

Ashford Borough Council

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

ADDENDUM

ABC/PS/21 (and part of SD02)

SEPTEMBER 2018



1. NON-TECHNICAL SUMMARY

1.1 Introduction

1.1.1 This report provides an Addendum to the Sustainability Appraisal (SA) Environmental Reports of:

- May 2016 published and consulted upon (under Regulation 13 of the 2004 Regulations¹) alongside the Regulation 19 Version Ashford Local Plan 2030. Consultation took place over an eight week period during June and August 2016.
- July 2017 Addendum published and consulted upon (under Regulation 13 of the 2004 Regulations¹) alongside the 'Main Changes' Version Ashford Local Plan 2030. Consultation took place for a further eight week period during July and August 2017.
- November 2017 Addendum published alongside Submission Version of the Local Plan 2030 (December 2017)

1.1.2 This Addendum considers the Main Modifications to the Submission Version of the Local Plan 2030 following changes which have been proposed through the Local Plan examination hearing sessions and as recommended in the Inspectors' post-hearing advice, and provides an update to the SA assessments where this is considered necessary.

1.1.3 This report should therefore be read in conjunction with the original SA Report May 2016 and Addendums July 2017 and November 2017.

1.1.4 This SA Addendum Report is subject to a period of public consultation alongside the Main Modifications to the Local Plan 2030 between 13th September 2018 and 26th October 2018. Comments and representations can be submitted using the comments form provided at the end of this document, or available to download from the consultation portal at https://haveyoursay.ashford.gov.uk/consult.ti/MainMods_LocalPlan/consultationHome

Comments 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 and must be received by **5pm on Friday 26th October 2018**.

1.2 National Policy and Guidance

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

1.2.1 The National Planning Practice Guidance (NPPG) provides guidance on whether the SA report should be amended if modifications to the Local Plan are proposed at examination.

1.2.2 The NPPG provides the following relevant guidance in this respect:

- It is up to the local planning authority to decide if the SA report should be amended following changes to an emerging plan.
- If the necessary changes are significant, and were not subject previously to SA, then further SA may be required and the SA report should be updated and amended accordingly.

1.3 Summary of changes (main modifications) proposed to Submission Draft Ashford Local Plan 2030 and requiring SA re-assessment

Introduction

1.3.1 The following tables identify and summarise where changes are proposed to the Plan in the Main Modifications, the significance of the change and whether the change has been previously assessed in the SA.

Strategic Policies

Issue/ Policy	Summary of proposed change	Significance	Previously assessed	Conclusion
Vision	No changes	n/a	n/a	No update required
Strategic Objectives	No changes	n/a	n/a	No update required
Housing Delivery – amount (Policy SP2)	Overall housing requirement increase from 16,120 to 16,872 (2011-2030) Net housing requirement (2018-2030) of 13,118	Potentially significant	No	Additional alternative to be assessed
Housing Delivery – spatial strategy (Policy SP2)	Decrease in housing provision at Ashford to	Not significant	Yes – alternative 4.2	No update required – overall strategic distribution remains broadly the same and already assessed

	10,141 ² and rural/villages to 1412 ³ Change in proportionate split of Ashford: Rest of Borough 83:17 to 88:12			
	Distribution of housing around Ashford – deletion of additional allocations to south and north-west of town	Potentially significant	Yes alternative 5.3	No update required – change reverts back to original alternative 5.3 and already assessed
Economic Development (Policy SP3)	Minor changes to wording	Not significant	Yes – alternative 1.2	No update required
Retail and Leisure Needs (SP4)	Minor changes to wording	Not significant	Yes	No update required
Ashford Town Centre (SP5)	Minor changes to wording	Not significant	Yes	No update required
Promoting High Quality Design (SP6)	No change	n/a	n/a	No update required
Separation of Settlements (SP7)	No change	n/a	n/a	No update required

Table 1 summary of proposed changes to the strategic policies of the Local Plan

- 1.3.2 Table 1 identifies two areas where the proposed changes to the Strategic Policies of the Plan may have a potentially significant effect. The proposed increase in the housing target has not been assessed in the current SA and a new assessment is therefore completed and revised conclusions provided in Section 3 of this Addendum.
- 1.3.3 The proposed changes to the distribution of housing at Ashford, has reverted back to the proposals in the Regulation 19 version and have therefore already been assessed under Alternative 5.3 set out in the Environmental Report May 2016, there is therefore no need to reassess the proposals, however a further explanation of this is provided in Section 3.

