-style-type: none"> • <i>Will it improve access to high quality education, training, health and community facilities?</i> • <i>Would it help reduce deprivation in the Borough's most deprived wards?</i> • <i>Would it protect or enhance the retail offer?</i> 	<p>Number of developments meeting the standards set out in the Green Spaces and Natural Environment SPD.</p> <p>Number 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 (on permitted applications).</p> <p>Number of new primary school and secondary school places created³² (<i>new indicator</i>).</p>	<p>7 – Help to develop and sustain successful communities</p> <p>8 – Promote well-being</p>
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³² Data available from KCC

<p>7. Health and Wellbeing</p> <p>SA Objective: To improve the health and quality of life for those living and working in the Borough.</p>	<ul style="list-style-type: none"> • <i>Would it encourage residents to make healthier lifestyle choices by increasing accessibility to shops, services and health facilities by foot and/or cycling?</i> • <i>Will it increase accessibility to high quality, green open spaces?</i> • <i>Will it improve accessibility to play spaces?</i> • <i>Will it improve accessibility to GP facilities?</i> • <i>Would it create a detrimental impact in terms of noise or light pollution?</i> 	<p>Life expectancy: male & female (<i>new indicator</i>³³).</p> <p>Number of SOAs ranked by Indices of Deprivation as within the 20% most deprived nationally due to health factors³⁴.</p> <p>Number of Homeless within the Borough (<i>new indicator – ABC Housing</i>)</p>	<p>7 – Help to develop and sustain successful communities</p> <p>8 – Promote well-being</p>
<p>8. Sustainable Travel</p> <p>SA Objective: To encourage modal shift and enhance connectivity between communities and town/ district</p>	<ul style="list-style-type: none"> • <i>Will it encourage development in accessible locations that reduce the need to travel?</i> • <i>Will it create or improve pedestrian and cycle links between communities and the town/ district/ village centres?</i> • <i>Will it help reduce traffic levels and congestion and improve road safety?</i> • <i>Will it encourage the use of public transport?</i> 	<p>Bus ticket sales.</p> <p>Cycle paths created (<i>new indicator</i>)³⁵.</p> <p>Distance travelled to work – resident population (Census 2011).</p> <p>Modal split – NB: cannot currently monitor.</p> <p>Number of Air Quality Management Areas</p>	

³³Dept Health www.healthprofiles.info, current: male 81.2 (England average 78.6) female: 83.7 (England average 82.6)

³⁴ Indices of Deprivation 2010: there is one SOA within Ashford which is within the 20% most deprived nationally for health.

³⁵ ABC Cultural Services to provide information

<p><i>centres through safe pedestrian and cycle routes.</i></p>	<ul style="list-style-type: none"> • <i>Will it improve local air quality?</i> 	<p>(target = 0). Air quality targets for nitrogen dioxide and particulates achieved (yes/ no)³⁶.</p>	
<p>9. Infrastructure Delivery and Availability</p> <p>SA Objective: To ensure that development responds appropriately to current and future infrastructure requirements</p>	<ul style="list-style-type: none"> • <i>Is the site reliant on the delivery of large scale/significant infrastructure to make it deliverable?</i> • <i>Does the local road network have suitable capacity to provide for the site?</i> • <i>Is there adequate capacity in the local sewer network to provide for the site?</i> • <i>Is the nearest GP surgery currently accepting new patients?</i> • <i>Is there adequate primary school place provision for the site?</i> 	<p>Large infrastructure projects in the pipeline and expected delivery dates</p> <p>School place delivery statistics</p> <p>Number of planning applications for new health provision in the Ashford Borough</p>	<p>1 – Generate strategic investment in the economy of the town centre and urban areas</p> <p>3 - Maximise the benefits of Ashford's location</p> <p>4 – Engage positively with our partners</p> <p>6 – Contribute to the delivery of quality homes</p> <p>7 – Help to develop and sustain successful</p>

³⁶ Nitrogen dioxide: 200 µg/m³; not to be exceeded more than 18 times per year.

Particulates: 50 µg/m³ Not to be exceeded more than 35 times per year. Tracey Butler to provide annual monitoring.

<p>10. Land Use, Geology</p> <p>SA Objective: <i>To protect and make the most efficient and appropriate use of land, soils and geological assets.</i></p>	<ul style="list-style-type: none"> • <i>Does it bring previously developed land and/or vacant buildings back into use?</i> • <i>Will it avoid adverse impacts on important geological sites?</i> • <i>Will it bring contaminated land back into use?</i> 	<p>Percentage of new housing development on previously developed land.</p> <p>Percentage of employment floorspace.</p>	<p>communities</p> <p>6 – Contribute to the delivery of quality homes</p> <p>7 – Help to develop and sustain successful communities</p> <p>8 – Promote well-being</p>
<p>11. Minerals and Waste and Soil</p> <p>SA Objective: <i>To ensure the prudent use of resources and the sustainable management of waste.</i></p>	<ul style="list-style-type: none"> • <i>Would development affect existing mineral reserves?</i> • <i>Is the site designated as a Regionally Important Geological Sites?</i> • <i>Does it minimise the irreversible loss of high grade (1, 2 and 3a) agricultural land?</i> 	<p>Number of new developments on existing mineral reserves (<i>new indicator</i>).</p> <p>Number of new developments proposed on Regionally Important Geological Sites.</p> <p>Amount of development on Grade 1, 2 and Grade 3a agricultural land.</p>	

<p>12. Sustainable Economic Growth, Employment and Skills</p> <p>SA Objective: <i>To facilitate sustainable economic growth and high quality employment opportunities in accessible locations within the Borough and increase the skills base of Ashford's residents.</i></p>	<ul style="list-style-type: none"> • <i>Will it help increase inward investment by facilitating accessible employment space/land?</i> • <i>Would it help support rural businesses and/or generate local employment opportunities?</i> • <i>Will it help reduce the level of deprivation in the Borough's most deprived areas?</i> • <i>Will it help prevent the loss of existing businesses?</i> • <i>Would it help support sustainable tourism?</i> • <i>Will it bring forward a range of employment and business uses/premises?</i> • <i>Will it bring forward educational/ learning institutions?</i> • <i>Will it provide the necessary infrastructure to support economic growth?</i> • <i>Will it improve the physical accessibility of jobs?</i> 	<p>Amount of existing tourism facilities gained and lost (unless satisfactory replacement facilities are provided) as a result of new development.</p> <p>Total amount of additional employment floorspace completed in the rural areas by type m2 (gross) i. B1a, ii. B1b, iii. B1c, iv. B2, v. B8, vi. A2.</p> <p>Employment rates (Nomis – ED collect).</p> <p>Number of additional jobs created within Ashford town centre per annum.</p> <p>Total amount of additional employment floorspace - by type m2 (gross and net) i. B1a, ii. B1b, iii. B1c, iv. B2, v. B8.</p> <p>Total amount of employment floorspace completed (gross) by type on previously developed land.</p> <p>Earnings per capita (ONS via NOMIS)</p> <p>Number of educational/ learning institutions brought forward in Ashford.</p> <p>Proportion of Ashford's residents qualified to NVQ level 3 and above.</p>	<p>1 – Generate strategic investment in the economy of the town centre and urban areas</p> <p>2 - Actively support the rural economy</p> <p>3 - Maximise the benefits of Ashford's location</p> <p>4 – Engage positively with our partners</p> <p>7 – Help to develop and sustain successful communities</p>
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		<p>Average weekly income for residents within the Borough (Nomis).</p> <p>% of pupils obtaining 5 or more GCSEs at grades A*-C³⁷ (Percentage of working age population with higher level qualifications (Level 4 and above) – Nomis/ Census.</p>	
<p>13. Town and District Centre Vitality</p> <p>SA Objective: <i>To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.</i></p>	<ul style="list-style-type: none"> • <i>Does it promote a mix of uses which will help generate and maintain vitality in the town centre?</i> • <i>Does it help reinforce Ashford/ Tenterden's role in the retail hierarchy?</i> • <i>Would it help reduce deprivation in Ashford town centre's most deprived areas?</i> • <i>Will it help promote urban regeneration?</i> 	<p>Total amount of floorspace for town centre uses, defined as A1, A2, B1a, D2.</p> <p>Ashford town centre vacancy rates</p> <p>Tenterden town centre vacancy rates (new indicator)</p> <p>New multi storey public car parking spaces in the Town Centre by 2021.</p> <p>Number of new tourism facilities gained and lost (unless satisfactory replacement facilities are provided) in Tenterden and Ashford town centres as a result of new development.</p>	<p>1 – Generate strategic investment in the economy of the town centre and urban areas</p> <p>3 - Maximise the benefits of Ashford's location</p> <p>4 – Engage positively with our partners</p>

