

Ashford Borough Council

**SUSTAINABILITY APPRAISAL
(SA/SEA)
ENVIRONMENTAL REPORT**

May 2016



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1. NON TECHNICAL SUMMARY

1.1 The requirement for a Sustainability Appraisal

1.1.1 To make meaningful progress towards a more sustainable way of living, it is essential that Local Plans are developed in an integrated way where sustainability issues are considered from the outset. Sustainability Appraisal (SA) is a statutory requirement for Local Plans. The SA process provides a mechanism through which sustainability 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.

1.1.2 The Sustainability Appraisal process is tailored to incorporate the requirements of the Strategic Environmental Assessment (SEA). 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
- the identification of possible measures to prevent or mitigate these effects.

1.1.3 The NPPF requires that a SA, which meets the requirements of the European Directive on strategic environmental assessment, should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors (paragraph 165).

1.1.4 Regulation 12(2) of the 2004 Regulations¹ requires that the SA/ SEA report

*'identify, describe and evaluate the likely significant effects on the environment of (a) implementing the plan or programme;
(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme'.*

1.1.5 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. The Sustainability Appraisal should form an integrated part of the plan preparation process and

¹ The Environmental Assessment of Plans and Programmes Regulations (2004). These regulations implement European Directive 2001/42/EC, the SEA Directive.

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.

- 1.1.6 The Regulations require that an SA Report is published for consultation alongside the draft Plan (which, in this case, will be the Ashford Local Plan 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.
- 1.1.7 The process for the preparation of an SA is well-established and set out in national planning policy guidance and reproduced in Table 1 overleaf.

Content of this report

- 1.1.8 The Regulations 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?**
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? (Chapter 2)
 - **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. (Chapter 3 and 4)
 - **What are the appraisal findings at this current stage?**
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? (Chapter 4 and 5)
 - **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. (Chapter 6)

Sustainability appraisal process

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

1. Identify other relevant policies, plans and programmes, and sustainability objectives
2. Collect baseline information
3. Identify sustainability issues and problems
4. Develop the sustainability appraisal framework
5. Consult the consultation bodies on the scope of the sustainability appraisal report

Stage B: Developing and refining alternatives and assessing effects

1. Test the Local Plan objectives against the sustainability appraisal framework
2. Develop the Local Plan options including reasonable alternatives
3. Evaluate the likely effects of the Local Plan and alternatives
4. Consider ways of mitigating adverse effects and maximising beneficial effects
5. Propose measures to monitor the significant effects of implementing the Local Plan

Stage C: Prepare the sustainability appraisal report

Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public

Stage E: Post adoption reporting and monitoring

1. Prepare and publish post-adoption statement
2. Monitor significant effects of implementing the Local Plan
3. Respond to adverse effects

Local Plan preparation

Evidence gathering and engagement

Consult on Local Plan in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012).
 Consultation may be undertaken more than once if the Local Planning Authority considers necessary.

Stage C: Prepare the publication version of the Local Plan

Seek representations on the publication Local Plan (regulation 19) from consultation bodies and the public

Submit draft Local Plan and supporting documents for independent examination

Outcome of examination
 Consider implications for SA/SEA compliance

Local Plan Adopted

Monitoring
 Monitor and report on the implementation of the Local Plan

TABLE 1: KEY STAGES OF LOCAL PLAN PREPARATION AND RELATIONSHIP WITH SA PROCESS
 NPPG, Paragraph 013 Reference ID 11-013-20140306

1.2 The Draft Ashford Borough Local Plan

1.2.1 The Ashford Borough Local Plan 2030 sets out a sustainable and deliverable pattern of growth for the borough over the plan period to 2030. Key policies in the Local Plan address the quantum of new housing and jobs to be delivered and their locations. The Local Plan is set out as follows:

- Vision and Strategic Objectives
- Strategic Policies – Development requirements and locational strategy, delivering a sustainable town centre and promoting high quality design.
- Site allocations – Specific site allocations for a range of uses including housing and employment.
- Topic policies in the following chapters: Housing, Employment and the Local Economy, Transport, Natural and Built Environment, Community Facilities, and Implementation.