² Source: Main Modifications Housing Trajectory (calculated excluding windfalls)

³ Source: Main Modifications Housing Trajectory (calculated excluding windfalls and Neighbourhood Plan provision)

Site Allocations

1.3.4 Table 2 summarises changes that are proposed to site policies. Whilst the housing target has increased, a reduction in contingency buffer means that no additional site allocations are required in order to meet the overall housing target or to provide a five year housing land supply.

Issue/Policy	Summary of proposed change	Significance	Previously assessed	Conclusion
S1	No change	n/a	n/a	No update required
S2	Minor changes to policy wording	Not significant	Yes	No update required
S3	Minor changes to policy wording	Not significant	Yes	No update required
S4	Minor changes to policy wording	Not significant	Yes	No update required
S5	Minor changes to policy wording	Not significant	Yes	No update required
S6	Minor changes to policy wording	Not significant	Yes	No update required
S7	Minor changes to policy wording	Not significant	Yes	No update required
S8	Minor changes to policy wording	Not significant	Yes	No update required
S9	Minor changes to policy wording	Not significant	Yes	No update required
S10	Minor changes to policy wording	Not significant	Yes	No update required
S11	Minor changes to policy wording	Not significant	Yes	No update required
S11a	Minor changes to policy wording	Not significant	Yes	No update required
S12	No change	n/a	n/a	No update required
S13	Minor changes to policy wording	Not significant	Yes	No update required
S14	No change to policy	Not significant	Yes	No update required
S15	Minor changes to policy wording	Not significant	Yes	No update required
S16	Minor changes to policy wording	Not significant	Yes	No update required
S17	Minor changes to policy wording	Not significant	Yes	No update required
S18	Minor changes to policy wording	Not significant	Yes	No update required
S19	Minor changes to policy wording	Not significant	Yes	No update required
S20	Minor changes to policy wording	Not significant	Yes	No update required

S21	Minor changes to policy wording	Not significant	Yes	No update required
S22	Minor changes to policy wording	Not significant	Yes	No update required
S23	No changes to policy	n/a	n/a	No update required
S24	Minor changes to policy wording	Not significant	Yes	No update required
S25	Minor changes to policy wording	Not significant	Yes	No update required
S26	Minor changes to policy wording	Not significant	Yes	No update required
S27	Minor changes to policy wording	Not significant	Yes	No update required
S28	Minor changes to policy wording	Not significant	Yes	No update required
S29	Minor changes to policy wording	Not significant	Yes	No update required
S30	Minor changes to policy wording	Not significant	Yes	No update required
S31	Minor changes to policy wording	Not significant	Yes	No update required
S32	Minor changes to policy wording	Not significant	Yes	No update required
S33	Minor changes to policy wording	Not significant	Yes	No update required
S34	Delete site allocation	Not significant	Yes	No update required
S35	Minor changes to policy wording	Not significant	Yes	No update required
S36	Minor changes to policy wording	Not significant	Yes	No update required
S37	Minor changes to policy wording	Not significant	Yes	No update required
S38	Minor changes to policy wording	Not significant	Yes	No update required
S40	Minor changes to policy wording	Not significant	Yes	No update required
S41	Minor changes to policy wording	Not significant	Yes	No update required
S42	Minor changes to policy wording	Not significant	Yes	No update required
S43	No changes	n/a	n/a	No update required
S44	Changes to wording and reduction in site capacity	Not significant	Yes	No update required
S45	Minor changes to policy wording	Not significant	Yes	No update required
S46	Minor changes to policy wording	Not significant	Yes	No update required
S47	Delete site allocation	Not significant	Yes	No update required
S48	Delete site allocation	Not significant	Yes	No update required

S49	Delete site allocation	Not significant	Yes	No update required
S51	Minor changes to policy wording and reduction in site capacity	Not significant	Yes	No update required
S52	Minor changes to policy wording and reduction in site capacity	Not significant	Yes	No update required
S53	Delete site allocation	Not significant	Yes	No update required
S54	Minor changes to policy wording	Not significant	Yes	No update required
S55	Minor changes to policy wording	Not significant	Yes	No update required
S56	Minor changes to policy wording	Not significant	Yes	No update required
S57	Minor changes to policy wording	Not significant	Yes	No update required
S58	Delete site allocation	Not significant	Yes	No update required
S59	Minor changes to policy wording and reduction in site capacity	Not significant	Yes	No update required
S60	Minor changes to policy wording	Not significant	Yes	No update required
S61	Delete site allocation	Not significant	Yes	No update required
S62	No changes to policy	n/a	n/a	No update required

Table 2 summary of proposed changes to the site policies of the Local Plan

- 1.3.5 Seven housing site allocations are proposed for deletion, the impact of this is dealt with in relation to the overall strategy, discussed above and in further detail in Section 3. There is therefore no need to review the SA for these policies.
- 1.3.6 Three housing site allocations and one Gypsy and Traveller site are proposed with reduced capacities. These have been amended to reduce potential impacts of the proposals, the sites have been previously assessed in the SA, and there is therefore no need to re-assess them.
- 1.3.7 Other minor changes to policy wording have been made for clarity, consistency, effectiveness, and to ensure any impacts can be properly addressed. All of these sites and policies have been previously assessed and the changes are not significant, there is therefore no need to re-assess any of the site policies.