³⁷ Data from KCC. Ashford % to be compared to Kent and England %

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Annex 2 - Site Assessment Proforma

Site Ref:

Date Survey

Completed: __/__/2014

Site Name:

Site Description:			
No.	Site Assessment/ Screening Question	Assessment of effects, mitigation, uncertainties, assumptions	SCORE
Objective 1: Biodiversity			
1.1	Is the site located within or adjoining a designated habitat?		
1.2	Would development of the site be likely to have significant effect on a Local Wildlife Site?		
1.3	Would development of the site result in the loss of key components in the habitat network, such as woodland, trees/hedgerows, wetland, ponds, streams and ditches or other features supporting protected species or biodiversity?		
1.4	Would development of the site enable the creation of new habitat and/or components in the habitat network?		
1.5	Is the site located within or adjoining the Green Corridor?		
Objective 2: Landscape			
2.1	Is the site within or in the setting of an Area of Outstanding Natural Beauty?*		
2.2	Could development of the site respond effectively to the existing character and quality of the landscape/ townscape?		
2.3	Would there be an identifiable and cumulative visual impact from the development of the site and related sites?		
Objective 3: Cultural Heritage and Archaeology			
3.1	Is the site within or adjoining an area of archaeology importance or a Conservation Area?*		
3.2	Does the site contain or does it adjoin a listed building, scheduled monument (SM) or registered Park/ garden?*		
3.2	Will it respect and enhance the character and setting of Ashford's historic and/or cultural assets?		
Objective 4: Water			

4.1	Is the site wholly or partially in Flood Zone 2 or 3?*		
4.2	Is the site at risk from Surface Water Flooding: from the 1 in 100-year event and/or from the 1 in 30-year event?		
4.3	Is the site suitable to use SuDs infiltration systems?		
4.4	Is the site within a groundwater source protection zone?		
Objective 5: Housing and Affordable Housing			
5.1	Does the site's size and proposed use meet the threshold for the provision of affordable housing? (currently over 15 units/ site area in excess of 0.5 ha)		
Objective 6: Access to Services and Social Inclusion			
6.1	Will development of the site result in the loss or gain of onsite services and/ or facilities?		
6.2	Is the site located in close proximity to a Local Centre/ Shop?		
6.3	Is the site located in close proximity to a GP Surgery?		
6.4	Is the site located in close proximity to a Primary school?		
Objective 7: Health and Wellbeing			
7.1	Is the site located in close proximity to public green open space? (could include informal open space, accessible by the public)		
7.2	Is the site located within close proximity of an equipped play area?		
7.3	Does the site have direct access to a footway (PROW or pedestrian pavement)?		
7.4	Would development result in the loss or gain of local and/ or strategic open space?		
7.5	Is the site close to landuse/s which may affect health and amenity?		
7.6	Is the site situated in an area which is in the 20% most deprived nationally when measured against the Index of Multiple Deprivation 2010?		
Objective 8: Sustainable Travel			
8.1	Is there direct access to the site from the public highway?		
8.2	Is the site within 1.6km of an existing designated cycleway?		
8.3	Is the site within 400m of a Railway station or bus stop that provides an hourly or more frequent bus service?		
Objective 9: Infrastructure Delivery and Availability			
9.1	Is the site reliant on the delivery of large scale/significant infrastructure to make it		

	deliverable?		
9.2	Is the nearest GP surgery currently accepting new patients?		
Objective 10: Land Use and Geology			
10.1	Is the site on previously developed land?		
10.2	Would development involve the reuse or redevelopment of derelict buildings?		
Objective 11: Minerals and Waste and Soil			
11.1	Is the site located on existing, known mineral reserves?*		
11.2	Is the site designated as a Regionally Important Geological site (RIGS)?		
11.3	Is the site on high quality grade agricultural land (1,2,3)		
Objective 12: Sustainable Economic Growth, Employment and Skills			
12.1	Is the site being promoted for greater or less business/ employment space?		
12.2	If the site is being promoted for business uses, does it have access to broadband?		
12.3	Does the proposal include an educational component/ learning opportunities?		
12.4	Would it help support sustainable tourism?		
Objective 13: Town and District Centre Vitality			
13.1	Is the site within 400m of the nearest district centre?		
13.2	Would the site contribute to the regeneration and revitalisation of Ashford town centre?		
13.3	Would the site result in the loss of shops/services?		
Conclusion:			Total:

* In accordance with the importance and weight encompassed in the NPPF, SA scoring could be overruled on sites that fall in the AONB, are in areas of highest flood risk, provide a substantial harm or total loss of a heritage asset or are found in a mineral safeguarding area.

Sustainability Appraisal Site Assessment Proforma

SCORE	Description	Illustrative Guidance for Biodiversity
2	<i>Significant positive</i>	<i>Would have a significant and sustained positive impact</i>
1	<i>Positive</i>	<i>Would have a minor positive impact</i>
0	<i>None - Neutral Effect</i>	<i>Would not have any known effects.</i>
-1	<i>Negative</i>	<i>Would have a minor short term (direct or indirect) negative effects.</i>
-2	<i>Significant Negative</i>	<i>Would have a strong negative and sustained effect.</i>

