

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.

1.4 Next Steps and how to comment

- 1.4.1 In accordance with the Environmental Assessment of Plans and Programmes Regulations 2014 and the SA/SEA Guidance this Sustainability Appraisal forms part of the consultation of the Publication Draft of the draft Ashford Local Plan 2030, and therefore the Council is inviting comments on the detail and appraisal outcomes contained within this SA.
- 1.4.2 This Sustainability Appraisal report is subject to a period of public consultation between 15th June 2016 and 10th August 2016.
- 1.4.3 Comments and representations can be submitted using the comments form overleaf, which should be sent by email to planningpolicy@ashford.gov.uk or by post to Planning Policy, Ashford Borough Council, Civic Centre, Tannery Lane, Ashford, Kent, TN23 1PL.

**Ashford Borough Council
Sustainability Appraisal (SA/SEA) Environmental Report
(Ashford Local Plan 2030)**



ASHFORD
BOROUGH COUNCIL

For office use only Reference No:

Representation Form

Please return this form by 5pm on Wednesday 10th August 2016

Personal Details

Name of individual:
Organisation (<i>where relevant</i>):
Address:
..... Postcode:
Email address: Daytime Tel. No:

If an agent has been appointed to act on your behalf please give the agent's details	
Name:
Address:
..... Postcode:
Email address:	Daytime Tel. No:

Please provide your comments below, with reference to the relevant paragraph or site number.
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2.SCOPE AND CONTEXT

2.1 The Scoping Report and Consultation

2.1.1 The scope and context for the SA has been set out in the Ashford Borough SA Scoping Report. The final version is included at Appendix 1. The Scoping Report covers Stage A of the Sustainability Appraisal process. The following summarises what is included in the Scoping Report and explains how it was produced and consulted upon.

2.1.2 The Scoping Report identifies other relevant plans, programmes and environmental protection objectives and sets out the baseline characteristics of the Borough. The following scoping questions are answered:

- What's the Plan seeking to achieve?
- What's the sustainability baseline context?
- What's the sustainability baseline at the current time?
- What's the baseline projection?
- What are the key issues that should be a focus of SA?

2.1.3 This information has been grouped into the following sustainability topics, which were selected to reflect a broad understanding of the anticipated scope of plan effects.

- Biodiversity
- Landscape, Cultural Heritages and Archaeology
- Climate Change Mitigation and Adaptation
- Housing and Affordable Housing
- Access to services including social inclusion
- Health and Wellbeing
- Design Quality
- Water Quality and Quantity
- Land Use, Geology and Soil
- Minerals and Waste
- Economic Growth, Employment and Skills
- Town and District Centre Vitality
- Sustainable Travel

- 2.1.4 From this data, the SA objectives were derived, and a draft SA Framework produced. The SA framework was also used to develop a site assessment proforma to be used to assess sites which are proposed in the draft Local Plan, and the reasonable alternatives.
- 2.1.5 The Scoping Report also sets out how 'significant effects' would be considered.
- 2.1.6 Consultation on the draft Scoping Report and Sustainability Appraisal Framework was initially carried out in July 2013. The three statutory consultees Natural England, English Heritage and Environment Agency were sent a copy of the draft Scoping Report and invited to make comments on it. Follow up correspondence in August of that year provided a further opportunity for these consultees to make comments.
- 2.1.7 Response was received from Natural England (Appendix 1 – Annex 4), and the Scoping Report was amended to take into account their comments.
- 2.1.8 No substantive response was received from the Environment Agency or English Heritage.
- 2.1.9 Following a further year of work on the Local Plan, it was necessary to update the SA Framework and site assessment pro-forma table to reflect the most recent guidance and ensure that it provided maximum clarity and consistency. This was completed in July 2014, and consultation was carried out with the three statutory consultees. (Appendix 1 – Annex 4)
- 2.1.10 Response was received from Natural England (Appendix 1 – Annex 4) who made detailed comments and suggestions in relation to the site assessment proforma. Where considered reasonable and appropriate, their comments were taken into account and changes were made (see Appendix 1 – Annex 5 for more details).
- 2.1.11 Further minor changes had to be made to the site assessment proforma, as it became apparent that the information was not available at the individual site level in order to answer the question set out. Four questions were therefore removed at this stage. For further details please see Appendix 1 – Annex 6).
- 2.1.12 The 'significant effects' table was also updated to include a 'No Relationship' option, as it became apparent during the assessment of the strategic reasonable alternatives that some did not fall within any of the other options.

2.1.13 This has all been captured within the Final Scoping Report dated September 2014 (Appendix 1)

Other updates to baseline information since the Scoping Report

2.1.14 With regard to baseline environmental designations, Natural England notified the Council in March 2016 that the Secretary of State had considered the results of the 2010 consultation on proposals to designate the Dungeness, Romney Marsh and Rye Bay SPA and the Dungeness, Romney Marsh and Rye Bay Wetland of International Importance (Ramsar site), and that as of 30 March 2016 these sites are now so designated and have been placed on the register of Natura 2000 sites. The SA assessment have been carried out as if these were designated international sites in accordance with NPPF paragraph 118 and therefore this recent decision to confirm their status has not impacted upon its conclusions.

2.2 Key Sustainability Issues

2.2.1 The Scoping Report identifies the key sustainability issues for the Local Plan, following its review of relevant plans, policies, programmes and baseline data. These are set out in Table 2 below.

Table 2 - Key Sustainability Issues

ISSUE	SOURCE	LINK TO SA OBJECTIVE/S
1. Meeting the boroughs need for new housing development and affordable housing, particularly in rural areas	NPPF, ABC housing needs survey (section 2.5).	5
2. Responding to the demographic changes in the borough's population e.g. the ageing population (by planning for care homes, accessible homes and healthcare), the growing proportion of young people (education and skills training) and the increasing Nepalese population.	ABC & KCC data (sections 2.6 & 2.7)	6, 7
3. Provision of infrastructure and services which are phased in line with housing and employment growth and are accessible to the communities they serve.	NPPF, ABC & KCC data (sections 2.6 & 2.7)	6

4. Facilitating the delivery of new, higher skilled jobs within the borough and improving the overall skills base of Ashford's residents.	Data, ABC corporate priority (section 2.11)	12
5. Encouraging modal shift and more sustainable methods of travel.	Section 2.14	8
6. Utilising land efficiently and effectively and in a manner which respects the borough's historic, cultural heritage and landscape assets and high grade agricultural land.	Data and GIS (section 2.3)	10, 11, 2, 3, 4
7. Limiting the impact on protected species and enhancing biodiversity through the protection, provision and enhancement of key habitats and linkages to sustain the local habitat network, including through provision of open space, sustainable drainage and green corridors.	Data (section 2.2)	1, 2
8. Provision of strategic open space which meets a range of recreation, public health, ecological, flood risk mitigation and nature conservation objectives.	Environmental and public health data – see sections	4, 1, 7
9. Encouraging the integration of sustainable energy technologies and solutions as part of the design and delivery of new housing	NPPF policy, Council priority, section 2.4	5
10. Ensuring that flood risk is managed appropriately and that new development sites are sequentially tested so that they are allocated to land at least risk of flooding.	Flood risk mapping, EA data (section 2.4)	4
11. Ensuring that the quality of water bodies and groundwater in Ashford does not deteriorate, but improves.	EA data – section 2.9	4
12. Provision of a broadband network across the borough which boosts economic viability and increases the flexibility of homes and business premises.	NPPF policy priority, policy objective for ABC	12, 6
13. Supporting the economic growth and vitality of Ashford and Tenterden town centres.	NPPF, ABC priority	13

14. Helping to reduce deprivation by increasing access to services and employment opportunities.	Data (section 2.6, 2.12), ABC priority	6, 12
15. Encouraging healthier lifestyles through access to green open space, play and recreational opportunities, as well as through the provision of safe pedestrian and cycle routes.	Data (section 2.7)	7, 8
16. Encouraging and securing high quality design in new developments which is appropriate to its context.	NPPF, ABC policy (section 2.8)	2, 10, 5

2.3 The final SA Framework and Objectives

- 2.3.1 The main sustainability issues identified through the Scoping Report and set out above, were used to develop the final SA framework, objectives and assessment scoring system. These have also been informed by consultation with the statutory bodies where responses were received, as outlined in Section 2.1.
- 2.3.2 Table 3 overleaf sets out the overarching SA objectives.
- 2.3.3 To inform the assessments the general framework is also supported by SA prompt questions and monitoring criteria which have been used when carrying out the assessments on the draft Local Plan and reasonable alternatives (Appendix 1 – Annex 1)
- 2.3.4 Separate site assessment forms and guidance notes (Appendix 1 – Annex 2) were developed and have been used to assess potential development sites which have been identified through the SHELAA. This has informed the site selection process and is explained in more detail in Chapter 5 of this report.

Table 3 - Sustainability Appraisal Objectives

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

2.4 Relationship with Habitats Regulations Assessment

2.4.1 The NPPG² requires the Sustainability Appraisal to take account of the findings of a Habitats Regulations Assessment, if one is undertaken. The draft Local Plan is supported by a Stage 1 Screening Habitats Regulations Assessment.

2.4.2 The *Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010*, collectively referred to in this report as the Habitats Regulations, implement the Habitats Directive in England & Wales. Under the Habitats Regulations any land use plan likely to have a significant effect upon a 'European site' must be subject to an appropriate assessment to determine the implications for the designated site in view of its conservation objectives. 'European sites' are sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within a European context. They consist of Special Areas of Conservation (SAC) designated under *Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora* and Special Protection Areas (SPA) designated under *Council Directive 2009/147/EC on the Conservation of Wild Birds*. Ramsar Sites (designated under the 1976 Ramsar

² Para 011 Ref ID: 11-011-20140306

Convention) are not European sites but under UK planning policy are given the same level of protection.

- 2.4.3 Under the Habitats Regulations the Council, as the competent body, must determine if the Ashford Local Plan is likely to have a significant (adverse) effect on a European or Ramsar site, either alone or in combination with other plans or projects. If significant effects are anticipated then an appropriate assessment of the implications for the site in view of its conservation objectives must be undertaken.
- 2.4.4 There are currently two internationally designated sites within the Borough. In accordance with the Habitats Regulations, a Report to inform screening for Appropriate Assessment³ has been undertaken which looks at the potential effects of the policies contained in the Ashford Local Plan on the European sites within the borough and following the precautionary approach a number of other European sites located within a broad radius of the borough. In this regard, all of the allocations and policies in the Plan were assessed for potential conflicts with the European sites. The majority of these were scoped out as there is no opportunity for any of these policies to result in adverse effects on European sites. In the cases where there could be individually or in combination effect on a European site, a specific mitigation criteria was included in the policy.
- 2.4.5 The findings of this assessment have been used, as appropriate, to inform the findings of this SA.

³ Habitat Regulation Assessment (incorporating appropriate assessment scoping report), Ashford Borough Council, June 2016

3. APPRAISAL OF STRATEGIC DEVELOPMENT PROPOSALS AND REASONABLE ALTERNATIVES

3.1 Introduction

3.1.1 The following sections sets out Stage B of the Sustainability Appraisal process, in relation to the strategic proposals in the Plan. First it sets out the testing of the draft Local Plan Vision and Strategic Objectives against the SA framework. Secondly it considers the sustainability impact of the employment and housing proposals set out in the Plan, and their reasonable alternatives, including the amount of development and their distribution around the Borough.

3.2 Appraisal of Local Plan Vision

3.2.1 The draft Local Plan Vision is set out below. This iteration of the vision has been informed by an initial testing of the draft revision against the SA framework, which recommended minor amendments to improve the compatibility of the vision with the SA framework. The original vision and the proposed changes are set out in Appendix 2.

By 2030:

1 Ashford Borough will meet its housing and employment needs through the provision of new high quality development, and necessary supporting infrastructure and services, in sustainable and accessible locations that reflect the Borough's environmental constraints.

2 Ashford town will continue to be the main focus for high quality development with the revitalisation of the centre and areas where there are existing environmental and social issues and the creation of two attractive and cohesive new neighbourhoods to the south.

3 A regenerated Ashford Town Centre will be delivered that will significantly enhance its leisure, cultural and residential offer whilst providing retail space that allows it to support the expanded population and compete locally with other centres. The centre's heritage offer will be conserved and enhanced and provide the context around which to develop new opportunities within distinctive character areas enabling a newly focused Town Centre to thrive.

4 Tenterden will continue to serve the south western part of the Borough as a principal rural service centre by retaining its shops and services, conserving and enhancing its historic centre and accommodating development of a suitable scale, design and character within, and to the north of, the town.

5 The other rural service centres of Charing, Hamstreet and Wye will be maintained through retaining shops and services, conserving and enhancing their historic centres and the delivery of limited development.

6 The identity, attractiveness and vibrancy of the Borough's rural area, in the form of its range of attractive settlements, wealth of heritage assets and its expansive countryside – containing the Kent Downs AONB to the north and the High Weald AONB to the south - will be protected and, where possible, enhanced.

7 The Boroughs green spaces will be protected and enhanced to serve expanding populations including two new strategic parks at Ashford and the promotion of sporting and recreational hubs in accessible locations; the retention of flood storage areas; reinforcement of wildlife corridors and an improved cycle network to foster healthier lifestyles for residents and workers.

8 A positive approach to the adaption of climate change will be secured by avoiding development in areas at greatest risk of flooding; protecting and enhancing green networks and promoting sustainable drainage and challenging water efficiency standards.

3.2.2 Table 4 tests the draft Local Plan Spatial Vision against the SA objectives in accordance with the scoring systems set out in the key at Table 5 overleaf.

Table 4 – Testing of Local Plan Vision against SA objectives

	Local Plan Vision							
SA objectives	1	2	3	4	5	6	7	8
1	Green	Light Green	Light Green	Light Green	Light Green	Light Green	Green	Green
2	Green	Green	Green	Green	Green	Green	Light Green	Light Green
3	Green	Light Green	Green	Green	Green	Green	Light Green	Light Green
4	Green	Blue	Blue	Blue	Blue	Light Green	Green	Green
5	Green	Green	Green	Green	Green	Light Green	Blue	Green
6	Green	Light Green	Green	Green	Green	Light Green	Yellow	Green
7	Green	Light Green	Light Green	Blue	Blue	Light Green	Green	Green
8	Green	Light Green	Light Green	Light Green	Light Green	Yellow	Green	Green
9	Green	Blue	Blue	Blue	Blue	Blue	Green	Light Green
10	Light Green	Green	Green	Light Green	Light Green	Green	Green	Green
11	Light Green	Green	Green	Light Green	Light Green	Green	Yellow	Green
12	Green	Green	Green	Light Green	Light Green	Light Green	Blue	Green
13	Light Green	Green	Green	Green	Green	Yellow	Yellow	Light Green

Table 5 – Key for testing of Local Plan Vision against SA objectives

Key	
	Local Plan Vision directly promotes SA objective (directly compatible)
	Local Plan Vision indirectly promotes SA objective (indirectly compatible)
	Local Plan Vision has no link/no impact on the SA objective
	Local Plan Vision indirectly contradicts SA objective
	Local Plan Vision directly contradicts SA objective
	Link depends on implementation of Local Plan Vision

3.2.3 The appraisal of the compatibility between the Local Plan Spatial Vision and the SA objectives has revealed no contradictions. The Local Plan Spatial Vision either directly or indirectly promotes the SA objectives or has no impact on them. In some cases, it will depend on how the Local Plan Vision is implemented. In reality, the implementation will be guided by other parts of the Vision which will help ensure sustainable implementation of the objective. The Vision should be read as a whole.

3.2.4 Overall, there is good compatibility between the Local Plan Spatial Vision and the SA objectives.

3.3 Appraisal of Local Plan Strategic Objectives

3.3.1 To deliver the Vision, a number of strategic objectives have been developed. They form the basis of the draft Local Plan’s policy framework, as well as providing the core principles that planning applications are expected to adhere to. The strategic objectives are set overleaf.

3.3.2 The objectives of the Local Plan set the framework for the development of policies. For this reason, it is important to ensure that they are in accordance with sustainability principles. It is therefore helpful to ‘test’ the Local Plan objectives for compatibility with the SA objectives developed for the purposes of undertaking the appraisal. The Local Plan objectives should also be consistent with each other and appraisal against the SA objectives will be one way to understand this relationship.

3.3.3 Table 6 overleaf, sets out the testing of the Local Plan objectives against the SA objectives, in accordance with the scoring systems set out in Table 5 overleaf.

Local Plan Strategic 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
- b) To protect and enhance the Borough's historic and natural environment including its built heritage and biodiversity;
- c) To create the highest quality design which is sustainable, accessible, safe and promotes a positive sense of place through the design of the built form, the relationship of buildings with each other and the spaces around them, and which responds to the prevailing character of the area;
- d) To ensure development is supported by the necessary social, community, physical and e-technology infrastructure, facilities and services with any necessary improvements brought forward in a co-ordinated and timely manner;
- 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;
- f) To 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 Traveller community and large quality family housing
- g) To provide a range of employment opportunities to respond to the needs of business, support the growing population and attract inward investment.

