Ashford Borough Council

Soundness Self-Assessment
December 2017

This soundness compliance self-assessment checklist was produced by the Planning Advisory Service (PAS) in March 2014. Ashford Borough Council has completed this checklist to demonstrate that the Local Plan meets the tests of soundness as set out in the relevant legislation.

In summary – the key requirements of plan preparation are:

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

The Tests of Soundness at Examination

The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): "The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is 'sound' ", namely that it is:

1. **Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements**

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

2. **Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence**

This means that the DPD should be based on a robust and credible evidence base involving:

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help

to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

This means the DPD should be deliverable, requiring evidence of:
- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

4. Consistent with national policy: enabling the delivery of sustainable development

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy www.planningportal.gov.uk). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

The Duty to Co-operate will also be assessed as part of the examination process.

Soundness Test and Key Requirements	Evidence Provided
Positively Prepared: *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.*	

Soundness Test and Key Requirements	Evidence Provided
Vision and Objectives Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve? Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives? Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? Are the policies internally consistent? Are there realistic timescales related to the objectives? Does the DPD explain how its key policy objectives will be achieved?	The introduction section in to the Local Plan sets out the borough's institutional, policy and legislative context which informs the Plan. Priorities, derived from the Council's Corporate Plan, are clearly set out under four key outcomes: 1. Enterprising Ashford; 2. Living Ashford; 3. Active & Creative Ashford; and 4. Attractive Ashford. The Local Plan is the main vehicle for the delivery of this Plan. The Vision for Ashford Borough, which is locally specific and influenced by identified key local issues, is clearly set out in Chapter 3. Each criterion of Policy SP1 responds to this vision, and it is clearly explained how the Local Plan policies will address local issues to achieve these priorities and outcomes in order to successfully implement the identified Vision within the supporting text. Reasonable alternatives to the quantum of development and the overall spatial strategy have been considered in the Sustainability Appraisal, which was made available for public consultation, and in the Housing Topic Paper. Alternative options for the strategic approach to employment have been assessed within the Employment Land site assessments 2016 and the Strategic Employment Options Report 2012. These form Background Evidence Papers. Policies contained within the Local Plan are considered to be internally consistent, and the Sustainability Appraisal report has considered the cumulative impacts of the policies and how the policies relate to each other. The Local Plan sets clear timescales for delivery of objectives and is supported by an Infrastructure Delivery Plan which supports the delivery of sites. With regards to the provision of quality housing, the SHELAA includes a delivery trajectory which is updated annually. The Local Plan explains how its key policies will be achieved throughout, from establishing the strategic measures in Chapter 3, site-specific requirements throughout Chapter 4, and topic requirements through Chapter 5. There is an explicit focus on implementation in Chapter 5, Section F, which emphasises the cross-party cooperation necessary and the substantial work that has already taken place in this regard. There is also an option to review the plan in any case by 2025. The Monitoring section in the Appendix also details how policies and outcomes will be measured to ensure

Soundness Test and Key Requirements	Evidence Provided
	compliance, with Annual Monitoring Reports to assess delivery. Confirmation from relevant agencies that they support the objectives and identified means of delivery are detailed in the Consultation Statements, and the methodology for cooperation in the Duty to Cooperate statement.
The presumption in favour of sustainable development (NPPF paras 6-17) Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or —specific policies in this Framework indicate development should be restricted.	The Local Plan to 2030 is supported by a robust evidence base, which has identified the needs of the borough and has been used to inform the overall strategy and develop more detailed policies. The SA has also been used to support the selection of options for policies and site allocations. The Plan has met its full OAHN with suitable allowances provided to ensure that there is a flexible and responsive supply of development land. Policy SP1 'Strategic Objectives' ensures Sustainable Development, and sets out the presumption in favour of this, as included in the National Planning Policy Framework. This, and the plan in general, recognise the diversity across this borough, but is articulated to ensure the different parts work together for a sustainable whole. In addition, the Implementation Chapter, Infrastructure Delivery Plan and Monitoring Framework set out those monitoring requirements and contingency measures required to address and potential changes.
Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.	The plan aligns itself with the NPPF in adopting a presumption in favour of sustainable development. It seeks to achieve balanced social, economic and environmentally balanced development. Policy SP1 specifically provides the parameters for this, and all policies – which are universally positively worded – speak to its aims.

Soundness Test and Key Requirements	Evidence Provided
Objectively assessed needs The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	The local plan is built upon a robust evidence base. This identifies the needs of the borough and has been used to inform the overall strategy and develop more detailed policies. The Strategic Housing Market Assessment (2014 and 2015), and the Strategic Housing Market Assessment Update (2017) contain the objectively assessed housing needs for the borough. The Employment Land Review (2016) provides evidence of the need for employment related development and land allocations within the Borough, and the Ashford Retail and Leisure Needs Assessment (2015) establishes need in relation to retail and leisure development. A full list of the technical studies and reports that for the evidence base for the plan is provided. The Duty to Cooperate Statement sets out the Council's engagement with adjacent authorities and other stakeholders and how cross-boundary issues have been identified and considered. This collaboration, in agreement with those key parties, has concluded that the borough can meet its own development requirements in full without reliance on adjoining areas and vice versa.