Objective	Site Assessment/ Screening Question (<i>prompt questions</i>)	COMMENTARY: Assessment of effects, mitigation, uncertainties, assumptions	SCORE										
Objective 1: Biodiversity													
1.1	<p>Is the site located within or adjoining a designated habitat? Would development of the site be likely to have a significant effect (direct or indirect) on a designated habitat because of the nature of development and proximity and sensitivities of the designated habitat.</p> <p>Are there opportunities for avoidance, mitigation or compensation?</p> <ul style="list-style-type: none"> • <i>Will it avoid adverse impacts on European and UK designated habitat and or/Kent or UK BAP habitats and species?</i> • <i>Will it create new habitats and improve the incidence and diversity of species?</i> • <i>Will it avoid adverse impacts on protected European sites and/or UK BAP habitats and species?</i> • <i>Is appropriate provision made for timely replacement habitat of at least equivalent size and value where impacts cannot be avoided?</i> 	<table border="1"> <tbody> <tr> <td>Would have a significant and sustained positive impact on European or national designated sites and/or protected species it creates new habitat on site and/or leads to a long term increase in population of designated species.</td> <td>2</td> </tr> <tr> <td>Would have a minor positive impact on European or national designated sites and/or protected species, it creates new habitat on site and/or leads to an increase in population of designated species.</td> <td>1</td> </tr> <tr> <td>Would not have any known impacts, as site not within or near a internationally /nationally designated site.</td> <td>0</td> </tr> <tr> <td>Would have a minor short-term (direct or indirect) negative impact on European or national designated sites through a minor increase in disturbance, partial habitat loss or minimal species loss.</td> <td>-1</td> </tr> <tr> <td>Would have a strong negative impact on European or national designated sites and/or protected species, it causes long term decrease in populations of designated species, extensive habitat loss and disturbance.</td> <td>-2</td> </tr> </tbody> </table>	Would have a significant and sustained positive impact on European or national designated sites and/or protected species it creates new habitat on site and/or leads to a long term increase in population of designated species.	2	Would have a minor positive impact on European or national designated sites and/or protected species, it creates new habitat on site and/or leads to an increase in population of designated species.	1	Would not have any known impacts, as site not within or near a internationally /nationally designated site.	0	Would have a minor short-term (direct or indirect) negative impact on European or national designated sites through a minor increase in disturbance, partial habitat loss or minimal species loss.	-1	Would have a strong negative impact on European or national designated sites and/or protected species, it causes long term decrease in populations of designated species, extensive habitat loss and disturbance.	-2	
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Would have a minor short-term (direct or indirect) negative impact on European or national designated sites through a minor increase in disturbance, partial habitat loss or minimal species loss.	-1												
Would have a strong negative impact on European or national designated sites and/or protected species, it causes long term decrease in populations of designated species, extensive habitat loss and disturbance.	-2												

1.2	<p>Would development of the site be likely to have significant on a Local Wildlife Site?</p> <ul style="list-style-type: none"> •Will it create new habitats and improve the incidence and diversity of species? •Will it avoid adverse impacts on Kent BAP habitats and species? •Is appropriate provision made for replacement habitat of at least equivalent size and value where impacts cannot be avoided? 	<table border="1"> <tr> <td data-bbox="1223 185 2114 280">Would have a significant and sustained positive impact on LWS and/or protected species it creates new habitat on site and/or leads to a long term increase in population of designated species.</td> <td data-bbox="2114 185 2215 280">2</td> </tr> <tr> <td data-bbox="1223 280 2114 376">Would have a minor positive impact on LWS and/or protected species it creates new habitat on site and/or leads to an increase in population of designated species.</td> <td data-bbox="2114 280 2215 376">1</td> </tr> <tr> <td data-bbox="1223 376 2114 416">Would not have any known impacts, as site not within or near a LWS.</td> <td data-bbox="2114 376 2215 416">0</td> </tr> <tr> <td data-bbox="1223 416 2114 512">Would have a minor short-term (direct or indirect) negative impact on LWS through a minor increase in disturbance, partial habitat loss or minimal species loss.</td> <td data-bbox="2114 416 2215 512">-1</td> </tr> <tr> <td data-bbox="1223 512 2114 608">Would have a strong negative impact on LWS and/or protected species, it causes long term decrease in populations of designated species, extensive habitat loss and disturbance.</td> <td data-bbox="2114 512 2215 608">-2</td> </tr> </table>	Would have a significant and sustained positive impact on LWS and/or protected species it creates new habitat on site and/or leads to a long term increase in population of designated species.	2	Would have a minor positive impact on LWS and/or protected species it creates new habitat on site and/or leads to an increase in population of designated species.	1	Would not have any known impacts, as site not within or near a LWS.	0	Would have a minor short-term (direct or indirect) negative impact on LWS through a minor increase in disturbance, partial habitat loss or minimal species loss.	-1	Would have a strong negative impact on LWS and/or protected species, it causes long term decrease in populations of designated species, extensive habitat loss and disturbance.	-2
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Would have a strong negative impact on LWS and/or protected species, it causes long term decrease in populations of designated species, extensive habitat loss and disturbance.	-2											
1.3	<p>Would development of the site result in the loss of key components in the habitat network, such as woodland, trees/hedgerows, wetland, ponds, streams and ditches or other features supporting protected species or biodiversity?</p> <ul style="list-style-type: none"> •Does the site contain TPOs? •Is it in or adjacent to Ancient Woodland? 	<table border="1"> <tr> <td data-bbox="1223 647 2114 687">Site does not result in the loss of key components in the habitat network</td> <td data-bbox="2114 647 2215 687">0</td> </tr> <tr> <td data-bbox="1223 687 2114 751">Site will cause minor loss of key components in the habitat network, or is adjacent/near to ancient woodland</td> <td data-bbox="2114 687 2215 751">-1</td> </tr> <tr> <td data-bbox="1223 751 2114 815">Site will cause the loss significant loss of key components in the habitat network. Or it affects Ancient Woodland</td> <td data-bbox="2114 751 2215 815">-2</td> </tr> </table>	Site does not result in the loss of key components in the habitat network	0	Site will cause minor loss of key components in the habitat network, or is adjacent/near to ancient woodland	-1	Site will cause the loss significant loss of key components in the habitat network. Or it affects Ancient Woodland	-2				
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Site will cause minor loss of key components in the habitat network, or is adjacent/near to ancient woodland	-1											
Site will cause the loss significant loss of key components in the habitat network. Or it affects Ancient Woodland	-2											
1.4	<p>Would development of the site enable the creation of new habitat and/or components in the habitat network?</p> <ul style="list-style-type: none"> •Will it enable managed access to natural areas? •Will it improve the green & blue linkages between existing and/or proposed areas of semi natural habitat and species-rich areas? (check Kent Biodiversity Opportunity Areas) 	<table border="1"> <tr> <td data-bbox="1223 887 2114 927">Site will improve linkages and enable managed access</td> <td data-bbox="2114 887 2215 927">2</td> </tr> <tr> <td data-bbox="1223 927 2114 967">Site will either improve linkages or will enable managed access</td> <td data-bbox="2114 927 2215 967">1</td> </tr> <tr> <td data-bbox="1223 967 2114 1007">Site will not improve linkages or enable managed access</td> <td data-bbox="2114 967 2215 1007">0</td> </tr> </table>	Site will improve linkages and enable managed access	2	Site will either improve linkages or will enable managed access	1	Site will not improve linkages or enable managed access	0				
Site will improve linkages and enable managed access	2											
Site will either improve linkages or will enable managed access	1											
Site will not improve linkages or enable managed access	0											
1.5	<p>Is the site located within or adjoining the Green Corridor?</p>	<table border="1"> <tr> <td data-bbox="1223 1110 2114 1150">No</td> <td data-bbox="2114 1110 2215 1150">0</td> </tr> <tr> <td data-bbox="1223 1150 2114 1190">Adjoining</td> <td data-bbox="2114 1150 2215 1190">-1</td> </tr> <tr> <td data-bbox="1223 1190 2114 1214">Yes within</td> <td data-bbox="2114 1190 2215 1214">-2</td> </tr> </table>	No	0	Adjoining	-1	Yes within	-2				
No	0											
Adjoining	-1											
Yes within	-2											
Objective 2: Landscape												
2.1	<p>Is the site within or in the setting of an Area of Outstanding Natural Beauty?</p>	<table border="1"> <tr> <td data-bbox="1223 1286 2114 1326">No</td> <td data-bbox="2114 1286 2215 1326">0</td> </tr> <tr> <td data-bbox="1223 1326 2114 1366">Adjoining/affect setting</td> <td data-bbox="2114 1326 2215 1366">-1</td> </tr> <tr> <td data-bbox="1223 1366 2114 1390">Yes within</td> <td data-bbox="2114 1366 2215 1390">-2</td> </tr> </table>	No	0	Adjoining/affect setting	-1	Yes within	-2				
No	0											
Adjoining/affect setting	-1											
Yes within	-2											