Topic Policies

1.3.8 Table 3 below sets out the proposed changes to the topic policies.

Issue/Policy	Summary of proposed change	Significance	Previously assessed	Conclusion
HOU1	No changes to policy wording	n/a	n/a	No update required
HOU2	Minor changes to policy wording	Not significant	Yes	No update required
HOU3a	Minor changes to policy wording and removal of some settlements from policy	Not significant	Yes	No update required
HOU5	Minor changes to policy wording and removal of some settlements from policy	Not significant	Yes	No update required
HOU6	Minor changes to policy wording	Not significant	Yes	No update required
HOU7	Minor changes to policy wording	Not significant	Yes	No update required
HOU8	Minor changes to policy wording	Not significant	Yes	No update required
HOU9	Minor changes to policy wording	Not significant	Yes	No update required
HOU10	Minor changes to policy wording	Not significant	Yes	No update required
HOU11	No changes to policy wording	n/a	n/a	No update required
HOU12	No changes to policy wording	n/a	n/a	No update required
HOU14	Minor changes to policy wording	Not significant	Yes	No update required
HOU15	Minor changes to policy wording	Not significant	Yes	No update required
HOU16	Minor changes to policy wording	Not significant	Yes	No update required
HOU17	Minor changes to policy wording	Not significant	Yes	No update required
HOU18	No changes to policy wording	Not significant	Yes	No update required
EMP1	Minor changes to policy wording	Not significant	Yes	No update required
EMP2	Minor changes to policy wording	Not significant	Yes	No update required
EMP3	No changes	n/a	n/a	No update required
EMP4	No changes to policy wording	n/a	n/a	No update required
EMP5	No changes to policy wording	n/a	n/a	No update required
EMP6	Re-drafting of policy	Not significant	Yes	No update required
EMP7	Re-drafting of policy	Not significant	Yes	No update required
EMP8	Re-drafting of policy	Not significant	Yes	No update required

EMP9	Minor changes to policy wording	Not significant	Yes	No update required
EMP10	Changes to policy title	Not significant	Yes	No update required
EMP11	No changes	n/a	Yes	No update required
TRA1	No changes to policy wording	n/a	n/a	No update required
TRA2	Minor changes to policy wording	Not significant	Yes	No update required
TRA3a	Minor changes to policy wording	Not significant	Yes	No update required
TRA3b	Minor changes to policy wording	Not significant	Yes	No update required
TRA4	Minor changes to policy wording	Not significant	Yes	No update required
TRA5	Minor changes to policy wording	Not significant	Yes	No update required
TRA6	Minor changes to policy wording	Not significant	Yes	No update required
TRA7	Minor changes to policy wording	Not significant	Yes	No update required
TRA8	No changes	n/a	n/a	No update required
TRA9	No changes to policy wording	n/a	n/a	No update required
ENV1	Minor changes to policy wording	Not significant	Yes	No update required
ENV2	Minor changes to policy wording	Not significant	Yes	No update required
ENV3a	Minor changes to policy wording	Not significant	Yes	No update required
ENV3b	Minor changes to policy wording	Not significant	Yes	No update required
ENV4	Minor changes to policy wording	Not significant	Yes	No update required
ENV5	Minor changes to policy wording	Not significant	Yes	No update required
ENV6	Minor changes to policy wording	Not significant	Yes	No update required
ENV7	No changes	n/a	n/a	No update required
ENV8	Minor changes to policy wording	Not significant	Yes	No update required
ENV9	Minor changes to policy wording	Not significant	Yes	No update required
ENV10	Minor changes to policy wording	Not significant	Yes	No update required
ENV11	No changes	n/a	n/a	No update required
ENV12	No changes to policy wording	n/a	n/a	No update required
ENV13	Minor changes to policy wording	Not significant	Yes	No update required
ENV14	Minor changes to policy wording	Not significant	Yes	No update required
ENV15	Minor changes to policy wording	Not significant	Yes	No update required