NPPF Principles: Delivering sustainable development		
1. **Building a strong, competitive economy (paras 18-22)**		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	The Plan contains a clear positive vision and strategy for economic development in the borough based on the area's economic strengths and opportunities. Strategic Policy SP3 sets out the strategic approach to economic development and how this will be achieved through the Local Plan. This is complemented by Strategic Policies SP4 and 5 which address the retail aspects of economic development with particular focus on Ashford town centre as the borough's economic and commercial hub. The vision and strategy are informed in conjunction with the South East Local Economic Partnership, along with evidence taken from a number of more locally-specific studies. The Employment Land Review has assessed the current and future demand for employment land and has identified the capacity of supply needed to meet these projections.	

Soundness Test and Key Requirements	Evidence Provided
	Section B: 'Employment and the Local Economy' Policies EMP1 –EMP11 set out specific aims for local area which reflect the overall vision and which seek to encourage economic growth. Policies EMP1-5, in particular, seek to ensure that the Local Plan provides sufficient employment land to support economic growth in the borough. The Plan recognises the diversity of employment offer in the borough, and the variety of settlements to which these activities relate.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	The Plan aims to preserve and enhance the rural hinterland of the borough that enables an attractive and prosperous rural economy, while identifying those barriers that limit it reaching its full potential, and highlighting threats to changing ways of working. One of the key modern infrastructure limitations in the borough is access to high speed broadband. Policy EMP6 with promotes Fibre to the Premises (FTTP) is a cornerstone of the Council's approach, and will allow existing urban and, in particular, rural communities to engage in an increasingly dynamic and global economy. The Infrastructure Delivery Plan sets outs the infrastructure which will be delivered to support the strategy contained in the Local Plan. Delivery of the Plan is in many cases contingent on significant strategic infrastructure – most notably a new motorway junction on the M20, but the Council is confident in its delivery potential.
2. Ensuring the vitality of town centres (paras 23-37)	
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	The strategic approach to employment delivery is set out in strategic policies SP3 and SP4. Policies EMP7-10 reinforce the economic hierarchy across the borough between its settlements. As in previous plans, Ashford town centre is to be reinforced as the hub and efforts made to retain its critical number of services, with Tenterden as the borough's second town. Policy EMP9 requires that sequential tests are carried out for town centre uses proposed elsewhere, and other policies respond to the potential loss of employment premises.
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial,	The retail and leisure requirements of the Plan are informed by the Ashford Retail and Leisure Needs

Soundness Test and Key Requirements	Evidence Provided	
office, tourism, cultural, community services and residential development needed in town centres (23)	Assessment (2015), which provided evidence relating to the role of the Borough's centres and the scope for future retail and leisure development. The Employment Land Review provided an assessment of the need for future employment developments including office space. These reports form part of the evidence base that has informed the allocations within the Local Plan and did not identify suitable allocations within the Centres. Policy EMP7 defines Primary and Secondary shopping frontages for Ashford town; Policy EMP8 does the same for Tenterden; while EMP10 provides a positive policy for the enhancement of services in Primary and Secondary villages.	
3. **Supporting a prosperous rural economy (para 28)**		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	Policies EMP3-5 specifically address economic growth and development in rural areas. These are positive policies outlining extensions to rural employment premises; conversions of rural buildings to non-residential uses; and new employment provision in the countryside. Allied to this is the allocation of proportionate housing development sites in rural settlements to enable more affordable accommodation in the rural area and enhance the sustainability of rural areas. The Rural Economic Assessment (2014) forms part of the Local Plan 2030 evidence base and assesses the likely growth of the rural economy to 2030. In addition it identifies locations within rural Ashford that are capable and suitable for accommodating jobs and industry to support the growth of the local economy. One of the key modern infrastructure limitations in rural areas is access to high speed broadband. Policy EMP6 with promotes Fibre to the Premises (FTTP) is a cornerstone of the Council's approach, and will allow existing urban and, in particular, rural communities to engage in an increasingly dynamic and global economy.	
4. **Promoting sustainable transport (paras 29-41)**		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of	Securing sustainable transport is at the heart of this Plan and has been a constant consideration in its production. Chapter 5, Section C outlines the vision for sustainable transport in the borough.	