1.2.2 When adopted, the new Local Plan will supersede, with one exception, the current suite of Development Plan documents contained within the Local Development Framework (Core Strategy, Town Centre Area Action Plan 2010, Tenterden & Rural Sites Development Plan Document 2010 and the Urban Sites & Infrastructure Development Plan Document 2012) as well as any saved Borough Local Plan 2000 policies. The exception is the adopted Chilmington Green Area Action Plan (July 2013) that will be saved and continue to form part of the Development Plan for the Borough alongside the Local Plan to 2030.

1.3 The Appraisal Methodology

1.3.1 Stage A of the Sustainability Appraisal process commenced at the same time as preparation of the draft Local Plan. A Scoping Report setting out the issues that needed to be addressed was prepared and consulted upon to establish a framework for assessing reasonable alternatives, and site and topic policy areas against sustainability objectives. Each sustainability objective was accompanied by a number of sub-objectives and decision making criteria, which will assist in demonstrating whether the objective has been achieved.

1.3.2 This work was carried out during 2013-4 and was subject to consultation with the three statutory environmental bodies (Natural England, Historic England and the Environment Agency) in July 2013 and July 2014. The scoping report was amended to take into account the comments received at each stage. More details are provided in Chapter 2 of this report.

- 1.3.3 At this time the Council also commenced on producing a number of evidence base documents which inform the Local Plan 2030. These have also been the starting point for identifying reasonable alternatives that have been assessed through the Sustainability Appraisal process.
- 1.3.4 The main pieces of work which have informed the assessment of options are:
- Strategic Housing Market Assessment (SHMA) and updates - identifies reasonable alternatives for the amount of housing development proposed in the Plan
 - Strategic Employment Options Report (SEOR) and updates – identifies reasonable alternatives in relation to the employment growth in the Borough.
 - Strategic Housing and Employment Land Availability Assessment (SHELAA) and Employment Land Review – informs reasonable alternatives with regard to potential development sites and strategic distribution of development in the Borough.
- 1.3.5 Stage B of the Sustainability Appraisal; the identification and assessment of reasonable alternatives, has been an iterative process, as new reasonable alternatives have emerged from the relevant evidence as it has been produced. This report pulls together the assessments that have taken place over the time of the production of the Plan.
- 1.3.6 Chapter 3 sets out the reasonable alternatives in relation to the levels of development proposed in the Plan and the strategic distribution of that development around the Borough.
- 1.3.7 Chapter 4 sets out the assessment of reasonable alternatives in relation to proposed site allocations, and includes an assessment of the effect of the site allocations which are proposed in the draft Local Plan 2030.
- 1.3.8 Chapter 5 sets out the likely effect of the proposed strategic and topic policies. This includes an assessment of the effects of the strategy that is taken forward in the draft Local Plan 2030.
- 1.3.9 Chapter 6 considers ways of mitigating and enhancing the proposals in the Plan, and ways it can be monitored.
- 1.3.10 The Sustainability Appraisal for traveller sites has been carried out as a separate process, as this requires different considerations. This has therefore been produced as a separate document.

3.7.10 Clearly both alternatives ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs. The range of provision between scenarios is 13,799 - 16,855 dwellings and so both alternatives would have a significant positive effect on this objective. Whilst Alternative 3.2 would be likely to facilitate greater economic growth and high quality employment opportunities than Alternative 3.1, sites are likely to be located in less accessible locations within the Borough and so perform less well on the test of facilitating accessible employment space. In this way, each alternative is equally scored as contributing to the achievement of the objective. The significant additional land take for Alternative 3.2 is likely to result in greater negative impact on the landscape, cultural heritage and biodiversity of the Borough. The additional amount of land required to meet the needs of the Alternative 3.2 would also be likely to have a significant negative impact on protecting and making the most efficient and appropriate use of land, soils and geological assets and ensuring the prudent use of resources and the sustainable management of waste. It can be seen that Alternative 3.1 is likely to have the least negative impact on the environment of the Borough and be the most likely to encourage modal shift. This scenario would also be more likely to improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy as they would rely less on out of centre office employment opportunities.

3.7.11 In conclusion, both alternatives can be shown to have a significant positive effect on the delivery of housing and facilitating sustainable economic growth. Whilst Alternative 3.1 would create fewer jobs than Alternative 3.2, the job opportunities would be likely to be more sustainably located, allow greater modal shift and be more likely to enhance the town and district centres – whilst their environmental impacts are likely to be substantially lower. For the reasons set out above the preferred combined alternative employment and housing growth for the Local Plan is Alternative 3.1 (Baseline Employment Scenario with Housing Provision to Meet Objectively Assessed Need with an uplift to achieve the Baseline Employment Scenario; and London migration).