Table 6 – Testing the Local Plan Objectives against the SA objectives

	Local Plan objectives						
SA objectives	a	b	c	d	e	f	g
1	Blue	Green	Yellow	Blue	Yellow	Blue	Blue
2	Light Green	Green	Green	Yellow	Yellow	Blue	Blue
3	Blue	Green	Green	Blue	Yellow	Blue	Blue
4	Green	Light Green	Light Green	Light Green	Green	Blue	Blue
5	Green	Blue	Green	Light Green	Light Green	Green	Yellow
6	Green	Yellow	Green	Green	Green	Blue	Blue
7	Green	Light Green	Yellow	Green	Green	Light Green	Light Green
8	Green	Yellow	Light Green	Green	Green	Blue	Blue
9	Green	Yellow	Yellow	Green	Green	Blue	Blue
10	Green	Light Green	Blue	Blue	Blue	Blue	Blue
11	Light Green	Green	Yellow	Blue	Yellow	Blue	Blue
12	Green	Blue	Green	Light Green	Light Green	Yellow	Green
13	Light Green	Yellow	Green	Light Green	Light Green	Blue	Blue

3.3.4 The appraisal of the compatibility between the Local Plan objectives and the SA objectives has revealed no contradictions. The Local Plan objectives either directly or indirectly promote the SA objectives or have no impact on them. In some cases, it will depend on how the Local Plan objective is implemented. For example, Local Plan objectives f and g (which relate to the provision of new housing and employment opportunities respectively) may not on their own protect and enhance biodiversity; respond appropriately to, and enhance, landscape/ townscape character, quality and topography; conserve and enhance sites of cultural heritage or encourage modal shift and enhance connectivity between communities and town/ district centres. However, other Local Plan objectives would ensure such an approach would be followed. The objectives should be read as a whole.

3.3.5 Overall, there is good compatibility between the Local Plan objectives and the SA objectives.

3.4 Appraisal of Local Plan Strategic Proposals and Development Options

3.4.1 This Part of the SA/ SEA describes how, in preparing the Submission Local Plan, there has been an appraisal of reasonable alternatives. The SEA Directive requires the appraisal to appraise 'reasonable alternatives'. The likely significant effects on the environment of implementing the Local Plan and reasonable alternatives taking into account the objectives and the geographical scope of the plan, should be identified, described and evaluated (Article 5(1) of the Directive). The rationale for each option should also be clearly recorded; the environmental report must include an outline of the reasons for selecting the preferred alternative (Annex I (h) of the Directive).

3.4.2 In identifying and appraising reasonable alternative approaches to planning Ashford Borough over the period to 2030, it is necessary to examine the options for:

- economic growth
- housing growth
- strategic distribution of housing and employment development within the Borough
- strategic distribution of housing and employment development within the Ashford urban area

3.4.3 Such options should be tested against the Local Plan objectives and the sustainability objectives identified in the SEA.

3.5 The number of jobs to be created

What are the reasonable alternatives?

- 3.5.1 A number of strategic options for employment growth were considered by the Borough Council based on the Strategic Employment Options Report, 2012 prepared by GL Hearn. The report indicates that the Scenarios together can be considered as providing a realistic range for future employment growth.
- 3.5.2 **Alternative 1.1 - Baseline Projection:** The baseline projection indicates growth in employment of 12,400 jobs over the 2010-30 period based on what was considered in 2012 to be a potentially optimistic economic outlook but did not take account of any specific, local opportunities which exist in Ashford Borough for 'above trend' performance in key sectors. To serve this level of growth would require some 13,965 dwellings.
- 3.5.3 **Alternative 1.2 - Downside Risks Scenario:** The Downside Risks Scenario indicates growth in employment of 9,200 jobs over the 2010-30 period. This Scenario takes account of weaker macro growth forecasts, as well as the prospect of continuing restrictions on bank lending in the short-term which could influence both business investment and lending to homeowners (and thus the housing market). It also took account of the latest Office for Budget Responsibility (OBR) forecasts for public spending. The report concludes that the Borough's economy could perform better than this based in particular on the Borough's strategic accessibility, should the Council elect to take a positive approach to economic growth and development. To serve this level of growth would require 11,549 dwellings.
- 3.5.4 **Alternative 1.3 - Enhanced Performance:** The Enhanced Performance Scenario indicates stronger growth in employment of 15,900 jobs over the 2010-30 period. This Scenario assumes much stronger growth in office-based services in particular and stronger performance of the manufacturing sector (which thus sheds less jobs). The report identifies a number of clear risks to delivery of this scenario. It requires a significant uplift in take-up of office floorspace to be achieved. Office take-up would need to increase to around 1.7 times the pre-recession trend. Land allocated for B1a/b would need to be almost twice the amount required in the Baseline scenario. To achieve this Scenario would also require further industrial land to come forward post 2020. This could either be through resolving infrastructure constraints through delivery of Junction 10A or allocation of alternative sites not constrained by this. It also assumes the retention and growth of key manufacturing employers against a context of competition overseas and from areas within the UK which benefit from Assisted Area Status or Enterprise Zone benefits. Risks to the viability and delivery of new development within Ashford Town Centre, were also identified particularly in

the short-term should the economic climate worsen. In order to serve this level of growth 16,885 dwellings would be required.

- 3.5.5 **Alternative 1.4 - Enhanced Productivity Scenario:** The Enhanced Productivity Scenario modifies the Enhanced Performance Scenario to focus on higher-value added sectors and assess how feasible it is for the Borough to achieve productivity improvements in line with regional trends. It forecasts employment growth of 14,300 jobs over the 2010-30 period. The Scenario sees stronger performance of the manufacturing sector and strong growth in office-based sectors. The risks to achieving this scenario are similar to those in the Enhanced Performance Scenario, particularly in respect of developing the office market. In planning terms the ability to distinguish the end user of allocated business sites is extremely limited and although the aim may be to attract higher-value added employment sectors in reality it would not be feasible to limit consents to such uses. In order to serve this level of growth 15,825 dwellings would be required.
- 3.5.6 In addition, the report concludes that a 25% increase over the numerically predicted employment floorspace requirements for each scenario would allow flexibility and choice of sites and represents an appropriate approach to employment site allocations in the Borough.

Appraisal of Development Options against Local Plan Objectives

- 3.5.7 It is necessary for the SA/ SEA to examine the impacts of each scenario to assist the Borough Council in selecting an appropriate jobs target. The scenarios are first tested against the Local Plan objectives and then the SA/ SEA objectives.
- 3.5.8 In accordance with Local Plan objective (g), all scenarios would provide a range of employment opportunities to support the growing population and attract inward investment.
- 3.5.9 The Enhanced Performance and Enhanced Productivity scenarios would create the widest range of employment opportunities by requiring the allocation of almost twice the amount of land for B1a/b floorspace and over 20ha additional land for all B-Class Uses compared with the Downside Risks Scenario. Nevertheless these scenarios require in part an enhanced economic performance in the rural parts of the Borough and this would run counter to the Local Plan objective (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. Similarly, given the need for significant land which of necessity would be at the edge of settlements, such scenarios would be less likely to achieve Local Plan objective (e) To promote access to a wide choice of easy to use forms of sustainable transport modes. Finally, the significant additional land required to achieve these scenarios would make it more difficult to protect and,

if applicable, enhance the Borough's historic and natural environment including its built heritage and biodiversity as sought by Local Plan objective (b).

3.5.10 The Downside Risks Scenario would create the most limited range of employment opportunities within the Borough resulting in allocations of 22.4ha – 29.5ha less than the Enhanced Performance and Enhanced Productivity scenarios respectively. The significantly reduced amount of land required to achieve this scenarios would make it more likely to be able to protect and, if applicable, enhance the Borough's historic and natural environment including its built heritage and biodiversity as sought by Local Plan objective (b) and to meet Local Plan objective (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 and (e) promoting sustainable transport options.

3.5.11 The Baseline Scenario would provide a range of employment opportunities greater than the Downside Risks Scenario but less than the Enhanced Performance and Enhanced Productivity scenarios. The scenario does not rely on an enhanced economic performance in the rural parts of the Borough and would therefore meet Local Plan objective (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 and objective (e) of promoting sustainable transport options. Finally, the scenario would require more additional land than the Downside Risks Scenario but significantly less than the Enhanced Performance and Enhanced Productivity scenarios. There may therefore be some impact on protecting and, if applicable, enhancing the Borough's historic and natural environment including its built heritage and biodiversity as sought by Local Plan objective (b) but the impact would not be likely to be as great as the Enhanced Performance and Enhanced Productivity scenarios.

Appraisal of Development Options against SA Objectives

3.5.12 Table 7 overleaf sets out the assessment of the employment scenarios against the SA Objectives (refer to key set out in Table 8 overleaf)

Table 7 – Assessment of Employment Scenarios against the SA Objectives

Employment Scenarios	Alternative 1.1 Downside Risks	Alternative 1.2 Baseline	Alternative 1.3 Enhanced Performance	Alternative 1.4 Enhanced Productivity
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.	0	0	0	0
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.	++	++	+	+

Table 8 – Key to scoring of strategic proposals and options

SCORE	DESCRIPTION	SYMBOL
Significant Positive Effect	The proposed policy contributes significantly to the achievement of the objective	++
Minor Positive Effect	The proposed policy contributes to the achievement of the objective but not significantly	+
Neutral	The proposed policy does not have any effect on the achievement of the objective	0
Minor Negative Effect	The proposed policy detracts from the achievement of the objective but not significantly	-
Significant Negative Effect	The proposed policy detracts significantly from the achievement of the objective	--
No Relationship	There is no clear relationship between the proposed policy and the achievement of the objective or the relationship is negligible	/
Uncertain	The effect on the objective is uncertain and subject to implementation	?

3.5.13 It can be seen that the Downside Risks and Baseline scenarios are likely to have the least negative impact on the environment of the Borough and be the most likely to encourage modal shift. These scenarios 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. Whilst the Enhanced Performance and Enhanced Productivity scenarios would be likely to facilitate greater economic growth and high quality employment opportunities than the Downside Risks and Baseline scenarios, they 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 scenario is equally scored as contributing to the achievement of the objective. The significant additional land take for the Enhanced Performance and Enhanced Productivity scenarios is also likely to result in greater negative impact on the landscape, cultural heritage and biodiversity of the Borough.

3.5.14 In conclusion, whilst the Downside Risks and Baseline scenarios would create fewer jobs than the Enhanced Performance and Enhanced Productivity scenarios, the job opportunities would 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. In determining the preferred option clearly the Downside Risks scenario would create substantially lower job opportunities than the Baseline scenario – whilst also having slightly lower environmental impacts. Given this balance, it would seem prudent to set an employment target that is aspirational and deliverable whilst having fewer negative environmental impacts than the higher growth scenarios.

3.5.15 For the reasons set out above the preferred alternative for the Local Plan is a jobs target based on the Baseline scenario of 12,400 new jobs over the Plan period.

3.6 The number of homes to be developed

What are the reasonable alternatives?

3.6.1 A number of strategic alternatives for the amount of housing development were considered by the Borough Council based on the Strategic Housing Market Assessment (SHMA), 2015 prepared by GL Hearn. The report indicates a number of alternative scenarios for determining the appropriate level of housing locally.

3.6.2 **Alternative 2.1 - Meeting Objectively Assessed Need:** The SHMA assesses the implications of the 2012-based household projections and recommends a total 'objectively assessed Need' (OAN) housing provision of 13,799 dwellings for the borough between 2011-30 (annualised at an average of 727 dwellings per annum). This figure includes a small uplift to accommodate the 'market signals' test as there is some limited evidence of reduced affordability of market property over time.

3.6.3 **Alternative 2.2 - Meeting Objectively Assessed Need with some additional housing to help accommodate migration from London:** In London, the recently adopted Further Alterations to the London Plan (FALP) indicates that the capital will not be able to meet its planned housing requirements in the longer run, although predictions vary as to the scale of the potential undersupply. Some elements of in-migration from London to Ashford are accounted for in the OAN figure but the GLA predict that net out-migration from London will return to pre-recessionary levels soon and therefore, there is a case to say that SE Districts should be planning for this additional in-migration in their emerging Plans.

3.6.4 It is certainly conceivable that Ashford, with its high speed rail connection to the capital, might be seen by London residents as one of the locations in the south east most capable of providing attractive accommodation at reasonable cost yet within easy commuting range. As such, market pressure from Londoners looking to

relocate here in the future might be expected to push up house prices locally if no additional supply is planned.

- 3.6.5 The SHMA models a scenario of potential future in-migration flows to Ashford from London based on an adjustment to migration levels post 2017 which is broadly consistent with the approach adopted by the GLA in their FALP-related population projections. This scenario calculates a need for an additional 55 dwellings per annum from 2017 (715 dwellings total).
- 3.6.6 **Alternative 2.3 - Meeting Objectively Assessed Need with an uplift to achieve planned job growth:** As set out above, it is recommended that the most appropriate strategy is to plan for employment growth in the borough based on the baseline trajectory set out in the 2012 SEOR.
- 3.6.7 The SHMA report shows the expected growth in population under this scenario to be 25,821 over the Local Plan period. This equates to a housing need of 13,965 dwellings (equivalent to 735 per annum) which is marginally higher than the annualised OAN figure of 727 pa.
- 3.6.8 **Alternative 2.4 - Meeting the housing need of the Enhanced Performance/Productivity Employment Scenarios:** The SHMA identifies a significantly higher housing need of 16,855 dwellings to support stronger growth in employment of 15,900 (the Enhanced Performance Scenario) and 15,825 dwellings to support employment growth of 14,300 jobs (Enhanced Productivity Scenario). These options compare with the Baseline Projection which identifies a need of 13,965 dwellings to achieve growth in employment of 12,400 jobs. Both these options are likely to have a broadly similar impact on sustainability objectives and are tested as a single option representing the higher end of the range of employment scenarios.

The unreasonable alternatives

- 3.6.9 **Not meeting Objectively Assessed Housing Need:** 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.
- 3.6.10 The option of setting a housing target lower than the objectively assessed need would only represent a reasonable alternative where there are significant environmental, infrastructure or planning policy constraints, such as the Green Belt, that would justify reducing the housing OAN figure.

- 3.6.11 The large majority of Ashford's Core Strategy growth is centred in and around Ashford itself and much work was carried out to identify potential infrastructure constraints that could limit growth in the area in advance of the Core Strategy being adopted. Some of this infrastructure has come forward since then (e.g. upgrade to M20 Junction 9 and Drivers roundabout), whilst some is still in the planning stage, albeit with more national commitment now (e.g. Junction 10a). Whilst delivery of infrastructure is crucial to the delivery of new housing and the services that will support the residents of that new housing, there is no reason to believe that there would be any fundamental infrastructure constraint that would justify reducing the housing OAN figure.
- 3.6.12 In environmental terms, whilst there are two Areas of Outstanding Natural Beauty in the borough as well as areas with flooding constraints, there are large areas without national landscape or environmental designation or actual physical constraint. As such, there is no fundamental environmental constraint that would justify reducing the OAN figure.
- 3.6.13 There are no overriding national planning policy designations such as the Green Belt affecting the Borough.
- 3.6.14 On the basis of the above analysis, not meeting the Borough's objectively assessed housing need is not considered to be a reasonable option.
- 3.6.15 **Meeting Objectively Assessed Need with a significant uplift to assist affordable housing provision:** The SHMA suggests that of the overall 13,813 dwellings OAN figure, 6,253 dwellings (equivalent to 368 per annum - reducing to 335 per annum once the development pipeline is included) should be for 'affordable' housing. This represents about 45% of the overall total.
- 3.6.16 One of the tests in Government guidance is whether housing supply needs to be raised to tackle affordability, either through changing the supply / demand balance and hence reduced house prices, or, more directly, through a proportion of more sites being built out as 'affordable'.
- 3.6.17 The SHMA identifies two key factors against which the assessment of affordable housing need must be put into context. Firstly, in practice there are likely to be households who are adequately housed whilst paying more than the 30% of income threshold used in this report. Secondly, evidence shows that in Ashford Borough the private rented sector currently makes a significant contribution to meeting affordable housing needs with an estimated 246 lettings per annum in this sector to households supported by Local Housing Allowance (LHA).
- 3.6.18 The affordability of housing is not just influenced by the supply of housing but by other critical factors such as household incomes, welfare benefits and the mortgage

market which are outside the remit of the Local Plan. The Government's intended changes to the 'Right-to-buy' regime and 'Starter home' provision may also have significant implications for this issue.

3.6.19 Overall the affordable housing need's evidence provides some justification for considering a modest adjustment to identified housing need to improve affordability. However, the objectively assessed need already includes a small uplift to accommodate the 'market signals' test as there is some limited evidence of reduced affordability of market property over time. A significant increase in the Local Plan housing target to meet affordable housing need is therefore not considered to be a necessary or reasonable alternative.