Soundness Test and Key Requirements	Evidence Provided
sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29) Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30) Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31) Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32) Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34) Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35) Policies should aim for a balance of land uses so that people can be encouraged to minimize	Policy TRA1 highlights the major infrastructure fundamental in delivering the plan – namely the new Junction 10a Motorway junction; improvements to the A28, and town centre ring road improvements. This has been formulated in conjunction with a number of partner bodies (including Kent CC; Highways England; and the South East LEP). Funding is in place and project plans/implementation are well advanced for all of these items; while the Secretary of State issued the DCO for the Motorway Junction in December 2017. Background documentation presents evidence of feasibility for other strategic infrastructure linked with the delivery of specific sites. TRA2, following the recommendations of the Town Centre Parking Review (2014) builds in the need for additional public parking facilities. The 2015 Written Statement: Planning Update directed Local Planning Authorities to "only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network". This has led to a retreat in maximum parking standard; however there is a recognised need to ensure sufficient parking is integrated into development in suburban and rural areas; and to avoid downstream impacts from employment parking. Policies TRA3a and TRA3b address these issues respectively. Notwithstanding changes in the national approach to the private car, the principles of sustainability are upheld through Policies TRA4-6, which ensure development is planned to incorporate bus, pedestrian and cycling provision. Policy TRA7 sets out the local road hierarchy, incorporating the evidence in the Traffic Impact Assessment (Reviewed in 2016). Site allocations have been made in the most sustainable locations. To ensure transport issues are at the forefront of decision making, Policy TRA8 requires a Transport Statement, Assessment of Plan (as appropriate) for major applications. The impact of HGVs has been taken into account in Policy TRA9, while Policy ENV12 requires applicants to consider air quality and the cumulative impact of emissions.

Soundness Test and Key Requirements	Evidence Provided	
journey lengths for employment, shopping, leisure, education and other activities. (37)

For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)

The setting of car parking standards including provision for town centres. (39-40)

Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41) | The Plan seeks to deliver a number of large residential developments. These will be located in areas either close to existing work, leisure and shopping uses, or will seek to incorporate them within the scheme. | |
| 5. **Supporting high quality communications infrastructure (paras 42-46)** | | |
| Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)

Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44) | One of the key modern infrastructure limitations in rural areas is access to high speed broadband. Policy EMP6 promotes Fibre to the Premises (FTTP) is a cornerstone of the Council's approach, and will allow existing urban and, in particular, rural communities to engage in an increasingly dynamic and global economy. | |

Soundness Test and Key Requirements	Evidence Provided
6. Delivering a wide choice of high quality housing (paras 47-55)	
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	The Local Plan achieves the objectives of paragraph 47 of the Framework. A fuller explanation of housing delivery is set out in the Housing Topic Evidence Paper that supports the Plan.

A realistic windfall supply is expected as outlined in Policy HOU3a, and windfall is considered suitable in sustainable settlements as identified within that policy. |
| Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47). | The Local Plan has allocated sufficient developable sites to meet identified housing needs for years 6- 10 and 11-15. This is evidenced in the SHELAA and the Housing trajectory. |
| Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47) | The Local Plan includes a Housing trajectory within its appendices, indicating when housing development is expected to be delivered.

Policy SP2 establishes the Council's approach to housing delivery, its numbers required, and means of meeting the five year housing land supply. This is supported by the Housing Topic Evidence Paper, the Five Year Housing Land Supply Assessment and SHELAA.

The Authority Monitoring Report includes information relating to the monitoring of completions and permissions and a housing trajectory illustrating the expected rate of housing delivery.

The SHELAA is regularly updated to ensure that a 5 year supply of housing land is maintained. |
| Set out the authority's approach to housing density to reflect local circumstances (47). | Indicative density requirements are outlined in site allocation policies and supporting text, where applicable and appropriate to do so to ensure an appropriate balance between local character & design and viability & aspiration.

Elsewhere, this issue is more usefully covered by Policy SP6 which requires high quality design that is |

Soundness Test and Key Requirements	Evidence Provided
	appropriate to place; and HOU18 which requires a mix of development.
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	Policy HOU18 identifies the type and mix of housing which development will be expected to provide. Proposals will be expected to contribute to meeting social housing requirements, market housing demand and specialist housing needs as indicated in the Strategic Housing Market Assessment or by other evidence. An appropriate mix of house types and sizes should be provided which enhance local housing options and is acceptable for the site and location. Allocations have been made for a range of house types, including housing for older people and executive housing. Policy HOU1 requires affordable housing to be incorporated into housing development or for an off-site contribution to be made in exceptional circumstances. Policy HOU6 establishes how the Council expects Self and Custom Build plots to come forward in the plan period, to meet the demand on its Self and Custom Build Register.
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	While a number of sustainable rural sites have been allocated proportionately in this plan, Policies HOU2 and 3a establish flexibility to enable local needs / specialist housing, and windfall plots, to come forward as the need arises during the plan period, without compromising the character or other qualities of the area. Policy HOU5 considers the criteria for any planning permission for isolated residential windfall in the countryside.
7. Requiring good design (paras 56-68)	
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	Policy SP6 requires that development proposals must be of high quality design and demonstrate a careful consideration of and a positive response to each of a number of design criteria. The design requirement of each allocation site is outlined in its policy, while design is a key consideration in the suitability of windfall development in the borough through Policy HOU3a. The parameters for internal and external space standards are outlined in Policies HOU12-HOU15, ensuring residents have enough space to undertake day-to-day living.