2.2	<p>Could development of the site respond effectively to the existing character and quality of the landscape/ townscape?</p> <ul style="list-style-type: none"> •Will the site's landuse and design have an impact on the setting of the designated landscape area? •Will it enhance landscape/townscape character? •Will it avoid adverse impacts on, and enhance, designated and non-designated landscape features? 	<table border="1"> <tr> <td data-bbox="1218 181 2114 248">Development of the site would have a significant positive impact on the landscape/townscape</td> <td data-bbox="2114 181 2222 248">2</td> </tr> <tr> <td data-bbox="1218 248 2114 316">Development of the site would have a minor positive impact on the landscape /townscape setting</td> <td data-bbox="2114 248 2222 316">1</td> </tr> <tr> <td data-bbox="1218 316 2114 352">Development of the site would have no impact on the landscape setting</td> <td data-bbox="2114 316 2222 352">0</td> </tr> <tr> <td data-bbox="1218 352 2114 419">Development of the site would have a minor negative impact on the landscape /townscape setting</td> <td data-bbox="2114 352 2222 419">-1</td> </tr> <tr> <td data-bbox="1218 419 2114 485">Development of the site would have a significant negative impact on the landscape/townscape</td> <td data-bbox="2114 419 2222 485">-2</td> </tr> </table>	Development of the site would have a significant positive impact on the landscape/townscape	2	Development of the site would have a minor positive impact on the landscape /townscape setting	1	Development of the site would have no impact on the landscape setting	0	Development of the site would have a minor negative impact on the landscape /townscape setting	-1	Development of the site would have a significant negative impact on the landscape/townscape	-2
Development of the site would have a significant positive impact on the landscape/townscape	2											
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Development of the site would have a minor negative impact on the landscape /townscape setting	-1											
Development of the site would have a significant negative impact on the landscape/townscape	-2											
2.3	<p>Would there be an identifiable and cumulative visual impact from the development of the site and related sites?</p> <ul style="list-style-type: none"> •Does it respond to and reinforce the topography of the area, view corridors and existing landscape features? •Will it avoid adverse impacts on visual amenity? 	<table border="1"> <tr> <td data-bbox="1218 493 2114 529">There would be a positive impact</td> <td data-bbox="2114 493 2222 529">1</td> </tr> <tr> <td data-bbox="1218 529 2114 566">No impact</td> <td data-bbox="2114 529 2222 566">0</td> </tr> <tr> <td data-bbox="1218 566 2114 603">There would be a negative impact</td> <td data-bbox="2114 566 2222 603">-1</td> </tr> </table>	There would be a positive impact	1	No impact	0	There would be a negative impact	-1				
There would be a positive impact	1											
No impact	0											
There would be a negative impact	-1											
Objective 3: Cultural Heritage and Archaeology												
3.1	<p>Is the site within or adjoining an area of archaeology importance or a conservation area?</p>	<table border="1"> <tr> <td data-bbox="1218 748 2114 785">Not within or adjoining</td> <td data-bbox="2114 748 2222 785">1</td> </tr> <tr> <td data-bbox="1218 785 2114 821">Adjoining</td> <td data-bbox="2114 785 2222 821">0</td> </tr> <tr> <td data-bbox="1218 821 2114 847">within</td> <td data-bbox="2114 821 2222 847">-1</td> </tr> </table>	Not within or adjoining	1	Adjoining	0	within	-1				
Not within or adjoining	1											
Adjoining	0											
within	-1											
3.2	<p>Does the site contain or does it adjoin a listed building, scheduled monument (SM) or Registered Park/ Garden?</p> <ul style="list-style-type: none"> •Does it respect, and where possible enhance, the character and setting of historic and archaeological assets including listed buildings, registered parks and gardens and scheduled monuments? 	<table border="1"> <tr> <td data-bbox="1218 884 2114 951">Site contains a listed building, scheduled monument or registered park or garden and has a significant positive impact on them.</td> <td data-bbox="2114 884 2222 951">2</td> </tr> <tr> <td data-bbox="1218 951 2114 1018">Site contains a listed building, scheduled monument or registered park or garden and has a minor negative impact on them.</td> <td data-bbox="2114 951 2222 1018">1</td> </tr> <tr> <td data-bbox="1218 1018 2114 1085">Does not contain a listed building, SM and is not in a CA or historic park or garden. Or has no impact on them.</td> <td data-bbox="2114 1018 2222 1085">0</td> </tr> <tr> <td data-bbox="1218 1085 2114 1152">Site contains a listed building, scheduled monument or registered park or garden and has a minor negative impact on them.</td> <td data-bbox="2114 1085 2222 1152">-1</td> </tr> <tr> <td data-bbox="1218 1152 2114 1219">Site contains a listed building, scheduled monument or registered park or garden and has a significant negative impact on them.</td> <td data-bbox="2114 1152 2222 1219">-2</td> </tr> </table>	Site contains a listed building, scheduled monument or registered park or garden and has a significant positive impact on them.	2	Site contains a listed building, scheduled monument or registered park or garden and has a minor negative impact on them.	1	Does not contain a listed building, SM and is not in a CA or historic park or garden. Or has no impact on them.	0	Site contains a listed building, scheduled monument or registered park or garden and has a minor negative impact on them.	-1	Site contains a listed building, scheduled monument or registered park or garden and has a significant negative impact on them.	-2
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Site contains a listed building, scheduled monument or registered park or garden and has a minor negative impact on them.	-1											
Site contains a listed building, scheduled monument or registered park or garden and has a significant negative impact on them.	-2											
3.2	<p>Will it respect and enhance the character and setting of Ashford's historic and/or cultural assets?</p> <ul style="list-style-type: none"> •Does it respect and enhance the character of conservation areas? •Will it help improve access to, and understanding of, historical and cultural assets? 	<table border="1"> <tr> <td data-bbox="1218 1227 2114 1264">Site will enhance the character and setting of Ashfords cultural assets</td> <td data-bbox="2114 1227 2222 1264">1</td> </tr> <tr> <td data-bbox="1218 1264 2114 1300">Will not affect or not applicable</td> <td data-bbox="2114 1264 2222 1300">0</td> </tr> <tr> <td data-bbox="1218 1300 2114 1337">Will negatively impact on the character and setting</td> <td data-bbox="2114 1300 2222 1337">-1</td> </tr> </table>	Site will enhance the character and setting of Ashfords cultural assets	1	Will not affect or not applicable	0	Will negatively impact on the character and setting	-1				
Site will enhance the character and setting of Ashfords cultural assets	1											
Will not affect or not applicable	0											
Will negatively impact on the character and setting	-1											