COM1	Minor changes to policy wording	Not significant	Yes	No update required
COM2	Minor changes to policy wording	Not significant	Yes	No update required
COM3	No changes to policy wording	n/a	n/a	No update required
COM4	No changes to policy wording	n/a	n/a	No update required
IMP1	Minor changes to policy wording	Not significant	Yes	No update required
IMP2	Minor changes to policy wording	Not significant	Yes	No update required
IMP3	Delete policy	n/a	n/a	No update required
IMP4	No changes	n/a	n/a	No update required

Table 3 summary of proposed changes to the topic policies of the Local Plan

1.3.9 Proposed changes to topic policies in the Plan involve changes to detailed policy wording in order to aid clarity, consistency and effectiveness. Some policies have been deleted and re-drafted, however their overall aim remains the same. All of the policies have been previously assessed and it is not considered that any of the changes are of the significance to warrant any re-assessment.

1.3.10 One policy is proposed to be deleted (IMP3). This change does not raise any significant issues requiring an SA.

1.4 Contents of this report

The remainder of this Addendum report is set out as follows –

- Section 2 – Scope and content
- Section 3 – Addendum to Section 3
- Section 4 – Addendum to Section 4
- Section 5 – Addendum to Section 5

2. SCOPE AND CONTENT

- 2.1 No changes are proposed to the Scoping, Framework or Objectives of the Sustainability Appraisal Environmental Report May 2016.
- 2.2 The scoring system is retained, and is repeated here for ease of reference.

Table 4 – Key to scoring used in 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	/
Uncertain	The effect of the policy is uncertain and subject to implementation	?

3. ADDENDUM TO SECTION 3 - APPRAISAL OF STRATEGIC DEVELOPMENT PROPOSALS AND REASONABLE ALTERNATIVES

3.0.1 This section updates Section 3 of the Sustainability Appraisal Report 2016 and Addendum July 2017, to explain how the reasonable alternatives have changed and why the preferred alternatives have been selected for the main modifications to the draft Local Plan 2030, for the following issues:

- The number of homes to be developed
- The strategic distribution of housing and employment at Ashford

3.1 The number of homes to be developed

3.1.1 The original assessment of alternatives set out in the 2016 SA report identified the following four reasonable alternatives for the number of homes to be developed:

Alternative 2.1 – Meeting Objectively Assessed Need: 13,799 dwellings (2011-30)

Alternative 2.2 – Meeting Objectively Assessed Need with some additional housing to help accommodate migration from London: 13,799 dwellings plus additional 55 dwellings per annum from 2017

Alternative 2.3 – Meeting Objectively Assessed Need with uplift to achieve planned job growth: 13,965 dwellings

Alternative 2.4 – Meeting the housing need of the Enhanced Performance/Productivity Employment Scenario: 15,900 dwellings (2011-2030)

3.1.2 These options were based upon the evidence of housing and employment needs set out in the SHMA 2015⁴ and SEOR 2012⁵.

3.1.3 The Addendum July 2017 considered a revised housing target of 16,120 dwellings (2011-30), which was based upon updated evidence from the SHMA Update 2017. That revised housing requirement closely matched the level of housing development already assessed under Alternative 2.4 in the SA and therefore no further appraisal was carried out at that stage.

⁴ Strategic Housing Market Assessment 2015

⁵ Strategic Employment Options Report 2012

3.1.4 The main modifications to the plan now propose a further increase in housing requirement, in order to address affordability issues in the Borough. This is proposed as 16,872 (2011-2030) or 888 pa, which is in the region of 1,000 homes higher than the highest option tested in the original SA assessment. This is potentially significant and therefore an additional alternative (2.5) has been assessed against the SA objectives.

Appraisal of Development Options against SA Objectives

3.1.5 Below is an update to Table 9 (pg32) of the SA Report 2016 with the addition of Alternative 2.5 which has been assessed against the SA objectives. The assessments of Alternatives 2.1, 2.2, 2.3 and 2.4 remain the same, and are included for reference only.

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	Alternative 2.5 Meeting demographic starting point plus a market signals uplift of 13%
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.	?	?	?	?	?

3.1.6 Alternative 2.5 is likely to have marginally stronger negative effects than the previously preferred alternative (2.4), as when considered in isolation, additional land would be required to meet the increased housing requirement. This stronger negative effect could not be shown in the Table due to the

original scoring system. Requirements for additional land for housing would be likely to have stronger negative effects upon a number of the SA objectives in relation to the environment.