Soundness Test and Key Requirements	Evidence Provided	
	Further issues of design in relation to heritage assets and Conservation Areas are outlined in Policies HOU13 and 14.	
8. Promoting healthy communities (paras 69-77)		
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).	Policy SP6 requires that development proposals must be of high quality design and demonstrate a careful consideration of and a positive response to each of a number of design criteria. This includes the social aspects of design, and Building for Life standards which establish person-centred planning. Taken together, a core theme through the plan is that all development will be designed to a high standard to respect or enhance the character of the site and of the local area and to contribute to sense of place. Development proposals will be expected to optimise the potential of the site to accommodate development, create and sustain appropriate mix of uses including open space, local facilities and transport networks. Development should include a layout and design that takes into account potential users of the site and creates a safe and secure environment.	
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	Policy SP6 requires that development proposals must be of high quality design and demonstrate a careful consideration of and a positive response to each of a number of design criteria. This includes the social aspects of design, and Building for Life standards which establish person-centred planning. This is supported by Policies COM1-4 which seek to promote opportunities for and delivery of community spaces, leisure, recreation, sport and play, allotments and cemeteries. A number of other Policies – for example ENV2 (Ashford Green Corridor); ENV4 (Light Pollution) also seek to improve health and wellbeing indicators for local communities. Their supporting reports (Green Corridor Action Plan / Dark Skies SPD) are highlighted as complementary documents in delivering these policies. Opportunities are taken in many site policies to improve existing community provision of health and other infrastructure.	
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally	Policies COM1-4 are supported by the Open Space Strategy (2016), which identifies the specific needs for open space provision in the borough.	

Soundness Test and Key Requirements	Evidence Provided	
derived standards to provide these (73).	Strategic provision through this planning period is expected to be delivered in the areas of the sites allocated under Policies S3-5, adjacent to that delivered through the Chilmington Green AAP which this Plan complements. This will form part of an extended Green Corridor (Policy ENV2), which acts as a multifunctional network of Public Rights of Way. The PRoW network is safeguarded in individual site policies, with an expectation that these will be maintained and enhanced in conjunction with Policy TRA5 (provision for pedestrians).	
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	While Local Green Space is acknowledged as being worthy of protection and consideration in Policies ENV3a (Landscape Character and Design) and ENV13 (Protection of Heritage Assets), no sites are proposed as Local Green Space within the Local Plan.	
9. Protecting Green Belt land (paras 79-92)		
Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81) Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83) When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84) Boundaries should be set using 'physical features likely to be permanent' amongst other	Not applicable. There is no designated Green Belt within or adjacent to Ashford Borough.	

Soundness Test and Key Requirements	Evidence Provided
things (85)	
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)	
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)	A positive approach to adapting to and mitigating against the effects of climate change will be secured by promoting sustainable transport, sustainable energy technologies, and encouraging sustainable building design; avoiding development in areas at greatest risk of flooding; protecting and enhancing green networks; carefully considering the location, layouts and design of new housing; promoting sustainable drainage and challenging water efficiency standards. This is part of the core vision of the Plan (Policy SP1).

This is supported throughout the plan, most notably in Policies SP6 (Design); and through Policies ENV6-12 which focus on flood risk and water management; renewable and low carbon energy; air quality; and the requirements for non-residential design and construction.

Background documentation also considers climate change implications as a matter of urgency; especially the SFRA update (2017). |
| Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources.   (97) | The range and new commercial breakthroughs and market penetration of renewable and low carbon energies are highlighted in Policy ENV10, as suitable for both residential and commercial uses. These are supported in the Plan, and serve its overall vision, while maintaining flexibility for market delivery. |
| Minimise vulnerability to climate change and manage the risk of flooding (99) | The whole plan pays attention to the increased impact of climate change on a global, national and local scale. The Plan's Policies ENV6-10 focus specifically on different aspects of climate change.

The spatial strategy of the Plan, including allocations, has been based on an up-to-date SFRA, which is also reflected more specifically in Policy ENV6 on flood risk. Policy ENV9, along with the supporting Sustainable Drainage SPD, mitigates the impact of increasingly heavy rainfalls. This is explored further in the supporting Water Cycle Study (2016).