Appraisal of Development Options against Local Plan Objectives

3.6.20 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.

3.6.21 In accordance with Local Plan objective (f) all the reasonable 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.

3.6.22 Whilst uplifting provision to accommodate migration from London may not appear to be directly meeting the housing needs of the Borough, not providing for such an anticipated demand may result in higher housing costs locally to the detriment of meeting local housing need – particularly for affordable housing. Consequently this option would help meet the changing housing needs of the Borough's population, including affordable housing. The consequence of this option is an additional 715 dwellings. As the opportunities for allocating brownfield sites have been maximised and site densities optimised, such allocations would have to rely on greenfield sites. As it is envisaged that the demand would be from London commuters, such additional demand should be located at the edge of Ashford. This would align with Local Plan objective (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. Similarly, this would be likely to achieve Local Plan objective (e) To promote access to a wide choice of easy to use forms of sustainable transport modes. Finally, the additional land required to achieve this scenario would be likely to have only minor additional negative impact on protecting and, if applicable, enhancing the Borough's historic and natural environment including its built heritage and biodiversity as sought by Local Plan objective (b).

3.6.23 Uplifting the housing provision significantly to meet housing need of the Enhanced Performance/ Productivity Employment Scenario would be likely to require significant additional land. As the opportunities for allocating brownfield sites have been maximised and site densities optimised, such allocations would have to rely on greenfield sites. The significant additional land required to achieve this scenarios would make it more difficult to protect and, if applicable, enhance the Borough’s historic and natural environment including its built heritage and biodiversity as sought by Local Plan objective (b).

3.6.24 Uplifting the housing provision to achieve the Baseline Employment Scenario would result in marginally increasing the housing provision by an additional 150 dwellings. The very limited additional land required to achieve this scenario would limit any adverse impact on protecting and, if applicable, enhancing the Borough’s historic and natural environment including its built heritage and biodiversity as sought by Local Plan objective (b). Importantly, this scenario would have a positive impact on Local Plan objective (g) To provide a range of employment opportunities to support the growing population and attract inward investment.

Appraisal of Development Options against SA Objectives

3.6.25 Table 9 sets out the assessment of the housing scenarios against the SA Objectives (refer to key set out in Table 8)

Table 9 – Assessment of Housing Scenarios against the SA Objectives

Housing Scenarios	Alternative 2.1 Meeting Objectively Assessed Need (OAN)	Alternative 2.2 Meeting OAN with some additional housing to help accommodate London migration	Alternative 2.3 Meeting OAN with some additional housing to achieve Baseline Employment Scenario	Alternative 2.4 Meeting housing need of Enhanced Performance/ Productivity Employment Scenario
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.	?	?	?	?

3.6.26 Clearly all scenarios ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs. The range of provision between scenarios is 13799 - 16,855 dwellings and so each alternative would have a significant positive effect on this objective.

3.6.27 It is likely that Alternative 2.1 (Meeting Objectively Assessed Need (OAN)); Alternative 2." (Meeting OAN and helping to accommodate migration from London) and Alternative 2.3 (Meeting OAN with an uplift to achieve the Baseline Employment scenario) would all be likely to have a lower negative impact on the environment of the Borough than the Enhanced Performance/ Productivity Employment Scenario. Whilst a significant area of housing land will be required to meet the objectively assessed need, the additional land required to achieve the Baseline employment scenario and contribute to London's housing need is marginal and would not significantly increase the 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. The amount of land required to uplift the housing supply to meet the needs of the Enhanced Performance/ Productivity Employment Scenario would be likely to have a significant negative impact on these objectives.

- 3.6.28 Whilst most scenarios would facilitate sustainable economic growth and high quality employment opportunities, increasing housing supply to meet the needs of the Enhanced Performance/ Productivity Employment Scenario would be able to support higher economic growth and have a significant positive effect on this objective.
- 3.6.29 The impact on several objectives is uncertain as much would depend on the distribution of development proposed.
- 3.6.30 In conclusion, all scenarios can be shown to have a significant positive effect on the delivery of a mix of good quality, sustainably constructed homes to meet identified needs. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. It can be argued that the additional supply planned to meet employment growth and potential demand from London gives the local market some flexibility over the objectively assessed housing need. Cumulatively, meeting OAN and an uplift to achieve Baseline employment growth as well as helping to accommodate London migration contributing towards the housing needs of London would give this flexibility whilst having only marginally greater environmental impact than simply Meeting Objectively Assessed Need. An uplift to meet the needs of the Enhanced Performance/ Productivity Employment Scenario has significant negative impacts on the environment.
- 3.6.31 For the reasons set out above the preferred alternative for the Local Plan is a housing provision of 14,680 dwellings over the Plan period (773 dpa) made up of 13,813 dwellings supporting objectively assessed need, 152 dwellings uplift to support employment and 715 dwellings uplift to help accommodate London migration.

3.7 The cumulative impact of employment and housing growth

What are the reasonable alternatives?

- 3.7.1 A number of strategic options for employment growth were considered by the Borough Council based on the Strategic Employment Options Report, 2012 prepared by GL Hearn. The report indicates that the Scenarios together can be considered as providing a realistic range for future employment growth. Similarly, a number of strategic options for the amount of housing development were considered based on the Strategic Housing Market Assessment (SHMA), 2015 also prepared by GL Hearn. As well as testing the impacts of employment growth and housing growth separately on sustainability objectives, it is important to test the cumulative impact of these scenarios. In doing so, it has been assumed that housing and employment growth would be reasonably aligned with each other (as

shown in Table 19 of the SHMA). Thus the two reasonably balanced options which test two alternative scenarios are:

- 3.7.2 **Alternative 3.1 - The Baseline Employment Scenario with Housing Provision to Meet Objectively Assessed Need with an uplift to achieve the Baseline Employment Scenario; and London migration:** The Baseline Employment Scenario with Housing Provision to Meet Objectively Assessed Need with an uplift to achieve the Baseline Employment Scenario; assist affordable housing provision and London migration identifies a need of 14,680 dwellings to achieve growth in employment of 12,400 jobs.
- 3.7.3 **Alternative 3.2 - The Enhanced Performance/ Productivity Employment Scenarios with sufficient housing to serve employment needs:** The SHMA identifies a significantly higher housing need of 16,885 dwellings to support stronger growth in employment of 15,900 (the Enhanced Performance Scenario) and 15,825 dwellings to support employment growth of 14,300 jobs (Enhanced Productivity Scenario). Both these options are likely to have a broadly similar impact on sustainability objectives and are tested as a single option representing the higher end of the range of employment and housing scenarios.

Unreasonable alternatives

- 3.7.4 Selecting options which provided an imbalanced growth between housing and employment would not represent a reasonable alternative. Thus, meeting the objectively assessed need for housing without additional housing to meet employment growth would result in unrealised economic development unsupported by a local workforce or inward commuting. Similarly, setting an option for economic growth which would result in a need for housing below the objectively assessed need would not be a realistic option. For this reason, meeting the Baseline and Downside Risks Employment scenarios with only sufficient housing to support these scenarios have not been tested.

Appraisal of Development Options against Local Plan Objectives

- 3.7.5 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 employment and housing. The alternatives are first tested against the Local Plan objectives and then the SA/ SEA objectives.
- 3.7.6 In accordance with Local Plan objective (f) both the reasonable 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.

3.7.7 The housing uplift needed to support the Baseline employment scenario would have some impact on Local Plan objective (b) to protect and, if applicable, enhance the Borough’s historic and natural environment including its built heritage and biodiversity. Nevertheless, uplifting the housing provision to meet housing need of the Enhanced Performance/ Productivity Employment Scenario would be likely to require significant additional land. As the opportunities for allocating brownfield sites have been maximised and site densities optimised, such allocations would have to rely on greenfield sites. The significant additional land required to achieve this scenarios would make it more difficult to protect and, if applicable, enhance the Borough’s historic and natural environment including its built heritage and biodiversity as sought by the Local Plan objective.

3.7.8 Both scenarios would have a positive impact on Local Plan objective (g) To provide a range of employment opportunities to support the growing population and attract inward investment, although uplifting the housing provision significantly to meet housing need of the Enhanced Performance/ Productivity Employment would clearly have the most impact on this objective.

Appraisal of Development Options against SA Objectives

3.7.9 Table 10 sets out the assessment of the cumulative employment and housing scenarios against the SA Objectives (refer to key set out in Table 8)

Table 10 – Assessment of Cumulative employment and housing Scenarios against the SA Objectives

Employment/ Housing Scenarios	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	Alternative 3.2 Enhanced Performance/ Productivity Employment Scenarios with sufficient housing to serve employment needs
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.	++	+

3.7.10 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.

- 3.9.6 A range of alternatives therefore appear to be feasible in terms of distributing the new development at the edges of Ashford associated with the preferred levels of growth:
- 3.9.7 **Alternative 5.1 - Focus development in a single growth area to the north west of Ashford**
- 3.9.8 **Alternative 5.2 - Focus development in a single growth area to the south of Ashford**
- 3.9.9 **Alternative 5.3 - Disperse development around the periphery of Ashford (north; south; north east and south east)**

Appraisal of Development Options against Local Plan Objectives

- 3.9.10 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.
- 3.9.11 In accordance with Local Plan objective (f) all the alternatives would help 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.
- 3.9.12 Alternative 5.3 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... Dispersal is likely to result in housing and employment development closer to existing sustainable transport routes and other infrastructure and services than single growth areas which because of their size and need for significant advanced infrastructure investment are likely not to perform as well against these objectives particularly in the short and medium term.
- 3.9.13 The north west sector is close to the AONB and therefore likely not to meet Objective (b) To protect and, if applicable, enhance the Borough's historic and natural environment including its built heritage and biodiversity.

Appraisal of Development Options against SA Objectives

3.9.14 Table 12 sets out the assessment of the development distribution scenarios at Ashford Urban Area against the SA Objectives (refer to key set out in Table 8)

Table 12 – Assessment of Development Distribution at Ashford Urban Areas Scenarios against the SA Objectives

Strategic Distribution of housing and employment options at Ashford town	Alternative 5.1 Focus development in a single growth area to the north west of Ashford	Alternative 5.2 Focus development in a single growth area to the south of Ashford	Alternative 5.3 Disperse development around the periphery of Ashford
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.	0	-	?
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.	--	--	+

3.9.15 All alternatives are likely to help ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs although Alternatives 5.1 and 5.2 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. The scale and choice of sites available with this option is likely to limit this alternative from having significant positive effects on this objective.

3.9.16 In terms of employment opportunities, Alternatives 5.1 and 5.2 would have a positive impact on facilitating sustainable economic growth and high quality employment opportunities. In the case of Alternative 5.1, the north west area already contains Eureka Park and is likely to be an area attractive to business. Nevertheless, the scale and choice of sites available with this option is likely to limit this alternative from having significant positive effects on this objective. In the case of Alternative 5.2, the ability of a new growth area south of the town to attract a range of employment opportunities including significant development within Use Classes B1 – B8 is unknown but by definition the area would need to compete with existing markets such as the accessible location of Ashford town centre or sites well related to the motorway network. The location of Alternative 5.2 is likely to limit this alternative from having significant positive effects on this objective. Alternative

5.3 has the advantage of a range of sites (allowing for a greater scale of development) close to existing business parks and the motorway network and is likely to have significant positive effects on this objective.

- 3.9.17 In relation to access to education, health and community services, Alternative 5.3 would have a positive impact by dispersing housing and employment development closer to existing facilities and services with either existing capacity or the ability to expand to accommodate need. Single growth areas, because of their size and need for significant advanced infrastructure investment, are likely not to perform as well against these objectives particularly in the short and medium term. In the case of the north west sector, the area is poorly related to existing community infrastructure and would not perform well against this objective. The south sector is close to planned development with community infrastructure at Chilmington Green and would therefore only have a minor negative effect.
- 3.9.18 In terms of improving the health and quality of life for those living and working in the Borough, Alternative 5.3 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.
- 3.9.19 Populations would be well served by a range of existing green open spaces. The location of a significant growth area at the edge of Ashford 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. In the case of the north west sector, the scale of development on the sites available may limit the provision of services and the area is not well connected to existing or planned settlements or infrastructure and Alternative 5.1 would be likely to have a minor negative effect on this objective.
- 3.9.20 By dispersing development around the edge of Ashford closer to existing public transport and footpath/ cycleway routes, Alternative 5.3 would be likely to have a significant positive effect on encourage modal shift and enhancing connectivity between communities and town/ district centres. Alternatives 5.1 and 5.2 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 in the case of Alternative 5.2 which can connect into routes to serve Chilmington Green. Alternative 5.1 is located in a more remote sector away from existing and planned development and is predicted to have a minor negative impact on this objective.

- 3.9.21 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 met by Alternative 5.3. This disperses development to locations closer to district centres. By virtue of their locations and the potential to compete with existing centres, Alternatives 5.1 and 5.2 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.
- 3.9.22 In relation to protecting and making the most efficient and appropriate use of land, soils and geological assets, all options would rely almost entirely on significant greenfield land and would therefore have a significant negative impact on this objective.
- 3.9.23 In terms of ensuring the prudent use of resources, all alternatives will result in the loss of agricultural land and will have a negative impact on this objective. This would be more significant in relation to Alternative 5.1 (which relies on mostly Grade 2 agricultural land to the north west and Grade 3 agricultural land to the north, and Alternative 5.3 (which because of its dispersed nature could affect Grade 1, 2 or 3 agricultural land). Alternative 5.2 would rely primarily on Grade 3 agricultural land. 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.
- 3.9.24 With its reliance on greenfield sites, all alternatives would have a minor negative impact on biodiversity as all locations contain ancient woodland, trees, hedgerows and rivers/ streams.
- 3.9.25 In the same way, Alternatives 5.2 and 5.3 contain Flood Zone 3 and Alternative 5.1 is poorly related to sustainable transport facilities and so all have the potential to have a minor negative impact on helping to mitigate, and reduce the impact of, climate change and flooding.
- 3.9.26 The large scale growth areas of Alternatives 5.1 and 5.2 would be likely to have the greatest impact on the character and quality of the landscape with potential significant negative effects. Alternative 5.1 abuts the AONB and this would have a significant negative effect on the setting of this designated landscape. Whilst still having a minor negative impact on the landscape, Alternative 5.3 would represent smaller scale dispersed development, better integrated with existing or planned development and located away from the AONB.

3.9.27 Alternative 5.1 would have no impact on the objective to conserve and enhance sites of cultural heritage and archaeological importance. Alternatives 5.2 and 5.3 are located in areas with archaeological potential and until investigations are undertaken in relation to specific sites, the effect on this objective is uncertain. Nevertheless, the southern growth area would be located close to Kingsnorth Conservation Area and the impact of a significant growth area on the setting of the Conservation Area may cause a minor negative impact.

3.9.28 In conclusion, as options relying on greenfield sites, all have the potential to have negative impacts on biodiversity, landscape character and the use of agricultural land and resources. Alternative 5.3 has most beneficial effects on SA objectives – in particular the delivery of new homes and economic growth, the impact on modal shift and improving health. The two alternatives impact in similar ways to each other in that both focus development in large scale developments on the periphery of Ashford. Alternative 5.1 has six significant negative effects and four minor negative effects whereas Alternative 5.2 has four significant negative effects and five minor negative effects. For these reasons, Alternative 5.3 of dispersing development around the periphery of Ashford is considered to be the most sustainable alternative. Within these sectors it will be necessary to identify sites which would not have significant negative impact on biodiversity; landscape character; cultural heritage and archaeological importance, land within Flood Zone 2 and which were well related to sustainable transport modes and facilities and services.

4 SUSTAINABILITY APPRAISAL OF SITES

4.1 Introduction

- 4.1.1 The following section sets out Stage B of the Sustainability Appraisal process, in relation to the development sites proposed in the draft Local Plan, and their reasonable alternatives.
- 4.1.2 First the methodology for identifying sites and reasonable alternatives is set out, followed by an explanation of how the SA assessment has been carried out, including identifying issues with data collection and information.
- 4.1.3 This is followed by a summary of the reasons why particular sites have been selected over others, and how the SA assessments and other factors have been taken into account in making the decision.
- 4.1.4 Finally, the sustainability impact of the proposed site allocations is set out.

4.2 What are the reasonable alternatives?

- 4.2.1 The Strategic Housing and Employment Land Availability Assessment (SHELAA) identifies the sites which are achievable, deliverable, developable, and which might be suitable for allocation in the Local Plan.
- 4.2.2 This section should be read alongside the SHELAA 2016, which explains the process in more detail.
- 4.2.3 In summary, sites have been removed, as not having potential, through different levels of screening as set out below.
- Screening Part 1 – Assessment of availability, site size and ecological designations
 - Screening Part 2 – Location and physical limitation of the site and the impact on Landscape, Nature and Heritage
 - Screening Part 3 – Achievability and development potential
- 4.2.4 Sites that have been removed through these screening stages are not considered to be reasonable alternatives. The reasonable alternatives are those sites which have passed the three screenings, and meet all of the criteria, so are therefore considered to be developable and deliverable, i.e. the site is available, in a suitable

location for the proposed development, and there is a reasonable prospect that the site could be viably developed at the point envisaged in the plan period.⁴

4.2.5 Appendix 3 sets out the sites which are considered to be reasonable alternatives, and have been subject to site specific SA assessments.⁵

4.3 The appraisal and site selection process

4.3.1 As set out in Chapter 2 of this report, a site assessment proforma and related guidelines were produced as part of the scoping exercise, which form part of the SA Framework. This has been used to assess the individual sites. The majority of the site assessments were carried out between September 2014 and December 2014, and the information in them is correct as of that time.