Objective 4: Water										
4.1	<p>Is the site wholly or partially in Flood Zone 2 or 3?</p> <ul style="list-style-type: none"> • Will it help to minimise the risk of flooding to existing and new developments/infrastructure and /or promote enhanced flood storage capacity/measures? • Is the site at risk of surface water flooding? <p>See O:\Working Groups\Ashford Water Group\Ashford SFRA - first review\FINAL Ashford SFRA - July 2014 Please use Appendix B constraints table and Appendix C summary sheet to get information, and check this against the GIS map (link in same file).</p>	<table border="1"> <tr> <td>Promotes enhanced flood storage capacity measures</td> <td>1</td> </tr> <tr> <td>Not in flood zone</td> <td>0</td> </tr> <tr> <td>In floodzone 2.</td> <td>-1</td> </tr> <tr> <td>In floodzone 2 and 3</td> <td>-2</td> </tr> </table>	Promotes enhanced flood storage capacity measures	1	Not in flood zone	0	In floodzone 2.	-1	In floodzone 2 and 3	-2
Promotes enhanced flood storage capacity measures	1									
Not in flood zone	0									
In floodzone 2.	-1									
In floodzone 2 and 3	-2									
4.2	Is the site at risk from Surface Water Flooding: from the 1 in 100-year event and/or from the 1 in 30-year event?	<table border="1"> <tr> <td>Not affected or applicable</td> <td>0</td> </tr> <tr> <td>in 1 in 100 yr flood zone</td> <td>-1</td> </tr> <tr> <td>In 1 in 30 yr floodzone</td> <td>-2</td> </tr> </table>	Not affected or applicable	0	in 1 in 100 yr flood zone	-1	In 1 in 30 yr floodzone	-2		
Not affected or applicable	0									
in 1 in 100 yr flood zone	-1									
In 1 in 30 yr floodzone	-2									
4.3	Is the site suitable to use SuDs infiltration systems?	<table border="1"> <tr> <td>Yes</td> <td>1</td> </tr> <tr> <td>No</td> <td>0</td> </tr> </table>	Yes	1	No	0				
Yes	1									
No	0									
4.4	<p>Is the site within a groundwater source protection zone?</p> <ul style="list-style-type: none"> • Will it maintain and improve ground and/or surface water quality? • Will it help reduce water consumption? 	<table border="1"> <tr> <td>Yes</td> <td>0</td> </tr> <tr> <td>No</td> <td>1</td> </tr> </table>	Yes	0	No	1				
Yes	0									
No	1									
Objective 5: Housing and Affordable Housing										
5.1	Does the site's size and proposed use meet the threshold for the provision of affordable housing? (currently over 15 units/ site area in excess of 0.5 ha)	<table border="1"> <tr> <td>Yes</td> <td>1</td> </tr> <tr> <td>No</td> <td>0</td> </tr> </table>	Yes	1	No	0				
Yes	1									
No	0									
Objective 6: Access to Services and Social Inclusion										
6.1	Will development of the site result in the loss or gain of onsite services and/ or facilities?	<table border="1"> <tr> <td>Gain of facilities</td> <td>1</td> </tr> <tr> <td>No impact on facilities</td> <td>0</td> </tr> <tr> <td>Loss of facilities</td> <td>-1</td> </tr> </table>	Gain of facilities	1	No impact on facilities	0	Loss of facilities	-1		
Gain of facilities	1									
No impact on facilities	0									
Loss of facilities	-1									
6.2	Is the site located in close proximity to a Local Centre/ Shop?	<table border="1"> <tr> <td>Less than 400m</td> <td>1</td> </tr> <tr> <td>400-800m</td> <td>0</td> </tr> <tr> <td>800-1.6km</td> <td>-1</td> </tr> <tr> <td>More than 1.6km</td> <td>-2</td> </tr> </table>	Less than 400m	1	400-800m	0	800-1.6km	-1	More than 1.6km	-2
Less than 400m	1									
400-800m	0									
800-1.6km	-1									
More than 1.6km	-2									

6.3	Is the site located in close proximity to a GP Surgery? • <i>Will it improve accessibility to GP facilities?</i> <i>http://www.nhs.uk/Service-Search</i>	Less than 400m	1
		400-800m	0
		800-1.6km	-1
		More than 1.6km	-2
6.4	Is the site located in close proximity to a Primary school?	Less than 400m	1
		400-800m	0
		800-1.6km	-1
		More than 1.6km	-2
Objective 7: Health and Wellbeing			
7.1	Is the site located in close proximity to public green open space? (could include informal Open Space, accessible by the Public. • <i>Will it increase accessibility to high quality, green open spaces?</i>	Less than 400m	1
		400-800m	0
		800-1.6km	-1
		More than 1.6km	-2
7.2	Is the site located in close proximity to an equipped play area? • <i>Will it improve accessibility to play spaces?</i>	Less than 400m	1
		400-800m	0
		800-1.6km	-1
		More than 1.6km	-2
7.3	Does the site have direct access to a footway (PROW or pedestrian pavement)? • <i>Would it encourage residents to make healthier lifestyle choices by increasing accessibility to shops, services and health facilities by foot?</i>	Less than 400m	1
		400-800m	0
		800-1.6km	-1
		More than 1.6km	-2
7.4	Would development result in the loss or gain of local and/ or strategic open space?	Gain of strategic and/or local open space	1
		No loss or gain of open space	0
		Loss of strategic and/or local open space	-1
7.5	Is the site close to landuse/s which may affect health and amenity? • <i>e.g. noise or light pollution?</i>	Not close to any	0
		Close to land use that could cause affect to health	-1
7.6	Is the site situated in an area which is in the 20% most deprived nationally when measured against the Index of Multiple Deprivation 2010?	Yes	1
		No	0

Objective 8: Sustainable Travel										
8.1	Is there direct access to the site from the public highway?	<table border="1"> <tr> <td>Yes</td> <td>1</td> </tr> <tr> <td>No</td> <td>0</td> </tr> </table>	Yes	1	No	0				
Yes	1									
No	0									
8.2	Is the site within 1.6km of an existing designated cycleway? <ul style="list-style-type: none"> • Will it encourage development in accessible locations that reduce the need to travel? • Will it create links between communities and the town/ district/ village centres? Use Systran Website	<table border="1"> <tr> <td>yes</td> <td>1</td> </tr> <tr> <td>no</td> <td>0</td> </tr> </table>	yes	1	no	0				
yes	1									
no	0									
8.3	Is the site within 400m of a Railway station or bus stop that provides an hourly or more frequent service? <ul style="list-style-type: none"> • Will it encourage the use of public transport? 	<table border="1"> <tr> <td>Yes</td> <td>1</td> </tr> <tr> <td>No</td> <td>0</td> </tr> </table>	Yes	1	No	0				
Yes	1									
No	0									
Objective 9: Infrastructure Delivery and Availability										
9.1	Is the site reliant on the delivery of large scale/significant infrastructure to make it deliverable?	<table border="1"> <tr> <td>Yes</td> <td>-1</td> </tr> <tr> <td>No</td> <td>0</td> </tr> </table>	Yes	-1	No	0				
Yes	-1									
No	0									
9.2	Is the nearest GP surgery currently accepting new patients? <ul style="list-style-type: none"> • check the following website, using the nearest available postcode to the site: http://www.nhs.uk/Service-Search 	<table border="1"> <tr> <td>Yes</td> <td>1</td> </tr> <tr> <td>No</td> <td>0</td> </tr> </table>	Yes	1	No	0				
Yes	1									
No	0									
Objective 10: Land Use and Geology										
10.1	Is the site on previously developed land? <ul style="list-style-type: none"> • Will it bring contaminated land back into use? • Is the site greenfield but could increased densities? 	<table border="1"> <tr> <td>Site brings brownfield contaminated back into use</td> <td>2</td> </tr> <tr> <td>Site brings brownfield or contaminated land back into use</td> <td>1</td> </tr> <tr> <td>Site is a greenfield site but could achieve increased densities</td> <td>0</td> </tr> <tr> <td>Site is greenfield</td> <td>-1</td> </tr> </table>	Site brings brownfield contaminated back into use	2	Site brings brownfield or contaminated land back into use	1	Site is a greenfield site but could achieve increased densities	0	Site is greenfield	-1
Site brings brownfield contaminated back into use	2									
Site brings brownfield or contaminated land back into use	1									
Site is a greenfield site but could achieve increased densities	0									
Site is greenfield	-1									
10.2	Would development involve the reuse or redevelopment of derelict buildings?	<table border="1"> <tr> <td>Yes</td> <td>1</td> </tr> <tr> <td>No</td> <td>0</td> </tr> </table>	Yes	1	No	0				
Yes	1									
No	0									
Objective 11: Minerals, Waste and Soil										
11.1	Is the site located on existing, known mineral reserves? http://consult.kent.gov.uk/portal/mwcs/mwlp-submission	<table border="1"> <tr> <td>No</td> <td>0</td> </tr> <tr> <td>Yes</td> <td>-1</td> </tr> </table>	No	0	Yes	-1				
No	0									
Yes	-1									