Policy ENV10 outlines the Council's support for a range of renewable energy sources to reduce reliance on fossil fuels; while ENV7 outlines its expectations for water efficiency in new build, since this has been |

Soundness Test and Key Requirements	Evidence Provided	
	delivered well in the borough.	
Take account of marine planning (105)	Ashford is a land-locked borough, and so marine issues are not specifically addressed in this Local Plan.	
Manage risk from coastal change (106)	Ashford is a land-locked borough, and so coastal issues are not specifically addressed in this Local Plan. However, attention to Ramsar sites is addressed in site policies where relevant, and in overall biodiversity terms in Policy ENV1.	
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	The momentum of the Plan is to promote the delivery and enjoyment of blue and green infrastructure. While presented in the strategic Policy SP1, it is in Chapter 5, Section D that these issues are more amply highlighted. Policy ENV1 seeks to preserve and enhance biodiversity in the borough, and on designated sites in particular. Policy ENV2 seeks to enhance and extend the Ashford Green Corridor, for biodiversity, amenity and wellbeing reasons – this is supported by the Green Corridor Action Plan. Policy ENV3a and b require new development to respect and enhance landscape character, with particular requirements in ENV3b to respect the borough's two AONBs and their settings. Other background documentation considers the Landscape impact of housing allocation in the borough; while there are requirements in site policies close to designated areas to consider landscape as a particular matter of importance.	
Prevent unacceptable risks from pollution and land instability (109)	Policy ENV4 in the plan reflects the guidance in the Council's adopted Dark Skies SPD, ensuring the impact of lighting on human health and wildlife are reduced, and that the borough's patches of intrinsically dark skies are retained. There are no highlighted areas of geological instability in the borough, but attention to geology is given as relevant in site policies as it contributes to landscape character, while it is raised as relevant in water and drainage policies (and the accompanying Water Cycle Study).	

Soundness Test and Key Requirements	Evidence Provided
Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)	The momentum of the Plan is to promote the delivery and enjoyment of blue and green infrastructure. While presented in the strategic Policy SP1, it is in Chapter 5, Section D that these issues are more amply highlighted. Policy ENV1 seeks to preserve and enhance biodiversity in the borough, and on designated sites in particular. Policy ENV2 seeks to enhance and extend the Ashford Green Corridor, for biodiversity, amenity and wellbeing reasons – this is supported by the Green Corridor Action Plan. Policy ENV3a and b require new development to respect and enhance landscape character, with particular requirements in ENV3b to respect the borough's two AONBs and their settings. Other background documentation considers the Landscape impact of housing allocation in the borough; while there are requirements in site policies close to designated areas to consider landscape as a particular matter of importance. Landscape impacts across boundaries are considered in the SA, while other background documentation (e.g. the Water Cycle Study) also considers cross-boundary biodiversity issues.
12. Conserving and enhancing the historic environment (paras 126-141)	
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	Policies ENV13-15 provide clear guidance for different aspects of the historic environment in the borough, including the appreciation of the significance of its heritage assets, its conservation areas, and the number of significant archaeological sites. This is complemented by the Ashford Heritage Strategy, which provides a detailed audit and positive strategy for the conservation and enhancement of the historic environment in its multiple strands, and local engagement with it.
13. Facilitating the sustainable use of minerals (paras 142-149)	
It is important that there is a sufficient supply of material to provide the infrastructure,	Minerals are covered in the adopted Minerals and Waste Local Plan 2013 – 2030, produced by Kent County Council. The presence of safeguarded minerals reserves is a consideration in site assessment and detailed

Soundness Test and Key Requirements	Evidence Provided
buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)	within the Sustainability Appraisal.
Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	

Justified: *The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.*

To be 'justified' a DPD needs to be:

• Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area.

• The most appropriate strategy when considered against reasonable alternatives.

Participation Has the consultation process allowed for effective engagement of all interested parties?	The Council's adopted Statement of Community Involvement sets out the standards and details of community consultation on the all Local Plans within the borough. It identifies who the Council consults and how they are consulted. The Consultation Statements describe how Ashford Borough Council has undertaken community participation and stakeholder involvement in the production of the Local Plan at its Regulation 18 and 19 stages.
Research / fact finding Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?	The Local Plan has been supported by a robust and proportionate evidence base. The list of reports and studies informing the development of the plan strategies and policies and the SA has been provided with the Examination Library. Audit trails for the development of the policies within the Local Plan are set out within the Statements of Consultation and SA Reports.

Soundness Test and Key Requirements	Evidence Provided
Alternatives Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?	Reasonable alternatives for the approaches selected in the Local Plan have been considered throughout the process. The consideration of these options has been detailed within the background evidence papers and the SA Reports provided at each stage of the document's development. Options for the Local Plan were outlined within the Sustainability Appraisal which was subject to public consultation, as outlined within the Consultation Statements.