4.3.2 Each site has been assessed and a conclusion has been provided. The conclusions to the individual SA assessments set out why the site is considered suitable for allocation in the draft Local Plan, and why sites have not been considered suitable for allocation in the draft Local Plan. The individual site assessments are set out in Appendix 3.

4.3.3 It is not possible to simply allocate sites with the highest SA score, as there are other factors which must be taken into account, as explained below.

4.3.4 At a high level, the site selection must be in accordance with the overall strategy of the draft Local Plan. As a starting point sites have been allocated in order to meet the overall need for housing and employment development as set out in Alternative 3.1 as explained in Chapter 3 of this report.

4.3.5 The sites allocated must also follow the distribution strategy set out in Alternatives 4.2 and 5.3 as set out in Chapter 3 of this report. In the Ashford Urban Area, where a large majority of growth is proposed to take place, a selection of sites has been chosen to accord with the strategy of dispersing development around the edge of Ashford, whilst avoiding the area close to the AONB to the north west of the town. In Tenterden and the villages proportionate growth is proposed, and in some cases there may be sites which are considered generally suitable for development, but which are not proposed to be allocated as this would be contrary to the overall strategy resulting in too much development for the individual village, relative to its

⁴ Some of these sites already have planning permission and have therefore not been considered for allocation. Some sites are located in Neighbourhood Planning Areas, and within these areas where The Neighbourhood Group have already started their own site analysis and processes for allocation within a Neighbourhood Plan, these sites are not considered for allocation. These sites are therefore also not considered as reasonable alternatives for the purposes of allocation in this Local Plan.

⁵ Some of the sites removed in Screening Part 2 have been subject to a site specific SA assessment, which was required in order to determine whether it should be removed at that stage, and are therefore not considered to be reasonable alternatives. A list of these sites and their assessments are provided at Appendix 4.

existing size, character and provision of services. This takes into account the delivery of housing in the village over the past few years and the amount of housing remaining to come forward from existing planning permissions and allocations in previous plans.

- 4.3.6 At the site assessment level, there are some criteria within the assessments which have more weight than others, but this is not reflected in the individual scores. Sites may be considered unsuitable for a single reason, for example flood risk, but still have scored highly for other reasons. Consideration must also be had to the subjective nature of some of the criteria. It is therefore not possible to simply select a site for allocation because it met a particular score.
- 4.3.7 It is also not possible to compare the scoring of sites in different areas of the Borough, for example those in Ashford Urban Area generally score highly as they are often brownfield sites, close to existing services and amenities and cannot be directly compared with the scores of the rural sites and the sites on the periphery of the Ashford urban area.
- 4.3.8 In addition, site size has determined how sites have been scored against some criteria. For the largest sites a judgement has been made in terms of their likelihood of providing their own services within the development, and where this was considered appropriate (and proposed by the site promoter), this has been taken into account when scoring the site against access to services criteria. Where two separate sites form a single allocation, one may have scored poorly as it has been considered on its own in the assessment and not as part of a larger development.
- 4.3.9 Further factors outside of the SA process have also been taken into account when making decisions over sites to be allocated. The Borough Council has placed great emphasis in the preparation of this Plan on working with local communities, particularly in the villages. Such engagement has contributed to the selection of a shortlist of sites, as well as the proposed site allocation/s.
- 4.3.10 In addition, consultation was carried out with Kent County Council Highways and Transportation, Kent County Council Education and Southern Water. In some cases sites have been ruled out for highway safety and access reasons, where they might have originally be considered appropriate.

Issues with data collection and information

- 4.3.11 There have been some technical difficulties with the site assessment in relation to availability of information as well as the timings of the assessments.
- 4.3.12 It has not been possible to score some sites against Question 4.3 as information regarding the suitability for SUDS infiltration systems has not been available for all

sites that were subject to an SA assessment. Where this was the case the question has been scored with a 0.

4.3.13 It is also important to note that the assessments were carried out at the end of 2014, and decisions regarding which sites to allocate have been made since that time. We are aware that there have been recent updates to certain information.

4.3.14 The Indices of Multiple Deprivation used in the assessment was those of 2010, with the IMD 2015 now being available. It is not considered that a change in this factor would influence the decision to allocate a site or not.

4.3.15 Flood Risk Zones are updated by the EA on a regular basis. The assessment used the information which was available at the time. There have only been minor changes to the Flood Risk Zones since then, which would not have resulted in any changes to the conclusions reached for individual sites.

4.3.16 Finally, assessments used the then Draft Kent Minerals Plan. This has now been adopted, in 2016. There are no significant changes in the adopted version which would have resulted in any changes to the conclusions reached in the site assessments.

4.4 Sustainability Impact of Proposed Site Allocations

4.4.1 The following section summarises the impact of the proposed site allocations, on an individual basis.

4.4.2 Table 13 sets out the sites which are proposed to be allocated in the draft Local Plan, the sustainability appraisal score and summary of their effects.

4.4.3 The cumulative effect of the proposed site policies is set out in Chapter 5 of this report, when considering the impact of the draft Local Plan policies SP2 and SP3.

Table 13 – Sustainability Impact of Proposed Site Allocations

Policy Ref	SHELAA site ref	Site Name	Summary of Sustainability Impact of Proposed Site Allocations and Mitigation
S1	VC47	Commercial Quarter	It has long been the Council's ambition for this site to play a key economic driving role to support wider growth in the town and its location and characteristics suggests that this remains a sound planning objective. It is a substantial, underused brownfield site in a highly sustainable location. The site is partially in the flood zone and green corridor, however these areas can be avoided as part of development, impact mitigated where necessary, and provides opportunities for environmental enhancements.
S2	KE2 and KE3	Land North-East of Willesborough Road, Kennington	This is a large site on the edge of the Ashford urban area at Kennington, it is greenfield, is relatively flat and has an open aspect out into the surrounding countryside which includes the Stour Valley and foreground to the North Downs AONB. There would therefore be some impact on the surrounding landscape. The site also includes higher grade agricultural land. However, the site scores well in terms of being close to community facilities, the edge of the urban area and existing infrastructure, being located on the edge of the existing settlement boundary. The policy also requires the provision of a primary school meeting the community's needs. A small area of the site is in the Flood Zone, however this can be avoided through any development.
S3	WS11	Court Lodge	The site is located on the edge of the urban area, so is close to many services. The site is large enough that development would create a requirement for its own services, and it is located adjacent to the Chilmington Green AAP boundary. Development of this site would create part of a strategic open space, as it would deliver part of Discovery Park strategic park. The site is currently open countryside, with key areas such as the Long Length tree lined avenue and development would change the landscape and setting of this countryside area. The site is also affected by flooding, however flood alleviation measures are proposed, which could also potentially

			improve the situation upstream, in south Ashford.
S4 and S5	WE16	Land North of Steeds Lane and Magpie Hall Road And Land South of Pound Lane	This site cover a large area, some being individual land parcels. Much of the site is open countryside and development would have a negative impact on this rural setting, landscape and character. A site of this size would be able to provide its own services and therefore scores well on access to services and in any event the site is relatively close to existing local services, particularly the parcel which is proposed to be allocated as policy S5. Bearing in mind the extent of the site some parts are suitable for development but the critical relationship to existing development and topography mitigates against development of the site in its entirety. This is set out in detail in the site policy, where large areas of open buffer land are proposed.
S6	AG7	Former Newtown Works	This is a significant brownfield site that scores very highly in the sustainability appraisal assessment. There are a number of important listed buildings on the site which will need to be retained and incorporated into any redevelopment scheme. Development of the site creates the opportunity to bring the listed buildings back into active use and improve the townscape, utilising a brownfield site in a highly accessible location close the existing services
S7	AG1	Former Klondyke Works	This site at Klondyke scores very highly on the sustainable appraisal. Due to the high score, this site would be suitable for use as a museum and equally for residential development. Development here would provide the opportunity to improve the landscape as well as bring forward a brownfield vacant site.
S8	ST3	Lower Queen's Road	This site has a long history of allocation and currently has an allocation in the Urban Sites and Infrastructure DPD. The site is in a sustainable location close to the town centre and is an opportunity to provide managed access to, and enhance part of the green corridor.
S9	ST8	Kennard Way, Henwood	This site is a large undeveloped area in the middle of the urban area of Ashford. Although the site has previously been allocated for employment uses, it has never come forward for such uses in the past. It is in an accessible location providing a good location

			for residential development. Part of the site is in Flood Zone 2 and ecological features exist, however these areas of the site can be left undeveloped and enhancement of ecological features can take place.
S10	VC17	Gasworks Lane	The site scores very well in the environmental sections of the SA assessment, being a previously developed site and currently vacant and underused. Redevelopment provides an opportunity to improve the character of the area and have a positive impact upon the vitality of Ashford Town Centre. Being located in close proximity to the town centre the site has excellent access to services and public transport. Whilst the site is located adjacent to the railway line, suitable mitigation can be provided to reduce any impact of noise upon potential future residents. Only small parts of site within flood zones 2 and 3, which can be easily avoided by any new development.
S11	VC4	Leacon Road	Redevelopment provides an opportunity to improve the character of the area and have a positive impact upon the vitality of Ashford Town Centre, being located in close proximity to it. It is a brownfield site and has excellent access to services and public transport. The site is currently underutilised employment premises so redevelopment provides the opportunity to create new employment and residential development on a previously developed site.
S12	BE17	Former K College, Jemmett Road	The new college site in the Town Centre is currently under construction and once the college has relocated this site is available for development. It is in the urban area of Ashford, previously developed, located close to existing services and public transport. The redevelopment of the site would have a positive impact on the townscape. There are protected trees on the site, which can be maintained within the development.
S13	BE16	Former Ashford South School, Jemmett Road	The site would be available for development in years 6-10 time after its temporary use for a primary school has expired and the K College site redevelopment adjacent to it is complete. The site is partly brownfield, in a highly accessible location within Ashford Urban area, close to existing services and facilities. Important trees on the site can be

			maintained through any development.
S14	WE5	Park Farm South East	This site adjoins existing development at Park Farm East (Bridgefield), Ashford and presents an opportunity to enhance and extend the green corridor and deliver facilities associated with a large site. The site is not particularly well related to existing services. Development of the site would intrude into the open countryside but by dealing with the topography of the site sympathetically the impact could be mitigated.
S15	WE21	Finberry North West	The site is currently greenfield land detached from the the Ashford urban area but in close proximity to development at Finberry and Bridgefield that is currently under construction. The context of the site has changed as a result of those adjoining developments which are providing a range of accessible local services and whilst the whole site is some distance from the main urban area the site scores relatively well.
S16	WE11	Waterbrook	This is a large site for development which scores relatively poorly because a part of the site falls within the flood plian and also the green corridor. Development of the whole area could avoid these constraints and achieve a mixed use development that would help deliver some benefits for the community in the form of an extended lorry park.
S17	NW7	Land at Willesborough Lees	This site has an existing allocation in the Urban Sites and Infrastructure DPD. The site has the potential to significantly improve access to the William Harvey Hospital by creating a link road from the A20 through the site to an existing gateway at the hospital in the north of the site. By closing access to the Hinxhill Road from Lacton Green this will significantly reduce local traffic using the Hinxhill Road as a rat run to villages north of the town. Developing the site also has the potential to improve pedestrian / cycleway access to the town centre, if pathways are improved to and around the M20 J10. Detailed proposals for the site can minimise any impact on woodland, landscape and the adjoining Conservation Area.
S18		William Harvey	This site allocation is a continuation of a previous allocation which allows proposals to improve,

		Hospital	expand, reconfigure and consolidate provision of health facilities on the site. The majority of the site is previously developed, the small area of undeveloped parts of the site are relatively prominent and there would be minor negative impact upon the landscape, however this could be mitigated through careful development proposals. The need to provide additional health facilities weighs heavily in favour of the site.
S19	NW3	Conningbrook Residential Phase 2	The site scores relatively well, being closely related to existing facilities and contained within the wider Conningbrook Strategic Park boundary and the facilities proposed there. The site has good accessibility, located directly on the A28 and adjacent to the existing Julie Rose Stadium entrance. The site is partly previously developed. The main negative impact will be the loss of woodland within the site, and any impact on associated biodiversity, however this can be mitigated through proposals on the wider Conningbrook Strategic Park site area.
S20	BBAE2	Eureka Park	This site scores well in terms of sustainability, being located within the Ashford urban area close to local facilities and services. The proposal will benefit the community by bringing forward additional employment space and informal public open space. The western part of the site is currently rural in nature so any development will impact on the landscape setting, although this should be minimal as it is relatively enclosed. This is a sustainable and suitable location for development - employment uses and the residential element of the proposal have been balanced so as to not prejudice the long term employment strategy for the town.
S21	HG3	Orbital Park	This is an established employment location, which is proposed for further employment development. The majority of the site is previously developed with limited plots available for development. The site contains an Ancient Scheduled monument, is relatively prominent from the A2070 and close to a local wildlife site, however any negative impacts can be mitigated through detailed development proposals.
S22	VC21	Chart Industrial Estate	This is an established employment location and is fully developed. It has been identified as a site with

			potential for redevelopment to provide higher density employment provision. The site is located adjacent to Flood Zone and Green Corridor, however any negative impacts can be mitigated through detailed development proposals and provide opportunities for environmental enhancements.
S23	ST6	Henwood Industrial Estate	This is an established employment location, with one small area of land available for development. It has also been identified as a site with potential for redevelopment to provide modern employment space. The site is located adjacent to Flood Zone however any negative impacts can be mitigated through detailed development proposals.
S24	TSTRW1	Tenterden Southern Extension Phase B	The site scores well on accessibility and access to services criteria, although scores fairly poorly in relation to its integration with the existing built form of the Town. However this is due to its assessment as a standalone site. This position needs to be placed in its correct context. This site was allocated in the Tenterden and Rural Sites DPD (2010) as part of a wider site allocation that included the TENT1 phase a land, located to the north. It was considered that in combination, these sites provided a good opportunity to deliver a sustainable extension to Tenterden without a significant impact on the quality of the surrounding landscape or the historic integrity of the Town.
S25	RTW2	Pickhill Business Village, Tenterden	Intensification of development for employment on this site is logical, but would have to be managed sensitively given the existing surrounding conditions and constraints on the site and beyond. The site is very far from services of Tenterden Town Centre and, with public transport infrequent, would be extremely reliant on the private car. Current development is incongruous with the surrounding landscape, but rural employment could be diversified through development. The site is suitable for further employment development related to the existing development.
S26	IO2	Appledore - The Street	This site is located in the centre of the village and has excellent access to services. There are some constraints such as flooding and hedgerow removal, however, these could be designed around, especially if only the frontage of the site is developed. The proposal would result in the loss of

			agricultural land however, it has good access, and offers employment and/or community gain through the village hall and doctors surgery. The site in relatively close proximity to the Ramsar site at Dungeness, Romney March and Rye Bay, and in accordance with the appropriate assessment screening will be required to consider and mitigate any impact through detailed development proposals.
S27	BD8	Biddenden - North Street	This site scores well on sustainability grounds as it is close to Biddenden High Street and local facilities and services. Although development would result in the loss of agricultural land and would have a negative impact in terms of visual amenity this would be fairly limited as the site is enclosed by mature trees / hedgerows. The proposal is also likely to bring forward community benefits through provision of community services.
S28	CH4	Charing - Northdown Service Station, Maidstone Road	This site and partly previously developed, although would result in the use of some agricultural land, it provides the opportunity to integrate the sporadic linear development on the A20 Maidstone Road into a more seamless entrance into the village and it would compliment the existing development site at Char 2 (Poppy Fields), as well as improve the setting of the AONB. Charing is a sustainable location for development as the village has good facilities and transport links. Development provides the opportunity for additional pedestrian links to the village centre.
S29	CH14	Charing - Land south of the Arthur Baker Playing Field	This site is an existing allocation in the Tenterden and Rural Sites DPD. The site will actively promote the use of the village recreation ground immediately north of the site. In addition, development of this site could mirror the development on the opposing side of and act as a natural boundary to development in this area of Charing. The site is adjacent to a local wildlife site, however development proposals can ensure there are no negative impacts and provide to opportunity for enhancements.
S30	WN2	Egerton – Land on New Road	This site is close to the centre of the village and all the services it has to offer and therefore is in a sustainable location, however the site would result in the loss of agricultural land. The allocation has been limited so that it does not extend further south into the countryside than existing built development. Whilst there will be some visual impact on views of the church and setting of the village, these can be minimised through design of the development as the land slopes down towards the church and is lower than the road.
S31	WS30	Hamstreet - Land North of St.	The site is currently open agricultural land and development will result in some negative impacts to landscape, views and the countryside setting.