3.8 The strategic distribution of housing and employment development within the Borough

What are the reasonable alternatives?

3.8.1 It is assumed that the preferred combined employment and housing growth outlined in the SA/SEA will provide the basis for the Ashford Borough Local Plan: 12,400 new jobs and 14,680 dwellings. However, there are a number of strategic options for the distribution of housing and business development within the Borough.

3.8.2 SA/SEA objective 12 seeks to facilitate sustainable economic growth and high quality employment opportunities in accessible locations within the Borough whilst objective 8 seeks to encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes. In order to help meet these objectives there will need to be a reasonable relationship between the location of housing and employment. For the purposes of assessing the strategic options for the distribution of housing and business development it has been assumed that employment development would be located proportionately at broadly the same locations as the housing development.

3.8.3 In assessing the reasonable alternatives for the distribution of housing and employment development, the scale; existing physical, social and green infrastructure and development constraints of existing settlements is relevant. The hierarchy of settlements in Ashford Borough is as follows:

Ashford Town

3.8.4 The Borough is dominated by the town of Ashford which contains the highest population, most job opportunities and higher order services such as domestic and international high-speed rail services; hospital; shopping centres and leisure and entertainment venues.

Rural Service Centres

3.8.5 Tenterden is the primary rural service centre and serves much of the south-western part of the borough. Of all the rural service centres it has the largest population base, workforce and concentration of businesses and is relatively well served by shops and services within the historic town centre which is designated as a Conservation Area. The High Weald AONB encircles the town on three sides.

3.8.6 Charing, Hamstreet and Wye: This group of rural service centres are located on rail-lines as well as providing a good range of local services to serve the surrounding rural area such as shops, public houses, school, doctor, public open space, place of worship and serve surrounding villages with a basic range of services. All provide some local employment opportunities. Part of each of the settlements is designated as a Conservation Area. Wye is set within the AONB as is the area to the north of Charing.

Other settlements

3.8.7 Aldington, Appledore, Bethersden, Biddenden, Brabourne Lees/Smeeth, Challock, Chilham, Egerton, Great Chart, High Halden, Hothfield, Mersham, Pluckley, Rolvenden, Shadoxhurst, Smarden, Wittersham and Woodchurch

3.8.8 Excluding the settlement of Kingsnorth close to the urban area of Ashford, there are a number of settlements which are the primary settlements in their parish. They provide a range of local services such as shop, public house, school, doctor, public open space, place of worship, community space and serve surrounding villages with a basic range of services. The larger the settlement, the greater the number of services provided. The parishes provide some local employment opportunities. Part of each of the settlements is designated as a Conservation Area with the exception of Challock and Brabourne Lees. Chilham, Rolvenden, Challock, Westwell and Wittersham are all set within or within the setting of the AONB.

3.8.9 The SHELAA identifies sites which are available for development. Considering this, there are a range of alternatives that appear to be feasible in terms of distributing the new development associated with the preferred levels of growth:

3.8.10 Alternative 4.1 – Focus all development in and on the periphery of Ashford urban area, with no development in Tenterden or the villages

3.8.11 Alternative 4.2 – Focus a large majority of development in and on the periphery of Ashford urban area supported by proportionate growth in Tenterden; the rural service centres and other villages

3.8.12 Alternative 4.3 – Focus significant development outside of Ashford urban area, in particular at Tenterden; Charing; Hamstreet; Wye and the majority of the remaining parishes

3.8.13 Alternative 4.4 – Focus significant development outside of Ashford urban area with the creation of a new settlement

Appraisal of Development Options against Local Plan Objectives

3.8.14 It is necessary for the SA/ SEA to examine the impacts of each alternative to assist the Borough Council in selecting the appropriate provision of additional housing. The alternatives are first tested against the Local Plan objectives and then the SA/ SEA objectives.

3.8.15 In accordance with Local Plan objective (f) all the alternatives would meet the changing housing needs of the Borough's population, including affordable and starter homes, self build and custom build properties, specialist housing for older residents, accommodation to meet the needs of the Gypsy and Traveller community and large quality family housing. Similarly, all the alternatives would meet objective (g) to provide a range of employment opportunities to support the growing population and attract inward investment.