11.2	Is the site designated as a Regionally Important Geological Site (RIGS)? http://www.kentrigs.org.uk/	Yes	-1
		No	0
11.3	Is the site on high quality grade agricultural land (Grades 1, 2 and 3)	Not graded or grade 3	0
		In Grade 2	-1
		In Grade 1	-2
Objective 12: Sustainable Economic Growth, Employment and Skills			
12.1	Is the site being promoted for greater or less business/employment space? <ul style="list-style-type: none"> • Will it bring forward a range of employment and business uses/premises? • Will it improve the physical accessibility to jobs? • Would it help support rural businesses and/or generate local employment opportunities? 	Yes brings forward business units/ premises and generates significant employment	2
		Yes brings forward business units/premises or generates significant employment	1
		Has no impact on business unit/.premises provision and job generation	0
		Causes loss of business units/ premises or generates significant employment loss	-1
		Causes loss of business units/ premises and generates significant employment loss	-2
12.2	If the site is being promoted for business uses, does the site have access to broadband?	*Scoring below may change if it is possible to find out download speeds.	
		Yes	1
		No / Not known	0
12.3	Does the proposal include an educational component/ learning opportunities? <ul style="list-style-type: none"> • Will it bring forward educational/ learning institutions? 	Yes	1
		No	0
12.4	Would it help support sustainable tourism?	Yes	1
		No	0
Objective 13: Town and District Centre Vitality			
13.1	Is the site within 400m of the nearest district centre? <ul style="list-style-type: none"> • This should include nearest large village. • Does it promote a mix of uses which will help generate and maintain vitality in the town centre? • Does it help reinforce Ashford/ Tenterden's role in the retail hierarchy? 	yes	1
		no	0

13.2	Would the site contribute to the regeneration and revitalisation of Ashford town centre?	yes	1
		No/ not applicable	0
13.3	Would the site result in the loss of shops/services? • <i>This should include nearest large village.</i>	No	0
		Yes	-1
Conclusion			

Annex 3

Employment by occupation (October 2011 – September 2012)

	Ashford (numbers)	Ashford (%)	South East (%)	Great Britain (%)
Soc 2010 major group 1-3	23,100	42.4	48.2	43.7
1 Managers, directors and senior officials	7,600	13.9	11.7	10.1
2 Professional occupations	8,100	14.9	20.8	19.2
3 Associate professional & technical	7,400	13.6	15.5	14.2
Soc 2010 major group 4-5	13,600	25.0	21.0	21.7
4 Administrative & secretarial	5,300	9.7	11.0	10.9
5 Skilled trades occupations	8,400	15.3	10.0	10.7
Soc 2010 major group 6-7	7,300	13.3	17.0	17.3
6 Caring, leisure and Other Service occupations	4,100	7.5	9.0	9.0
7 Sales and customer service occs	#	#	7.9	8.2
Soc 2010 major group 8-9	10,500	19.3	13.8	17.3

8 Process plant & machine operatives	4,000	7.3	4.4	6.3
9 Elementary occupations	6,500	11.9	9.4	10.9

Sample size too small for reliable estimate
Notes: Numbers and % are for those of 16+
% is a proportion of all persons in employment

SOC 2000 Major groups

1. Managers and senior officials
2. Professional occupations
3. Associate professional and technical occupations
4. Administrative and secretarial occupations
5. Skilled trades occupations
6. Personal service occupations
7. Sales and customer service occupations
8. Process, plant and machine operatives
9. Elementary occupation

General Health & Long Term Health.

General Health (Census 2011)	Ashford	South East
Very Good	47.6%	49%
Good	35%	34.6%
Fairly Good	12.74%	12.01%
Bad Health	7.2%	7.1%

Very Bad	1.06%	0.96%
Long Term Health problem or Disability		
Day-to-Day Activities Limited a Lot	7.1%	6.7%
Day-to-Day Activities Limited a Little	9%	8.8%
Day-to-Day Activities Not Limited	83.8%	84.2%

Definitions

Local Unit

This is a statistical unit in an enterprise, defined by [European Regulation 696/93](#) as the individual site (shop, factory, etc) situated in a geographically identified place. At a local unit, economic activity is carried out by one or more persons (even if only part-time) working for one and the same enterprise.

Enterprise

This is a statistical unit, defined by [European Regulation 696/93](#) as the smallest group of legal units (generally based on VAT or PAYE) within an enterprise group (where one exists) that have a certain degree of autonomy or control. An enterprise is essentially a business. It is generally located at the main operating site or the head office. For small businesses the head office and the operations often will be at the same address. For larger businesses, for example a supermarket chain with several hundred shops across the UK, the head office is likely to be in London or another large city and the operational units (local units or sites) will be at numerous addresses throughout the country.

Urban / Rural Area

Each Census Output Area in England and Wales has been allocated to a settlement type and a sparsity score which in combination provide up to 8 classes of Urban / Rural Area classification:

1. Urban > 10k – Sparse
2. Town and Fringe – Sparse
3. Village – Sparse
4. Hamlet & Isolated Dwelling – Sparse
5. Urban > 10k – Less Sparse
6. Town and Fringe – Less Sparse
7. Village – Less Sparse
8. Hamlet & Isolated Dwelling – Less Sparse

For this dataset Rural is defined as area codes 2, 3, 4, 6, 7 and 8.

VAT Based Enterprises by Broad Industry Group: Rural, 2007

	Ashford	South East
	Non-Metropolitan	Region

	District	
All VAT Based Enterprises	2355	89260
Rural; Agriculture	14.9	9.6
Rural; Production	7.9	7.3
Rural; Construction	13	12.6
Rural; Motor Trades	4.2	4
Rural; Wholesale	6.6	6
Rural; Retail	7.6	6.9
Rural; Hotels & Catering	4.9	4.9
Rural; Transport	3.6	2.9
Rural; Post & Telecommunications	0.6	0.7
Rural; Finance		
	0.8	0.4
Rural; Property & Business Services	28	33.9
Rural; Education	0.4	0.9
Rural; Health	0.4	0.6
Rural; Public Admin & Other Services	7	9.4

Annex 4 – Consultation Letters and Responses (Statutory Consultees)

Planning and Development Services

Ask For: Planning Policy
Email: planningpolicy@ashford.gov.uk
Direct Line: (01233) 330213
Fax No: (01233) 330682



ASHFORD
BOROUGH COUNCIL

Civic Centre
Tannery Lane
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Kent TN23 1PL
(01233) 331111
Typetalk (01233) 330744
www.ashford.gov.uk
DX 151140 Ashford (Kent) 7

2nd July 2013

Dear Sir/ Madam

Re: Sustainability Appraisal Scoping Report

Please see attached the Sustainability Appraisal Scoping Report for Ashford Borough Council's new Local Plan to 2030.