		Mary's Close	However, the site is close to the railway station and in walking distance of all the facilities in this large village. It is also opposite Hamstreet Primary School, and has potential to provide an area of open/leisure space in this area of the village. Parking problems associated with school drop off and pick up times currently exist, however these must be mitigated and improved through development of the site. The site in relatively close proximity to the Ramsar site at Dungeness, Romney March and Rye Bay, and in accordance with the appropriate assessment screening will be required to consider and mitigate any impact through detailed development proposals
S32	WS37	Hamstreet - Land at Parker Farm	The site is currently allocated as HAM2 in the Tenterden and Rural sites DPD, restricted to be developed after 2016. Due to the topography of the surrounding countryside the development will only have a limited impact on the landscape setting and neighbouring occupiers. Since the previous allocation the flood risk data in this part of Hamstreet has changed, meaning that a larger proportion of the site now falls within the floodzone. The site is allocated for a reduced number of homes to ensure development can avoid areas at risk of flooding. The site in relatively close proximity to the Ramsar site at Dungeness, Romney March and Rye Bay, and in accordance with the appropriate assessment screening will be required to consider and mitigate any impact through detailed development proposals
S33	WC12	High Halden - Land at Hope House	This site is in a favourable location close to local amenities and services. The site has good access onto the A28 and slopes down from north to south so the site is not so exposed to the surrounding countryside as there are no far reaching views. There are a number of listed buildings adjacent to the site, and one adjoining however these are offset against post-war style housing to the east and north of the site so a minor negative effect should result.
S34	DW6	Hothfield - Land East of Coach Drive	The site is located at the entrance to the village of Hothfield. It is bounded by mature trees which are subject to a TPO, which will be maintained through development. Although there is likely to be some minor negative impact on landscape, this will be minimised as the site is generally well screened. The proposals provide the opportunity to help to sustain and support local services in the village, which has seen the loss of some services in recent years. The Local Nature Reserve of Hothfield Common is located to the north of the village and development proposals will be required to consider and mitigate any impact.
S35	WE39	Mersham - Land adjacent to	This site is in walking distance from village services. Development of this site would change the landscape and setting in this area of the village from

		Village Hall	Blind Lane, a very rural narrow road. The site is visible from this location and screening will be required, particularly as much of the current tree boundary on this edge would need to be removed to create the access. The development of this site offers a community gain in the form of village hall extension and additional parking for the village hall, and is well screened from the main road through the village.
S36	WS21	Shadoxhurst - Rear of Kings Head PH	Overall this site scores well in the environmental, heritage and biodiversity sections as there are no constraints on the site. The site is also located in the centre of the village, ensuring that the development does not extend into the countryside beyond. However, this site scores poorly on the access to services as Shadoxhurst is a relatively dispersed small village, and relies on nearby villages and the Town Centre for services, although the development provides the opportunity to potentially provide community benefits as part of the development, which would benefit the site and wider community.
S37	WN4	Smarden - Land adjacent to Village Hall	This site is located close to the services within the village and although the site is agricultural land, it does not have any other environmental constraints. The site allocation has been limited in size to minimise the impact on the landscape and views of the countryside and ensure development would be in keeping with the cul-de-sac developments along the opposite side of the road. A buffer strip is required to the adjoining village hall to ensure that the residential development is not overbearing to its use and amenity. Existing hedgerows and trees can be maintained and enhanced.
S38	SS7and SS54	Smeeth - Land south of Church Road	This site is on the edge of the confines of a settlement that offers a variety of services and therefore is sustainable. It is close to the school and the recreation and play facilities. There is limited development in this area of the village, and all is linear and low density, there would therefore be a minor negative impact on the landscape. However, it helps to provide a smoother transition between the main village and the sporadic linear development along Church Road, filling in an open gap in the frontage.
S39	WS25	Woodchurch - Lower Road	This site is centrally located in the village and scores highly in the Sustainability Appraisal, the main negative impact is the loss of agricultural land. Once planning permission was granted on WS29, the context of this site changed, it now provides an opportunity to infill the gap in the frontage on Lower Road and link the development to the Kirkwood Avenue development. Development of this site will

			also provide the opportunity to provide additional public footpaths to help integrate the village green area, with the rest of the village. Low densities are proposed to ensure development is in keeping with the surrounding area.
S40	WS28	Woodchurch - Front Road	This is a an existing allocation in the Tenterden and Rural Sites DPD, with close access to services and good transport links. Development here on the frontage can potentially continue the built form fronting Front Road in a logical manner. The site is adjacent to listed buildings and the Woodchurch Conservation Area, and the policy requires the design and layout to preserve and enhance its setting, with a low density development.
S41		Chilham - Mulberry Hill, Old Wives Lees	This site was considered unsuitable for development for general residential development due to its location being relatively poorly accessible. However the proposals would meet the need for exclusive homes, which is otherwise not provided for. Due to the requirements for very low density, large properties which are exceptionally designed and highly sustainable impact, impacts can be minimised.
S42		St. Michaels - Beechwood Farm	This site was considered unsuitable for development for general residential due to the number of protected trees the loss of which would be significantly harmful to the sites countryside setting. The allocation for exclusive homes provides the opportunity to maintain this setting, whilst meeting the need for exclusive homes.

5. APPRAISAL OF TOPIC POLICIES

5.1 Introduction

5.1.1 This chapter assesses the impact of the proposed topic policies of the draft Local Plan. Each policy has been scored against each of the 13 SA objectives according to the scoring system in Table 3. A commentary which considers cumulative effects has also been completed.

5.1.2 The Plan has 6 overarching Strategic Policies. Topic Policies are then set out in six sections – Housing, Employment and the Local Economy, Transport, the Natural and Built Environment, Community Facilities and Implementation. Given the tightly focused specific subject matter of many of the Topic Policies, there was often no clear relationship between the proposed policy and the achievement of a SA Objective, or the relationship was deemed to be negligible. This approach, which has been adopted in Sustainability Appraisals of previous DPDs produced by Ashford Borough Council and is made clear in the commentary of each table.

Table 14 - Scoring System Used in the SA of Plan Policies .

SCORE	DESCRIPTION	SYMBOL
Significant Positive Effect	The proposed policy contributes significantly to the achievement of the objective	++
Minor Positive Effect	The proposed policy contributes to the achievement of the objective but not significantly	+
Neutral	The proposed policy does not have any effect on the achievement of the objective	0
Minor Negative Effect	The proposed policy detracts from the achievement of the objective but not significantly	-
Significant Negative Effect	The proposed policy detracts significantly from the achievement of the objective	--
No Relationship	There is no clear relationship between the proposed policy and the achievement of the objective or the relationship is negligible	/

5.2 Strategic Policies

5.2.1 The appraisal of the vision, objectives (Policy SP1) of the Local Plan has been undertaken in Chapter 3 of this report 4.

5.2.2 The following assessments of policies SP2 and SP3 considers their impact, further expanding on the assessment of strategic alternatives carried out in Chapter 3, as further information is available since the original assessment was carried out, in relation to how the strategy will be implemented through other Local Plan policies. The following assessment therefore takes into consideration the cumulative effect of the site allocations which are proposed to meet the overall strategy, and should be read alongside the assessment in Chapter 3.

POLICY SP2 – THE STRATEGIC APPROACH TO HOUSING DELIVERY	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough’s areas of biodiversity importance.	0	Site allocations within the draft Local Plan have in the majority avoided areas of biodiversity importance. Where this has not been the case detailed proposals are able to mitigate any negative effect. There are also opportunities to enhance areas of biodiversity importance. The overall effect is therefore considered to be neutral
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	-	Due to the nature of the Borough and limited availability of brownfield sites it has not been possible to avoid areas of open countryside, where there will be negative impact upon the landscape. Development proposals will be required to mitigate this where possible through detailed design and layout of proposals. Although minor negative effects are likely to remain. Some allocations are able to enhance the townscape those on brownfield sites in the urban areas.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	-	In the main the proposals do not impact significantly upon cultural heritage and archaeological importance, but it has not been possible to avoid such areas completely, and there therefore may be some minor negative effect
4 To help mitigate, and reduce the impact of, climate change and flooding.	0	The majority of development sites have avoided areas at risk of flooding. Where sites have been identified in such areas, it is possible for the risks of flooding to be mitigated and in some cases improvements made to the risk of flooding. The proposals are likely to increase the demand for water, but other policies in the Plan are in place to mitigate this as far as possible. Locating development in the most accessible locations provides opportunities for transport by non-

		vehicular modes reducing potential for air pollution. There are a number of factors at play in the criteria, but overall the proposals are considered to have a neutral impact.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	The proposals ensure the delivery of a mix of good quality; sustainably constructed homes to meet identified needs, and would therefore have a significant positive effect.
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.	++	By locating a significant proportion of development at Ashford Urban area and by scaling development proportionately to the size of the settlement, this enables maximum access to existing services and facilities
7 To improve the health and quality of life for those living and working in the Borough.	++	Facilities are likely to be in close range increasing opportunities for access on foot or cycle. Populations would also be well served by a range of existing and new green open spaces
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	+	The strategy locates a large majority of development at Ashford which has the widest choice of sustainable modes of transport, providing a positive effect. There is also excellent connectivity by pedestrian and cycle.
9 To ensure that development responds appropriately to current and future infrastructure requirements	+	The strategy allows for existing social, green, transport and utilities infrastructure to be utilised and enhanced where necessary. Other policies in the Plan require additional infrastructure to be provided where it is required.
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	--	Due to the lack of availability of brownfield land, the strategy relies quite significantly upon the use of greenfield land and would therefore have significant negative impact on this objective
11 To ensure the prudent use of resources and the sustainable management of waste.	--	Due to the majority of agricultural land in the borough being classified as high grade the strategy relies upon the use of high grade agricultural land to deliver additional development and would therefore have significant negative impact on this objective
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.	++	The strategy for housing supports directly that for economic growth, by providing sufficient housing to meet the needs of a growing workforce and providing it in locations which are accessible to employment opportunities.
13 To improve and sustain the town and district centres' economic performance and	++	By locating a significant proportion of development at Ashford Urban area and by scaling development proportionately to the size of the settlement, this

vitality and maintain their roles within the Borough's retail hierarchy.		provides maximum opportunities to enhance the towns' economic performance whilst also supporting the centres of smaller settlements.
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POLICY SP3 – THE STRATEGIC APPROACH TO ECONOMIC DEVELOPMENT	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	0	Site allocations within the draft Local Plan have in the majority avoided areas of biodiversity importance. Where this has not been the case detailed proposals are able to mitigate any negative effect. There are also opportunities to enhance areas of biodiversity importance. The overall effect is therefore considered to be neutral
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	-	Due to the nature of the Borough and limited availability of brownfield sites it has not been possible to avoid areas of open countryside, where there will be negative impact upon the landscape. Development proposals will be required to mitigate this where possible through detailed design and layout of proposals. Although minor negative effects are likely to remain. Some allocations are able to enhance the townscape those on brownfield sites in the urban areas.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	-	In the main the proposals do not impact significantly upon cultural heritage and archaeological importance, but it has not been possible to avoid such areas completely, and there therefore may be some minor negative effect
4 To help mitigate, and reduce the impact of, climate change and flooding.	0	The majority of development sites have avoided areas at risk of flooding. Where sites have been identified in such areas, it is possible for the risks of flooding to be mitigated and in some cases improvements made to the risk of flooding. The proposals are likely to increase the demand for water, but other policies in the Plan are in place to mitigate this as far as possible. Locating development in the most accessible locations provides opportunities for transport by non-vehicular modes reducing potential for air pollution. There are a number of factors at play in the criteria, but overall the proposals are considered to have a neutral impact.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
6 To ensure that all groups of the Borough's population have access to services and facilities	++	By locating a significant proportion of development at Ashford Urban area and by scaling development proportionately to the size of the settlement, this

so that opportunities for social inclusion are maximised.		enables maximum access to existing services and facilities. Proposals for employment also look to expand and consolidate existing facilities.
7 To improve the health and quality of life for those living and working in the Borough.	++	Housing and other facilities are likely to be in close range increasing opportunities for access on foot or cycle. Populations would also be well served by a range of existing and new green open spaces
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	+	The strategy locates a large majority of development at Ashford which has the widest choice of sustainable modes of transport, providing a positive effect. There is also excellent connectivity by pedestrian and cycle. This is also where the majority of housing is proposed reducing the need to travel.
9 To ensure that development responds appropriately to current and future infrastructure requirements	+	The strategy allows for existing social, green, transport and utilities infrastructure to be utilised and enhanced where necessary. Other policies in the Plan require additional infrastructure to be provided where it is required.
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	--	Due to the lack of availability of brownfield land, the strategy relies quite significantly upon the use of greenfield land and would therefore have significant negative impact on this objective
11 To ensure the prudent use of resources and the sustainable management of waste.	--	Due to the majority of agricultural land in the borough being classified as high grade the strategy relies upon the use of high grade agricultural land to deliver additional development and would therefore have significant negative impact on this objective
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.	++	The strategy provides for the likely economic development needs of the Borough and its residents and provides these in sustainable locations.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	By locating a significant proportion of development at Ashford Urban area and by scaling development proportionately to the size of the settlement, this provides maximum opportunities to enhance the towns' economic performance whilst also supporting the centres of smaller settlements.

SP4 STRATEGIC APPROACH TO MEETING RETAIL AND LEISURE NEEDS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	This policy states that new retail and leisure developments should be met within existing settlements, specifically the Ashford Urban Area. This will work to ensure the protection of biodiversity importance in the borough contributing positively to the achievement of this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	This policy states that new retail and leisure developments should be met within existing settlements, specifically the Ashford Urban Area. This will work to ensure the new retail and leisure developments respond appropriate to the character of the area,contributing positively to the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	++	Delivery of the needs for new retail and leisure development will ensure that the Borough's population has access to services and facilities to maximise social inclusion.
7 To improve the health and quality of life for those living and working in the Borough.	++	The delivery of new retail and leisure facilities in the borough will contribute positively to the achievement of this objective.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	++	Ashford town centre is the most sustainable location in the borough and the expansion of its retail and leisure offer will facilitate additional employment opportunities here in line with this objective.
13 To improve and sustain the town and district centres'	++	The delivery of additional retail and leisure facilities in Ashford town centre will significantly

economic performance and vitality and maintain their roles within the Borough's retail hierarchy.		contribute to the objective of enhancing its vitality and its position at the top of the boroughs retail hierarchy.
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SP5 DELIVERING A SUSTAINABLE TOWN CENTRE	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	Development of Ashford town centre will focus new development within the existing built up area of the town and will help to ensure the protection of areas of biodiversity importance in the borough contributing positively to the achievement of this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	Development of Ashford town centre will focus new development within the existing built up area of the town enhancing its townscape character and contributing positively to the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	+	Additional housing within the town centre will deliver good quality new homes within the borough and will have a positive effect on this objective.
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.	++	The delivery of a vibrant mixed use town centre will help to ensure that the Borough's population has access to services and facilities to maximise social inclusion.
7 To improve the health and quality of life for those living and working in the Borough.	++	The delivery of a vibrant mixed use town centre will contribute positively to the achievement of this objective.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	++	Delivery of a mix of uses in the town centre, which is the most accessible location in the Borough, encourages modal shift, including through cycling and walking.
9 To ensure that development responds appropriately to current and future infrastructure requirements	0	Development proposals will be required where feasible to be supported by the infrastructure needed.
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	+	The majority of development sites within this policy area are previously developed, and by encouraging development here reduces the need for the use of Greenfield land elsewhere in the Borough.
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
12 To facilitate sustainable	++	Ashford town centre is the most sustainable

economic growth and high quality employment opportunities in accessible locations within the Borough and increase the skills base of Ashford's residents.		location in the borough and the expansion of its retail and leisure offer will facilitate additional employment opportunities here in line with this objective.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	The delivery of a thriving Ashford town centre will significantly contribute to the objective of enhancing its vitality and its position at the top of the boroughs retail hierarchy.