3.8.16 Alternative 4.1 is likely to best meet Objectives (a) To focus development at accessible and sustainable locations which utilise existing infrastructure, facilities and services wherever possible and makes best use of suitable brownfield opportunities; (c) To create the highest quality design which is sustainable, accessible... and (d) To ensure development is supported by the necessary social, community, physical and e-technology infrastructure, facilities and services...as Ashford has the widest range of infrastructure, facilities and services and the greatest opportunity to use brownfield sites. Alternative 4.2 is likely to be the next best alternative in relation to these Local Plan objectives as the scale of development is based proportionately on the range of services available and size of settlement. Alternatives 4.3 and 4.4 are likely to perform the poorest in meeting these Local Plan objectives.

3.8.17 Alternatives 4.1 and 4.2 are likely to best meet Objective (e) To promote access to a wide choice of easy to use forms of sustainable transport modes, including bus, train, cycling and walking to encourage as much non-car based travel as possible and to promote healthier lifestyles as Ashford has the widest range of transport options and most frequent sustainable transport services and as the scale of development in Alternative 4.2 is based proportionately on the size of settlement with the three rural service centres Charing, Hamstreet and Wye located on rail-lines. Alternatives 4.3 and 4.4 are likely to perform the poorest in meeting these Local Plan objectives.

Appraisal of Development Options against SA Objectives

3.8.18 Table 11 sets out the assessment of the development distribution scenarios against the SA Objectives (refer to key set out in Table 8)

Table 11 – Assessment of Development Distribution Scenarios against the SA Objectives

Strategic Distribution of housing and employment options	Alternative 4.1 Focus all development in and on the periphery of Ashford urban area, with no development in Tenterden or the villages	Alternative 4.2 Focus a large majority of development in and on the periphery of Ashford urban area supported by proportionate growth in Tenterden; the rural service centres and other villages	Alternative 4.3 Focus significant development outside of Ashford urban area, in particular at Tenterden; Charing; Hamstreet; Wye and the majority of the remaining parishes	Alternative 4.4 Focus significant development outside of Ashford urban area with the creation of a new settlement
SA Objective				
1 To protect and enhance the Borough's areas of biodiversity importance.	?	?	?	?
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	-	-	--	--
3 To conserve and enhance sites of cultural heritage and archaeological importance.	?	?	?	?
4 To help mitigate, and reduce the impact of, climate change and flooding.	?	?	?	?
5 To ensure the delivery of a mix of good quality, sustainably	++	++	++	+

constructed homes to meet identified needs.				
6 To ensure that all groups of the Borough's population have access to services and facilities so that opportunities for social inclusion are maximised.	++	++	--	--
7 To improve the health and quality of life for those living and working in the Borough.	+	++	-	+
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	++	+	--	+
9 To ensure that development responds appropriately to current and future infrastructure requirements	+	+	--	--
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	+	++	-	--
11 To ensure the prudent use of resources and the sustainable management of waste.	?	?	?	?
12 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.				
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	+	++	+	--

3.8.19 All alternatives are likely to help ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs although Alternative 4.4 would be dependent on significant advanced infrastructure investment and would be concentrated on a single area which lacks the benefit of a range of locations, owners and developers to assist delivery which may delay housing provision and therefore may be less likely to ensure the delivery of planned housing.

3.8.20 In terms of employment opportunities, Alternative 4.1 would have a significant positive impact on facilitating sustainable economic growth and high quality employment opportunities in the most accessible location within the Borough. Similarly, Alternative 4.2 would be likely to have a significant positive impact on improving the accessibility of jobs as the scale of development is based proportionately on the size of settlement and this option would help promote the rural economy. Alternative 4.3 would result in significant employment development outside of Ashford in the least accessible locations. The ability of a new settlement to attract a range of employment opportunities including significant development within Use Classes B1 – B8 is unknown but by definition a new settlement would need to compete with existing markets such as the accessible location of Ashford town centre.

3.8.21 In relation to access to education, health and community services, Alternatives 4.1 and 4.2 would have a significant positive impact by locating a significant proportion of development within Ashford and by scaling development proportionately to the size of settlement respectively. Alternative 4.2 would also be likely to help protect and enhance the retail offer of Ashford and the rural service centres. Focusing

significant development at Tenterden, Charing, Hamstreet, Wye and the majority of the remaining parishes would be likely to have a significant negative effect on ensuring access to services and facilities given that the range of services in the rural service centres and smaller scale villages is significantly less than at Ashford and Tenterden. Locating significant development outside of Ashford with the creation of a new settlement would rely to a greater extent on the provision of new services rather than the use of existing services. There would be no opportunity to help reduce deprivation in the most deprived wards and the range, scale and timing of such services is likely to mean that this alternative would have a significant negative effect on this objective.