This report has been issued to all three statutory consultees for consultation. I would be grateful if you could return any comments to the Planning Policy team at the address above, or by email to planningpolicy@ashford.gov.uk, by **Friday 16th August 2013**.

Should you have any queries, then please do not hesitate to contact one of the team on 01233 330213.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'S. Cole'.

Simon Cole
Policy Manager



From: Sue Fairhurst
Sent: 02 July 2013 11:09
Subject: Sustainability Appraisal Scoping Report

Dear Sir / Madam,

Please see attached the Sustainability Appraisal Scoping Report for Ashford Borough Council's new Local Plan to 2030.

This report has been issued to all three statutory consultees for consultation. I would be grateful if you could return any comments to the Planning Policy team by **Friday 16th August 2013**.

You can either respond by email to planningpolicy@ashford.gov.uk or by post to: Planning Policy, Ashford Borough Council, Civic Centre, Tannery Lane, Ashford, Kent TN23 1PL.

Should you have any queries, then please do not hesitate to contact one of the team on 01233 330213.

Kind regards,

Sue Fairhurst | Planning Policy Support Assistant | Ashford Borough Council
Tel: 01233 330229 | Fax: 01233 330682 | E-mail: sue.fairhurst@ashford.gov.uk

<http://www.ashford.gov.uk/planning-and-building-control>

From: Lister, John (NE) [mailto:John.Lister@naturalengland.org.uk]
Sent: 13 August 2013 12:40
To: Sue Fairhurst
Cc: Sue Fairhurst
Subject: Sustainability Appraisal Scoping Report

Dear Susan

Thank you for consulting Natural England on your Scoping Report.

We welcome the document and have a limited number of comments which are as follows:

- Table 3 sets out designated landscapes and habitats in the Borough, and paragraph 2.2.16 begins to flag N2K sites beyond the plan boundary. A number of your neighbouring LPAs are currently considering significant new housing allocations that are likely to have a significant effect on N2K sites. It is essential that the impact of further development allocations in Ashford are considered in combination with the effects of potential allocations elsewhere. Given the special attractions of the coast, particular regard needs to be given to recreational disturbance on N2K sites in these areas. *- for Appropriate Assessment*
- The information in Table 4 is important in considering direct and indirect impact on SSSIs arising from development (see NPPF para 118).
- Natural England's work on the National Character Areas may be of helpful in informing work on your plan. Your Borough is covered by the following NCAs: *- Add to Scoping Report*
 - The North Kent Plan (a small part)
 - http://www.naturalengland.org.uk/publications/nca/north_kent_plain.aspx
 - North Downs
 - http://www.naturalengland.org.uk/publications/nca/north_downs.aspx
 - Wealden Greensand

- http://www.naturalengland.org.uk/publications/nca/wealden_greensand.aspx
- Low Weald
- http://www.naturalengland.org.uk/publications/nca/low_weald.aspx
- High Weald
- http://www.naturalengland.org.uk/publications/nca/high_weald.aspx
- Romney Marshes
- http://www.naturalengland.org.uk/publications/nca/romney_marshes.aspx
- Issue 7 in Table 15 should clarify that this includes the protection, provision and enhancement of key habitats and linkages, to sustain the local habitat network. – *add.*
- The suggested indicators for Biodiversity in the Draft Sustainability Framework, should consider loss of habitats, corridors and stepping stones and also the nature and scale of development with a likely significant effect on N2k sites (and similarly for SSSI) that may arise from the new plan. – *add.*
- In the Site Assessment Proforma, reference to “international” sites should be made under 1.1, and to “features that support Protected Species or BAP habitat” under 1.3 – *add*

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing and commenting on your Report. Nevertheless, I hope you find these comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.

I append a form should you wish to comment on the service we provide.

<<Natural England Consultation Feedback(v3)_pub_0001.pdf>>

(Yours sincerely

John Lister

Lead Adviser

Planning and Development Services

Ask For: Planning Policy
Email: planningpolicy@ashford.gov.uk
Direct Line: (01233) 330229
Fax No: (01233) 330682



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31st July 2014

Dear Sir/ Madam

Sustainability Appraisal (SA) – amended Framework and Pro Forma assessment form

As one of the Statutory [Consultees](#) for planning, we consulted you in July 2013 regarding the Sustainability Appraisal Scoping Report for Ashford Borough Council's new Local Plan to 2030. We would like to take this opportunity to thank you for taking time to read the document and respond if you considered appropriate.

Following a further year of work on the Local Plan, it has been identified that the SA Framework and assessment pro-forma table we were proposing to use to assess sites should be updated to reflect the most recent guidance and to ensure it provides maximum clarity and consistency.

Therefore, please find enclosed a new Sustainability Framework (showing tracked changes) and the updated SA pro-forma table which we hope you will have time to read and comment on. The new Framework and pro forma assessment forms should be read in conjunction [with](#) the original SA scoping report (also attached) as they reflect only minimal changes and still capture the original SA objectives based on the findings of the baseline study.

We would be grateful if you could return any comments you have to the Planning Policy team at the address above, or by email to planningpolicy@ashford.gov.uk, by **Friday 12th September 2014**.

Yours faithfully,



Simon Cole
Policy Manager

Sent from John.lister@naturalengland.org.uk to planningpolicy@ashford.gov.uk on 10/09/2014

Dear Planning Team

Thank you for consulting Natural England on this matter.

I have focussed on Objectives 1 and 2 and drawn columns from the SA and the site assessment document to allow comparison. I have made some minor deletions and some additions in red.

No. Site Assessment/ Screening Question Prompts from SA Framework

Objective 1: Biodiversity

1.1 Is the site located within **or adjoining a designated habitat, or an area used by protected species.**

Would development of the site be likely to have a significant effect (direct or indirect) on a designated habitat because of the nature of development and the proximity and sensitivities of the designated habitat

Are there opportunities for avoidance, mitigation or compensation.

~~100m of a nationally designated site? (SSSI, National Nature Reserve, Special Area of Conservation) —~~

- Will it avoid adverse impacts on ~~protected~~ **and UK designated habitat** sites and/or Kent or UK BAP habitats and species?
- Will it create new habitats and improve the incidence and diversity of species?
- Will it enable managed access to natural areas?
- Will it improve the green & blue linkages between existing and/or proposed areas of semi natural habitat and species-rich areas?
- Is appropriate provision made for **timely** replacement habitat of at least equivalent size and value where impacts cannot be avoided?

1.2 **Would development of the site be likely to have significant effect on** ~~Is the site located within 100m of a Local Wildlife Site?~~

1.3 Would development of the site result in the loss **of key components in the habitat network, such as woodland, trees/hedgerows, wetland, ponds, streams and ditches or other features supporting protected species or biodiversity?**

1.4 Would development of the site enable the creation of new habitat and/or **components in the habitat network** ~~green linkages?~~

1.5 **Does the site present opportunities for protecting and enhancing** ~~Is the site located within or adjoining the green corridors?~~

Objective 2: Landscape

2.1 Is the site within or ~~adjoining~~ **in the setting of** an Area of Outstanding Natural Beauty? ▪ Will it respect the existing character and quality of the landscape/ townscape?