SP6 PROMOTING HIGH QUALITY DESIGN	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	High quality design, as required by Policy SP6, including the efficient use of natural resources, will have a positive effect on this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	High quality design as required by Policy SP6, will serve to enhance landscape and townscape character and have a positive effect on this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	+	High quality design as required by Policy SP6, will serve to conserve and enhance sites of heritage importance and have a positive effect on this objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	+	High quality design encouraged the use of sustainable construction methods having a positive effect on this objective.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	The strategic policy commitment to the delivery of high quality design in all new development will contribute significantly to this objective.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	The strategic policy commitment to the delivery of high quality design in all new development will contribute significantly to this objective
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable	/	No relationship

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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

5.3 Housing Policies

- 5.3.1 Housing policies set down the Local Plan's approach to the delivery of affordable, local needs and specialist needs housing, as well as traveller accommodation, self build dwellings, residential annexes, houses in multiple occupation and replacement dwellings in the countryside. Detailed internal and external space standards are established as well as accessibility criteria and specific standards for family scaled homes. The Council's position on residential development in the Ashford urban area, the rural settlements and the countryside is clarified.
- 5.3.2 Unsurprisingly, such policies have largely significant positive effects on housing and quality of life SA Objectives. There are mixed effects on objectives promoting the prudent use of resources and on sustaining the vitality of district centres with policies supporting development within the confines of existing settlements, including Ashford town centre, having a positive effect while Policy HOU5 that supports development in the open countryside is deemed to have a negative effect on such objectives.
- 5.3.3 Additional residential development has the potential for harmful impacts on areas of biodiversity importance, natural and historic landscapes. In the case of topic policies where such an impact is possible, mitigation wording to prevent significant negative effects arising from development coming forward under that policy are usually incorporated within the wording of the proposed policy itself.

HOU1 AFFORDABLE HOUSING	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to	++	This policy supports the delivery of additional affordable housing, including

meet identified needs.		starter homes, in the borough to meet identified need. It therefore contributes significantly to the achievement of this objective.
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.	+	This policy will increase the affordable housing stock in the Borough, reducing local housing waiting lists.
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

HOU2 LOCAL NEEDS/SPECIALIST HOUSING	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	0	This policy supports the delivery of housing on exception sites within and adjoining rural settlements. As such it could detract from the achievement of this objective. However the wording of the policy requires that development coming forward under this policy should not result in a significant adverse impact on the character of the area or the surrounding landscape. Such mitigation, whilst not specifically referring to areas of biodiversity importance results in a neutral effect on the achievement of this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	0	This policy supports the delivery of housing on exception sites within and adjoining rural settlements. As such it could detract from the achievement of this objective. However the wording of the policy requires that development coming forward under this policy should not result in a significant adverse impact on the character of the area or the surrounding landscape. Such mitigation results in the policy having a neutral effect on the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	-	Additional development outside of existing confines could have a negative effect on the achievement of this objective.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy promotes the delivery of well designed new housing to meet the requirements of those with local or specialist housing needs and thus will have a significantly positive effect on this objective.
6 To ensure that all groups of the Borough's population have access to services and facilities so that opportunities for social inclusion are	++	This policy supports the delivery of specialist housing, including that which meets the accommodation needs of a range of vulnerable people, thereby

maximised.		making a positive contribution to the achievement of this objective.
7 To improve the health and quality of life for those living and working in the Borough.	+	This policy specifically requires development to be well designed. This will serve to enhance the quality of the housing stock across the borough and thereby the quality of life of those living in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

HOU3 RESIDENTIAL DEVELOPMENT IN ASHFORD URBAN AREA	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	This policy supports new residential development within the Ashford urban Area where harm to areas of biodiversity importance, including the BOAs, is largely avoided. Furthermore the policy specifically requires that development

		coming forward through this policy should not result in significant harm to important biodiversity networks.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	Policy specifically requires that development coming forward through this policy should be compatible with the character and density of the area.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	++	This policy specifically requires that development coming forward through this policy should not result in significant harm to nearby heritage assets.
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy contributes to increasing the supply of housing in the Borough. It therefore will have a positive effect on the achievement of this objective.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	+	Development within the Ashford urban area for housing will reduce pressure for the development of high grade agricultural land and thus have a positive effect on this objective.
12 To facilitate sustainable economic growth and high quality employment opportunities in accessible locations	/	No relationship

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.	+	This policy supports the delivery of additional housing in the Ashford urban area which will contribute to it's vitality.

HOU4 RESIDENTIAL DEVELOPMENT IN THE RURAL SETTLEMENTS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	This policy supports new residential development within rural settlement confines which helps to ensure that encroachment into the countryside is avoided. Furthermore the policy specifically requires that development coming forward through this policy should not result in significant harm to important biodiversity networks.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	Policy specifically requires that development coming forward through this policy should not result in significant harm to surrounding landscape. In addition, it states specifically that where a proposal is located within or adjoining the AONB, it will also need to demonstrate that it is justifiable within the context of their national level of protection and does not significantly undermine their intrinsic or scenic beauty.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	++	This policy specifically requires that development coming forward through this policy should not result in significant harm to nearby heritage assets.
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy contributes to increasing the supply of housing in the Borough.
6 To ensure that all groups of the Borough's population have access to services and facilities so that opportunities for social inclusion are	/	No relationship

maximised.		
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	+	Development within the confines of existing rural settlements will reduce pressure for the development of high grade agricultural land and thus have a positive effect on this objective..
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	+	This policy supports the delivery of additional housing in existing settlements which will contribute to their vitality.

HOU5 RESIDENTIAL WINDFALL DEVELOPMENT IN THE COUNTRYSIDE	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	0	This policy supports the delivery of housing in the countryside. As such it could detract from the achievement of this objective. However the wording of the policy requires that development

		does not result in harm to the integrity of international and national protected sites in line with Policy ENV1. The impact is therefore concluded to be neutral.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	0	This policy supports the delivery of housing in the countryside. As such it could detract from the achievement of this objective. However the wording of the policy requires that development to respect the character of the landscape. the impact is therefore concluded to be neutral.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	+	This policy includes support for proposals which present the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets.
4 To help mitigate, and reduce the impact of, climate change and flooding.	-	This policy supports the delivery of housing in the countryside. As such it could detract from the achievement of this objective.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy contributes to increasing the supply of housing in the Borough.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable	--	This policy supports the delivery of additional housing in the open

management of waste.		countryside. This has a negative effect on the achievement of this objective and of protecting high grade agricultural land.
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	--	This policy supports the delivery of housing in the countryside. As such it significantly detracts from the achievement of this objective.

HOU6 SELF AND CUSTOM BUILT DEVELOPMENT	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy specifically requires that development proposals must be of high quality design and demonstrate a positive response to sustainable development.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship

8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

HOU7 REPLACEMENT DWELLINGS IN THE COUNTRYSIDE	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	This policy approach to replacement residential development outside the built confines will ensure that within or adjoining an AONB, proposals will be required to address the specific sensitivities that are prevalent in these areas.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	0	This policy allows for replacement dwellings to be erected on different footprints than the homes they are replacing. However, the policy has mitigation built in requiring that development coming forward under this policy will not harm the surrounding landscape and therefore the effect is considered to be neutral.
3 To conserve and enhance sites of	/	No relationship

cultural heritage and archaeological importance.		
4 To help mitigate, and reduce the impact of, climate change and flooding.	0	The proposed policy will have a neutral effect on the achievement of the objective.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	+	This policy contributes to improving the housing stock in the Borough.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

HOU8 RESIDENTIAL EXTENSIONS	APPRAISAL	COMMENTS
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SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	This policy supports this objective by specifically requiring that the proposed extensions are designed sensitively to avoid harm to the overall character or street scene of the surrounding area and the landscape and the distinct features of the landscape character area in which it is located.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	+	This policy contributes to improving the housing stock in the Borough.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	+	This policy contributes to improving the housing stock in the Borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
12 To facilitate sustainable economic growth and high quality employment opportunities in accessible locations	/	No relationship

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.	/	No relationship

HOU9 STANDALONE ANNEXES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	The policy requires that development coming forward under this policy will not have a harmful visual impact on the overall character of the surrounding area and/or the street scene or be visually intrusive in the landscape in which it is located.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy contributes to increasing the housing available for dependent relatives in the Borough, enabling family groups to live close to each other, reducing isolation.
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.	++	This policy contributes to increasing the housing available for dependent relatives in the Borough, enabling family groups to live close to each other, reducing isolation.
7 To improve the health and quality of life for those living and working in the Borough.	++	This policy contributes to increasing the housing available for dependent relatives in the Borough, enabling family groups to care for each other, reducing isolation.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe	/	No relationship

pedestrian and cycle routes.		
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

HOU10 DEVELOPMENT OF RESIDENTIAL GARDENS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	0	Gardens are important areas of biodiversity and so this policy could have a significantly negative impact on this objective. However, to mitigate this the policy requires that new development should not harm wildlife corridors and biodiversity habitats and so it is considered to have a neutral effect on this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	0	Gardens are important features in landscape and townscape character and so this policy could have a significantly negative impact on this objective. However, to prevent this the policy requires that new development should not harm the wider landscape and/or the countryside setting. and so it is considered to have a neutral effect on

		this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy contributes to increasing the housing stock in the Borough.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	+	This policy supports the development of previously developed land in the borough.
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

HOU11 HOUSES IN MULTIPLE OCCUPATION	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy contributes to increasing the range of housing in the Borough.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
12 To facilitate sustainable economic growth and high quality employment opportunities in accessible locations within the Borough and increase the skills	/	No relationship

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.	/	No relationship

HOU12 RESIDENTIAL SPACE STANDARDS (INTERNAL)	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy requires the delivery of national space standards as a minimum in new development in the borough, thereby enhancing the quality of new dwellings coming forward in the borough over the plan period.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	This policy requires the delivery of national space standards as a minimum in new development, thereby contributing to enhancing the quality of life for those living in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship

9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

HOU13 HOMES SUITABLE FOR FAMILY OCCUPATION	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy sets standards of accommodation for new dwellings designed for family occupation. This will improve housing stock for families in the borough.
6 To ensure that all groups of the Borough's population have access to	/	No relationship

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.	+	This policy will improve the accommodation in the Borough's housing stock going forward.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

HOU14 ACCESSIBILITY STANDARDS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological	/	No relationship

importance.		
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy requires that all new dwellings created as 'new build', should be built to comply with a minimum of 'level 2' access (building regulations part M4 (2)). Houses built to this standard are designed to meet the needs of occupiers throughout their lifetime and therefore this policy will significantly contribute to the achievement of this policy.
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.	+	All new dwellings created as 'new build', should be built to comply with a minimum of 'level 2' access (building regulations part M4 (2)). Houses built to this standard are designed to meet the needs of occupiers throughout their lifetime. This makes a positive contribution to this objective.
7 To improve the health and quality of life for those living and working in the Borough.	+	All new dwellings created as 'new build', should be built to comply with a minimum of 'level 2' access (building regulations part M4 (2)). Houses built to this standard are designed to meet the needs of occupiers throughout their lifetime and therefore this policy will contribute to the achievement of this policy..
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
12 To facilitate sustainable economic growth and high quality employment opportunities in accessible locations within the Borough and increase the skills	/	No relationship

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.	/	No relationship

HOU15 PRIVATE EXTERNAL SPACE STANDARDS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy establishes standards for private amenity areas for new residential development in the borough, contributing significantly to the achievement of this objective.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	This policy establishes standards for private amenity areas for new residential development in the borough, contributing significantly to the achievement of this objective.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship

9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

HOU16 TRAVELLER ACCOMMODATION	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	0	This policy supports the delivery of additional accommodation in the countryside. As such it could detract from the achievement of this objective. However the wording of the policy requires that development should not affect the visual or other essential qualities of an AONB, SSSI, Ancient woodland, international, national or local nature reserve or wildlife site, or the key characteristics of a Landscape Character Area. The impact is therefore concluded to be neutral.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	0	This policy supports the delivery of additional accommodation in the countryside. As such it could detract from the achievement of this objective. However the wording of the policy requires that development should not affect the visual or other essential qualities of an AONB, SSSI, Ancient woodland, international, national or local nature reserve or wildlife site, or the key characteristics of a Landscape Character Area. The impact is therefore concluded to be neutral.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy contributes to increasing the accommodation to meet the needs of gypsies and travellers and travelling showpeople in the Borough
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.	++	This policy contributes to increasing the accommodation available for gypsies, travellers and travelling showpeople, in the Borough.
7 To improve the health and quality of life for those living and working in the	++	This policy contributes to increasing the quality of life for gypsies, travellers and

Borough.		travelling showpeople in the Borough
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

HOU17 SAFEGUARDING EXISTING TRAVELLER SITES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	This policy of protecting existing sites will ensure that any unnecessary encroachment onto areas of biodiversity importance contributing to the achievement of this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	This policy of protecting existing sites will ensure that any unnecessary encroachment into the countryside is avoided.
3 To conserve and enhance sites of cultural heritage and archaeological	+	This policy of protecting existing sites will ensure that any potential additional development which may harm to sites of

importance.		cultural heritage and archaeological importance is avoided.
4 To help mitigate, and reduce the impact of, climate change and flooding.	+	This Policy of protecting existing sites will ensure that any potential additional development which may result in flooding is avoided.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	0	The proposed policy will have a neutral effect on the achievement of the objective.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	This policy protects existing accommodation for gypsies, travellers and travelling showpeople living in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	+	This policy of protecting existing sites supports the objective of steering development towards PDL.
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

5.4 Employment Policies

- 5.4.1 Employment policies set down the Local Plan’s approach to the commercial, retail and tourism development in the borough over the Plan period. There is a strongly sustainable approach to commercial development in this Section of the Plan with policies supporting new employment, retail and tourism uses being delivered within or adjoining existing settlements in the borough. Only conversions of buildings in the countryside for employment uses is deemed to have a negative effect on the SA objectives of sustaining the vitality of district centres and promoting sustainable economic growth in accessible locations.
- 5.4.2 Additional commercial development has the potential for harmful impacts on areas of biodiversity importance, natural and historic landscapes. In the case of topic policies where such an impact is possible, mitigation wording to prevent significant negative effects arising from development coming forward under that policy are usually incorporated within the wording of the proposed policy itself.

EMP1 NEW EMPLOYMENT USES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough’s areas of biodiversity importance.	++	This policy supports new employment premises within or adjoining settlement confines which helps to ensure that encroachment into the countryside is avoided. Mitigation is built into the policy by requiring that such development will not significantly damage the character and appearance of the surrounding landscape.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	This policy supports new employment premises within or adjoining settlement confines which helps to ensure that encroachment into the countryside is avoided. Mitigation is included in the policy through the requirement that such development will not significantly damage the character and appearance of the surrounding landscape.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to	/	No relationship

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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	+	In supporting development within the confines of existing settlements this policy has a positive impact on the objective to preventing the loss of high grade agricultural land.
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.	++	This policy promotes the delivery of new employment premises in or adjoining existing settlements in the borough.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	This policy promotes the delivery of new employment premises in or adjoining existing settlements in the borough.

EMP2 LOSS OR REDEVELOPMENT OF EMPLOYMENT SITES AND PREMISES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	+	This policy promotes the retention of existing sites and premises in the first instance. In this it supports the objective of maximising the re-use of PDL and buildings.
11 To ensure the prudent use of resources and the sustainable management of waste.	+	This policy will have a positive impact on the objective of preventing the loss of high grade agricultural land.
12 To facilitate sustainable economic growth and high quality employment	++	This policy promotes the retention of

opportunities in accessible locations within the Borough and increase the skills base of Ashford's residents.		existing employment premises
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	This policy promotes the retention of existing employment premises which contribute to the borough's economic performance and vitality or their replacement with similar premises in the same or adjoining settlement.

EMP3 EXTENSIONS TO EMPLOYMENT PREMISES IN THE RURAL AREA	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	This policy supports this objective by specifically requiring that extensions to existing rural employment premises should respect sites of biodiversity value.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	This policy supports this objective by specifically requiring that extensions to existing rural employment premises should be integrated sensitively into their context and respect the character of the landscape.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	++	This policy supports this objective by specifically requiring that extensions to existing rural employment premises should be integrated sensitively into their context and respect existing historic and architecturally important buildings.
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship

7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	++	This policy supports the extensions of existing employment premises.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	This policy supports extensions to existing employment premises which contribute to the borough's economic performance and vitality.

EMP4 CONVERSION OF RURAL BUILDINGS TO NON-RESIDENTIAL USES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	This policy supports this objective by specifically requiring that conversions should not significantly adversely impact on the biodiversity value of surrounding landscape.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	This policy supports this objective by specifically requiring that conversions should not significantly adversely impact on the character of the surrounding landscape.

3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	+	In promoting the reuse of existing rural buildings this policy supports this objective.
11 To ensure the prudent use of resources and the sustainable management of waste.	+	In promoting the reuse of existing rural buildings this policy removes the pressure for loss of high grade agricultural land to development, thereby supporting this objective.
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.	--	Conversions of buildings in the countryside remote from existing settlements to commercial uses will have a significantly negative impact on facilitating sustainable economic growth in accessible locations.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	--	Conversions of buildings in the countryside remote from existing settlements to commercial uses will have a significantly negative impact on existing centres.

EMP5 NEW EMPLOYMENT PREMISES IN THE COUNTRYSIDE	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	This policy supports this objective by specifically requiring that new employment premises should respect sites of biodiversity value.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	This policy supports this objective by specifically requiring that new employment premises should respect the character of the surrounding landscape.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	+	This policy supports this objective by specifically requiring that new employment premises should respect the character of important existing buildings.
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	-	The development new premises in the countryside could negatively impact on the objective of preventing the loss of high grade agricultural land.