- 3.1.7 Whilst the previous assessments demonstrated that all scenarios would have a significant positive impact upon ensuring the delivery of a mix of good quality, sustainably constructed homes to meet identified needs, the provision of the higher level of housing is likely to have a more significant positive impact upon this objective than the other alternatives.
- 3.1.8 However, as a result of other changes proposed to the Plan, in relation to the delivery of the shortfall and overall Plan buffer, it has not been necessary to identify any additional sites for housing, and it is proposed for seven sites to be deleted, and three to have reduced capacities. When considering this alternative taking into account the other changes made in the Plan, it would have no greater negative impact upon the SA objectives, and could be considered to have a lesser negative impact, with fewer housing sites being required.

3.2 The Strategic Distribution of Housing and Employment at Ashford

- 3.2.1 The original assessment of alternatives identified the following three reasonable alternatives for the strategic distribution of housing and employment at Ashford:

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 (north; south; north east and south east).

- 3.2.2 These alternatives were developed based upon the land that was identified as being available for development in the Strategic Housing and Employment Land Availability Assessment. In alternative 5.3, the North West sector was reduced to the north sector only to provide a distinctive alternative which can be tested without impact on the AONB.
- 3.3.3 The SA Addendum July 2017 provided an update to Alternative 5.3 in order to take into account additional sites that were proposed within the north-west sector of the edge of Ashford.
- 3.3.4 The preferred distribution of housing across the borough in the main modifications remains to focus a large majority of development within and on

the periphery of Ashford urban area, supported by a proportionate scale of growth in rural service centres and other smaller settlements.

- 3.3.5 The proposed changes in the Main Modifications remove three sites which were located in the north-west sector of the edge of Ashford. These sites are proposed to be deleted as they are no longer required in order to assist in delivering housing in the early part of the Plan period to address the shortfall of provision since 2011, and it is considered they have relatively poor access to services and facilities capable of meeting everyday needs. This form of strategy has already been assessed under the original Alternative 5.2 in the SA Report 2016, and therefore no further re-assessment is required.

4. ADDENDUM TO SECTION 4 - APPRAISAL OF SITES

4.1 Introduction

4.1.2 Section 4 of the original SA report and Addendums July 2017 and November 2017 set out Stage B of the Sustainability Appraisal process in relation to the development sites and their reasonable alternatives. It explains the process for site selection and individual site assessments explain the reasons why sites were originally proposed to be allocated or not.

4.1.3 No new or additional sites are required to be assessed as a result of the proposed modifications and the deletion of sites in themselves does not raise any issues of significance that would require re-assessment.

5 ADDENDUM TO SECTION 5 – APPRAISAL OF TOPIC POLICIES

5.1 Introduction

5.1.1 This section considers the sustainability against the Sustainability Objectives of the revised strategic policy SP2 (The Strategic Approach to Housing Delivery), which reflects the increased housing requirements as outlined in Section 3.

5.2 Update to SP2

5.2.1 The main modifications to the plan now propose a further increase in housing requirement, in order to address affordability issues in the Borough. This is proposed as 16,872 (2011-2030) or 888 pa. Other changes include the spreading of the shortfall across a seven year period, and the reduction in the overall plan housing requirement buffer. This has resulted in an overall decrease of housing provision at Ashford and the villages/rural areas to 10,141 and 1,412 respectively.

5.2.3 These changes are included in a revised strategic approach to housing delivery which is set out in an updated SP2 and reasoned justification paragraphs. The revised policy is assessed against the SA objectives as set out in the following table.

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 proposals are required 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 on 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 particularly 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 town 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, and 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 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.

Ashford Borough Council Sustainability Appraisal (SA/SEA) Environmental Report Addendum 2018 (Ashford Local Plan 2030)



Representation Form

Please return this form by 5pm on Friday 26th October 2018

Personal Details*

Name of individual:

Organisation (where relevant):

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.

* Ashford Borough Council (ABC) is the data controller for the personal information you provide in this form. ABC's Data Protection Officer can be contacted at FOI@ashford.gov.uk. Your information will be used to inform Local Plan consultations and processing is being conducted relying upon the public interest legal basis under the Town and Country Planning Act. Given the statutory status of the Local Plan, relevant regulations, and the public interest in making information on the Local Plan consultation available, it is appropriate for us to make a wide range of information and documents available on our website. Once the consultation period has closed, all representations will be available to view on the Council's consultation portal www.ashford.gov.uk/consult. Conversely, however, there is no wider duty or need to disclose information other than that which is statutory. Your telephone number and/or email address will not be published. Your information may be retained and used for further consultation and therefore records will be retained permanently. We will redact any comments or information that is derogatory or offensive in nature. For more information on your rights please see the council's privacy statement <https://www.ashford.gov.uk/>.