3.8.22 In the same way, in relation to responding appropriately to current and future infrastructure requirements, whilst Alternatives 4.1 and 4.2 would be likely to a greater degree to utilise and enhance existing social, green, transport and utilities infrastructure, Alternative 4.3 would be likely to overload the existing infrastructure of smaller scale settlements. Whilst enhancements to existing infrastructure may be provided, the dispersed smaller scale nature of development would mean that the trigger points for certain types of infrastructure may not be met and consequently the range, scale and timing of such services is likely to mean that this alternative would have a significant negative effect on this objective. The dispersal of, in particular, significant employment development to the rural areas would be likely to have a significant negative impact on rural roads/ lanes. Alternative 4.4 of focusing significant development outside of Ashford with the creation of a new settlement would rely to a large extent on the provision of new infrastructure. The range, scale and timing of such services, whilst retaining a viable development, and their connections to existing routes, is likely to mean that this alternative would have a minor positive effect on this objective.

3.8.23 In terms of improving the health and quality of life for those living and working in the Borough, Alternatives 4.1 and 4.2 would be likely to have a significant positive effect as facilities would be likely to be within close range increasing opportunities for access on foot or cycle. Populations would be well served by a range of existing and new green open spaces. This significant positive effect would be tempered in Alternative 4.1 to minor positive effects as the impacts of transport on air pollution in the town mean that a limited number of locations suffer from concentrations of NO₂. Accessibility on foot or cycle to a range of services and public open space and convenient access to GPs and hospitals is limited for the dispersed development, Alternative 4.3, though there would be the opportunity of good access the public footpath network within the countryside. The location of significant development outside of Ashford with the creation of a new settlement would allow the opportunity to create easy access on foot and cycle to services and the provision of new, well located public open space. Nevertheless, the range, scale and timing of such services, whilst retaining a viable development, is likely to mean that this alternative would have a minor positive effect on this objective.

3.8.24 By focusing all development at Ashford with the greatest range of services and the widest choice of sustainable modes of transport, Alternative 4.1 would be likely to have a significant positive effect on encourage modal shift and enhancing connectivity between communities and town/ district centres through safe pedestrian and cycle routes. As the scale of development in Alternative 4.2 is based proportionately on the size of settlement there will be opportunities for pedestrian and cycle links to local services and to reduce the need to travel. Within this alternative, the dispersal of employment opportunities in the rural area may not encourage modal shift and therefore this option is likely to have only a minor positive effect. In addition, the three rural service centres Charing, Hamstreet and Wye are located on rail-lines and this alternative is likely to have a minor positive impact on this objective. The dispersed pattern of development represented by Alternative 4.3 is not likely to locate housing or employment development near to sustainable transport options and this alternative is likely to have a significant negative effect on this objective. Alternative 4.4 could be developed around a network of footpaths and cycleways to local services but the need for a critical mass to generate viable public transport provision and the distance from most higher order services is likely to result in a minor positive effect on this objective.

3.8.25 The objective of improving and sustaining the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy is most likely to be best met by Alternative 4.2. This focuses almost all development in and on the periphery of Ashford – so supporting the town and district centres within the town - with some proportionate growth in Tenterden, small scale development at Charing, Hamstreet and Wye and limited development in the majority of the remaining parishes. This would, in turn help maintain the retail hierarchy provided in Tenterden town centre, the centres of Charing, Hamstreet and Wye and the smaller villages where limited development is located. Alternative 4.1 locates all development in and on the periphery of Ashford and, whilst benefiting the town and district centres, would not spread the benefits of growth to smaller scale settlements and would therefore only have minor beneficial effect on this objective. The dispersal of development away from Ashford provided by Alternative 4.3, including into much smaller settlements, would provide less support for the town and district centres and may result in retail expenditure leaking away from the Borough's retail hierarchy and therefore would only have minor beneficial effect on this objective. The free-standing new settlement would not be likely to help sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy and would therefore be likely to have a significant negative effect.