Effective: *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.*

To be 'effective' a DPD needs to:

- Be deliverable
- Demonstrate sound infrastructure delivery planning
- Have no regulatory or national planning barriers to its delivery
- Have delivery partners who are signed up to it
- Be coherent with the strategies of neighbouring authorities
- Demonstrate how the Duty to Co-operate has been fulfilled
- Be flexible
- Be able to be monitored

Deliverable and Coherent • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious	The Plan's visions and objectives and how they will be achieved has been clearly set out in the introductory section. Policies contained within the Local Plan are considered to be internally consistent and the Sustainability Appraisal report has considered the cumulative impacts of the policies and how the policies

Soundness Test and Key Requirements	Evidence Provided
gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved?	relate to each other. It is not considered that there are any gaps to meet the vision and objectives. The Housing Trajectory and Monitoring Framework set realistic timescales related to policy outcomes.
Infrastructure Delivery • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?	The Local Plan is supported by the Infrastructure Delivery Plan. Where it has been identified that specific infrastructure is required to support a development this has been included in the allocation. Engagement with the infrastructure providers has been carried out through development of the plan and this is ongoing to ensure the timely delivery of necessary infrastructure. A Viability Assessment has been undertaken to ensure the delivery if the proposed strategy, including the provision of affordable housing.
Co-ordinated Planning Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	The strategic policies contained within the plan are spatial in nature. The policies within the plan have been developed in conjunction with relevant agencies and organisations, as detailed within the Consultation Statements and Duty to Cooperate Statement. In some cases, Statements of Common Ground have been prepared between the Council and partner bodies.
Flexibility • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?	Where possible and useful, the Local Plan has taken a flexible approach to new development and policies have been kept to a minimum and, where necessary, default to the NPPF and/or its successors. The policies and not so rigidly prepared that the plan would be out of date if the NPPF changed. The Council has paid heed to the Housing White Paper and other government announcements in establishing the direction of travel in

Soundness Test and Key Requirements	Evidence Provided
• Does the DPD include the remedial actions that will be taken if the policies need adjustment?	national planning policy. The Monitoring Framework identifies the remedial actions which may be taken if the policies need adjustment. The Council will continue to produce an Authority Monitoring Report to assess the effectiveness of the policies and identify when adjustment may be needed in the future. The Council states that it intends to review the Local Plan in any case by 2025.
Co-operation • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?	The Duty to Cooperate Statement details how the Council has met its obligations with regard to section 110 of the Localism Act 2011. How any cross-boundary and strategic issues have been identified and resolved is outline in the statement. In some cases, Statements of Common Ground have been prepared between the Council and partner bodies.
Monitoring • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?	The Monitoring Framework identifies indicators, targets and timescales which will be monitored through the Annual Authority Monitoring Report. The baseline for the appraisal of the Plan is set out within the SA Report.

Soundness Test and Key Requirements	Evidence Provided
Consistent with national policy: _the plan should enable the delivery of sustainable development in accordance with the policies in the Framework._	
The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.	
• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?	It is not considered that the Local Plan contains policies which are not consistent with national policy. The policies set out within the Local Plan are considered justified to aid the implementation of national policies at a local level.
• Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?	The plan has been developed to work in parallel with national policy and can readily respond to changes.

Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

Policy Expectations	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)	
Early and effective community engagement with both settled and traveller communities.	Gypsy, Traveller and Traveller Showpeople policies within the Local Plan are based upon a robust Gypsy and Traveller Accommodation Assessment. The methodology for this assessment included thorough engagement with the Gypsy, Traveller and travelling showpeople community in Ashford, as well as stakeholders which included Gypsy and Traveller representative bodies, to form a robust evidence base.
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	The Gypsy, Traveller and Travelling Showpeople community, as well as their representative bodies have been consulted throughout the development of the local plan. In formulating its understanding and appreciation of traveller needs, Ashford Borough Council has worked together with adjoining councils in the East Kent area. The Gypsy and Traveller Accommodation Assessment is, at the time of writing this report, undergoing an update. This will feed into an Issues and Options consultation which will be consulted on in January 2018.
Policy B: Planning for traveller sites (paras 7-11)	
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs. Set criteria to guide land supply allocations	The Local Plan adopts a dual approach to Gypsy and Traveller Accommodation delivery. This has arisen as a consequence of insufficient sites coming forward during the call for sites. Policies S43 and S44 allocate specific sites for traveller pitches, and Policy HOU16 sets out a 'windfall' policy to allow gypsy and traveller sites to come forward. This approach has delivered 31 pitches since the publication of the last GTAA. Gypsy and Traveller site allocations have been assessed through sustainability appraisals. Policy HOU16 seeks to ensure that new sites provide a good living environment and are well located in respect to employment

Policy Expectations	Evidence Provided
where there is identified need. Ensure that traveller sites are sustainable economically, socially and environmentally.	and services.
Policy C: Sites in rural areas and the countryside (para 12)	
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.	The site allocations within the Local Plan are located so as to ensure that there is dispersal of sites in rural areas.
Policy D: Rural exception sites (para 13)	
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	This is addressed through Policy HOU16 which allows windfall sites for Gypsies and Travellers to come forward to provide suitable supply.
Policy E: Traveller sites in Green Belt (paras 14-15)	
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green	There is no Green Belt designation within or adjoining Ashford Borough.