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.	0	Support for new employment premises in open countryside runs counter to the achievement of this objective. However the policy makes clear that it should only apply to businesses where a countryside location is essential. The impact of this policy on this objective is therefore concluded to be neutral.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	0	New employment premises in open countryside away from settlements will have a significantly adverse impact on the achievement of this objective. However the policy makes clear that it should only apply to businesses where a countryside location is essential. The impact of this policy on this objective is therefore concluded to be neutral.

EMP6 PROMOTING FIBRE TO PREMISES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	++	Futureproofing the availability of superfast broadband across the borough has a significant positive effect on the achievement of this policy.
7 To improve the health and quality of life	++	Futureproofing the availability of

for those living and working in the Borough.		superfast broadband across the borough has a significant positive effect on the achievement of this policy.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	++	Futureproofing the availability of superfast broadband across the borough has a significant positive effect on the achievement of this policy.
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	++	Futureproofing the availability of superfast broadband across the borough has a significant positive effect on the achievement of this policy.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	Futureproofing the availability of superfast broadband across the borough has a significant positive effect on the achievement of this policy.

EMP7 PRIMARY AND SECONDARY SHOPPING FRONTAGES IN ASHFORD TOWN CENTRE	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	Retail outlets are an important element of the townscape character of Ashford and this policy therefore will have a positive impact on the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	+	A strong retail offer in the town centre, with its excellent public transport linkages will have a positive effect on the achievement of this objective.
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
12 To facilitate sustainable economic growth and high quality employment	++	This policy will have a significantly positive impact on the economic growth

opportunities in accessible locations within the Borough and increase the skills base of Ashford's residents.		of Ashford town centre.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	This policy will have a significantly positive impact on the economic growth of Ashford town centre.

EMP8 PRIMARY SHOPPING FRONTAGES IN TENTERDEN	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	The proposed policy does not have any effect on the achievement of the objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	Retail outlets are an important element of the townscape character of Tenterden and this policy therefore will have a positive impact on the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	+	A strong retail offer in Tenterden town centre, with its excellent public transport linkages will have a positive effect on the achievement of this objective.
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe	/	No relationship

pedestrian and cycle routes.		
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	++	This policy will have a significantly positive impact on the economic growth of Tenterden town centre.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	This policy will have a significantly positive impact on the economy of Tenterden town centre.

EMP9 SEQUENTIAL TESTS AND IMPACT ASSESSMENTS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
6 To ensure that all groups of the Borough's population have access to	++	This policy requires town centre uses development to accessible and well

services and facilities so that opportunities for social inclusion are maximised.		connected to Ashford town centre by public transport, bicycle and on foot, maximising social inclusion.
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	++	The proposed policy will have a significantly positive effect on the achievement of this objective through its requirement that new development for town centre uses to be well connected by pedestrian and cycle routes.
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	++	Promotes development of main town centre uses within the primary shopping areas of Ashford and Tenterden.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	Promotes development of main town centre uses within the primary shopping areas of Ashford and Tenterden.

EMP10 LOCAL AND VILLAGE CENTRES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship

3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	++	Local and village centres play an important role in providing for local shopping needs. They also play an essential service for those with restricted mobility. Their protection therefore will have a significantly positive effect on the achievement of this objective.
7 To improve the health and quality of life for those living and working in the Borough.	++	Local and village centres play an important role in providing for local shopping needs. They also play an essential service for those with restricted mobility. Their protection therefore will have a significantly positive effect on the achievement of this objective.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	++	Local and village centres help reduce the need to travel. Their protection therefore will have a significantly positive effect on the achievement of this objective.
9 To ensure that development responds appropriately to current and future infrastructure requirements	++	Local and village centres play an important role in providing for local shopping needs. Their protection therefore will have a significantly positive effect on the achievement of this objective.
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	++	Local and village centres play an important role in providing for local shopping needs. Their protection therefore will have a significantly positive effect on the achievement of this objective.

13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	Local and village centres play an important role in providing for local shopping needs. Their protection therefore will have a significantly positive effect on the achievement of this objective.
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EMP11 TOURISM	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship

11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	++	This policy supports the provision of new hotel and B&B development in accessible locations, particularly in Ashford urban area.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	This policy supports the provision of new hotel and B&B development in accessible locations, particularly in Ashford urban area.

5.5 Transport Policies

5.5.1 Future development in the borough over the plan period will inevitably increase traffic movement on the road network. This Section of the Plan provides policies for strategic works to the highway network to ensure capacity and flow and to protect the minor routes and lanes of the borough from inappropriate traffic levels. These policies have a positive effect on the objective of facilitating economic growth in the borough. Policies setting out parking standards for the borough and additional car park provision at Ashford are also set out here. Given their promotion of vehicular travel, with consequent likely increase in emissions and potential deterioration in air quality, such policies are largely assessed as having negative effects on the SA objectives of protecting and enhancing areas of biodiversity importance and the natural and historic landscapes of the borough.

5.5.2 Such transport policies are balanced by active promotion of more sustainable forms of travel, with policies promoting cycling and pedestrian movement and the local bus network. Such policies therefore have a positive impact on health and wellbeing, sustainable travel objectives by working to reduce dependence of car travel.

TRA1 STRATEGIC TRANSPORT SCHEMES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	-	In seeking the implementation of major highway schemes, and a consequent increase in the attractiveness of vehicular travel by the removal of current problem areas in the existing network this policy does not accord with the objective of protecting and enhancing areas of biodiversity importance, which are vulnerable to changes in air quality for example. However, the policy has the potential to secure environmental improvements and it is therefore concluded that it will have not have a significantly negative effect on the achievement of this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	-	In seeking the implementation of major highway schemes, and a consequent increase in the attractiveness of vehicular travel by the removal of current problem areas in the existing network this policy does not accord with the objective of enhancing the landscape character of the borough. However, the policy has the potential to secure environmental improvements and it is therefore concluded that it will have not have a significantly negative effect on the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	-	In seeking the implementation of major highway schemes, and a consequent increase in the attractiveness of vehicular travel by the removal of current problem areas in the existing network this policy does not accord with the objective of conserving and enhancing heritage assets. However, the policy has the potential to secure environmental improvements and it is therefore concluded that it will have not have a significantly negative effect on the achievement of this objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	-	This policy will have a negative effect on the achievement of the objective.

5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	0	This Policy seeks the implementation of highway and other strategic schemes that will remove serious impediments to growth and which will secure economic benefits for the borough. However it intrinsically will enable increased vehicular movements which have potential increased vehicular emission levels across the borough harmful to the health of residents. It is therefore considered as having a neutral impact on this objective.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	-	The proposed policy will have a negative effect on the achievement of this objective.
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	++	This Policy seeks the implementation of highway and other strategic schemes that will facilitate sustainable economic growth.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	this Policy seeks the implementation of highway and other strategic schemes that will remove serious impediments to growth and which will secure economic benefits for the borough enhancing economic performance and vitality.

TRA2 STRATEGIC PUBLIC PARKING FACILITIES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	+	The provision of additional parking facilities in Ashford town centre will improve accessibility to the retail and leisure offer of the town.
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	-	This policy will have a negative impact on this objective by its encouragement of the use of private cars.
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship

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.	++	The provision of additional parking facilities in Ashford town centre will improve the economic performance of the town and contribute to this objective
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	++	The provision of additional parking facilities in Ashford town centre will improve the economic performance of the town and contribute significantly to this objective.

TRA3a PARKING STANDARDS FOR RESIDENTIAL DEVELOPMENT	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	the provision of adequate parking facilities in new residential development is frequently cited as an important quality of life issue for residents.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe	-	The proposed policy will have a negative effect on the achievement of this objective.

pedestrian and cycle routes.		
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

TRA3b PARKING STANDARDS FOR NON-RESIDENTIAL DEVELOPMENT	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
6 To ensure that all groups of the Borough's population have access to	/	No relationship

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.	++	Ensuring the provision of adequate parking facilities in new commercial development improves the quality of life for those working in the borough and addresses the problem of overspill parking which can have a harmful effect on the quality of life in adjoining residential areas.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	-	The proposed policy will have a negative effect on the achievement of this objective.
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	+	The provision of adequate parking facilities is an attractive element for employees of places of employment and so this policy will have a positive effect on the achievement of this objective.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

TRA4 PROMOTING THE LOCAL BUS NETWORK	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	The promotion of public transport contributes to this objective by working to reduce dependence of car travel.

2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	The promotion of public transport contributes to this objective by working to reduce dependence of car travel.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	+	The promotion of public transport contributes to this objective by working to reduce dependence of car travel.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	++	The promotion of public transport promotes social inclusion by increasing opportunities for travel for all groups of the population of the borough.
7 To improve the health and quality of life for those living and working in the Borough.	++	The promotion of public transport improves the quality of life for those without access to or ability to use private vehicles.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	++	this policy contributes to seeking a modal shift between dependency on the private car and more sustainable forms of transport.
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within	++	Increasing the accessibility of the settlements of the borough by public transport will have a positive effect on

the Borough's retail hierarchy.		this objective.
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TRA5 PLANNING FOR PEDESTRIANS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	In promoting a modal shift towards sustainable transport this policy will have a positive effect on this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	In promoting a modal shift towards sustainable transport this policy will have a positive effect on this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	+	In promoting a modal shift towards sustainable transport this policy will have a positive effect on this objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	+	This policy helps the achievement of this objective by increasing the availability of safe and accessible pedestrian routes in the borough and working to reduce the need to travel by car.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	0	The proposed policy will have a neutral effect on the achievement of the objective.
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.	+	This policy helps the achievement of this objective by increasing the availability of safe and accessible pedestrian routes in the borough.
7 To improve the health and quality of life for those living and working in the Borough.	++	This policy promotes health by enhancing the availability of safe and accessible pedestrian routes in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	++	This policy requires that all developments should deliver safe and accessible pedestrian routes well connected to the wider movement network.
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and	/	No relationship

geological assets.		
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

TRA6 PROVISION FOR CYCLING	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	In promoting a modal shift towards sustainable transport this policy will have a positive effect on this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	In promoting a modal shift towards sustainable transport this policy will have a positive effect on this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	+	In promoting a modal shift towards sustainable transport this policy will have a positive effect on this objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	+	This policy helps the achievement of this objective by increasing the availability of safe and accessible cycle routes in the borough and working to reduce the need to travel by car.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	0	The proposed policy will have a neutral effect on the achievement of this objective.
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.	++	This policy helps the achievement of this objective by increasing the availability of safe and accessible cycle routes in the borough.

7 To improve the health and quality of life for those living and working in the Borough.	++	This policy promotes health by enhancing the availability of safe and accessible cycle routes in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	++	This policy requires that all developments should deliver safe and accessible cycle routes well connected to the wider movement network.
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

TRA7 THE ROAD NETWORK AND DEVELOPMENT	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	This policy protects rural roads and non-primary and secondary routes which are important elements of the landscape character of the borough from inappropriate levels of traffic generation or unsuitable traffic movements.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship

4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	+	This policy protects non-primary and secondary routes from inappropriate levels of traffic generation or unsuitable traffic movements.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	+	This policy requires development that will generate significant traffic movements to be located on the major (primary and secondary) networks. These link the main settlements in the borough and so this policy indirectly contributes to sustaining their economic vitality.

TRA8 TRAVEL PLANS,	APPRAISAL	COMMENTS
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ASSESSMENTS AND STATEMENTS		
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	In seeking to mitigate any negative impacts of additional traffic movements arising from development, the policy contributes to the achievement of this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	In seeking to mitigate any negative impacts of additional traffic movements arising from development, the policy contributes to the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	+	In seeking to mitigate any negative impacts of additional traffic movements arising from development, the policy contributes to the achievement of this objective.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	+	This policy promotes the assessment and mitigation any negative transport impacts of development in order to ensure the delivery of sustainable development in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	++	In seeking to mitigate any negative impacts of additional traffic movements arising from development, the policy encourages modal shift and therefore contributes to the achievement of this objective.
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient	/	No relationship

and appropriate use of land, soils and geological assets.		
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

TRA9 PLANNING FOR HGV MOVEMENTS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	-	The proposed policy will have a negative effect on the achievement of the objective
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	-	The proposed policy will have a negative effect on the achievement of the objective
3 To conserve and enhance sites of cultural heritage and archaeological importance.	-	The proposed policy will have a negative effect on the achievement of the objective
4 To help mitigate, and reduce the impact of, climate change and flooding.	-	The proposed policy will have a negative effect on the achievement of the objective
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship

7 To improve the health and quality of life for those living and working in the Borough.	-	Additional HGV movements would have a potentially negative impact on air quality through increased emissions which in turn can have a negative impact on this objective.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	-	The proposed policy will have a negative effect on the achievement of this objective
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	++	Given the strategic location of Ashford Borough this policy provides planning guidance for developments which are likely to generate significant HGV movements in line with the objective of sustainable economic growth.
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	+	The proposed policy will have a positive effect on the achievement of this objective

5.6 Natural and Built Environment Policies

- 5.6.1 The Policies of this Section broadly seek to protect, conserve and enhance the European and nationally protected landscapes and sites of biodiversity importance of the borough as well as its historic environments and heritage assets. In addition, this Section sets down policies which will contribute to mitigating and adapting to climate change, including through dealing with flood risk and water resources, requiring new development to incorporate sustainable design and mitigation measures, and promoting the use and development of renewable energy.
- 5.6.2 Given the sustainable subject matter of these policies it is unsurprisingly that they score highly in the appraisal against the Sustainability Objectives with a largely positive effect across all objectives.

ENV1 BIODIVERSITY	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	This policy requires the protection and enhancement of the boroughs areas of biodiversity importance significantly contributing to this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	This policy seeks the protection and enhancement of the boroughs landscapes thus contributing significantly to this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	0	The proposed policy has a neutral effect on the achievement of the objective
4 To help mitigate, and reduce the impact of, climate change and flooding.	+	By protecting and enhancing the natural environment of the borough this policy will contribute to the achievement of this objective.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	In working to protect the landscapes and areas of biodiversity in the borough this policy contributes to improving the health and quality of life of those who live and work in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship

11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

ENV2 THE ASHFORD GREEN CORRIDOR	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	The protection and enhancement of the Ashford Green Corridors will promote biodiversity and the protection of nature conservation interests.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	The protection of the green corridors will enhance the quality of the landscape in the Ashford Urban Area
3 To conserve and enhance sites of cultural heritage and archaeological importance.	0	The proposed policy has a neutral effect on the achievement of the objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	++	The Ashford green corridor lies within the flood plain and provides important water storage areas. Its protection and enhancement therefore contributes significantly to this objective.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship

7 To improve the health and quality of life for those living and working in the Borough.	++	The green corridors promote health and wellbeing, provide opportunities for active sports and gentle recreation. These include a network of footpaths and cycleways which serve as recreational and sustainable transport opportunities. Their protection and enhancement contributes significantly to this objective.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	++	The green corridors provide an excellent network of footpaths and cycleways which serve as recreational and sustainable transport opportunities, including linkages to the town centre and to the stations. This policy therefore encourages a modal shift in travel patterns and enhances connectivity between Ashford and the surrounding countryside and rural settlements.
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

ENV3 LANDSCAPE CHARACTER AND DESIGN	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	This policy contributes significantly to this objective. It gives the AONBs the highest level of protection for landscape and scenic beauty and requires all

		development to have regard to landscape character and design.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	This policy contributes significantly to this objective. It gives the AONBs the highest level of protection for landscape and scenic beauty and requires all development to have regard to landscape character and design.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	++	This policy requires all development to have regard to the presence and pattern of historic features.
4 To help mitigate, and reduce the impact of, climate change and flooding.	+	This policy requires all development to demonstrate regard to natural patterns of drainage.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	In working to protect the landscapes and areas of biodiversity in the borough this policy contributes to improving the health and quality of those who live and work in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
12 To facilitate sustainable economic growth and high quality employment opportunities in accessible locations	/	No relationship

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.	/	No relationship

ENV4 LIGHT POLLUTION AND PROMOTING DARK SKIES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	This policy supports the protection of the landscapes of the borough from light pollution and so this policy contributes significantly to the achievement of this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	By seeking to protect the dark skies landscapes in the borough from the effects of light pollution this policy contributes significantly to the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	0	The proposed policy will have a neutral effect on the achievement of the objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	+	In promoting the protection of the borough from light pollution this policy contributes to improving the health of and quality of life those who live and work in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe	/	No relationship

pedestrian and cycle routes.		
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

ENV5 PROTECTING IMPORTANT RURAL FEATURES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	This policy requires all development to protect and enhance important features of the rural landscape thereby contributing significantly to this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	This policy requires all development to protect and enhance significant landscape features thereby contributing significantly to this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	+	this policy requires development to have regard to rural routes of historic importance which are important elements of the heritage of the borough.
4 To help mitigate, and reduce the impact of, climate change and flooding.	+	This policy requires all development to protect and enhance river corridors and tributaries.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to	/	No relationship

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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	In working to protect the rural landscapes of the borough this policy contributes to improving the health and quality of life of those who live and work in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship.