3.8.26 In relation to protecting and making the most efficient and appropriate use of land, soils and geological assets, by locating all development at Ashford, Alternative 4.1 would not be able to take up the opportunities for brownfield development within the

rural service centres, other villages or the rural area and so would be likely to have a minor positive impact on this objective. Alternative 4.2, by locating development proportionately to the size of settlement, is most likely to be able to optimise the use of brownfield sites in Ashford, the rural service centres, other villages or the rural area (including employment opportunities within rural buildings) and therefore this alternative would be likely to have a significant positive impact on this objective. Significant levels of dispersed housing and employment development presented by Alternative 4.3 may be able to take up the opportunity for some brownfield development but would have to rely heavily on greenfield sites and so have a minor negative impact. A new settlement would rely almost entirely on significant greenfield land take and would therefore have a significant negative impact on this objective.

3.8.27 With its reliance on greenfield sites, the more dispersed distribution pattern of Alternative 4.3 and the large scale free-standing urban area of Alternative 4.4 would be likely to have the greatest impact on the character and quality of the landscape with potential significant negative effects on the designated landscape of the Area of Outstanding Beauty as Chilham, Rolvenden, Challock, Westwell, Wittersham and Wye are set within an AONB as is the area to the north of Charing. It may also be difficult to integrate significant development within the townscape of smaller settlements. Focusing all, or a significant amount of, housing and employment development in and on the periphery of Ashford (Alternatives 4.1 and 4.2) would be likely to require large scale urban extensions which may have some potential negative effects on landscape, with the AONB lying to the north of the town. In addition, the proportionate distribution of development based on the scale of the settlement should allow reasonable integration of development into the townscape. Overall, Alternatives 4.1 and 4.2 are likely to have a minor negative effect on this objective.

3.8.28 It is difficult to predict the precise impact of development options on the Borough's areas of biodiversity importance; sites of cultural heritage and archaeological importance and natural resources (particularly minerals and agricultural land quality) as this relates more to the specific locations which are selected. Most of the Borough's agricultural land is classified as Grade 3 and therefore there is unlikely to be any appreciable difference in impact in this regard. Potential mineral resources are primarily associated with sub-alluvial river terraces and comprise gravel and silica sand. Should such minerals be viable resources, it is unlikely that development would be located within the river floodplain and therefore there is unlikely to be any appreciable difference in impact in this regard.

3.8.29 In conclusion, Alternatives 4.1 and 4.2 have most beneficial effects on SA objectives. The two alternatives impact in similar ways in that both focus development in or on the periphery of Ashford. Alternative 4.1 has four major significant positive effects and four minor positive effects whereas Alternative 4.2

has six major significant positive effects and two minor positive effects. Of the two options, Alternative 4.1 scores most strongly on encouraging modal shift but performs less strongly than Alternative 4.2 in supporting the wider services within rural settlements and optimising the use of brownfield sites. Alternatives 4.3 and 4.4 perform worst against SA objectives with both generally having minor or significant negative effects. Alternative 4.4 has the opportunity to have some positive impact on modal shift and related health benefits but overall still results in only three minor positive benefits. For these reasons, Alternative 4.2 of focusing almost all development in and on the periphery of Ashford supported by some proportionate growth in Tenterden, small scale development at Charing, Hamstreet and Wye and limited development in the majority of the remaining parishes is considered to be the most sustainable alternative.

3.9 The strategic distribution of housing and employment development at Ashford Urban Area

What are the reasonable alternatives?

- 3.9.1 The preferred strategic distribution of housing and business development within the borough is to focus a large majority of development within and on the periphery of Ashford urban area supported by some proportionate growth in smaller settlements.
- 3.9.2 Almost all of the available major brownfield sites in the town are already identified for redevelopment in the existing development plans, have planning permission or are under construction. In addition, the mixed use urban extension at Chilmington Green is allocated in adopted plans and a planning application is currently being processed.
- 3.9.3 The principal opportunities for further significant new growth therefore lie on the edge of the built up area of Ashford (beyond existing commitments at Chilmington Green and Cheeseman's Green) through carefully managed and planned growth.
- 3.9.4 Given the sites that the SHELAA identifies as being available for development, there would appear to be two broad locations where significant new development could be clustered: to the north west of the town around Beechbrook and the Eureka business park or to the south of the town around Kingsnorth.
- 3.9.5 An alternative would be to disperse development in a number of locations within various sectors at the edge of the town (north; south; north east and south east). The north west sector has been reduced to the north sector only to provide a distinctive alternative which can be tested without impact on the AONB.