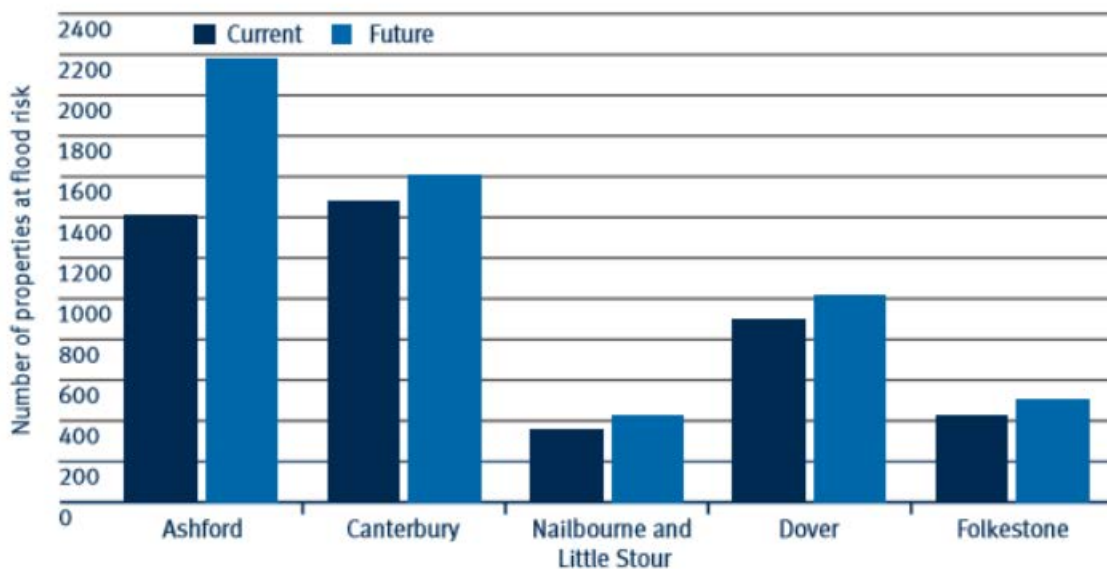


**Issue 2**

**Are the spatial vision and objectives for Ashford sound having regard to achieving sustainable development and the trends and challenges in the Borough?**

2.1 SP1- We support the vision given in SP1 regarding flood risk as Ashford is particularly sensitive to the impacts of climate change / development on flood risk.

**Figure 2. Current and future (2100) flood risk to property from a 1% annual probability river flood, taking into account current flood defences.**



Environment Agency River Stour Catchment Flood Management Plan 9

(full document available at – <https://www.gov.uk/government/publications/stour-catchment-flood-management-plan>)

2.2 We are concerned is that subsequent policies (such as Waterbrook) and current experience of past allocations (Conningbrook 1) would suggest that the vision doesn't translate into a robust defence by ABC of flood risk policies.

2.3 SP3 – We think that economic growth has been underestimated and therefore employment land is being proposed for release as residential in this plan which would otherwise be retained if the council had updated the economic scenario. This may result in a less sustainable distribution of development for future plans and overlooks the work done by the GADF exercise.

2.4 SP6 – The local plan allocations have overtaken the existing cycle strategy and some, particularly the larger allocations, could benefit from wording relating to master planning cycle routes between

sites. In particular the Kennington / North Willesborough sites and the Kingsnorth sites. Sites which could have delivered missing links such as the A5 leg in North Willesborough have been omitted from the plan allocations so it may be necessary to re-evaluate if that remains a policy aim and divert/extend a new route into developments beyond the existing strategy.

2.5 SP7 -The allocation of the A20 sites is not consistent with policy SP7 as it will create a coalescence of development along this corridor in a linear form which is unsustainable. In the same vein the allocation of site S58 represents a similar risk to coalescence of settlements. Nor do they appear to meet many of the criteria given by HOU5 (we appreciate they are not windfalls but would expect to see a similar criteria being applied to both windfalls and allocations).