Policy Expectations	Evidence Provided
Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.	
Policy F: Mixed planning use traveller sites (paras 16-18)	
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	Policy HOU16 and its background text highlights the importance that Gypsy and Traveller sites do not adversely impact on nearby land uses.
Policy G: Major development projects (para 19)	
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	No major development proposals identified within this plan would see the displacement of Gypsies and Travellers from their sites. In addition, Policy HOU17 seeks to safeguard Gypsy and Traveller sites within the borough.

Integration of marine and terrestrial planning

As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with that of some terrestrial plan. Local authorities with any tidal frontage, even if far inland and not conventionally regarded as coastal, must therefore take full account of the MMO, the MPS and marine plans under S.58 of the Marine and Coastal Access Act and the Duty to Co-operate in Section 110 of the Localism Act 2011. A full list of the local planning authorities whose areas overlap with the UK marine area appears in Appendix One.

Furthermore, the Duty to Co-Operate requires all local planning authorities, even if landlocked, to take account, where relevant, of the MMO's plans and activities when preparing their Local Plans. Finally, the NPPF requires LPAs to take the MPS into account under the tests of soundness (specifically, to test if an emerging DPD is consistent with national policy, which includes the MPS).

The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area, establishing the Secretary of State as the Marine Planning Authority for these areas. The Act also provided for the establishment of the Marine Management Organisation (MMO) and for the Secretary of State to delegate various planning functions. The planning functions including preparation and review were delegated to the MMO in 2010. The Act also provided for the adoption of the UK Marine Policy Statement (MPS). The MPS was adopted on 18 March 2011 and provides the policy framework for marine planning and for all decisions likely to affect the marine area.

There are eleven plan areas in English waters, for each of which a Marine Plan will be prepared by the MMO and adopted by the Secretary of State for the Environment, Food and Rural Affairs.

In practical terms, all activities undertaken in the marine area require land based infrastructure, without which our ability to benefit economically and socially from activities in the marine area would be extremely limited.

The UK Government's vision for the marine environment, as articulated in the MPS, is:

'clean, healthy, safe, productive and biologically diverse oceans and seas'.

In the absence of a marine plan prepared by the MMO and adopted by the Secretary of State the MPS is the relevant marine policy document. Where a marine plan has been adopted both the MPS and the Marine Plan are relevant marine policy documents for the marine plan area.

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all[1] public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions[2]

In addition, the MPS seeks integration of marine planning and the terrestrial planning system through:

- Consistency between marine and terrestrial policy documents and guidance
- Liaison between respective responsible authorities for terrestrial and marine planning, including in plan development, implementation and review stages

- Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions

These aims are further supported by footnote 36 in the NPPF.

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[1] Like the Duty to Co-Operate, no distinction is made by the Marine and Coastal Access Act between public authorities with a tidal frontage and those without. Emphasis is placed on the likelihood of the decision being made affecting the marine area.
[2] For example, decisions about what representations they should make as a consultee or about what action they should carry out themselves.

Policy Expectations	Evidence Provided	
Key requirements under the Duty to Co-Operate		
Consistency between marine and terrestrial policy documents and guidance	While Ashford has no marine boundaries, a holistic approach to water management is presented in the Water Cycle Study (2016), reflected through in the Plan's Policies ENV6-9.	
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	While Ashford has no marine boundaries, a holistic approach to water management is presented in the Water Cycle Study (2016), reflected through in the Plan's Policies ENV6-9. The borough's Ramsar site has been considered in the HRA, and is highlighted and mitigated in relation to those site allocations in the vicinity of these areas.	
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	The sharing of evidence and relevant data with other responsible authorities has been detailed in the Duty to Cooperate Statement.	
Marine Policy Statement- Chapter 2: General Principles for Decision-Making[3]		
Sections 2.1 -2.2: The UK vision for the marine environment		
The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse	The Local Plan contributes to achieving this vision through Policies ENV6-9, and supported more extensively through the supporting Water Cycle Study (2016), which provides a comprehensive evidence-based approach to water management. The Plan seeks to ensure that the discharge of drainage systems does not	

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[3] As the Marine Policy Statement was not targeted specifically at terrestrial planning authorities, some of its sections are, in practice, relevant to marine planning authorities only and/or there is already a comprehensive policy framework governing terrestrial development (e.g. energy infrastructure), Where this is considered to be the case, i.e. where it is considered likely that a terrestrial planning DPD would be found sound without referencing that section, the section in question has been omitted from this checklist.