ENV6 FLOOD RISK	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	This policy requires new development to contribute to flood risk reduction. Flooding can harm areas of biodiversity importance and therefore this policy has a positive impact on the achievement of this

		objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	This policy requires new development to contribute to flood risk reduction. Flooding can harm the character of the landscape of the borough and therefore this policy has a positive impact on the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	+	This policy requires new development to contribute to flood risk reduction. Flooding can harm the sites of cultural heritage and archaeological important and therefore this policy will have a positive impact on the achievement of this objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	++	This policy requires new development to contribute to flood risk reduction.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	+	In working to protect the borough from flooding this policy contributes to improving the health and quality of those who live and work in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
12 To facilitate sustainable economic growth and high quality employment opportunities in accessible locations	/	No relationship

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.	/	No relationship

ENV7 WATER EFFICIENCY	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	++	This policy requires that all new residential development achieve as a minimum the optional building regulations on water efficiency. This will contribute to reducing the impact of climate change and instances of flooding in the borough.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	++	This policy requires that all new residential development achieve as a minimum the optional building regulations on water efficiency. This will increase the numbers of good quality sustainable dwellings in the borough
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	This policy requires that all new residential development achieve as a minimum the optional building regulations on water efficiency. This will contribute to reducing the instances of flooding in the borough
8 To encourage modal shift and enhance connectivity between communities and	/	No relationship

town/ district centres through safe pedestrian and cycle routes.		
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

ENV8 WATER QUALITY, SUPPLY AND TREATMENT	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	The quality of water has a direct impact on areas of biodiversity importance in the borough. This policy therefore significantly contributes to this objective by requiring that there are no direct or indirect adverse effects on the quality of water supplies from new development.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	The quality of water has a direct impact on the landscapes of the borough. This policy therefore significantly contributes to this objective by requiring that there are no direct or indirect adverse effects on the quality of water supplies from new development.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship.

4 To help mitigate, and reduce the impact of, climate change and flooding.	+	This policy contributes to this objective by requiring that there are no direct or indirect adverse effects on the quality of water supplies from new development on groundwater protection zones.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	This policy significantly contributes to this objective by requiring that there are no direct or indirect adverse effects on the quality of water supplies from new development
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship.

ENV9 SUSTAINABLE DRAINAGE	APPRAISAL	COMMENTS
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SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	This policy contributes to this objective by requiring all new development coming forward in the borough to include appropriate SuDS for the disposal of surface water. The installation of SuDS avoids an increase in flooding or adverse impact on water quality, both of which could be harmful to areas of biodiversity importance.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	This policy contributes to this objective by requiring all new development coming forward in the borough to include appropriate SuDS for the disposal of surface water to avoid an increase in flooding or adverse impact on water quality, both of which could be harmful to the landscape character of the borough.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	0	The proposed policy would have a neutral effect on the achievement of the objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	++	This policy contributes to this objective by requiring all new development coming forward in the borough to include appropriate SuDS for the disposal of surface water to avoid an increase in flooding.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	+	This policy contributes to this objective by requiring all new development coming forward in the borough to include appropriate SuDS for the disposal of surface water, thereby increasing the numbers of high quality sustainably designed homes in the borough.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe	/	No relationship

pedestrian and cycle routes.		
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

ENV10 RENEWABLE AND LOW CARBON ENERGY	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	This policy specifically requires that development should not result in significant adverse impacts on the landscape, thus making a positive contribution to the delivery of this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	This policy specifically requires that development should not result in significant adverse impacts on the landscape, thus making a positive contribution to the delivery of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	+	This policy specifically requires that development should not result in significant adverse impacts on historic assets, thus positively contributing to this objective.

4 To help mitigate, and reduce the impact of, climate change and flooding.	++	The promotion of proposals which generate energy from renewable and low carbon sources in the borough contributes significantly to this objective.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	+	The promotion of proposals which generate energy from renewable and low carbon sources in the borough will enhance the sustainability of new development in the borough.
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

ENV11 SUSTAINABLE DESIGN AND	APPRAISAL	COMMENTS
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CONSTRUCTION NON-RESIDENTIAL		
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	Water resources are an important issue for the areas of biodiversity importance of this borough. Achieving reductions in water consumption will have a positive effect on the achievement of the objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	Water resources are important in shaping the landscape of this borough. Achieving reductions in water consumption will have a positive effect on the achievement of the objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	++	This policy significantly contributes to the Plan's positive strategy to mitigate and adapt to climate change.
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship

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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

ENV12 AIR QUALITY	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	++	The protection and improvement in the air quality of the borough will contribute significantly to this objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	The protection and improvement in the air quality of the borough will contribute significantly to this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	++	The protection and improvement in the air quality of the borough will deliver direct benefits to the health of 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.	+	Policy ENV12 requires development to be located where it enables an increase in levels of walking and cycling, thereby contributing to this objective.

9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

ENV13 CONSERVATION AND ENHANCEMENT OF HERITAGE ASSETS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	Heritage assets often form important elements of townscape and landscape character and so their conservation and enhancement contributes to the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	++	This policy contributes significantly to the achievement of this objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
6 To ensure that all groups of the Borough's population have access to	/	No relationship

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.	+	In working to protect the historic features of the borough which help to shape much of its character and sense of place this policy contributes to improving the health and quality of life of those who live and work in the borough
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	+	This policy promotes the viable re-use of heritage assets. In so doing it enables a positive future for currently derelict or unused buildings in the borough in line with this objective.
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

ENV14 CONSERVATION AREAS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	++	Its many conservation areas contribute considerably to the townscape character of the borough and so their conservation and enhancement contributes to a significant

		extent to the achievement of this objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	++	This policy contributes significantly to the achievement of this objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	+	In working to protect the attractive conservation areas of the borough this policy contributes to improving the health and quality of life of those who live and work in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

ENV15 ARCHAEOLOGY	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	0	The proposed policy will have a neutral effect on the achievement of the objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	Archaeological remains can contribute considerably to townscape and landscape character. This policy provides the approach for ensuring that archaeology, known or unknown at the time of development, responds appropriately to the landscape in which it is located.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	++	The protection and enhancement of archaeological sites afforded by this policy contributes significantly to the achievement of this objective.
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	-	The discovery of new archaeological remains which require excavation could have a minor negative impact on high grade agricultural land or geologically important areas. Mitigation measures are

		included in the policy to ensure appropriate resolutions and the presumption of the remains being preserved in situ as first resort.
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

5.7 Community Facilities Policies

5.7.1 The provision of good quality community infrastructure and services designed around people and their cultural, leisure, health, learning, social and wellbeing needs are fundamental to the creation of sustainable communities. This Chapter provides the policy framework for the delivery of facilities including those that provide social and community leisure space, recreation and sports, public open spaces, children's play, educational and learning such as schools and libraries and health services.

5.7.2 Given the importance of such facilities to the achievement of sustainable communities these policies are assessed as having a largely positive effect on the 13 SA objectives. In particular the Section has a cumulatively significantly positive impact on health and wellbeing and access to services and social inclusion.

COM1 MEETING THE COMMUNITY'S NEEDS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship

3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	++	This policy requires the delivery of new social and community facilities and infrastructure by all new development coming forward across the borough. It therefore will have a significant positive effect on this objective by working to ensure all groups have access to services and facilities.
7 To improve the health and quality of life for those living and working in the Borough.	++	In requiring the delivery of new social and community facilities and infrastructure by all new development coming forward this policy supports the objective of improving the quality of life and health of 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.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	++	This policy requires the delivery of new social and community facilities and infrastructure by all new development coming forward across the borough. It therefore contributes significantly to the achievement of this objective
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and	/	No relationship

district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.		
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COM2 RECREATION, SPORT, PLAY AND OPEN SPACES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	By requiring the delivery of increased provision of areas of natural green spaces and areas for sport, play and recreation in the borough this policy contributes to reducing the pressure on areas of existing open space and biodiversity importance from recreational pressures arising from new development.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	By requiring the delivery of increased provision of areas of natural green spaces and areas for sport, play and recreation in the borough this policy contributes to reducing the pressure on the countryside from recreational demand.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	++	The delivery of increased provision of areas of natural green spaces and areas for sport, play and recreation in the borough has a significant effect on the objective of ensuring all groups in the borough have improved access to open space, recreation and play facilities.
7 To improve the health and quality of life for those living and working in the Borough.	++	The delivery of increased provision of areas of natural green spaces and areas for sport, play and recreation in the borough this policy will improve the health

		and quality of life of 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.	+	This policy specifically requires new areas of open space to be accessible by green routes.
9 To ensure that development responds appropriately to current and future infrastructure requirements	++	The delivery of increased provision of areas of natural green spaces and areas for sport, play and recreation is an important part of the infrastructural elements of sustainable development.
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

COM3 ALLOTMENTS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	Allotments contribute to enhancing biodiversity in built up areas and therefore this policy has a positive effect on the achievement of the objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	0	The proposed policy has a neutral effect on the achievement of the objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship

4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	+	This policy increases the provision of allotments in the borough, widening the opportunities for residents.
7 To improve the health and quality of life for those living and working in the Borough.	++	Allotments provide exercise and open air recreation, both of which contribute to improved health and quality of life. Therefore this policy makes a significant contribution to the achievement of this objective.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

COM4 CEMETERY PROVISION	APPRAISAL	COMMENTS
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SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	0	The proposed policy has a neutral effect on the achievement of the objective.
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	0	The proposed policy has a neutral effect on the achievement of the objective.
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	/	No relationship
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	++	This policy provides policy support for the delivery of additional cemetery provision in the borough, and therefore contributes to the objective of responding to future infrastructure requirements.
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
12 To facilitate sustainable economic growth and high quality employment opportunities in accessible locations within the Borough and increase the skills	/	No relationship

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.	/	No relationship

5.8 Implementation Policies

5.8.1 The Council has a long and successful track record in successfully managing the funding of new infrastructure in the borough. Alongside the Council's Infrastructure Delivery Plan which sets out the infrastructure that is required to be delivered to support the planned development of the Local Plan 2030, these four policies are focused on ensuring the delivery of the social, community, landscaping and highways infrastructure set out in this Plan and as a result the sustainable growth of the borough.

5.8.2 The policies of this Section set out the requirements that will be asked of development coming forward with regard to infrastructure delivery, funding, governance and maintenance as well as the Council's commitment to enforcement in tackling unauthorised development. They have individually and collectively a significantly positive effect on the achievement of the infrastructure delivery objective and positive impacts on objectives of improved access to services, social inclusion and well being.

IMP1 INFRASTRUCTURE PROVISION	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship

4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	++	This policy has a significantly positive effect on this objective by requiring all development to contribute to additional infrastructure requirements coming forward during the plan period.
7 To improve the health and quality of life for those living and working in the Borough.	++	This policy contributes significantly to the achievement of this objective by requiring all development to contribute to additional infrastructure requirements coming forward during the plan period.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	++	This policy requires that all developers work with relevant service providers to identify and deliver the infrastructure that is needed to support the development set out in this Plan and that all developments shall make provision to meet the additional requirements for infrastructure arising from the development, either through Section 106 Agreements and / or Community Infrastructure Levy contributions. It therefore has a significant positive effect on this objective.
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

IMP2 DEFERRED CONTRIBUTIONS	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
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.	++	This policy supports the delivery of all the infrastructure requirements of the Plan thereby contributing to the objective of all those living and working in the borough have access to services and facilities.
7 To improve the health and quality of life for those living and working in the Borough.	++	Supports the delivery of all the infrastructure requirements of the Plan to support the needs generated by development thereby contributing to the objective of improving the quality of life of 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.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	++	Requires the delivery of all the infrastructure requirements of the Plan to support the needs generated by development significantly contributing significantly to the achievement of this objective.
10 To protect and make the most efficient and appropriate use of land, soils and	/	No relationship

geological assets.		
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

IMP3 PLANNING ENFORCEMENT	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	+	An active commitment to planning enforcement helps meet this objective
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	+	An active commitment to planning enforcement helps meet this objective
3 To conserve and enhance sites of cultural heritage and archaeological importance.	+	An active commitment to planning enforcement helps meet this objective
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	+	An active commitment to planning enforcement helps meet this objective
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.	/	No relationship
7 To improve the health and quality of life for those living and working in the Borough.	+	An active commitment to planning enforcement helps meet this objective
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe	/	No relationship

pedestrian and cycle routes.		
9 To ensure that development responds appropriately to current and future infrastructure requirements	/	No relationship
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

IMP4 GOVERNANCE OF PUBLIC COMMUNITY SPACE AND FACILITIES	APPRAISAL	COMMENTS
SA Objective		
1 To protect and enhance the Borough's areas of biodiversity importance.	/	No relationship
2 To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	/	No relationship
3 To conserve and enhance sites of cultural heritage and archaeological importance.	/	No relationship
4 To help mitigate, and reduce the impact of, climate change and flooding.	/	No relationship
5 To ensure the delivery of a mix of good quality, sustainably constructed homes to meet identified needs.	/	No relationship
6 To ensure that all groups of the Borough's population have access to	/	No relationship

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.	+	The requirement to have a governance strategy for all substantial new community spaces and facilities as set out in this policy contributes to ensuring the delivery of quality well managed new facilities which play an important role in the quality of life of residents in the borough.
8 To encourage modal shift and enhance connectivity between communities and town/ district centres through safe pedestrian and cycle routes.	/	No relationship
9 To ensure that development responds appropriately to current and future infrastructure requirements	++	The requirement for governance strategies for all new substantial community spaces and facilities contributes significantly to the achievement of this objective.
10 To protect and make the most efficient and appropriate use of land, soils and geological assets.	/	No relationship
11 To ensure the prudent use of resources and the sustainable management of waste.	/	No relationship
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.	/	No relationship
13 To improve and sustain the town and district centres' economic performance and vitality and maintain their roles within the Borough's retail hierarchy.	/	No relationship

6. MITIGATION AND MONITORING

6.1 Mitigation measures

- 6.1.1 The purpose of this section is to identify measures that will help mitigate the potential adverse effects of policies contained within the Ashford Borough Local Plan 2030 and amplify the predicted positive effects. Many mitigation measures have been included within the policies in the Plan itself, or addressed by the Plan as a whole.
- 6.1.2 In addition mitigation measures that are proposed to help reduce the potential for negative impacts, and improve predicted positive effects are summarised below:
- Provision of new infrastructure, including the delivery of strategic transport schemes.
 - Ensure through the planning process that all development coming forward is of high quality and appropriately designed to respond to existing built form and respect its landscape setting and that measures are taken to reduce any visual impact from development, such as appropriate screening and landscaping.
 - Deliver a wide range of additional social and community facilities and require that governance systems are agreed in place from the outset.
 - Affordable housing provision should be well integrated to ensure that social inclusion is promoted and maintained.
 - Promote development which protects and enhances areas of biodiversity importance, including the Ashford Green Corridor.
 - Eight sport and recreational hubs will be delivered which provide a variety of leisure facilities that will benefit the whole Borough.
 - Provide green spaces in new residential development either on-site or off-site.
 - Establish the conditions, through the allocation of sites and the application of other topic policies that will enable the provision of new employment opportunities and retention of existing employment locations.
 - Regularly monitor the policies of the Local Plan to ensure they are meeting their objectives.

6.2 Monitoring

- 6.2.1 It is a requirement of the SEA Directive to establish how the significant sustainability effects of implementing the Plan will be monitored. Appendix 1 of the SA Scoping Report (Appendix 1 – Annex 1 of this Report) sets out current or suggested indicators for each of the of the SA Objectives.

- 6.2.2 The Borough Council's Annual Monitoring Report sets out the overall performance of planning policies set out in the various DPDs that have been prepared previously. The Monitoring Report will also provide up-to-date information on the implementation of any neighbourhood plans that have been made, and will be used to determine whether there is a need to undertake a partial or full review of the Local Plan.
- 6.2.3 The Council's present position is that there needs to be a consolidation of the various indicators that have been previously used into a set that can be easily interpreted and reflect the current Sustainability Appraisal Objectives. Such indicators will be included within the submission version of the Plan. The Council's framework for monitoring of this plan will be based on the following:
- To check the effectiveness of policy and whether it is delivering sustainable development;
 - To check the timely delivery of key infrastructure
 - To assess the extent to which policies are being implemented and whether development targets are being met;
 - Where policies are not being implemented then explain why
 - To identify policies that need early review if necessary
- 6.2.4 When such indicators are finalised in the submission version of the Plan those that relate to the SA Objectives will included in this report.

APPENDICES

Appendix 1 – Scoping Report

Appendix 2 – Minor changes to Local Plan vision following initial assessment

Appendix 3 – Reasonable Alternative Sites and Assessments

Appendix 4 – Additional site assessments