- Does it respond to and reinforce the topography of the area, view corridors and existing landscape features?
- Will it avoid adverse impacts on, and enhance, designated and non-designated landscape features?
- Will it enhance landscape/townscape character?

2.2 **Could** development of the site ~~respect~~ **respond effectively to** the existing character and quality of the landscape/ townscape?

2.3 Would there be an identifiable and cumulative visual impact from the development **of the site and related sites**?

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing and commenting on the submitted documents. However I hope these first thoughts meet your needs and are helpful. If not or if further conversation would be helpful, please give me a call.

If there are issues I have not covered, please let me know and I will respond as quickly as possible.

If you wish to comment on the service provided by Natural England please use the appended form.

<<Natural England Consultation Feedback(v4)_pub_0001 (2).pdf>>

Yours sincerely

John Lister

Lead Adviser

Kent, West Sussex, East Sussex Team (Area 14)

Natural England

Mobile - 0790 060 8172

www.naturalengland.org.uk

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings but attend via audio, video or web conferencing.

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Annex 5 – How Natural England’s comments were taken into account in updating the site assessment form and guidance note.

(NE requested additions in red and removals crossed out. Council response in blue.)

No. Site Assessment/ Screening Question Prompts from SA Framework

Objective 1: Biodiversity

1.1 Is the site located within ~~or adjoining a designated habitat, or an area used by protected species.~~ Question changed in relation to designated habitat. However with regard to protected species, this is covered by question 1.3, therefore has not been changed.

~~Would development of the site be likely to have a significant effect (direct or indirect) on a designated habitat because of the nature of development and the proximity and sensitivities of the designated habitat~~ Additional question added to guidance.

~~Are there opportunities for avoidance, mitigation or compensation.~~ Additional question added to guidance.

~~100m of a nationally designated site? (SSSI, National Nature Reserve, Special Area of Conservation) —~~

▪ Will it avoid adverse impacts on ~~protected~~ European ~~and UK designated habitat~~ sites and/or Kent or UK BAP habitats and species? Question changed in guidance

▪ Will it create new habitats and improve the incidence and diversity of species?

▪ Will it enable managed access to natural areas? Covered in 1.4

▪ Will it improve the green & blue linkages between existing and/or proposed areas of semi natural habitat and species-rich areas? Covered in 1.4

▪ Is appropriate provision made for ~~timely~~ replacement habitat of at least equivalent size and value where impacts cannot be avoided? Question changed

1.2 ~~Would development of the site be likely to have significant effect on~~ ~~Is the site located within 100m of a~~ Local Wildlife Site? Question changed

1.3 Would development of the site result in the loss ~~of key components in the habitat network, such as woodland, trees/hedgerows, wetland, ponds, streams and ditches or other features supporting protected species or biodiversity?~~ ????

1.4 Would development of the site enable the creation of new habitat and/or ~~components in the habitat network~~ ~~green linkages?~~ Question changed

1.5 ~~Does the site present opportunities for protecting and enhancing~~ ~~Is the site located within or adjoining~~ the green corridors? Question not changed. This question relates specifically to the Ashford Borough existing Green Corridor and not green corridors more generally. Opportunities for protecting and enhancing is considered to be covered by questions 1.3 and 1.4.

Objective 2: Landscape

2.1 Is the site within or ~~adjoining~~ ~~in the setting of~~ an Area of Outstanding Natural Beauty? Question changed

▪ Will it respect the existing character and quality of the landscape/ townscape?

▪ Does it respond to and reinforce the topography of the area, view corridors and existing landscape features?

▪ Will it avoid adverse impacts on, and enhance, designated and non-designated landscape features?

▪ Will it enhance landscape/townscape character?

2.2 ~~Could~~ development of the site ~~respect~~ ~~respond effectively to~~ the existing character and quality of the landscape/ townscape? Question changed

2.3 Would there be an identifiable and cumulative visual impact from the development of the site and related sites? Question changed

Annex 6 – Changes to site assessment forms due to difficulties with sourcing information

Original Question	Explanation
8.4 Is the site located in an Air Quality Management Area	There are no AQMAs in the Borough, therefore this does not provide differentiation between sites.
9.2 Does the local road network have suitable capacity to provide for the site?	Information regarding road capacity for individual site proposals not available at the time of assessment. Consultation with KCC Highways and Transportation has taken place at a later date, and was taken into consideration when making the final decision whether to include the site for allocation.
9.3 Is there adequate capacity in the local sewer network to provide for the site?	Following consultation with Southern Water, this information was not available at the individual site level. Southern Water provided information on broad areas, such as individual villages, which has not been a determining factor in site allocations.
9.4 Is there adequate primary school place provision at the nearest primary school to the site?	Not considered to be an appropriate question due to the way in which school catchments work across the Borough, and parent choice on school selection. Where there isn't capacity development may be able to bring forward increases in capacity. At a village level the scoring will be the same for all sites.

From: COATES, Jennifer [mailto:Jennifer.Coates@english-heritage.org.uk]
Sent: 02 July 2013 14:19
To: Sue Fairhurst
Cc: HAIGH, Lesley
Subject: Sustainability Appraisal Scoping Report

Dear Susan,

Thank you for your e-mail regarding sustainability appraisal scoping report, this has been passed on to a specialist. For future reference please could you ensure you send these through to our e-consultation email address, to ensure that your consultation is picked up quickly.

More information on how to consult us through e-consultation can be found here
<http://www.english-heritage.org.uk/professional/advice/our-planning-role/charter/e-planning/>

I have also copied below our standard e-mail regarding e-consultations should you wish to set up an arrangement with us. I hope this will be of some help to you:

'Please note that requests for comments from English Heritage as a statutory consultee should not be sent to the general SE email address nor to individual staff emails and will not be actioned.

As yet we do not have an agreement with you to formally receive e-consultations. However, we are now in the position of being able to provide a single dedicated email address to formally receive e-consultations from LPAs; previously we have had an informal agreement with your local authority and have accepted cover letters (both paper and electronic) as formal request for our comments as a statutory consultee.

We have adopted a set of standards for e-consultation and consider applications using these standards as a genuine invitation to give advice, as detailed in ODPM Circular 08/2005. May I refer you to the following webpage (<http://www.english-heritage.org.uk/professional/advice/our-planning-role/charter/e-planning/>) detailing our e-planning charter.

If you feel that your e-consultations meet the requested standards, we would be happy to enter into negotiations for receiving further emails. It may be that your authority's website is already set up using the core standards and will require very little alteration.

You will understand we receive consultations from all LPAs across the south east, all of which are at varying stages of e-planning. Now that we are able to provide a single email address, we can move to formally agree how we receive e-consultations from each LPA so that this is an effective process for all involved. This is a request to actively enter into a positive exchange to try to

1

eliminate problems further sooner rather than later. We are seeking to enter into this process with all LPAs with the hope to establish a smooth means of communication for all parties.

Until we have agreed a formal e-consultation process I would be grateful if you could continue to request our comments by letter. I hope that this is a helpful and look forward to hearing from you shortly.

Regards

Simon Goodhugh
Business Manager

Tel: 01483 252037
simon.goodhugh@english-heritage.org.uk