Policy Expectations	Evidence Provided	
oceans and seas') Achieving the vision through marine planning	adversely impact on the water quality of receiving water bodies and that new development improves water quality wherever possible. Policy ENV1 seeks to protect internationally important sites for biodiversity and geodiversity. These include the Dungeness, Romney Marsh and Rye Bay Ramsar Site and Special Protection Area.	
Section 2.4: Considering benefits and adverse effects in marine planning		
Consider benefits and adverse effects of plan policies	The potential benefits and adverse effects of the policy options has been assessed and detailed in the SA Report.	
Section 2.5: Economic, social and environmental considerations		
Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	The potential benefits and adverse effects of the policy options on EU directives/ Natural 2000 sites has been assessed and detailed in the SA Report. Policy ENV1 seeks to protect internationally important sites for biodiversity and geodiversity. These include the Dungeness, Romney Marsh and Rye Bay Ramsar Site and Special Protection Area. Policy ENV8 is in accordance with the overall objective of the Water Framework Directive, to achieve good ecological status and prevent deterioration in the status of all water bodies.	
Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities		
3.1 Marine Protected Areas		
Incorporate identified areas and features of importance for nature	The potential benefits and adverse effects of the policy options on EU directives/ Natural 2000 sites has been assessed and detailed in the SA Report. Policy ENV1 seeks to protect internationally important sites for biodiversity and geodiversity. These include the Dungeness, Romney Marsh and Rye Bay Ramsar Site and	

Policy Expectations	Evidence Provided	
conservation Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts	Special Protection Area.	
3.4 Ports and shipping		
Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety Protect the efficiency and resilience of continuing port operations	There are no coastal ports within the borough area, or active river ports, but the Duty to Cooperate statement outlines engagement with neighbouring authorities. The borough's strategic relationship with the Port of Dover is acknowledged within the Plan, but mainly in transport and strategic terms.	
3.8 Fisheries		
Consider potential economic, social and environmental impacts of other developments on fishing activity	Ashford has no marine boundaries, but Policy ENV8 is in accordance with the overall objective of the Water Framework Directive, to achieve good ecological status and prevent deterioration in the status of all water bodies. This is amplified in the accompanying Water Cycle Study (2016).	
3.9 Aquaculture		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	Ashford has no marine boundaries, so opportunities for seawater aquaculture are absent.	
3.10 Surface water management and waste		

Policy Expectations	Evidence Provided	
water treatment and disposal		
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	While Ashford has no marine boundaries, a holistic approach to water management is presented in the Water Cycle Study (2016), which considers surface, ground, waste, flood and drinking water issues and their interrelations. This is reflected through in the Plan's Policies ENV6-9.	
3.11 Tourism and recreation		
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities	Ashford has no marine boundaries.	

Appendix One

This is an alphabetical list of all local planning authorities in England whose area overlaps with the UK marine area.

Adur	Bassetlaw	Canterbury	Christchurch
Allerdale	Bexley	Carlisle	City of London
Arun	Blackpool	Castle Point	City of Brighton and Hove
Babergh	Boston	Chelmsford	City of Bristol
Barking and Dagenham	Bournemouth	Cheshire West and Chester	City of Kingston upon Hull
Barrow-in-Furness	Broadland	Chichester	City of Peterborough
Basildon	Broads Authority	Chorley	City of Plymouth

City of Portsmouth
City of Southampton
City of Westminster
Colchester
Copeland
Cornwall
County Durham
Dartford
Doncaster
Dover
East Cambridgeshire
East Devon
East Lindsey
East Riding of Yorkshire
Eastbourne
Eastleigh
Exeter
Exmoor National Park
Fareham
Fenland
Fylde
Gateshead
Gloucester
Gosport
Gravesham
Great Yarmouth
Greenwich
Halton
Hambleton
Hammersmith and Fulham
Hartlepool
Hastings
Havant
Havering
Horsham

Hounslow
Huntingdonshire
Ipswich
Isle of Wight
Isles of Scilly
Kensington and Chelsea
King's Lynn and West Norfolk
Lake District National Park
Lambeth
Lancaster
Lewes
Lewisham
Liverpool
Maidstone
Maldon
Medway
Middlesbrough
New Forest
New Forest National Park
Newark and Sherwood
Newcastle upon Tyne
Newham
North Devon
North East Lincolnshire
North Lincolnshire
North Norfolk
North Somerset
North Tyneside
North York Moors National
Park
Northumberland
Norwich
Poole
Preston
Purbeck

Redcar and Cleveland
Richmond upon Thames
Rochford
Rother
Scarborough
Sedgemoor
Sefton
Selby
Shepway
South Cambridgeshire
South Downs National Park
South Gloucestershire
South Hams
South Holland
South Lakeland
South Norfolk
South Ribble
South Somerset
South Tyneside
Southend-on-Sea
Southwark
Stockton-on-Tees
Stroud
Suffolk Coastal
Sunderland
Swale
Taunton Deane
Teignbridge
Tendring
Test Valley
Thanet
Thurrock
Tonbridge and Malling
Torbay
Torridge

Tower Hamlets
Wandsworth
Warrington
Waveney
Wealden
West Devon
West Dorset
West Lancashire
West Lindsey
West Somerset
Weymouth and Portland
Winchester
Wirral
Worthing
Wyre
York